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May 27, 2022

Marlene H. Dortch, Secretary Federal Communications Commission Washington, DC 20554 Via email to <u>audiofilings@FCC.gov</u>

Dear Ms. Dortch:

On behalf of our client KASA Radio Hogar, licensee of AM radio station KASA, Phoenix, Arizona (FCC facility ID 33451), I am writing to request a further extension of the special temporary authority granted in BSTA-20190904AAA for this station to operate with parameters at variance from licensed values pending relocation of the station's permanent transmitting facilities.

The background with respect to the station's situation is set forth in a request filed October 28, 2021 (File No. BESTA-20211028AAK), which is incorporated herein by this reference. (In essence, KAA has been operating with a temporary antenna at reduced power from a corner of the property on Baseline Road in Phoenix adjacent to where its multi-tower directional antenna array had been located for many years.)

Since the date of the prior STA request, the licensee has finalized plans to relocate KASA's licensed facilities to the transmitter and antenna site occupied by AM station KOY, Phoenix.

In order to complete the application for a permit for the construction of KASA's new transmitting facilities there, KASA has been advised to undertake a series of field strength measurements of the field strength of the KOY signal in the direction of the Tucson station that KASA is obligated to protect. (It is believed that the soil conductivity over that path is much lower now than predicted by FCC Map M-3, at least in part due to the greatly increased levels of urbanization in the subject area over the last 60 years.)

Toward that end, KASA's consulting engineer (Charles A. Hecht) has developed specifications for the subject measurements. Unfortunately, the field engineer who was undertake the field strength measurements has been delayed by illness in completing this work. The good news is that he has recovered his health, and is scheduled to be in Phoenix within the next week to proceed with that task. It is expected that receipt of the

measurement data will allow the application for the construction permit to be completed soon thereafter. While the delay has been frustrating, use of measurement data should allow the new KASA facility to broadcast with substantially greater power than would be possible if the application had to be based on M-3 soil conductivity values that are now outdated.

If you have any questions, please call me at the above number, or communicate through email to wood@legalcompass.com.

Yours truly,

Berry D. Wood

Counsel for KASA Radio Hogar