

BML-20110422ACH

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April 22, 2011

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

FILED/ACCEPTED

APR 22 2011

Federal Communications Commission
Office of the Secretary

Re: Station KOTZ(AM)
Kotzebue, Alaska
FIN 35440
FRN: 0005057245

Dear Ms. Dortch:

On behalf of Kotzebue Broadcasting, Inc., licensee of noncommercial educational Station KOTZ(AM), Kotzebue, Alaska, we hereby request waiver of Section 73.1560(a) of the rules, "Operating power and mode tolerances", in order to operate the station with carrier amplitude controlled according to modulation density, often referred to as "Dynamic Carrier Control" (DCC). The licensee will otherwise operate the station at normal license parameters.

The Commission on June 24, 2010 granted experimental authority for DCC operation of Station KOTZ. The request and the experimental operation were coordinated by the Alaska Public Broadcasting Commission (APBC), which has led the investigation of the use of DCC to reduce operating expenses for the state's noncommercial AM stations in remote areas. Those stations, including Station KOTZ, are key information resources for their communities but are hard-pressed to meet power expenses in view of the high cost of rural Alaska electricity. As noted in the request for experimental authority and associated engineering materials, DCC is in widespread use throughout the world and results in very substantial power savings.

The attached Engineering Statement by the consulting engineering firm of Hatfield & Dawson reports that the experimental operations have been completely satisfactory. There have been very substantial power savings with no

perceptible loss of signal coverage or quality. The licensee therefore asks the Commission to accept that Engineering Statement as a report on experimental operations and requests permanent waiver of Section 73.1560(a) in order to obtain the advantages of DCC operation.

Pursuant to Section 1.1116(c) of the rules, this waiver request is not subject to a filing fee because the applicant is a noncommercial educational licensee.

The licensee has authorized us to certify on its behalf that neither it nor any party to this request is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

Please address any questions concerning this request to this office.

Very truly yours,

SCHWARTZ, WOODS & MILLER

By: Lawrence M. Miller
Lawrence M. Miller

Attachment
LMM/nmc

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ENGINEERING STATEMENT:

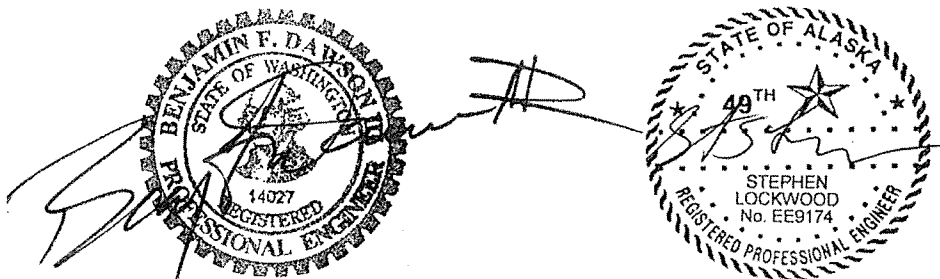
This Engineering Statement has been prepared on behalf of Alaska Public Broadcasting, Inc., and for those non-commercial educational AM broadcast stations in Alaska which may wish to employ controlled carrier operation as a means of reducing primary power costs.

Stations KOTZ and KDLG* received experimental authority in June and September of 2010 to conduct operation with controlled carrier operation.** After installation of the necessary equipment and solution of minor installation and software matters the stations have both operated with controlled carrier operation for the past several months.

This operation has been completely satisfactory. KOTZ employs carrier reduction during periods of low or no modulation with 6 dB compression, carrier reduced to 2.5 kW with no modulation, while KDLG employs carrier reduction during modulation (BBC companding) with minimum power at 5.9 kW at 100% modulation, and both methods have resulted in substantial savings, in excess of 30%, in primary power reduction at their transmitter sites (this figure thus inclusive of all AC power consumption at each facility). During this period of time there have been no complaints or concerns by members of the public regarding any perceived impairments in audio quality or coverage of the stations. Because of the stations' unique circumstances their audiences are very perceptive and therefore quite likely to comment upon any service or quality reductions.

Based on this successful use of controlled carrier operation, therefore, this statement supports the request of those Alaska non-commercial educational AM stations as may wish to obtain appropriate waivers of §73.1560(a) of the Commission's Rules for the use of controlled carrier modulation.

March 29, 2011



Benj. F. Dawson III, P.E.

Stephen S. Lockwood, P.E.

* Facility ID numbers 35440 and 16932 respectively

** Several acronyms are used for such operation, the other most frequently employed being "Dynamic Carrier Control"