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November 2, 2009

Gary S. Smithwick, Esq.
Smithwick & Belendiuk, P.C.
5028 Wisconsin Avenue NW, Suite 301
Washington, DC 20016

Re: Saga Broadcasting, LLC
KAFE(FM), Bellingham, Washington
Facility Identification Number: 58886
Special Temporary Authority

Dear Counsel:

This is in reference to the request filed October 30, 2009, on behalf of Saga Broadcasting, LLC ("Saga"). Saga requests special temporary authority ("STA") to operate Station KAFE with temporary facilities.[1] In support of the request, Saga states that it holds Construction Permit BPH-20070703AAY for installation of a directional antenna and a frequency change to Channel 281 (*See* Note 1, below). Saga states that the permit involves a frequency swap with a Canadian station that is scheduled to take place in January, 2010. In order to complete the necessary antenna construction work prior to the onset of adverse winter weather conditions, Saga requests STA to install the authorized directional antenna, but to remain on its currently licensed channel.[2]

Our review indicates that good cause has been shown for grant of the requested STA, and that no interference to other stations is likely to result from the proposed temporary operation.

Accordingly, the request for STA IS HEREBY GRANTED. Station KAFE may operate with the following facilities:

Geographic coordinates:	48° 40′ 50″ N, 122° 50′ 26″ W (NAD 1927)
Channel	282 (104.3 MHz)
Effective radiated power:	60 kilowatts (Max-DA, H&V)
Antenna height:	
above ground:	64 meters
above mean sea level:	739 meters
Above average terrain:	701 meters

[1] KAFE is licensed for operation on Channel 282C (104.3 MHz) with effective radiated power of 60 kilowatts (H&V) and antenna height above average terrain ("HAAT") of 704 meters. Construction Permit BPH-20070703AAY authorizes a change in operating frequency to Channel 281C (104.1 MHz), operation with a directional antenna and a 3-meter reduction in HAAT, and correction of the transmitter site coordinates.

[2] A separate, concurently-filed STA is granted for operation with reduced power and antenna height, to facilitate the antenna construction work.

Saga must notify the Commission when licensed operation is restored. Saga 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 **May 2, 2010**.

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,

Charles N. Miller, Engineer
Audio Division
Media Bureau

cc: Saga Broadcasting, LLC