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July 27, 2021

Via First Class Mail

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
45 L Street NE
Washington, D.C. 20554

RE: Request for Extension of Experiment Authorization and Waiver
Universal Media Access – KSJO-FM, LLC

Dear Ms. Dortch:

Universal Media Access - KSJO-FM, LLC (“UMA”), the licensee of full power FM radio station KSJO(FM), San Jose, CA (Facility ID 4117) and FM booster KSJO-FM1, Pleasanton, CA (Facility ID 203495), by and through counsel, and pursuant to 47 C.F.R. § 5.203 and 47 C.F.R. § 74.1231(i), hereby requests an extension of the Experimental Authorization originally granted on February 8, 2021 (BESTA-20210203AAI) (the “Authorization”) in order to continue the activity specified in the Authorization. On May 5, 2021, UMA requested an extension of the Authorization (BESTA-20210505AAJ), which was granted on May 7, 2021. Currently, the Authorization is set to expire on August 10, 2021.

As set forth in the Engineering Statement attached hereto as Exhibit A, UMA seeks additional time to continue using the facilities set forth in the Authorization. This extension will enable other members of the broader radio industry ecosystem to observe HD2, HD3, HD4 synchronization between the Main and Booster signals scheduled to be available from Xperi and Gates Air in early September, and also enable observation of various programming-related operation and content enhancements identified in the first phase of this project. The results from the KSJO booster system have been comprehensive and quite positive and are now being fully assessed. UMA has been taking measurements for over two months and, over the past month, independent engineering consultants Roberson and Associates have conducted their own independent testing and assessment. It is our understanding that the Roberson report will be provided to the Commission next month.

The real purpose of the extension of the experimental license is to enable other stakeholders to travel to the San Jose area and observe the operations on the ground, since not all those visits have been able to occur during this limited time. In addition, UMA respectfully requests authority to operate a second antenna to the authorized facilities that would be installed at the same site, but at a higher location on the tower, to facilitate delivery of the signal to area affected by terrain shielding. To further serve those terrain shielded areas, UMA requests authority to operate an additional, mobile booster to be used as needed in the terrain shielded area. Details of the proposed operation are set forth in Exhibit A.

Because 47 C.F.R. § 74.1231(i) prohibits FM boosters from originating programming, UMA also requests an extension of the waiver of this rule for the duration of the extended experimental authorization for purposes of conducting the experiment. In addition, UMA respectfully requests an extension of the waiver of Section 5.203(c)(4) of the Commission's rules to be able to transmit Station KSJO's complete programming, including commercial programming.

Grant of the instant request for extension of the Authorization will serve the public interest. An extension of the Authorization for an additional ninety (90) days will enable various stakeholders to observe and participate in the experimental operations of the Zonercasting™ system. The additional time will permit UMA to explore alternative methods to resolve terrain shielding areas which will lead to more efficient use of the Zonercasting™ system should the FCC authorize wide-scale use in the future.

Should there be any questions concerning this request, please contact me at (202) 663-8195 or miles.mason@pillsburylaw.com, or Bert Goldman at (214) 395-5067 or bert@bgoldman.net.

Sincerely,

/s/ Miles S. Mason

Miles S. Mason

*Counsel for Universal Media Access -
KSJO-FM, LLC*

Cc (via email):

Jim Bradshaw, james.bradshaw@fcc.gov

Rudy Bonacci, rodolpho.bonacci@fcc.gov

**Goldman Engineering Management
Auburn, CA**

DESCRIPTION OF PROPOSED EXPERIMENTAL OPERATION

By this application, Universal Media Access - KSJO-FM, LLC (“UMA”), licensee of KSJO(FM), San Jose, CA and KSJO-FM1, Pleasanton, CA, respectfully requests an amendment to the existing temporary experimental authorization (“Experimental Authorization”) for KSJO (FM).

