



October 4, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Digital Radio Request
445 Twelfth Street, S.W.
Room 2-B450
Washington, D.C. 20554

Re: KGON (FM) – Portland, OR
Facility ID #2432 - CH222C (92.3 MHz)
Request for Special Temporary Authority (STA) to Implement HD Radio Transmissions

Dear Ms. Dortch:

Entercom Portland License, LLC hereby requests Special Temporary Authority (STA) to operate KGON with its co-located, licensed auxiliary antenna transmission system as an emitter to commence digital broadcasting using iBiquity Digital Corporation's HD Radio™ technology. Due to the urgent nature of bringing digital FM radio transmissions to the general population, Entercom Portland License, LLC respectfully, requests accelerated processing of the instant STA request. Both the KGON main and co-located auxiliary antenna systems are non-directional.

The licensed main analog facility of KGON (FCC File No. BLH19900820KF) uses an omni-directional Jampro spiral antenna system with an analog effective radiated power (ERP) of 100,000 watts at a center of radiation of 386 meters height above average terrain (HAAT). This antenna center of radiation is mounted at 170 meters above ground level (AGL). The transmitter output power (TPO) and ERP of the main KGON analog system will remain unchanged.

The co-located licensed analog auxiliary antenna (FCC File no. BLH-19920904KA) uses an omni-directional ERI model SHP-4AC, 0.5 lambda spaced 4 element antenna system with an analog ERP of 42,000 watts at a center of radiation of 312 meters HAAT (~81% of the main antenna HAAT). The licensed auxiliary antenna center of radiation is mounted at 96 meters AGL. The licensed auxiliary antenna is installed on the same tower as the licensed main antenna. With this antenna configuration, the digital TPO will be 875 watts,

and the HD Radio ERP will be 1,000 watts.

At no time will the resulting 60dBu F(50,50) signal contour(s) exceed the licensed auxiliary facility 60dBu F(50,50) signal contour. Attached as Exhibit 1 is a coverage map depicting the standard prediction method 60dBu F(50,50) signal contour of the licensed and proposed use of the auxiliary antenna configurations, demonstrating no extension of the licensed auxiliary coverage contour. For the sake of convenience, attached is a copy of the pertinent KGON auxiliary antenna instrument of authorization.

The spectrum of the radiated hybrid IBOC signal as proposed herein is within the emissions mask that is specified in Section 73.317 for analog FM transmissions. Compliance with the mask will be by inspection of separate spectrum analyzer measurements for the proposed separate antenna configuration. Such measurements are not prescribed in the FM rules, however spectrum analyzer measurement techniques for AM stations are presented in paragraph 73.44(a) of the rules. These procedures may be adapted to show compliance with the FM mask. The power of the digital transmitter will be reduced, if necessary to comply with the Commission's emissions rules.

I have examined the Commission's environmental requirements in 47 §CFR 1.1307. Based upon my computation using the FCC FM Model, Version 2.10 Beta, power density computer program, I have determined that the proposed antenna configuration does not have a significant environmental impact as defined by Section 1.1307, which includes consideration of the exposure of workers or the general public to levels of radio frequency radiation exceeding identified guidelines issued by the American National Standards Institute (ANSI/IEEE C95.1-1992, "Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3kHz to 300GHz"). Access to the site is restricted and there is no general public exposure above the FCC RF radiation limit. The tower base area is adequately fenced and securely gated with appropriate warning signs posted. With respect to "on tower" or other exposure to workers at the site, appropriate power reduction or cessation of analog and digital transmitter operations will be undertaken by the licensee and other site tenants.

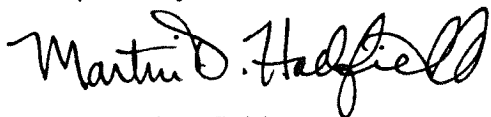
Entercom Portland License, LLC hereby agrees to comply with all relevant FCC requirements for experimental broadcast stations. In the event of interference, questions should be directed to Entercom Portland License, LLC's local technical representative: Gary Hilliard (503) 535-0468.

A 180-day STA is requested; once the tests are completed, if successful, Entercom Portland License, LLC will request permission for continued operation of the transmission system.

This report and attached exhibit were prepared by me or under my direct supervision. All information is true and correct to the best of my knowledge. My experience is a matter of record with the Commission.

Pursuant to Section 1.1104 of the FCC's Rules, a fee of \$145.00 will be filed, as required, with FCC Form 159 through the appropriate federal lock box in Pittsburgh, PA. Any questions concerning this application should be directed to the undersigned.

