

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, DC

In the matter of:)	
)	
Reexamination of the Comparative Standards)	MB Docket No. 19-3
and Procedures for Licensing Noncommercial)	
Educational Broadcast Stations and Low Power)	
FM Stations)	

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REPLY COMMENTS

I. INTRODUCTION

1. REC Networks (“REC”) is a leading advocate for a citizen’s access to spectrum with a heavy focus on the Low Power FM (LPFM) broadcast stations as well as the full-service noncommercial educational (NCE) broadcast stations. In this pleading, REC replies to comments made in the above captioned proceeding.

II. *NUNC PRO TUNC* IS FOR FIXING ERRORS, NOT CHANGING THE PAST

2. The LPFM Coalition, et al has stated that the LPFM stations that are dismissed for a member of the board having a past violation of Section 301 of the Communications Act should be able to have that board member removed from the board and allow the application to be amended *nunc pro tunc* in

order to reinstate the application.¹ In the alternate, the recommend a maximum of a 20 percent change in the board in the event of a situation like this.² Jeff Sibert (“Sibert”) finds it striking that LPFM stations have such a restriction on applicants with a “pirate past” that other broadcast services do not have.³

3. A vocal part of the efforts to protest the provisions of the Telecommunications Act of 1996 were those who were involved in the pirate radio movement. This was at a time when there was one activist who was urging people to start over 10,000 pirate stations around the country in order to protest the changes in the national ownership regulations as a result of the Act.⁴ At the time, many pirate stations were operating and were operating with unstable equipment that resulted in interference to public safety and aeronautical communications thus risking safety of life.⁵ There were major concerns about the potential of those with a “pirate past” obtaining LPFM licenses and using unstable uncertified equipment. When the original *Report and Order* for LPFM was adopted, the Commission had provisions that would allow someone with a pirate past who had ceased operation as of February 26, 1999 or within 24 hours of notification by the Commission to still be eligible for a license in the LPFM service.⁶ Congress would eventually pass the Radio Broadcast Protection Act which included a provision prohibit any applicant from obtaining an LPFM license if the application had engaged in any manner in the unlicensed operation of any station in violation of Section 301 of the Communications Act.⁷ In *Ruggiero v. FCC*, the divided court ruled the pirate past law was

¹ - See comments of Prometheus Radio Project, Common Frequency and LPFM Coalition (collectively “LPFM/C”) at 3.

² - See Id.

³ - Sibert comments at 2-3.

⁴ - Opel, Andy, *Micro Radio and the FCC: Media Activism and the Struggle Over Broadcast Policy*, Greenwood Publishing Group, p. 52 (“John [also known as “Phlegm”] reframed [Stephen] Dunifer’s own slogan ‘let 10,000 transmitters bloom’ to reflect the absolutist position Dunifer called for in his attack on [Jesse] Walker.”)

⁵ - The risk to the aviation services would eventually be brought up in the PIRATE Act legislation. See H. Rept. No. 115-843 at 5 citing testimony of David L. Donovan, President, New York State Broadcasters Association, before the Subcommittee on Communications and Technology, Committee on Energy and Commerce, U.S. House of Representatives, March 22, 2018 at 12-13. (“The danger to the public is significant, as interference from pirate stations could cause errors in navigational guidance, interference to pilot-to-ground communications, as well as other aeronautical systems.”)

⁶ - See *Creation of a Low Power Radio Service*, Report and Order, 15 FCC Rcd 2205 (2000) (“LPFM Order”) at 54.

⁷ - Pub. L. No. 106-553 (“RBPA”) at §632(a)(1)(B). See also 47 U.S.C. §301.

unconstitutional, however that decision would eventually get vacated.⁸ The pirate provision would also be included in the Local Community Radio Act, where it remains in force today.⁹

4. In the *nunc pro tunc* public notice, the *nunc pro tunc* process was intended for applicants to submit “relatively minor curative” amendments within 30 days of a dismissal action.¹⁰ The Commission makes this procedure possible for those who wish to participate in the comparative process.¹¹ Normally, this process is used when correcting a technical aspect of the application or change some other aspect of the application.

5. The issue though when dealing with parties to the application and their eligibility to be a Commission licensee, the information supplied by the applicant should be the information that is in effect as of the date of original filing. Making a *nunc pro tunc* amendment should be used to correct an error on the original application, not change the past. If the organization had, at the time of filing, persons “A”, “B”, “C” and “D” on the original application and at the time, the applicant certified that all four board members did not have any adverse actions, character issues, alien ownership, qualified under the U.S. Anti-Drug Act and they also certified that no board member had violated Section 301 of the Act in the past, then that’s the certification that was made. By making a certification that was contrary to the truth, that is a false certification.

6. It is the applicant’s responsibility to properly vet their board members prior to the filing of the application. The Form 318 instructions and the form itself are very clear on the matter. Therefore, the applicant is responsible for telling the truth from day one. If the board of an organization did have a party that had a pirate past or otherwise would exclude the applicant from being a Commission license, this issue should have been addressed *before* the filing of the original application. Just like how a short-spacing on the original application can’t be resolved *nunc pro tunc*, REC feels the same way about suddenly changing board members *nunc pro tunc*.

⁸ - See *Regguiero v. FCC*, 278 F. 3d 1323 (D.C. Cir. 2002), *vacated* 317 F. 3d 239 (D.C. Cir. 2003).

⁹ - Pub L. 111-371, 124 Stat. 4072(2011) (“LCRA”) at §2.

¹⁰ - See *Commission States Future Policy on Incomplete and Patently Defective AM and FM Construction Permit Applications*, 56 R.R. 2d. 776, 49 F.R. 47331 (1984) at 3.

¹¹ - See *Id.*

III. TIME SHARE AGREEMENTS MUST BE MINIMAL, VIABLE AND IN SOME CASES, “OUT OF THE BOX”

A. LPFM-C Comments

7. REC agrees with LPFM-C that point aggregation promotes aggression instead of cooperation but at the same time does not agree with methods proposed to keep point aggregation to a minimum as proposed by REC.¹² We do, however, feel that local community presence does play an important role in the selection process as the Commission needs a proper metric to break ties. If the Commission was to not use local community presence dates, then a new metric would be necessary such as population within the 1 mV/m coverage contour (which would always favor urban LPFM stations over competing rural applicants, a policy REC would deeply oppose). REC continues to support the “mini-window” concept as originally proposed by the Commission.¹³ The “mini-window” process will provide an opportunity for new organizations to join into the existing channel in the event that an existing proponent backs out. There would be no incentive to the Commission, nor to any potential applicants if the mini-window consisted of a block of only 10 or 12 hours per week of time. Because of the expense of a certified transmitter, certified EAS and additional site expenses in order to accommodate second-adjacent channel waivers, it would be worth no one’s time to open such a small window of opportunity.

8. Not all stations are going to build. We saw this happen in the aftermath of the 2013 window. Sometimes, boards change minds, lose funding or lose sites. When these things happen, a construction permit grant will fail, resulting in a lapse. If that happens, another group willing to step up should be given an opportunity, even if that opportunity is between filing windows. REC still supports our viable time share agreement concept as proposed in the *ex parte* presentation.¹⁴

B. A debriefing of MX Group #27 from the REC perspective

9. In the aftermath of the 2013 LPFM filing window, we saw 32 applicants in the greater Los Angeles area apply for Channel 268L1 (101.5). The Commission would eventually reduce the list as a result of fatal errors on various applications and in a few cases, applicants voluntarily requesting their applications dismissed. We were left with with a massively large MX group where some stations were spaced as much as 42 miles apart.

¹² - LPFM-C comments at 3-4.

¹³ - NPRM at 61.

¹⁴ - See REC Networks *ex parte* presentation, dated February 1, 2019.

10. At the time, REC was working very closely with the application for Downtown Los Angeles Business Improvement District (“KRKD”), which was proposing to operate from the old KRKD radio tower on the roof of the Spring Arcade Building in Downtown Los Angeles’ Historic Core.

11. REC had started an outreach to most of the 5-point applicants within the group. During the filing process, we note that one group of applications (Future Roots (FR), Machine Project (MP), Materials & Applications (M&A), Craft & Folk Art Museum (CAFAM), Echo Park Film Center (EPFC) and Eagle Rock Culutral Association (ERCA)) contained near-boilerplate statements around engineering and qualifications. All but one application (FR) were at commercial leased tower sites. REC had identified this group (which we dubbed at the time as the “Westside 6” due to their location in Los Angeles) as an attempt to stack 30 points in an effort to win the group.¹⁵ During a personal visit to Los Angeles in 2014, it was determined that the Eagle Rock group never even authorized their application to be filed. As a result of this suspected point stacking, REC did not approach the “Westside 6” applicants. REC did attempt to reach out to other 5-point applicants in MX Group #27 including Long Beach Community Television and Media (LBTV), Iglesias de Restauracion Filial South Bay (Filial), Edgewood High School (EHS), National Hispanic Media Coalition (NHMC), Prism Church, Boyle Heights Arts Conservatory (Boyle), City of Industry (Industry), Glendale Humane Society (GHS), Church in Anaheim (Anaheim), Ballet Folklórico Ollin (Ballet), Emperor’s Circle of Shen Yun (ShenYun) Miliken Community Schools (Miliken) and Catalyst Long Beach (Catalyst).¹⁶ As a result of the outreach, we heard back originally from LBTV, Edgewood, Boyle, Industry, GHS, Anaheim, Shen Yun and Miliken.