KSJO, in conjunction with GeoBroadcast Solutions (“Geo”) has obtained all equipment, configured the KSJO transmission chain, modified, and tested the program playout system and traffic entry system, and has built the booster system as anticipated in the approved Experimental Permit. Initial delays in construction of the KSJO booster system as authorized were due solely to wideband data stability problems, not any issues with the booster system or other broadcast technology and have been resolved by changing service providers. Successful initial tune-up of the system has been completed and the system is operating extremely well and meets the initial objectives for the system. UMA and Geo have been testing and taking measurements on the system for over two months and Roberson and Associates have made three trips to the Bay Area over the past month to perform their independent measurement campaign..

Given this success we would now like to extend and enhance the test by adding additional antennas to enhance the coverage, especially for HD in the region covered by the Zone. This will enable UMA and Geo to obtain valuable information regarding the technology’s use with HD radio. UMA therefore requests the authority to add additional equipment to the Experimental Permit to enhance the listener experience in the Zone.

First, UMA would like to modify the currently licensed KSJO-FM1 to add a second antenna to the currently licensed KSJO-FM1 facility. This antenna will be mounted higher on the existing tower than the currently licensed antenna and will, of course, be fully compliant with all technical booster rules.

Second, a new booster node may be added if additional testing is desired and will be placed along a ridge line which shadows the KSJO main and booster signals along Interstate 680 between KSJO-FM1 and what is designated for the experimental tests as KSJO-FM2. This new booster node will be designated KSJO-FM4.

FACILITIES REQUESTED

There are two modifications requested for the Experimental tests underway for KSJO. First, the KSJO-FM1 facility will add a dual CL-FM antenna 85.3m AGL on the same tower as the licensed KSJO-FM1 booster. This will be used to fill in a small area shadowed from the current FM1 antenna. The second requested facility is for a low power booster in a portable tower.

The antenna being used in each case will be a Kathrein Scala Dual CL-FM log-periodic antenna with 45 degree rotation and 0.67 wavelength spaced to provide signal in both the vertical and horizontal planes. The Azimuth Patterns is attached as Exhibit A. A map showing the contour of the proposed KSJO-FM1 antenna addition is shown in Exhibit B. The antenna will operate at 200 watts peak power and the peak power will be oriented at 132 degrees True. As shown in exhibit B, the proposed additional antenna will operate within the 54dBu contour of the Main KSJO station.

A map showing the contour for the potential KSJO-FM4 is shown in Exhibit C. This new booster, if used, is proposed to operate at between 10 watts and 200 watts and will operate within the 54dBu contour of the Main KSJO station.

1. Modified KSJO-FM1 Antenna:

Geographic Coordinates (NAD83):	37°39' 34" N, 121° 55' 59.5" W
Site AMSL Height	453.5m
Channel:	222 (92.3MHz)
Tower ASR	1015996 (Exhibit D)
Tower AGL Height	96.6m
Effective Radiated Power:	Not to exceed 200W (H+V)
Antenna Type, Pattern:	Kathrein BCA Dual CL-FM/RM log-periodic
Antenna Orientation:	132° True
Antenna Height :	
Above ground:	85m
Above mean sea level:	538.5m

2. Possible Sunol Fill-in
- | | |
|---------------------------------|---|
| Geographic Coordinates (NAD83): | 37°37' 31" N, 121° 53' 14" W |
| Site AMSL Height | 124m |
| Channel: | 222 (92.3MHz) |
| Tower ASR | N/A |
| Tower AGL Height | 9m |
| Effective Radiated Power: | Not to exceed 200W (H+V) |
| Antenna Type, Pattern: | Kathrein BCA Dual CL-FM/RM log-periodic |
| Antenna Orientation: | 132° True |
| Antenna Height : | |
| Above ground: | 9m |
| Above mean sea level: | 133m |

ALLOCATION

As shown in Exhibit B, the 54dBu contours of the additional KSJO-FM1 antenna will fall inside the 54dBu contour of KSJO, Channel 222B. With respect to interference to first adjacent KKDV(FM), 221A, Walnut Creek, CA, the f50/10 40dBu interfering contour of the proposed facility will be well contained within the f50/10 54dBu contour of KSJO(FM), as shown in exhibit C. Further, even ignoring the significant short-spacing between KSJO(FM) and KKDV(FM), there will be no first adjacent interference even to the non-interference-limited coverage contour of KKDV(FM).

