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August 8, 2019

Roy E. Henderson N Content Marketing 13999 S. West Bayshore Drive Traverse City, MI 49864

Re: WQAN (FM), Beulah, MI

N Content Marketing

Facility Identification Number: 40639

Special Temporary Authority

BSTA-20190806AAY

Dear Licensee:

This letter is in reference to the two requests for Special Temporary Authority filed July 29, 2019, and a further STA request filed August 6, 2019 with the file number BSTA-20190806AAY. The first, filed under file number BSTA-20190729AAU requested a temporary, reduced coverage installation in the licensed tower structure due to difficulties with the licensed operation. That STA request was August 1, 2019.

The second STA request was denied by letter dated August 1, 2019. It had sought an STA for an additional small facility to be located toward the eastern edge of WQAN's 60 dBu licensed service contour, 40.9 km distant from the licensed transmitter site. The purpose of this second operation was said to allow "better serve other areas of the normal coverage." Our letter noted that the second operation's proposed 60 dBu service contour extended beyond the licensed 60 dBu service contour toward the east-northeast, contrary to our existing policy for processing STA requests. Second, the letter noted simultaneous operation of both STA filings must result in mutual destructive cochannel interference being created within WQAN's licensed service area. The letter concluded public interest is not served by authorizing a temporary facility that further reduces interference-free reception of WQAN's already diminished coverage (under the first STA).

The third STA request, filed August 6, 2019, is essentially a refiling of the second STA request, with the addition of a directional antenna to keep the proposal's 60 dBu within the licensed 60 dBu contour, and to limit the potential for interference to the west. The licensee notes that it has the ability to synchronize the two signals to control interference.

In effect, the licensee is asking for authorization of a new booster facility to relay the over-the-air signals of WQAN. The proper means to do that is through the filing of a construction permit application on FCC Form 349. After grant of a construction permit, the facility can then be implemented. An STA request is not the appropriate means of accomplishing this result.

Consequently, the request for Special Temporary Authority, file number BSTA-20190806AAY, IS DISMISSED.

Sincerely,

Dale Bickel Senior Engineer

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Audio Division Media Bureau

cc: John C. Trent (via e-mail only)