

Dale Bickel

From: sanpedrofilmfestival@gmail.com on behalf of San Pedro Film Festival
<ziggy@spiffest.org>
Sent: Monday, May 08, 2017 1:19 PM
To: Dale Bickel
Cc: BOB.BURCHETT@EEONTHEWEB.COM
Subject: Re: KCLA-LP BSTA-20170503ABJ dismissed 5/8 (Corrected)
Attachments: KCLA-LP--BSTA-20170503ABJ-StarlineDr (2).pdf

Dear Mr Bickel:

Please see attached pdf printout showing that the coordinates and antenna height were entered into the STA application, and the printout was made directly from the KCLA's CDBS account.

Please let me know if there's anything else you might need.

Best regards,

Ms. Ziggy Mrkich

On Mon, May 8, 2017 at 7:09 AM, Dale Bickel <Dale.Bickel@fcc.gov> wrote:

Correction: it is the engineering STA that is dismissed: BSTA-20170503ABJ. Dale Bickel

From: Dale Bickel
Sent: Monday, May 08, 2017 10:06 AM
To: 'ZIGGY@SPIFFEST.ORG' <ZIGGY@SPIFFEST.ORG>
Cc: 'BOB.BURCHETT@EEONTHEWEB.COM' <BOB.BURCHETT@EEONTHEWEB.COM>
Subject: KCLA-LP BSTA-20170504ABK dismissed 5/8

Mr. Mrkick:

Your request for Special Temporary Authority (BSTA-20170504ABK) IS DISMISSED, inasmuch as the request contains no coordinates (latitude and longitude), or site elevation above mean sea level, or height of the antenna radiation center above mean sea level . These are necessary for us to begin to determine the suitability of your proposal.

You may file a new request for STA containing the additional technical information and we will consider it.

Dale Bickel dale.bickel@fcc.gov

Senior Electronics Engineer

Audio Division, Media Bureau

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0386 (July 2002)	FOR FCC USE ONLY
Engineering STA		FOR COMMISSION USE ONLY FILE NO. BSTA - 20170503ABJ
Read Instructions/FAQ before filling out form		

Section I - General Information

1.	Legal Name of the Applicant KCLA LP FM		
	Mailing Address C/O CIVIC LIGHT OPERA SPIFFEST 303 S. PACIFIC AVE #102		
	City SAN PEDRO	State or Country (if foreign address) CA	Zip Code 90731 -
	Telephone Number (include area code) 3104475011		E-Mail Address (if available) ZIGGY@SPIFFEST.ORG
	FCC Registration No 0023132301	Call Sign KCLA-LP	Facility ID Number 197367
2.	Contact Representative (if other than licensee/permittee) ZIGGY MRKICH		Firm or Company Name KCLA-LP FM
	Mailing Address C/O CIVIC LIGHT OPERA SPIFFEST 303 S. PACIFIC AVE #102		
	City SAN PEDRO	State or Country (if foreign address) CA	ZIP Code 90731 -
	Telephone Number (include area code) 3104475011		E-Mail Address (if available) ZIGGY@SPIFFEST.ORG
3.	Purpose: <input checked="" type="radio"/> Engineering STA <input type="radio"/> Extension of Existing Engineering STA <input type="radio"/> Legal STA <input type="radio"/> Extension of Existing Legal STA		
4.	Service: FL		
5.	Community of License: City: SAN PEDRO State: CA		
6.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Noncommercial Educational Licensee/Permittee <input type="radio"/> Other <input type="radio"/> N/A (Fee Required)		

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX		
7.1.	Class: <input checked="" type="radio"/> LP100 <input type="radio"/> LP10	
7.2.	Channel: 264	
7.3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 33 Minutes 44 Seconds 46.2 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 118 Minutes 19 Seconds 50 <input checked="" type="radio"/> West <input type="radio"/> East	
7.4.	Antenna Structure Registration Number: <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA	
7.5.	Antenna Location Site Elevation Above Mean Sea Level:	360 meters
7.6.	Overall Tower Height Above Ground Level:	6.5 meters
7.7.	Height of Radiation Center Above Ground Level:	6.5 meters
7.8.	Effective Radiated Power	1.001 watts
7.9.	National Environmental Policy Act. The applicant certifies, based on its completion of Worksheets 2 and 3 and its review of the instructions to this application, that the proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the attached General Environmental and RF Exposure Worksheets, an Exhibit is required .	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 5]
8.	Please explain in detail the "extraordinary circumstances" which warrant temporary operations at variance from the Commission's Rules. In addition, please specify 1) the specific rules and/or policies from which the applicant seeks temporary relief; 2) how the public interest will be furthered by grant; and 3) the expected duration of the STA and the licensee's plan for restoration of licensed operation. If requesting variance with other than authorized technical facilities, please specify the exact facilities sought.	[Exhibit 6]
9.	Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I certify that I have prepared Engineering Data on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name ROBERT L. BURCHETT		Relationship to Applicant (e.g., Consulting Engineer) ENGINEERING CONSULTANT	
Signature		Date (mm/dd/yyyy) 5/3/2017	
Mailing Address 22826 MARIPOSA AVE			
City TORRANCE		State or Country (if foreign address) CA	Zip Code 90502 -
Telephone Number (No dashes or parentheses, include area code) 3105344456		E-Mail Address (if available) BOB.BURCHETT@EEONTHEWEB.COM	

I hereby certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing ZIGGY MRKICH		Typed or Printed Title of Person Signing MANAGER	
Signature		Date (mm/dd/yyyy) 5/3/2017	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 5
Description: ENVIRONMENTAL ANALYSIS

