

Federal Communications Commission Washington, D.C. 20554 <p style="text-align: center;">FCC 349</p>	Approved by OMB 3060-0405 (March 2001) FOR FCC USE ONLY
<p style="text-align: center;">APPLICATION FOR AUTHORITY TO CONSTRUCT OR MAKE CHANGES IN AN FM TRANSLATOR OR FM BOOSTER STATION</p> <p style="text-align: center;">Read INSTRUCTIONS Before Filling Out Form</p>	FOR COMMISSION USE ONLY FILE NO. BPFT - 20040609ABK

Section I - General Information

1.	Legal Name of the Applicant MINNESOTA PUBLIC RADIO Mailing Address 45 EAST 7TH 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> <tr> <td>Telephone Number (include area code) 6512901259</td> <td colspan="2">E-Mail Address (if available) MGRAMLING@MPR.ORG</td> </tr> <tr> <td>Call Sign K297AH</td> <td colspan="2">Facility Identifier 42907</td> </tr> </table>	City ST. PAUL	State or Country (if foreign address) MN	ZIP Code 55101 -	Telephone Number (include area code) 6512901259	E-Mail Address (if available) MGRAMLING@MPR.ORG		Call Sign K297AH	Facility Identifier 42907	
City ST. PAUL	State or Country (if foreign address) MN	ZIP Code 55101 -								
Telephone Number (include area code) 6512901259	E-Mail Address (if available) MGRAMLING@MPR.ORG									
Call Sign K297AH	Facility Identifier 42907									
2.	Contact Representative (if other than Applicant) TODD M STANSBURY, ESQ. Mailing Address 1776 K STREET NW <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 20006 -</td> </tr> <tr> <td>Telephone Number (include area code) 2027194948</td> <td colspan="2">E-Mail Address (if available) TSTANSBU@WRF.COM</td> </tr> </table>	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20006 -	Telephone Number (include area code) 2027194948	E-Mail Address (if available) TSTANSBU@WRF.COM				
City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20006 -								
Telephone Number (include area code) 2027194948	E-Mail Address (if available) TSTANSBU@WRF.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									
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>WINONA</td> <td>MN</td> </tr> </tbody> </table>	Community (ies)	State	WINONA	MN					
Community (ies)	State									
WINONA	MN									
5.	<p>Application Purpose</p> <table style="width:100%;"> <tr> <td style="width:50%; vertical-align: top;"> <input type="radio"/> New station <input type="radio"/> Major Change in licensed facility <input checked="" type="radio"/> Minor Change in licensed facility </td> <td style="width:50%; vertical-align: top;"> <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 </td> </tr> </table> <p>a. File number of original construction permit: _____</p> <p>If an amendment, submit as an Exhibit a listing by Section and Question Number the [Exhibit 1] portions of the pending application that are being revised.</p>	<input type="radio"/> New station <input type="radio"/> Major Change in licensed facility <input checked="" type="radio"/> Minor Change in licensed facility	<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							
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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.	<p>Certification. 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>Applicant is:</p> <table border="1" style="width:100%"> <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											
3.	<p>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 See Explanation in [Exhibit 3]</p>									
	<p>b. Applicant certifies that the coverage contour of the translator station will not extend beyond the protected contour of the commercial primary station being rebroadcast.</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A 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 No to a. and Yes 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>											
4.	<p>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 See Explanation in [Exhibit 5]</p>									
5.	<p>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>									
6.	<p>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</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 6]</p>									

	<p>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>	
7.	<p>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.	<p>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.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 8]</p>
9.	<p>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.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
10.	<p>Local Public Notice. Applicant certifies compliance with the public notice requirements of 47 C.F.R. Section 73.3580.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
11.	<p>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.</p> <p>An exhibit is required unless this question is inapplicable.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input checked="" type="radio"/> N/A</p> <p>See Explanation in [Exhibit 9]</p>
12.	<p>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.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
13.	<p>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.</p>	<p><input type="radio"/> Yes <input type="radio"/> No</p> <p><input checked="" type="radio"/> N/A</p>

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 6/9/2004

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 MICHLER	Relationship to Applicant (e.g., Consulting Engineer) TECHNICAL CONSULTANT	
Signature	Date 6/2/2004	
Mailing Address DOUG VERNIER TELECOMMUNICATIONS CONSULTANTS 721 WEST 1ST STREET, SUITE A		
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).

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: 297		
2.	Primary Station:		
	Call Sign	City	State
	KZSE	ROCHESTER	MN
			Channel
			214
3.	Delivery Method (Select One): <input checked="" type="radio"/> Off-air <input type="radio"/> Microwave <input type="radio"/> Satellite <input type="radio"/> Via <input type="radio"/> Other		
4.	Antenna Location Coordinates: (NAD 27)		
	Latitude:		
	Degrees 44 Minutes 4 Seconds 26 <input checked="" type="radio"/> North <input type="radio"/> South		
	Longitude:		
	Degrees 91 Minutes 34 Seconds 38 <input checked="" type="radio"/> West <input type="radio"/> East		
5.	Antenna Structure Registration Number: 1200126 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA		
6.	Antenna Location Site Elevation Above Mean Sea Level:	354 meters	
7.	Overall Tower Height Above Ground Level:	142 meters	
8.	Height of Radiation Center Above Ground Level:	122 meters(H) 122 meters(V)	
9.	Effective Radiated Power:	0.075 kW(H) 0.075 kW(V)	
10.	Transmitting Antenna:		

Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under CDBS Public Access (http://svartifoss2.fcc.gov/prod/cdbbs/pubacc/prod/cdbbs_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.

