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September 20, 2010

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

Re: Station KDLG(AM)
Dillingham, Alaska
FIN 16932
FRN: 0001572973

Dear Ms. Dortch:

On behalf of Dillingham City Schools, licensee of noncommercial educational Station KDLG(AM), Dillingham, Alaska, we hereby request the issuance of an experimental authorization, pursuant to Section 73.1510 of the rules, in order to operate the station for up to one year with controlled carrier amplitude determined by modulation density, referred to as "dynamic carrier control" (DCC). The station would otherwise be operated at normal license parameters.

The licensee is making this request in cooperation with the Alaska Public Broadcasting Commission (APBC), which is investigating the possible use of DCC to reduce operating expenses for the state's noncommercial AM stations, which are generally hard-pressed to meet power expenses in view of the high cost of rural electricity. The FCC on June 24, 2010 granted experimental authority for DCC testing on Station KOTZ(AM), Kotzebue, Alaska. Stations KOTZ and KDLG are noncommercial stations in remote rural Alaska.

The KOTZ grant was based on a detailed engineering statement explaining that DCC is in widespread use throughout the world and results in very substantial power savings. That licensee's request set forth a plan of experimentation to determine if DCC could help to reduce expenses while maintaining reliable operations. APBC had been informed by Nautel that the

DCC apparatus manufactured by Nautel would work on all of the State stations' 10 kW AM transmitters, both Harris and Nautel. However, preliminary testing under the KOTZ authority has shown that the Nautel box is incompatible with the Harris DX-10 transmitter, which would not properly transmit DCC modulation. The engineers traced the problem to a DC control loop in the DX-10 that attempts to keep that carrier at a "normal" level. Disabling of the circuit could, under certain circumstances, damage the power amplifiers in the transmitter.

It will be several weeks before Harris can deliver the equipment for KOTZ to conduct tests. Meanwhile, Nautel confirms that the XR-12 Nautel transmitter in service at Station KDLG will function properly in DCC mode and all concerned are eager to begin testing before snow and wind complicate travel in a few weeks. Authority is therefore sought for similar experimentation at Station KDLG.

As noted in connection with the KOTZ experimental authorization, the results of this experiment will be of critical importance for all of the similarly situated rural Alaska AM licensees that face budget challenges amid very high electricity costs. The experiment therefore promises, if successful, to lead to improvement of the technical phases of AM broadcast operation.

Pursuant to Section 1.1116 of the rules, this application is not subject to a filing fee because the applicant is a noncommercial educational licensee requesting an experimental authorization.

The applicant is exempt from the certification requirements in connection with Section 5301 of the Anti-Drug Abuse Act of 1988 because, as a public school agency, it is a governmental entity within the meaning of Section 1.2002(c) of the rules. See Order released February 5, 1993 (FCC 93-22).

Please address any questions concerning this application to this office.

Very truly yours,

SCHWARTZ, WOODS & MILLER

By: Lawrence M. Miller

LMM/nmc