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January 30, 2018

Mr. George Baskos
Longmont Community Radio
457 Fourth Avenue
Longmont, CO 80501

Re: KGUD (FM), Longmont, CO
Longmont Community Radio
Facility Identification Number: 62178
License application BLED-20171114AAU
January 17, 2017 "Petition for reconsideration"

Dear Mr. Baskos:

On November 14, 2017, Longmont Community Radio filed a license application for FM station KGUD, Longmont, CO to cover the directional facilities authorized by construction permit BPED-20141216AAD. By letter dated November 30, 2017 ("Letter"), we indicated that the license application's exhibits were insufficient to establish compliance with the several directional antenna conditions on the construction permit. The Letter denied program test authority "until we can verify compliance" with the conditions listed on the construction permit. Longmont Community Radio was given a 45 day period to amend the application and provide acceptable exhibits.

On January 17, 2018, your consulting engineer (J.R. McDonald of Wind River Group, Inc.) filed a pleading styled as a "petition for reconsideration" with new exhibits attached, requesting also that program test authority be authorized for KGUD. However, Section 1.106(a)(1) permits the filing of petition for reconsideration only against *final* actions by the Commission or delegated authority. Denial of program test authority while the staff awaits additional information is not a final action. As a petition for reconsideration, this pleading is not acceptable, and IS DISMISSED.

However, we will consider this filing as an amendment in response to the Letter. But as an amendment, the material supplied falls far short of satisfying the directional antenna conditions specified on the construction permit. We still do not have any information from the manufacturer (Micronetixx) describing the test facilities and equipment, and the procedures employed, to generate the measured directional antenna pattern pattern supplied in the license application and in the amendment. The "Micronetixx Azimuth Pattern FML special cardoid" tabulation contains a statement that the directional pattern was measured with "no other structures present." So the pattern exhibits provided still cannot and do not account for the special standoff mounting arrangement and the effects of the tower structure on the antenna pattern. Worse yet are the statements:

The antenna has been moved to a location away from other antennas at its level or on its outrigger pole.... [T]he antenna has since been moved to a different standoff mount and ... the antenna location has been modified and cable dressing has been modified in the current final installation at the factory's request in order to avoid pattern deformation by the feedline loop and proximity of any adjacent antennas sharing its pole mount. [page 2]

Exactly how the antenna has been recently moved (up or down, around the tower, mounting bracket azimuths changed?) is not specified, which raises a material question as to whether the antenna remains mounted in accordance with the construction permit antenna height values. It seems clear, at least, that the antenna mounting changes mean that the surveyor's measurements from September 18, 2017 are no longer valid and will have to be redone. And this remounting likely will have some undetermined effect on the actual antenna pattern radiated from this antenna as installed on the tower.

In short, when treated as an amendment, this filing fails to provide any new information that would satisfy the directional antenna measurement conditions on the construction permit, or meet the requirements of our November 30, 2017 Letter. We cannot conclude, on the basis of the information provided to date, that this operation will adequately protect other FM licensees from interference or that proper coverage of the community of license will result. Therefore, NO program test authority will be granted to allow operation of KGUD with its construction permit facilities. We will afford Longmont Community Radio one final, 30 day opportunity to provide an amendment that satisfies the conditions specified on the construction permit. Failure to provide this information, or to timely demonstrate material progress in obtaining it, will result in the dismissal of license application BLED-20171114AAU.

Sincerely,



Dale Bickel
Senior Engineer
Audio Division
Media Bureau

cc: George Baskos (via e-mail)
J.R. McDonald (via e-mail)