

FEDERAL COMMUNICATIONS COMMISSION
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October 26, 2011

Brian C. Edwards
Global Radio, LLC
2131 Crimmins Lane
Falls Church, Virginia 22043

Re: WNWR(AM), Philadelphia, Pennsylvania
Facility Identification Number: 1027
Global Radio, LLC
Special Temporary Authorization

Dear Mr. Edwards:

This is in reference to the request filed October 25, 2011, on behalf of Global Radio, LLC ("GR"). GR requests special temporary authority ("STA") for operation of Station WNWR with parameters at variance from licensed values and/or reduced power while maintaining monitor points within licensed limits, with a temporary nondirectional antenna and reduced power, and with its substantially adjusted daytime directional antenna pattern.¹

In support of the request, GR states that it plans repairs and renovations to the WNWR antenna system, and that it plans to conduct a proof of performance based on Method of Moments ("MOM") analysis, pursuant to Section 73.151(c).

Our review indicates that the proposed STA operation complies with the technical provisions of Section 73.1615, which governs operation during modification of facilities. Our review further indicates that, due to the derivation of new operating parameters via MOM analysis, neither the currently licensed antenna monitor readings nor the licensed monitor point field strength limits will necessarily be applicable to the proposed STA operation with MOM-derived operating parameters.

Accordingly, the request for STA IS HEREBY GRANTED. Station WNWR may operate with parameters at variance and/or reduced power while maintaining monitor points within licensed limits. Operation also is authorized with a temporary nondirectional antenna and reduced power not to exceed 12.5 kilowatts, only as necessary to facilitate the planned repair work. Following completion of necessary repairs, modifications and adjustments, Station WNWR may operate with its substantially adjusted daytime directional antenna system pending the filing and processing of an application for modification of license supported by a MOM proof of performance pursuant to 47 C.F.R. Section 73.151(c). During this mode of operation, operating parameters shall be maintained within $\pm 5\%$ current ratios and $\pm 3^\circ$ phase of the MOM-derived

¹ WNWR is licensed for operation on 1540 kHz with 50 kilowatts, daytime hours only, employing a directional antenna (DA-D-D).

parameters, which shall be posted with the station license along with a copy of this letter. It will be necessary to reduce power or cease operation if complaints of interference are received. GR 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 **April 26, 2012**.

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,



Charles N. Miller, Engineer
Audio Division
Media Bureau

cc: Global Radio, LLC