¹⁵ - We note that a majority of the hours in the time-share agreement that would eventually follow, FR took a large majority of the hours in their time share proposal thus further suggesting that the other groups were originally added merely as a method to manipulate the results and stack points in favor of Future Roots, who would have been the dominant operator. As a result of some out of the box handling by staff in MX Group #27, FR, MP and EPFC would move to Channel 256L1 on a time-share basis with MX Group 40 grantee Reach For The Top, Inc (RFTT). FR, not having permission to use the site at RFTT, as well as EPFC, would co-locate at the site for MP (which was previously involved in operation from an unauthorized location in a nature preserve). CAFAM would move west to the Pacific Palisades area and remain on Channel 268L1. M&A would move to Burbank and operate on Channel 244L1. Based on numerous reports as well as physical monitoring personally conducted by REC’s Michelle Bradley between June 4 and June 15, 2019, MP had been operating “dead carriers” for a period of approximately one year but is now running content. Despite having filed licenses to cover, MP & EPFC have not operated during their time slots. Numerous attempts by REC to monitor CAFAM has demonstrated that this station is also silent. Reports regarding the operation of M&A suggest that the programming consist of “an open microphone within what sounds like a casino” with hourly IDs and no substantive programming.

¹⁶ - See Appendix A for a listing of the MX Group #27 stations mentioned in this pleading.

12. During the process, REC worked closely with Miliken to try to find them a better site (and one outside of the 24 km spacing with other applicants). Our dialogue with Boyle was early in the negotiation and we were able to determine their schedule needs. Shen Yun had also introduced a specific schedule need that did not demand a lot of weekly hours. Edgewood had also introduced a schedule that would have been compatible with a time share with Shen Yun.

13. Because of the unique terrain of Los Angeles, REC had evaluated some “out of the box” solutions which would have been able to include 13 of the time share proponents utilizing directional antennas and terrain. The result was that through engineering and without regard to the §73.807 spacing rules between LPFM stations, we could have had a situation in Los Angeles where as many as six LPFM stations could be on the air on 101.5 at the same time. This of course would have required short-spacing waivers and the use of directional antennas to achieve.¹⁷

C. The Commission should allow for creative solutions and for secondary grants in time-share groups.

14. Under the plan REC had developed to assure that as many applicants had access to 101.5, it would have required the Commission to allow some creative waivers by permitting two stations, less than 24 km the ability to operate simultaneously, mutually agreeing to each others interference and using directional antennas and terrain to shield each station from the other. It would have also required the Commission to allow a situation where some members would be able to operate unlimited instead of having each group ask for a portion of 168 hours, even if they are otherwise full spaced from its aggregated partners.

15. In addition, the Commission should permit secondary time share grants in situations when members of the group make a final move to a different location to free themselves from the group. This is what happened in MX Group #40.¹⁸ In this group, Strategic International Ministries (SIM), Reach for The Top (Reach) and Peace & Dignity Project (PDP) were the 5-point applicants. SIM and Reach were more than 24 km apart but were “glued” together by a 4-point applicant. SIM and Reach entered into a time share agreement, thus aggregating 10 points. Due to Commission rules, each group had to file for 12 hours each despite there being 24 km of separation.¹⁹ Upon grant, SIM would eventually file for unlimited hours. The third five-point applicant, PDP, attempted to make a final effort *nunc pro tunc* to change their location

¹⁷ - See Appendix C.

¹⁸ - See Appendix B for applicants in MX Group #40.

¹⁹ - See 47 C.F.R. §73.872(c)(1)(ii) (“The proposal must not include simultaneous operation of the time-share proponents.”)

to be at least 24 km from SIM. The Commission denied that amendment despite the fact that it would have created 3 24/7 services on 99.1 in the Los Angeles area.²⁰

16. MX Group #40 could have been better resolved, if the Commission first “removed” the 4-point applicants from the MX group in order to determine if any 5 point applications would have become singletons if the 4 point applications were not considered and then can make those singleton grants and remove those facilities from the MX group. If this had happened in MX Group #40, then Reach would have been granted unlimited operations and removed from the MX group. The group would be left with SIM and PDP, which could reach a voluntary time share and aggregate 10 points or they would fall into involuntary timesharing with PDP getting the first choice. PDP could have also moved more than 23.5 km away to break out of the group.²¹ The 4-point applicants would have been given some time to be able to move to other channels or otherwise out of the way.

17. While there will probably never be another MX Group #27 again, there is still the possibility of two 5-point applications over a long distance from each other being in a MX group tied together by a 4-point applicant. Overall, REC supports keeping the local presence date as the tie-breaking metric and we also support changes that permit tentative selectees and non-tentative selectees to be treated independently and allow MX groups to be “split” as non-tentative selectees are factored out.

IV. THE SITE ASSURANCE POLICY MUST BE IMPROVED TO ADDRESS GAMESMANSHIP

18. As mentioned before, if there was a written verification of the availability of a site *at the time of application*, then we could have prevented issues that had escalated during the post-window processing including the Westside 6 group and many of the applications that had involvement by Antonio Cesar Guel. On an issue raised by Dan Alpert (Alpert), REC agrees that applicants should not be required to show any certification of assurance for a “main studio” site.²² This is different than the verification of headquarters, which resulted in the dismissal of some applications when the Commission determined that the organization never operated from a particular location that was claimed as a headquarters for localism purposes. In the same manner, it is REC’s position that addresses for board members must be their primary

²⁰ - See *Peace and Dignity Project, et. al.*, Letter, BNPL-20131112BY (Dec. 17, 2014).

²¹ - They attempted to do that, however their attempt was thwarted by the remaining presence of a conflicting 4-point applicant (Iglesia).

²² - Alpert at 1-2.

residential address where the board member resides more than 50 percent of the time.²³ Broadcast stations, especially noncommercial educational stations are public trustees that have been entrusted to various members of the general public. The cornerstone of the LPFM service is its localism. It is not just encouraged, but it is required by rule.²⁴ Board members must be accountable to the communities they serve and therefore it should be transparent that these board members actually reside in those communities. This cannot be demonstrated if the address disclosed is a post office box, business address or vacation home.

V. CONCLUSION

19. REC continues to support most of the proposals made in the original NPRM with the exception of pre-negotiated aggregation agreements as we would favor a form of viable time-sharing agreements. We also continue to support the various items that were originally proposed by REC including extending construction periods, eliminating the 3-year hold on assignments and to permit assignments of construction permits following an 18-month holding period in an effort to “save the station”.²⁵ REC is looking forward to the next reserved-band NCE filing window, hopefully as early as 2020 and then an LPFM filing window following that.

Respectfully submitted,

/S/

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June 18, 2019

²³ - Alpert at 2.

²⁴ - See 47 C.F.R. §73.853(b).

²⁵ - It is REC’s position that comments made by LPFM Advocacy Group (LPFM-AG) in respect to removing the provision that consideration in LPFM station assignments be limited to depreciated fair-market value (thus being able to sell LPFM stations for a profit) is outside of the scope of this proceeding. See LPFM-AG comments at 1.

APPENDIX A**FACILITIES IN 2013 MX GROUP #27**
THAT WERE MENTIONED IN THESE REPLY COMMENTS

Facility ID #	Applicant name	Abbreviation used in comments	Current status based on monitoring and incoming reports
196192	Echo Park Film Center	EPFC	On Channel 256, co-located with MP, has not been reported to ever be on the air despite license grant.
196172	Future Roots, Inc.	FR	On Channel 256, co-located with MP, has not been reported to ever be on the air despite license grant.
197117	Machine Project	MP	On Channel 256. Was previously reported as operating a dead carrier between 9PM and 1AM (their time share slot) but now is reported to be carrying some programming.
196198	Materials & Applications	M&A	On Channel 244. Reported to be on the air with what appears to be an “open mic in a casino”. Station is running IDs but does not appear to be running any kind of substantive programming.
196909	Historic Downtown Los Angeles Business Improvement District	KRKD	Construction permit lapsed.
195312	Long Beach Community Television and Media Corporation	LBTv	On Channel 256. On the air unlimited and monitored by REC as running substantive programming.
193888	Iglesias de Restauracion Filial South Bay	Filial	On Channel 248. Operation status unknown. (Unable to monitor due to strong interference from co-channel super-powered station KLYY)
197426*	Edgewood High School	EHS	Construction permit lapsed.
192043*	National Hispanic Media Coalition	NHMC	On Channel 268. On the air during time share period and reported running substantive programming.
196700*	Los Angeles Academy of Arts and Enterprise	LAAAE	On Channel 268. Past reports have indicated the station was running “dead air” and no substantive programming.
197182*	Prism Church Los Angeles	Prism	Construction permit lapsed.
194772*	Boyle Heights Arts Conservatory	Boyle	On Channel 268. Reported to be operating substantive programming in its time share slot.
196570	The Emperors Circle of Shen Yun	ShenYun	On Channel 268. Reported to be operating substantive programming (mostly from New Tang Dynasty TV network) in its time share slot.
197409	City of Industry	Industry	Voluntary dismissal.