Nondirectional Directional "Off-the-shelf" Directional composite

Manufacturer SCA Model CA5-150C

Rotation:230degrees 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.	<p>For FM Boosters and Fill-in translators only. Applicant certifies that the proposal is for a fill-in translator or booster station entirely within the primary station's protected contour.</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A</p>
		See Explanation in [Exhibit 10];
12.	<p>Interference. The proposed facility complies with all of the following applicable rule sections. Check all that apply:</p> <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><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 11] [Exhibit 12] [Exhibit 13]</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 14]</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 15]</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 16]</p>

PREPARER'S CERTIFICATION ON PAGE 4 MUST BE COMPLETED AND SIGNED.

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.

Preliminary Matter: Does this application provide fill-in service only?		<input type="radio"/> Yes <input type="radio"/> No
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.	<input type="radio"/> Yes <input type="radio"/> No
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.	<input type="radio"/> Yes <input type="radio"/> No
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.	<input type="radio"/> Yes <input type="radio"/> No
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)	<input type="radio"/> Yes <input type="radio"/> No
	New (increased) area served in square kilometers (excluding areas of water):	
	Population served based on the most recent census block data from the United States Bureau of Census using the centroid method:	
Tie Breakers		
5.	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. (number of attributable commercial and non-commercial licenses and construction permits) 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.	
6.	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.	

(number of attributable commercial and non-commercial applications)

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.

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 6/9/2004

Exhibits

Exhibit 1

Description: ENGINEERING STATEMENT

THE ATTACHED ENGINEERING STATEMENT DESCRIBES THE PROPOSED CHANGES AND SERVES AS AN INDEX OF ATTACHMENTS.

Attachment 1

Description
Exhibit #1, Engineering Statement

Exhibit 12

Description: OVERLAP REQUIREMENTS

THE INSTANT PROPOSAL MEETS ALL REQUIREMENTS FOR CONTOUR OVERLAP PROTECTION OF STATIONS, TRANSLATORS, CONSTRUCTION PERMITS AND APPLICATIONS, IN COMPLIANCE WITH SECTION 74.1204.

Attachment 12

Description
Exhibit #12, Overlap Requirements

Exhibit 16

Description: RF EMISSIONS COMPLIANCE STATEMENT

THE ATTACHED EXHIBIT DEALS WITH COMPLIANCE WITH THE COMMISSION'S STANDARDS FOR RF EMISSIONS.

Attachment 16

Description
Exhibit #16, RF Emissions Compliance Statement

EXHIBIT #1
ENGINEERING STATEMENT

Concerning the Application of
Minnesota Public Radio
To Make a Minor Change to Translator
K297AH
BLFT-19990730TC
Serving Winona, Minnesota

May 2004

Channel 297D

0.075 kW H & V DA

This engineering statement supports the application filed by Minnesota Public Radio to make a minor change to licensed translator K297AH (BLFT-19990730TC) serving Winona, Minnesota.

The applicant proposes to change transmitter location, increase ERP and install a directional antenna. The current transmitter site is terrain shielded from the primary station, due to the presence of a bluff in the direct line of site between the two locations. This move is intended to provide better line of site, improving the reliability of service to the city of license. A change area map which depicts the 60 dbu contour of the proposed facility, as well as the currently authorized license is attached as Page #3 of this exhibit (Ex #1). The N.G.D.C. 30 sec terrain database was used for this and all other exhibits.

The new transmitter location is situated east of the Mississippi River. However the city of license, Winona, is west of the Mississippi. Therefore, the power limitations of Section 74.1235(b)(2) were used to determine the maximum ERP. If a waiver of the Commission's Rules to continue this service to a city west of the Mississippi is necessary, it is hereby requested. The height above average terrain of the highest of the twelve cardinal radials (120°) is 262.7 meters, limiting power to 0.034 kW. This radial is located within the null of the directional antenna. Page #4 of this engineering statement is a table of the distances to the 60 dBu contour of the proposed facility. Along each radial, the power of the antenna does not exceed the maximum for the relative height above average terrain. The antenna is rotated to 230°, with an HAAT of 185.6 meters, 0.075 kW.