NON-IONIZING ELECTROMAGNETIC RADIATION (NEIR) ANALYSIS

THE EFFECTIVE RADIATED POWER FOR PROPOSED WILL BE 1.1 WATTS, MOUNTED ON A TOWER 6.5 METERS ABOVE GROUND. THE OET PROGRAM FM MODEL FOR WINDOWS, VERSION 2.10 BETA WAS USED TO DETERMINE THE MAXIMUM PREDICTED RF EXPOSURE. THE SETTINGS USED WERE:

ANTENNA: SHIVELY MODEL 6513/6510 VERTICAL DIPOLE (CLOSEST MATCH)
VERTICAL ERP (W): 1.1
HORIZONTAL ERP (W): 1.1
ANTENNA HEIGHT (M): 6.5
NUMBER OF ELEMENTS: 1
SPACING: 1

USING THESE SETTINGS, THE MAXIMUM PREDICTED RF EXPOSURE FOR A HUMAN STANDING ON THE GROUND WOULD BE LESS THAN .0008 $\mu\text{W}/\text{CM}^2$ AT 5M. THIS REPRESENTS LESS THAN 1% OF THE FCC MAXIMUM PERMISSIBLE EXPOSURE (MPE) OF 200 $\mu\text{W}/\text{CM}^2$ FOR UNCONTROLLED ENVIRONMENTS.

47 CFR 1.1307(B)(3) EXEMPTS APPLICANTS FROM PREPARING AN ENVIRONMENTAL ASSESSMENT WHEN THE PREDICTED EXPOSURE LEVELS WHEN THE PREDICTED EXPOSURE LEVELS WOULD BE LESS THAN 5% OF THE FCC LIMITS.

ANTENNA IS PROPOSED ON UNDEVELOPED PRIVATE PROPERTY. SIGNAGE WARNING CLIMBERS WILL BE POSTED. IF WORK ON TOWER IS REQUIRED, FACILITY WILL BE TEMPORARILY POWERED DOWN.

THE ATTACHED PDF PRINTOUT WAS GENERATED USING OET PROGRAM FM MODEL FOR WINDOWS, VERSION 2.10.

Attachment 5

Description
FM MODEL: NON-IONIZING ELECTROMAGNETIC RADIATION (NEIR) ANALYSIS

Exhibit 6
Description: REQUEST FOR STA

SPECIAL TEMPORARY AUTHORITY TO RESUME OPERATIONS AT INTERIM LOCATION PENDING FAA APPROVAL OF STRUCTURE FOR MODIFICATION APPLICATION.

PER APPLICATION # BPL-20160602ABB, KCLA-LP FM HAS A PENDING MODIFICATION FOR A MINOR MOVE TO A NEW LOCATION. UPON FILING, KCLA-LP WAS NOTIFIED BY STAFF THE PROPOSED SITE WOULD REQUIRE CLEARANCE AND APPROVAL BY THE FEDERAL AVIATION ADMINISTRATION (FAA). KCLA-LP THEREFORE PREPARED AN APPLICATION FOR FAA REVIEW.

IN ANTICIPATION OF APPROVAL, KCLA-LP PLANNED TO MOVE AND RESUME OPERATIONS AT THE NEW LOCATION.

HOWEVER, KCLA-LP WAS RECENTLY PROMPTED BY THE FCC STAFF LETTER POSTED APRIL 27, 2017 VIA APPL.# BPL-20160602ABB OF THE FAA APPLICATION PROCESS IS NOT YET COMPLETE, AND THEREFORE WITHHOLDING FURTHER ACTION ON THE MODIFICATION UNTIL END OF MAY 2017, SO AS TO ALLOW FOLLOW THROUGH WITH THE NEXT FILINGS.

PENDING FULL COMPLETION OF THE FAA APPLICATION PROCESS, KCLA-LP REQUESTS APPROVAL TO CONTINUE OPERATIONS AT THE INTERIM LOCATION SPECIFIED IN THIS STA, UNTIL CLEARED FOR A PERMANENT MOVE AND TRANSMISSION AT ITS NEW PROPOSED FACILITY.

FOR THE INTERIM, THE TEMPORARY FACILITY WILL RESUME OPERATIONS AT A SITE LOCATED APPROXIMATELY 200 METERS OF ITS AUTHORIZED LOCATION. THE INTERIM FACILITY WILL CONTINUE TRANSMITTING AT A REDUCED HAAT AND POWER OF 1.1 WATT ERP UTILIZING 25 W TPO, THEREBY CONTAINED WITHIN ITS CURRENT 60 DBU CONTOUR.

FOR THE REASONS STATED HEREIN, PERMITTEE RESPECTFULLY REQUESTS AN STA PURSUANT TO SECTION 73.1635 OF THE COMMISSIONS RULES TO OPERATE KCLA-LP WITH REDUCED POWER AT AN INTERIM LOCATION SPECIFIED IN THIS STA, WHILE WE CONCURRENTLY PROCEED WITH REMAINDER OF THE FAA APPLICATION FILING PROCESS.

FULFILLMENT OF THE REQUEST WILL SERVE THE PUBLIC INTEREST AS IT ALLOWS THE STATION TO CONTINUE SERVING THE COMMUNITY OF SAN PEDRO AND THE IMMEDIATE SURROUNDING AREA UNTIL THE STATION CAN RESUME OPERATIONS AT FULL POWER AT ITS PERMANENT LOCATION.

Attachment 6

Description
<u>KCLA-Engineering Exhibit and Request for Second Adjacent Waiver</u>