

Federal Communications Commission Washington, D.C. 20554  <p style="text-align: center;"><b>FCC 340</b></p>	Approved by OMB 3060-0029 (February 2007)  FOR FCC USE ONLY
<p><b>APPLICATION FOR CONSTRUCTION PERMIT FOR RESERVED CHANNEL NONCOMMERCIAL EDUCATIONAL BROADCAST STATION</b></p> <p>Read INSTRUCTIONS Before Filling Out Form</p>	FOR COMMISSION USE ONLY FILE NO. BNPED - 20071016AHI

**Section I - General Information**

1.	Legal Name of the Licensee/Permittee MINNESOTA PUBLIC RADIO	
	Mailing Address 480 CEDAR STREET	
	City ST. PAUL	State or Country (if foreign address) MN
	Zip Code 55101 -	
	Telephone Number (include area code) 6512901259	E-Mail Address (if available) FCCFILING@MPR.ORG
	FCC Registration Number: 0002642510	Call Sign  Facility Identifier 172758
2.	Contact Representative (if other than licensee/Permittee) TODD M STANSBURY	Firm or Company Name WILEY REIN LLP
	Telephone Number (include area code) 2027194948	E-Mail Address (if available) TSTANSBURY@WILEYREIN.COM
3.	Is this application being filed in response to a window? If Yes, specify closing date 10/19/2007 and/or window number:	<input checked="" type="radio"/> Yes <input type="radio"/> No
4	<p><b>Application Purpose</b></p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input checked="" type="radio"/> New station  <input type="radio"/> Major Change in licensed facility  <input type="radio"/> Minor Change in licensed facility         </div> <div style="width: 45%;"> <input type="radio"/> Major Modification of construction permit  <input type="radio"/> Minor Modification of construction permit  <input type="radio"/> Major Amendment to pending application  <input type="radio"/> Minor Amendment to pending application         </div> </div> <p>(a) File number of original construction permit: -</p> <p>(b) Service Type: <input checked="" type="radio"/> FM <input type="radio"/> TV <input type="radio"/> DTV</p> <p>(c) Community of License:          City: ELY State: MN</p> <p>(d) Facility Type <input checked="" type="radio"/> Main <input type="radio"/> Auxiliary</p> <p>If an amendment, <b>submit as an Exhibit</b> a listing by Section and Question Number the portions of the pending application that are being revised. <span style="float: right;">[Exhibit 1]</span></p>	

**NOTE: The failure to include an explanatory providing full particulars in connection with a "No" response may result in dismissal of the application. See Instructions, paragraph L for additional information regarding completion**

of explanatory exhibits.

**SECTION II - Legal and Financial**

1.	<p><b>Certification.</b> Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
2.	<p><b>Eligibility.</b> Each application must answer "Yes" to one and "No" to two of the three following certifications. An applicant should not submit an explanatory exhibit in connection with these Question 2 "No" responses.</p> <p>The applicant certifies that it is:</p> <p>a. a nonprofit educationl institution; or</p> <p>b. a governmental entity other than a school; or</p> <p>c. a nonprofit educationl organization, other than described in a. or b.</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p><input type="radio"/> Yes <input checked="" type="radio"/> No</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
3.	<p>For applicants checking "Yes" to question 2(c) and applying for a new noncommercial educationl television station only, the applicant certifies that the applicant's officers, directors and members of its governing board are broadly representative of the educational, cultural, and civic segments of the principal community to be served.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input checked="" type="radio"/> N/A</p>
4.	<p>a. The applicant certifies that the Commission has previously granted a broadcast application identified here by file number that found this applicant qualified as a noncommercial educational entity with a qualifying educational program, and that the applicant will use the proposed station to advance a program similar to that the Commission has found qualifying in applicant's previous application.</p> <p>b. Applicants who answered "No" to Question 4(a), must include an exhibit that describes the applicant's educational objective and how the proposed station will be used to advance an educational program that will further that objective according to 47 C.F.R. Section 73.503 (for radio applicants) and 47 C.F.R. Section 73.621 (for television applicants).</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>FCC FileNumber BMLED- 940420KA</p> <p>[Exhibit 2]</p>
5.	<p>The applicant certifies that its governing documents (e.g., articles of incorporation, by-laws, charter, enabling statute, and/or other pertinent organizational document) permit the applicant to advance an educational program and that there is no provision in any of those documents that would restrict the applicant from advancing an educational program or complying with any Commission rule, policy, or provision of the Communications Act of 1934, as amended.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
6.	<p>a. <b>Parties to the Application.</b> List separately each party to the application including, as applicable, the applicant, its officers, directors, five percent or greater stockholders, non-insulated partners, members, and all other persons and entities with attributable interests. If another entity hold an attributable interest in the applicant, list separately, as applicable, its officers, directors, five percent or greater stockholders, non-insulated partners, and board members. Create a separate row for each individual or entity. Attach additional pages if necessary.</p> <p>[Enter Parties/Owners Information]</p> <hr/> <p style="text-align: center;"><b>Parties to the Application</b></p> <p>List separately each party to the application including, as applicable, the applicant, its officers, directors, five percent or greater stockholders, non-insulated partners, members, and all other persons and entities with attributable interests. If another entity hold an attributable interest in the applicant, list separately, as applicable, its officers, directors, five percent or</p>	

greater stockholders, non-insulated partners, and board members. Create a separate row for each individual or entity. Attach additional pages if necessary.

(a) Name and Residence Address(es)	(b) Citizen-ship	(c) Positional Interest: Officer, director, investor/creditor attributable under the Commission's equity/debt plus standard, etc	(d) Director or Member of Governing Board	(e)% of:			(f) % of Total Assets (equity plus debt)
				Ownership(O) or Voting Stock(VS) or Membership (M)	Owner-ship (O) or	Voting Stock (VS) or	
PLEASE SEE ATTACHMENT TO EXHIBIT 3			<input type="radio"/> Yes <input type="radio"/> No				

b. Applicant certifies that equity and financial interests not set forth above are non-attributable pursuant to 47 C.F.R. Section 73.3555 and that there are no agreements or understandings with any non-party that would give influence over the applicant's programming, personnel, or finances to that non-party.

Yes  No  
[Exhibit 3]

7. **Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest pursuant to the notes to 47 C.F.R. Section 73.3555.

N/A  
[Exhibit 4]

8. **Character Issues.** Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:

a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or

b. any pending broadcast application in which character issues have been raised.

Yes  No

See Explanation in [Exhibit 5]

9. **Adverse Findings.** Applicant certifies that, with respect to the applicant, any party to the application, and any non-party equity owner in the applicant, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.

Yes  No

See Explanation in [Exhibit 6]

If the answer is "No," attach as an Exhibit a full disclosure concerning the persons and matters involved, including an identification of the the court or administrative body and the proceeding (by dates and file numbers), and a description of the disposition of the matter. Where the requisite information has been earlier disclosed in connection with another application or as required by 47 C.F.R. Section 1.65, the applicant need only provide: (i) an identification of that previous submission by reference to the file number in the case of an application, the call letters of the station regarding which the application or Section 1.65 information was filed, and the date of filing; and (ii) the disposition of the previously reported matter.

10. **Alien Ownership and Control.** Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.

Yes  No

See Explanation in [Exhibit 7]

11. **Program Service Certification.** Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.

Yes  No

12. **Local Public Notice.** Applicant certifies compliance with the public notice requirements of

Yes  No

	47 C.F.R. Section 73.3580.	
13.	<b>Anti-Drug Abuse Act Certification.</b> Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No
14.	<b>Equal Employment Opportunity (EEO).</b> If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
<b>QUESTIONS 15, 16 AND 17 APPLY ONLY TO APPLICANTS FOR NEW STATIONS. OTHER APPLICANTS CAN PROCEED TO QUESTION 18.</b>		
15.	<b>Financial.</b> The applicant certifies that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without revenue.  If "No" to 15., answer question 16. and 17.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 8]
16.	Is this application contingent upon receipt of a grant from the National Telecommunications and Information Administration?	<input type="radio"/> Yes <input type="radio"/> No
17.	Is this application contingent upon receipt of a grant from a charitable organization, the approval of the budget of a school or university, or an appropriation from a state, county, municipality or other political subdivision?	<input type="radio"/> Yes <input type="radio"/> No
NOTE: If Yes to 16. <b>or</b> 17., the application cannot be granted unconditionally until all of the necessary funds are committed or appropriated. In the case of grants from the National Telecommunications and Information Administration, no further action on the applicant's part is required. If the applicant relies on funds from a source specified in Question 17., <b>the applicant must advise the Commission when the funds are committed or appropriated.</b> This should be accomplished by letter amendment to the application. Applicants should take note that the Commission's construction period is not considered "tolled" by funding difficulties and that any permit granted conditionally on funding will expire if the station is not constructed for any reason, including lack of funding.		
<b>QUESTIONS 18 AND 19 DO NOT APPLY TO APPLICATIONS FOR NEW STATIONS. APPLICANTS FOR NEW FM STATIONS CAN PROCEED TO SECTION III. APPLICANTS FOR NEW TV STATIONS CAN PROCEED TO SECTION IV.</b>		
<b>Holding Period.</b>		
18.	Applicant certifies that this application does not propose a modification to an authorization that was awarded on the basis of a preference for fair distribution of service pursuant to 47 U.S.C. Section 307(b).  If "No," answer a. and b. below. If applicant answers "No" to 18. above and cannot answer "Yes" to either a. or b. below, the application is unacceptable.  a. Applicant certifies that the proposed modification will not downgrade service to the area on which the Section 307(b) preference was based.  b. Applicant certifies that although it proposes to downgrade service to the area on which the Section 307(b) preference was based, applicant has provided full service to that area for a period of four years of on-air operations.	<input type="radio"/> Yes <input type="radio"/> No  <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Yes <input type="radio"/> No
19.	Applicant certifies that this application does not propose a modification to an authorized station that received a credit for superior technical parameters under the point system selection method in 47 C.F.R. Section 73.7003.  If "No," applicant must be able to answer "Yes" to a. below or provide an exhibit that makes a compelling showing that the downgrade would be in the public interest.  a. Applicant certifies that the population and area within the proposed service contour (60 dBu (FM) or grade B (TV)) are greater than or equivalent to those authorized.	<input type="radio"/> Yes <input type="radio"/> No  <input type="radio"/> Yes <input type="radio"/> No [Exhibit 9]

**Section III**

**Fair Distribution of Service Pursuant to 47 U.S.C. Section 307(b) (New and Major Changes to FM Radio Only)** (Other applicants can proceed to Section IV).

1.	Applicant certifies that the proposed station will provide a first noncommercial educational aural service to (a) at least 10 percent of the people residing within the station's 60 dBu (1mV/m) service contour <b>and</b> (b) to a minimum of 2,000 people. Applicants answering "Yes" must provide an Exhibit.	<input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 10]
2.	Applicant certifies that the proposed station will provide a second noncommercial educational aural service to (a) at least 10 percent of the people residing within the station's 60 dBu (1mV/m) service contour <b>and</b> (b) to a minimum of 2,000 people. Applicants answering "Yes" must provide an Exhibit.	<input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 11]

**Section IV Point System Factors - New and Major Change Applications Only** (used to select among mutually exclusive radio and television applications for new stations and major modifications) **NOTE:** Applicants will not receive any additional points for amendments made after the close of the application filing window.

1.	<b>Established Local Applicant:</b> Applicant certifies that for at least the 24 months immediately prior to application, and continuing through the present, it qualifies as a local applicant pursuant to 47 C.F.R. Section 73.7000, that its governing documents require that such localism be maintained, and that it has placed documentation of its qualifications as an established local applicant in a local public inspection file and has submitted to the Commission copies of the documentation.	<input type="radio"/> Yes <input checked="" type="radio"/> No
2.	<b>Diversity of Ownership:</b> (a) Applicant certifies that the principal community (city grade) contour of the proposed station does not overlap the principal community contour of any other authorized station (comparing radio and television to television, including non-fill-in translator stations other than those identified in 2(b) below) in which any party to the application has an attributable interest as defined in 47 C.F.R. Section 73.3555, that its governing documents require that such diversity be maintained, and that it has placed documentation of its diversity qualification in a local public inspection file and has submitted to the Commission copies of the documentation.	<input type="radio"/> Yes <input checked="" type="radio"/> No
	(b) Is the application's certification to 2(a) based on its exclusion of translator station(s) that will be replaced with a full service station pursuant to the authorization requested here?  If Yes, applicant must include an exhibit identifying the translator station authorization for which it will request cancellation 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).	<input type="radio"/> Yes <input checked="" type="radio"/> No [Exhibit 12]
3.	<b>State-wide Network:</b> Applicant certifies that (a) it has NOT claimed a credit for diversity of ownership above; (b) it is one of the three specific types of organizations described in 47 C.F.R. Section 73.7003(b)(3); and (c) it has placed documentation of its qualifications in a local public inspection file and has submitted to the Commission copies of the documentation.	<input type="radio"/> Yes <input checked="" type="radio"/> No
4.	<b>Technical Parameters:</b> Applicant certifies that the numbers in the boxes below accurately reflect the new area and population that its proposal would serve with a 60 dBu (FM) or Grade B (TV) signal measured in accordance with the standard predicted contours in 47 C.F.R. Section 73.713(c) (FM) and 73.683(TV) and that it has documented the basis for its calculations in the local public inspection file and has submitted copies to the Commission. Major modification applicants should include the area of proposed increase only (exclude any area already within the station's existing service area). (Points, if any, will be determined by FCC)	<input checked="" type="radio"/> Yes <input type="radio"/> No
	New area served in square kilometers (excluding areas of water):	4491
	Population served based on the most recent census block data from the United States Bureau of Census using the centroid method:	10518

**SECTION V - Tie Breakers - New and Major Change Applications Only** (used to choose among competing radio and television applications receiving the same number of points in Section IV)

1.	<b>Existing Authorizations.</b> By placing a number in the box, the applicant certifies that it and other parties to the application have, as of the date of filing and pursuant to 47 C.F.R. Section 73.3555, attributable interests in the stated number of relevant broadcast station authorizations. Radio applicants should count all attributable full service radio stations, AM and FM, commercial and noncommercial, and FM translator stations other than fill-in stations or those identified in IV (2)(b) above. TV applicants should count all attributable full service TV stations, commercial and noncommercial and TV translator stations other than fill-in stations or those identified in IV(2)(b) above.
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	64 (number of commercial and non-commercial licenses and construction permits)
2.	<b>Pending Applications.</b> By placing a number in the box, the applicant certifies that it and other parties to the application have, as of the date of filing and pursuant to 47 C.F.R. Section 73.3555, attributable interests in the stated number of pending applications for new or major changes to relevant broadcast stations. Radio applicants should count all attributable full service radio stations, AM and FM, commercial and noncommercial, and FM translator stations other than fill-in stations or those identified in IV(2)(b) above. TV applicants should count all attributable full service TV stations, commercial and noncommercial, and TV translator stations other than fill-in stations or those identified in IV(2)(b) above. 11 (number of pending commercial and non-commercial applications)

### Section VI -- Certification

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing THOMAS J KIGIN	Typed or Printed Title of Person Signing EXECUTIVE VICE PRESIDENT
Signature	Date 10/15/2007

### Section VII Preparer's Certification

I certify that I have prepared Section VII (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name KATE MICHLER	Relationship to Applicant (e.g., Consulting Engineer) TECHNICAL CONSULTANT	
Signature	Date 10/12/2007	
Mailing Address DOUG VERNIER TELECOMMUNICATIONS CONSULTANTS 721 WEST 1ST STREET		
City CEDAR FALLS	State or Country (if foreign address) IA	Zip Code 50613-
Telephone Number (include area code) 3192668402	E-Mail Address (if available) KMICHLER@V-SOFT.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

<b>Section VII - FM Engineering</b>	
<b>TECHNICAL SPECIFICATIONS</b> Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.	
<b>TECH BOX</b>	
1.	Channel Number: 207
2.	Class (select one): <input type="radio"/> D <input type="radio"/> A <input type="radio"/> B1 <input type="radio"/> B <input checked="" type="radio"/> C3 <input type="radio"/> C2 <input type="radio"/> C1 <input type="radio"/> C0 <input type="radio"/> C
3.	Antenna Location Coordinates: (NAD 27)

	Latitude: Degrees 47 Minutes 53 Seconds 49.9 <input checked="" type="radio"/> North <input type="radio"/> South											
	Longitude: Degrees 91 Minutes 51 Seconds 50 <input checked="" type="radio"/> West <input type="radio"/> East											
4.	Proposed Assignment Coordinates: (NAD 27) - RESERVED CHANNELS ABOVE 220 ONLY <input checked="" type="checkbox"/> Not Applicable Latitude: Degrees Minutes Seconds <input type="radio"/> North <input type="radio"/> South Longitude: Degrees Minutes Seconds <input type="radio"/> West <input type="radio"/> East											
5.	Antenna Structure Registration Number: 1027881 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA											
6.	Overall Tower Height Above Ground Level: 104.5 meters											
7.	Height of Radiation Center Above Mean Sea Level: 540.5 meters(H) 540.5 meters(V)											
8.	Height of Radiation Center Above Ground Level: 90 meters(H) 90 meters(V)											
9.	Height of Radiation Center Above Average Terrain: 102.6 meters(H) 102.6 meters(V)											
10.	Effective Radiated Power: 24 kW(H) 24 kW(V)											
11.	Maximum Effective Radiated Power: <input checked="" type="checkbox"/> Not Applicable kW(H) kW(V) (Beam-Tilt Antenna ONLY)											
12.	Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional) Rotation (Degrees): <input type="checkbox"/> No Rotation											
	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
	0		10		20		30		40		50	
	60		70		80		90		100		110	
	120		130		140		150		160		170	
	180		190		200		210		220		230	
	240		250		260		270		280		290	
	300		310		320		330		340		350	
	Additional Azimuths											

[Relative Field Polar Plot](#)

<b>NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.</b>	
<b>CERTIFICATION</b>	
<b>AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 12-15.</b>	
13.	<b>Main Studio Location.</b> The proposed main studio location complies with 47 C.F.R. Section 73.1125. <input type="radio"/> Yes <input checked="" type="radio"/> No  See Explanation in [Exhibit 13]
14.	<b>Community Coverage.</b> The proposed facility complies with 47 C.F.R. Section 73.315. (Channels 221 and above) or 47 C.F.R. Section 73.515 (Channels 220 and below). <input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 14]
15.	<b>Interference.</b> The proposed facility complies with all of the following applicable rule <input checked="" type="radio"/> Yes <input type="radio"/> No

	sections. Check all that apply:	See Explanation in [Exhibit 15]
	<b>Contour Overlap Requirements.</b> a. <input checked="" type="checkbox"/> 47 C.F.R. Section 73.509 <b>Exhibit Required.</b>	[Exhibit 16]
	<b>Spacing Requirements.</b> b. <input type="checkbox"/> 47 C.F.R. Section 73.207 with respect to station(s)	
	<b>Grandfathered Short-Spaced.</b> c. <input type="checkbox"/> 47 C.F.R. Section 73.213(a) with respect to station(s) <b>Exhibit Required.</b>	[Exhibit 17]
	<b>Contour Protection.</b> d. <input type="checkbox"/> 47 C.F.R. Section 73.215(a) with respect to station(s) <b>Exhibit Required.</b>	[Exhibit 18]
	<b>Television Channel 6 Protection.</b> e. <input checked="" type="checkbox"/> 47 C.F.R. Section 73.525 with respect to station(s) <b>Exhibit Required.</b>	[Exhibit 19]
16.	<b>Reserved Channels Above 220.</b> a. <b>Availability of Channels.</b> The proposed facility complies with the assignment requirements of 47 C.F.R. Section 73.203.	<input type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 20]
17.	<b>International Borders.</b> The proposed antenna location is not within 320 kilometers of the common border between the United States and Canada or Mexico.  If "No," specify the country and provide an exhibit of compliance with all provisions of the relevant International Agreement.	<input type="radio"/> Yes <input checked="" type="radio"/> No <input checked="" type="radio"/> Canada <input type="radio"/> Mexico [Exhibit 21]
18.	<b>Environmental Protection Act.</b> The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Worksheet #7, an <b>Exhibit is required.</b>  By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.	<input checked="" type="radio"/> Yes <input type="radio"/> No  See Explanation in [Exhibit 22]
19.	<b>Community of License Change - Section 307(b).</b> If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change comports with the fair distribution of service policies underlying Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).  <b>An exhibit is required</b> unless this question is not applicable.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A  [Exhibit 23]
<b>PREPARER'S CERTIFICATION ON PAGE 8 MUST BE COMPLETED AND SIGNED.</b>		

## Exhibits

Exhibit 2



**Description:** EXHIBIT 2 / ELIGIBILITY

PLEASE REFER TO EXHIBIT 4 FOR A COMPLETE LIST OF FACILITIES LICENSED TO THE APPLICANT.

