Law Office of
DENNIS J. KELLY
Post Office Box 41177
Washington, DC 20018

TELEPHONE: 888-322-5291
202-293-2300

MEMBER, DISTRICT OF COLUMBIA BAR ONLY;
PRACTICE LIMITED TO FEDERAL COURTS AND AGENCIES

TELECOPIER: 410-626-1794
E-MAIL: dkellyfcclaw1@verizon.net

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FILED/ACCEPTED

MAY 26 2011

Federal Communications Commission
Office of the Secretary

Honorable Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Attention: Mr. Rodolfo Bonacci
Audio Division, Media Bureau

RE: WKQB(FM), Pocahontas, Virginia
FCC Facility ID # 52864
Special Temporary Authorization Request
File No. BSTA-20110523AFV

Dear Madame Secretary:

On behalf of our client West Virginia-Virginia Media, LLC (WV-VM), this is to supplement a request for a Special Temporary Authorization (STA) which was electronically filed on May 23, 2011. The required $170.00 filing fee was paid by credit card, and the Commission has accepted this request for filing as of today. As the CDBS electronic filing system does not appear to allow for amendments to pending STA requests, we are submitting revisions to the electronically filed STA request through this letter.

WV-VM has constructed an FM facility pursuant to a construction permit, File No. BPH-20080219AST, authorizing a relocation of station WKQB (formerly WELC-FM) from Welch, West Virginia to Pocahontas, Virginia. On May 23, 2011, WV-VM filed both an FCC Form 302-FM application, File No. BLH-20110523AFW, and an FCC Form 301 application, File No. BMPH-20110523AFU. The Form 301 application was required because in the course of constructing the WKQB Pocahontas facility, two issues arose: first, it was discovered that the actual geographic coordinates of the tower specified by WV-VM in the 2008 construction permit application, ASR #1219321, were "off" by 4 seconds of latitude and 19 seconds of longitude; and second, the construction crew determined that the transmitting antenna could not be installed at the location on the tower allowed by BPH-20080219AST, and had to be installed some 21 meters lower on the tower.

Therefore, WV-VM seeks an STA to operate its new Pocahontas facility with 100 watts of effective radiated power at an antenna height 442 meters above average terrain, at NAD27 coordinates North 37° 17′ 12″ Latitude, West 81° 23′ 30″ Longitude. An engineering statement prepared by technical consultant David J. Doherty of Millbury, Massachusetts, whose qualifications are known to the Commission, is attached. It establishes that the requested STA facility's 60 dBu contour does not exceed the 60 dBu contour authorized in BPH-20080219AST.

It is to be pointed out that WV-VM does not own the tower supporting the WKQB transmitting antenna at Pocahontas, and that the tower owner has informally given WV-VM assurances that it will arrange for a correction of the tower coordinates with the FCC's Antenna Structure Registration system.

The public interest, convenience and necessity would be well served by a grant of this STA, which will permit WKQB to operate with its improved technical facility.

Should additional information be desired in connection with the above matter, kindly communicate with this office.

Very truly yours,

Dennis J. Kelly

Comprehensive Technical Statement
in support of
WEST VIRGINIA - VIRGINIA MEDIA, LLC

WKQB (formerly WELC-FM), Facility ID 52864

STA Request

Channel 275A, 102.9 MHz
0.100 kW @ 442 m HAAT

Introduction

On February 19, 2008, Pocahontas Broadcasting Company proposed modifications to its WELC-FM that included changes to the following parameters:

Principal community
Allocation coordinates
Transmitter location
Antenna height
ERP
Add 73.215 processing

In preparing to construct the facility, it was discovered that the coordinates used in the application, which were in good faith based on the ASR data for the proposed tower, were incorrect. The modification filed contemporaneously with this STA request proposes to change the following items from the approved Construction Permit:

Transmitter location
Antenna height

In addition, during the process of mounting the antenna on the tower, it was discovered that it would be impossible to mount the antenna at the planned height above ground. Therefore, the following parameters were also included in the modification:

Antenna height
Effective Radiated Power

No other changes were proposed.

