

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0405 (October 2009)	FOR FCC USE ONLY
FCC 349		
APPLICATION FOR AUTHORITY TO CONSTRUCT OR MAKE CHANGES IN AN FM TRANSLATOR OR FM BOOSTER STATION		FOR COMMISSION USE ONLY FILE NO. BPFT - 20150921ABJ
Read INSTRUCTIONS Before Filling Out Form		

Section I - General Information

1.	Legal Name of the Applicant MINNESOTA PUBLIC RADIO								
	Mailing Address 480 CEDAR STREET								
	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">City ST. PAUL</td> <td style="width:30%;">State or Country (if foreign address) MN</td> <td style="width:20%;">ZIP Code 55101 -</td> </tr> </table>	City ST. PAUL	State or Country (if foreign address) MN	ZIP Code 55101 -					
City ST. PAUL	State or Country (if foreign address) MN	ZIP Code 55101 -							
	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">Telephone Number (include area code) 6512901500</td> <td style="width:50%;">E-Mail Address (if available) FCCFILING@MPR.ORG</td> </tr> </table>	Telephone Number (include area code) 6512901500	E-Mail Address (if available) FCCFILING@MPR.ORG						
Telephone Number (include area code) 6512901500	E-Mail Address (if available) FCCFILING@MPR.ORG								
	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;">FCC Registration Number: 0002642510</td> <td style="width:20%;">Call Sign W215CG</td> <td style="width:50%;">Facility Identifier 21082</td> </tr> </table>	FCC Registration Number: 0002642510	Call Sign W215CG	Facility Identifier 21082					
FCC Registration Number: 0002642510	Call Sign W215CG	Facility Identifier 21082							
2.	Contact Representative (if other than Applicant) MELODIE VIRTUE								
	Firm or Company Name GARVEY SCHUBERT BARER								
	Mailing Address 1000 POTOMAC STREET NW, SUITE 200								
	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;">City WASHINGTON</td> <td style="width:30%;">State or Country (if foreign address) DC</td> <td style="width:40%;">ZIP Code 20007 -</td> </tr> </table>	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20007 -					
City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20007 -							
	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">Telephone Number (include area code) 2022982527</td> <td style="width:50%;">E-Mail Address (if available) MVIRTUE@GSBLAW.COM</td> </tr> </table>	Telephone Number (include area code) 2022982527	E-Mail Address (if available) MVIRTUE@GSBLAW.COM						
Telephone Number (include area code) 2022982527	E-Mail Address (if available) MVIRTUE@GSBLAW.COM								
3.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Noncommercial Educational Licensee/Permittee <input type="radio"/> Other <input type="radio"/> N/A (Fee Required)								
4.	Facility information: a. <input checked="" type="radio"/> FM Translator <input type="radio"/> FM Booster b. Community or communities to which the proposed facility will be licensed: <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:50%;">Community(ies)</th> <th style="width:50%;">State</th> </tr> </thead> <tbody> <tr> <td>DULUTH</td> <td>MN</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Community(ies)	State	DULUTH	MN				
Community(ies)	State								
DULUTH	MN								
5.	Application Purpose <input type="radio"/> New station <input type="radio"/> Major Modification of construction permit <input type="radio"/> Major Change in licensed facility <input type="radio"/> Minor Modification of construction permit <input checked="" type="radio"/> Minor Change in licensed facility <input type="radio"/> Major Amendment to pending application <input type="radio"/> Minor Amendment to pending application a. File number of original construction permit: _____ If an amendment, submit as an Exhibit a listing by Section and Question Number the portions of the pending application that are being revised. [Exhibit 1]								

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. See General Instruction J.

