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VIA HAND DELIVERY

July 8, 2011

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

Re: Request for Waiver and Tolling of Construction Permit Period
KLGGM (FM), Kellogg, ID (ID 172927)
KPBGM (FM) Oroville, WA (ID 173880)

Dear Ms. Dortch:

Spokane Public Radio ("SPR"), permittee of FM radio stations KLGGM (FM), Kellogg, ID and KPBGM (FM), Oroville, WA., submits this letter to request a waiver of the three year construction permit deadline set forth in Section 73.3598(a) and tolling of the construction permit period pursuant to Section 73.3598(b). This request is also filed pursuant to the Commission's Report and Order in the Matter of 1998 Biennial Regulatory Review-Streamlining of Mass Media Applications, Rules and Processes ("Streamlining Order"). The CPs for the two stations were granted on July 17, 2008 and expire on July 17, 2011.

Extreme weather conditions, have delayed completing this project in a timely manner. Those problems are described in the attached Declaration Under Penalty of Perjury, provided by Spokane Public Radio chief engineer Jerry S Olson.

There are a number of instances where the Commission has previously recognized extreme weather as a proper basis for a waiver of 73.3598(a). See, e.g., Letter from Peter H. Doyle, Chief Audio Division to Mark N. Lipp, counsel to Multicultural Radio Broadcasting, Inc. (September 26, 2003) ("WAZN") (FCC granting a 45 waiver due to significant precipitation); Letter from Peter H. Doyle, Chief Audio Division to Allan G. Moskowitz, counsel to Langer Broadcasting Corporation, (September 15, 2003) ("WBIX") granting a 45 day waiver due to significant precipitation); Letter from Peter H. Doyle, Chief, Audio Division to Peter Gutmann, counsel to JCM Broadcasting Co., LLC (July 2, 2001) ("KLIQ") granting a month waiver due to significant precipitation and wind).

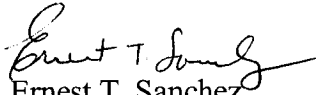
SPR Tolling Request
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Accordingly, SPR requests that the Commission waive or toll the above captioned construction permit, for a period of ninety (90 days), to reflect the delay in construction caused by exceptional circumstances beyond SPR's control.

Pursuant to Section 1.3 of the Commission's Rules, the Commission may suspend, revoke, amend or waive any of its rules for good cause shown. See 47 C.F.R. §1.3. Generally, a waiver will be granted upon a showing of good cause and where grant of the extension will serve the public interest. See *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir.1969), cert denied. 409 U.S. 1027(1972). SPR submits that the public interest will be served by a grant of this waiver.

Please let me know if you have questions about this request.

Sincerely,



Ernest T. Sanchez
Counsel for Spokane Public Radio

CC: Peter Doyle, FCC, Audio Division

DECLARATION

My name is Jerry S. Olson. I am the chief engineer for Spokane Public Radio, and have served in the role for approximately 15 years.

Two of my responsibilities are to oversee the technical construction of the Kellogg, ID facility KLGK and the Oroville, WA facility KPBG, both granted to Spokane Public Radio in 2008. I formally request a ninety-day extension of these construction permits.

The KLGK site, commonly known as Wardner Peak, rises 1904 meters AMSL. Access to the site is tenuous. Impassible in the winter, access is typically possible in late springtime or early summer with the use of all-terrain vehicles. Typically, beginning in late summer, the weather window permits the use of four-wheel drive trucks before the first snow fall. Knowing that time was running short, I employed a snow cat in May of 2011, to survey the site. While expensive, the snow cat was the only means by which to access this remote location. Upon reaching the communication facility, high drifts prevented entry. However, I did assess the tower and made plans for the weather window I anticipated in summer.

On July 7, 2011, fully expecting that warm weather had reached the high country, I coordinated a trip up to the site with the Kellogg fire chief who is responsible for the communication building on Warner Peak. This was the first time he had been up the mountain this year due to our extreme winter and late season snowfall. Once atop the peak, 10-foot drifts prevented delivery of the gear. Furthermore, it will be some weeks before site conditions allow installation. While I fully anticipated completing the project by July 17th, conditions did not allow.

The KPBG project was another casualty of our abnormal winter. The project, located atop Pickens Mountain in WA, is also located remotely and has its own weather-window issues. However, it was not the snow on site that prevented construction, but overall harshness of the winter and its effects on our broadcast network that took me away from this project. The effects of the ice, snow, and wind on distant equipment necessitated many emergency trips to the hinterlands. Each trip robbed me of precious time as each took an entire day's travel. Also, complications have arisen in nearby transmitters atop Mica Peak, KPBX, and Lookout Mountain, KSFC and KPBY, especially with the HD component of KPBX. These complications are ongoing frustrations that have comprised our construction schedule.

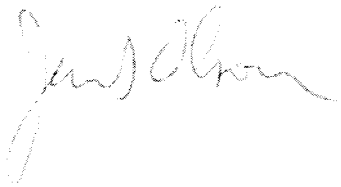
We are heavily invested in these projects. To lose construction permits at this time, due to unforeseen complications of an extraordinary winter would be extremely detrimental to Spokane Public Radio. Total project expenditures for KLGK, are \$17, 220.00 to date, and KPBG \$36, 433.00 to date.

While the construction permits granted three years of time for these projects, the three to four months of site accessibility hasn't allowed adequate time on site for completion.

The weather window, coupled with altitude, difficult terrain, and unusual snowfall amounts, produced a perfect storm of emergencies and equipment failure that greatly hampered my best efforts.

With a ninety day extension on these two construction permits, I can regain some of the time I have lost. I have the equipment on hand. In both cases, the gear is staged very near the sites.

I make this statement under penalty of perjury on this day of 7/8/2011

A handwritten signature in cursive script, appearing to read "J. Johnson".