

**FEDERAL COMMUNICATIONS COMMISSION
445 TWELFTH STREET SW
WASHINGTON DC 20554**

**MEDIA BUREAU
AUDIO DIVISION
APPLICATION STATUS:** (202) 418-2730
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January 13, 2016

Saul Levine, President
Mount Wilson FM Broadcasters, Inc.
1500 Cotner Avenue
Los Angeles, CA 90025

Re: Mount Wilson FM Broadcasters, Inc. (MWFB)
KIDD(AM), Monterey, CA
Facility Identification Number: 7721
Special Temporary Authority (STA)
BESTA- 20151216AEC

Dear Mr. Levine:

This is in reference to the request filed on December 16, 2015. MWFB requests an extension of the STA granted on June 24, 2015, with temporary facilities using the existing KNRY(AM) tower after the previous licensee ceased operations on December 31, 2014, due to financial problems.¹ In support of the request, MWFB stated that it resumed operations via the last STA on October 23, 2015, and requests additional time to prepare and file the required FCC Form 301 application for a new permanent site facility.

Requests for extension of STA will be granted only where the licensee can show that one or more of the following criteria have been met:

- Restoration of licensed facilities is complete and testing is underway;
- Substantial progress has been made during the most recent STA period toward restoration of licensed operation; or
- No progress has been made during the most recent STA period for reasons clearly beyond the licensee's control, and the licensee has taken all possible steps to expeditiously resolve the problem.

We noted that the request mentioned that the former licensee permanently lost the licensed KIDD transmitter site, and therefore MWFB plans on filing a new FCC Form 301 application for construction permit at a new site location, since the KNRY(AM) site is not suitable for a permanent KIDD(AM) facility. As a result, MWFB must now file a one page letter in triplicate with the Secretary's office to the attention of supervisory engineer Son Nguyen within the next seven business

¹ KIDD(AM) is licensed for DA operation on 630 kHz with 1 kW day and night.

days to request that the outstanding construction permit (BP-20140506ABH) to construct new shorter towers at the licensed site be cancelled immediately, since that site is no longer available for use.

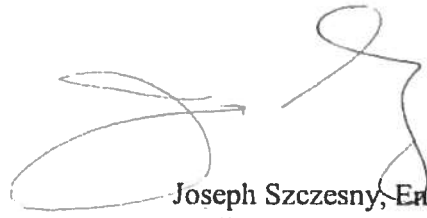
Accordingly, the request for extension of STA IS HEREBY GRANTED, and station KIDD(AM) may continue to operate with the following facilities:

Geographic coordinates	36° 36' 56" N, 121° 53' 53" W (NAD 1927)
Frequency	630 KHz
Hours of operation	Unlimited
Operating power	0.3 kW (day), 0.25 kW (night)
Antenna type	KNRY(AM) existing tower
ASRN	1010353
Antenna efficiency	276.2 mV/m

It will be necessary to further reduce power or cease operation if complaints of interference are received. KIDD(AM) must use whatever means are necessary to protect workers and the public from exposure to radio frequency radiation in excess of the Commission's exposure guidelines. See 47 CFR § 1.13 10. We anticipate that MWFB will file the required FCC Form 301 application before the expiration date shown below to show that substantial progress has been made.

This authority expires on **July 13, 2016**.

Sincerely,



Joseph Szczesny, Engineer
Audio Division
Media Bureau

cc: Melodie A. Virtue, Esq., GSB (via e-mail)

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0386 (July 2002)	FOR FCC USE ONLY
Extension of Existing Engineering STA Read Instructions/FAQ before filling out form		FOR COMMISSION USE ONLY FILE NO. - 20160705ABN

