

February 22, 2010

**VIA HAND DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., TW-A325  
Washington, D.C. 20554

**Re: Request for Program Test Authority to Operate at Reduced Power  
KLKI(FM), Dolan Springs, Arizona (FIN: 90917)**

---

Dear Ms. Dortch:

On behalf of Educational Media Foundation ("EMF"), permittee of KLKI(FM), Dolan Springs, Arizona, this letter is to request program test authority ("PTA") to allow EMF to operate KLKI(FM) at reduced power.

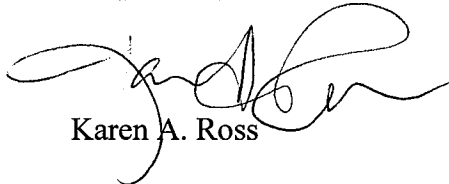
On January 25, 2010, EMF filed the KLKI(FM) covering license application and concurrently requested PTA. See FCC File No. BLED-20100125ADU. On January 29, 2010, the Commission denied EMF's request for PTA, File No. 20100125AIO, due to the potential for human exposure to radiofrequency radiation ("RFR") in excess of applicable safety standards. By its letter, the Commission requested that EMF provide an amendment to the license application, within 30 days, to provide documentation of compliance with the Special Operating Conditions in the construction permit related to RFR compliance. See BMPED-20100104AAJ. EMF is currently working toward moving the station antenna to a location on the tower that will eliminate the aforementioned RFR issues, but because it involves the coordination of several parties, including the landlord, a co-tenant on the tower and possibly the Bureau of Land Management, the process is taking longer than anticipated. Accordingly, EMF hereby requests an extension of time, up to and including May 29, 2010, within which to amend the KLKI(FM) license application. In the interim, EMF requests program test authority to allow KLKI(FM) to operate at approximately 60% of its authorized power. EMF's engineer has conducted RFR measurements which confirm that KLKI(FM) can operate at reduced power, at its authorized site, without exceeding the applicable human exposure limits. A copy of the results and declaration of EMF engineer, John Cook, is attached as Exhibit A.

Grant of program test authority at reduced power is in the public interest, as it will allow for the commencement of service to the public and enable the community of Dolan Springs, Arizona to receive the noncommercial, educational programming broadcast over KLKI(FM).

Marlene H. Dortch, Secretary  
February 22, 2010  
Page 2

Should there be any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Karen A. Ross', with a large, stylized flourish extending to the right.

Karen A. Ross

cc: Susan Crawford – FCC (Via Email)  
Enclosure

**EXHIBIT A**

### **Declaration: Radiofrequency Electromagnetic (RF) Measurements**

I, John C. Cook, hereby declare under penalty of perjury:

#### **Background:**

1. I am employed by Educational Media Foundation (EMF) as a Broadcast Engineer. My responsibilities include testing to verify technical compliance with FCC rules at certain of EMF's broadcast facilities, including FM radio station KLKI, Dolan Springs, Arizona.
2. KLKI(FM) has been constructed on an existing communications site shared by a number of other facilities. On 02/09/2010, I used EMF's Narda NBM-550 RFR measurement equipment (meter serial number B-0755 and probe serial number 01057) which uses a "shaped probe," to evaluate radiofrequency exposure compliance at the KLKI(FM) transmitter site.

#### **Test Procedures:**

3. In performing the measurements, I slowly walked from the base of the tower to approximately 100m from the tower along eight approximately equally-spaced radials, terrain permitting. As I walked, I slowly moved the probe between 2 and 8 feet above ground, and from side to side, seeking, and noting, the highest "overall" readings. In addition to the eight radials, I also investigated areas that appeared to have the potential for higher readings, including inside the transmitter building and the area immediately around the KLKI(FM) tower.

#### **Results:**

4. I made measurements with the KLKI(FM) transmitter operating at approximately 100% of the ERP indicated on the construction permit. I found what appears to be an RF "hot spot," contained within an area approximately 10m by 20m, in front of the antenna, west of the transmitter site, just outside the transmitter site gate in the site access road. All other locations appear to comply with the uncontrolled/public exposure limits of OET-65.
5. I also made measurements using the concept of spatial averaging throughout the "hot spot". These measurements indicated a RF level greater than the uncontrolled/public exposure limits of OET-65.
6. In an attempt to find a power level for KLKI(FM) that does comply with the uncontrolled/public exposure limits of OET-65, I made measurements at various power levels. With KLKI(FM) operating at approximately 70% of the ERP indicated on the construction permit, the highest reading found from all facilities was 123.00% of the uncontrolled/public exposure limits of OET-65. With KLKI(FM) operating at approximately 60% of the ERP indicated on the construction permit, the highest reading found from all facilities was 77.20% of the uncontrolled/public exposure limits of OET-65.
7. According to these measurements and the indicated RF levels, it would appear that with KLKI(FM) operating at approximately 60% of the ERP indicated on the construction permit, KLKI(FM) is in compliance with the uncontrolled/public exposure limits of OET-65. This value is below the FCC limits for human exposure to RF fields. Therefore no additional fencing or warning signs would be required to operate at 60% of the ERP, until modifications

to the antenna position on the tower are made in an effort to permanently resolve this problem.

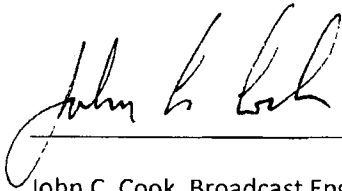
**Conclusion:**

8. The measurements indicate that with KLKI(FM) operating at approximately 60% of the ERP indicated on the construction permit, both KLKI(FM) and the other facilities in the vicinity comply with the radiofrequency exposure limits of OET-65.

The foregoing is true and correct to the best of my knowledge and belief.

February 19, 2010

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "John C. Cook", is written over a horizontal line.

John C. Cook, Broadcast Engineer  
Educational Media Foundation