(continued...)

Facility ID #	Applicant name	Abbreviation used in comments	Current status based on monitoring and incoming reports
196468	Craft and Folk Art Museum	CAFAM	On Channel 268, authorized for unlimited operation. Numerous attempts by REC to monitor this station indicate that the station is not on the air despite being licensed.
195397	The Church in Anaheim	Anaheim	On Channel 268. Reported to be providing substantive programming.
196858*	Ballet Folklorico Ollin	BFO	On Channel 268. Reported to be providing programming at times. While this station is a part of the original time share group, it is more than 24 km from all other time share proponents and should be permitted to operate unlimited.
193208	Milken Community Schools	Milken	Withdrew from the group. Unable to find a viable site. Original application was on their campus (therefore had site assurance).
197111	The Eagle Rock Cultural Association	ERCA	In 2014, ERCA indicated that they never authorized the LPFM application to be filed (they had a boilerplate application similar to FR, MP, CAFAM, EPFC and M&A). The group was dismissed as a non-tentative selectee.
195900*	Catalyst Long Beach, Inc.	Catalyst	Construction permit lapsed.
192831	G Final Cut, Inc.	GFC	On Channel 268. Operating status unknown.
197096	Oriental Culture Center	OCC	Moved to Ontario. On Channel 268. Reported to be operating some programming from New Tang Dynasty television network.

* - Indicates stations that are subject to the local program origination and main studio pledges as outlined in 47 CFR §73.872(b).

APPENDIX B**FACILITIES IN 2013 MX GROUP #40
THAT WERE MENTIONED IN THESE REPLY COMMENTS**

Facility ID #	Applicant name	Abbreviation used in comments	Current status based on monitoring and incoming reports
196314	Peace and Dignity Project	P&D	Dismissed as non-tentative selectee. Denied on reconsideration after attempt to reinstate <i>nunc pro tunc</i> due to conflict with Iglesia.
195799*	Reach for The Top, Inc.	RFTT	On Channel 256. Operating time-share and monitored with substantive programming. Subsequently entered into a time-share agreement with MP, FR and EPFC, originally from MX Group #27.
197314*	Strategic International Ministries.	SIM	On Channel 256. Operating unlimited and monitored with substantive programming. SIM also operates a booster on Chatsworth Peak.
196949	The Los Angeles Social Justice Project	LASJP	Authorized for Channel 300. Currently building for a June 23, 2019 deadline.
197351	Iglesia Fuente de Vida, Inc.	Iglesia	Dismissed as non-tentative selectee. Denied on reconsideration due to the prohibition on secondary grants.

* - Indicates stations that are subject to the local program origination and main studio pledges as outlined in 47 CFR §73.872(b).

APPENDIX C**REC NETWORKS ORIGINAL PLAN TO RESOLVE
MX GROUP #27 TO CREATE A 60 POINT MX GROUP****ANTENNAS****MEGAGROUP APPLICANTS**

KRKD	Full power - Directional antenna: Scala CL-FM at azimuth 300.
Glendale	Full power - Directional antenna: Scala CL-FM at azimuth 325.
Edgewood	No specific antenna specified.
LBTv	Power reduction to 80 watts as per the amended application.
Anaheim	Full power – Shively 6812B – 4-bay half-wave spacing.

NHMC APPLICANTS

NHMC	Full power – Directional antenna: Scala CL-FM at azimuth 90.
Prism	Co-locate with NHMC.
Shen Yun	Full power – BKG77 circularly polarized at azimuth 60.
Catalyst	Co-locate with LBTv.
LAAAE	Co-locate with KRKD.
Ballet	Half power as per original application.
Boyle Heights	Half power as per original application.

SHORT SPACE WAIVERS NEEDED

- Ballet Folklorico Ollin and Glendale
- Boyle Heights and Glendale
- Glendale and NHMC/Prism
- Glendale and KRKD/LAAAE
- Glendale and Shen Yun
- Glendale and Ballet
- KRKD/LAAAE and NHMC/Prism
- KRKD/LAAAE and Shen Yun
- KRKD/LAAAE and Glendale
- NHMC/Prism and Glendale
- NHMC/Prism and KRKD
- Shen Yun and KRKD/LAAAE
- Shen Yun and Glendale

We will have to amend Edgewood to slightly move the tower to the west as the current distance to Boyle Heights is 23.49 km.

SCHEDULES

Under the combined operating schedule, there are several subgroups:

Subgroup A(1)	Includes KRKD, LAAAE (co-located with KRKD) and Boyle Heights. Only one of these stations can be on the air at one time.
Subgroup A(2)	Includes NHMC, Prism Church (co-located with NHMC), Edgewood HS, Shen Yun and Boyle Heights. Only one of these stations can be on the air at one time. Because of Boyle Heights location, they are in both subgroups A(1) and A(2). When Boyle is on the air, KRKD/LAAAE, NHMC/Prism and Shen Yun can't broadcast.
Subgroup B	LBTv and Catalyst. Only one of these stations can be on the air at one time.
Subgroup C	Glendale – becomes unlimited operation.
Subgroup D	Ballet Folklorico Ollin – becomes unlimited operation.
Subgroup E	Anaheim – becomes unlimited operation.

Based on interactions with applicants, we have determined:

- Edgewood High School wants to operate during school hours only and are willing to give up school holidays.
- Boyle Heights wishes to operate in the evenings “when people are listening”.
- Shen Yun wants Monday through Friday from 4pm-7pm and two hours on Saturday.
- KRKD will have a direct connection with the City of Los Angeles Emergency Operations Center and wishes the transmitter on the air as much as possible even if another licensee is using the transmitter. (LAAAE can co-locate with KRKD to assure that the EOC has maximum access)

The following joint schedule takes these needs into consideration:

MONDAY THROUGH FRIDAY

0000-0500	KRKD	Prism Church (via NHMC)
0500-0900	KRKD	NHMC
0900-1600	KRKD	Edgewood HS*
1600-1800	KRKD	Shen Yun
1800-1900	LAAAE (via KRKD)	Shen Yun
1900-2100	LAAAE (via KRKD)	NHMC
2100-2400	Boyle Heights	Boyle Heights

*-On school holidays, Edgewood's time can go to NHMC or Prism.

