



Stamp and Return

October 29, 2002

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

HAND DELIVERED

RECEIVED

OCT 30 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WMLS FM, Grand Marais, MN  
Facility ID No. 92306  
Minnesota Public Radio, FRN 0002-6425-10  
Request for Extension of Special Temporary Authority

WLSN FM, Grand Marais, MN  
Facility ID No. 92302  
Minnesota Public Radio, FRN 0002-6425-10  
Request for Extension of Special Temporary Authority

Dear Ms Dortch:

On behalf of Minnesota Public Radio ("MPR"), holder of construction permits for WMLS-FM, Grand Marais, MN, and for WLSN-FM, Grand Marais, MN, this is to request further special temporary authority to operate at lower power than authorized in the stations' construction permits due to a variety of technical problems described below and in our February 21, 2002 letter to the Commission (copy attached).

The Commission has previously granted special temporary authority to MPR to operate the stations at reduced power. That special temporary authority expires October 30, 2002.

Since the initial STAs were granted, MPR has been working diligently towards a solution to the issues so that the stations can operate at full power. Since the time of our February 21<sup>st</sup> letter, MPR has retained an outside engineering consultant to assist us in determining the best course of action. Working with the outside consultant, MPR, in consultation with the other broadcasters on the tower, has taken many steps to determine the cause of the problems and possible solutions to the problems. Some of the steps taken include:

- Installation of measuring devices to keep track of the TV station signals over the course of a month; and
- Installation of a pulley system on the tower enabling MPR to take measurements at various heights to try to determine where on the tower the interference is being generated; and

Marlene Dortch  
October 29, 2002  
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- Installation of a signal strength recorder at an alternate site to determine the feasibility of a different site.

In addition, MPR has purchased a filter for WTIP FM and we are in the process of installing the filter to WTIP's facilities.

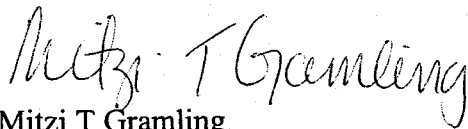
There have been numerous meetings between the affected parties and numerous solution options have been and are being explored. However, a final determination of a solution has not yet been reached.

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

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

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

Sincerely,



Mitzi T Gramling  
Associate General Counsel

Attachment

**Exhibit**

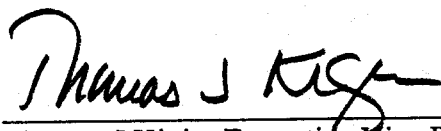
**Anti-Drug Abuse Act Certification**

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

Yes [ X ]

No [ ]

Minnesota Public Radio



Thomas J Kigin, Executive Vice President

10-29-02  
Date

February 21, 2002

William Caton, Acting Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, NE  
Suite 110  
Washington, DC 20002

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WMLS FM, Grand Marais, MN  
Facility ID No. 92306  
Minnesota Public Radio  
Request for Extension of Special Temporary Authority

WLSN FM, Grand Marais, MN  
Facility ID No. 92302  
Minnesota Public Radio  
Request for Special Temporary Authority

Dear Mr Caton:

On behalf of Minnesota Public Radio ("MPR"), holder of construction permits for WMLS- FM, Grand Marais, MN, and of WLSN-FM of Grand Marais, MN, this is to request Special Temporary Authority to operate at variance from the stations' construction permit parameters due to a variety of technical problems described below.

The original construction permit for WMLS -FM was issued June 16, 2000, FCC Permit File Number BPED-19981208MI. The original construction permit for WLSN - FM was issued June 9, 2000, FCC Permit File Number BPED-19981204MB. Thus, the construction permits in question expire June 16, 2003 and June 9, 2003 respectively.

By separate letters for each station dated September 13, 2001, MPR advised the Commission that it expected to begin program tests on or about September 17, 2001. In separate letters for each station, in letters dated September 26, 2001, October 25, 2001, November 26, 2001 and February 7, 2002 (copies attached) MPR advised the Commission that it had begun program tests, but was experiencing technical difficulties since commencing operations and is operating both stations at substantially reduced power.

The tower on which the WMLS and WSLN transmitters were built on is owned by another party, who completed construction of the tower just days before MPR began program tests of WMLS and WSLN.

The WMLS/WSLN antenna is mounted on a tower that is also used to house translators for TV channels 3, 6, and 8. These translators receive their signals through a diamond-quad Yagi antenna array from Duluth, Minnesota, which is located 110 miles south of Grand Marais. Because of the extreme distance involved, these off the air signals are extremely low in level. These signals are also used to feed a local cable TV system. The diamond-quad antenna is located 50 feet below the WMLS/WSLN antenna.

When the WMLS and WSLN transmitters were put on the air in September, 2001, it was found that there was moderate to severe interference caused to the channel 6 translator receive signal; the other TV signals were not affected. Extensive testing revealed that there were several causes of the interference to channel 6, the primary one being poor tower grounding and poor or no bonding of tower sections. The WMLS/WSLN broadcast antenna was found to have been installed without being grounded to the tower, and the diamond-quad off air pickup antenna was also found to be ungrounded.

On the 20<sup>th</sup> of November, 2001, both the WMLS and the WSLN transmitters were turned on and operated at a TPO such that they were each producing their authorized ERP of 6 Kilowatts. The two stations were operated at this power level for several hours. During that period coverage area was verified, as was the stability of the broadband antenna and transmitter combiner. Both transmitters were found to be operating very close to factory test specifications for their TPO. Also, both transmitters were thoroughly tested for the presence of intermodulation products and second harmonics; the combiner output was found to be very clean with both intermodulation products and harmonics better than 100 dB below carrier levels.

At MPR's expense, a multi cavity filter was installed on the off air pickup antenna's downlead, and a tower crew was hired to properly bond the WMLS/WSLN antenna to the tower, and to bond several of the tower sections together. These actions drastically improved the channel 6 reception, but it was then found that the diamond-quad receive antenna was itself generating an intermodulation product that fell on the channel 6 aural carrier frequency. At present, MPR is waiting for the tower owner to have this antenna repaired. When this antenna is repaired, the WMLS/WSLN stations should be able to operate at full power. As an accommodation to the licensee of the channel 6 translator, MPR is continuing to temporarily operate WMLS and WSLN at reduced power.

MPR therefore respectfully requests Special Temporary Authority for WMLS and WSLN to continue program tests at substantially reduced power for another six (6) months.

William Caton  
February 21, 2002  
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Because MPR is a noncommercial, educational licensee, no filing fee is required with this request. An Anti-Drug Abuse Act Certification form is attached.

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

Sincerely,

A handwritten signature in cursive script that reads "Mitzi T Gramling".

Mitzi T Gramling  
Associate General Counsel

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