

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

November 5, 2004

RECEIVED

NOV - 5 2004

Federal Communications Commission
Office of Secretary**By Hand**

Marlene H. Dortch
 Secretary
 Federal Communications Commission
 236 Massachusetts Avenue, N.E.
 Suite 110
 Washington, D.C. 20002

Re: Request for Special Temporary Authorization
KCRW(FM), Santa Monica, California (Facility ID 59086)

Dear Ms. Dortch:

Santa Monica Community College District ("SMCCD"), acting pursuant to Section 73.1635 of the Commission's rules, 47 C.F.R. §73.1635, hereby requests a Special Temporary Authorization ("STA") for a period of 180 days to permit radio station KCRW(FM), Santa Monica, California, to implement in-band on-channel ("IBOC") transmissions for analog and digital signals through the use of separate antennas pursuant to *Public Notice*, 19 FCC Rcd 4722 (MB 2004) ("Use of Separate Antennas to Initiate Digital FM Transmissions Approved") ("*Public Notice*").

In accordance with the *Public Notice*, SMCCD's proposed digital transmission will use KCRW's licensed auxiliary facility (File No. BLED-19940824KA). The auxiliary antenna is within three (3) seconds of latitude and longitude of KCRW's main antenna, and the height above average terrain (HAAT) of the auxiliary antenna is eighty-eight percent (88%) of the HAAT of the station's main antenna. The geographic coordinates, elevation data, and license file number for the auxiliary antenna to be employed for digital transmissions are as follows: North Latitude: 34° 07' 08"; West Longitude: 118° 23' 30"; 298 meters HAAT; and File No. BLED-19940824KA.

SMCCD plans for KCRW to commence digital transmissions on November 17, 2004. In the event the Commission should receive interference complaints concerning KCRW's interim operation, the Commission should contact Steve Herbert at (310) 314-4652.

The transmitter power output for KCRW's analog and digital transmitters are 10 kW and 102 watts, respectively. The licensee certifies that the effective radiated power will remain as authorized: 6.8 kW for the licensed auxiliary antenna and 6.9 kW for the licensed main facility. The auxiliary antenna will operate with a digital-only ERP of 69 watts when the KCRW main antenna is operational. There will be no digital transmissions when the auxiliary antenna is

1177 Avenue of the Americas • New York, NY 10036-2714
 Tel (212) 835-1400 • Fax (212) 997-9880
www.DicksteinShapiro.com

used for analog transmissions (*i.e.*, emergency service). SMCCD certifies that the IBOC facilities conform to the iBiquity hybrid specifications.

SMCCD further certifies that the interim operation would not cause human exposure to levels of radiofrequency radiation in excess of Section 1.1310 of the Commission's rules and therefore is categorically excluded from environmental processing pursuant to Section 1.1306(b). *See* 47 C.F.R. §§1.1310, 1.1306(b).

KCRW's auxiliary facility operates with an ERI model LPX-2E-HW, half wave-spaced antenna. SMCCD certifies that the physical vertical separation of 40 meters (131.2 feet) between KCRW's main and auxiliary antennas provides more than adequate separation so that no intermodulation interference is anticipated. However, in the event such interference is found to exist, SMCCD will immediately suspend KCRW's digital transmissions and install filters and/or circulator equipment as necessary to prevent further interference.

In light of the foregoing, SMCCD hereby requests an STA for a period of 180 days from November 17, 2004, to permit KCRW to commence IBOC transmissions.

Attached to this request is an Anti-Drug Abuse Act Certification.

Should any questions arise concerning this request, please communicate directly with the undersigned.

Very truly yours,

DICKSTEIN SHAPIRO MORIN
& OSHINSKY LLP

Attorneys for
Santa Monica Community College District

By: 
Andrew S. Kersting

Enclosure

cc: Charles N. Miller (FCC) (w/ encl.) *by hand & email*

Anti-Drug Abuse Act Certification

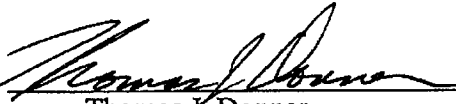
Santa Monica Community College District has authorized Dickstein Shapiro Morin & Oshinsky LLP to request a Special Temporary Authorization from the Federal Communications Commission concerning radio station KCRW(FM), Santa Monica, California (Facility ID No. 59086).

No party to this request is subject to a denial of federal benefits, including benefits available from the FCC, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Executed this 4th day of November, 2004.

Santa Monica Community College District

By: 
Thomas J. Donner
Executive Vice President/
Business & Administration