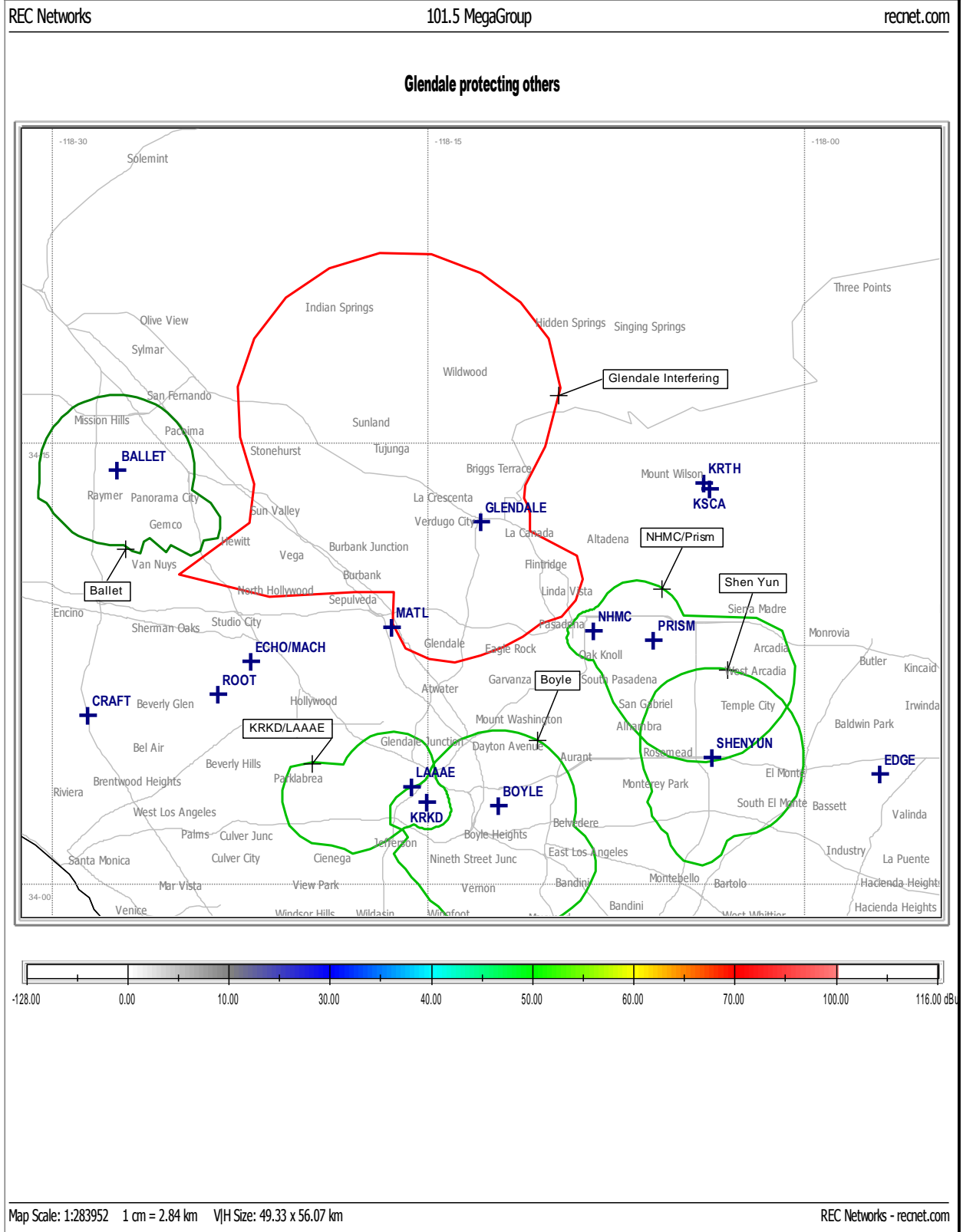
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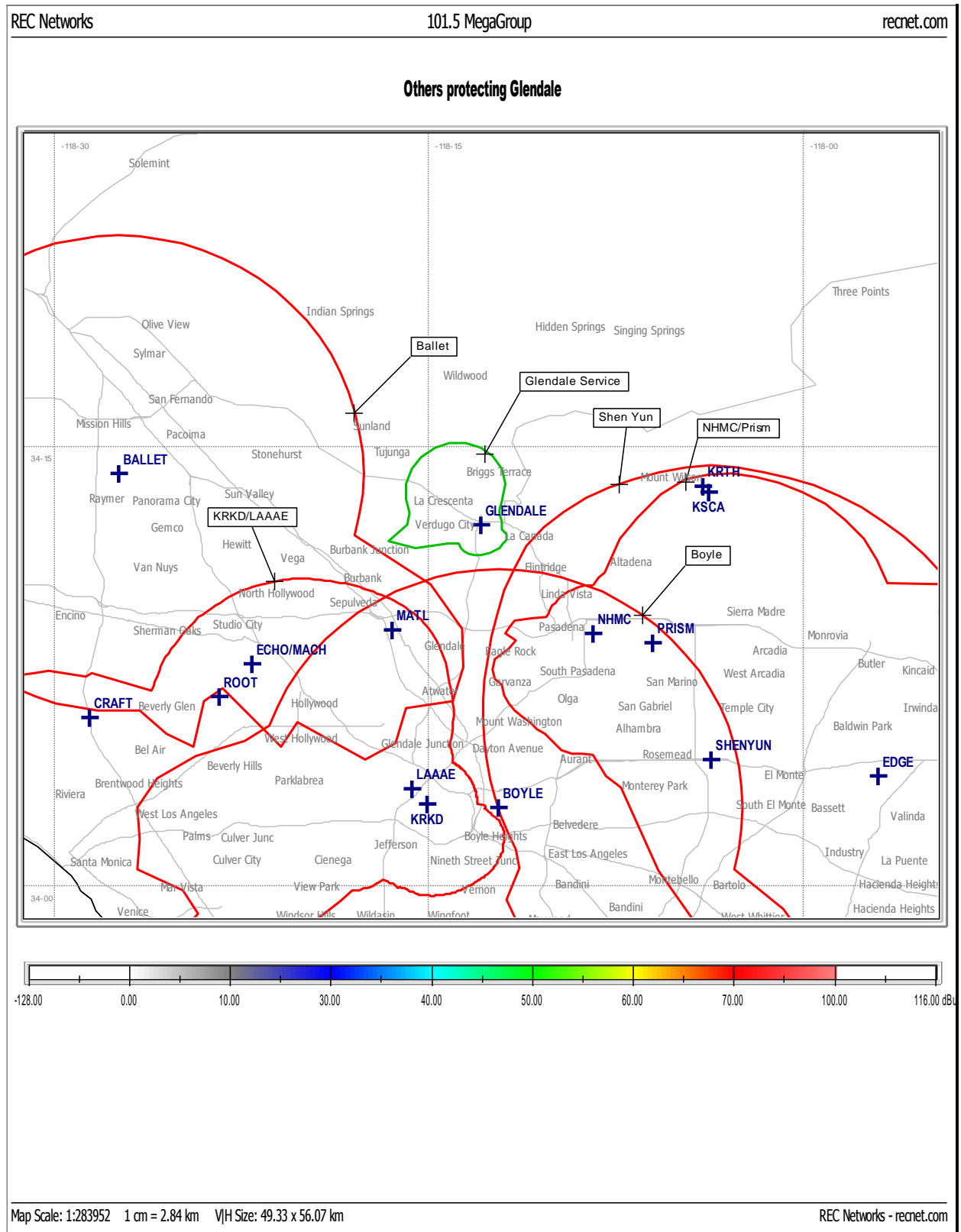
0000-1000	KRKD	NHMC or Prism
1000-1300	KRKD or LAAAE	NHMC or Prism
1300-1500	KRKD or LAAAE	Shen Yun
1500-1800	KRKD or LAAAE	NHMC or Prism
1800-2400	Boyle Heights	Boyle Heights