Respectfully submitted,

A handwritten signature in black ink that reads "Martin D. Hadfield". The signature is written in a cursive style with a large, stylized initial "M".

Martin D. Hadfield
Vice President-Engineering
Entercom Portland License, LLC
October 4, 2004

attachment

cc: Charles N. Miller - via fax (202) 418-1410
Brian Madden, Esq.
Entercom Portland License, LLC (Local File)

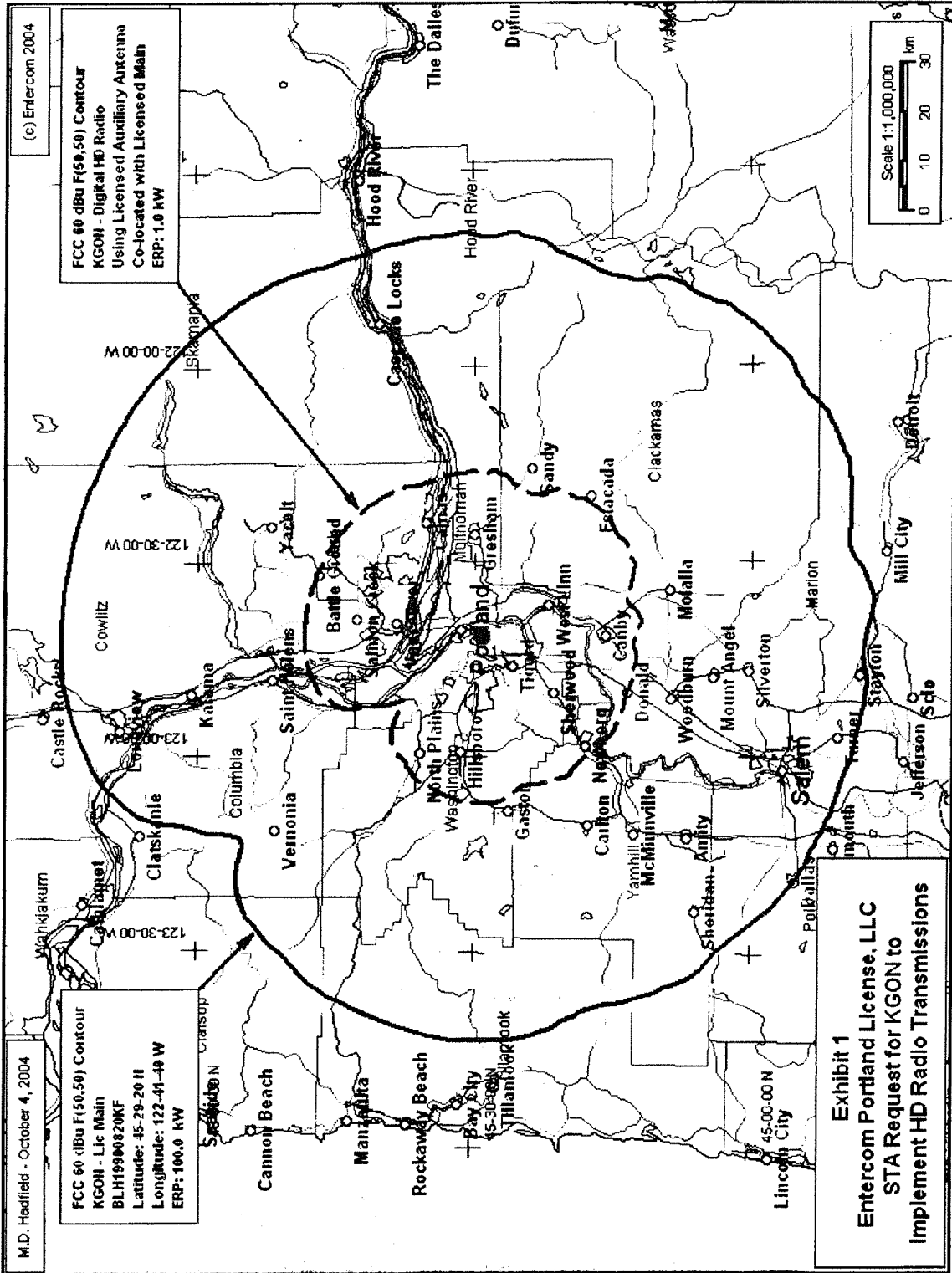


Exhibit 1
Entercom Portland License, LLC
STA Request for KGOH to
Implement HD Radio Transmissions