As shown in Exhibit C, the proposed new FM4, if needed, will fall well inside the 54dBu contour of KSJO. There would be no interference to first adjacent KKDV.

ENVIRONMENTAL CONSIDERATIONS

The requested additional booster antenna for KSJO-FM1 will be mounted at 85 meters AGL on the same registered tower as KSJO-FM1 (ASR 1015996). It is believed that the proposed operation is exempt from environmental processing under 47 C.F.R. § 1.1306.

UMA proposes to operate the additional booster antenna with a peak power of 200 watts. Using the FCC online program "FM Model" for a 1-bay Type 1 ("Ring and Stub"), the predicted worst-case RF power density at 2m AGL with an 85m center of radiation is 1.2µW/cm² or approximately 0.6% of the maximum allowable public exposure (MPE) of 200µW/cm².

The requested additional booster (FM4) will be mounted on a short 30ft portable tower. The AGL height of the antenna will be 9 meters and will operate with an ERP of between 10 watts and 200 watts. Using the FCC online program "FM Model" for a 1-bay Type 1 ("Ring and Stub"), the predicted worst-case RF power density using the maximum 200 watts at 2m AGL with an 9m center of radiation is $164\mu\text{W}/\text{cm}^2$ or approximately 82% of the maximum allowable public exposure (MPE) of $200\mu\text{W}/\text{cm}^2$. The area is fenced and locked on private property.

CERTIFICATION

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direct supervision, and that they are true and correct to the best of his knowledge and belief.



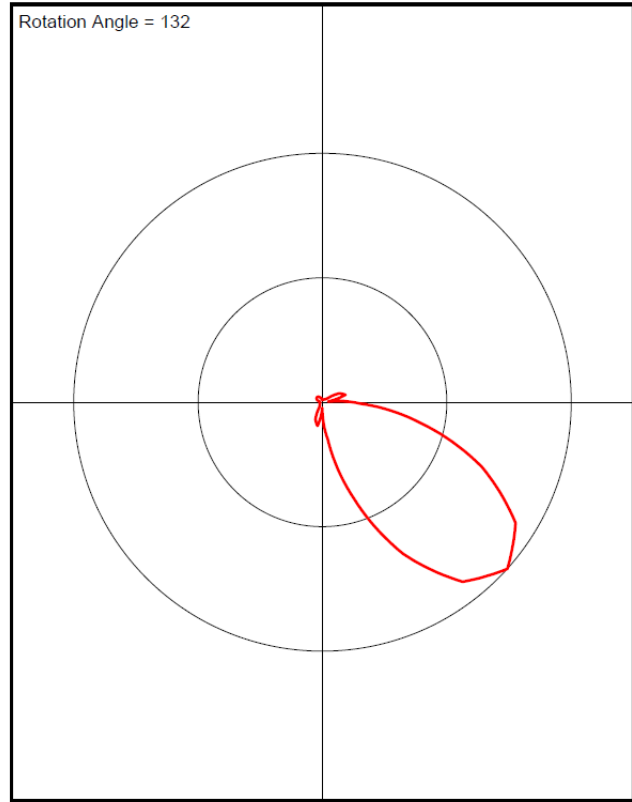
Bertram S. Goldman
Goldman Engineering Management
(214) 395-5067

EXHIBIT A- PROPOSED DIRECTIONAL PATTERN

KSJO FM1 ADDED Antenna Pattern

Post-Rotation Antenna Pattern....

