



Federal Communications Commission  
Washington, D.C. 20554

June 1, 2022

AKAL Media KKDZ, Inc.  
15 Grady Way  
Suite 504  
Renton, WA 98057

Re: AKAL Media KKDZ, Inc.  
KKDZ(AM), Seattle, WA  
Fac. ID No.: 12112  
Special Temporary Authority

Dear Applicant:

This is in reference to the request filed February 17, 2022 on behalf of AKAL Media KKDZ, Inc. ("AKAL") and granted on April 26, 2022. The STA grant is being reissued to specify operation on tower #4 of the array rather than tower #2. No other changes are proposed and both towers are the same height.

AKAL requests special temporary authority ("STA") to operate station KKDZ(AM) from an alternate site location for which it has obtained a construction permit (BP-20210315AAH).<sup>1</sup> The permit authorizes operation on 1250 kHz with a full-time power of 5 kilowatts, using a directional antenna from local sunset to local midnight on a shared time basis with KWSU(AM). The construction permit also authorizes a change of community of license from Seattle to Kent, Washington.

In support of the request, AKAL states that the station lost use of the site used for the directional operation and is currently operating under STA from the non-directional daytime transmitter site. AKAL states that construction has progressed to the point where it wishes to transfer operation to the construction permit site. Thus, AKAL respectfully requests STA to operate KKDZ(AM) from the construction permit site at a power not to exceed 5 kilowatts daytime and 1.25 kilowatts nighttime, using the non-directional daytime antenna specified in BP-20210315AAH.

STA requests which involve a change in transmitter site must include four critical elements: (1) Loss of the licensed site must be beyond the licensee's control; (2) STA facilities must continue to provide service to the licensed community; (3) STA facilities must maintain, as closely as

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<sup>1</sup> KKDZ(AM) is licensed for operation on 1250 kHz with a daytime and nighttime power of 5 kilowatts, employing a directional antenna pattern during nighttime hours (DAN-U). The station is also authorized by construction permit (BP-20210315AAH) to operate on 1250 kHz from a different location with a daytime and nighttime power of 5 kilowatts, employing a directional antenna pattern during nighttime hours (DAN-U).

practicable, the licensed service area<sup>2</sup> without extending it; (4) STA facilities cannot involve the construction of towers intended for permanent use by the station requesting the STA.

Accordingly, the request for STA is GRANTED, **however the daytime non-directional power must not exceed 2.5 kilowatts**. Station KKDZ(AM) may operate with the following facilities:

Geographic coordinates	47° 17' 59" N, 122° 11' 14" W (NAD 1927)
Frequency	1250 KHz
Hours of operation	Daytime and Nighttime
Operating power	2.5 kilowatts (Daytime), 1.25 kilowatts (Nighttime)
Antenna type	Existing tower
ASRN	1037826
Antenna electrical height	86.9°
Antenna Efficiency	303.33 mV/m/kW at 1 km

It will be necessary to further reduce power or cease operation if complaints of interference are received. KKDZ(AM) must notify the Commission when licensed operation is restored. KKDZ(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 § 1.1310.

This authority expires on **October 23, 2022**.

**STA Advisory:** Section 309(f) of the Communications Act of 1934, as amended, authorizes the Commission to grant STA in cases of "extraordinary circumstances requiring temporary authorizations in the public interest and when delay in the institution of the temporary operations would seriously prejudice the public interest." However, Section 309(f) is not a means by which a licensee/permittee may circumvent established processing procedures which require the filing of an application, nor is it a means by which a broadcaster may enhance his facility or make operation more convenient for the broadcaster. Stations operating with less than licensed facilities under temporary authorities can be viewed as receiving the benefit of a larger protection area than that in which they are currently providing service.

Accordingly, Special Temporary Authorities by nature are to be temporary and are not intended for extended use. Licensees of stations operating under temporary authorities are reminded that timely restoration of permanent facilities is the responsibility of the licensee and should be undertaken expeditiously. Any request for extension of special temporary authorities carries an increased burden with each subsequent request.

Therefore, 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:

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<sup>2</sup> For AM - 0.5 mV/m contour; for FM - 1.0 mV/m contour.

- 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.

Sincerely,

A handwritten signature in black ink that reads "Jerome J. Manarchuck". The signature is written in a cursive style with a large, stylized initial "J" and a long, sweeping tail.

Jerome J. Manarchuck  
Audio Division  
Media Bureau

cc: Thomas S. Gorton, P.E. (via email only)