

FEDERAL COMMUNICATIONS COMMISSION
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MEDIA BUREAU
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October 13, 2017

KOWS Community Radio
P.O. Box 1073
Occidental, CA 95465

Re: KOWS-LP (FL), Occidental, CA
KOWS Community Radio
Facility Identification Number: 124420
Special Temporary Authority request
BSTA-20171012ABJ

Dear KOWS-LP:

This is in reference to the request filed yesterday afternoon requesting an emergency Special Temporary Authority for increased power by KOWS-LP. The requested power increase, to 100 watts (0.1 kW) ERP, is sought for a four week period to enable the station to serve a wider area and provide information about evacuations and wildfires in the region. For the reasons set forth below, the request will be denied.

KOWS-LP is presently licensed to operate with 3 watts (0.003 kW ERP) at an antenna height above average terrain of 197.3 meters HAAT. The high HAAT, well in excess of the 30 meter reference HAAT for low power FM (LPFM) stations, requires that the maximum power be reduced to compensate. At 3 watts and 197.3 meters HAAT, KOWS-LP is already operating with facilities equivalent to the reference (maximum) ERP/HAAT of 100 watts / 30 meters HAAT.

This STA request seeks to increase the ERP to 100 watts *without* a concurrent decrease in the HAAT. In other words, the proposed operation would exceed the class maximum.¹ We are not aware of any instance where an FM station, LPFM or otherwise, has been granted an STA to exceed the equivalent limits for the station class, even for a short duration.

Nor is the area presently unserved or underserved. A quick review shows 5 full service licensed FM stations within 10 miles radius of KOWS-LP, with the closest (KWTF) just 3.6 miles distant. There are also two AM stations – KSRO and KRRS – less than 8 miles from the KOWS-LP site, providing both daytime and nighttime coverage to the area. Another LPFM station (KGGV-LP) is just seven miles distant in Guerneville, CA. Somewhat more distant stations also provide coverage to the area. It is clear that there is ample radio service available to anyone seeking it.

¹ With the maximum class facilities already in operation, and accounting for terrain effects, KOWS-LP's 60 dBu service contour covers an area 96 sq. km in extent. A theoretical reference class LPFM station operating at 100 watts and 30 meters HAAT over flat terrain would create a 60 dBu contour covering an area 98 sq. km in extent. At the 100 watt level proposed here, this would swell to approximately 570 sq. km, more than a fivefold increase.

Regarding the two unbuilt first-adjacent channel LPFM construction permits for LPFM stations in Santa Rosa (KRJF-LP and KZCM-LP, just 13.8 miles distant), we are not persuaded that KOWS-LP should be allowed to abrogate the protection from interference currently afforded to these permits, even for a short period. Decades of practice and policy mandate that construction permits receive the same protection from interference as licensed stations. These permittees have a reasonable expectation to similar treatment.

Consequently, your request for Special Temporary Authority IS DENIED.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dale Bickel", written in a cursive style.

Dale Bickel
Senior Engineer
Audio Division
Media Bureau

cc: Michael Couzens (via e-mail only)