Azimuth (deg)	Relative Field
0.0	0.01
5.0	0.01
10.0	0.01
15.0	0.0106
20.0	0.0116
25.0	0.0126
30.0	0.0136
35.0	0.0143
40.0	0.0148
45.0	0.0177
50.0	0.0222
55.0	0.0393
60.0	0.0648
65.0	0.0816
70.0	0.0926
75.0	0.0748
80.0	0.0378
85.0	0.0608
90.0	0.1238
95.0	0.2258
100.0	0.3538
105.0	0.4902
110.0	0.6322
115.0	0.7568
120.0	0.8698
125.0	0.9405
130.0	0.983
135.0	0.9745
140.0	0.932
145.0	0.8472
150.0	0.7342
155.0	0.6038
160.0	0.4618
165.0	0.3282
170.0	0.2002
175.0	0.1112
180.0	0.0482
185.0	0.0452
190.0	0.0822
195.0	0.0904
200.0	0.0794
205.0	0.0597
210.0	0.0342
215.0	0.0213
220.0	0.0168
225.0	0.0147
230.0	0.0142
235.0	0.0134
240.0	0.0124
245.0	0.0114
250.0	0.0104
255.0	0.01
260.0	0.01
265.0	0.01
270.0	0.01
275.0	0.0103
280.0	0.0108
285.0	0.0146
290.0	0.0206
295.0	0.0245
300.0	0.027
305.0	0.0286
310.0	0.0296
315.0	0.0294



320.0	0.0284
325.0	0.0265
330.0	0.024
335.0	0.0206
340.0	0.0166
345.0	0.0135
350.0	0.011
355.0	0.01

