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May 23, 2023

VIA e-mail: audiofilings@fcc.gov

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

Re: Salem Communications Holding Corporation

WORL(AM), Orlando, FL (Facility ID 48731)

Request for Extension of Special Temporary Authority ("STA")

Dear Ms. Dortch:

On behalf of Salem Communications Holding Corporation ("SCHC"), licensee of WORL(AM), Orlando, FL, facility ID 48731, this is to request a further extension of the special temporary authority, BSTA-20100622AEQ, granted on July 28, 2010, to operate with an increased nighttime power of 10 kW to overcome interference from co-channel station CMBD, La Habana, Cuba. See attached Engineering Statement for additional information.

The licensee has authorized undersigned counsel to certify on its behalf that the licensee is not subject to denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

If you have any questions regarding the foregoing, please contact the undersigned.

Sincerely,

Kathleen A. Kirby

Attachment



STATEMENT OF CYNTHIA M. JACOBSON, P.E.
IN SUPPORT OF A REQUEST FOR EXTENSION OF TIME
FOR A SPECIAL TEMPORARY AUTHORITY
TO OPERATE NIGHTTIME AT INCREASED POWER
TO MITIGATE CUBAN INTERFERENCE
WORL - ORLANDO, FLORIDA
950 kHz - 12 kW Day / 5 kW Night - DA-N
Facility ID: 48731

Applicant: Salem Communications Holding Corporation

I am a Consulting Engineer, 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. I am a Registered Professional Engineer in the Commonwealth of Virginia, Registration No. 027914.

GENERAL

This office has been authorized by Salem Communications Holding Corporation, ("Salem") licensee of Standard Broadcast Station WORL, Orlando, Florida, to prepare this statement setting forth supporting information for an Extension of Time for a Special Temporary Authority, granted July 28, 2010, permitting radio station WORL, Orlando, Florida, to operate with 10 kW during nighttime hours while utilizing the station's licensed nighttime directional antenna system to mitigate Cuban interference.

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STATEMENT OF CYNTHIA M. JACOBSON, P.E. WORL – ORLANDO, FLORIDA PAGE 2

WORL is experiencing interference from a co-channel Cuban station, CMBD, La Habana, Cuba. The North American Regional Broadcasting Agreement provides for a 950 kHz, 10 kW assignment at Habana, utilizing a nighttime directional antenna system with fields toward any United States station suppressed to no greater than 201.2 mV/m at 1 km (125 mVm at 1 mile). The NARBA data for this station is as follows:

CMBF (old call), 950 kHz, Habana, CU

10 kW DA-U Theo. RMS = 1017.1 mV/m@km

Coordinates 23-04-57, 82-27-41

| <u>Field</u> | <u>Phase</u> | <u>Spacing</u> | <u>Orient</u> | <u>Height</u> | <u>Reference</u> |
|--------------|--------------|----------------|---------------|---------------|------------------|
| 1.00 | 0 | 0 | 0 | 104 | 0 |
| | | | | | |
| 1.00 | -70 | 120 | 155 | 104 | 0 |

This directional antenna pattern meets the NARBA criteria for radiation suppression to 201.0 mV/m at 1 km. It has been verified by observation, (as well as provided in an authoritative publication, the 2016 World Radio TV Handbook), the La Habana facility, call letters CMBD, operates with 10 kW using a <u>non-directional</u> antenna system.

In accordance with the provisions established by the Commission permitting increases in power to offset interference received by unlawful Cuban broadcast facilities, technical personnel at WORL have been observing the received field strength for no less than a five-minute duration periodically since December 15, 2009. Readings are taken

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STATEMENT OF CYNTHIA M. JACOBSON, P.E.

WORL - ORLANDO, FLORIDA

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at the same location, employing the same field meter as specified in the original

engineering exhibit for the STA request. Measurements are included herein for the

November 2022 to May 2023 time period. The results of these observations are

attached in tabular form (see Figure 1) that substantiate the existence of a Cuban

broadcast facility which results in measured field strengths far exceeding those

anticipated from the facility described in NARBA. The measurement values are

consistent with previous measurements.

SUMMARY

It is submitted that both sets of measurements support a continued operation at 10

kW for WORL to enable the station to offset, in part, substantial interference received

from the currently operating Cuban station, CMBD.

This statement was prepared by me and is believed to be true and correct, under

penalty of perjury.