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**Attachment 2**

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**Exhibit 3**

**Description:** EXHIBIT 3 / PARTIES TO THE APPLICATION

THE ATTACHMENT TO THIS EXHIBIT IS A LISTING OF THE BOARDS OF TRUSTEES OF THE APPLICANT, MINNESOTA PUBLIC RADIO, AS WELL AS ITS PARENT COMPANY, AMERICAN PUBLIC MEDIA GROUP. ADDITIONAL INFORMATION ON BOARD MEMBERS AND THEIR BROADCAST INTERESTS IS CONTAINED IN EXHIBIT 4.

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**Attachment 3**

Description
<a href="#">Exh. 3 / Parties to the Application</a>

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**Exhibit 4**

**Description:** EXHIBIT 4 / FACILITIES

THE ATTACHMENT TO THIS EXHIBIT IS A COMPLETE LISTING OF FACILITIES LICENSED TO THE APPLICANT, WITH ADDITIONAL INFORMATION ON BOARD MEMBERS AND THEIR BROADCAST INTERESTS.

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**Attachment 4**

Description
<a href="#">Exh. 4 / Facilities list</a>

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**Exhibit 10**

**Description:** FAIR DISTRIBUTION OF SERVICE - 1ST SERVICE

PLEASE SEE ATTACHED EXHIBIT. 100% OF THE PROPOSED 60 DBU COVERAGE AREA WILL BE FIRST SERVICE.

POPULATION FOR THIS 307B EXHIBIT WAS CALCULATED USING THE 2000 U.S. CENSUS BLOCK LEVEL SF1 POPULATION DATABASE. THE CENTROID METHOD WAS USED WITH 360 RADIALS AND THE AREA WAS CALCULATED USING NUMERIC INTEGRATION FROM THESE RADIALS.

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**Attachment 10**

Description
<a href="#">Exhibit #10, Fair Distribution of Service</a>

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**Exhibit 11**

**Description:** 2ND SERVICE - FAIR DISTRIBUTION OF SERVICE

PLEASE SEE EXHIBIT #10

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**Attachment 11**

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**Exhibit 12**

**Description:** EXHIBIT 12 / TRANSLATOR STATIONS

APPLICANT CURRENTLY OPERATES TRANSLATORS K208CR AND W269AC IN ELY. 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 K208CR, CURRENTLY REBROADCASTING WIRR (VIRGINIA-HIBBING, MN).

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**Attachment 12**

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**Exhibit 13**

**Description:** EXHIBIT 13 / REQUEST FOR MSR WAIVER

SEE ATTACHED REQUEST

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**Attachment 13**

Description
<a href="#">Exh. 13 / MSR waiver request</a>

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**Exhibit 14**

**Description:** COMMUNITY COVERAGE

PLEASE SEE ATTACHED ENGINEERING EXHIBIT

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**Attachment 14**

Description
<a href="#">exhibit #14 Community Service</a>

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**Exhibit 16**

**Description:** CONTOUR OVERLAP REQUIREMENTS

PLEASE SEE ATTACHED ENGINEERING EXHIBIT

---

**Attachment 16**

Description
<a href="#">Exhibit #16, Contour Overlap Requirements</a>

---

**Exhibit 19**

**Description:** TELEVISION CHANNEL 6 PROTECTION

PLEASE SEE ATTACHED ENGINEERING EXHIBIT

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**Attachment 19**

Description
<a href="#">Exhibit 19, Television Channel 6 Protection</a>

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**Exhibit 21**

**Description:** INTERNATIONAL BORDERS

PLEASE SEE ATTACHED ENGINEERING EXHIBIT

---

**Attachment 21**

Description
<a href="#">exhibit 21 International borders</a>

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**Exhibit 22**

**Description:** ENVIRONMENTAL PROTECTION ACT

THE APPLICANT PROPOSES TO USE REGISTERED TOWER ASR #1027881, CONSTRUCTED IN 1992. AS THIS TOWER WAS BUILT BEFORE MARCH 2001, IT IS EXCLUDED FROM FURTHER ENVIRONMENTAL TESTING. ATTACHED IS AN R.F. EMISSIONS COMPLIANCE STATEMENT, SHOWING THAT WORKERS AND THE GENERAL PUBLIC ARE PROTECTED FROM EXCESS RADIO FREQUENCY EMISSIONS.

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**Attachment 22**

Description
<a href="#">Exhibit #22, Environmental Protection Act</a>

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**PARTIES TO THE APPLICATION**

The items below correspond to the columns in the following tables:

- (a) Name and Address
- (b) Citizenship
- (c) Positional Interest
- (d) Director or Member of Governing Board
- (e) Percentage of Votes
- (f) Percentage of Assets (equity plus debt)

**MINNESOTA PUBLIC RADIO (MPR)  
 AMERICAN PUBLIC MEDIA GROUP (APMG)**

(a)	(b)	(c)	(d)	(e)	(f)
Bradbury H Anderson Best Buy Corporate Campus 7601 Penn Avenue South Richfield, MN 55423	US	Trustee (MPR)	Yes	0	0
Andy Bessette The Travelers Companies, Inc. Mail code NB17A 385 Washington Street St. Paul, MN 55102	US	Trustee (MPR)	Yes	0	0
Susan Boren SpencerStuart Suite 2750 225 South Sixth Street Minneapolis, MN 55402	US	Trustee (MPR)	Yes	0	0
George Buckley 3M 3M Center 220-14W-05 St. Paul, MN 55144-1000	UK	Trustee (MPR)	Yes	0	0
Patrick J Denzer John B Collins Associates, Inc. 8500 Normandale Lake Blvd Suite 2400 Bloomington, MN 55437	US	Trustee (MPR)	Yes	0	0

(a)	(b)	(c)	(d)	(e)	(f)
Janet M Dolan Act III Enterprises William Moore Law Firm 7260 University Avenue NE Suite 160 Fridley, MN 55432	US	Trustee (MPR)	Yes	0	0
Ian R Friendly General Mills, Inc. #1 General Mills Blvd Minneapolis, MN 55426	US	Trustee (MPR)	Yes	0	0
Steve Fritze Ecolab, Inc 370 Wabasha Street North St. Paul, MN 55102	US	Trustee (MPR and APMG)	Yes	0	0
Sara H Gavin Weber Shandwick Minneapolis 8000 Norman Center Drive Suite 400 Minneapolis, MN 55437	US	Trustee (MPR and APMG)	Yes	0	0
Randall J Hogan Pentair, Inc 5500 Wayzata Blvd; Suite 800 Golden Valley, MN 55416	US	Trustee (MPR and APMG)	Yes	0	0
Kim R Jenson UBS Financial Services Inc. 800 Nicollet Mall Suite 700 Minneapolis, MN 55402	US	Trustee (MPR)	Yes	0	0
Anita H Kunin 2843 Burnham Blvd Minneapolis, MN 55416-4331	US	Trustee (MPR)	Yes	0	0
Karin L Larson Capital International Research, Inc. 11100 Santa Monica Blvd; 15 <sup>th</sup> Floor Los Angeles, CA 90025	US	Trustee (MPR)	Yes	0	0
Thomas R McBurney McBurney Management Advisors 80 South Eighth Street 4900 IDS Center Minneapolis, MN 55402	US	Trustee (MPR)	Yes	0	0

(a)	(b)	(c)	(d)	(e)	(f)
William R McLaughlin Select Comfort 6105 Trenton Lane North Plymouth, MN 55442	US	Trustee (MPR and APMG)	Yes	0	0
Pamela J Moret Thrivent Financial for Lutherans Mail Stop MS1630 625 4th Avenue South Minneapolis, MN 55415	US	Treasurer, Trustee (MPR and APMG)	Yes	0	0
Glen D Nelson, MD GDN Holdings 301 Carlson Parkway, Suite 315 Minnetonka, MN 55305	US	Chair, Trustee (MPR and APMG)	Yes	0	0
Michael O'Keefe Minneapolis College of Art & Design 2501 Stevens Avenue Minneapolis, MN 55404	US	Trustee (MPR)	Yes	0	0
David John Olderman 25286 Bob White Lane Blackduck, MN 56630	US	Trustee (MPR)	Yes	0	0
James J Phelps Northcrest Corporation 2635 University Avenue West Suite 190 Saint Paul, MN 55114	US	Trustee (MPR)	Yes	0	0
Addison (Tad) Piper Piper Jaffray Companies Inc 800 Nicollet Mall; J09502 Minneapolis, MN 55402	US	Trustee (MPR and APMG)	Yes	0	0
Paul Reyelts The Valspar Corporation 1101 Third Street South Minneapolis, MN 55415	US	Trustee (MPR)	Yes	0	0
Steven M Rothschild Twin Cities RISE! 4525 East Lake Harriett Parkway Minneapolis, MN 55409	US	Trustee (MPR)	Yes	0	0

(a)	(b)	(c)	(d)	(e)	(f)
David R Strand Cleveland Clinic Foundation 9500 Euclid Avenue Mail Code H 18 Cleveland, OH 44195	US	Vice-Chair, Trustee (MPR and APMG)	Yes	0	0
Austin P Sullivan Jr 700 Twelve Oaks Center Drive Suite 252 Wayzata, MN 55391	US	Trustee (MPR and APMG)	Yes	0	0
Dr Richard L Torgerson Luther College 700 College Drive Decorah, IA 52101-1045	US	Trustee (MPR)	Yes	0	0
William Pearce Box 2187 Loop Station Minneapolis, MN 55402	US	Life Trustee (MPR)	Yes	0	0
Robert J Sivertsen 29 Summit Court St. Paul, MN 55102	US	Life Trustee (MPR)	Yes	0	0
Joanne Von Blon 700 Second Street South # 8-1 Minneapolis, MN 55401	US	Life Trustee (MPR)	Yes	0	0
William H Kling Minnesota Public Radio   American Public Media Group 480 Cedar Street Saint Paul, MN 55101	US	President of the Board of Trustees, President (MPR and APMG)	No	0	0
Thomas J Kigin Minnesota Public Radio   American Public Media Group 480 Cedar Street Saint Paul, MN 55101	US	Staff Officer (MPR and APMG)	No	0	0
Jon R McTaggart Minnesota Public Radio   American Public Media Group 480 Cedar Street Saint Paul, MN 55101	US	Staff Officer (MPR and APMG)	No	0	0

(a)	(b)	(c)	(d)	(e)	(f)
Mark E Alfuth Minnesota Public Radio   American Public Media Group 480 Cedar Street Saint Paul, MN 55101	US	Staff Officer (MPR and APMG)	No	0	0
Jon K Gossett Minnesota Public Radio   American Public Media Group 480 Cedar Street Saint Paul, MN 55101	US	Staff Officer (MPR)	No	0	0
Jana V Kanyadan Minnesota Public Radio   American Public Media Group 480 Cedar Street Saint Paul, MN 55101	US	Staff Officer (MPR)	No	0	0
Sarah S Lutman Minnesota Public Radio   American Public Media Group 480 Cedar Street Saint Paul, MN 55101	US	Staff Officer (MPR)	No	0	0
Mary S Nease Minnesota Public Radio   American Public Media Group 480 Cedar Street Saint Paul, MN 55101	US	Staff Officer (MPR and APMG)	No	0	0
Timothy T Roesler Minnesota Public Radio   American Public Media Group 480 Cedar Street Saint Paul, MN 55101	US	Staff Officer (MPR)	No	0	0
JJ Yore American Public Media Los Angeles 261 South Figueroa Street, Suite 200 Los Angeles, CA 90012	US	Staff Officer (MPR)	No	0	0



**FCC Form 340**  
**Exhibit 4**  
**Minnesota Public Radio, FRN 0002-6425-10**

**Page 1**

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This document is responsive to Section II, item 7 of FCC Form 340. A responsible person for this document is Mitzi T Gramling (mgramling@mpr.org, 651.290.1259).

Minnesota Public Radio (MPR) holds licenses and/or construction permits for the following radio broadcast stations, all of which are operated on a noncommercial basis:

<u>CALL SIGN</u>	<u>FACILITY ID</u>	<u>COMMUNITY</u>	<u>FREQUENCY</u>
KRSU-FM	42967	Appleton MN	91.3 MHz
KNCM-FM	42981	Appleton MN	88.5 MHz
KNSE-FM	90889	Austin MN	90.1 MHz
KCRB-FM	42970	Bemidji MN	88.5 MHz
KNBJ-FM	42966	Bemidji MN	91.3 MHz
KBPR-FM	42912	Brainerd MN	90.7 MHz
KBPN-FM	92068	Brainerd MN	88.3 MHz
WIRN-FM	78080	Buhl MN	92.5 MHz
WSCN-FM	42975	Cloquet MN	100.5 MHz
KNSR-FM	42938	Collegeville MN	88.9 MHz
KSJR-FM	42955	Collegeville MN	90.1 MHz
KLCD-FM	42943	Decorah IA	89.5 MHz
KLNI-FM	42932	Decorah IA	88.7 MHz
WSCD-FM	42940	Duluth MN	92.9 MHz
KNWF-FM	92141	Fergus Falls MN	91.5 MHz
KCMF -FM	92307	Fergus Falls MN	89.7 MHz
WMLS -FM	92306	Grand Marais MN	88.7 MHz
WLSN-FM	92302	Grand Marais MN	90.7 MHz
WGGL-FM	42913	Houghton MI	91.1 MHz
KXLC-FM	42918	La Crescent MN	91.1 MHz
KSJN-FM	42911	Minneapolis MN	99.5 MHz
KNOW-FM	42949	Minneapolis/St Paul MN	91.1 MHz
KCCD-FM	42951	Moorhead MN	90.3 MHz
KCCM-FM	42926	Moorhead MN	91.1 MHz
KCMP-FM	62162	Northfield MN	89.3 MHz

<u>CALL SIGN</u>	<u>FACILITY ID</u>	<u>COMMUNITY</u>	<u>FREQUENCY</u>
KMSE-FM	83876	Rochester MN	88.7 MHz
KLSE-FM	42965	Rochester MN	91.7 MHz
KZSE-FM	42929	Rochester MN	90.7 MHz
KRXW-FM	166032	Roseau MN	103.5 MHz
KRSD-FM	42909	Sioux Falls SD	88.1 MHz
KGAC-FM	42910	St Peter MN	90.5 MHz
KNGA-FM	42944	St Peter MN	91.5 MHz
KWRV-FM	42917	Sun Valley ID	91.9 MHz
KNTN-FM	42922	Thief River Falls MN	102.7 MHz
KQMN-FM	42974	Thief River Falls MN	91.5 MHz
WIRR-FM	42957	Virginia/Hibbing MN	90.9 MHz
KNSW-FM	42947	Worthington/Marshall MN	91.7 MHz
KRSW-FM	42958	Worthington MN	89.3 MHz

MPR holds licenses or construction permits for the following noncommercial educational FM translators:

<u>CALL SIGN</u>	<u>FACILITY ID</u>	<u>COMMUNITY</u>	
K280EB	42950	Albert Lea MN	103.9 MHz
K215BL	42971	Alexandria MN	90.9 MHz
K277AD	42979	Austin MN	103.3 MHz
K222BA	141797	Blue Earth MN	92.3 MHz
K270AQ	141824	Blue Earth MN	101.9 MHz
K208CR	86095	Ely MN	89.5 MHz
W269AC	42968	Ely MN	101.7 MHz
K281AB	42969	Grand Rapids MN	104.1 MHz
K297AD	42964	Grand Rapids MN	107.3 MHz
W226AY	141839	Hinckley MN	93.1 MHz
W248AS	141828	Hinckley MN	97.5 MHz
K283AN	141856	Hinckley MN	104.5 MHz

<u>CALL SIGN</u>	<u>FACILITY ID</u>	<u>COMMUNITY</u>	
W293AV	141860	Hinckley MN	106.5 MHz
W224AO	42928	Houghton MI	92.7 MHz
K201CN	42936	International Falls MN	88.1 MHz
K249BK	42973	International Falls MN	97.7 MHz
K201BW	42952	La Crescent MN	88.1 MHz
K276EW	149175	Olivia MN	103.1 MHz
K280ET	152436	Olivia MN	103.9 MHz
K289AE	42948	Owatonna MN	105.7 MHz
K280EC	42961	Owatonna MN	103.9 MHz
K245AK	152818	Redwood Falls MN	96.9 MHz
W215AI	42942	Roseau MN	90.9 MHz
K264AR	141704	Roseau MN	100.7 MHz
K270AB	42978	Winona MN	101.9 MHz
W297AW	42907	Winona MN	107.3 MHz

MPR has the following pending applications for construction permits to build new FM noncommercial radio broadcast stations:

<u>FCC FILE NO.</u>	<u>COMMUNITY</u>	<u>FACILITY ID</u>	<u>FREQUENCY</u>
BNPED 20000119ACU	International Falls, MN	122662	88.3 MHz
BNPED20000119ABW	International Falls, MN	122570	89.7 MHz

MPR has the following pending application for a construction permit to build a new noncommercial translator station:

BNPFT20000316AAE	Minneapolis, MN	122965	91.9 MHz
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MPR holds the following Educational Broadband Service (EBS) licenses or construction permits:

<u>CALL SIGN</u>	<u>COMMUNITY</u>	<u>CHANNEL GROUP</u>
WHR-751	Duluth MN	G1,G2,G3,G4

<u>CALL SIGN</u>	<u>COMMUNITY</u>	<u>CHANNEL GROUP</u>
WHR-765	Fargo ND	C1,C2,C3,C4
WHR-750	St. Cloud MN	B1, B2, B3, B4
WHR-754	Mankato MN	A1,A2,A3,A4
WLX-299	Minneapolis MN	A1,A2,A3,A4
WHR-753	Rochester MN	B1,B2,B3,B4
WHR-752	Sioux Falls SD	B1,B2,B3,B4
WHR-497	St Paul MN	B1,B2,B3,B4

MPR is a wholly owned subsidiary of American Public Media Group (APMG). The Board of Trustees of APMG has certain approval rights with respect to organizational documents of MPR, appointment of certain members of MPR's Board of Trustees, and the sale of all or substantially all of MPR's assets. MPR is a licensee of the Commission. Ownership Reports for MPR and APMG were filed with the Commission most recently on April 30, 2007.