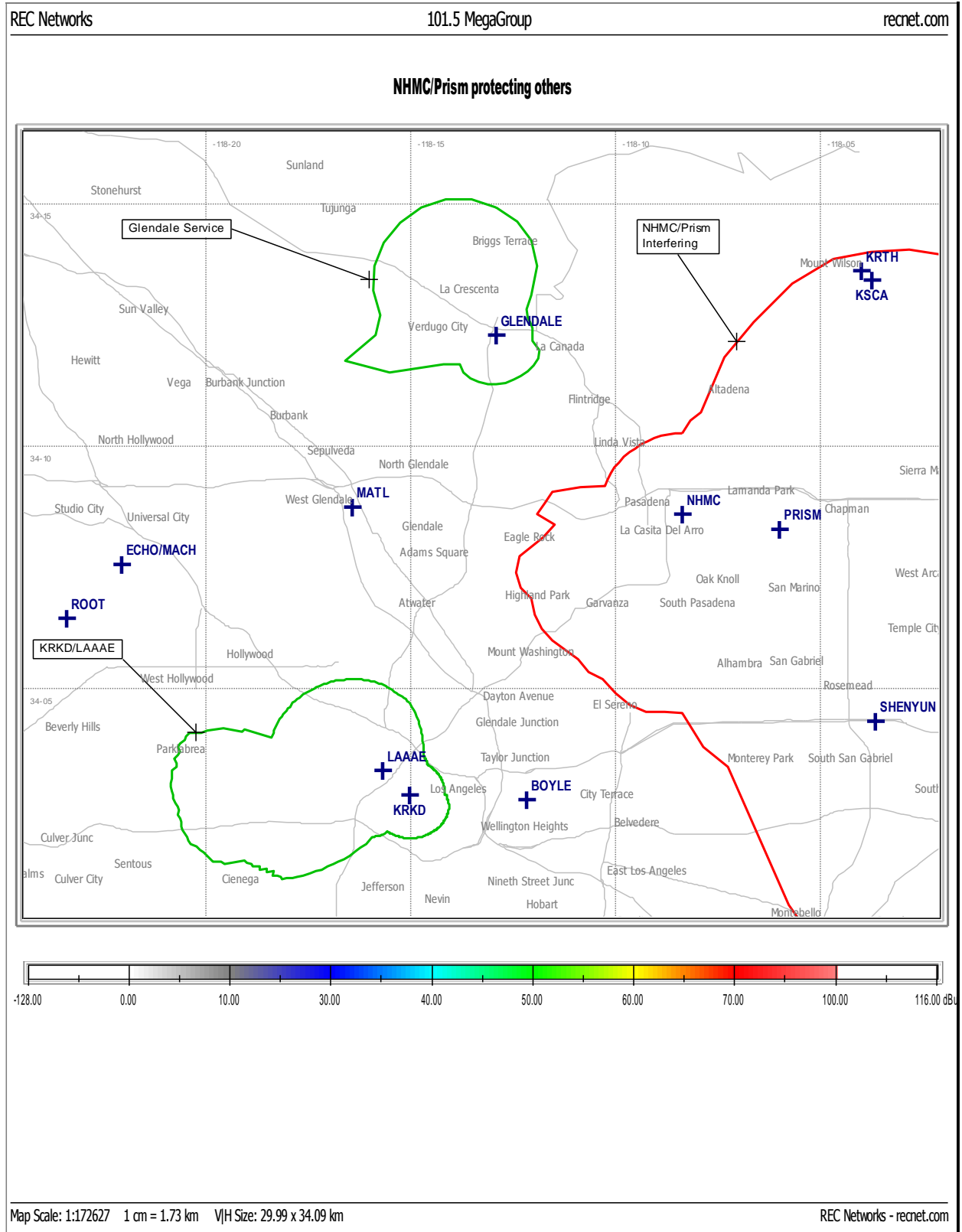
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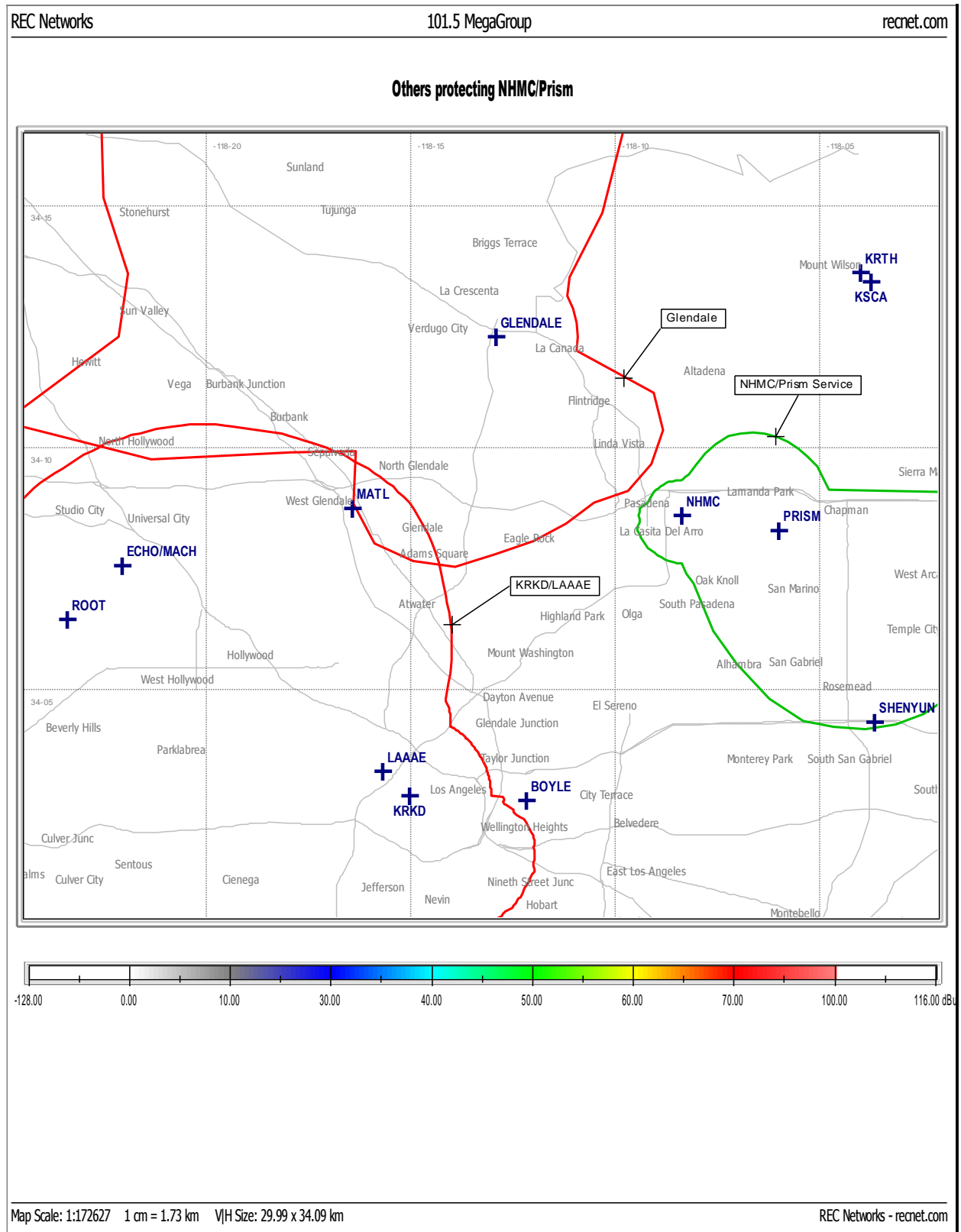
0000-1800	KRKD or LAAAE	NHMC or Prism
1800-2400	Boyle Heights	Boyle Heights

Under this schedule, the KRKD transmitter will be on the air 21 hours a day during the week and 18 hours on weekends. With the station's close ties to the City of Los Angeles, it is in the public interest to keep this transmitter on the air as much as possible as it can be used for emergency purposes during a Downtown incident. For this reason, KRKD invites LAAAE to operate from the KRKD transmitter. Boyle Heights will operate in the evenings as per their request. In Subgroup A(2), Edgewood and Shen Yun's specific schedule needs are met with NHMC or Prism Church taking the remaining time. Like with the Subgroup A(1) stations, all Subgroup A(2) stations must give way for Boyle Heights' evening operation.