Section I - General Information

1.	Legal Name of the Applicant MOUNT WILSON FM BROADCASTERS, INC.	
	Mailing Address 1500 COTNER AVENUE	
	City LOS ANGELES	State or Country (if foreign address) CA
	Telephone Number (include area code) 3104785540	Zip Code 90025 -
	FCC Registration No 0001530187	Call Sign KIDD
	E-Mail Address (if available)	
2.	Contact Representative (if other than licensee/permittee) MELODIE A. VIRTUE, ESQ.	Firm or Company Name GARVEY SCHUBERT BARER
	Mailing Address 1000 POTOMAC STREET, N.W. SUITE 200	
	City WASHINGTON	State or Country (if foreign address) DC
	Telephone Number (include area code) 2029657880	ZIP Code 20007 - 3501
	E-Mail Address (if available) MVIRTUE@GSBLAW.COM	
3.	Purpose: <input type="radio"/> Engineering STA	
	<input checked="" type="radio"/> Extension of Existing Engineering STA File Number: BSTA - 20150608AAL	
	<input type="radio"/> Legal STA	
	<input type="radio"/> Extension of Existing Legal STA	
4.	Service: AM	
5.	Community of License: City: MONTEREY State: CA	
6.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial Educational Licensee/Permittee <input type="radio"/> Other <input checked="" type="radio"/> N/A (Fee Required)	
7.	Environmental Protection Act. The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an Exhibit is required. By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 33]
8.	Please explain in detail the "extraordinary circumstances" which warrant temporary operations at variance from the Commission's Rules. In addition, please specify 1)the specific rules and/or	[Exhibit 34]

<p>policies from which the applicant seeks temporary relief; 2) how the public interest will be furthered by grant; and 3) the expected duration of the STA and the licensee's plan for restoration of licensed operation. If requesting variance with other than authorized technical facilities, please specify the exact facilities sought.</p>	
<p>9. Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>

I hereby certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

<p>Typed or Printed Name of Person Signing SAUL LEVINE</p>	<p>Typed or Printed Title of Person Signing PRESIDENT</p>
<p>Signature</p>	<p>Date (mm/dd/yyyy) 7/5/2016</p>

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 33

Description: ENVIRONMENTAL

PLEASE SEE ENGINEERING STATEMENT IN EXHIBIT 16 IN BSTA - 20150608AAL.

Attachment 33

Exhibit 34

Description: REASON FOR STA EXTENSION

KIDD WAS MOST RECENTLY GRANTED AN EXTENSION OF ITS STA IN BESTA-20151216AEC, GRANTED 1/13/2016 (THE UNDERLYING ENGINEERING STATEMENT IS ATTACHED FROM THE INITIAL STA REQUEST). THE STATION'S TEMPORARY SITE IS CO-LOCATED WITH CO-OWNED KNRY ALONG THE CALIFORNIA COAST LINE. BECAUSE OF UNUSUALLY HIGH SURF, THAT SITE WILL NOT BE SUITABLE TO USE AS A PERMANENT SITE FOR KIDD.

NUMEROUS STEPS HAVE BEEN TAKEN TO BRING KIDD BACK TO FULL POWER AND ELIMINATE THE NEED FOR THE PRESENT STA OPERATION. BECAUSE KIDD IS ASSIGNED TO 630 KILOCYCLES THE SOLUTION IS MORE DIFFICULT BECAUSE OF THE NEED FOR HIGH TOWERS. A QUARTER WAVE TOWER AT 630 IS OVER 400 FEET HIGH. THIS INVOLVES A POTENTIAL NEED FOR CRITICAL APPROVAL FROM THE FAA AND THE CALIFORNIA COASTAL COMMISSION. KIDD IS PURSUING MULTIPLE EFFORTS TO FIND A SUITABLE SITE.