All Trustees and Officers of MPR are US citizens, with the exception of George W Buckley, who is a UK citizen. Trustee/officer William H Kling and officer Thomas J Kigin are on the Board of Directors of Comcast of Saint Paul. Trustee Anita Kunin's four sons and husband collectively own 85% of seven TV stations (KVRR, Fargo, ND; KJRR, Jamestown, ND; KBRR, Thief River Falls, MN; KNRR, Pembina, ND; KDLT, Sioux Falls, SD; KDLV, Mitchell, SD; and KQDS, Duluth, MN) and eighteen radio stations (KQDS-AM, KQDS-FM, KZIO, and WWAX, Duluth, MN; WLMX-FM, Balsam Lake, WI; WXCX, Siren, WI; KGHS and KSDM, International Falls, MN; KKIN-AM and KKIN-FM, Aitkin, MN; KFGI, Crosby, MN; WHSM-AM and WHSM-FM, Hayward, WI; KAOD, Babbitt, MN; KBAJ, Deer River, MN; WXXZ, Grand Marais, MN; WCMP-AM and WCMP-FM, Pine City, MN). Trustee William McLaughlin serves on the Board of Trustees of Carleton College, which is the licensee of KRLX-FM in Northfield, MN.

All Trustees and Officers of APMG are US citizens. Trustee/officer William H Kling and officer Thomas J Kigin are on the Board of Directors of Comcast of Saint Paul.

The Board of Trustees of American Public Media Group (APMG) has certain approval rights with respect to organizational documents of Minnesota Public Radio (MPR), appointment of certain members of MPR's Board of Trustees, and the sale of all or substantially all of MPR's assets.

# Fair Distribution of Service Under 307(b) - 60 dBu Contours

## Ely207

Latitude: 47-53-39.90 N  
 Longitude: 091-51-50 W  
 ERP: 24.00 kW  
 Channel: 207  
 Frequency: 89.3 MHz  
 AMSL Height: 540.6 m  
 Elevation: 450.36 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: None

US Land Area = 4490.7 sq km

■ First Service  
■ Second Service

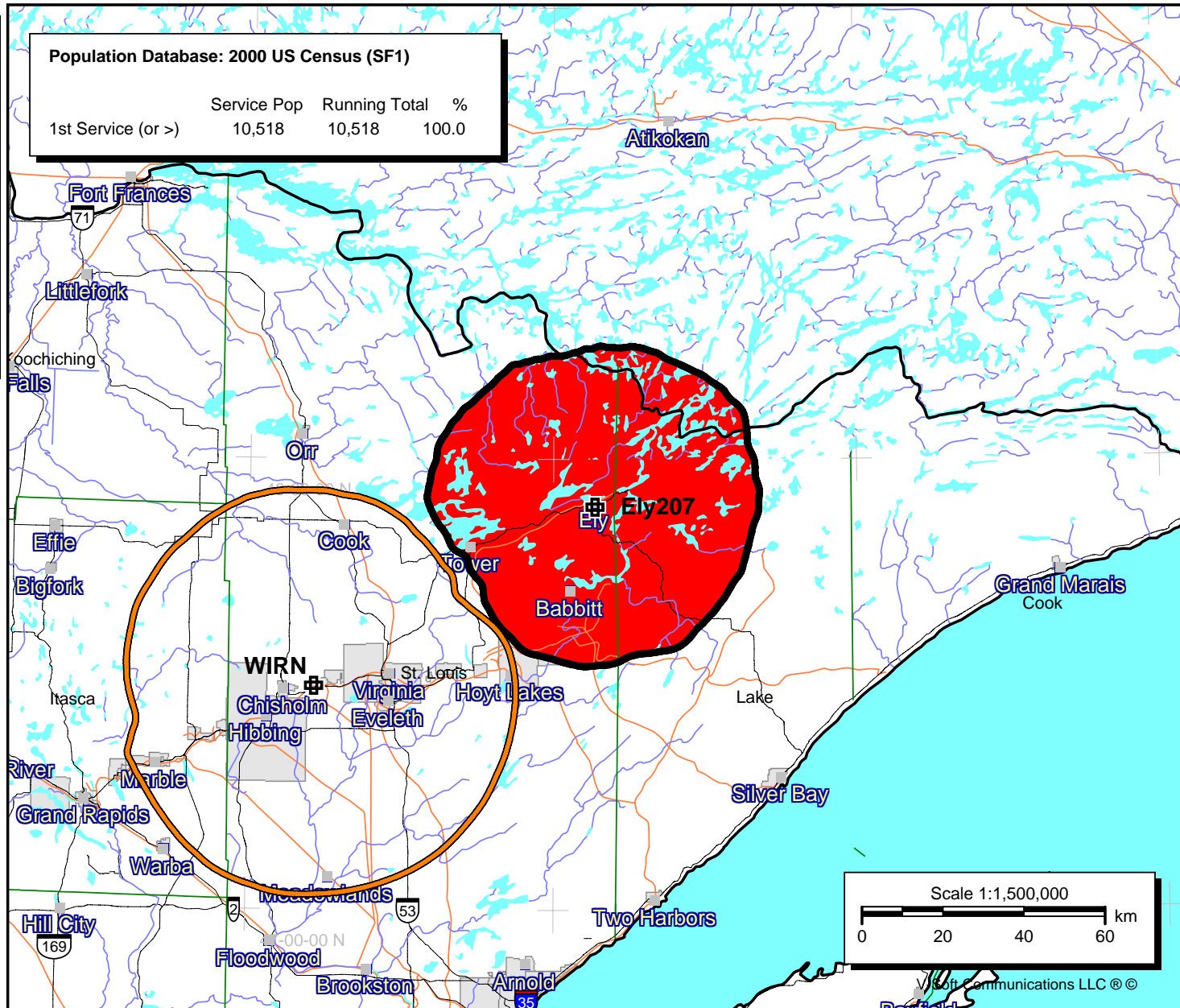
■ Ely207  
■ WIRN

9/17/2007



### Population Database: 2000 US Census (SF1)

	Service Pop	Running Total	%
1st Service (or >)	10,518	10,518	100.0



Soft Communications LLC ©

REQUEST FOR MAIN STUDIO RULE WAIVER

Minnesota Public Radio ("MPR") proposes to operate this facility as new noncommercial educational station to serve Ely and the surrounding area. MPR proposes that the station be operated as a satellite station of either KSJN (FM), KNOW (FM) or KCMP (FM). MPR is the licensee of all three stations. The main studios for KSJN, KNOW and KCMP are all located at 480 Cedar Street, Saint Paul, Minnesota 55101.

MPR is a nonprofit corporation formed for the purpose of providing noncommercial educational radio service to listeners in Minnesota and surrounding states. MPR's current 37 FM and 26 FM translator operating facilities provide 24-hour-a-day quality programming accessible to 98% of Minnesota's citizens, as well as to substantial numbers of listeners in North and South Dakota, Iowa, Wisconsin, Michigan, Idaho and southern Ontario, Canada. MPR provides programming to its network of stations from its primary Minneapolis/Saint Paul stations—KSJN, Minneapolis, KNOW, Minneapolis/Saint Paul and KCMP, Northfield—and from many of its network stations throughout the region. KNOW is an all-news/information station. KSJN is a classical music station and KCMP is a contemporary music/news station. The proposed new station will be operated by MPR as either a "classical music" station in that it may primarily broadcast KSJN, a "news" station in that it may primarily broadcast KNOW, or a "contemporary music/news" station in that it may primarily broadcast KCMP.

MPR currently operates two translator stations in Ely: K208CR (rebroadcasting KSJN) and W269AC (rebroadcasting KNOW).

There are currently 163 active members in Ely who make financial contributions to MPR.

MPR therefore requests a waiver of Section 73.1125 of the Commission's Rules to permit MPR to operate this proposed new station as a satellite station without a main studio in the community of license. As demonstrated below, grant of the instant waiver request would be in the public interest.

The Commission has issued decisions stating that the "main studio must, at a minimum, maintain full-time managerial and full-time staff personnel." Jones Eastern of the Outer Banks, Inc., FCC 91-175, released June 19, 1991, at ¶ 9; see also Salem Broadcasting, Inc., DA 91-804, released July 2, 1991.

Grant of this requested waiver is necessary to permit MPR to operate this proposed new station as a satellite station because the local community cannot otherwise support it as a wholly independent noncommercial educational station. The population of Ely is only about 3700 (2000 Census). Because of this area's limited economic base, it is highly unlikely that a station with separate staff and studio could provide the same high-quality public radio service that MPR

**FCC Form 340**  
**Exhibit 13**  
**Minnesota Public Radio, FRN 0002-6425-10**  
**Re: New station on Channel 207 in Ely, MN**  
**Page 2**

proposes. Therefore, waiver of Section 73.1125 is necessary in this case to ensure that the residents of the area receive the diverse and important programming MPR will provide.

The Commission has recognized the advantages accruing to noncommercial broadcasters from 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, June 16, 2000 (attached hereto).

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

- MPR maintains a toll-free telephone line and an email address by which the residents of the Ely area can reach MPR management to express concerns about the station operations. The toll-free telephone number goes directly to MPR's Member Benefits Department, as do e-mails the public sends to MPR. MPR currently has two live phone lines and three full-time employees who answer the phones and e-mails. In the past year, Member Benefits has handled about 30,000 incoming calls and 35,000 e-mail messages on every subject you can think of related to MPR, including many comments and questions about programming on all three of its services. 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, a classical music director and a director for contemporary music/news who all report to this person. Listener comments from Member Benefits also go to this person, who then distributes comments concerning the various services to their respective directors. Summaries of comments about all three services are widely distributed throughout the company and to the Board of Trustees. 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 ([www.mpr.org](http://www.mpr.org)) that enables local residents to receive extensive information regarding MPR's programming and provides a

**FCC Form 340**

**Exhibit 13**

**Minnesota Public Radio, FRN 0002-6425-10**

**Re: New station on Channel 207 in Ely, MN**

**Page 3**

link for local residents to e-mail concerns about the station operations to MPR management. The site contains descriptions of special reports, schedules for all MPR programming, and online audio sources (live, and in some cases archived) for MPR programming. MPR has established homepages on the MPR Web site for its network stations. Also, the public inspection file for each MPR station is available on the MPR Web site. When the proposed station is constructed, MPR will add its information to the Web site.

- 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 Duluth 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 serves 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 multistate network. In addition, MPR broadcasts news reports on its classical music service and on its contemporary music service.
- MPR has a reporter who subscribes to local and area publications and will maintain ongoing relationships with community residents and leaders, who would be contacted on a regular basis. The reporter will use information provided by these publications and contacts to investigate events and to file news stories of interest in Ely for broadcast by MPR, either regionally or throughout the MPR multi-station network.
- MPR promotes interaction between its management and local community leaders through several advisory boards, including an Institutional Sponsor Council ("ISC"). The ISC is a unique partnership between MPR's stations and colleges and universities throughout their listening areas. This venue enhances MPR's community representation and provides another forum for persons affiliated with the ISC members to discuss public affairs, programming, development, marketing and technology with MPR.
- Another way that MPR promotes interaction between its management and local community leaders is through six advisory boards and, as required by the Corporation for Public Broadcasting ("CPB"). Called Regional Development Advisory Councils ("RDACs"), these groups are managed by MPR station managers currently located in Rochester (southeastern Minnesota), Duluth (northeastern Minnesota), Bemidji (north central Minnesota) and the Twin Cities of Minneapolis and Saint Paul. The RDACs provide input to management on programming, which MPR thoughtfully considers when making program decisions for its stations, including Ely. It is MPR policy that residents of each of its service areas, including the Ely area, participate on an RDAC. RDACs currently meet twice a year and summaries of those meetings are supplied to MPR's Board of Trustees. In the past year, most of MPR's vice presidents and management have attended an RDAC meeting. Members of the RDACs



**FCC Form 340**

**Exhibit 13**

**Minnesota Public Radio, FRN 0002-6425-10**

**Re: New station on Channel 207 in Ely, MN**

**Page 4**

serve for a term of office. MPR's RDACs are in full compliance with CPB requirements for this type of advisory council.

The Commission has relied substantially on similar representations by MPR in finding that waivers of the main studio rule for other stations serve the public interest. Thus, the Commission has held that where MPR has pledged to (1) continue its policy for local residents to serve on an RDAC; (2) continue the relationship with the local community through membership; (3) solicit comments from residents regarding station operation and programming; (4) assign a reporter (who would be based in another community within the same region) who will produce and broadcast local inserts of interest to Ely residents, and will subscribe to local publications and maintain periodic contact with local residents and leaders, who will periodically contact and update the reporter concerning matters of local interest; (5) maintain a local toll-free telephone number for residents of Ely to contact MPR management in accordance with 47 C.F.R. § 73.1125(c); and (6) operate a site on the World Wide Web that enables local residents to receive extensive information and comment on MPR's programming, a waiver is warranted. See attached Letter dated June 16, 2000 from Linda Blair, Chief, Audio Services Division, Mass Media Bureau, to Todd M Stansbury, waiving the main studio rule for a new FM station at Grand Marais, MN, FCC file no. BPED-19981208MI. MPR is making the same pledges with respect to the Ely station.

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

Prepared by Mitzi T Gramling, Associate General Counsel  
October 2007

WMLS

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D. C. 20554

JUN 16 2000

IN REPLY REFER TO:  
1800B3-ALM

Todd M. Stansbury, Esquire  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D. C. 20006

In Re: NEW (Ed. FM), Grand Marais, MN  
Minnesota Public Radio  
Facility ID No. 92306  
File No. BPED-19981208MI

Dear Mr. Stansbury:

The staff has under consideration the application of Minnesota Public Radio ("MPR") for a new noncommercial educational FM station in Grand Marais, Minnesota. The application requests a waiver of the Commission's main studio requirement, *see* 47 C.F.R. § 73.1125, in order to operate the proposed Grand Marais station as a satellite of its commonly owned NCE station KSJN(FM), Minneapolis, Minnesota.<sup>1</sup> For the reasons set forth below, we shall grant MPR's application and its request for waiver.

Section 73.1125(a) requires each broadcast station to maintain a main studio within the station's principal community contour to ensure that the station will serve the needs and interests of the residents of its community of license. *Amendment of Sections 73.1125 and 73.1130*, 3 FCC Rcd 5024, 5027 (1988). However, under Section 73.1125(a)(4), the Commission will waive this requirement where "good cause" exists to do so and where the proposed studio location "would be consistent with the operation of the station in the public interest." Each waiver request by an NCE station seeking to operate as the satellite of another NCE station is considered on a case-by-case basis. The Commission has recognized the benefits of centralized operations for NCE stations, given their limited funding, and thus found "good cause" exists to waive the main studio location requirement where satellite operations are proposed. *Id.* A satellite station must, however, demonstrate that it will meet its local service obligation to satisfy the Section 73.1125 "public interest" standard. *Id.*

MPR's request is based on the economies of scale that would be realized by grant of its waiver. We agree and conclude that there is "good cause" to waive 47 C.F.R.

<sup>1</sup> A "satellite" station meets all of the Commission's technical rules, however, it originates no programming and instead rebroadcasts the parent station's programming. *See Amendment of Multiple Ownership Rules, Memorandum Opinion and Order*, 3 RR2d 1554, 1562 (1964).

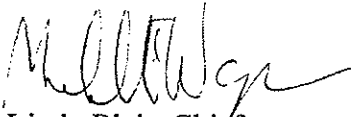
§ 73.1125(a)(4) in these circumstances.

