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Stamp and Return

March 6, 2008

Marlene H Dortch, Secretary
Federal Communications Commission
Digital Radio Notification
445 Twelfth Street, SW
Room 2-B450
Washington, DC 20554

FILED/ACCEPTED
MAR 10 2008
Federal Communications Commission
Office of the Secretary

RE: KITF (FM), International Falls, MN
Facility Identification Number: 122662
Main Studio Rule Waiver request

Dear Ms. Dortch:

On December 18, 2007 Minnesota Public Radio ("MPR") was granted a construction permit (Permit File Number BNPED-20071016DJY) for KITF. This CP does not include a main studio rule waiver, as requested by MPR.

The history of this application is that it was originally filed January 19, 2000. This original application included a Main Studio Rule waiver request (see attached Exhibit #E3, Main Studio Request for International Falls, MN). That Main Studio Rule waiver request described MPR's two "primary" stations in Minneapolis/St Paul, KSJN and KNOW. The format of KSJN is classical music. The format of KNOW is news and information. The original Main Studio Rule waiver request asked that this new station be a satellite station of KSJN.

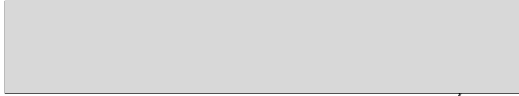
During the noncommercial filing window in October, 2007, MPR filed an amendment to the application and indicated that a main studio request waiver had previously been requested (see Exhibit 13 of Minor Modification application FCC File No BMPED – 20000119ACU – copy of Exhibit 13 attached to this letter.)

MPR respectfully renews its request for a main studio rule waiver for KITF. KITF should be listed as a satellite station of KNOW-FM Minneapolis/St Paul. The description in our original Main Studio Rule waiver request of how MPR will maintain contact with the community of International Falls remain true and accurate. The number of people in our MLS Department and the number of incoming calls and emails has changed, but the general concepts remain the same.

Marlene H Dortch
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Please feel free to contact me directly with any questions, or our outside counsel, Todd Stansbury of the Washington DC law firm of Wiley Rein. Mr Stansbury can be reached at (202) 719-4948 or tstansbury@wileyrein.com.

Sincerely,



Mitzi T Gramling
Associate General Counsel

Cc: Penelope Dade

Exhibit #E3, Page 2
Main Studio Exhibit for International Falls, Minnesota

Minnesota Public Radio

consolidated operations:

In the past, we have recognized the benefits of centralized operations for noncommercial educational stations, given the limited funding available to these stations, and we have granted waivers to state and regional public television and radio networks to operate "satellite" stations that do not necessarily meet the requirements of a main studio.

Main Studio Program Origination Rules, 3 FCC Rcd. 5024, 5027 (1988) (citing Nebraska Educational Television Commission, 4 R.R.2d 771 (1965)). Indeed, the Commission has previously determined that waiver of the main studio rule for other stations in the MPR network serves the public interest. See Letter from Linda Blair, Chief, Audio Services Division to Todd M. Stansbury, dated May 31, 1996 (attached hereto); see also Letter from Dennis Williams, Assistant Chief, Audio Services Division to Todd M. Stansbury, dated November 6, 1995, File No. BPED-9508101A.

Upon grant of this request, MPR will satisfy the public needs and interests of residents of International Falls by the following means:

- MPR maintains a toll-free telephone line by which the residents of the International Falls area can reach MPR management to express concerns about the station operations. This toll-free telephone number goes into MPR's Member Listener Services (MLS) Department. MPR currently has 6 live phone lines and 7 full-time employees who answer the phones and emails. In the past year, MLS has handled about 60,000 incoming calls on every subject you can think of related to MPR, including comments and questions about programming on both services. In addition, MLS has handled about 9,000 email messages in the past year. While the number of phone lines and employees may change with time, MPR's commitment to maintain easy access is strong.
- MPR currently has one person in Saint Paul who is responsible for the final decisions on all programming on MPR stations. MPR has a news director and a classical music director who report to this person. Listener comments from MLS go to this person, who then distributes comments about the music service to the music programming people, and comments about news programming to the news programming director. Summaries of comments about both services are widely distributed throughout the company and to the Board. The current organizational structure may change with time, but the commitment to maintain control of programming and circulate listener opinions will not change.
- MPR has established a site on the World Wide Web (<http://www.mpr.org>) that enables local residents to receive extensive information regarding MPR's programming and provides a link for local residents to email concerns about the station operations to MPR management. The site contains descriptions of special reports, schedules for news and classical music programming,