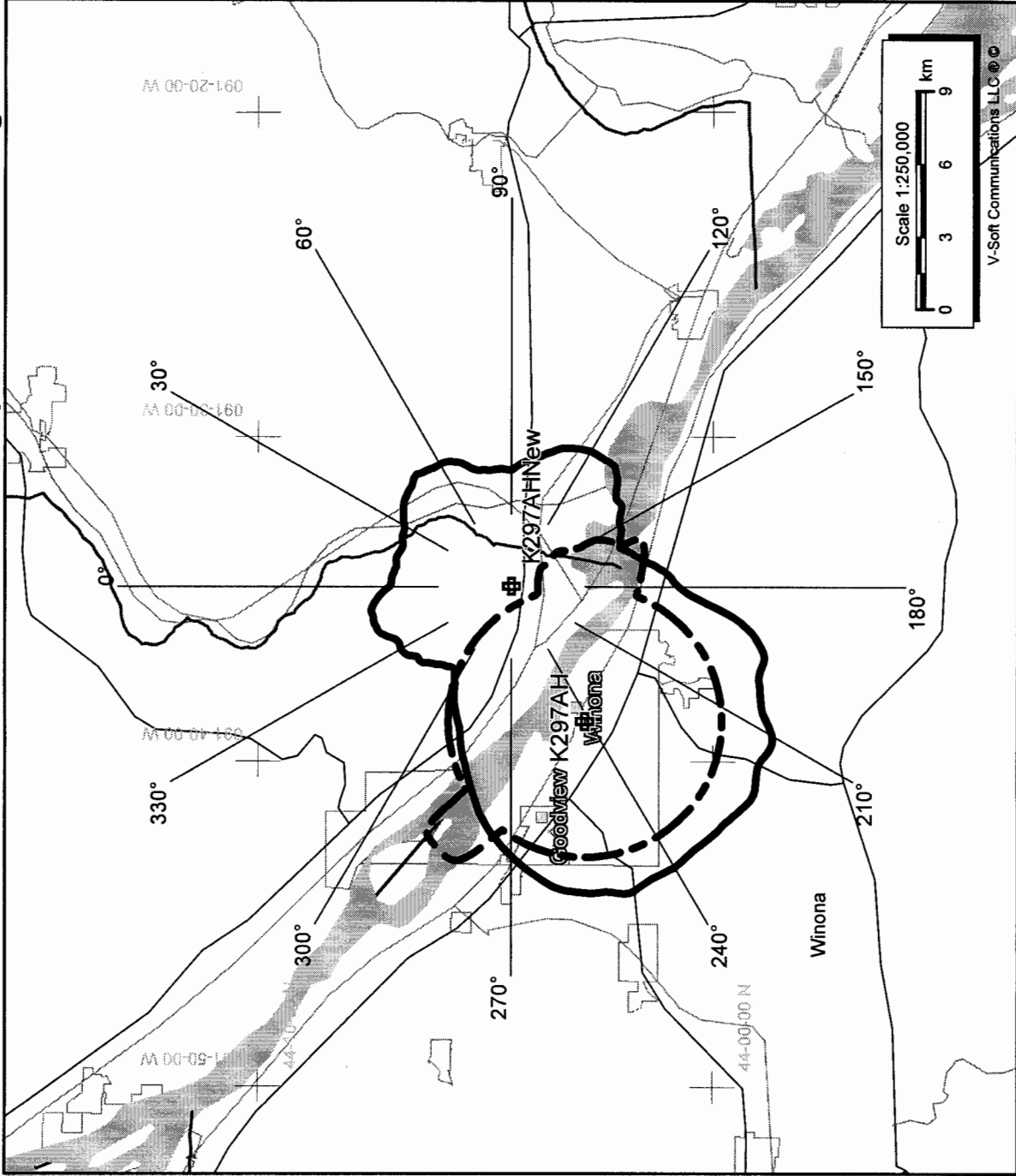
Exhibit #12 is a single channel, contour to contour, allocation study showing that interference is not caused to any FM radio station, translator, construction permit or application. Page # 2 of this exhibit is a narrative explaining the procedures and

conventions used in the study. Page #3-7 are allocation study maps and FMOVER tabulations showing the relationship between the applicant's proposal and critical stations KROC-FM, Rochester, as well as a pending application for a translator in LaCrosse (BNPFT-20030313AUF). There are no pertinent I.F. relationships. The proposal is not within 320 kilometers of the U.S. border with Canada or Mexico, and is outside the protected zone of any AM station, Table Mountain, FCC monitoring stations and the West Virginia Quiet Zone.

Exhibit #16 shows compliance with the Commission's R.F. emission's standards.

Page #5 of this exhibit (Ex. # 1) is a declaration made by the preparer attesting to her qualifications.

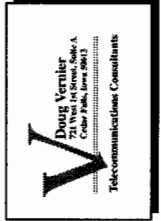
K297AH Proposed 60 dBu Change Area



K297AHNew
 Minor Change
 Latitude: 44-04-26 N
 Longitude: 091-34-38 W
 ERP: 0.075 kW
 Channel: 297
 Frequency: 107.3 MHz
 AMSL Height: 475.0 m
 HAAT: 209.54 m
 Horiz. Pattern: Directional
 Vert. Pattern: No
 Prop Model: None
 Population: 31,414

K297AH
 BLFT19990730TC
 Latitude: 44-02-49 N
 Longitude: 091-38-47 W
 ERP: 0.095 kW
 Channel: 297
 Frequency: 107.3 MHz
 AMSL Height: 256.0 m
 HAAT: 0.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Population: 29,474

June 1, 2004



Doug Vernier Telecommunications Consultants
 N. Lat. = 44 04 26 W. Lng. = 91 34 38
 HAAT and Distance to Contour - FCC Method - 30 Arc Sec.

K297AH, Minor Change to License

Azi.	AV EL	HAAT	Max ERP kW	ERP kW	dBk	Field	60-F5 km
0	260.1	214.9	0.050	0.0014	-28.43	0.138	4.94
30	292.3	182.7	0.075	0.0020	-27.05	0.162	5.08
60	257.8	217.2	0.050	0.0024	-26.15	0.180	5.81
90	230.0	245.0	0.041	0.0012	-29.33	0.125	4.87
120	212.3	262.7	0.034	0.0026	-25.84	0.186	6.47
150	252.7	222.3	0.050	0.0015	-28.25	0.141	5.07
180	322.1	152.9	0.115	0.0091	-20.40	0.349	7.00
210	288.4	186.6	0.075	0.0574	-12.41	0.875	12.30
240	272.5	202.5	0.062	0.0668	-11.76	0.943	13.24
270	227.0	248.0	0.041	0.0194	-17.13	0.508	10.86
300	285.1	189.9	0.075	0.0014	-28.66	0.135	4.62
330	307.9	167.1	0.092	0.0025	-26.07	0.182	5.21

Additional Radials (Not Considered in Average):

230	289.4	185.6	0.075	0.075	-11.50	1.000	13.08
-----	-------	-------	-------	-------	--------	-------	-------

Ave EI = 267.36 M HAAT = 207.64 M AMSL = 475 M

Declaration:

I, Katherine A. Michler, have received a Bachelor of Science degree from the University of Northern Iowa, and;

That, I declare that I have received training as a technical consultant as a member of the staff of Doug Vernier Telecommunications Consultants, and;

That, I have apprenticed under Douglas Vernier for over six years, and;

That, he has been active in broadcast consulting for over 25 years, and;

That, his qualifications are a matter of record with the Federal Communications Commission, and;

That, I am an Associate Member (#20792) of the Society of Broadcast Engineers, Indianapolis, Indiana, and;

That, the consulting firm of Doug Vernier Telecommunications Consultants has been retained by Minnesota Public Radio, St. Paul, Minnesota;

That, I have personally prepared these engineering showings, the technical information contained in same and the facts stated within are true to my knowledge, and;

That, under penalty of perjury, I declare that the foregoing is correct.