MPR proposes to operate the proposed Grand Marais, Minnesota station, as a satellite of KSJN(FM), Minneapolis, Minnesota, approximately 220 miles from Grand Marais. Where there is a great distance between parent and satellite stations, as here, we are particularly concerned that the licensee take adequate measures to maintain its awareness of the satellite community's needs and interests. To that end, MPR has pledged to: (1) continue its policy that residents of each service area participate on a regional advisory council which provides input to management on programming issues of interest to the residents throughout MPR's service area, including Grand Marais; (2) continue its existing relationship with the community of Grand Marais which has been established by means of membership in MPR; (3) solicit comments from MPR members in Grand Marais concerning programming and station operation; (4) assign to Grand Marais a local news reporter currently based in Duluth, Minnesota who will produce and broadcast local inserts of interest to Grand Marais and who will subscribe to local and area publications and maintain ongoing relationships with community residents and leaders, who will periodically contact and update the reporter concerning matters of local interest; (5) maintain a toll-free telephone number for residents of Grand Marais to contact MPR management in accordance with 47 C.F.R. § 73.1125(c); and (6) operate a site on the World Wide Web, which enables local residents to receive extensive information and comment on MPR's programming.

In these circumstances, we are persuaded that MPR will meet its local service obligations and thus, that grant of the requested waiver is consistent with the public interest. We remind MPR, however, of the requirement that it maintain a public file for the Grand Marais station at the main studio of the "parent" station KSJN(FM). *See Review of the Commission's Rules Regarding the Main Studio and Local Public Inspection Files of Broadcast Television and Radio Stations*, 64 Fed. Reg. 35941 (July 2, 1999). We further remind MPR that notwithstanding the grant of the waiver requested here, the public file for the Grand Marais station must contain the quarterly issues and programs list required by 47 C.F.R. § 73.3527(e)(8).

Accordingly, the application of Minnesota Public Radio for a new noncommercial, educational FM station at Grand Marais, Minnesota (BPED-19981208MI), being in all respects acceptable, and its request for waiver of 47 C.F.R. § 73.1125 ARE HEREBY GRANTED.

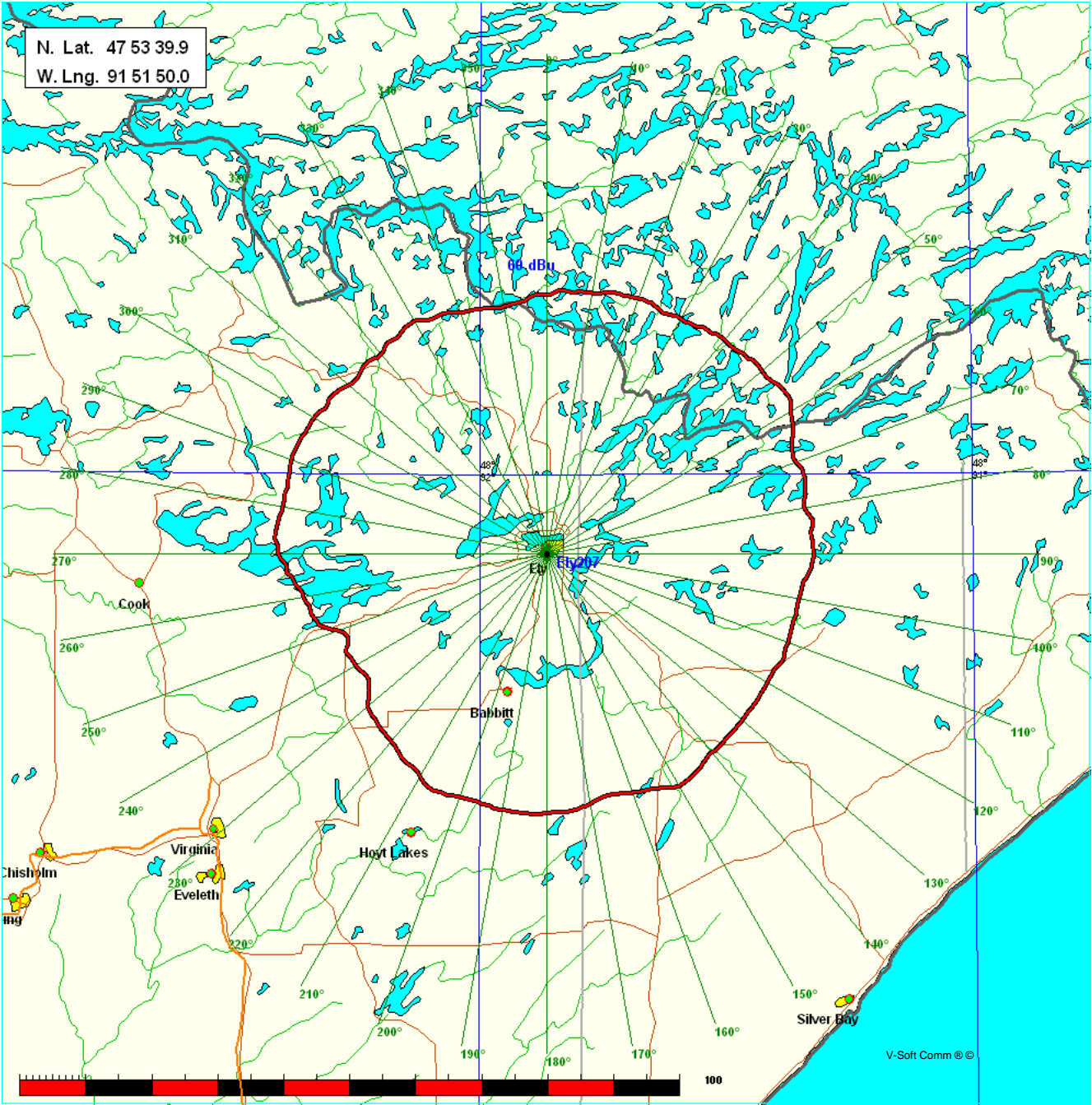
Sincerely,

  
① Linda Blair, Chief  
Audio Services Division  
Mass Media Bureau

Minnesota Public Radio  
Ely 207 60 dBu Coverage

Coverage Study  
09-17-2007

Ely207 CH207 C3 24.0 kW 540.6M COR  
Prot. = 60 dBu. Population = 10,466



N. Lat. = 475339.9 W. Lng. = 915150.0  
 HAAT and Distance to Contour - FCC Method - USGS 03 SEC  
 Ely 207 - Distance to 60 dBu Contour

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5
000	440.9	99.7	24.0000	13.80	1.000	38.70
010	435.6	105.0	24.0000	13.80	1.000	39.56
020	428.0	112.6	24.0000	13.80	1.000	40.68
030	428.2	112.4	24.0000	13.80	1.000	40.66
040	419.7	120.9	24.0000	13.80	1.000	41.81
050	413.6	127.0	24.0000	13.80	1.000	42.59
060	412.0	128.6	24.0000	13.80	1.000	42.80
070	432.1	108.5	24.0000	13.80	1.000	40.10
080	435.6	105.0	24.0000	13.80	1.000	39.56
090	429.6	111.0	24.0000	13.80	1.000	40.46
100	440.8	99.8	24.0000	13.80	1.000	38.73
110	440.3	100.3	24.0000	13.80	1.000	38.81
120	441.9	98.7	24.0000	13.80	1.000	38.55
130	441.0	99.6	24.0000	13.80	1.000	38.69
140	440.1	100.5	24.0000	13.80	1.000	38.84
150	432.1	108.5	24.0000	13.80	1.000	40.09
160	444.6	96.0	24.0000	13.80	1.000	38.08
170	445.3	95.3	24.0000	13.80	1.000	37.96
180	440.3	100.3	24.0000	13.80	1.000	38.81
190	439.8	100.8	24.0000	13.80	1.000	38.88
200	441.1	99.5	24.0000	13.80	1.000	38.68
210	442.6	98.0	24.0000	13.80	1.000	38.43
220	453.0	87.6	24.0000	13.80	1.000	36.57
230	458.5	82.1	24.0000	13.80	1.000	35.50
240	468.4	72.2	24.0000	13.80	1.000	33.44
250	467.0	73.6	24.0000	13.80	1.000	33.75
260	448.0	92.6	24.0000	13.80	1.000	37.48
270	428.3	112.3	24.0000	13.80	1.000	40.65
280	428.2	112.4	24.0000	13.80	1.000	40.66
290	423.8	116.8	24.0000	13.80	1.000	41.27
300	427.8	112.8	24.0000	13.80	1.000	40.72
310	437.8	102.8	24.0000	13.80	1.000	39.21
320	439.5	101.1	24.0000	13.80	1.000	38.94
330	431.4	109.2	24.0000	13.80	1.000	40.20
340	442.5	98.1	24.0000	13.80	1.000	38.43
350	447.7	92.9	24.0000	13.80	1.000	37.53

Ave El= 437.96 M HAAT= 102.64 M AMSL= 540.6

Minnesota Public Radio

Ely 207

REFERENCE  
47 53 39.9 N.  
91 51 50.0 W.

CH# 207C3 - 89.3 MHz, Pwr= 24 kW, HAAT= 102.6 M, COR= 540.6 M  
Average Protected F(50-50)= 39.18 km

DISPLAY DATES  
DATA 09-15-07  
SEARCH 09-17-07

CH CITY	CALL	TYPE STATE	ANT	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT (M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
06+2C Superior	KBJRTV	LI_WI	_HY	188.8 8.6	124.33 BLCT20000517AEX	46 47 21.0 92 06 51.0	100.000 302	604	93.1 Kbjr License, Inc.	121.4R	3.0M
207B Thunder Bay	CBON20	OPE_ON	_CN	68.6 250.5	209.27	48 33 02.0 89 13 25.0	27.500 173	137.2 557	56.7	20.07	5.88
206B Fort Frances	CKSB9F	OPE_ON	_CN	301.8 120.4	160.79	48 38 22.0 93 43 14.0	50.000 142	87.5 496	64.5	20.88	14.81
208C1 Duluth	WJRF	APP_MN	DVX	189.0 8.8	124.38 BPED20070906AEZ	46 47 21.0 92 07 09.0	100.000 154	67.1 461	37.2 Refuge Media Group	18.47	27.35
205A Atikokan	AL9798	AL_ON	---	11.4 191.6	94.17	48 43 28.0 91 36 38.0	6.000 100	3.2 529	37.8	39.33	36.70
208C3 Duluth	WJRF	LIC_MN	_VX	189.0 8.8	124.38 BMLD20050204ABB	46 47 21.0 92 07 09.0	2.850 156	24.3 463	16.4 Refuge Media Group	61.17	48.16
209C3 Grand Marais	WLSN	LIC_MN	_CX	96.5 277.6	114.49 BLED20020411AAL	47 46 04.0 90 20 47.0	6.000 194	2.2 537	21.5 Minnesota Public Radio	73.25	88.94
204C3 Grand Marais	WMLS	LIC_MN	_CX	96.5 277.6	114.49 BLED20020411AAK	47 46 04.0 90 20 47.0	6.000 194	2.2 537	21.5 Minnesota Public Radio	73.25	88.94
207C1 Sebeká	KOPJ	LIC_MN	_C_	235.7 53.6	258.50 BLED20051005AAI	46 33 08.0 94 39 03.0	100.000 143	149.7 560	54.2 Li fetal k Radio, Inc.	75.94	97.14
260C1 Virgí nía	WUSZ	LIC_MN	NCX	236.5 55.6	104.01 BLH20051102AAS	47 22 24.0 93 00 48.0	100.000 162	0.0 596	0.0 Midwest Communications, In	23.5R	80.5M
209A International Falls	AP7622	APP_MN	_CX	301.1 120.0	126.82 BNPED20000119ABW	48 28 24.0 93 20 00.0	6.000 47	1.9 397	18.5 Minnesota Public Radio	84.29	104.06
204A Esko	970331MA	CP_MN	_VN	196.1 15.7	137.38 BPED19970331MA	46 42 22.0 92 21 44.0	0.450 29	1.5 372	8.3 Lincoln High School Esko,	97.29	125.12
210C2 Brulé	WHSÁ	LIC_WI	_CN	171.8 352.0	160.36 BLED1040	46 27 59.0 91 33 56.0	38.000 168	6.4 525	55.2 State Of Wisconsin - Educa	115.70	101.24
208B Kenora	AL4968	AL_ON	---	318.1 136.2	284.57	49 46 06.0 94 30 16.0	50.000 150	88.8 487	65.8	144.63	138.59
208B Kenora	R---	ADD_ON	---	318.8 136.9	283.08	49 46 45.0 94 27 25.0	50.000 150	86.4 490	63.5	145.76	139.64
205C1 Reserve	WOJB	LIC_WI	_CN	169.9 350.3	228.33 BLED19820428AH	45 52 16.0 91 20 56.0	100.000 184	7.8 595	62.1 Lac Courte Oreilles Ojibwa	182.54	162.32
260B Thunder Bay	AL4760	ON	---	67.9 249.7	192.35	48 31 06.0 89 26 59.0	50.000 150	0.0 531	0.0 23.5R	168.8M	

Terrain database is USGS 03 SEC

ERP and HAAT are on direct line to and from reference station.

Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, \_= Omni), Polarization (C,H,V,E), Beam tilt(Y,N,X)

"<" = Station meets FCC minimum distance spacing for its class.

Reference station has protected zone issue: Canada- AM tower

## HOW TO READ THE FM COMPUTER PRINT-OUT

The computer printout should be self-explanatory for the most part. The parameters of the station being checked, (reference station) are printed in the heading. The 60 dBu protected contour is predicted from the Commission's F(50-50) table, while the 40, 54, 80 and 100 dBu contours are interference contours derived from the Commission's F(50-10) table. Contour distances are in kilometers and are predicted using spline interpolation from data points identical to those published in Report No. RS 76-01 by Gary C. Kalagian. Critical contour distances are determined using the Commission's TVFMINT FORTRAN subroutine. When interference contour distances are less than 16 kilometers the F(50-50) tables are used. If signal contour distances are less than 1.6 km the free-space equation is used.

The column listed "**\* IN \***" is the sum of the reference station's 60 dBu protected contour and the data file station's interference contour subtracted from the distance between the stations. (All distances are derived by the method detailed in Sec. 73.208 of the Rules and Regulations as amended in Docket 80-90.) Therefore, the column is a measure of incoming interference. Negative distances in this column indicate the presence of interference. Listed antenna heights are the average heights of eight standard radials as found in the Commission's records unless otherwise noted, in which case the specific antenna heights and the DA power, if applicable, along the straight line azimuths between the reference station and the database station are used and visa versa. The column labeled "**\* OUT \***" shows the distance in kilometers of overlap or clearance between the reference station's interference contour and the database station's protected contour. Negative distance figures in this column indicate outgoing overlap interference.

Under the "AZIMUTH" column, the first row of numbers indicate the bearings from True North of the data base stations in relationship with the reference station, while the numbers in the second row indicate the reverse bearings from the database station to the reference station.

The columns labeled "INT" and "PRO" hold the distance in kilometers of the appropriate interference contour and the protected contour of a data base station.

For I.F. relationships the "IN" and "OUT" columns change their significance. The letter "R" stands for the minimum **required** distance in kilometers, while the letter "M" in the next column follows the **available clear space** separation in kilometers. Minimum separation distances when displayed are taken from Sec 73.207 of the rules as amended. Canadian and Mexican separation distances, U/D ratios and protected contour values are from the US/Mexican Working Agreement and the US/Canada Working Agreement".

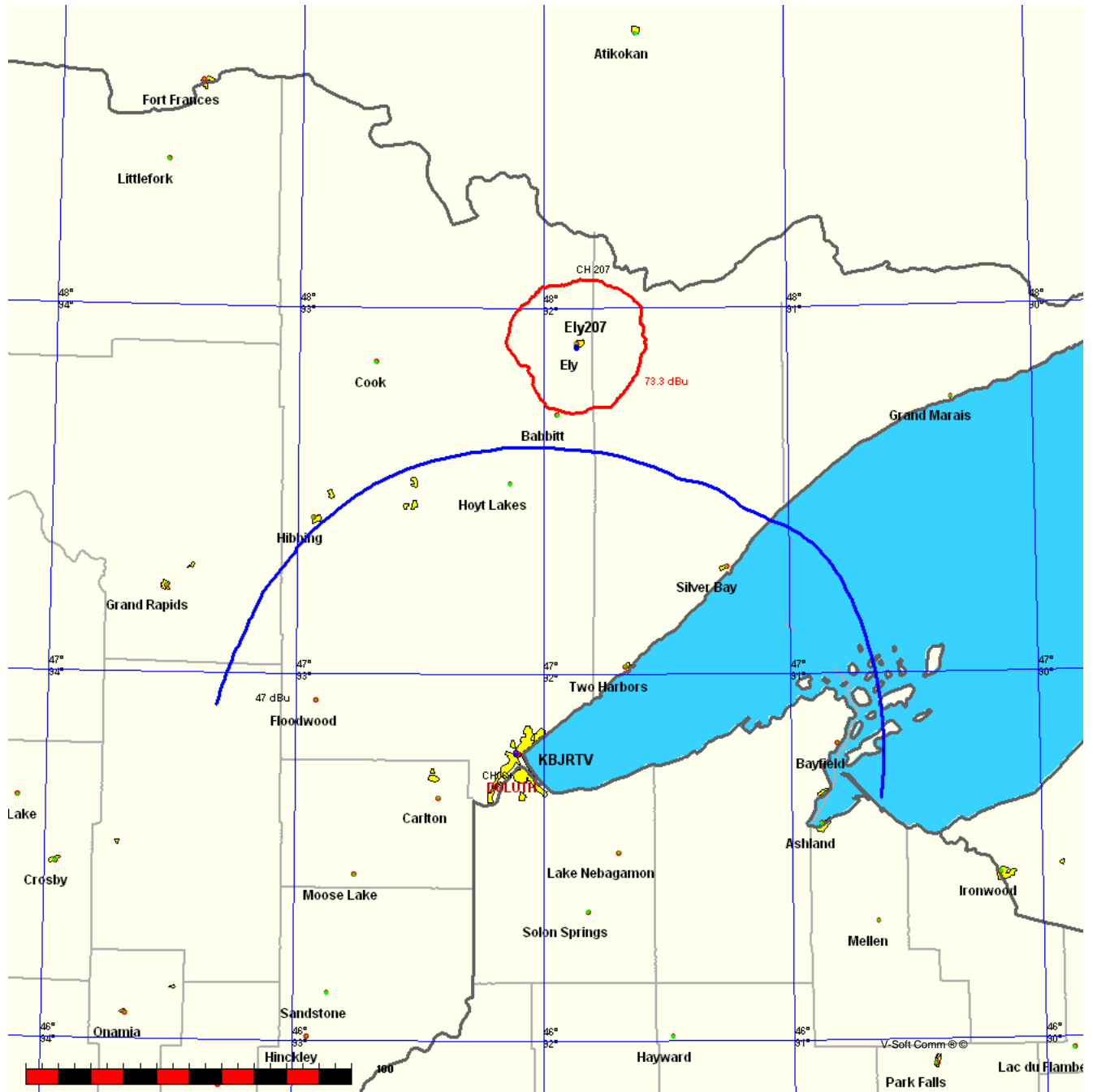
The first three letters of the "TYPE" column identify the current FCC status of the stations. The fourth letter will be a "D" if the facility is directional. "Z" indicates a 73.215 directional. An "N" indicates it is a 73.215 station that operates omni. The fifth letter will be an E, H or V depending on the type of antenna polarization. The sixth letter will be a "Y" if the antenna uses beam tilt or an "X" if the commission is not sure, otherwise it will be an "N".

