



Federal Communications Commission
Washington, D.C. 20554

April 20, 2021

Intelli LLC
1692 Tully Rd.
Suite 9
San Jose, CA 95112

Re: Intelli LLC
KSPA(AM), Ontario, CA
Fac. ID No.: 13899
Special Temporary Authority

Dear Applicant:

This is in reference to the request filed April 15, 2021, on behalf of Intelli LLC ("Intelli"). Intelli requests special temporary authority ("STA") to operate station KSPA(AM) from an alternate site location with a temporary antenna.¹

In support of the request, Intelli states that station KSPA(AM) has lost its licensed transmitting site and a diligent search for a suitable alternative site which could be specified in an application for construction permit was conducted, but was unsuccessful. Therefore, the station is requesting an STA from an alternate site location with limited facilities in order to allow the station to resume broadcast operations. KSPA(AM) went silent on May 6, 2020 and therefore the station's license will automatically expire if broadcast operations do not commence by 12:01 a.m., May 7, 2021.

Specifically, KSPA(AM) proposes to operate from a site located 6.1 kilometers (3.8 miles) from its currently licensed site. Operation is proposed using an Information Station Specialist AN16 (ANXX) antenna system with a daytime and nighttime power of 10 watts. The antenna will be mounted on the roof of an existing building. The roof is 4.5 meters in height and the AN16 antenna is 4 meters in height for an overall elevation of 8.5 meters above ground level. The roof is accessible and the building will be provided with suitable signage on all sides.

STA requests which involve a change in transmitter site must include four critical elements: (1) Loss of the licensed site must be beyond the licensee's control; (2) STA facilities must continue to provide service to the licensed community; (3) STA facilities must maintain, as closely as practicable, the licensed service area² without extending it; (4) STA facilities cannot involve the construction of towers intended for permanent use by the station requesting the STA.

¹ KSPA(AM) is licensed for operation on 1510 kHz with a daytime power of 10 kilowatts and a nighttime power of 1 kilowatt, employing different directional antenna patterns (DA2-U).

² For AM - 0.5 mV/m contour; for FM - 1.0 mV/m contour.

Accordingly, the request for STA is GRANTED. Station KSPA(AM) may operate with the following facilities:

Geographic coordinates	34° 04' 00" N, 117° 40' 10" W (NAD 1927)
Frequency	1510 kHz
Hours of operation	Daytime and Nighttime
Operating power	10 watts
Antenna type	Information Station Specialist AN16 (ANXX) antenna
Electrical height of radiator	7 electrical degrees

It will be necessary to further reduce power or cease operation if complaints of interference are received. KSPA(AM) must notify the Commission when licensed operation is restored. KSPA(AM) 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 **October 17, 2021**.

Notwithstanding the grant of this STA or the expiration date specified herein, the station's license will expire as a matter of law if broadcast operations do not commence by 12:01 a.m., May 7, 2021. *See* Pub. Law No. 104-104, 110 Stat. 56, Section 403(1)(1996) and *Order, Silent Station Authorizations*, FCC 96-218 (released May 17, 1996). *See also Public Notice*, Expedited Processing of Applications Filed by Silent Stations, DA 96-818 (May 22, 1996). The licensee must notify the Audio Division immediately upon resumption of broadcasting.

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,

A handwritten signature in dark ink, reading "Jerome J. Manarchuck". The signature is fluid and cursive, with the first name "Jerome" and last name "Manarchuck" clearly legible.

Jerome J. Manarchuck
Audio Division
Media Bureau

cc: Dan J. Alpert, Esq. (via email only)