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September 24, 2019

Mr. Vincent Klepac
Vinco Media, LLC
210 Kiley Drive, Suite 2
Salisbury, MD 21801

Re: WKHI (FM), Newark, MD
Vinco Media, LLC
Facility Identification Number: 198742
Special Temporary Authority
BSTA-20190918ABA

Dear Licensee:

This is in reference to your September 18, 2019 request for Special Temporary Authority (STA). You advise that WKHI (FM) is losing its transmitter site and must move to a new location. The STA seeks authority to move the current directional antenna to a tower located 6.0 km (3.7 miles) northwest of the licensed site.

WKHI is licensed as a Section 73.215 "contour protection" station, and it must limit the station's signal in the direction of first-adjacent channel Class B station WDSD, Dover, Delaware. The existing directional antenna achieves this result. The licensed facility for WKHI is spaced 97.1 km from WDSD, in compliance with the 96 km minimum separation requirement in Section 73.215(e) of the Commission's Rules.

The proposed 6.0 km site change diminishes the spacing to WDSD to 93.4 km. Consequently, the new location will not be acceptable for permanent licensing as the station's main facility, since the 96 km minimum spacing required by Section 73.215(e) is not met. This site can only be used for temporary operation by WKHI.

Using the station's licensed directional antenna pattern from this location, at an ERP of 4.7 kW, would cause the 60 dBu contour from the STA operation to exceed the licensed 60 dBu contour toward the northward.[1] This fails our STA processing criterion that requires the STA service contour remain within that of the licensed operation.[2] As filed, this STA request is not grantable and is subject to dismissal.

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[1] This analysis includes the effects of the reduced antenna height.

[2] The directional antenna pattern relative field values provided by Vinco mirror those of the licensed directional antenna pattern, but it is not clear (without actual pattern measurements) that these values will remain valid after installation on a new tower. But certainly these values will be incorrect if the antenna orientation is changed to 180˚ (Vinco suggests the new orientation in an e-mail). Without new pattern measurements, we will not consider reorienting this directional antenna.

However, we conclude that an STA can be granted with certain limitations:

(1). The directional antenna must be oriented in the direction of 159˚ true. (See the directional antenna exhibits included with license application BLH-20170216ABQ). All elements of the antenna must be installed as specified in that license application.

(2) Vinco Media has not provided directional antenna pattern measurements for the installation of this directional antenna on the new tower, to establish the precise directional pattern. Therefore, this STA will not negate or supersede construction permit conditions requiring such measurements on future authorizations for main or auxiliary facilities.

(3). **Effective radiated power is limited to a maximum of 3.0 kW ERP.** This ERP effectively limits the STA 60 dBu service contour to the location of the licensed 60 dBu service contour toward the north and northwest. WKHI may not be operated with an ERP in excess of 3.0 kW under this STA.

(4) Vinco Media is responsible for addressing any interference complaints that may arise as the result of this STA operation.

This Special Temporary Authority expires March 23, 2020.

Sincerely,

Dale Bickel
Senior Engineer
Audio Division
Media Bureau

cc: Mr. Vincent Klepac (via e-mail)