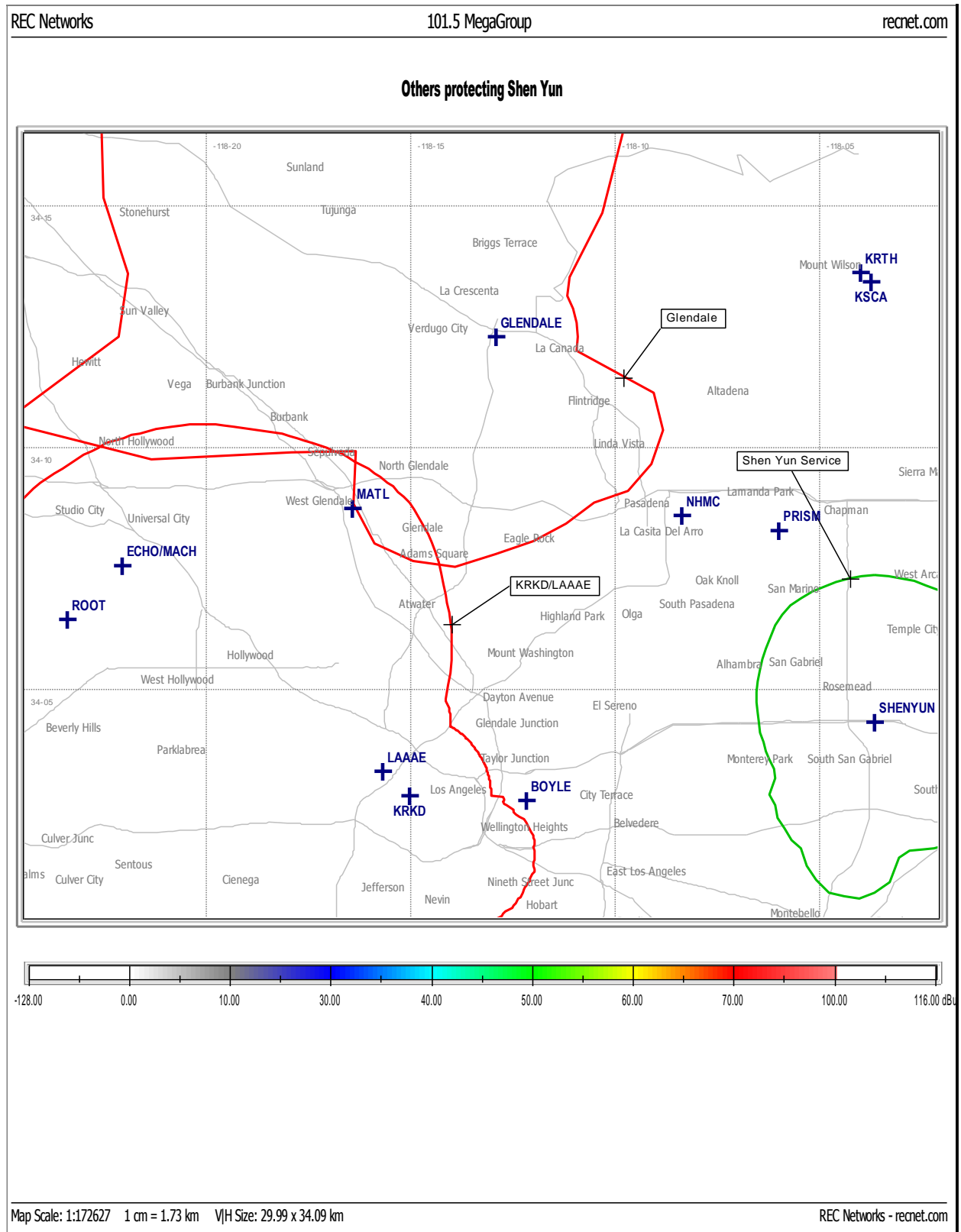


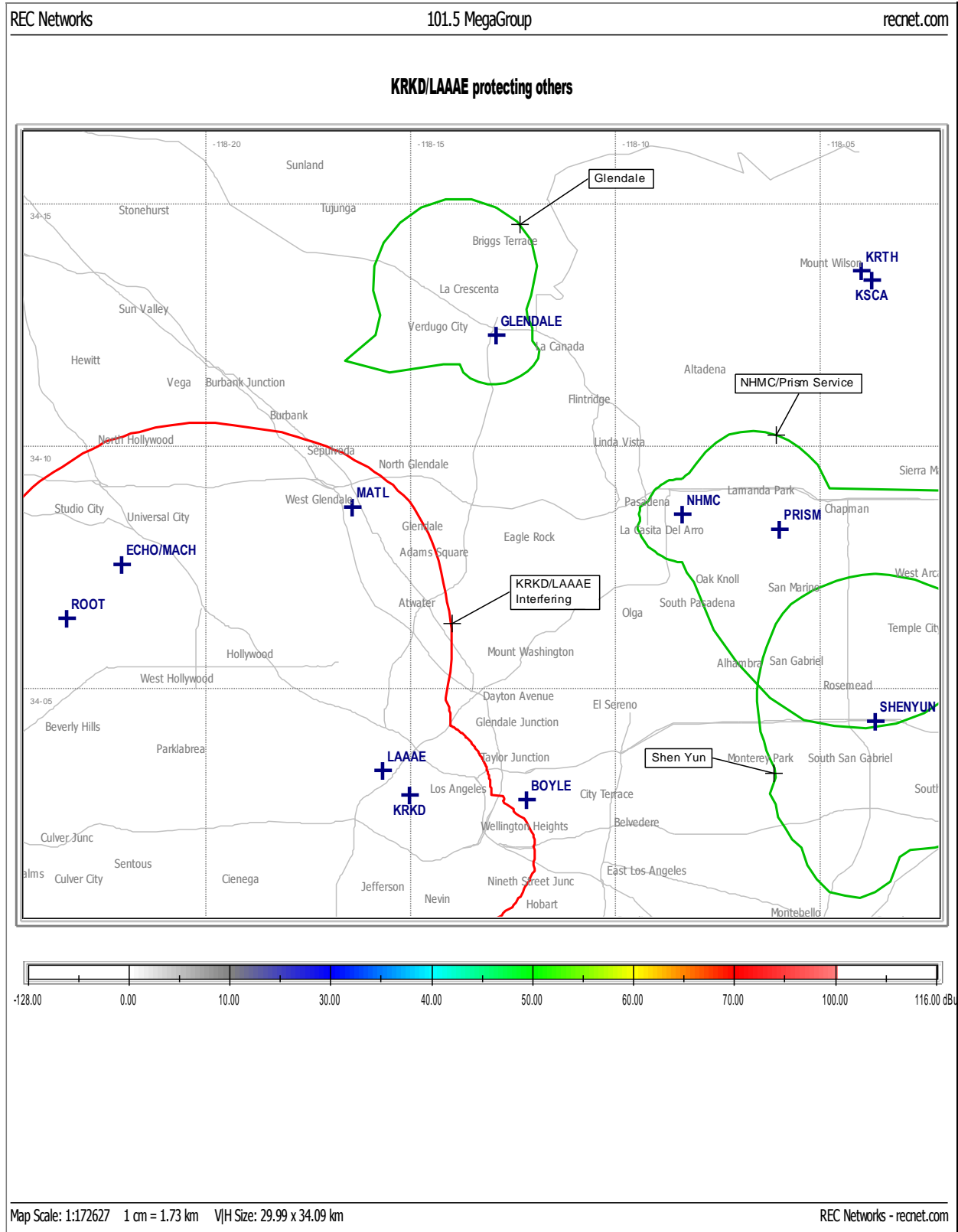


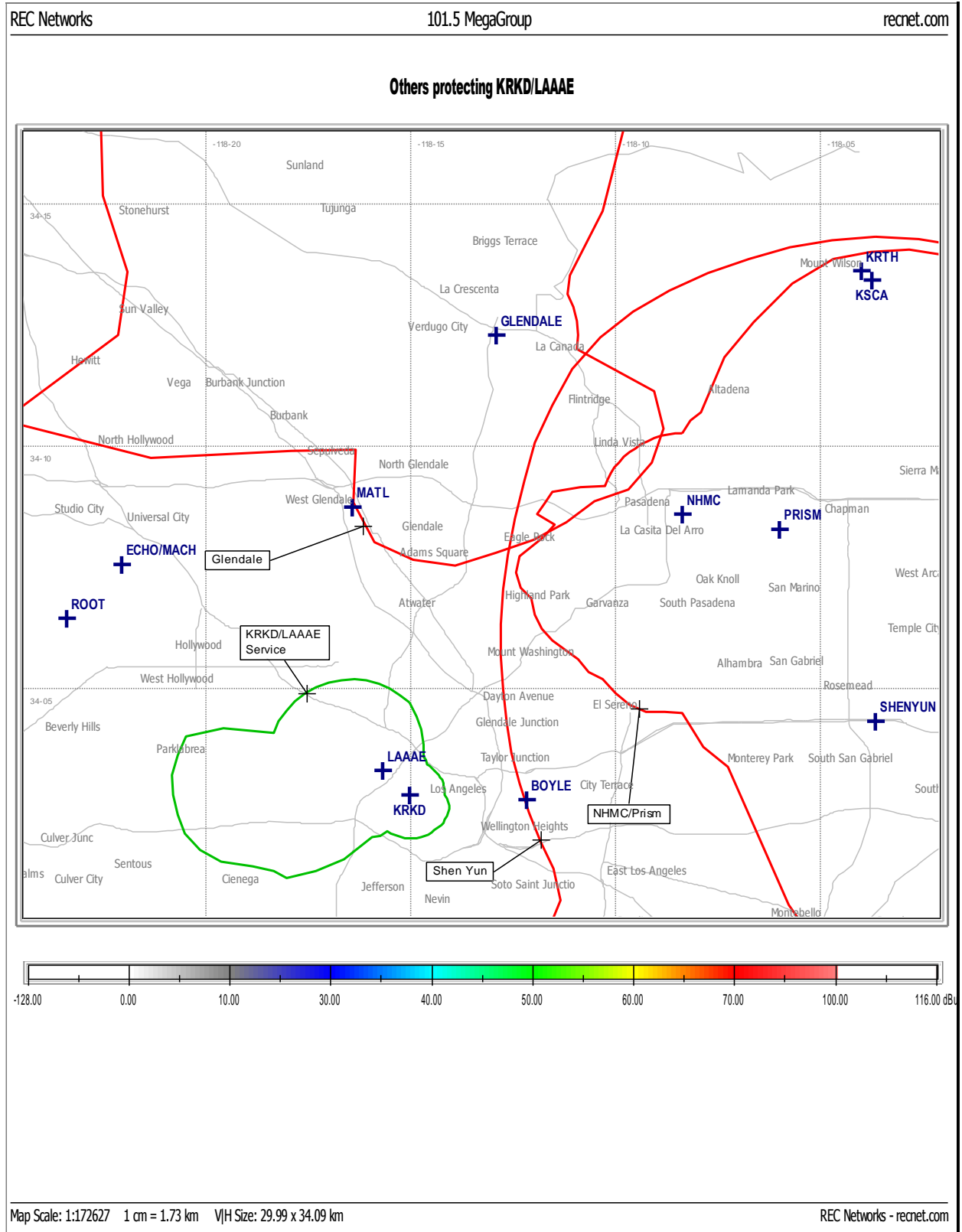


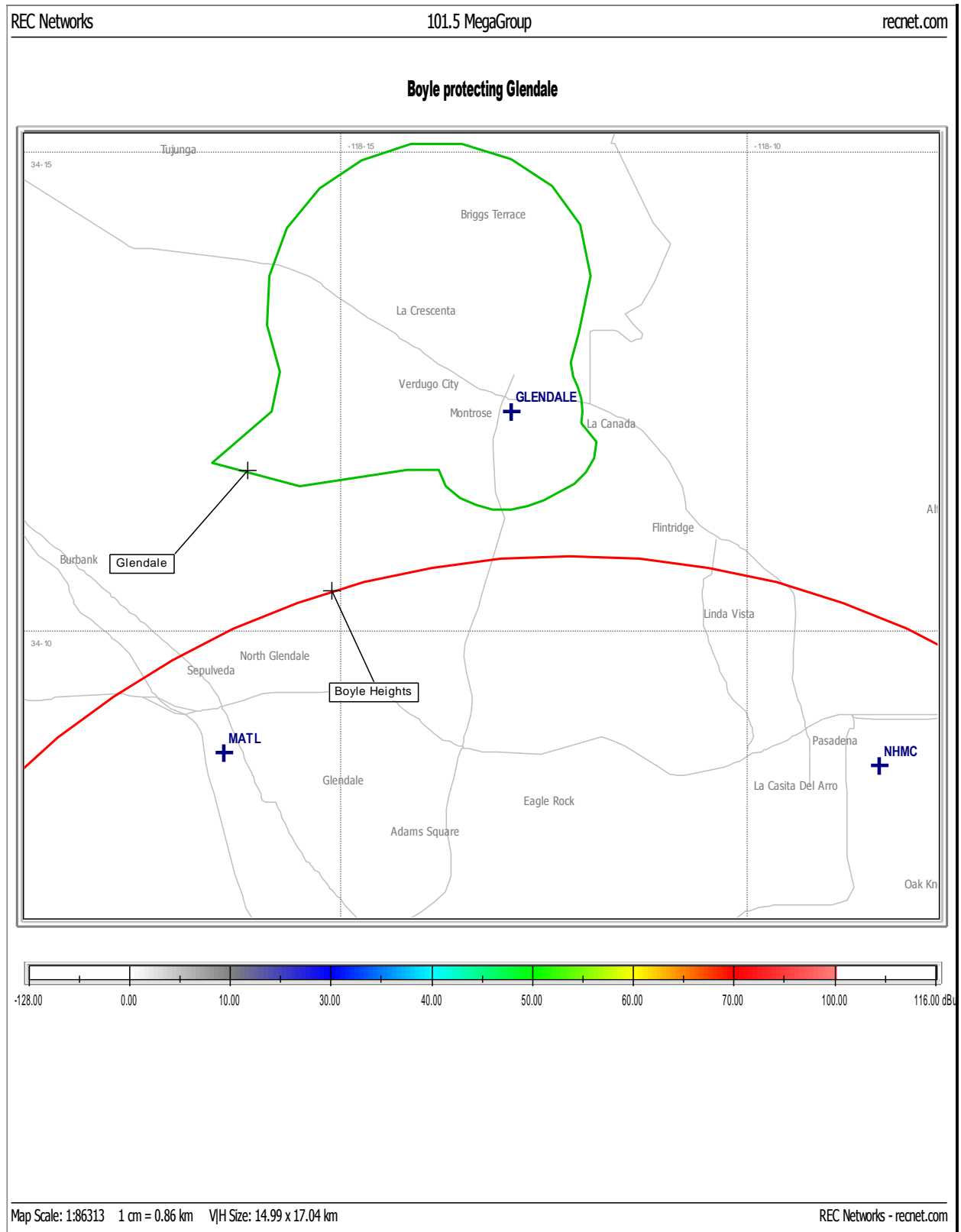


