

**FEDERAL COMMUNICATIONS COMMISSION**  
**445 TWELFTH STREET SW**  
**WASHINGTON DC 20554**

**MEDIA BUREAU**  
**AUDIO DIVISION**  
**APPLICATION STATUS:** (202) 418-2730  
**HOME PAGE:** [www.fcc.gov/mb/audio/](http://www.fcc.gov/mb/audio/)

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October 19, 2011

Peter Tannenwald, Esq.  
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1300 North 17th Street, 11th Floor  
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Re: Escuela de la Raza Unida  
KERU-FM, Blythe, California  
Facility Identification Number: 19750  
Special Temporary Authority  
Petition for Reconsideration

Dear Counsel:

This is in reference to a Petition for Reconsideration filed October 17, 2011, on behalf of Escuela de la Raza Unida ("ERU"). ERU requests reconsideration of the staff's October 5, 2011, denial of a request for special field test authority ("SFTA") filed on October 4, 2011.

The staff denied ERU's request due to a substantial extension of the proposed 60 dBu contour beyond the currently licensed contour and a more than double increase in service area, stating that an increase of this magnitude is more properly considered within the context of an application for construction permit.

In its Petition, ERU argues that the purpose of the proposed test was to determine the suitability of the site, and that "the effort involved in a construction permit application would be wasteful in this instance, for both the licensee and the Commission." ERU states that the objective of the planned test operation is to determine the quality of service at Parker, Arizona, and states that the station and its listeners would suffer if a site change degraded coverage in Parker. ERU reiterates that the proposed test would be brief, at most three days. ERU further states that, if necessary, it is willing to suspend regular programming and broadcast just music.

On reconsideration, we find that the proposed brief test is not likely to result in interference to any other station, and that, with the limitations agreed to by ERU in its Petition, is not likely to cause a disruptive, temporary establishment of service.

Accordingly, the Petition for Reconsideration IS GRANTED and the request for SFTA IS GRANTED with conditions. Call sign KE7XRU is assigned to the test station. Station KE7XRU

may operate with the following facilities:

Transmitter site:	Cunningham Peak, near Ehrenberg, Arizona
Geographic Coordinates:	33° 34' 12" N, 114° 20' 56" W (NAD 1927)
Channel:	203 (88.5 MHz)
Effective Radiated Power:	1 kilowatt (Max-DA, H&V)
Antenna manufacturer and type	Kathrein/Scala, model CA5FM-CP, directional
Antenna orientation:	0° True
Antenna elevation	
Above ground:	8 meters
Above mean sea level:	1015 meters
Above average terrain:	669 meters

Operation shall be limited to the minimum time necessary for the planned testing, not to exceed three days. Waiver of Section 73.1515(c)(2) is granted to permit the use of modulated signals; modulation shall consist of recorded music plus hourly station identifications. Operation of Station KERU-FM shall be discontinued during operation of the test station. It will be necessary to cease SFTA operation or reduce power if complaints of interference are received. Within 60 days following the termination of the SFTA operation, a report pursuant to Section 73.1515(c)(7) shall be filed with the Commission.

This authority expires on **November 19, 2011**.

Sincerely,



Charles N. Miller, Engineer  
Audio Division  
Media Bureau

cc: Escuela de la Raza Unida