

DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP

2101 L Street NW • Washington, DC 20037-1526

Tel (202) 785-9700 • Fax (202) 887-0689

Writer's Direct Dial: (202) 955-6631

E-Mail Address: KerstingA@dsmo.com

September 22, 2004

Mr. Steve Herbert
Santa Monica College
KCRW 89.9
1900 Pico Boulevard
Santa Monica, CA 90405

Re: K215BA License Application

Dear Steve:

Enclosed is a copy of the license application that was recently filed for FM translator station K215BA on Monday, September 20, 2004. The application was accepted for filing on September 21st, and will go on public notice tomorrow, September 23rd. As I previously indicated, we need to provide the Commission's staff with the date upon which the station was constructed and commenced on-air operation. Please give me that date as soon as you can. Thanks.

If you have any questions concerning this matter, please contact me.

Sincerely,



Andrew Kersting

Enclosure

cc: Lew Paper (w/ encl.)

1177 Avenue of the Americas • New York, NY 10036-2714

Tel (212) 835-1400 • Fax (212) 997-9880

www.DicksteinShapiro.com

DSMDB.1825778.1

Section II - Legal

1.	Certification. Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No
2.	Conditions. Licensee/Permittee certifies that all terms, conditions, and obligations set forth in the underlying construction permit have been fully met.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 2]
3.	Changed Circumstances. Licensee/Permittee certifies that, apart from changes already reported, no cause or circumstance has arisen since the grant of the underlying construction permit which would cause any statement or representation contained in the construction permit application to be incorrect now.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 3]
4.	Programming. The applicant is the licensee of the primary station or the applicant certifies that written authority has been obtained from the licensee of the primary station whose programming is to be retransmitted.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 4]
5.	Station ready for operation. The applicant certifies that the station is now in satisfactory operating condition and ready for regular operation.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 5]
6.	Station identification. The applicant certifies that it will comply with applicable station identification rules. See 47 C.F.R. Sections 73.1201 and 74.1283.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 6]
7.	Character Issues. Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with: a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or b. any pending broadcast application in which character issues have been raised.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 7]
8.	Adverse Findings. Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 8]
9.	Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing THOMAS J. DONNER	Typed or Printed Title of Person Signing EXECUTIVE VICE PRESIDENT/BUSINESS & ADMINISTRATION
Signature	Date 09/18/2004

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name JOHN J. DAVIS		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date 09/18/2004	
Mailing Address PO BOX 128			
City SIERRA MADRE		State or Country (if foreign address) CA	Zip Code 91025 - 0128
Telephone Number (include area code) 6263556909		E-Mail Address (if available) JOHNJDAVIS@ADELPHIA.NET	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Section III - Engineering			
TECHNICAL SPECIFICATIONS			
Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.			
TECH BOX			
1.	Channel: 215		
2.	Effective Radiated Power:	0.01 kW(H)	0.01 kW(V)
3.	Transmitter Power Output:	0.009 kW	
NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.			
CERTIFICATION			
All applicants must complete this section.			
4.	Constructed Facility. The facility was constructed as authorized in the the underlying construction permit.	<input checked="" type="radio"/> Yes <input type="radio"/> No	See Explanation in [Exhibit 9]
5.	Special Operating Conditions. The facility was constructed in compliance with all special operating conditions, terms, and obligations described in the construction permit.	<input checked="" type="radio"/> Yes <input type="radio"/> No	See Explanation in [Exhibit 10]
An Exhibit may be required. Review the underlying construction permit.			[Exhibit 11]
6.	Transmitter Power Output. The operating transmitter power output produces the authorized effective radiated power	<input checked="" type="radio"/> Yes <input type="radio"/> No	

		See Explanation in [Exhibit 12]
7.	<p>Directional Antenna. The facility does not use a directional antenna or the antenna is mounted in accordance with the specific instructions provided by the antenna manufacturer and is oriented in the proper direction.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 13]</p>

PREPARER'S CERTIFICATION ON SECTION 3 MUST BE COMPLETED AND SIGNED.

Exhibits

Exhibit 11

Description: ANTENNA SYSTEM

DESCRIPTION OF THE TWO TRANSMITTER RF POWER OUTPUTS FEEDING THE CABAZON/BEAUMONT ANTENNA ARRAY AND THE YUCCA VALLEY ANTENNA.

Attachment 11

Description
Exhibit 11 - K215BA Antenna System

EXHIBIT 11

In order to achieve the desired antenna radiation pattern toward Cabazon/Beaumont and Yucca Valley, two different types of antennas were used:

1. Cabazon/Beaumont: Scala, Model CA2-FM (Horizontal) and CA2-FM (Vertical) FM dipole reflector antennas, with an azimuth heading of 195°. Composite Antenna Gain: 1.26 (1.0 dBd)
2. Yucca Valley: Scala, Model HDCA-5CP/RM (Circular) FM Yagi Antenna, with an azimuth heading of 80°. Antenna Gain: 2.818 (4.5 dBd)

Each antenna is fed by its own ½" transmission line and separate RF output from the translator. The table below shows the K215BA operating parameters for each antenna which makes up the translator operating system:

<u>DESCRIPTION</u>	<u>CABAZON/BEAUMONT</u>	<u>YUCCA VALLEY</u>
ERP:	10.0 Watts	7.0 Watts
Composite Antenna Gain:	1.26	2.818
Antenna Input Power:	7.94 Watts	2.48 Watts
Transmission Line Efficiency: Length:	88.51% (23.2 meters)	88.10% (24.1 meters)
Transmitter Power Output:	8.97 Watts	2.82 Watts

The translator output feeding the Cabazon/Beaumont antenna was adjusted to nine watts and the output to the Yucca Valley antenna was adjusted to 2.8 watts. Under these conditions, the resulting antenna radiation pattern matches the pattern authorized by the underlying construction permit. The Transmitter Power Output shown in Section III, Tech Box 3, of 9.0 watts (rounded to the nearest watt) is the larger of the two transmitter outputs from the FM translator.