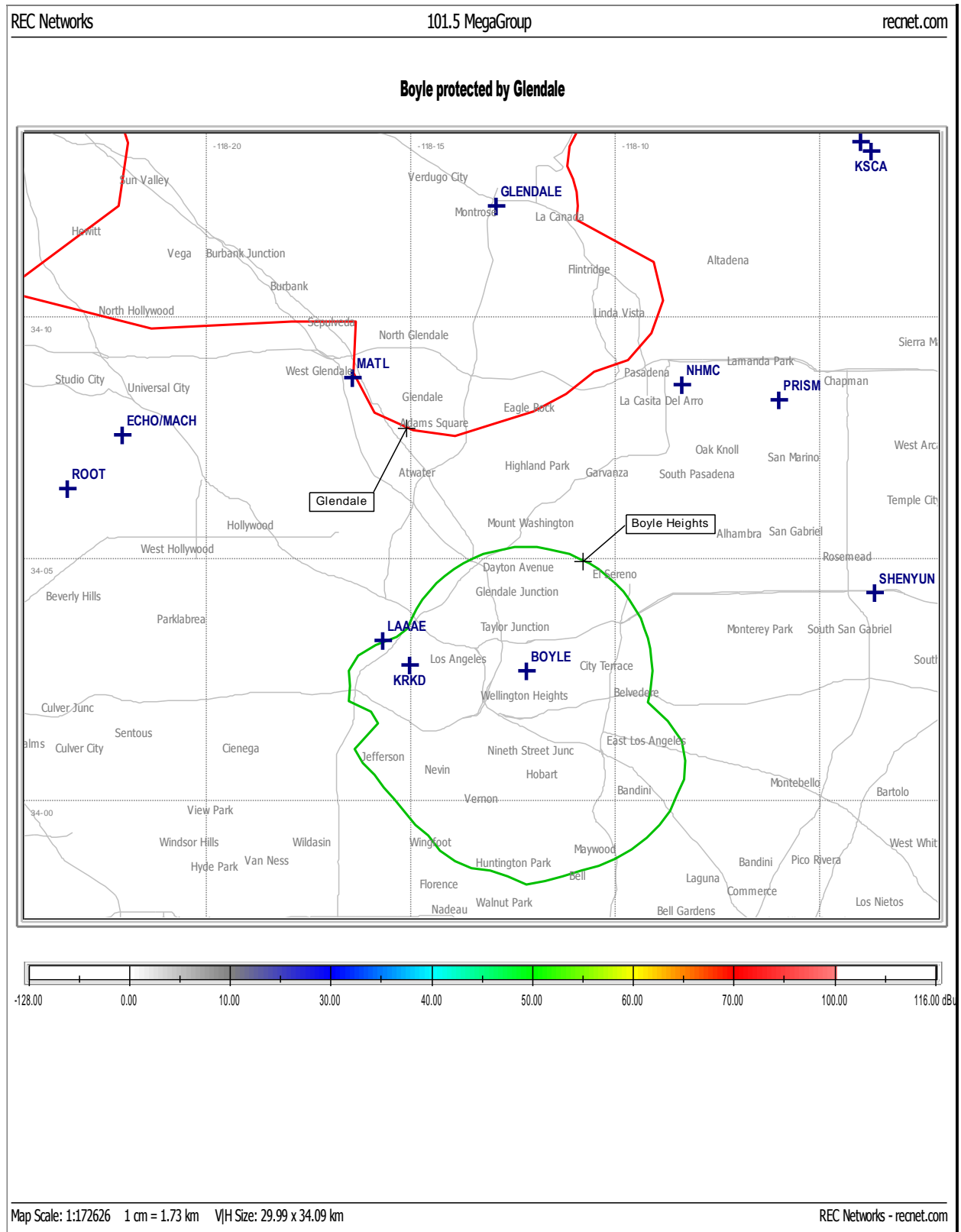




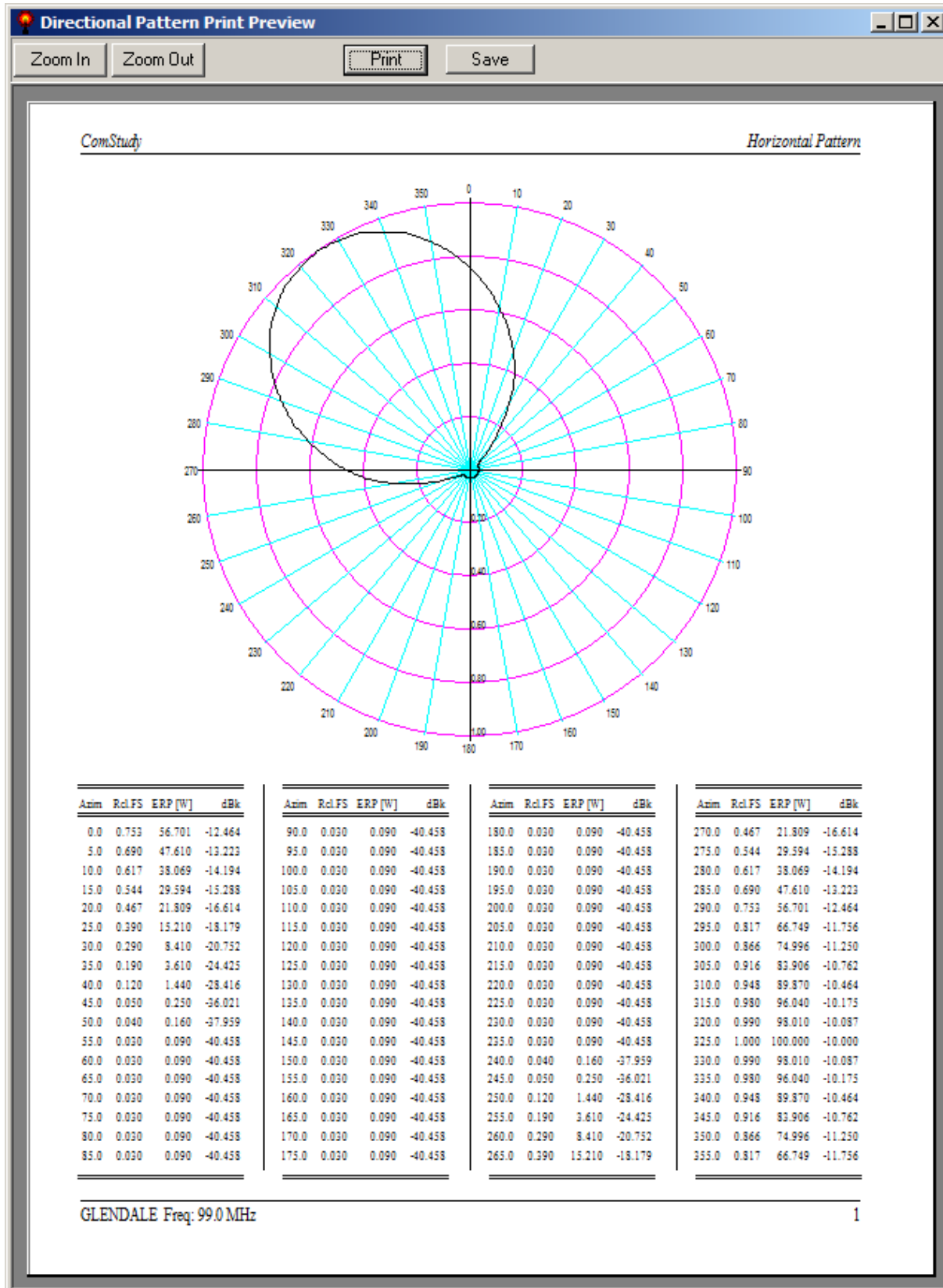




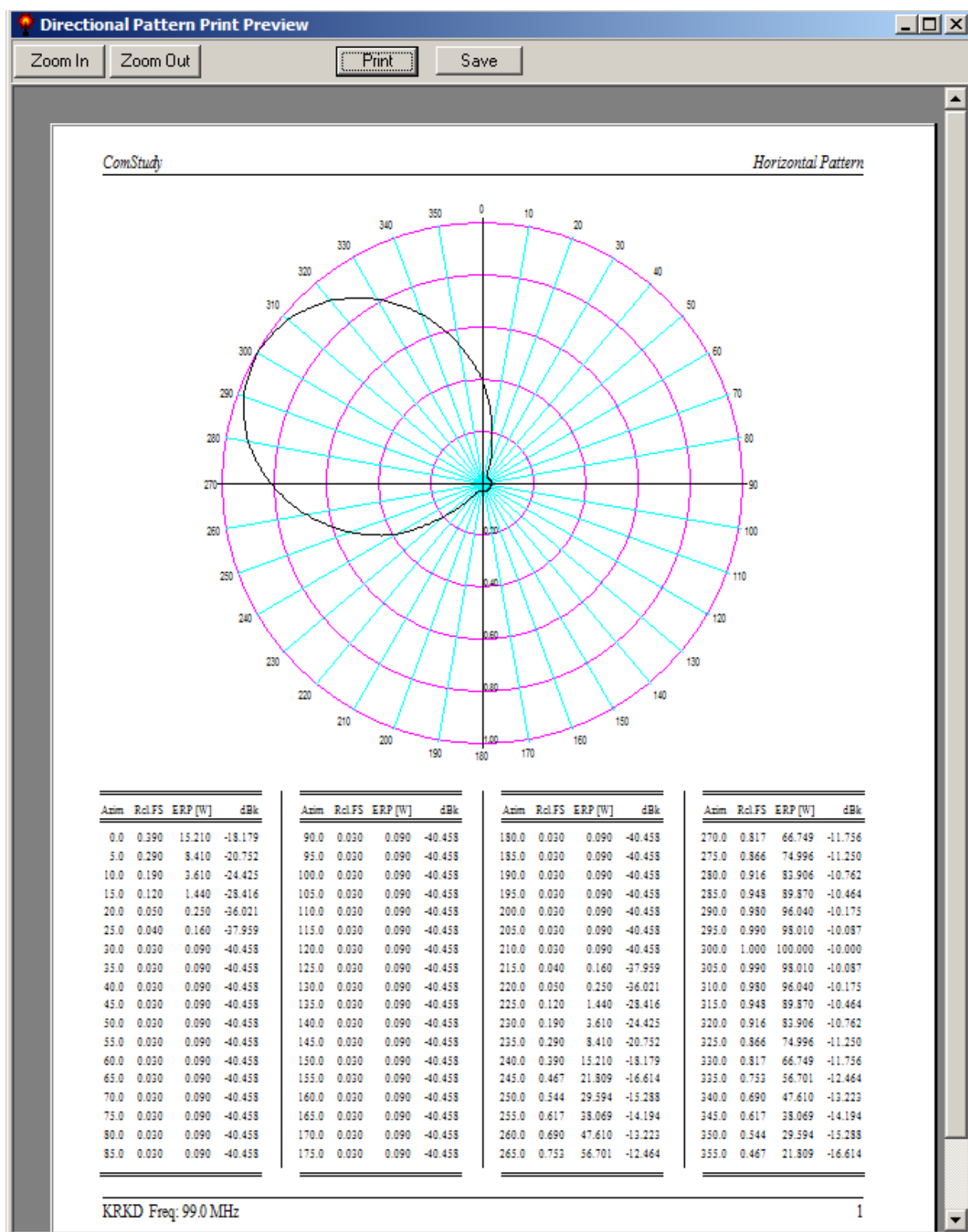