Katherine A. Michler Katherine A. Michler

Executed on June 9, 2004

K297AH - Scala CA5-150C

Minor Modification

REFERENCE CH# 297D - 107.3 MHz, Pwr= 0.075 kW, HAAT=262.7 M, COR= 475 M DISPLAY DATES
 44 04 26 N Average Protected F(50-50)= 15.51 km DATA 05-20-04
 91 34 38 W Ave. F(50-10) 40 dBu= 51.0 54 dBu= 23.4 80 dBu= 4.3 100 dBu= .6 SEARCH 05-26-04

CH CITY	CALL	TYPE STATE	AZ1. <--	DIST FILE #	LAT. LNG.	Pwr(kW) HAAT(M)	COR(M) INT(km)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
297D Winona	K297AH	LIC MN	241.6 61.6	6.30 BLFT19990730TC	44 02 49 91 38 47	0.095 10	256 18.3	5.6 Minnesota Public Radio	-25.34*<	-43.42<
297D La Crosse	AP297	APP WI	131.1 311.1	38.21 BNPFT20030313AUF	43 50 51 91 13 08	0.250 37	227 26.1	7.8 Sister Grace, Inc.	5.62	7.79
297D La Crosse	AP297	APP WI	131.1 311.1	38.21 BNPFT20030314ALB	43 50 51 91 13 08	0.250 37	227 26.1	7.8 Sister Grace, Inc.	5.62	7.79
295CO Rochester	KROCFM	LIC MN	230.9 50.9	88.30 BLH7076	43 34 15 92 25 37	100.000 357	755 11.0	76.6 Southern Minnesota Broadca	64.19	11.07
295CO Rochester	KROCFM	APP MN	231.0 51.0	88.71 BPH20030917AEL	43 34 08 92 25 53	100.000 459	857 12.2	84.1 Southern Minnesota Broadca	63.39	4.04
298C1 Neillsville	WCCNFM	LIC WI	52.6 232.6	95.65 BLH19980513KC	44 35 30 90 37 09	100.000 192	504 93.5	63.0 Central Wisconsin B/cg Inc	-3.83<	23.96
296D La Crescent	AP296	APP MN	150.7 330.7	34.29 BNPFT20030317KYE	43 48 17 91 22 06	0.003 86	418 5.7	4.0 Evangel Ministries, Inc.	23.54	22.75
299A St. Charles	KLCX	LIC MN	266.0 86.0	51.49 BLH19980410KF	44 02 25 92 13 05	1.950 201	533 2.5	30.0 Cumulus Licensing Lic	37.23	21.17
297D Red Wing	K297AF	LIC MN	305.4 125.4	93.28 BLFT19960528TE	44 33 19 92 32 06	0.005 21	323 8.5	2.7 Krch Of Minnesota, Inc.	80.65	77.19
299D La Crosse	W299AC	LIC WI	147.2 327.2	41.91 BLFT19931012TJ	43 45 25 91 17 40	0.001 95	369 0.1	3.1 Family Radio, Inc.	36.57	38.74
296D Cashton	AP296	APP WI	120.1 300.1	74.15 BNPFT20030317MUC	43 44 15 90 46 48	0.250 82	462 17.0	11.7 Pene L. Kunau	50.68	52.89
294C2 Chetek	WATQ	LIC WI	354.4 174.4	124.01 BLH19970602KI	45 11 04 91 43 52	35.000 208	510 6.3	54.8 Capstar Tx Limited Partner	112.17	69.14

ERP and HAAT are on direct line to and from reference station.
 "*"Affixed to 'IN' or 'Out' values = site inside protected contour.
 "<" = Station meets FCC minimum distance spacing for its class. "<" = Contour Overlap

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.