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and on-line audio sources for MPR programming, including its radio series *A Prairie Home Companion*®. In addition, MPR has established home pages on the MPR Web Site for its network stations. When the proposed station is constructed, MPR will add the proposed station to the Web Site list.

- MPR operates the largest news organization of any radio service in the Midwest. With this extensive news resource, MPR is able to produce news, arts and cultural programming from throughout MPR's service area and distribute it to all stations in the network. MPR's staff located in nearby Bemidji, MN and the staff in Saint Paul already subscribe to the local and area publications and maintain ongoing relationships with community residents and leaders, who are periodically contacted regarding local events and developments, including local arts and cultural events. MPR's staff uses information provided by these contacts to keep the communities it is involved in informed about local and regional arts and cultural events and to keep classical music hosts informed about these events for broadcast by MPR either regionally or throughout the MPR multi-state network. In addition, MPR broadcasts news reports on its classical music service.

The Commission has relied on substantially similar representations by MPR in finding that waivers of the main studio rule for other stations served the public interest. Thus, the Commission has held that where MPR has pledged to (1) continue its policy for local residents to serve on a RDAC; (2) continue the relationship with the local community through membership; (3) solicit comment from residents regarding station operation and programming; (4) maintaining a local toll-free telephone number; and (5) operating a site on the world wide web, a waiver is warranted. See Letter from Linda Blair, Chief, Audio Services Division, Mass Media Bureau, to Todd M. Stansbury, Ref. No. 1800B3-ALM (Oct. 16, 1998) (waiving the main studio rule for KNGA(FM), St. Peter, MN). MPR is making the same pledges with respect to the International Falls stations.

For the foregoing reasons, MPR submits that it will be able to ascertain and satisfy the interests and need of residents of the International Falls area and, therefore, respectfully requests that the Commission grant this waiver of the main studio rule for the proposed station.

Mitzi T Gramling

Exhibit 12

Description: EXHIBIT 12 / TRANSLATOR STATIONS

APPLICANT CURRENTLY OPERATES TRANSLATORS K201CN AND K249BK IN INTERNATIONAL FALLS. UPON COMMENCEMENT OF OPERATION OF THE PROPOSED FULL-SERVICE STATION (I.E. UPON ITS FILING OF A LICENSE APPLICATION AND RECEIPT OF PROGRAM TEST AUTHORITY), APPLICANT WILL REQUEST CANCELLATION OF THE LICENSE FOR K201CN, WHICH CURRENTLY REBROADCASTS KNBJ (BEMIDJI, MN).

Attachment 12

Exhibit 13

Description: EXHIBIT 13 / REQUEST FOR MSR WAIVER

REQUEST TO WAIVE THE MAIN STUDIO RULE WAS MADE WITH THE ORIGINAL APPLICATION, FILE NO. BNPED-20000119ACU.

Attachment 13

Exhibit 16

Description: CONTOUR OVERLAP REQUIREMENTS

Attachment 16

Description
Exhibit #16, Contour Overlap Requirements

Exhibit 19

Description: (blank)

PLEASE SEE ORIGINAL APPLICATION BNPED20000119ACU

Attachment 19

Exhibit 22

Description: ENVIRONMENTAL PROTECTION ACT

THE APPLICANT WILL CONDUCT ENVIRONMENTAL TESTING, SHOULD THE INSTANT PROPOSAL BE ACCEPTED. ATTACHED IS A PROPOSAL FROM DYNAMIC ENVIRONMENTAL ASSOCIATES TO CONDUCT SUCH TESTING.

Attachment 22

Description
Exhibit #22, Environmental Protection Act
