

June 27, 2022

**VIA E-MAIL (audiofilings@fcc.gov)**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE Washington, DC 20554

ATTN: Media Bureau, Audio Division

Re: Good Karma Broadcasting LLC Request for Engineering  
STA KSPN(AM), Facility ID No. 33255, Los Angeles, CA

Dear Ms. Dortch:

Pursuant to section 73.1635 of the rules of the Federal Communications Commission,<sup>1</sup> Good Karma Broadcasting LLC, licensee of Station KSPN(AM), Facility ID No. 33255, Los Angeles, CA, by its attorneys, hereby submits this request for engineering Special Temporary Authority to permit operations as described in the attached Engineering Statement.

Attached hereto is the requisite Anti-Drug Abuse Act Certification. Should you have any questions regarding this request, please contact the undersigned.

Respectfully submitted,

/s/ Nancy A. Ory

Nancy A. Ory

*Counsel to Good Karma Broadcasting LLC*

Attachments

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<sup>1</sup> 47 C.F.R. § 73.1635



**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).

\_\_\_\_\_X\_\_\_\_\_ 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.

Good Karma Broadcasting, LLC  
Name of Applicant

Craig Karmazin  
Signature and Date

Craig Karmazin  
Printed Name of Person Signing

Managing Member  
Title

KSPN(AM), Facility ID No. 33255, Los Angeles, CA – Engineering STA  
Call Sign of Station and Type of Request (Special Temporary Authority, etc.)



**ENGINEERING STATEMENT OF CARL T. JONES, JR., P.E.  
IN SUPPORT OF A  
REQUEST FOR SPECIAL TEMPORARY AUTHORITY  
KSPN(AM) – LOS ANGELES, CALIFORNIA  
710 kHz – 34.0 kW DAY, 2.5 kW NIGHT, DA-2, U  
FACILITY ID: 33255**

**LICENSEE: GOOD KARMA BROADCASTING, L.L.C.**

I am a Consulting Engineer and president 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. I am a Registered Professional Engineer in the Commonwealth of Virginia, Registration No. 013391.

This office has been authorized by Good Karma Broadcasting, L.L.C. (“Good Karma”), the licensee of AM Station KSPN, Los Angeles, California, to prepare this engineering statement in support of a Request for Special Temporary Authority (“STA”). Good Karma has been granted a construction permit to relocate the KSPN transmission facilities to the KRDC transmitter site and diplex onto the existing KRDC towers.<sup>1</sup> The Construction Permit authorizes operation on 710 kilohertz with a daytime power of 34 kilowatts and a nighttime power of 2.5 kilowatts using different directional patterns for daytime and nighttime operation (DA-2).

Good Karma intends to verify the KSPN directional patterns authorized in the Construction Permit pursuant to the Method of Moments proofing procedures described in 47 CFR 73.151(c). After completion of all necessary impedance measurements, sample system verification measurements and moment method modeling, it is planned

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<sup>1</sup> FCC Construction Permit BP-20200914AAV granted January 5, 2021.

to adjust the KSPN daytime and nighttime directional antenna systems for the modeled operating parameters. STA is requested to operate KSPN: 1) non-directionally as necessary, at a power no greater than 25% of the authorized power, to facilitate implementation and adjustment of the Construction Permit facilities and to protect workers during equipment installation and adjustment; and 2) directionally during daytime and nighttime hours with the new moment method model derived operating parameters at the power levels authorized in the Construction Permit until such time as the FCC issues program test authority or issues a new license.

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

DATED: May 26, 2022