Minnesota Public Radio  
Ely 207 v. KBJR-TV

FMCommander Single Allocation Study  
09-17-2007

Ely207 CH 207 C3  
24.6 kW 540.6 M COR  
Intef. = 73.3 dBu

KBJRTV CH 06+ 2C BLCT20000517AEX  
100.0 kW, 603.8 M COR  
Prot. = 47 dBu





09-17-2007 USGS 03 SEC Terrain Data

KBJRTV BLCT20000517AEX  
 Channel = 06+2C  
 Max ERP = 100 kW  
 RCAMSL = 603.8 M  
 N. Lat. 46 47 21.0  
 W. Lng. 92 06 51.0  
 Protected  
 47 dBu

Ely207  
 Channel = 207C3  
 Max ERP = 24.6 kW  
 RCAMSL = 540.6 M  
 N. Lat. 47 53 39.9  
 W. Lng. 91 51 50.0  
 Interfering  
 73.3 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
309.0	100.0000	0167.2	090.7	233.8	024.6000	0072.2	110.6	39.56
310.0	100.0000	0167.5	090.7	234.2	024.6000	0071.3	109.4	39.76
311.0	100.0000	0169.0	090.9	234.4	024.6000	0070.6	107.9	40.02
312.0	100.0000	0170.6	091.0	234.7	024.6000	0070.2	106.4	40.29
313.0	100.0000	0173.4	091.4	235.1	024.6000	0069.9	104.9	40.56
314.0	100.0000	0174.3	091.4	235.3	024.6000	0069.7	103.3	40.86
315.0	100.0000	0174.6	091.5	235.4	024.6000	0069.7	101.8	41.17
316.0	100.0000	0174.9	091.5	235.6	024.6000	0069.6	100.2	41.49
317.0	100.0000	0175.1	091.5	235.8	024.6000	0069.6	098.6	41.82
318.0	100.0000	0175.3	091.6	235.9	024.6000	0069.5	097.0	42.16
319.0	100.0000	0175.4	091.6	236.0	024.6000	0069.5	095.5	42.52
320.0	100.0000	0175.5	091.6	236.1	024.6000	0069.5	093.9	42.88
321.0	100.0000	0175.7	091.6	236.2	024.6000	0069.5	092.3	43.26
322.0	100.0000	0175.9	091.6	236.3	024.6000	0069.5	090.7	43.65
323.0	100.0000	0176.1	091.6	236.4	024.6000	0069.5	089.1	44.05
324.0	100.0000	0176.6	091.7	236.4	024.6000	0069.5	087.5	44.46
325.0	100.0000	0177.3	091.8	236.5	024.6000	0069.5	085.9	44.87
326.0	100.0000	0178.3	091.9	236.6	024.6000	0069.5	084.3	45.29
327.0	100.0000	0178.5	091.9	236.6	024.6000	0069.5	082.7	45.70
328.0	100.0000	0178.7	091.9	236.6	024.6000	0069.5	081.1	46.12
329.0	100.0000	0179.2	092.0	236.6	024.6000	0069.5	079.5	46.53
330.0	100.0000	0179.8	092.0	236.6	024.6000	0069.5	077.9	46.94
331.0	100.0000	0180.1	092.1	236.5	024.6000	0069.5	076.3	47.36
332.0	100.0000	0180.5	092.1	236.4	024.6000	0069.5	074.7	47.78
333.0	100.0000	0180.9	092.1	236.3	024.6000	0069.5	073.1	48.20
334.0	100.0000	0181.0	092.2	236.1	024.6000	0069.5	071.5	48.62
335.0	100.0000	0181.0	092.2	235.9	024.6000	0069.5	069.9	49.05
336.0	100.0000	0180.8	092.1	235.7	024.6000	0069.6	068.3	49.47
337.0	100.0000	0180.4	092.1	235.3	024.6000	0069.7	066.7	49.90
338.0	100.0000	0179.9	092.0	235.0	024.6000	0069.9	065.2	50.34
339.0	100.0000	0179.8	092.0	234.6	024.6000	0070.3	063.6	50.80
340.0	100.0000	0179.7	092.0	234.2	024.6000	0071.1	062.1	51.30
341.0	100.0000	0179.6	092.0	233.8	024.6000	0072.4	060.5	51.86
342.0	100.0000	0179.4	092.0	233.3	024.6000	0073.5	059.0	52.44
343.0	100.0000	0179.1	092.0	232.7	024.6000	0074.6	057.5	53.01

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
344.0	100.0000	0178.7	091.9	232.1	024.6000	0075.6	056.0	53.60
345.0	100.0000	0178.0	091.8	231.3	024.6000	0078.0	054.6	54.29
346.0	100.0000	0177.9	091.8	230.6	024.6000	0080.6	053.1	55.03
347.0	100.0000	0177.9	091.8	229.8	024.6000	0082.4	051.7	55.69
348.0	100.0000	0177.4	091.8	228.9	024.6000	0083.3	050.3	56.27
349.0	100.0000	0176.5	091.7	227.9	024.6000	0084.1	049.0	56.81
350.0	100.0000	0176.2	091.6	226.8	024.6000	0084.1	047.6	57.28
351.0	100.0000	0176.6	091.7	225.8	024.6000	0084.5	046.3	57.81
352.0	100.0000	0177.1	091.7	224.6	024.6000	0085.6	045.0	58.40
353.0	100.0000	0177.4	091.8	223.3	024.6000	0086.7	043.7	58.99
354.0	100.0000	0177.6	091.8	222.0	024.6000	0086.8	042.5	59.47
355.0	100.0000	0177.9	091.8	220.5	024.6000	0087.4	041.3	60.00
356.0	100.0000	0179.2	092.0	219.0	024.6000	0088.6	040.1	60.62
357.0	100.0000	0180.9	092.1	217.4	024.6000	0090.8	038.9	61.33
358.0	100.0000	0182.0	092.3	215.7	024.6000	0093.3	037.7	62.04
359.0	100.0000	0182.4	092.3	213.7	024.6000	0094.5	036.8	62.58
000.0	100.0000	0182.4	092.3	211.5	024.6000	0095.3	035.9	63.05
001.0	100.0000	0182.6	092.3	209.3	024.6000	0099.9	035.1	63.84
002.0	100.0000	0183.5	092.4	207.0	024.6000	0103.0	034.3	64.49
003.0	100.0000	0184.7	092.5	204.6	024.6000	0102.7	033.5	64.82
004.0	100.0000	0186.2	092.7	202.0	024.6000	0101.5	032.8	65.04
005.0	100.0000	0187.3	092.8	199.3	024.6000	0099.3	032.2	65.10
006.0	100.0000	0188.0	092.9	196.5	024.6000	0098.7	031.8	65.26
007.0	100.0000	0188.7	093.0	193.6	024.6000	0099.9	031.5	65.52
008.0	100.0000	0189.5	093.0	190.7	024.6000	0100.7	031.3	65.71
009.0	100.0000	0190.3	093.1	187.7	024.6000	0101.0	031.2	65.78
010.0	100.0000	0191.1	093.2	184.7	024.6000	0101.7	031.2	65.84
011.0	100.0000	0192.5	093.3	181.7	024.6000	0101.4	031.3	65.78
012.0	100.0000	0194.8	093.6	178.7	024.6000	0099.9	031.4	65.60
013.0	100.0000	0197.1	093.8	175.8	024.6000	0099.9	031.6	65.49
014.0	100.0000	0199.2	094.0	172.8	024.6000	0097.9	031.9	65.14
015.0	100.0000	0201.6	094.3	170.0	024.6000	0095.3	032.3	64.69
016.0	100.0000	0204.2	094.5	167.2	024.6000	0092.3	032.9	64.15
017.0	100.0000	0206.5	094.7	164.5	024.6000	0092.3	033.5	63.85
018.0	100.0000	0208.5	094.9	162.0	024.6000	0093.4	034.3	63.60
019.0	100.0000	0211.5	095.2	159.6	024.6000	0096.4	035.1	63.53
020.0	100.0000	0213.0	095.4	157.4	024.6000	0097.6	036.0	63.19
021.0	100.0000	0214.1	095.5	155.4	024.6000	0099.7	037.1	62.89
022.0	100.0000	0214.6	095.5	153.6	024.6000	0102.4	038.3	62.60
023.0	100.0000	0215.6	095.6	151.9	024.6000	0105.8	039.5	62.35
024.0	100.0000	0217.6	095.8	150.2	024.6000	0108.3	040.7	62.03
025.0	100.0000	0221.4	096.2	148.5	024.6000	0108.5	041.9	61.54
026.0	100.0000	0224.2	096.5	147.0	024.6000	0107.8	043.2	60.97
027.0	100.0000	0225.2	096.6	145.7	024.6000	0106.7	044.6	60.31
028.0	100.0000	0226.3	096.7	144.6	024.6000	0105.5	046.0	59.65
029.0	100.0000	0227.9	096.8	143.5	024.6000	0104.2	047.5	59.00
030.0	100.0000	0228.6	096.9	142.7	024.6000	0102.6	049.0	58.30
031.0	100.0000	0229.4	097.0	141.9	024.6000	0101.6	050.5	57.64
032.0	100.0000	0233.5	097.4	140.8	024.6000	0100.7	052.0	57.02
033.0	100.0000	0241.7	098.2	139.4	024.6000	0100.8	053.4	56.50
034.0	100.0000	0250.6	099.0	138.0	024.6000	0101.1	054.8	55.98

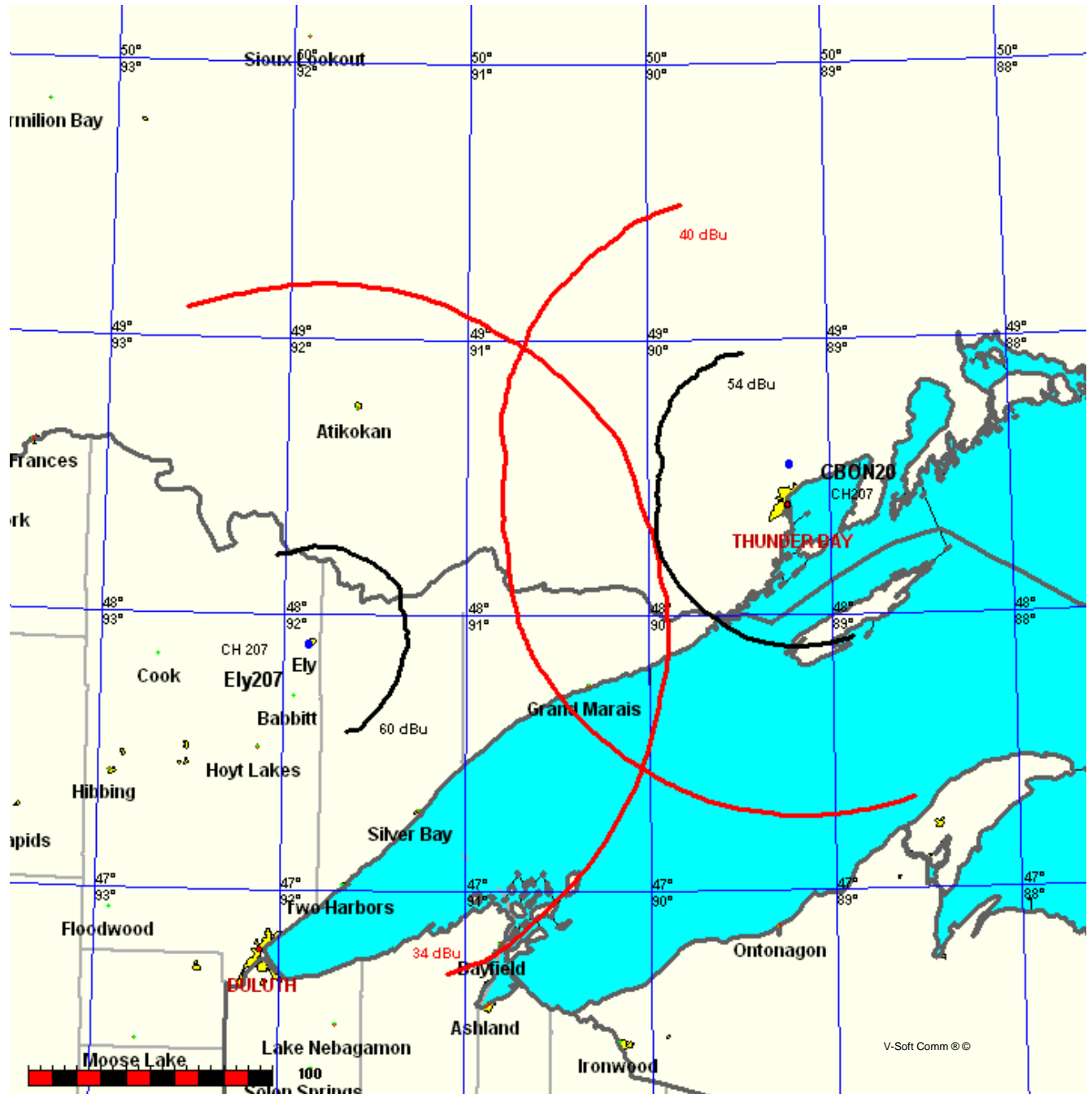
Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
035.0	100.0000	0257.2	099.7	137.0	024.6000	0100.7	056.3	55.37
036.0	100.0000	0262.5	100.2	136.1	024.6000	0100.3	058.0	54.75
037.0	100.0000	0266.8	100.6	135.4	024.6000	0100.1	059.6	54.13
038.0	100.0000	0271.5	101.0	134.8	024.6000	0099.9	061.3	53.53
039.0	100.0000	0275.3	101.4	134.3	024.6000	0099.9	063.0	52.97
040.0	100.0000	0278.6	101.7	133.9	024.6000	0100.0	064.8	52.42
041.0	100.0000	0279.8	101.8	133.7	024.6000	0099.9	066.5	51.88
042.0	100.0000	0280.0	101.8	133.6	024.6000	0099.9	068.3	51.35
043.0	100.0000	0280.0	101.8	133.6	024.6000	0100.0	070.1	50.83
044.0	100.0000	0285.8	102.3	133.1	024.6000	0100.0	071.9	50.30
045.0	100.0000	0294.9	103.1	132.5	024.6000	0100.0	073.7	49.78
046.0	100.0000	0304.1	103.9	132.0	024.6000	0100.0	075.5	49.25
047.0	100.0000	0313.3	104.6	131.6	024.6000	0100.0	077.4	48.72
048.0	100.0000	0324.6	105.5	131.1	024.6000	0099.9	079.3	48.18
049.0	100.0000	0337.7	106.4	130.6	024.6000	0099.8	081.2	47.63
050.0	100.0000	0350.9	107.4	130.1	024.6000	0099.6	083.2	47.06
051.0	100.0000	0363.1	108.3	129.7	024.6000	0099.5	085.2	46.50
052.0	100.0000	0373.7	109.1	129.4	024.6000	0099.4	087.3	45.93
053.0	100.0000	0382.2	109.8	129.2	024.6000	0099.4	089.3	45.38
054.0	100.0000	0389.2	110.4	129.2	024.6000	0099.4	091.3	44.84
055.0	100.0000	0396.7	111.1	129.1	024.6000	0099.4	093.3	44.31
056.0	100.0000	0402.3	111.6	129.1	024.6000	0099.4	095.3	43.80
057.0	100.0000	0405.7	111.9	129.3	024.6000	0099.4	097.3	43.32
058.0	100.0000	0409.0	112.2	129.4	024.6000	0099.4	099.2	42.86
059.0	100.0000	0412.3	112.5	129.6	024.6000	0099.5	101.2	42.42
060.0	100.0000	0414.6	112.7	129.9	024.6000	0099.6	103.1	42.00
061.0	100.0000	0416.1	112.8	130.2	024.6000	0099.7	105.0	41.60
062.0	100.0000	0417.4	112.9	130.5	024.6000	0099.8	106.9	41.21
063.0	100.0000	0418.3	113.0	130.9	024.6000	0099.9	108.7	40.85
064.0	100.0000	0419.0	113.1	131.2	024.6000	0099.9	110.6	40.49
065.0	100.0000	0419.4	113.1	131.6	024.6000	0100.0	112.4	40.15
066.0	100.0000	0419.8	113.1	132.0	024.6000	0100.0	114.3	39.82
067.0	100.0000	0420.0	113.2	132.3	024.6000	0100.0	116.1	39.50
068.0	100.0000	0420.2	113.2	132.7	024.6000	0100.0	117.9	39.18
069.0	100.0000	0420.3	113.2	133.1	024.6000	0100.0	119.7	38.87