Section II - Legal

1. Certification. Applicant certifies that it has answered each question in this application based on its review of the	<input checked="" type="radio"/> Yes <input type="radio"/> No
--	---

<p>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>2. Applicant is:</p> <table border="1"> <tr> <td><input type="radio"/> an individual</td> <td><input type="radio"/> a general partnership</td> <td><input type="radio"/> a for-profit corporation</td> </tr> <tr> <td><input type="radio"/> a limited partnership</td> <td><input checked="" type="radio"/> a not-for-profit corporation</td> <td><input type="radio"/> a limited liability company (LLC/LC)</td> </tr> <tr> <td colspan="3"><input type="radio"/> other</td> </tr> </table> <p>a. If "other", describe nature of applicant in an Exhibit. [Exhibit 2]</p>		<input type="radio"/> an individual	<input type="radio"/> a general partnership	<input type="radio"/> a for-profit corporation	<input type="radio"/> a limited partnership	<input checked="" type="radio"/> a not-for-profit corporation	<input type="radio"/> a limited liability company (LLC/LC)	<input type="radio"/> other		
<input type="radio"/> an individual	<input type="radio"/> a general partnership	<input type="radio"/> a for-profit corporation								
<input type="radio"/> a limited partnership	<input checked="" type="radio"/> a not-for-profit corporation	<input type="radio"/> a limited liability company (LLC/LC)								
<input type="radio"/> other										
<p>3. a. Applicant certifies that it is not the licensee or permittee of the commercial primary station being rebroadcast and that neither it nor any parties to the application have any interest in or connection with the commercial primary station being rebroadcast. See 47 C.F.R. Section 74.1232(d).</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p> <p>See Explanation in [Exhibit 3]</p>									
<p>b. Applicant certifies that the FM translator's (a) coverage contour does not extend beyond the protected contour of the commercial FM primary station to be rebroadcast, or (b) entire 60 dBu contour is contained within the lesser of: (i) the 2 mV/m daytime contour of the AM primary station to be rebroadcast, or (ii) a 25-mile radius centered at the AM primary station's transmitter site.</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p> <p>See Explanation in [Exhibit 4]</p>									
<p>NOTE: If No to a. and b., and no waiver has been requested in an Exhibit, this application is unacceptable for filing. See 47 C.F.R. Section 74.1232(d).</p> <p>If Yes to (a) and No to (b) applicant is prohibited from receiving any support, before or after construction, either directly or indirectly from the commercial primary station being rebroadcast or from any person or entity having any interest whatsoever, or any connection with the primary FM station. Interested and connected parties include group owners, corporate parents, shareholders, officers, directors, employees, general and limited partners, family members and business associates. See 47 C.F.R. Section 74.1232(e).</p>										
<p>4. The applicant, if for a commercial FM translator station with a coverage contour extending beyond the protected contour of the commercial primary station being rebroadcast, certifies that it has not received any support, before or after constructing, directly or indirectly, from the licensee/permittee of the primary station or any person with an interest in or connection with the licensee or permittee of the primary station, except for technical assistance as provided for under 47 C.F.R. Section 74.1232(e).</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p> <p>See Explanation in [Exhibit 5]</p>									
<p>5. For applicants proposing translator rebroadcasts that are not the licensee of the primary station, the applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted. If No, this application is unacceptable for filing.</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p>									
<p>6. Character Issues. Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:</p> <p>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</p> <p>b. any pending broadcast application in which character issues have been raised.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 6]</p>									
<p>7. 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 the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.</p> <p>If the answer is "No," attach as an Exhibit a full disclosure concerning the persons and matters involved, including an identification of 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 date of filing; and (ii) the disposition of the previously reported matter.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 7]</p>									

8.	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.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 8]
9.	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.	<input checked="" type="radio"/> Yes <input type="radio"/> No
10.	Local Public Notice. Applicant certifies compliance with the public notice requirements of 47 C.F.R. Section 73.3580.	<input checked="" type="radio"/> Yes <input type="radio"/> No
11.	Auction Authorization. If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable. An exhibit is required unless this question is inapplicable.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 9]
12.	Anti-Drug Abuse Act Certification. 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
13.	Equal Employment Opportunity (EEO). 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

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 SYLVIA STROBEL	Typed or Printed Title of Person Signing SENIOR VICE PRESIDENT & CHIEF HUMAN RESOURCES OFFICER
Signature	Date 9/21/2015

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (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 ENGLISH	Relationship to Applicant (e.g., Consulting Engineer) TECHNICAL CONSULTANT	
Signature	Date 9/21/2015	
Mailing Address DOUG VERNIER TELECOMMUNICATIONS CONSULTANTS 401 MAIN STREET, SUITE 213		
City CEDAR FALLS	State or Country (if foreign address) IA	Zip Code 50613 -
Telephone Number (include area code) 3192668402	E-Mail Address (if available) KENGLISH@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).