EXHIBIT B- Added Antenna Booster Coverage

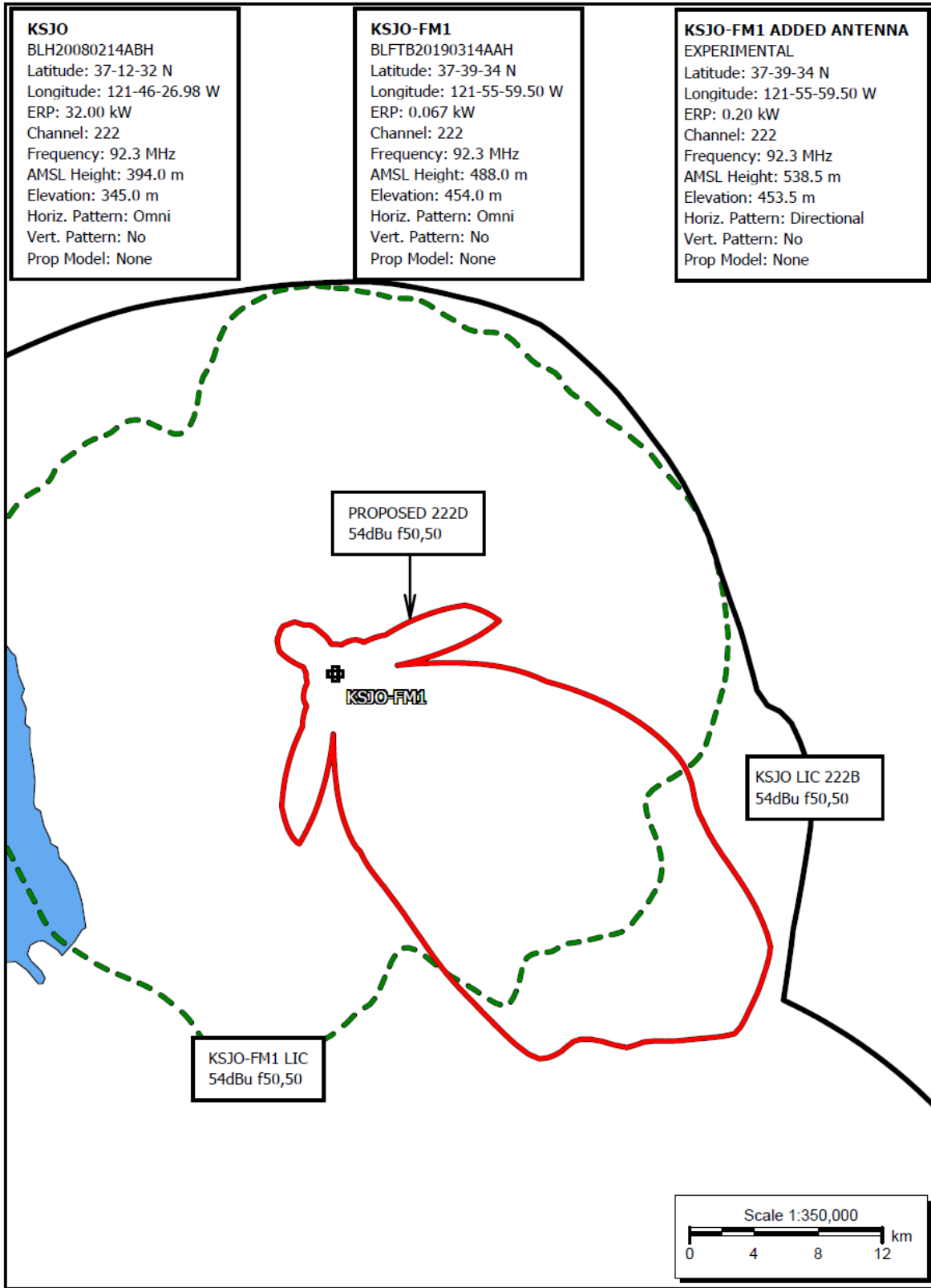


EXHIBIT C- Potential NEW (FM4) Booster Coverage & Interfering contour

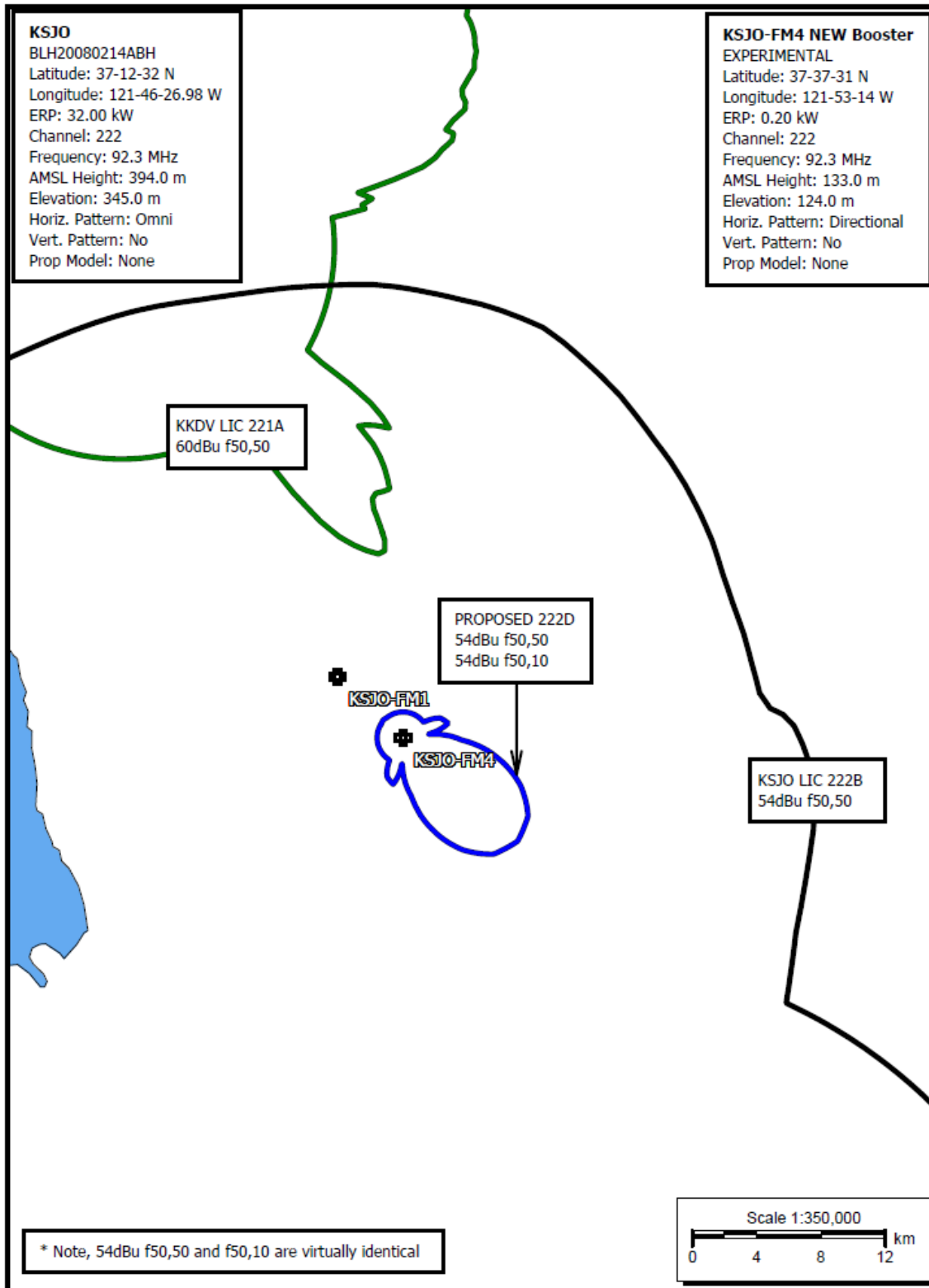


EXHIBIT D- Added Antenna 54dBu INTERFERING CONTOUR to KKDV

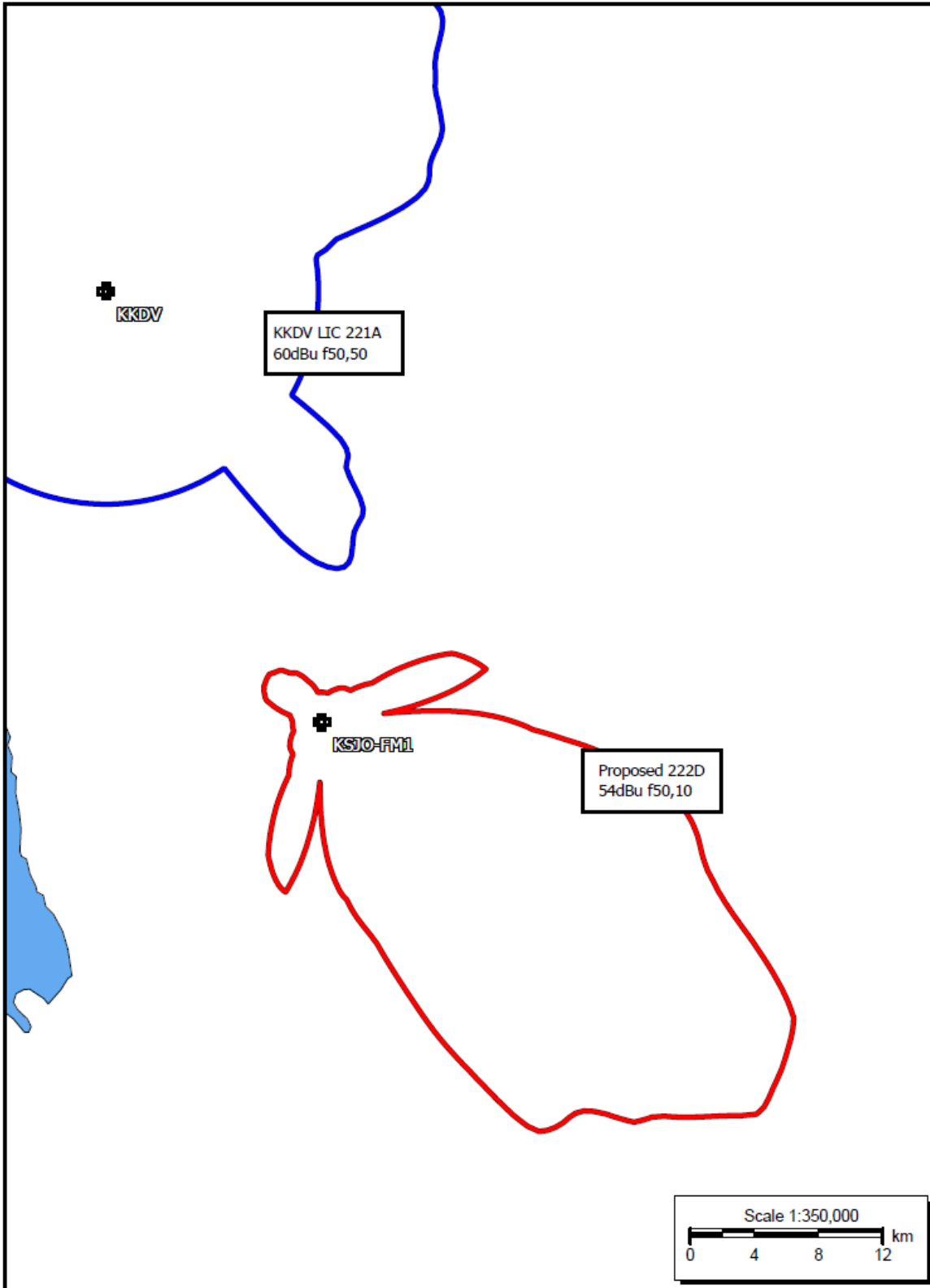


EXHIBIT D- ASR Registration

Registration 1015996

[Map Registration](#)

Registration Detail

Reg Number	1015996	Status	Constructed
File Number	A0816297	Constructed	10/01/1997
EMI	No	Dismantled	
NEPA	No		

Antenna Structure

Structure Type TOWER - Free standing or Guyed Structure used for Commu

