



Federal Communications Commission
Washington, D.C. 20554

July 18, 2022

Good Karma Broadcasting, LLC
275 West Wisconsin Avenue
Milwaukee, WI 53203

Re: Good Karma Broadcasting, LLC
KSPN(AM), Los Angeles, CA
Fac. ID No.: 33255
Special Temporary Authority

Dear Applicant

This is in reference to the request filed June 27, 2022, on behalf of Good Karma Broadcasting, LLC ("GKB"). GKB requests special temporary authority ("STA") to operate station KSPN(AM) from its authorized construction permit site with temporary non-directional facilities. In addition, GKB intends to verify the KSPN(AM) directional patterns authorized in its construction permit pursuant to the Method of Moments proofing procedures. Therefore, the station is also requesting the option to operate with parameters at variance as well.

Specifically, KSPN(AM) is requesting non-directional operation during daytime and nighttime hours from its authorized construction permit site at a power not to exceed 25% of the authorized power. Non-directional operation is necessary to facilitate implementation and adjustment of the construction permit facilities and to protect workers during equipment installation and adjustment. Additionally, the station is also requesting operation during daytime and nighttime hours with the new moment method model derived operating parameters at the power levels authorized in the construction permit.

Accordingly, the request for STA IS HEREBY GRANTED. Station KSPN(AM) may operate non-directionally during daytime and nighttime hours from one of the elements in the KRDC(AM) array with a daytime power not to exceed 8.5 kilowatts and a nighttime power not to exceed 0.625 kilowatt. In addition, the station may operate directionally with the new moment method derived operating parameters at the power levels authorized in the construction permit.

Simultaneous operation of stations KSPN(AM) and KRDC(AM) from the KRDC(AM) site shall not commence until sufficient diplexing equipment has been installed and properly adjusted to reduce all spurious emissions below the levels specified in 47 CFR Section 73.44(b). Within 10 days after commencement of such operation, GKB must submit the results of measurements which demonstrate compliance with the above condition. In addition, a copy of a firm agreement of the three stations fixing the responsibility of each with regard to the installation and maintenance of such equipment shall be submitted with the results of the measurements. GKB shall also be responsible for handling all reasonable complaints of blanketing interference within the 1 V/m contour as required by Section 73.88 of the Commission's rules.

It will be necessary to further reduce or cease operation if complaints of interference are received. KSPN(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 **January 14, 2023**.

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:

- 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,



Jerome J. Manarchuck
Audio Division
Media Bureau

cc: Nancy A. Ory, Esq. (via email only)