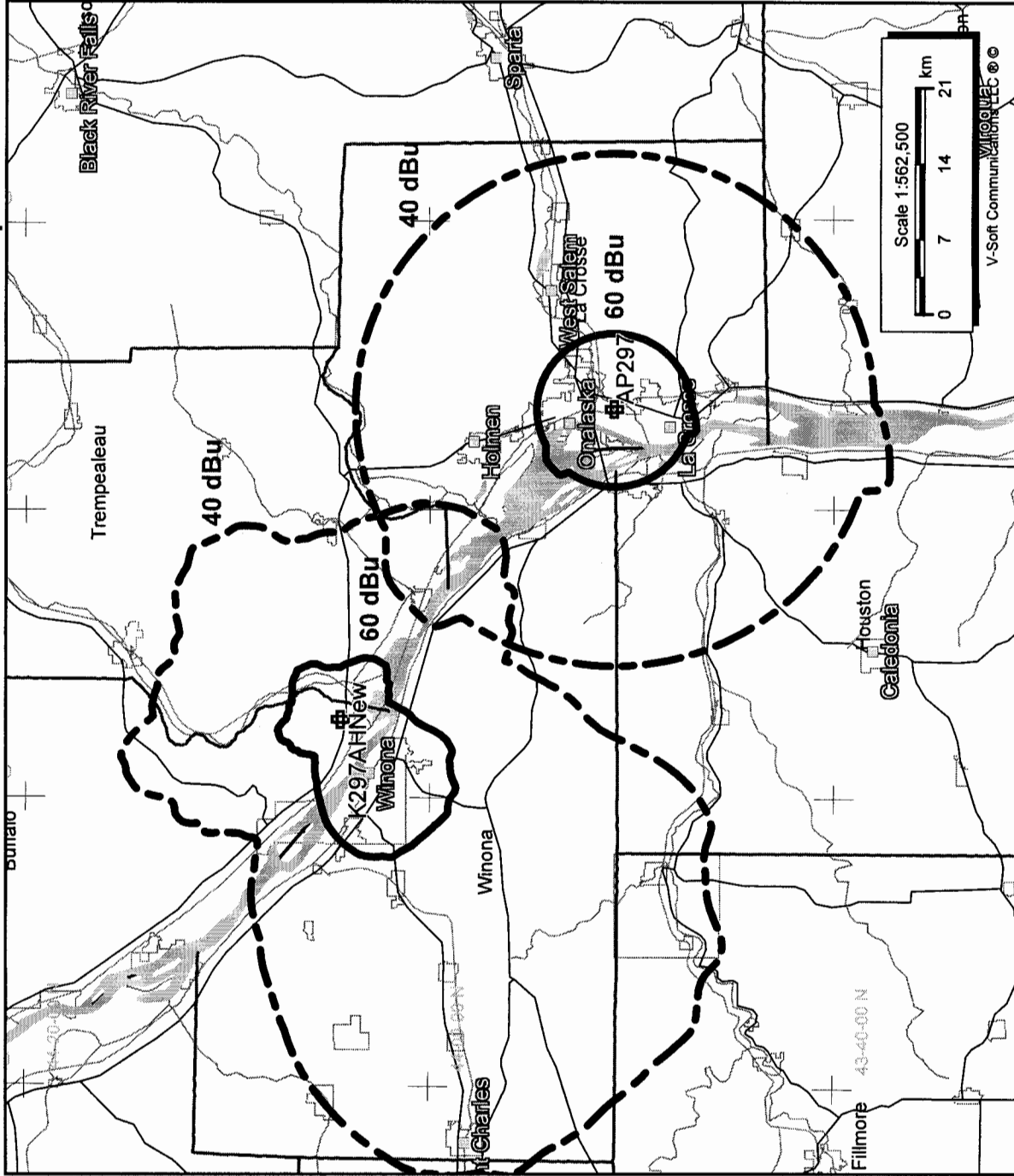
Under the "AZIMUTH" column, the first row of numbers indicate the bearings from True North of the data base stations in relationship with the reference station, while the numbers in the second row indicate the reverse bearings from the database station to the reference station.

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".

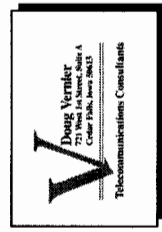
K297AH Proposed v. AP297



K297AHNew
 Minor Change
 Latitude: 44-04-26 N
 Longitude: 091-34-38 W
 ERP: 0.075 kW
 Channel: 297
 Frequency: 107.3 MHz
 AMSL Height: 475.0 m
 HAAT: 209.54 m
 Horiz. Pattern: Directional
 Vert. Pattern: No
 Prop Model: None

AP297
 BNPFT20030313AUF
 Latitude: 43-50-51 N
 Longitude: 091-13-08 W
 ERP: 0.25 kW
 Channel: 297
 Frequency: 107.3 MHz
 AMSL Height: 227.0 m
 HAAT: 0.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No

