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March 4, 2011

Carrie A. Ward, Esq.
Entercom Communications Corp.
401 City Avenue, Suite 809
Bala Cynwyd, Pennsylvania 19004

Re: WMFS (AM), Memphis, Tennessee
Facility Identification Number: 34374
Entercom Memphis License, LLC
Special Temporary Authority

Dear Counsel:

This is in reference to the request filed March 1, 2011, on behalf of Entercom Memphis License, LLC ("Entercom"). Entercom requests special temporary authority ("STA") to operate Station WMFS with emergency antenna facilities pursuant to Section 73.1680.¹ In support of the request, Entercom states that the station's nighttime directional antenna system has been damaged by copper vandalism and is not operational. Entercom states that it has restored nighttime operation with an emergency nondirectional antenna and reduced power of 1.25 kW, and requests STA for continued use of the emergency antenna until repairs are completed.

Section 73.1680 of the Commission's rules provides for operation with emergency antenna facilities following damage to authorized antenna systems, provided that an informal request for continued use of an emergency antenna is filed with the Commission within 24 hours. In particular, Section 73.1680(b)(1) provides that AM stations using an emergency nondirectional antenna in lieu of authorized directional facilities shall operate with power reduced to 25 percent or less of the nominal licensed power, or a higher power, not exceeding licensed power, while insuring that the radiated field strength does not exceed that authorized in any given azimuth.

Accordingly, the request for STA IS HEREBY GRANTED. Station WMFS may continue to operate during nighttime hours with an emergency nondirectional antenna and reduced power not to exceed 1.25 kW. Following restoration of nighttime directional operation, authority also is granted, if necessary, for operation with parameters at variance and/or reduced power while maintaining monitor points within licensed limits, pending the filing and processing of an application for direct measurement of operating power. It will be necessary to further reduce power or cease operation if complaints of interference are received. Entercom must notify the

¹ WMFS is licensed for operation on 680 kHz with 10 kW daytime and 5 kW nighttime, employing a directional antenna during nighttime hours only (DA-N-U).

Commission when licensed operation is restored.² Entercom 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 **September 4, 2011**.

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,

A handwritten signature in blue ink, appearing to read "Charles N. Miller", with a stylized flourish at the end.

Charles N. Miller, Engineer
Audio Division
Media Bureau

cc: Entercom Memphis License, LLC

² *See* 47 CFR §§ 73.45(c), 73.51, 73.54, 73.61(b).