Location (in NAD83 Coordinates)

Lat/Long	37-39-34.0 N 121-55-59.5 W	Address	9570 Santos Ranch Road (Pleasanton #1014)
City, State	Pleasanton , CA	County	ALAMEDA
Zip	94588	Position of Tower in Array	
Center of AM Array			

Heights (meters)

Elevation of Site Above Mean Sea Level	453.5	Overall Height Above Ground (AGL)	96.6
Overall Height Above Mean Sea Level	550.1	Overall Height Above Ground w/o Appurtenances	96.6

Painting and Lighting Specifications

FAA Chapters 4, 8, 12
Paint and Light in Accordance with FAA Circular Number 70/7460-1K

FAA Notification

FAA Study	2011-AWP-4805-OE	FAA Issue Date	08/23/2011
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Owner & Contact Information

FRN	0011498342	Owner Entity Type	Limited Liability Company
Assignor FRN	0005885231	Assignor ID	L00008376

Owner

American Towers LLC	P: (678)564-3236
Attention To: Regulatory Compliance FAA FCC	F:
10 Presidential Way	E: faa-fcc@americantower.com
Woburn , MA 01801	

Contact

Attention To: FAA FCC	P: (678)564-3236
10 Presidential Way	F:
Woburn , MA 01801	E: faa-fcc@americantower.com

Last Action Status

Status	Constructed	Received	01/15/2013
Purpose	Change Owner	Entered	01/15/2013
Mode	Interactive		