Section III-A - Engineering

TECHNICAL SPECIFICATIONS											
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.											
TECH BOX											
1. Channel: 215											
2. Primary Station:											
Facility ID Number			Call Sign			City			State		
42940			WSCD-FM			DULUTH			MN		
3. Delivery Method (Select One):											
<input type="radio"/> Off-air <input type="radio"/> Microwave <input checked="" type="radio"/> Satellite <input type="radio"/> Via <input type="radio"/> Other											
4. Antenna Location Coordinates: (NAD 27)											
Latitude:											
Degrees 46 Minutes 47 Seconds 20.2 <input checked="" type="radio"/> North <input type="radio"/> South											
Longitude:											
Degrees 92 Minutes 7 Seconds 4.3 <input checked="" type="radio"/> West <input type="radio"/> East											
5. Antenna Structure Registration Number: 1024128											
<input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA											
6. Antenna Location Site Elevation Above Mean Sea Level:									375 meters		
7. Overall Tower Height Above Ground Level:									129 meters		
8. Height of Radiation Center Above Ground Level:									78 meters(H) 78 meters(V)		
9. Effective Radiated Power:									0.099 kW(H) 0.099 kW(V)		
10. Transmitting Antenna:											
Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under CDBS Public Access (http://licensing.fcc.gov/prod/cdbs/pubacc/prod/cdbs_pa.htm). Make sure that the Standard Pattern is marked Yes and that the relative field values shown match your values. Enter the Manufacturer (Make) and Model exactly as displayed in the Antenna Search.											
<input checked="" type="radio"/> Nondirectional <input type="radio"/> Directional Off-the Shelf <input type="radio"/> Directional composite											
Manufacturer ERI Model 100A-1											
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](#)

11. For FM Boosters and Fill-in translators only.											
a. FM Fill-in translators. Applicant certifies that the FM translator's (a) coverage contour does not extend beyond the protected contour of the commercial FM primary station to be rebroadcast, or (b) entire 60 dBu contour is contained within the lesser of: (i) the 2 mV/m daytime contour of the AM primary station to be rebroadcast, or (ii) a 25-mile radius centered at the AM primary station's transmitter site.										<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	
b. FM Boosters. Applicant certifies that the FM Booster station's service contour is entirely within the primary station's protected coverage contour.										<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A	
										See Explanation in [Exhibit 10]	
										See Explanation in [Exhibit 11]	
12. Interference. The proposed facility complies with all of the following applicable rule sections. Check all that apply:											
										<input checked="" type="radio"/> Yes <input type="radio"/> No	
										See Explanation in [Exhibit 12]	

	<p>Overlap Requirements. <input checked="" type="checkbox"/> a) 47 C.F.R. Section 74.1204 Exhibit Required.</p> <p>Television Channel 6 Protection. <input type="checkbox"/> b) 47 C.F.R. Section 74.1205 with respect to station(s) Exhibit Required.</p>	<p>[Exhibit 13]</p> <p>[Exhibit 14]</p>
13.	<p>Unattended operation. Applicant certifies that unattended operation is not proposed, or if this application proposes unattended operation, the applicant certifies that it will comply with the requirements of 47 C.F.R. Section 74.1234.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 15]</p>
14.	<p>Multiple Translators. Applicant certifies that it does not have any interest in an application or an authorization for an FM translator station that serves substantially the same area and rebroadcasts the same signal as the proposed FM translator station.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 16]</p>
15.	<p>Environmental Protection Act. Applicant certifies that 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 Appendix A, an Exhibit is required.</p> <p>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.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 17]</p>
<p>PREPARER'S CERTIFICATION ON PAGE 4 MUST BE COMPLETED AND SIGNED.</p>		