KIDD NOW HAS A CONSTRUCTION PERMIT TO RESTORE THE TOWERS THAT WERE DISMANTLED DUE TO RUSTING AND TOWER DETERIORATION OVER A 50 YEAR PERIOD. KIDD HAD BEEN OPERATING FROM AN AREA DESIGNATED AS A PUBLIC PARK IN THE CITY OF MARINA. BASED ON INFORMATION CONVEYED TO THE LICENSEE, THE PARK AREA ON WHICH THE TOWERS HAVE BEEN SITUATED WAS PREVIOUSLY OWNED BY A PRIOR KIDD LICENSEE. THE PARK AREA WAS DONATED TO THE CITY OF MARINA WITH THE PROVISION THAT KIDD WAS GRANTED PERPETUAL EASEMENTS TO OPERATE KIDD AND MAINTAIN TOWERS ON PARK PREMISES. AS OF THIS TIME THE CITY OF MARINA WILL NOT ALLOW KIDD TO BEGIN CONSTRUCTION OF THE FACILITIES AUTHORIZED BY THE FCC. KIDD HAS COMMUNICATED ITS BELIEF THAT UNDER THE EASEMENT GRANT, KIDD SHOULD BE ALLOWED TO PROCEED WITH CONSTRUCTION.

IT IS BELIEVED THE FAA SHOULD BE SATISFIED WITH THE PRESENT CP AUTHORIZATION SINCE IT PROVIDES FOR REDUCED TOWER HEIGHT. THE CALIFORNIA COASTAL COMMISSION SHOULD NOT DENY KIDD THE RIGHT TO MERELY REPLACE EXISTING TOWERS. IT IS LICENSEE'S BELIEF BASED ON THE FOREGOING THAT THE CITY IS TAKING ADVANTAGE OF THE NEED FOR KIDD TO REPLACE ITS TOWERS, AND IS KEEPING THE DONATED LAND WITHOUT PERFORMING THE OBLIGATION

TO ALLOW KIDD TO OPERATE FROM THE DONATED PROPERTY.

BECAUSE OF THE ISSUES WITH THE CITY OF MARINA, THE LICENSEE HAS BEEN SEEKING ALTERNATIVE SITES THAT APPEAR PROMISING. KIDD'S CONSULTING ENGINEER HAS BEEN RETAINED TO CONDUCT STUDIES OF VARIOUS OTHER POTENTIAL SITES.

CONTACT HAS BEEN MADE WITH MR. BUSTOS, HEAD OF BUSTOS MEDIA, WHO OPERATES A TOWER SITE FOR KZSJ. MR. BUSTOS WAS RECEPTIVE TO THE POSSIBILITY. THE LICENSEE'S ENGINEER HAS BEEN MAKING STUDIES OF THE USE OF THIS SITE.

ANOTHER POTENTIAL SITE IS BEING EXPLORED. NEGOTIATIONS HAVE BEEN CONDUCTED WITH THE OWNER OF KKHC, GONZALES, TO DIPLEX KIDD AT ITS SITE. THE LICENSEE'S ENGINEER IS CONDUCTING A STUDY OF THIS POSSIBILITY. FURTHER STUDY IS REQUIRED TO DETERMINE THE FEASIBILITY OF THIS SITE.

KIDD EXPLORED WITH EDUCATIONAL MEDIA FOUNDATION THE POSSIBILITY OF DIPLEXING ON A TOWER IT OWNS. KIDD'S ENGINEER CONDUCTED A STUDY AND DETERMINED IT IS NOT FEASIBLE TO OPERATE FROM THAT SITE.

KIDD IS CONFIDENT THAT IT CAN RESOLVE THE ISSUES WITH ADDITIONAL TIME. THE LICENSEE NEEDS MORE TIME TO DETERMINE WHERE IT CAN PERMANENTLY LOCATE KIDD. IT HAS BEEN WORKING WITH ITS CONSULTING ENGINEER TO DETERMINE THE BEST SOLUTION, AND KIDD MAY STILL BE ABLE TO CONVINCE THE CITY OF MARINA TO ALLOW IT TO REBUILD AT THE SITE FOR WHICH IT HAS A CONSTRUCTION PERMIT.

THE LICENSEE RESPECTFULLY REQUESTS ADDITIONAL TIME TO CONTINUE OPERATING PURSUANT TO THE STA UNTIL IT CAN MOVE TO A PERMANENT SITE. THE PUBLIC INTEREST WOULD BE SERVED BY ALLOWING KIDD TO REMAIN ON THE AIR DURING THE INTERIM SO THAT THE LISTENING PUBLIC WILL NOT BE DEPRIVED OF ITS SERVICE.