DATED: May 23, 2023

WORL Cuban interference readings (taken weekly):

| 11.20.22 | 11:07pm-11:24pm min $0.60 mV/m$ max $1.05 mV/m$ median $.95 mV/m$ Received WORL $8.3 mV/m$ 59° rain |
|----------|---|
| 11.27.22 | 11:15pm-11:29pm min 0.50mV/m max 0.95mV/m median 0.80mV/m Received WORL 8.0mV/m 71° partly cloudy |
| 12.5.22 | 11:16pm-11:30pm min $0.55 mV/m$ max $1.00 mV/m$ median $0.80 mV/m$ Received WORL $8.2 mV/m$ 65° fair |
| 12.12.22 | 11:22pm-11:35pm min 0.75mV/m max 1.10mV/m median 0.95mV/m Receiver WORL 8.0 mV/m $- 8.8$ mV/m $- 61$ $^{\circ}$ fair |
| 12.19.22 | 11:06pm-11:20pm min 0.50mV/m max 1.15mV/m median 0.95 mV/m Received WORL 8.0mV/m 58° mostly cloudy |
| 12.26.22 | 11:09pm-11:20pm min 0.70mV/m max 1.00mV/m median 0.85 mV/m Received WORL 8.0mV/m 66° partly cloudy |
| 1.2.23 | 11:11pm-11:25pm min $0.55mV/m$ max $1.15mV/m$ median 1.00 mV/m Received WORL $8.4mV/m$ 65° fair |
| 1.8.23 | 11:10pm-11:20pm min 0.70mV/m max 1.00mV/m median 0.90 mV/m Received WORL 8.2mV/m 61° parttly cloudy |
| 1.15.23 | 11:04pm-11:16pm min 0.55mV/m max 1.00mV/m median 0.85mV/m Received WORL 8.4 mV/m 45° fair |
| 1.22.23 | 11:20pm-11:40pm min 0.50mV/m max 1.05mV/m median 0.95 mV/m Received WORL 8.2 mV/m 70° fair |
| 1.29.23 | 11:13pm-11:36pm min 0.60mV/m max 1.05mV/m median 0.95 mV/m Received WORL 8.4mV/m 67° partly cloudy |
| 2.5.23 | 11:12pm-11:36pm min 0.40mV/m max 1.15mV/m median 1.05 mV/m Received WORL 8.5 mV/m 62° mostly cloudy |
| 2.12.23 | 11:19pm-11:31pm min 0.65 mV/m max 1.20mV/m median 1.05mV/m Received WORL 8.6 mV/m 56 ° fair |
| 2.19.23 | 11:22pm-11:33pm min 0.50mV/m max 1.00mV/m median 0.85mV/m Received WORL 8.2mV/m 68° fair |
| 2.26.23 | 11:13pm-11:23pm min $0.55 mV/m$ max $1.00 mV/m$ median $0.85 mV/m$ Received WORL $8.4 mV/m$ 66° fair |

| 3.4.23 | 11:30pm-11:41pm min 0.70mV/m max 1.00mV/m median 0.80mV/m Received WORL 8.2mV/m 72° cloudy |
|---------|--|
| 3.12.23 | 11:22pm-11:31pm min 0.50mV/m max 1.05mV/m median 0.90mV/m Received WORL 8.1 mV/m 71° fair |
| 3.19.23 | 11:11pm-11:20pm min $0.50mV/m$ max $1.00mV/m$ median $0.85mV/m$ Received WORL $8.3mV/m$ 56° rain |
| 3.26.23 | 11:21am-11:33am min $0.35 mV/m$ max $0.95 mV/m$ median $0.80 mV/m$ Received WORL $8.0 mV/m$ 77° mostly cloudy |
| 4.2.23 | 11:08pm-11:22pm min 0.40mV/m max 1.00mV/m median 0.85mV/m Received WORL 7.9mV/m $$ 72° partly cloudy |
| 4.9.23 | 11:11pm-11:21pm min $0.40 mV/m$ max $1.05 mV/m$ median $0.85 mV/m$ Received WORL $7.9 mV/m$ 67° cloudy |
| 4.16.23 | 11:11pm-11:23pm min 0.40mV/m max 1.05mV/m median 0.85mV/m Received WORL 7.8mV/m $$ 70° cloudy |
| 4.23.23 | 11:15pm-11:28pm min 0.30mV/m max 1.00mV/m median 0.80mV/m Received WORL $8.0mV/m$ 71° fair |
| 4.30.23 | 11:09pm-11:21pm min 0.30mV/m max 1.00mV/m median 0.75mV/m Received WORL 7.9mV/m $$ 67° fair |
| 5.7.23 | 11:19pm-11:32pm min 0.50mV/m max 1.00mV/m median 0.80mV/m Received WORL 8.0 mV/m 69° fair |
| 5.14.23 | 11:18pm-11:29pm min 0.45mV/m max 1.00mV/m median 0.80mV/m Received WORL 8.2mV/m 72° partly cloudy |
| 5.21.23 | 11:09pm-11:22pm min 0.35mV/m max 0.90mV/m median 0.70mV/m Received WORL 8.0mV/m 78° mostly cloudy |

^{***}Readings taken at same location and with the same field meter as specified in the original engineering exhibit for the STA request