With the exception of the unanticipated problem in mounting the antenna at the planned height, the facility has been physically constructed as contemplated in the original Construction Permit application.

This STA requests temporary operation from the constructed facility at an ERP that is sufficient to provide 70 dBu f(50,50) service to 100% of the principal community and does not extend the 60 dBu proposed in the Construction Permit application.

Terrain Data

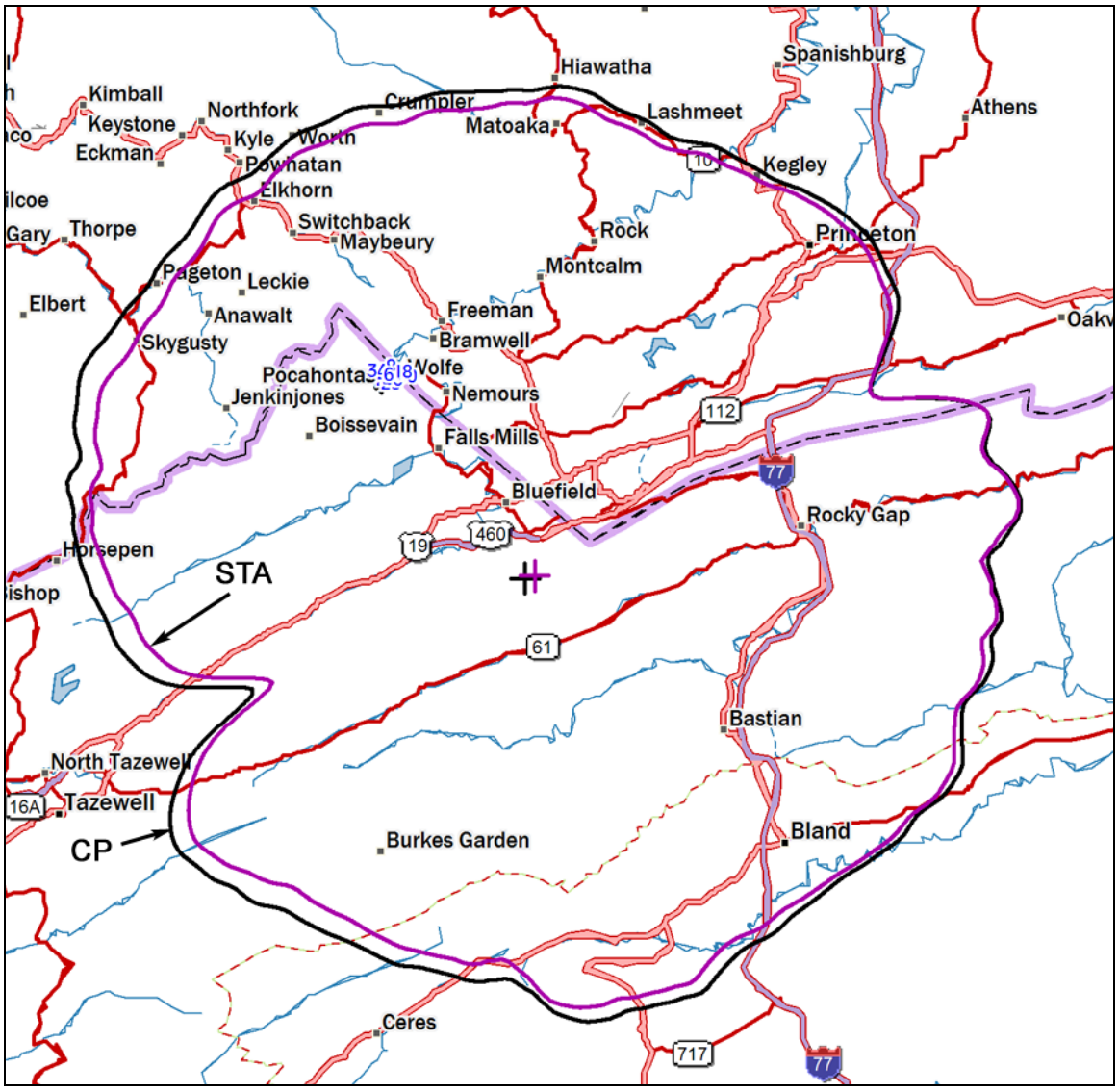
All calculations of coverage, interference, and height above average terrain were developed using the FCC online HAAT calculator, which uses 30-second terrain data.

