

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/

ENGINEER: Jerome J. Manarchuck
TELEPHONE: (202) 418-7226
FACSIMILE: (202) 418-1410
E-MAIL: Jerome.Manarchuck@fcc.gov

November 9, 2012

Mark N. Lipp
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006

Re: KYPA(AM), Los Angeles, CA
Multicultural Radio
Broadcasting Licensee, LLC
Facility Identification Number: 18273
License application: BMML-20111209KKR

Dear Counsel:

On January 26, 2012 a deficiency letter was sent out regarding the subject license application. On March 29, 2012, KYPA was granted an additional 30 days to respond to the deficiency letter. As of today, we have not received further response or an amendment to the application.


The original deficiency letter stated that the application had the following deficiencies.

1. Section 73.151(c)(1) requires a matrix of impedance measurements at the base of each element in the array, with other elements either short- or open-circuited at their respective bases. As the engineering exhibit notes, there are six towers at the site, two of which are used for KYPA. The impedance measurements were taken with the unused elements detuned instead of short- or open-circuited, as the rule requires.
2. The measurements made to determine the characteristic impedance of the sampling lines were not done as specified in the rules. Section 73.151(c)(2)(i) states that characteristic impedance shall be determined using open-circuit measurements "at frequencies corresponding to odd multiples of 1/8 wavelength immediately above and below the open circuit resonant frequency closest to carrier frequency."
3. The circuit calculations shown in Table 9A, performed to relate current magnitude and phase at the tower base, as computed by the moment method software, to the corresponding readings at the sample location, appear to show an incorrect phase shift.
4. As the Media Bureau's October 29, 2009, *Public Notice*¹ stated, the moment method proof should include a certificate or statement verifying that the antenna monitor is properly calibrated, as Section 73.69(3) requires.

¹ "Media Bureau Clarifies Procedures for AM Directional Antenna Performance Verification Using Moment Method Modeling," *Public Notice*, DA 09-2340 (2009).

Further action on the subject license application has been withheld until the applicant submits an amendment addressing the deficiencies described above. Failure to respond within 30 days from the date of this letter will result in dismissal of the application pursuant to 47 CFR Section 73.3568(a)(1).

Sincerely,


Jerome J. Manarchuck
Audio Division
Media Bureau

cc: Ted Schober