

March 22, 2022

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

Via Email – audiofilings@fcc.gov

Attention: Media Bureau, Audio Division

Re: WPTF(AM), Raleigh, N.C. (Fac. ID No. 21630)
First State Communications; FRN 0001940048
Request for Special Temporary Authority

Dear Ms. Dortch:

This firm is counsel to First State Communications (“Licensee”) (FRN 0001940048), licensee of AM Station WPTF(AM), Raleigh, N.C. (Fac. ID No. 21630) (the “Station”).

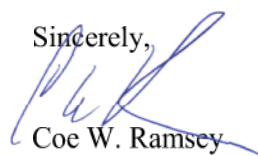
The Station is currently operating non-directionally from its daytime tower during nighttime hours with a reduced power of 10 kilowatts pursuant to special temporary authority in CDBS File No. BSTA-20211006AAF. Such operation is necessary in connection with the relocation of commonly-owned station WKIX(AM), Raleigh, N.C., to the Station’s #2 north tower in accordance with CDBS File No. BP-20200304AAC. The Station’s special temporary authority expires on April 13, 2022.

The filtering and matching networks for WKIX(AM) have been installed and adjusted, and the Licensee is in the process of restoring the Station’s nighttime directional antenna pattern. As explained in the enclosed Engineering Statement, the Licensee hereby respectfully requests that the Commission grant special temporary authority for the Station to (a) continue operating non-directionally from its daytime tower during nighttime hours with a reduced power of 10 kilowatts or with nighttime directional parameters at variance (to allow testing of the antenna), and (b) permit nighttime directional operation following the restoration of the Station’s nighttime directional antenna pattern using method of moment modeling and internal array parameters with the new computer derived parameters pending preparation, filing, and processing of an FCC Form 302 application notifying the return to direct measurement of power. Grant of such special temporary authority would serve the public interest by allowing the Station to remain on the air.

Enclosed herewith is an Anti-Drug Abuse Act Certification as executed by the Licensee.

If any questions should arise during the course of your consideration of this matter, it is respectfully requested that you communicate with this office.

Sincerely,



Coe W. Ramsey

Enclosures – Anti-Drug Abuse Act Certification; Engineering Statement

Anti-Drug Abuse Act Certification

Answer YES if all parties to the application are in compliance with Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, the federal law which provides federal and state court judges the discretion to deny federal benefits to individuals convicted of offenses consisting of the distribution of controlled substances. For a definition of "party" for these purposes, see 47 C.F.R. Section 1.2002(b). See also Amendment of Part 1 of the Commission's Rules to Implement Section 5301 of the Anti-Drug Abuse Act of 1988, 6 FCC Rcd 7551, 57 Fed. Reg. 00186 (1991).

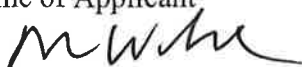
☒ YES ☐ NO

By checking yes, the applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a party for these purposes, see 47 C.F.R. Section 1.2002(b).

I certify that the statements made in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

First State Communications

Name of Applicant



/ 3/21/2022

Signature and Date

Donald W. Curtis

Printed Name of Person Signing

President

Title

WPTF Request for Special Temporary Authority

Call Sign of Station and

Type of Request (Special Temporary Authority, etc.)



**ENGINEERING STATEMENT OF JAMES D. SADLER
IN SUPPORT OF A REQUEST FOR
SPECIAL TEMPORARY AUTHORITY
STATION WPTF – RALIEGH, NORTH CAROLINA
680 kHz – 50 kW-D, 50 kW-N, U, DA-N
Facility ID: 21630**

Licensee: First State Communications, Inc.

I am a Technical Consultant, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

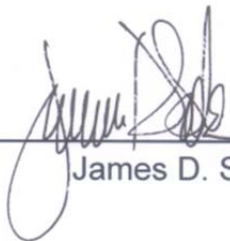
This office has been authorized by First State Communications, Inc. ("FSC"), licensee of AM Broadcast Station WPTF, Raleigh, North Carolina, to prepare this engineering statement in support of a request for Special Temporary Authority (STA). Station WPTF is licensed for operation on 680 kilohertz with power of 50 kilowatts during daytime and nighttime hours employing a directional antenna pattern during nighttime hours (DA-N). FSC has a STA to operate non-directionally from the daytime tower during nighttime hours with a reduced power of 10 kilowatts to facilitate implementation of the co-location of AM Station WKIX. Station WKIX was authorized to co-locate and diplex at the WPTF transmitter site in its outstanding construction permit, FCC File No. BP-20200304AAC. The WPTF STA has expiration date of April 13, 2022.

The WKIX filtering and matching networks have been installed and adjusted. FSC is in the process of restoring the WPTF nighttime directional antenna pattern and verifying the array using method of moment modeling and internal array parameters. STA is requested to continue to operate as required at reduced power during daytime hours, non-directionally during

nighttime hours at a power level no greater than 10 kilowatts or with nighttime directional parameters at variance. Following the restoration of the nighttime directional pattern using method of moment modeling and internal array parameters, it is requested that the STA allow for the continued operation of the WPTF nighttime directional operation with the new computer derived parameters during the preparation and Commission processing of the Application for Direct Measurement of Power.

This engineering statement was prepared by the undersigned and the information contained herein is believed to be true and correct.

DATED: March 18, 2022



James D. Sadler