

FEDERAL COMMUNICATIONS COMMISSION
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November 21, 2011

Donald E. Martin, Esq.
Box 8433
Falls Church, Virginia 22041

Re: WGTS (FM), Takoma Park, Maryland
Facility Identification Number: 12460
Columbia Union College Broadcasting, Inc.
Special Temporary Authorization

Dear Counsel:

This is in reference to the request filed November 18, 2011, on behalf of Columbia Union College Broadcasting, Inc. ("CUC"). CUC requests special temporary authority ("STA") to operate Station WGTS with temporary facilities.¹ In support of the request, CUC states that work is scheduled on the licensed tower which would require WGTS to cease operation when workers were in the aperture of its antenna. CUC proposes to operate temporarily from its formerly licensed facility in order to maintain service during the course of the work.

STA requests which involve a change in transmitter site must include four critical elements: (1) Loss of the licensed site must be beyond the licensee's control; (2) STA facilities must continue to provide service² to the licensed community; (3) STA facilities must maintain, as closely as practicable, the licensed service area³ without extending it; (4) STA facilities cannot involve the construction of towers intended for permanent use by the station requesting the STA. Our review indicates that the proposed STA operation complies with these criteria.

Accordingly, the request for STA IS HEREBY GRANTED. Station WGTS may operate with the following facilities:

Geographic coordinates:	38° 59' 12" N, 77° 00' 04" W (NAD 1927)
Channel	220 (91.9 MHz)
Effective radiated power:	27 kilowatts (H only)
Antenna height:	
above ground:	30 meters
above mean sea level:	117 meters
Above average terrain:	50 meters

¹ WGTS is licensed for operation on Channel 220B (91.9 MHz) with effective radiated power of 23.5 kilowatts (H&V) and antenna height above average terrain of 186 meters.

² For AM - 5 mV/m; for commercial FM - 3.16 mV/m; for noncommercial educational FM - 1.0 mV/m.

³ For AM - 0.5 mV/m contour; for FM - 1.0 mV/m contour.

CUC must notify the Commission when licensed operation is restored. CUC 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 **February 21, 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: Columbia Union College Broadcasting, Inc.