June 1, 2004



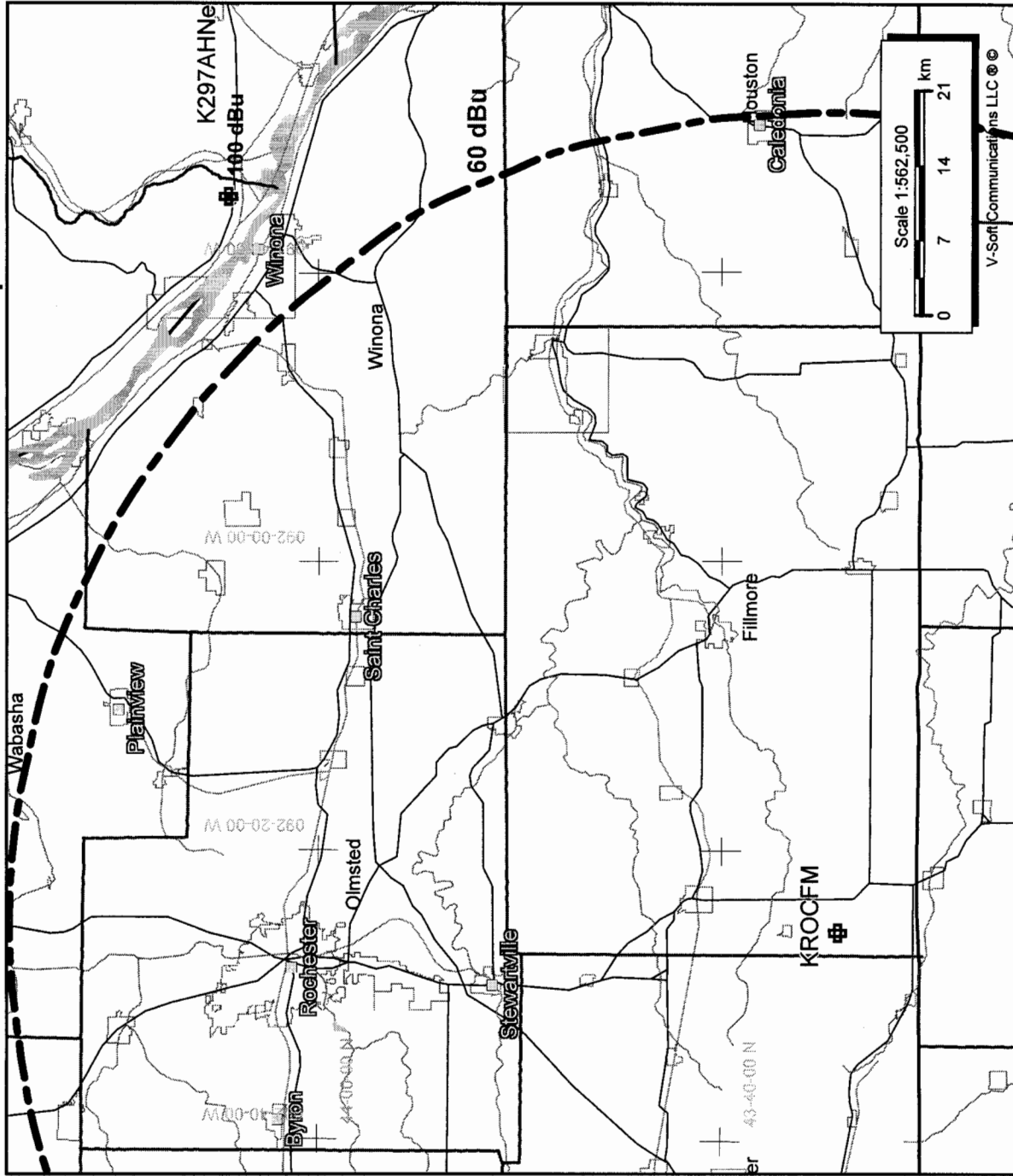
AP297 BNPFT20030314ALB
 Channel = 297D
 Max ERP = 0.25 kW
 RCAMSL = 227 M
 N. Lat = 43 50 51
 W. Lng = 91 13 08

K297AH
 Channel = 297D
 Max ERP = 0.075 kW
 RCAMSL = 475 M
 N. Lat = 440426
 W. Lng = 913438

Protected
 60 dBu

Interfering
 40 dBu

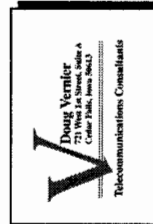
Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
294.0	000.2500	-0013.7	007.1	135.0	000.0021	0263.5	031.5	33.3
295.0	000.2500	-0010.9	007.1	134.8	000.0022	0263.5	031.5	33.4
296.0	000.2500	-0008.5	007.1	134.6	000.0022	0263.5	031.4	33.4
297.0	000.2500	-0003.6	007.1	134.4	000.0022	0267.9	031.4	33.6
298.0	000.2500	0003.7	007.1	134.1	000.0022	0267.9	031.3	33.6
299.0	000.2500	0010.8	007.1	133.9	000.0022	0267.9	031.3	33.7
300.0	000.2500	0016.0	007.1	133.7	000.0022	0267.9	031.3	33.7
301.0	000.2500	0020.3	007.1	133.5	000.0022	0270.8	031.3	33.9
302.0	000.2500	0024.2	007.1	133.3	000.0022	0270.8	031.2	33.9
303.0	000.2500	0027.0	007.1	133.0	000.0023	0270.8	031.2	33.9
304.0	000.2500	0027.8	007.1	132.8	000.0023	0270.8	031.2	34.0
305.0	000.2500	0028.2	007.1	132.6	000.0023	0270.8	031.2	34.0
306.0	000.2500	0029.4	007.1	132.4	000.0023	0273.7	031.1	34.1
307.0	000.2500	0031.4	007.2	132.2	000.0023	0273.7	031.0	34.2
308.0	000.2500	0033.8	007.5	132.0	000.0023	0273.7	030.7	34.4
309.0	000.2500	0035.7	007.7	131.7	000.0023	0273.7	030.5	34.5
310.0	000.2500	0036.6	007.8	131.5	000.0024	0276.3	030.4	34.7
311.0	000.2500	0036.9	007.8	131.2	000.0024	0276.3	030.4	34.8
312.0	000.2500	0036.8	007.8	131.0	000.0024	0276.3	030.4	34.8
313.0	000.2500	0036.8	007.8	130.7	000.0024	0276.3	030.4	34.8
314.0	000.2500	0036.8	007.8	130.5	000.0024	0277.5	030.4	34.9
315.0	000.2500	0036.8	007.8	130.2	000.0024	0277.5	030.4	34.9
316.0	000.2500	0036.8	007.8	130.0	000.0025	0277.5	030.4	34.9
317.0	000.2500	0036.8	007.8	129.7	000.0025	0277.5	030.5	34.9
318.0	000.2500	0036.8	007.8	129.4	000.0025	0276.9	030.5	34.9
319.0	000.2500	0036.8	007.8	129.2	000.0025	0276.9	030.5	34.9
320.0	000.2500	0036.9	007.8	128.9	000.0025	0276.9	030.5	34.9
321.0	000.2500	0036.8	007.8	128.7	000.0025	0276.9	030.5	34.9
322.0	000.2500	0036.7	007.8	128.4	000.0025	0275.2	030.6	34.8
323.0	000.2500	0036.4	007.8	128.2	000.0025	0275.2	030.6	34.8
324.0	000.2500	0036.0	007.7	128.0	000.0025	0275.2	030.7	34.7
325.0	000.2500	0035.4	007.7	127.8	000.0025	0275.2	030.8	34.7
326.0	000.2500	0034.7	007.6	127.6	000.0025	0275.2	030.9	34.6
327.0	000.2500	0033.8	007.5	127.4	000.0025	0272.9	031.1	34.5