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

<p>Preliminary Matter: Does this application provide fill-in service only?</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
<p>1. Established Local Applicant: 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.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
<p>2. Diversity of Ownership: Applicant certifies that the principal community (city grade) contour of the proposed station does not overlap the principal community contour of any other authorized radio station (including AM, FM, and non-fill-in FM translator stations, commercial or noncommercial) 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 qualification in a local public inspection file and has submitted to the Commission copies of the documentation.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
<p>3. State-wide Network: 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.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
<p>4. Technical Parameters: Applicant certifies that the numbers in the boxes below accurately reflect the new (increased) area and population that its proposal would serve with a 60 dBu signal measured in accordance with the standard predicted contours in 47 C.F.R. Section 73.713(c) 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 the station's existing service area). (Points, if any, will be determined by FCC)</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p>
<p>New (increased) area served in square kilometers (excluding areas of water):</p>	
<p>Population served based on the most recent census block data from the United States Bureau of Census using the centroid method:</p>	
<p>Tie Breakers</p>	

5.	<p>Existing Authorizations. a. By placing a number in the box, the applicant certifies that it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date filing, existing authorizations for the following number of relevant broadcast stations. FM translator applicants should count all attributable full service radio stations, AM and FM, commercial and noncommercial and FM translator stations other than fill-in stations.</p> <p>(number of attributable commercial and non-commercial licenses and construction permits)</p> <p>b. (Fill-in Applicants Only.) By placing a number in the box, the applicant certifies that, in addition to the station identified in 5(a), it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date filing, existing authorizations for the following number of FM translators.</p>
6.	<p>Pending Applications. a. By placing a number in the box, the applicant certifies that it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date filing, pending applications for new or major changes to the following number of relevant broadcast stations, AM and FM, commercial and non-commercial and FM translator stations other than fill-in stations.</p> <p>(number of attributable commercial and non-commercial applications)</p> <p>b. (Fill-in Applicants Only.) By placing a number in the box, the applicant certifies that, in addition to the station identified in 5(a), it and any persons and organizations with attributable interests in the applicant pursuant to 47 C.F.R. Section 73.3555 have, as of the date of filing, existing authorizations for the following number of FM translators.</p>

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 SYLVIA STROBEL	Typed or Printed Title of Person Signing SENIOR VICE PRESIDENT
Signature	Date 9/21/2015

Exhibits

Exhibit 10

Description: FILL-IN TRANSLATOR

PLEASE SEE ATTACHED EXHIBIT.

Attachment 10

Description
Exhibit #10, Fill-In Translator

Exhibit 13

Description: OVERLAP REQUIREMENTS/WAIVER REQUEST

PLEASE SEE ATTACHED OVERLAP REQUIREMENT EXHIBIT. THERE IS OVERLAP WITH SECOND ADJACENT STATIONS KUWS AND KDNI. THE INTERFERENCE AREA DOES NOT REACH THE GROUND AND THERE ARE NO POTENTIAL LISTENERS.

THE APPLICANT RESPECTFULLY REQUESTS A WAIVER TO SECTION 74.1235(D)(3) WITH REGARD TO THE DISTANCE TO THE PROPOSED 34 DBU INTERFERING CONTOUR.

Attachment 13

Description
Exhibit #13, Overlap Requirements/Waiver Request

Exhibit 17

Description: ENVIRONMENTAL PROTECTION ACT

THE APPLICANT, MINNESOTA PUBLIC RADIO, PROPOSES THE USE OF AN EXISTING REGISTERED TOWER, ASR #1024128. THIS TOWER WAS CONSTRUCTED IN 1994 AND IS THEREFORE EXCLUDED FROM ENVIRONMENTAL EVALUATION.

THE PROPOSED TRANSLATOR WILL OPERATE WITH 99 WATTS ERP AND IS CATEGORICALLY EXCLUDED FROM EVALUATION. NO FURTHER STUDY WAS DEEMED NECESSARY.

Attachment 17
