

Mitzi T Gramling  
Associate General Counsel

Stamp and Return  
Minnesota  
Public  
Radio

June 16, 2005

HAND DELIVERED

Marlene Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, NE  
Washington DC 20002

RECEIVED

JUN 20 2005

Federal Communications Commission  
Office of Secretary

Re: KNOW-FM, Minneapolis-Saint Paul, MN  
Facility ID No. 42949  
Minnesota Public Radio (FRN 0002-6425-10)  
Request for Extension of Special Temporary Authority

Dear Ms Dortch:

On behalf of Minnesota Public Radio ("MPR"), licensee of KNOW-FM, Minneapolis-Saint Paul, Minnesota, this is to request further special temporary authority to operate at variance with licensed parameters due to the temporary loss of antenna tower space. The current STA expires June 23, 2005.

As noted in MPR's original request for STA, KNOW-FM's antenna had to be relocated because of the construction of a new digital television station. At the time of the relocation, the tower site owner made a commitment to MPR in writing of its intent to return KNOW-FM as promptly as possible to a new spot high on the current tower or on a neighboring tower.

It recently came to MPR's attention that there is a question about the exact height of KNOW-FM's antenna on the tower. MPR therefore recently hired a surveyor who determined that the antenna is located slightly lower on the tower than stated in KNOW-FM's original STA request. The corrected parameters of KNOW-FM's temporary operations are as follows:

ERP:	100 kW
TPO:	22.750 kW
COR HAGL	899 feet (274 meters)
Line Length	1033 feet (314 meters)

Also, attached to this letter is a revised RF Exposure Determination.

As previously reported, since the initial STA was granted, the parties are diligently working together towards finding a way to move KNOW-FM to a new high spot. In the original STA request, we stated that the parties considered either a combined operation on the tower, which would result in MPR moving back up to its licensed height on the tower it currently is on, or a combined operation on a neighboring tower. Either move would place MPR's antenna back to its currently licensed height.

As previously reported, MPR retained the services of outside consultants to prepare a feasibility study for MPR to present to the tower owner and other parties. That study and previous studies concluded that a combined facility on the tower or a neighboring tower is most likely prohibitively expensive, nor is a move up on the tower we are currently on likely.

However, since the grant of the most recent STAs, several of the other tower tenants have reconsidered their positions and are now thinking that due to their interest in converting to digital radio, a new combined antenna makes both technical and financial sense. Thus, MPR and the other tower tenants have renewed their conversations about a combined antenna. Last summer MPR made a formal presentation to the group as a whole and in early May, 2005 MPR made a specific technical and financial proposal to other tower tenants to form a new partnership to build a new eight-bay master panel antenna higher up on the tower capable of broadcasting a number of stations. The initial response to our term sheet is positive, but to date the arrangement has not been formally approved or accepted by our potential partners. However, the tower owner has agreed to MPR's May, 2005 proposal.

MPR remains hopeful and has reason to believe that this combined antenna solution will result in action.

MPR therefore respectfully requests an additional grant of STA for KNOW-FM to continue to operate as described in its previous correspondence.

Because MPR is a noncommercial, educational licensee, no filing fee is required with this request. An Anti-Drug Abuse Act Certification form is attached.

Marlene Dortch  
September 13, 2004  
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Please contact this office or our outside counsel, Todd Stansbury at Wiley Rein & Fielding (202) 719-7000, if there are any questions.

Sincerely,

A rectangular area of the document is redacted with a solid grey fill, obscuring the signature and any handwritten notes that might have been present.

Mitzi T Gramling / J  
Associate General Counsel

Cc: Todd Stansbury, Esq

Attachments (RF Exposure Determination and Anti-Drug Abuse Act Certification)

Attachment

KNOW RF Exposure Determination.

15 June 2005

KNOW uses a side mounted, 10 bay ERI antenna, with its bottom bay located 274 Meters above ground level. It shares the tower multiple TV and FM stations.

KNOW uses circular polarization with an ERP of 100 kW.

The level of RF exposure from this station was calculated using the formula found in OET Bulletin 65, 1997 version, and OET Supplement A, also dated 1997. The maximum levels of exposure were taken from the OET Bulletin; these are 1000 uWatt/cm<sup>2</sup> for the occupational exposure level, and 200 uWatt/cm<sup>2</sup> for the general population exposure level.

The formula used for the FM exposure level was:

$$S = 33.4 (F^2)(ERP) / R^2$$

Where F is a field factor of .2;

ERP is the total of both Horizontal and Vertical ERP;

R is the distance from the bottom bay of the antenna to 2 meters above the ground. (The 2 meters accounts for the height of an average person's head.)

The results are as follows:

Station	Value	UW/cm <sup>2</sup>	Percent Occ	Percent GP
KNOW	Radiation level at 2m above ground	3.6		
KNOW	Percent of Occupational Level		0.4	
KNOW	Percent of General Population Level			1.8

Both total levels are well under the maximum permitted exposure levels, and therefore KNOW complies with the OET exposure requirements.

Because KNOW is but 1.8% of the 200uW/cm<sup>2</sup> limit for General Population exposures, this facility may be excluded from consideration with respect to public and occupational exposure to head level non-ionizing electromagnetic radiation.

Ralph E. Hornberger

Senior Design Engineer

15 June 2005

**Exhibit**

**Anti-Drug Abuse Act Certification**

The applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §853a, or, in the case of a non-individual applicant (eg corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. §1.2002 (b).

Yes []

No []

Minnesota Public Radio



Thomas J Kigin, Executive Vice President

06-16-05

Date