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December 18, 2017

ZIP2, LLC
P.O. Box 367
Haddon Heights, NJ 08035

Re: ZIP2, LLC
WKGE(AM), Johnstown, PA
Facility Identification Number: 72964
Special Temporary Authority

Dear Applicant:

This is in reference to the request filed October 30, 2017, on behalf of ZIP2, LLC ("ZIP2"). ZIP2 requests special temporary authority ("STA") to operate station WKGE(AM) non-directionally during daytime and nighttime hours with reduced power facilities.¹ In support of the request, ZIP2 states that WKGE(AM) has been operating at reduced power due to failure of its main transmitter and that extensive damage was found to the phasor, buildings, towers, cabling and antenna system. The station was authorized by STA (BSTA-20170327ABY) to operate non-directionally employing tower #5 (ASRN: 1029609) of the directional array with a reduced power of 1.5 kilowatts. However, that STA expired on September 26, 2017.

WKGE(AM) is now requesting temporary non-directional operation from tower #5 of its array, but with the power increased to 2.5 kilowatts, which is 25% of the licensed power. ZIP2 states that this higher power will help improve the service WKGE(AM) provides to Johnstown until the facility can be reauthorized and reconstructed.

Section 73.1680 of the Commission's rules provide for operation with emergency antenna facilities following damage to authorized antenna systems, provided that an informal request for continued use of an emergency antenna is filed with the Commission within 24 hours. In particular, Section 73.1680(b)(1) states that AM stations may use a horizontal or vertical wire or a non-directional vertical element of a directional antenna as an emergency antenna. AM stations using an emergency non-directional antenna or a horizontal or vertical wire pursuant to this section, in lieu of authorized directional facilities, shall operate with power reduced to 25% or less of the nominal licensed power, or, a higher power, not exceeding licensed power, while insuring that the radiated field strength does not exceed that authorized in any given azimuth for the corresponding hours of directional operation.

¹ WKGE(AM) is licensed for operation on 850 kHz with an unlimited hours power of 10 kilowatts, employing a directional antenna pattern (DA1-U).

Accordingly, the request for STA IS HEREBY GRANTED. Station WKGE(AM) may operate non-directionally from tower #5 of its directional array with a power not to exceed 2.5 kilowatts. It will be necessary to further reduce or cease operation if complaints of interference are received. ZIP2 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. It is noted that in light of the lapse of time between the expiration of the prior STA and the filing of the instant request, the authority granted will not cover the period between September 26, 2017 and the filing of the instant request.

This authority expires on **June 16, 2018**.

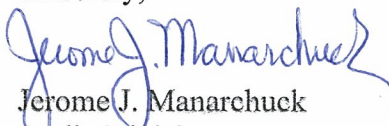
STA Advisory: Section 309(f) of the Communications Act of 1934, as amended, authorizes the Commission to grant STA in cases of "extraordinary circumstances requiring temporary authorizations in the public interest and when delay in the institution of the temporary operations would seriously prejudice 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,


Jerome J. Manarchuck
Audio Division
Media Bureau

cc: Edward Schober (via email only)