

2018 JAN 29 PM 2: 05

ORIGINAL

Akin Gump

STRAUSS HAUER & FELD LLP

TOM W. DAVIDSON
202.887.4011 / fax: 202.955.7719
tdavidson@akingump.com

January 26, 2018

Accepted / Filed

JAN 26 2018

Federal Communications Commission
Office of the Secretary

VIA HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 22054

Attn: Edward Lubetzky, Processing Engineer, Audio Division, Media Bureau


**Re: ABC Radio Los Angeles
KRDC(AM), Pasadena, California
Facility ID Number: 250761
File Number: BMMML-20170711ACG**

Dear Mr. Lubetzky:

On behalf of ABC Radio Los Angeles Assets, LLC ("ABC Radio"), licensee of KRDC(AM), Pasadena, California, please find enclosed herewith an update ("Update") to the above-referenced application ("Application"). This Update is being provided in response to a letter, dated January 18, 2018, to ABC Radio from Son Nguyen, Supervisory Engineer, Audio Division, Media Bureau.

Please do not hesitate to contact the undersigned with any questions regarding this matter.

Sincerely,



Tom W. Davidson

cc: Son Nguyen, FCC
Benj. F. Dawson III, P.E. (via e-mail only)

Enclosure

ORIGINAL

HATFIELD & DAWSON

CONSULTING ELECTRICAL ENGINEERS

9500 GREENWOOD AVE. N.

SEATTLE, WASHINGTON 98103

TELEPHONE (206) 783-9151

FACSIMILE (206) 789-9834

E-MAIL hardaw@hardaw.com

MAUREY L. HATFIELD, PE

(1942-2009)

PAUL W. LEONARD, PE

(1925-2011)

THOMAS M. ECKELS, PE
STEPHEN S. LOCKWOOD, PE

DAVID J. PINON, PE

ERIK C. SWANSON, PE

THOMAS S. GORTON, PE
MICHAEL H. MEHIGAN, PE

JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
CONSULTANTS

January 23, 2018

MEMORANDUM

This memorandum is in response to the Commission staff letter of January 18th, regarding the license application, BMML-20170711ACG, for KRDC(AM) Pasadena, CA.

KRDC is currently operating under STA (BESTA-20171219ACX) to allow the installation of the transmitting antenna for translator K256CX. K256CX, in turn, is operating under STA (BESTA-20170905ABV) to allow implementation of changes in its transmitting antenna.

As a consequence of the testing permitted by the K256CX STA, a determination was made to add an additional antenna element to the antenna. An application for modification of the K256CX construction permit is on file, BMPFT-20170525 as amended.

As a result of the modification of the K256CX antenna, a measurement of the KRDC antenna tower on which the antenna is mounted was made, as implied by the requirements of 47CFR73.1.30003(2).[#] This measurement disclosed that the impedance of the tower has been changed more than the allowable tolerance of +/-2 ohms +/-4% resistance and reactance from the original measurements used in the BMML-20170711ACG application as a result of the change in the translator antenna.

Consequently a new set of antenna impedance measurements of the antenna towers for KRDC has been made, and a revised moment method analysis and amended FCC Form-302(AM) license application will be filed imminently. The necessary measurements were made on Friday, January 19th and the license application amendment should be filed within the 30 days advised in the Commission staff's letter.

Benj. F. Dawson III, P.E.

[#] The rule applies to stations licensed per moment method proofs of performance, but obviously applies in this situation as well, where a license application using the moment method rules has been filed and the station is operating under STA with the moment method determined parameters.