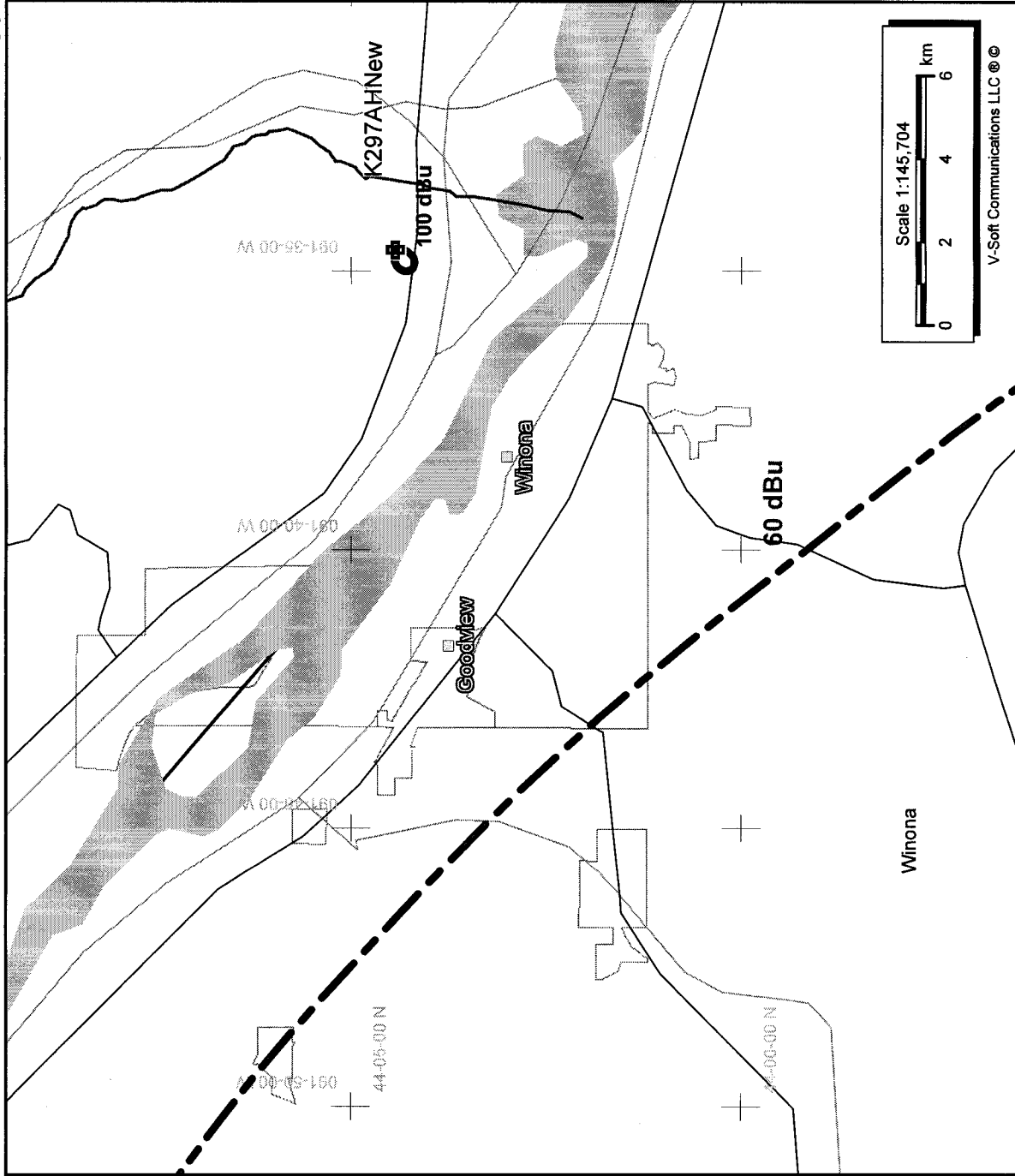
K297AHNew
 Minor Change
 Latitude: 44-04-26 N
 Longitude: 091-34-38 W
 ERP: 0.075 kW
 Channel: 297
 Frequency: 107.3 MHz
 AMSL Height: 475.0 m
 HAAT: 209.54 m
 Horiz. Pattern: Directional
 Vert. Pattern: No
 Prop Model: None

KROCFM
 BLH7076
 Latitude: 43-34-15 N
 Longitude: 092-25-37 W
 ERP: 100.00 kW
 Channel: 295
 Frequency: 106.9 MHz
 AMSL Height: 755.0 m
 HAAT: 338.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No

June 1, 2004



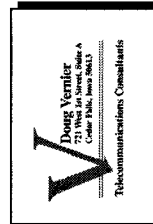
Ex #12, Pg #6
K297AH Proposed v. KROC-FM (Close-Up)



K297AHNew
 Minor Change
 Latitude: 44-04-26 N
 Longitude: 091-34-38 W
 ERP: 0.075 kW
 Channel: 297
 Frequency: 107.3 MHz
 AMSL Height: 475.0 m
 HAAT: 209.54 m
 Horiz. Pattern: Directional
 Vert. Pattern: No
 Prop Model: None

KROC-FM
 BLH7076
 Latitude: 43-34-15 N
 Longitude: 092-25-37 W
 ERP: 100.00 kW
 Channel: 295
 Frequency: 106.9 MHz
 AMSL Height: 755.0 m
 HAAT: 338.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No