Attachment 34

Description
PURPOSE FOR STA, TECHNICAL DESCRIPTION & ENVIRONMENTAL

ENGINEERING STATEMENT
PREPARED IN SUPPORT OF
REQUEST FOR SPECIAL TEMPORARY AUTHORITY
KIDD 630 kHz 0.25/0.3 kW ND-U MONTEREY, CALIFORNIA

JUNE 2015

The following engineering statement has been prepared on behalf of Mount Wilson FM Broadcasters, Inc. ("Mt. Wilson") licensee of standard broadcast station KNRV, Monterey, California and proposed assignee of standard broadcast station KIDD, facility ID 7721, also Monterey, California. In BLSTA-20150130ADS it is stated that KIDD ceased operation on December 31, 2014 and requests STA to allow the station to remain silent. The purpose of this STA request is to seek authority to return KIDD to the air by diplexing on the tower of KNRV, facility ID, 35276. The KNRV tower was recently refurbished and licensed under BML-20130605ACL.

Mt. Wilson has worked with Phasetek Corporation to develop a duplex system which is custom designed for KIDD operation on the existing KNRV non-directional tower, FCC Registration number 1010353. The KNRV site is located 12.15 kilometers southwest of the licensed KIDD site which places the STA facility both within the community of license and directly in the major lobes of the KIDD daytime and nighttime directional antenna patterns.

An STA for use of the KNRV site is herein requested based on the following parameters:

Frequency (kHz):	630
North Latitude:	36° 36' 56"
West Longitude: (NAD 27)	121° 53' 53"
Tower Registration Number:	1010353

Power Day: 0.30 kW
Night: 0.25 kW

Radiator Height: 61 meter vertical self-supporting tower, 46.1 electrical degrees in height. The tower sits adjacent to the ocean and the salt water ground system is treated as having full radiation efficiency. Radio efficiency was determined using the FCC Pop-Up tool Figure 8

Theoretical efficiency: 276.2 mV/m @ 1 km for 1 kW

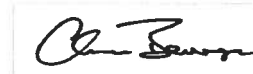
It is noted that the proposed STA tower and site, although existing, are not suitable for KIDD licensed operation as the Omni antenna configuration is unable to comply with minimum antenna radiation efficiency standards.

Figure 1 depicts the proposed STA 0.5 mV/m along with the licensed KIDD 0.5 mV/m contours. The proposed STA 0.5 mV/m contour lies within the licensed 0.5 mV/m contour.

Figure 2 depicts the day allocation to nearby stations for both the KIDD licensed and proposed STA operations. The proposed STA facility creates no new overlap to co-ch station KPLY, Reno, Nevada and significantly reduces caused overlap to first adjacent channel station KIGS Hanford, California.

The KNRY tower base is fenced to prevent unauthorized access by the public. KIDD will reduce power or cease operation as required to meet FCC OET-65 Guidelines for worker exposure. Spurious and harmonic emission measurements to insure compliance with applicable FCC rules will be completed prior to regular program operation.

The foregoing was prepared on behalf of Mount Wilson FM Broadcasters, Inc. by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.



BY: _____

Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey
June 5, 2015

FCC MB - CDBS Electronic Filing
Application Reference Number: 20160705ABN
Successfully filed at Jul 5 2016 12:07PM

A Fee Payment is Required for this application. The Total Fee is \$190.

You can use the FCC's Electronic Form 159 System to pay electronically and/or to print out an appropriate Form 159. Press the button below now or return to this screen later by pressing the "Pay Fee" button on the CDBS Main Menu/ Informal Menu. See the [CDBS User's Guide](#) for more information about fee payment.

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Payment must be received by US Bank within 14 (calendar) days of the date that the application is officially received by the Media Bureau's electronic filing system (indicated by the reference number above). This deadline applies to any payment submission method (electronic or via a paper check). If payment is not received in time, the filed application will be considered to be **not paid** and will therefore not be processed by the MB.