

Stamp and Return

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**MINNESOTA
PUBLIC RADIO®**

June 12, 2009

HAND DELIVERED

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

FILED/ACCEPTED

JUN 16 2009

Federal Communications Commission
Office of the 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 at (currently operating at 274 meters height above ground level) due to the temporary loss of antenna tower space. The current STA expires June 17, 2009.

As noted in MPR's original request for an STA, KNOW-FM's antenna had to be relocated on the tower (the "Telefarm Site Tower I") because of the construction of a new digital television station (KMWB TV). At the time of the relocation, the television station whose radio aperture MPR was using (KARE TV, a member of the Telefarm Antenna Partnership and the owner of the Telefarm site and towers) 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 ("Telefarm Site Tower II").

As previously reported, since the initial STA was granted, the parties have diligently worked together towards finding a way to move KNOW-FM to a new high spot. In the original STA request, we stated that the parties were considering combined operation with another broadcaster on one of the Telefarm Site Towers, which would enable MPR to move back up to its licensed height.

At the request of the licensees of the two other FM stations located on the Telefarm Site Towers, MPR proposed a formal Letter of Intent that provided for the creation of a Master Antenna Partnership. Each of the three radio licensees would give up their current space on their respective towers in return for the right to place a single master

antenna at the highest place available on the Telefarm Site Tower II at a COR HAAT of within three meters of KNOW's currently authorized facilities.

This master antenna would be a panel antenna, thus providing better circular propagation for the stations. It would be a slightly longer antenna than the stations currently use, allowing them to use less electricity to achieve their respective ERPs. It would utilize the most efficient HD radio transmission technique, also providing for the use of less electricity. The Letter of Intent provided for cost and revenue sharing, and anticipated use of the master antenna for other main or auxiliary transmitter sites serving the community. Each of the parties expressed interest in the project, and began discussions with the Telefarm Antenna Partnership (the owner of both towers) based on this proposal.

This additional STA is necessary because, when the Letter of Intent was proposed to the Telefarm Antenna Partnership (made up of three television stations located on the towers at the Telefarm Site), the Partnership responded that the proposal might receive their approval (approval must be unanimous), but only if the terms of revenue sharing were changed. This requirement was created as a result of a dispute that had earlier occurred among them relating to additional uses of the towers. The radio licensees are working through the issues raised by this requirement, in order to come to a new proposal. A draft was proposed and received initial positive indications.

However, several circumstances occurred subsequently, delaying commitment to the letter of intent, on the basis of which MPR would apply for a revised CP at the higher height.

The first is the severe recession that has affected virtually everyone in this economy, but especially the broadcast media, who are reliant on advertising for revenue. While interested in this proposal in principle, the parties were made reluctant to make capital commitments to so large a project without some confidence that funds would be available, especially in light of the following additional circumstances.

The second is the circumstance that the Commission is currently considering the possibility of increasing the power for the digital portion of the FM channel. The proposed design of the master antenna would have been an efficient means of allowing each of the FM stations involved to broadcast in digital. However, that particular design would not have been as efficient in supporting HD radio signals at the higher proposed power. The parties are reluctant to commit to this project without knowing the solution and cost of solving this new problem of higher powered HD signals.

The third circumstance is the conversion of broadcast television from analog to digital, a conversion that was to have occurred in February, 2009 but was delayed to June 12, 2009. This conversion preoccupied all of the engineers involved in the Telefarm Towers

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(I and II), and created uncertainty about the rearrangement of antennas on the Telefarm Towers – some of the TV licensees are moving their digital operation from their initially assigned digital frequency to their legacy analog frequency and abandoning their "digital" antenna, others are abandoning their "analog" antenna for their "digital" antenna. The Telefarm group indicated they were unwilling to commit to the master FM antenna until they could sort these issues.

MPR has strong reason to believe that this Master Antenna Partnership will come to fruition, providing a desirable long term solution. Alternatively, the movement or removal of TV antennas on the Telefarm Towers might open an aperture for the KNOW antenna at the desired height, obviating the need for the Master Antenna.

MPR therefore respectfully requests an additional grant of Special Temporary Authority 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.

Please contact this office or our outside counsel, Todd Stansbury at Wiley Rein (202) 719-7000, if there are any questions.

Sincerely,



Mitzi T Gramling
Associate General Counsel

Cc: Todd Stansbury, Esq

Exhibit

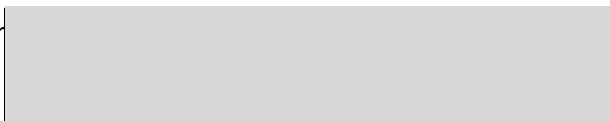
Anti-Drug Abuse Act Certification

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

2009.6.12

Date