June 1, 2004



KROCFM BLH7076
 Channel = 295C0
 Max ERP = 100 kW
 RCAMSL = 755 M
 N. Lat = 43 34 15
 W. Lng = 92 25 37

K297AH
 Channel = 297D
 Max ERP = 0.075 kW
 RCAMSL = 475 M
 N. Lat = 440426
 W. Lng = 913438

Protected
 60 dBu

Interfering
 100 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
033.0	100.0000	0355.3	076.5	287.4	000.0038	0235.9	027.8	37.1
034.0	100.0000	0355.0	076.4	286.7	000.0042	0235.9	026.4	38.4
035.0	100.0000	0354.8	076.4	285.7	000.0047	0235.9	025.1	39.8
036.0	100.0000	0354.9	076.4	284.6	000.0053	0235.6	023.9	41.2
037.0	100.0000	0355.2	076.5	283.3	000.0060	0239.7	022.6	42.8
038.0	100.0000	0355.5	076.5	281.9	000.0068	0243.6	021.4	44.5
039.0	100.0000	0355.9	076.5	280.3	000.0079	0250.7	020.2	46.3
040.0	100.0000	0356.1	076.5	278.3	000.0098	0254.6	019.1	48.3
041.0	100.0000	0356.0	076.5	276.0	000.0125	0253.8	017.9	50.2
042.0	100.0000	0356.0	076.5	273.4	000.0159	0250.4	016.9	52.1
043.0	100.0000	0356.1	076.5	270.3	000.0204	0248.0	015.9	53.9
044.0	100.0000	0356.4	076.5	266.9	000.0259	0247.7	014.9	55.5
045.0	100.0000	0356.7	076.6	262.9	000.0330	0247.4	014.0	57.6
046.0	100.0000	0357.0	076.6	258.3	000.0414	0238.8	013.3	59.3
047.0	100.0000	0357.1	076.6	253.1	000.0504	0227.4	012.6	60.7
048.0	100.0000	0357.2	076.6	247.4	000.0592	0219.6	012.1	61.9
049.0	100.0000	0357.3	076.6	241.2	000.0665	0204.2	011.7	62.3
050.0	100.0000	0357.4	076.6	234.7	000.0717	0191.5	011.5	62.4
051.0	100.0000	0357.3	076.6	228.0	000.0736	0185.7	011.5	62.3
052.0	100.0000	0357.4	076.6	221.5	000.0690	0193.2	011.7	62.1
053.0	100.0000	0357.9	076.7	215.2	000.0622	0182.3	011.9	60.7
054.0	100.0000	0358.8	076.7	209.2	000.0547	0181.9	012.4	59.5
055.0	100.0000	0360.1	076.8	203.7	000.0447	0168.8	012.9	57.1
056.0	100.0000	0361.3	076.9	198.7	000.0360	0174.5	013.6	55.6
057.0	100.0000	0362.5	077.0	194.3	000.0279	0192.7	014.4	54.3
058.0	100.0000	0363.5	077.1	190.4	000.0216	0189.1	015.3	52.3
059.0	100.0000	0364.4	077.1	187.1	000.0166	0174.5	016.3	49.6
060.0	100.0000	0364.8	077.2	184.4	000.0130	0156.2	017.4	46.6
061.0	100.0000	0364.5	077.1	182.1	000.0103	0148.9	018.5	44.2
062.0	100.0000	0363.9	077.1	180.3	000.0084	0152.9	019.7	42.6
063.0	100.0000	0363.1	077.0	178.7	000.0073	0153.9	020.9	41.1
064.0	100.0000	0362.2	077.0	177.4	000.0064	0161.2	022.2	40.0
065.0	100.0000	0361.3	076.9	176.3	000.0058	0164.9	023.4	38.8
066.0	100.0000	0360.4	076.8	175.3	000.0052	0168.9	024.7	37.7
067.0	100.0000	0360.4	076.8	174.4	000.0047	0172.0	026.0	36.5

EXHIBIT #16

R.F. EMISSION COMPLIANCE STATEMENT

Minnesota Public Radio
K297AH
Winona, Minnesota

May 2004

The proposed one-bay, circularly polarized antenna will be energized such that it produces 0.075 kW ERP in both the horizontal and vertical fields from a center of radiation of 122 meters above ground. Based on 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, the proposed facility is predicted to produce a worst-case maximum R.F. non-ionization radiation level at a position six feet above the tower base (head level - based on the C.O.R. of 122 meters above ground minus 2 meters) of 3.48 microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$). This figure is without regard for the antenna's vertical elevation field value toward the nadir, which will cause a reduction in the predicted "worst case" calculations. $3.48 \mu\text{W}/\text{cm}^2$ is 0.348 percent of the maximum standard value for the frequency in use for a controlled area and 1.74 percent of the maximum for an uncontrolled area. There is one other source of RF emissions on the tower. KHME transmits 5 kW ERP (directional) from a height of 137 meters above ground. Using the same "worst case" calculations, the contribution of KHME to the R.F. non-ionization radiation level at head height is $18.332 \mu\text{W}/\text{cm}^2$, 1.833 percent of maximum for controlled areas and 9.17 percent of the maximum for uncontrolled areas.

Since "worst case" calculations were used, and since it is well known that the actual RF power density level is considerably reduced at vertical angles toward the nadir the applicant is confident that there will be no exposure at the transmitter site greater than the maximum.

The applicant will protect workers on the tower by either reducing ERP or terminating transmission. A sign will be posted warning workers of the antenna, with a phone number to contact someone to reduce or terminate power.

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.