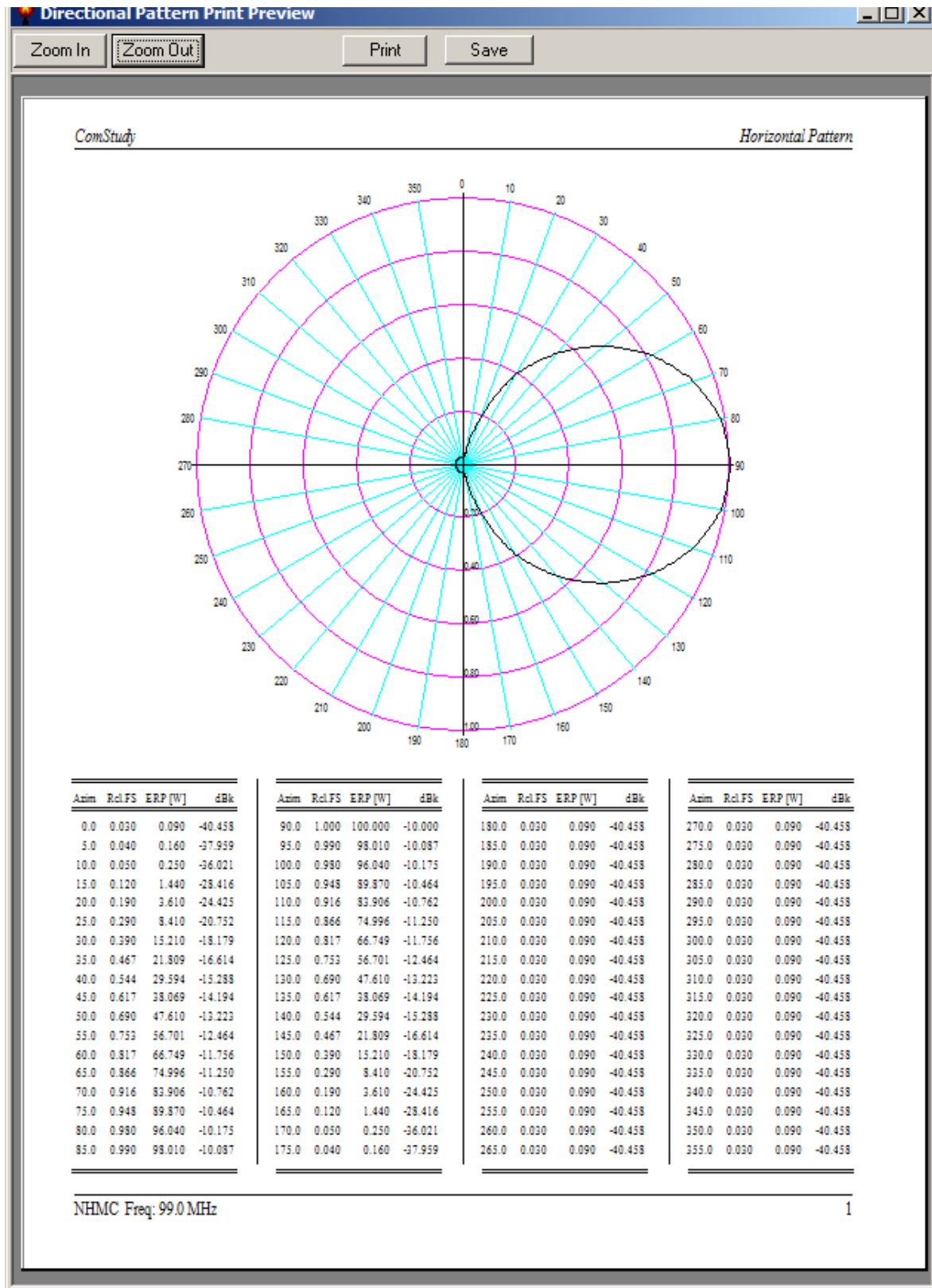
GLENDALE DIRECTIONAL PATTERN



KRKD/LAAAE DIRECTIONAL PATTERN



NHMC/PRISM DIRECTIONAL PATTERN



SHEN YUN DIRECTIONAL PATTERN

