



Federal Communications Commission
Washington, D.C. 20554

March 26, 2021

Cumulus Licensing LLC
3280 Peachtree Road, NW
Suite 2200
Atlanta, GA 30305

Re:Cumulus Licensing LLC
WCOA(AM), Pensacola, FL
Fac. ID No.: 12142
Special Temporary Authority

Dear Applicant:

This is in reference to the request filed March 19, 2021, on behalf of Cumulus Licensing LLC ("CLL"). CLL requests special temporary authority ("STA") to operate station WCOA(AM) during daytime hours with parameters at variance from its licensed non-directional facility. It also requests operation during nighttime hours with parameters at variance from licensed values and/or reduced power while maintaining monitor points within license limits.¹

In support of the request, CLL states that WCOA(AM) has been operating via an STA authorization (BESTA-20200902AAL) due to damage sustained to the directional antenna switching network and related components. The damage required operation with the nighttime pattern for both the daytime and nighttime modes at a reduced power of 2 kilowatts. Repairs have now been completed to the directional switching network and the transmitter is able to achieve full operating power for both the daytime and nighttime modes. However, a change in the overall height of the existing antenna structures by the tower owner has negatively impacted the depths of the nulls for the nighttime operation. Therefore, an STA is requested to allow the daytime operation to resume at licensed power but at the slightly lower tower height (96.3 electrical degrees). In addition, operation during nighttime hours is requested with its licensed power of 5 kilowatts and its 3 tower directional array that have all been reduced in height to 96.3 electrical degrees. Operation is proposed at night with parameters at variance from licensed values and/or reduced power while maintaining monitor points within license limits until its pending application for construction permit (BP-20210319AAJ) is granted.

Accordingly, the request for STA IS HEREBY GRANTED. Station WCOA(AM) may operate during daytime hours with a power of 5 kilowatts and with the slightly shorter tower. In addition, WCOA(AM) may operate during nighttime hours at its licensed power, with slightly shorter towers and with parameters at variance from licensed values and/or reduced power while maintaining monitor points within license limits. It will be necessary to further reduce power or cease operation if complaints of interference are received. CLL must notify the Commission

¹ WCOA(AM) is licensed for operation on 1370 kHz with a daytime and nighttime power of 5 kilowatts, employing a directional antenna pattern at night (DAN-U).

when licensed operation is restored.² CLL 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.

This authority expires on **September 22, 2021**.

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: Mark N. Lipp, Esq. (via email only)

² *See* 47 CFR §§ 73.45(c), 73.51, 73.54, 73.61(b)