Minnesota Public Radio  
Ely 207 v. CBON

FMCommander Single Allocation Study  
09-17-2007

Ely207 CH 207 C3  
24.0 kW 540.6 M COR  
Prot. = 60 dBu  
Intef. = 34 dBu

CBON20 CH 207 B  
27.5 kW, 557.3 M COR  
Prot. = 54 dBu  
Intef. = 40 dBu



Ely207

Channel = 207C3

Max ERP = 24 kW

RCAMSL = 540.6 M

N. Lat. 47 53 39.9

W. Lng. 91 51 50.0

Protected

60 dBu

CBON20

Channel = 207B

Max ERP = 27.5 kW

RCAMSL = 557.35 M

N. Lat. 48 33 02.0

W. Lng. 89 13 25.0

Interfering

40 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
009.0	024.0000	0104.6	039.5	260.8	027.5000	0114.4	192.4	26.71
010.0	024.0000	0105.0	039.6	260.7	027.5000	0114.5	191.7	26.83
011.0	024.0000	0105.8	039.7	260.7	027.5000	0114.5	191.0	26.96
012.0	024.0000	0107.1	039.9	260.6	027.5000	0114.5	190.3	27.09
013.0	024.0000	0108.9	040.1	260.6	027.5000	0114.5	189.5	27.22
014.0	024.0000	0109.5	040.2	260.6	027.5000	0114.6	188.9	27.35
015.0	024.0000	0110.7	040.4	260.5	027.5000	0114.6	188.1	27.47
016.0	024.0000	0111.2	040.5	260.4	027.5000	0114.6	187.5	27.59
017.0	024.0000	0110.4	040.4	260.3	027.5000	0114.5	186.9	27.70
018.0	024.0000	0111.2	040.5	260.2	027.5000	0114.5	186.2	27.82
019.0	024.0000	0111.6	040.5	260.1	027.5000	0114.4	185.6	27.93
020.0	024.0000	0112.6	040.7	260.1	027.5000	0114.4	184.9	28.05
021.0	024.0000	0112.5	040.7	259.9	027.5000	0114.3	184.3	28.16
022.0	024.0000	0113.0	040.8	259.8	027.5000	0114.3	183.7	28.27
023.0	024.0000	0112.8	040.7	259.7	027.5000	0114.3	183.1	28.37
024.0	024.0000	0111.6	040.6	259.5	027.5000	0114.4	182.6	28.46
025.0	024.0000	0109.9	040.3	259.3	027.5000	0114.6	182.2	28.54
026.0	024.0000	0108.3	040.1	259.1	027.5000	0114.9	181.8	28.63
027.0	024.0000	0109.4	040.2	259.0	027.5000	0115.2	181.2	28.75
028.0	024.0000	0111.0	040.5	259.0	027.5000	0115.5	180.5	28.88
029.0	024.0000	0112.6	040.7	258.9	027.5000	0115.8	179.8	29.02
030.0	024.0000	0112.4	040.7	258.7	027.5000	0116.4	179.3	29.13
031.0	024.0000	0111.6	040.6	258.5	027.5000	0117.2	178.8	29.23
032.0	024.0000	0112.4	040.7	258.4	027.5000	0117.9	178.3	29.35
033.0	024.0000	0113.2	040.8	258.2	027.5000	0118.5	177.7	29.48
034.0	024.0000	0114.2	040.9	258.1	027.5000	0119.0	177.1	29.60
035.0	024.0000	0117.0	041.3	258.0	027.5000	0119.3	176.3	29.75
036.0	024.0000	0117.7	041.4	257.9	027.5000	0119.7	175.8	29.86
037.0	024.0000	0118.3	041.5	257.7	027.5000	0120.1	175.3	29.96
038.0	024.0000	0120.0	041.7	257.5	027.5000	0120.4	174.6	30.08
039.0	024.0000	0121.1	041.8	257.4	027.5000	0120.7	174.1	30.19
040.0	024.0000	0120.9	041.8	257.2	027.5000	0121.1	173.7	30.28
041.0	024.0000	0120.6	041.8	257.0	027.5000	0121.6	173.3	30.36
042.0	024.0000	0120.3	041.7	256.8	027.5000	0122.0	172.9	30.44
043.0	024.0000	0121.3	041.9	256.6	027.5000	0122.3	172.4	30.54
044.0	024.0000	0123.5	042.1	256.4	027.5000	0122.5	171.8	30.66
045.0	024.0000	0124.5	042.3	256.2	027.5000	0122.6	171.3	30.75

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
046.0	024.0000	0123.9	042.2	256.0	027.5000	0122.6	171.0	30.80
047.0	024.0000	0126.6	042.5	255.8	027.5000	0122.6	170.3	30.92
048.0	024.0000	0127.4	042.6	255.6	027.5000	0122.5	169.9	30.99
049.0	024.0000	0127.3	042.6	255.4	027.5000	0122.5	169.6	31.05
050.0	024.0000	0127.0	042.6	255.2	027.5000	0122.4	169.3	31.09
051.0	024.0000	0127.1	042.6	254.9	027.5000	0122.3	169.0	31.14
052.0	024.0000	0126.7	042.6	254.7	027.5000	0122.1	168.8	31.18
053.0	024.0000	0129.4	042.9	254.5	027.5000	0121.9	168.2	31.28
054.0	024.0000	0131.1	043.1	254.3	027.5000	0121.7	167.8	31.36
055.0	024.0000	0132.7	043.3	254.1	027.5000	0121.8	167.3	31.44
056.0	024.0000	0133.3	043.4	253.8	027.5000	0122.3	167.0	31.51
057.0	024.0000	0133.8	043.5	253.6	027.5000	0123.1	166.8	31.58
058.0	024.0000	0133.8	043.5	253.3	027.5000	0123.8	166.6	31.63
059.0	024.0000	0131.7	043.2	253.0	027.5000	0124.3	166.7	31.63
060.0	024.0000	0128.6	042.8	252.8	027.5000	0124.5	166.9	31.59
061.0	024.0000	0125.9	042.4	252.5	027.5000	0124.8	167.1	31.56
062.0	024.0000	0123.5	042.1	252.2	027.5000	0125.2	167.3	31.54
063.0	024.0000	0121.7	041.9	252.0	027.5000	0125.7	167.4	31.53
064.0	024.0000	0118.9	041.6	251.7	027.5000	0126.5	167.7	31.50
065.0	024.0000	0115.4	041.1	251.4	027.5000	0127.1	168.1	31.45
066.0	024.0000	0113.2	040.8	251.2	027.5000	0127.8	168.4	31.42
067.0	024.0000	0111.2	040.5	250.9	027.5000	0128.8	168.6	31.41
068.0	024.0000	0109.1	040.2	250.7	027.5000	0130.2	168.9	31.39
069.0	024.0000	0108.0	040.0	250.5	027.5000	0131.7	169.1	31.41
070.0	024.0000	0108.5	040.1	250.2	027.5000	0133.1	169.0	31.46
071.0	024.0000	0111.5	040.5	250.0	027.5000	0134.5	168.6	31.57
072.0	024.0000	0112.5	040.7	249.7	027.5000	0135.7	168.5	31.62
073.0	024.0000	0112.7	040.7	249.5	027.5000	0136.6	168.5	31.65
074.0	024.0000	0112.7	040.7	249.2	027.5000	0137.2	168.6	31.65
075.0	024.0000	0112.0	040.6	249.0	027.5000	0137.7	168.8	31.63
076.0	024.0000	0110.9	040.4	248.8	027.5000	0138.0	169.0	31.59
077.0	024.0000	0109.2	040.2	248.6	027.5000	0138.6	169.4	31.54
078.0	024.0000	0107.5	039.9	248.3	027.5000	0139.4	169.8	31.50
079.0	024.0000	0105.6	039.6	248.1	027.5000	0140.2	170.2	31.44
080.0	024.0000	0105.0	039.6	247.9	027.5000	0141.1	170.4	31.42
081.0	024.0000	0106.9	039.8	247.7	027.5000	0142.0	170.3	31.47
082.0	024.0000	0109.6	040.3	247.4	027.5000	0142.8	170.1	31.53
083.0	024.0000	0111.9	040.6	247.1	027.5000	0143.6	170.0	31.57
084.0	024.0000	0111.7	040.6	246.9	027.5000	0144.3	170.3	31.54
085.0	024.0000	0109.5	040.2	246.7	027.5000	0144.9	170.8	31.46
086.0	024.0000	0108.5	040.1	246.5	027.5000	0145.6	171.2	31.41
087.0	024.0000	0109.8	040.3	246.3	027.5000	0146.4	171.3	31.42
088.0	024.0000	0110.9	040.4	246.0	027.5000	0147.4	171.4	31.43
089.0	024.0000	0110.9	040.4	245.8	027.5000	0148.3	171.7	31.40
090.0	024.0000	0111.0	040.5	245.6	027.5000	0149.2	172.0	31.37
091.0	024.0000	0110.6	040.4	245.4	027.5000	0150.0	172.3	31.32
092.0	024.0000	0109.8	040.3	245.2	027.5000	0150.8	172.8	31.26
093.0	024.0000	0108.6	040.1	245.0	027.5000	0151.4	173.3	31.19
094.0	024.0000	0106.8	039.8	244.9	027.5000	0152.0	173.9	31.10
095.0	024.0000	0104.8	039.5	244.8	027.5000	0152.6	174.5	31.00
096.0	024.0000	0102.5	039.2	244.6	027.5000	0153.1	175.2	30.89

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
097.0	024.0000	0101.3	039.0	244.5	027.5000	0153.7	175.7	30.81
098.0	024.0000	0100.8	038.9	244.3	027.5000	0154.4	176.2	30.74
099.0	024.0000	0100.5	038.8	244.1	027.5000	0155.1	176.6	30.68
100.0	024.0000	0099.8	038.7	244.0	027.5000	0155.7	177.1	30.61
101.0	024.0000	0099.9	038.7	243.8	027.5000	0156.5	177.5	30.55
102.0	024.0000	0100.0	038.8	243.6	027.5000	0157.2	177.9	30.50
103.0	024.0000	0100.2	038.8	243.5	027.5000	0157.9	178.3	30.44
104.0	024.0000	0100.1	038.8	243.3	027.5000	0158.6	178.8	30.37
105.0	024.0000	0099.7	038.7	243.2	027.5000	0159.3	179.3	30.30
106.0	024.0000	0099.5	038.7	243.0	027.5000	0159.9	179.8	30.22
107.0	024.0000	0099.5	038.7	242.9	027.5000	0160.5	180.3	30.15
108.0	024.0000	0099.9	038.7	242.7	027.5000	0161.1	180.7	30.08
109.0	024.0000	0100.2	038.8	242.5	027.5000	0161.8	181.2	30.01
110.0	024.0000	0100.3	038.8	242.4	027.5000	0162.4	181.7	29.94
111.0	024.0000	0100.5	038.8	242.3	027.5000	0163.0	182.2	29.86
112.0	024.0000	0101.2	039.0	242.1	027.5000	0163.7	182.7	29.79
113.0	024.0000	0102.3	039.1	241.9	027.5000	0164.4	183.1	29.73
114.0	024.0000	0102.3	039.1	241.8	027.5000	0165.0	183.6	29.65
115.0	024.0000	0101.3	039.0	241.7	027.5000	0165.4	184.3	29.53
116.0	024.0000	0099.6	038.7	241.7	027.5000	0165.6	185.0	29.41
117.0	024.0000	0099.0	038.6	241.6	027.5000	0166.1	185.6	29.30
118.0	024.0000	0098.7	038.5	241.5	027.5000	0166.6	186.2	29.20
119.0	024.0000	0098.5	038.5	241.4	027.5000	0167.0	186.8	29.11
120.0	024.0000	0098.7	038.5	241.3	027.5000	0167.6	187.4	29.01
121.0	024.0000	0099.1	038.6	241.1	027.5000	0168.1	188.0	28.92
122.0	024.0000	0099.1	038.6	241.1	027.5000	0168.5	188.6	28.82
123.0	024.0000	0098.9	038.6	241.0	027.5000	0168.9	189.2	28.72
124.0	024.0000	0099.0	038.6	240.9	027.5000	0169.3	189.8	28.61
125.0	024.0000	0099.4	038.7	240.8	027.5000	0169.7	190.4	28.52
126.0	024.0000	0099.5	038.7	240.7	027.5000	0170.1	191.0	28.41
127.0	024.0000	0099.3	038.6	240.6	027.5000	0170.4	191.6	28.30
128.0	024.0000	0099.2	038.6	240.6	027.5000	0170.7	192.3	28.19
129.0	024.0000	0099.4	038.7	240.5	027.5000	0171.1	192.9	28.08

09-17-2007 USGS 03 SEC Terrain Data

CBON20

Channel = 207B  
 Max ERP = 27.5 kW  
 RCAMSL = 557.35 M  
 N. Lat. 48 33 02.0  
 W. Lng. 89 13 25.0  
 Protected  
 54 dBu

Ely207

Channel = 207C3  
 Max ERP = 24 kW  
 RCAMSL = 540.6 M  
 N. Lat. 47 53 39.9  
 W. Lng. 91 51 50.0  
 Interfering  
 34 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
191.0	027.5000	0296.3	073.0	088.7	024.0000	0111.0	183.4	27.62
192.0	027.5000	0294.7	072.9	088.6	024.0000	0111.0	182.3	27.83
193.0	027.5000	0292.6	072.7	088.4	024.0000	0111.0	181.1	28.05
194.0	027.5000	0289.8	072.5	088.3	024.0000	0111.0	179.9	28.26
195.0	027.5000	0287.2	072.3	088.1	024.0000	0111.0	178.7	28.47
196.0	027.5000	0284.6	072.1	087.9	024.0000	0110.9	177.6	28.67
197.0	027.5000	0282.4	071.9	087.7	024.0000	0110.7	176.4	28.88
198.0	027.5000	0280.3	071.7	087.6	024.0000	0110.5	175.3	29.08
199.0	027.5000	0277.8	071.5	087.4	024.0000	0110.3	174.2	29.27
200.0	027.5000	0274.0	071.2	087.1	024.0000	0110.0	173.1	29.45
201.0	027.5000	0270.6	070.9	086.9	024.0000	0109.7	172.1	29.63
202.0	027.5000	0266.5	070.5	086.6	024.0000	0109.4	171.1	29.80
203.0	027.5000	0262.6	070.2	086.3	024.0000	0109.0	170.1	29.97
204.0	027.5000	0259.9	070.0	086.1	024.0000	0108.6	169.1	30.13
205.0	027.5000	0257.8	069.8	085.8	024.0000	0108.3	168.1	30.31
206.0	027.5000	0255.8	069.6	085.6	024.0000	0108.4	167.1	30.49
207.0	027.5000	0253.7	069.4	085.3	024.0000	0108.8	166.1	30.68
208.0	027.5000	0252.2	069.3	085.1	024.0000	0109.3	165.1	30.87
209.0	027.5000	0250.5	069.2	084.8	024.0000	0109.9	164.2	31.06
210.0	027.5000	0248.1	069.0	084.5	024.0000	0110.5	163.3	31.24
211.0	027.5000	0244.7	068.7	084.2	024.0000	0111.2	162.4	31.41
212.0	027.5000	0241.4	068.4	083.9	024.0000	0111.9	161.6	31.58
213.0	027.5000	0239.4	068.2	083.6	024.0000	0112.3	160.8	31.75
214.0	027.5000	0238.1	068.1	083.3	024.0000	0112.2	159.9	31.90
215.0	027.5000	0236.5	068.0	083.0	024.0000	0111.8	159.1	32.03
216.0	027.5000	0235.0	067.9	082.7	024.0000	0111.4	158.3	32.16
217.0	027.5000	0233.3	067.7	082.3	024.0000	0110.8	157.5	32.27
218.0	027.5000	0231.6	067.6	082.0	024.0000	0109.5	156.7	32.36
219.0	027.5000	0229.9	067.4	081.6	024.0000	0108.3	156.0	32.44
220.0	027.5000	0227.8	067.2	081.3	024.0000	0107.4	155.3	32.53
221.0	027.5000	0225.7	067.1	080.9	024.0000	0106.7	154.7	32.61
222.0	027.5000	0223.4	066.9	080.5	024.0000	0105.8	154.1	32.69
223.0	027.5000	0221.3	066.7	080.1	024.0000	0105.1	153.5	32.77
224.0	027.5000	0218.9	066.4	079.8	024.0000	0105.0	152.9	32.85



Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
225.0	027.5000	0216.1	066.2	079.3	024.0000	0105.2	152.5	32.94
226.0	027.5000	0213.2	065.9	078.9	024.0000	0105.7	152.0	33.02
227.0	027.5000	0210.4	065.7	078.5	024.0000	0106.3	151.6	33.11
228.0	027.5000	0208.0	065.4	078.1	024.0000	0107.3	151.2	33.21
229.0	027.5000	0206.0	065.2	077.7	024.0000	0108.0	150.7	33.30
230.0	027.5000	0204.5	065.1	077.3	024.0000	0108.6	150.3	33.40
231.0	027.5000	0203.1	065.0	076.9	024.0000	0109.4	149.9	33.49
232.0	027.5000	0201.5	064.8	076.5	024.0000	0110.4	149.5	33.58
233.0	027.5000	0198.9	064.6	076.0	024.0000	0110.9	149.2	33.64
234.0	027.5000	0196.0	064.3	075.6	024.0000	0111.3	149.0	33.68
235.0	027.5000	0192.7	064.0	075.1	024.0000	0111.8	148.9	33.72
236.0	027.5000	0189.0	063.6	074.7	024.0000	0112.3	148.8	33.74
237.0	027.5000	0185.5	063.3	074.2	024.0000	0112.6	148.8	33.76
238.0	027.5000	0181.9	062.9	073.8	024.0000	0112.8	148.8	33.77
239.0	027.5000	0178.1	062.6	073.4	024.0000	0112.8	148.8	33.77
240.0	027.5000	0173.7	062.1	072.9	024.0000	0112.7	148.9	33.74
241.0	027.5000	0168.7	061.6	072.4	024.0000	0112.6	149.2	33.69
242.0	027.5000	0164.1	061.1	072.0	024.0000	0112.5	149.5	33.64
243.0	027.5000	0160.0	060.6	071.6	024.0000	0112.3	149.8	33.59
244.0	027.5000	0155.7	060.0	071.1	024.0000	0111.8	150.1	33.52
245.0	027.5000	0151.6	059.5	070.7	024.0000	0110.7	150.5	33.42
246.0	027.5000	0147.6	059.0	070.3	024.0000	0109.5	150.9	33.32
247.0	027.5000	0144.0	058.5	069.9	024.0000	0108.3	151.3	33.22
248.0	027.5000	0140.8	058.1	069.5	024.0000	0107.8	151.7	33.15
249.0	027.5000	0137.7	057.6	069.1	024.0000	0107.9	152.0	33.09
250.0	027.5000	0134.4	057.1	068.7	024.0000	0108.4	152.5	33.03
251.0	027.5000	0128.5	056.3	068.4	024.0000	0108.7	153.3	32.90
252.0	027.5000	0125.6	055.9	068.0	024.0000	0109.1	153.8	32.84
253.0	027.5000	0124.4	055.7	067.6	024.0000	0109.7	154.0	32.82
254.0	027.5000	0121.9	055.3	067.3	024.0000	0110.5	154.4	32.77
255.0	027.5000	0122.4	055.4	066.9	024.0000	0111.4	154.5	32.79
256.0	027.5000	0122.6	055.4	066.6	024.0000	0112.3	154.6	32.80
257.0	027.5000	0121.6	055.3	066.2	024.0000	0112.9	154.8	32.77
258.0	027.5000	0119.3	055.0	065.9	024.0000	0113.4	155.3	32.71
259.0	027.5000	0115.3	054.3	065.6	024.0000	0114.0	156.1	32.60
260.0	027.5000	0114.3	054.2	065.3	024.0000	0114.8	156.5	32.56
261.0	027.5000	0114.1	054.1	064.9	024.0000	0115.6	156.7	32.54
262.0	027.5000	0112.0	053.8	064.6	024.0000	0116.6	157.3	32.48
263.0	027.5000	0110.4	053.5	064.3	024.0000	0117.7	157.8	32.42
264.0	027.5000	0109.8	053.4	064.0	024.0000	0118.9	158.2	32.39
265.0	027.5000	0108.4	053.2	063.7	024.0000	0119.9	158.7	32.33
266.0	027.5000	0105.2	052.6	063.5	024.0000	0120.6	159.6	32.20
267.0	027.5000	0102.3	052.1	063.2	024.0000	0121.2	160.4	32.08
268.0	027.5000	0101.2	051.9	063.0	024.0000	0121.7	160.9	32.00
269.0	027.5000	0100.4	051.8	062.7	024.0000	0122.2	161.4	31.92
270.0	027.5000	0099.3	051.5	062.4	024.0000	0122.7	162.0	31.83
271.0	027.5000	0098.9	051.5	062.2	024.0000	0123.2	162.5	31.76
272.0	027.5000	0100.1	051.7	061.8	024.0000	0123.8	162.7	31.74
273.0	027.5000	0102.7	052.2	061.5	024.0000	0124.5	162.7	31.75
274.0	027.5000	0105.9	052.8	061.1	024.0000	0125.6	162.7	31.79
275.0	027.5000	0109.4	053.4	060.7	024.0000	0126.8	162.7	31.83

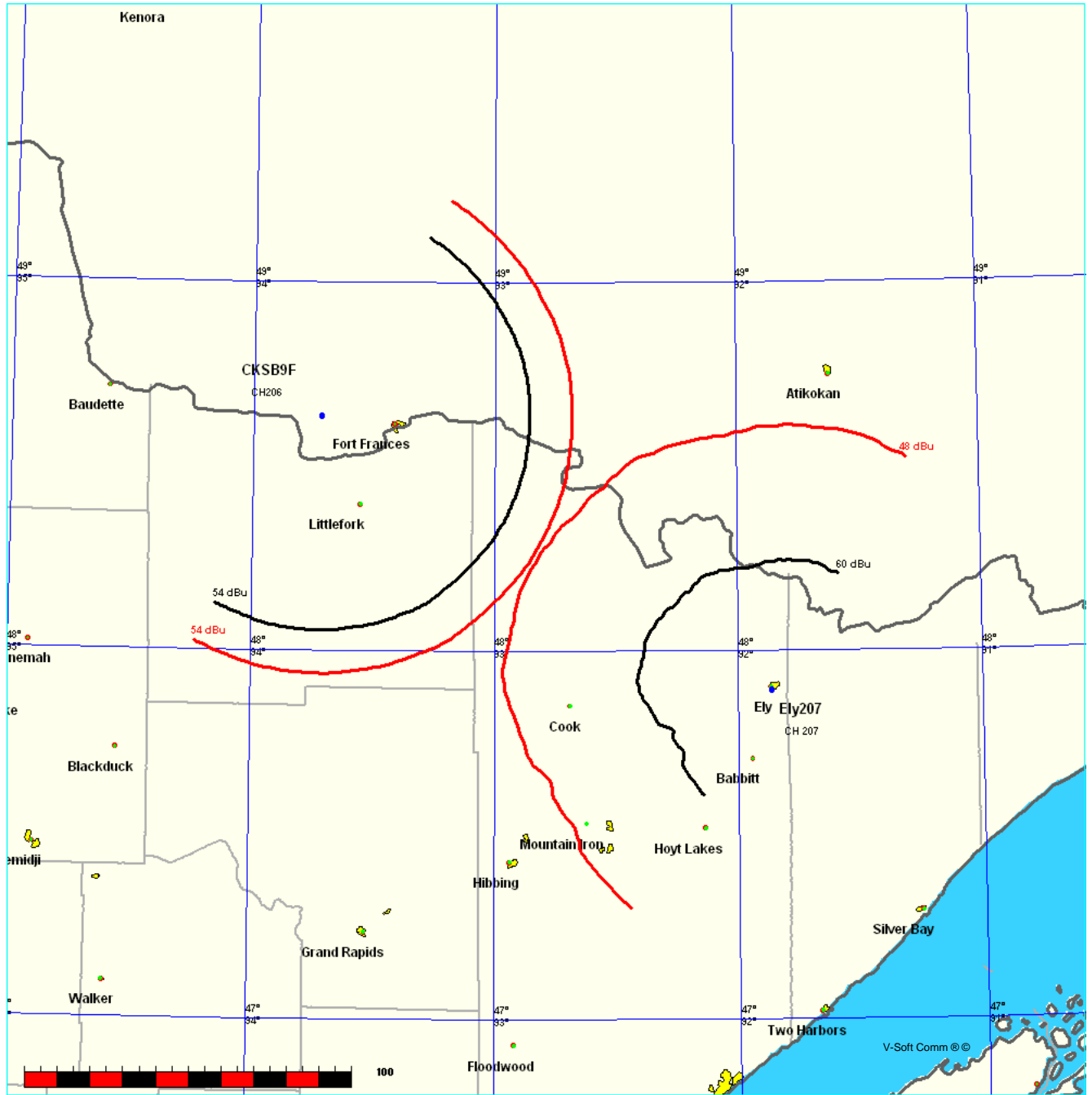
Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
276.0	027.5000	0111.5	053.7	060.4	024.0000	0127.7	162.9	31.82
277.0	027.5000	0113.8	054.1	060.0	024.0000	0128.5	163.1	31.80
278.0	027.5000	0115.9	054.4	059.7	024.0000	0129.5	163.4	31.78
279.0	027.5000	0115.8	054.4	059.4	024.0000	0130.3	164.0	31.69
280.0	027.5000	0115.2	054.3	059.2	024.0000	0131.1	164.6	31.60
281.0	027.5000	0114.7	054.2	058.9	024.0000	0131.9	165.3	31.50
282.0	027.5000	0114.5	054.2	058.7	024.0000	0132.6	165.9	31.41
283.0	027.5000	0114.2	054.2	058.5	024.0000	0133.1	166.6	31.30
284.0	027.5000	0114.5	054.2	058.2	024.0000	0133.6	167.2	31.20
285.0	027.5000	0115.6	054.4	058.0	024.0000	0133.9	167.8	31.11
286.0	027.5000	0116.2	054.5	057.7	024.0000	0134.0	168.4	31.01
287.0	027.5000	0115.9	054.4	057.5	024.0000	0134.0	169.1	30.87
288.0	027.5000	0114.9	054.3	057.3	024.0000	0134.0	169.9	30.73
289.0	027.5000	0114.7	054.3	057.1	024.0000	0133.9	170.6	30.59
290.0	027.5000	0113.6	054.1	057.0	024.0000	0133.8	171.5	30.44
291.0	027.5000	0112.1	053.8	056.8	024.0000	0133.8	172.4	30.28
292.0	027.5000	0110.8	053.6	056.7	024.0000	0133.7	173.2	30.12
293.0	027.5000	0110.1	053.5	056.6	024.0000	0133.7	174.1	29.97
294.0	027.5000	0110.5	053.6	056.4	024.0000	0133.6	174.8	29.84
295.0	027.5000	0112.0	053.8	056.1	024.0000	0133.4	175.4	29.72
296.0	027.5000	0113.5	054.1	055.9	024.0000	0133.3	176.1	29.59
297.0	027.5000	0114.2	054.2	055.7	024.0000	0133.2	176.8	29.45
298.0	027.5000	0114.1	054.2	055.6	024.0000	0133.1	177.7	29.30
299.0	027.5000	0113.5	054.0	055.4	024.0000	0133.0	178.5	29.14
300.0	027.5000	0112.6	053.9	055.3	024.0000	0133.0	179.4	28.98
301.0	027.5000	0112.3	053.9	055.2	024.0000	0132.9	180.3	28.82
302.0	027.5000	0112.1	053.8	055.1	024.0000	0132.8	181.2	28.66
303.0	027.5000	0112.3	053.9	055.0	024.0000	0132.7	182.0	28.51
304.0	027.5000	0112.1	053.8	054.9	024.0000	0132.6	182.9	28.35
305.0	027.5000	0111.1	053.7	054.8	024.0000	0132.5	183.8	28.18
306.0	027.5000	0109.5	053.4	054.8	024.0000	0132.4	184.7	28.00
307.0	027.5000	0107.4	053.0	054.8	024.0000	0132.4	185.7	27.83
308.0	027.5000	0105.2	052.6	054.8	024.0000	0132.5	186.7	27.65
309.0	027.5000	0103.1	052.3	054.8	024.0000	0132.5	187.7	27.47
310.0	027.5000	0102.3	052.1	054.8	024.0000	0132.4	188.6	27.31
311.0	027.5000	0101.2	051.9	054.8	024.0000	0132.4	189.5	27.14

Minnesota Public Radio  
Ely 207 v. CKSB

FMCommander Single Allocation Study  
09-17-2007

Ely207 CH 207 C3  
24.0 kW 540.6 M COR  
Prot. = 60 dBu  
Intef. = 48 dBu

CKSB9F CH 206 B  
50.0 kW, 496 M COR  
Prot. = 54 dBu  
Intef. = 54 dBu



Ely207

Channel = 207C3

Max ERP = 24 kW

RCAMSL = 540.6 M

N. Lat. 47 53 39.9

W. Lng. 91 51 50.0

Protected

60 dBu

CKSB9F

Channel = 206B

Max ERP = 50 kW

RCAMSL = 495.95 M

N. Lat. 48 38 22.0

W. Lng. 93 43 14.0

Interfering

54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
242.0	024.0000	0072.5	033.5	131.8	050.0000	0145.7	146.5	38.23
243.0	024.0000	0073.1	033.6	131.8	050.0000	0145.7	146.0	38.33
244.0	024.0000	0073.6	033.7	131.7	050.0000	0145.7	145.4	38.44
245.0	024.0000	0072.4	033.5	131.6	050.0000	0145.7	144.9	38.52
246.0	024.0000	0070.2	033.0	131.3	050.0000	0145.7	144.6	38.58
247.0	024.0000	0068.5	032.6	131.1	050.0000	0145.7	144.2	38.65
248.0	024.0000	0068.4	032.6	131.0	050.0000	0145.7	143.7	38.74
249.0	024.0000	0070.0	033.0	131.0	050.0000	0145.7	143.0	38.86
250.0	024.0000	0073.6	033.8	131.2	050.0000	0145.7	142.1	39.03
251.0	024.0000	0077.5	034.6	131.3	050.0000	0145.7	141.2	39.21
252.0	024.0000	0081.8	035.4	131.5	050.0000	0145.7	140.3	39.39
253.0	024.0000	0085.1	036.1	131.6	050.0000	0145.7	139.4	39.56
254.0	024.0000	0085.8	036.2	131.6	050.0000	0145.7	138.8	39.68
255.0	024.0000	0088.1	036.7	131.6	050.0000	0145.7	138.0	39.83
256.0	024.0000	0088.9	036.8	131.5	050.0000	0145.7	137.4	39.95
257.0	024.0000	0088.8	036.8	131.3	050.0000	0145.7	136.8	40.06
258.0	024.0000	0089.2	036.9	131.2	050.0000	0145.7	136.3	40.17
259.0	024.0000	0091.2	037.2	131.2	050.0000	0145.7	135.5	40.31
260.0	024.0000	0092.6	037.5	131.1	050.0000	0145.7	134.9	40.45
261.0	024.0000	0092.9	037.5	130.9	050.0000	0145.7	134.3	40.56
262.0	024.0000	0094.5	037.8	130.8	050.0000	0145.7	133.6	40.69
263.0	024.0000	0097.0	038.3	130.8	050.0000	0145.7	132.8	40.85
264.0	024.0000	0098.9	038.6	130.7	050.0000	0145.7	132.1	40.99
265.0	024.0000	0100.9	038.9	130.6	050.0000	0145.8	131.4	41.13
266.0	024.0000	0105.1	039.6	130.6	050.0000	0145.8	130.4	41.32
267.0	024.0000	0104.6	039.5	130.4	050.0000	0145.9	130.0	41.41
268.0	024.0000	0106.3	039.8	130.2	050.0000	0145.9	129.3	41.54
269.0	024.0000	0110.7	040.4	130.2	050.0000	0145.9	128.4	41.72
270.0	024.0000	0112.3	040.6	130.0	050.0000	0146.0	127.7	41.85
271.0	024.0000	0112.4	040.7	129.8	050.0000	0146.2	127.2	41.94
272.0	024.0000	0114.4	040.9	129.6	050.0000	0146.3	126.6	42.07
273.0	024.0000	0116.8	041.3	129.5	050.0000	0146.4	125.9	42.20
274.0	024.0000	0117.3	041.3	129.2	050.0000	0146.5	125.4	42.30
275.0	024.0000	0116.3	041.2	128.9	050.0000	0146.7	125.1	42.36
276.0	024.0000	0115.3	041.1	128.6	050.0000	0146.9	124.8	42.42
277.0	024.0000	0114.4	040.9	128.3	050.0000	0147.0	124.5	42.48
278.0	024.0000	0114.1	040.9	128.0	050.0000	0147.1	124.2	42.54

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
279.0	024.0000	0113.1	040.8	127.7	050.0000	0147.1	123.9	42.59
280.0	024.0000	0112.4	040.7	127.4	050.0000	0147.2	123.7	42.64
281.0	024.0000	0111.9	040.6	127.1	050.0000	0147.2	123.4	42.69
282.0	024.0000	0112.4	040.7	126.8	050.0000	0147.2	123.0	42.76
283.0	024.0000	0112.5	040.7	126.5	050.0000	0147.2	122.7	42.82
284.0	024.0000	0112.0	040.6	126.2	050.0000	0147.2	122.5	42.86
285.0	024.0000	0112.2	040.6	125.9	050.0000	0147.2	122.2	42.91
286.0	024.0000	0113.5	040.8	125.6	050.0000	0147.1	121.8	42.99
287.0	024.0000	0113.7	040.8	125.3	050.0000	0147.0	121.5	43.04
288.0	024.0000	0114.5	041.0	125.0	050.0000	0146.9	121.1	43.10
289.0	024.0000	0115.7	041.1	124.7	050.0000	0146.7	120.8	43.16
290.0	024.0000	0116.8	041.3	124.4	050.0000	0146.5	120.4	43.22
291.0	024.0000	0116.8	041.3	124.0	050.0000	0146.4	120.2	43.25
292.0	024.0000	0116.3	041.2	123.7	050.0000	0146.3	120.1	43.27
293.0	024.0000	0115.8	041.1	123.4	050.0000	0146.2	120.1	43.28
294.0	024.0000	0116.1	041.2	123.0	050.0000	0146.2	119.9	43.31
295.0	024.0000	0115.5	041.1	122.7	050.0000	0146.1	119.9	43.31
296.0	024.0000	0114.3	040.9	122.3	050.0000	0146.0	119.9	43.30
297.0	024.0000	0113.5	040.8	122.0	050.0000	0146.0	119.9	43.29
298.0	024.0000	0113.1	040.8	121.6	050.0000	0145.9	119.9	43.29
299.0	024.0000	0113.0	040.7	121.3	050.0000	0145.9	119.9	43.30
300.0	024.0000	0112.8	040.7	121.0	050.0000	0145.9	119.9	43.30
301.0	024.0000	0112.5	040.7	120.6	050.0000	0145.9	119.9	43.29
302.0	024.0000	0110.7	040.4	120.3	050.0000	0145.8	120.2	43.24
303.0	024.0000	0108.3	040.1	120.0	050.0000	0145.7	120.6	43.17
304.0	024.0000	0107.9	040.0	119.6	050.0000	0145.6	120.7	43.15
305.0	024.0000	0109.7	040.3	119.3	050.0000	0145.5	120.4	43.19
306.0	024.0000	0109.0	040.2	119.0	050.0000	0145.4	120.6	43.15
307.0	024.0000	0108.3	040.1	118.6	050.0000	0145.3	120.8	43.11
308.0	024.0000	0107.2	039.9	118.3	050.0000	0145.3	121.1	43.07
309.0	024.0000	0104.6	039.5	118.0	050.0000	0145.2	121.6	42.97
310.0	024.0000	0102.8	039.2	117.7	050.0000	0145.1	122.0	42.89
311.0	024.0000	0101.8	039.0	117.4	050.0000	0145.1	122.3	42.83
312.0	024.0000	0100.9	038.9	117.1	050.0000	0145.0	122.6	42.78
313.0	024.0000	0101.7	039.0	116.8	050.0000	0144.9	122.6	42.76
314.0	024.0000	0103.0	039.3	116.5	050.0000	0144.9	122.6	42.77
315.0	024.0000	0103.8	039.4	116.2	050.0000	0144.8	122.7	42.75
316.0	024.0000	0104.0	039.4	115.8	050.0000	0144.7	122.9	42.71
317.0	024.0000	0104.2	039.4	115.5	050.0000	0144.6	123.1	42.67
318.0	024.0000	0103.6	039.3	115.3	050.0000	0144.5	123.4	42.61
319.0	024.0000	0101.9	039.1	115.0	050.0000	0144.5	123.9	42.51
320.0	024.0000	0101.1	038.9	114.7	050.0000	0144.4	124.3	42.44
321.0	024.0000	0102.7	039.2	114.4	050.0000	0144.3	124.4	42.42
322.0	024.0000	0105.2	039.6	114.0	050.0000	0144.2	124.3	42.43
323.0	024.0000	0106.4	039.8	113.7	050.0000	0144.2	124.5	42.40
324.0	024.0000	0105.2	039.6	113.5	050.0000	0144.2	125.0	42.31
325.0	024.0000	0104.4	039.5	113.2	050.0000	0144.2	125.4	42.22
326.0	024.0000	0106.4	039.8	112.9	050.0000	0144.3	125.5	42.21
327.0	024.0000	0108.4	040.1	112.5	050.0000	0144.3	125.7	42.18
328.0	024.0000	0109.0	040.2	112.3	050.0000	0144.2	126.0	42.13
329.0	024.0000	0109.3	040.2	112.0	050.0000	0144.2	126.3	42.05