Height Above Average Terrain

The site elevation is 1158 meters above mean sea level. The antenna was actually mounted at 108 m above ground, and 1266 meters above mean sea level.

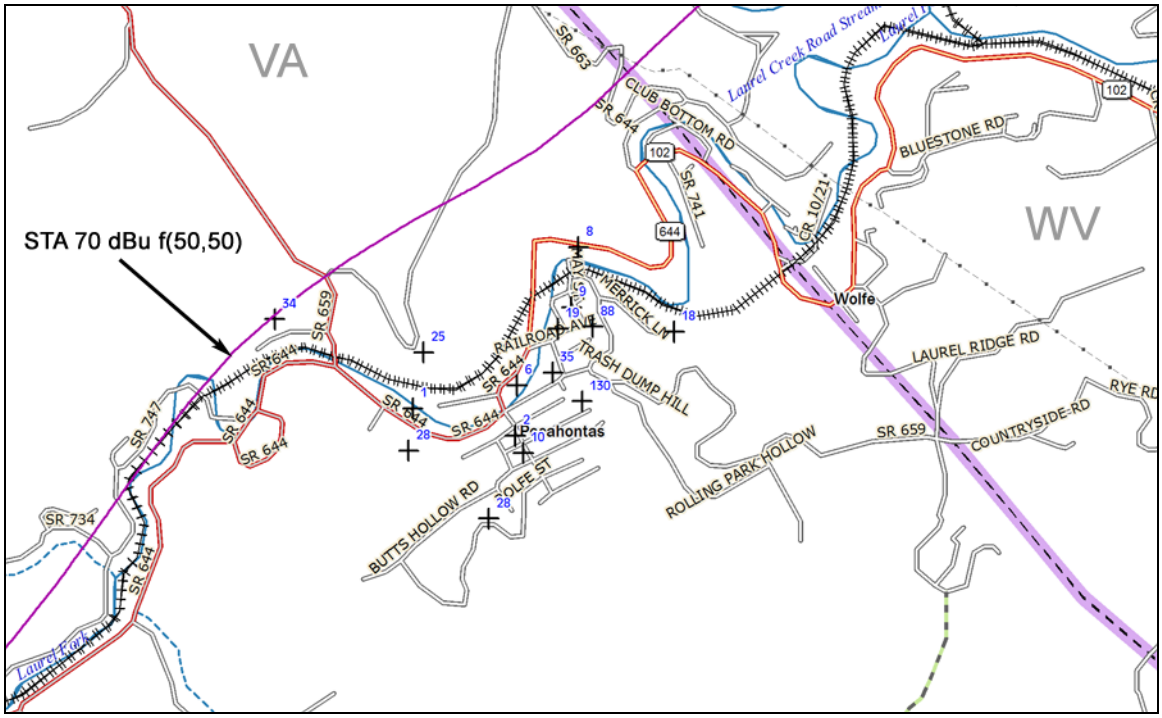
The FCC Height Above Average Terrain calculator returns an eight-radial HAAT of 442 meters. A copy of the output from the calculator is attached.

60 dBu Comparison



The STA 60 dBu f(50,50) contor, shown in magenta, does not extend the CP 60 dBu f(50,50) contour, shown in black.

Service to Principal Community



The principal community of Pocahontas falls within the proposed 70dbu f(50,50) contour.

100% of the population of Pocahontas Town falls within the proposed 70dbu f(50,50) contour.

RF Exposure

The antenna is centered at 108m above ground level. The STA ERP will be 100W-H plus 100W-V, for a total of 200W.

FMModel returns an exposure level of less than 0.4μW/cm^2 or 0.2% of the limit for casual exposure, for the worst-case antenna.

Appropriate warning signage and a security fence will be provided. The applicant commits to reducing power as necessary to protect workers on the tower.

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