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
330.0	024.0000	0109.2	040.2	111.7	050.0000	0144.2	126.8	41.97
331.0	024.0000	0106.9	039.9	111.6	050.0000	0144.2	127.5	41.84
332.0	024.0000	0104.9	039.5	111.4	050.0000	0144.2	128.2	41.71
333.0	024.0000	0103.2	039.3	111.3	050.0000	0144.2	128.8	41.59
334.0	024.0000	0103.1	039.3	111.0	050.0000	0144.2	129.3	41.50
335.0	024.0000	0102.7	039.2	110.8	050.0000	0144.1	129.8	41.40
336.0	024.0000	0103.3	039.3	110.6	050.0000	0144.1	130.2	41.32
337.0	024.0000	0102.4	039.1	110.4	050.0000	0144.1	130.8	41.21
338.0	024.0000	0100.9	038.9	110.3	050.0000	0144.1	131.4	41.08
339.0	024.0000	0099.8	038.7	110.1	050.0000	0144.0	132.1	40.95
340.0	024.0000	0098.1	038.4	110.0	050.0000	0144.0	132.8	40.82
341.0	024.0000	0097.6	038.4	109.9	050.0000	0144.0	133.3	40.71
342.0	024.0000	0097.4	038.3	109.7	050.0000	0144.0	133.9	40.60
343.0	024.0000	0097.0	038.3	109.5	050.0000	0144.0	134.4	40.49
344.0	024.0000	0096.1	038.1	109.4	050.0000	0144.0	135.1	40.36
345.0	024.0000	0095.3	038.0	109.3	050.0000	0144.0	135.7	40.24
346.0	024.0000	0094.7	037.9	109.2	050.0000	0144.0	136.3	40.12
347.0	024.0000	0094.2	037.8	109.1	050.0000	0144.0	136.9	40.00
348.0	024.0000	0093.2	037.6	109.0	050.0000	0144.0	137.5	39.88
349.0	024.0000	0092.2	037.4	108.9	050.0000	0144.0	138.2	39.75
350.0	024.0000	0092.9	037.5	108.7	050.0000	0144.0	138.7	39.65
351.0	024.0000	0093.5	037.6	108.5	050.0000	0144.0	139.2	39.55
352.0	024.0000	0094.2	037.8	108.4	050.0000	0144.0	139.7	39.44
353.0	024.0000	0095.0	037.9	108.2	050.0000	0143.9	140.3	39.34
354.0	024.0000	0095.5	038.0	108.0	050.0000	0143.9	140.8	39.23
355.0	024.0000	0095.8	038.0	107.9	050.0000	0143.9	141.4	39.12
356.0	024.0000	0098.4	038.5	107.6	050.0000	0143.9	141.8	39.04
357.0	024.0000	0099.9	038.7	107.4	050.0000	0143.9	142.4	38.94
358.0	024.0000	0099.9	038.7	107.3	050.0000	0143.9	143.0	38.82
359.0	024.0000	0099.3	038.6	107.3	050.0000	0143.9	143.7	38.70
000.0	024.0000	0099.7	038.7	107.2	050.0000	0143.9	144.3	38.58
001.0	024.0000	0100.3	038.8	107.0	050.0000	0144.0	144.9	38.47
002.0	024.0000	0102.6	039.2	106.8	050.0000	0144.0	145.5	38.37

CKSB9F  
 Channel = 206B  
 Max ERP = 50 kW  
 RCAMSL = 495.95 M  
 N. Lat. 48 38 22.0  
 W. Lng. 93 43 14.0  
 Protected  
 54 dBu

Ely207  
 Channel = 207C3  
 Max ERP = 24 kW  
 RCAMSL = 540.6 M  
 N. Lat. 47 53 39.9  
 W. Lng. 91 51 50.0  
 Interfering  
 48 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
060.0	050.0000	0136.1	063.1	324.5	024.0000	0104.4	141.3	34.86
061.0	050.0000	0136.1	063.1	324.5	024.0000	0104.4	140.1	35.09
062.0	050.0000	0136.2	063.1	324.5	024.0000	0104.5	139.1	35.30
063.0	050.0000	0136.2	063.1	324.4	024.0000	0104.6	138.0	35.52
064.0	050.0000	0136.4	063.1	324.3	024.0000	0104.7	136.9	35.73
065.0	050.0000	0136.9	063.2	324.3	024.0000	0104.8	135.8	35.95
066.0	050.0000	0137.8	063.3	324.2	024.0000	0104.9	134.7	36.17
067.0	050.0000	0138.4	063.4	324.1	024.0000	0105.0	133.6	36.38
068.0	050.0000	0138.9	063.5	324.1	024.0000	0105.1	132.5	36.60
069.0	050.0000	0139.2	063.5	323.9	024.0000	0105.3	131.4	36.81
070.0	050.0000	0139.2	063.5	323.8	024.0000	0105.5	130.4	37.02
071.0	050.0000	0139.3	063.6	323.7	024.0000	0105.6	129.3	37.22
072.0	050.0000	0139.4	063.6	323.5	024.0000	0105.8	128.3	37.43
073.0	050.0000	0139.5	063.6	323.3	024.0000	0106.0	127.2	37.62
074.0	050.0000	0139.7	063.6	323.2	024.0000	0106.2	126.2	37.82
075.0	050.0000	0139.9	063.6	323.0	024.0000	0106.4	125.2	38.01
076.0	050.0000	0140.1	063.7	322.8	024.0000	0106.5	124.1	38.19
077.0	050.0000	0140.3	063.7	322.6	024.0000	0106.5	123.1	38.37
078.0	050.0000	0140.7	063.8	322.4	024.0000	0106.1	122.1	38.54
079.0	050.0000	0140.8	063.8	322.1	024.0000	0105.6	121.1	38.69
080.0	050.0000	0140.7	063.8	321.9	024.0000	0104.9	120.1	38.84
081.0	050.0000	0140.6	063.7	321.6	024.0000	0104.2	119.2	38.98
082.0	050.0000	0140.5	063.7	321.3	024.0000	0103.6	118.2	39.12
083.0	050.0000	0140.5	063.7	321.0	024.0000	0102.8	117.3	39.26
084.0	050.0000	0140.5	063.7	320.7	024.0000	0102.3	116.4	39.41
085.0	050.0000	0140.4	063.7	320.4	024.0000	0101.7	115.5	39.55
086.0	050.0000	0140.5	063.7	320.1	024.0000	0101.2	114.6	39.69
087.0	050.0000	0140.6	063.7	319.8	024.0000	0101.1	113.7	39.85
088.0	050.0000	0140.8	063.8	319.4	024.0000	0101.2	112.8	40.01
089.0	050.0000	0140.8	063.8	319.0	024.0000	0101.8	112.0	40.19
090.0	050.0000	0140.8	063.8	318.7	024.0000	0102.6	111.1	40.37
091.0	050.0000	0140.7	063.8	318.3	024.0000	0103.2	110.3	40.54
092.0	050.0000	0140.6	063.7	317.8	024.0000	0103.7	109.5	40.71
093.0	050.0000	0140.6	063.7	317.4	024.0000	0104.0	108.8	40.87

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
094.0	050.0000	0140.7	063.8	317.0	024.0000	0104.2	108.0	41.03
095.0	050.0000	0140.7	063.8	316.6	024.0000	0104.2	107.3	41.18
096.0	050.0000	0140.6	063.7	316.1	024.0000	0104.0	106.6	41.32
097.0	050.0000	0140.6	063.7	315.6	024.0000	0103.8	105.9	41.45
098.0	050.0000	0140.7	063.8	315.1	024.0000	0103.8	105.2	41.59
099.0	050.0000	0140.9	063.8	314.6	024.0000	0103.7	104.5	41.73
100.0	050.0000	0141.2	063.8	314.2	024.0000	0103.3	103.9	41.86
101.0	050.0000	0141.6	063.9	313.7	024.0000	0102.5	103.2	41.97
102.0	050.0000	0142.1	064.0	313.1	024.0000	0101.9	102.6	42.09
103.0	050.0000	0142.6	064.0	312.6	024.0000	0101.0	102.0	42.19
104.0	050.0000	0143.1	064.1	312.1	024.0000	0100.9	101.4	42.32
105.0	050.0000	0143.6	064.2	311.5	024.0000	0101.3	100.9	42.46
106.0	050.0000	0143.9	064.2	310.9	024.0000	0101.8	100.3	42.59
107.0	050.0000	0144.0	064.2	310.4	024.0000	0102.3	099.9	42.71
108.0	050.0000	0143.9	064.2	309.8	024.0000	0103.2	099.5	42.85
109.0	050.0000	0144.0	064.2	309.2	024.0000	0104.3	099.1	42.98
110.0	050.0000	0144.0	064.2	308.5	024.0000	0105.8	098.7	43.12
111.0	050.0000	0144.2	064.3	307.9	024.0000	0107.4	098.4	43.27
112.0	050.0000	0144.2	064.3	307.3	024.0000	0108.2	098.1	43.37
113.0	050.0000	0144.3	064.3	306.6	024.0000	0108.4	097.8	43.45
114.0	050.0000	0144.2	064.3	306.0	024.0000	0109.0	097.6	43.52
115.0	050.0000	0144.5	064.3	305.3	024.0000	0109.8	097.4	43.61
116.0	050.0000	0144.8	064.3	304.7	024.0000	0109.4	097.2	43.65
117.0	050.0000	0144.9	064.4	304.0	024.0000	0108.0	097.0	43.63
118.0	050.0000	0145.2	064.4	303.4	024.0000	0107.6	096.9	43.65
119.0	050.0000	0145.4	064.4	302.7	024.0000	0109.0	096.8	43.73
120.0	050.0000	0145.7	064.5	302.0	024.0000	0110.6	096.7	43.82
121.0	050.0000	0145.9	064.5	301.4	024.0000	0111.9	096.7	43.88
122.0	050.0000	0146.0	064.5	300.7	024.0000	0112.5	096.7	43.89
123.0	050.0000	0146.2	064.5	300.0	024.0000	0112.8	096.7	43.90
124.0	050.0000	0146.4	064.6	299.4	024.0000	0113.0	096.8	43.89
125.0	050.0000	0146.9	064.6	298.7	024.0000	0113.2	096.8	43.88
126.0	050.0000	0147.2	064.7	298.0	024.0000	0113.2	097.0	43.85
127.0	050.0000	0147.2	064.7	297.4	024.0000	0113.2	097.1	43.81
128.0	050.0000	0147.1	064.7	296.7	024.0000	0113.8	097.4	43.77
129.0	050.0000	0146.7	064.6	296.1	024.0000	0114.2	097.7	43.71
130.0	050.0000	0146.0	064.5	295.5	024.0000	0115.0	098.1	43.64
131.0	050.0000	0145.7	064.5	294.8	024.0000	0115.6	098.4	43.58
132.0	050.0000	0145.7	064.5	294.2	024.0000	0116.1	098.8	43.51
133.0	050.0000	0145.9	064.5	293.6	024.0000	0116.1	099.1	43.43
134.0	050.0000	0146.0	064.5	293.0	024.0000	0115.8	099.5	43.32
135.0	050.0000	0146.1	064.5	292.4	024.0000	0116.0	099.9	43.22
136.0	050.0000	0146.0	064.5	291.8	024.0000	0116.5	100.4	43.13
137.0	050.0000	0146.1	064.5	291.2	024.0000	0116.7	100.9	43.02
138.0	050.0000	0146.5	064.6	290.6	024.0000	0116.9	101.4	42.92
139.0	050.0000	0146.9	064.6	290.1	024.0000	0116.9	101.9	42.80
140.0	050.0000	0147.4	064.7	289.5	024.0000	0116.3	102.4	42.66
141.0	050.0000	0147.7	064.7	289.0	024.0000	0115.7	103.0	42.51
142.0	050.0000	0147.9	064.8	288.4	024.0000	0115.0	103.6	42.34
143.0	050.0000	0148.0	064.8	287.9	024.0000	0114.4	104.2	42.18
144.0	050.0000	0148.2	064.8	287.4	024.0000	0113.8	104.9	42.02



Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
145.0	050.0000	0148.6	064.9	286.9	024.0000	0113.7	105.5	41.87
146.0	050.0000	0149.0	064.9	286.4	024.0000	0113.6	106.2	41.72
147.0	050.0000	0149.8	065.0	285.9	024.0000	0113.4	106.9	41.57
148.0	050.0000	0150.7	065.2	285.4	024.0000	0112.8	107.6	41.41
149.0	050.0000	0151.8	065.3	284.9	024.0000	0112.1	108.3	41.24
150.0	050.0000	0152.5	065.4	284.5	024.0000	0111.7	109.0	41.08
151.0	050.0000	0152.5	065.4	284.1	024.0000	0111.9	109.9	40.92
152.0	050.0000	0152.5	065.4	283.7	024.0000	0112.3	110.7	40.76
153.0	050.0000	0152.0	065.3	283.3	024.0000	0112.4	111.6	40.59
154.0	050.0000	0151.7	065.3	283.0	024.0000	0112.5	112.6	40.42
155.0	050.0000	0151.3	065.2	282.6	024.0000	0112.5	113.5	40.25
156.0	050.0000	0150.8	065.2	282.3	024.0000	0112.5	114.5	40.07
157.0	050.0000	0150.2	065.1	282.1	024.0000	0112.4	115.4	39.89
158.0	050.0000	0149.9	065.0	281.8	024.0000	0112.2	116.4	39.71
159.0	050.0000	0149.8	065.0	281.5	024.0000	0112.1	117.4	39.54
160.0	050.0000	0149.8	065.0	281.2	024.0000	0112.0	118.3	39.37
161.0	050.0000	0149.9	065.0	280.9	024.0000	0111.9	119.3	39.19
162.0	050.0000	0149.9	065.0	280.7	024.0000	0112.0	120.3	39.02
163.0	050.0000	0150.0	065.1	280.4	024.0000	0112.1	121.3	38.85
164.0	050.0000	0150.1	065.1	280.2	024.0000	0112.2	122.4	38.68
165.0	050.0000	0150.1	065.1	280.0	024.0000	0112.4	123.4	38.50
166.0	050.0000	0150.0	065.1	279.7	024.0000	0112.7	124.4	38.32
167.0	050.0000	0150.0	065.1	279.6	024.0000	0112.8	125.5	38.14
168.0	050.0000	0149.8	065.0	279.4	024.0000	0112.9	126.6	37.95
169.0	050.0000	0149.6	065.0	279.2	024.0000	0113.0	127.6	37.76
170.0	050.0000	0149.1	064.9	279.1	024.0000	0113.1	128.7	37.56
171.0	050.0000	0148.6	064.9	279.0	024.0000	0113.1	129.8	37.35
172.0	050.0000	0148.7	064.9	278.8	024.0000	0113.2	130.9	37.15
173.0	050.0000	0148.8	064.9	278.7	024.0000	0113.3	132.0	36.94
174.0	050.0000	0149.1	064.9	278.6	024.0000	0113.5	133.1	36.73
175.0	050.0000	0149.3	065.0	278.4	024.0000	0113.7	134.2	36.52
176.0	050.0000	0149.4	065.0	278.3	024.0000	0113.8	135.3	36.31
177.0	050.0000	0149.7	065.0	278.2	024.0000	0113.9	136.4	36.09
178.0	050.0000	0149.8	065.0	278.2	024.0000	0114.0	137.5	35.87
179.0	050.0000	0149.8	065.0	278.1	024.0000	0114.0	138.6	35.66
180.0	050.0000	0149.8	065.0	278.0	024.0000	0114.0	139.8	35.44

## EXHIBIT #22

### R.F. EMISSION COMPLIANCE STATEMENT

#### Minnesota Public Radio

New Station Application

Ely, MN

October 2007

CH 207C3

24 kW H & V

The proposed six-bay, circularly polarized antenna will be energized such that it produces 24 kW effective radiated power from a center of radiation of 90 meters above ground. Using the formulas expressed in the OET Bulletin, No. 65, August 1997, "Evaluating Compliance with F.C.C. Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields", published by the Federal Communication Commission's Office of Science and Engineering, and then by applying a combination of the element and array pattern as defined in E.P.A. study PB85-245868 ("**Engineering Assessment of the Potential Impact of the Federal Radiation Protection Guidance on the AM, FM and TV Broadcast Services**") the predicted level of RF non-ionization emissions at a position of 2 meters above ground (head-height) at the base of the tower for the proposed 6-bay Shively 6813 (Type #6) antenna is 1.035 microwatts per square centimeter, which is 0.104 percent of the maximum for a controlled area and 0.518 percent of maximum for an uncontrolled area.

Since the predicted level of emissions is less than 1% of maximum, no further calculations were deemed necessary.

The applicant will protect workers on the tower by either reducing ERP or terminating transmission.

Consequently, it appears that the proposed FM station will be in full compliance with the Commission's human exposure to radiofrequency electromagnetic field rules and regulations.