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March 14, 2005

By Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
236 Massachusetts Ave., NE
Suite 110
Washington, DC 20002

RECEIVED

MAR 14 2005

Federal Communications Commission
Office of Secretary

**Re: Public Notice DA 05-506, released February 28, 2005
Report No. AUC-05-81-C
Request for Removal from MX Group 214 in LPTV Auction 81**

Dear Madam Secretary:

On behalf of our client, Federated Rural Electric Association ("FREA"), this is to request that its application (File No. **BMJPTTL-20000821AHA**) for Channel 45, Jackson, Minnesota (the "Application"), be removed from MX Group 214 in Low Power Television Auction 81. In support hereof, the following is shown:

FREA's Application is among two applicants identified in MX Group 214 in Attachment A to Report No. AUC-05-81-C, Public Notice DA 05-506, released February 28, 2005. However, on August 23, 2001, FREA timely filed an amendment to the Application (the "Amendment") which was designed to remove FREA's Application from Auction 81. Therein, FREA demonstrated that its proposed facilities would not cause interference to any other proposed facility in its MX Group (which, at that time, was Group No. M286). In addition, FREA committed to accepting interference from any application filed on or before August 31, 2000.¹

Undersigned counsel has no knowledge of any disposition of FREA's Amendment by the Commission's staff. Accordingly, this is to request that FREA's Amendment be reviewed and processed, and that in light of the Amendment, FREA's Application be removed from Auction 81 and be processed as a singleton.

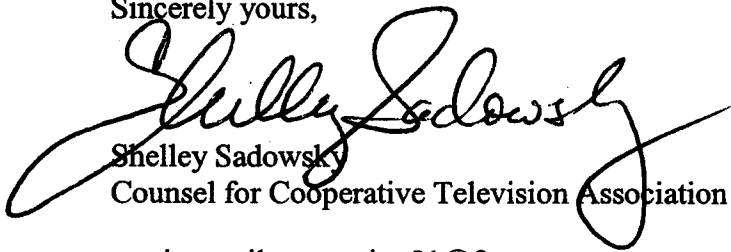
¹ A date-stamped copy of FREA's August 23, 2001 Amendment is attached hereto for the staff's reference.

Federal Communications Commission
March 14, 2005
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Should the Commission staff desire any additional information concerning this matter, please contact the undersigned.

Sincerely yours,



Shelley Sadowsky
Counsel for Cooperative Television Association of Southern Minnesota

cc via email to: auction81@fcc.gov

Shaun Maher, Esq.

Lynne Milne, Esq.

Hossein Hashmezadeh

cc via fax to: 202-418-2827

August 23, 2001

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By Hand

Magalie Roman Salas, Secretary
Federal Communications Commission
Washington, DC 20554

SHELLEY SADOWSKY
SPECIAL COUNSEL
202-216-4650

E-MAIL ADDRESS
SSADOWSKY@ROSENMAN.COM

Re: **File No. BMJPTTL-20000821AHA**
Federated Rural Electric Association
K45EH, Jackson, MN; Facility I.D. 21282
Amendment to Remove Mutual Exclusivity w/ MX Group
M286

RECEIVED

AUG 23 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

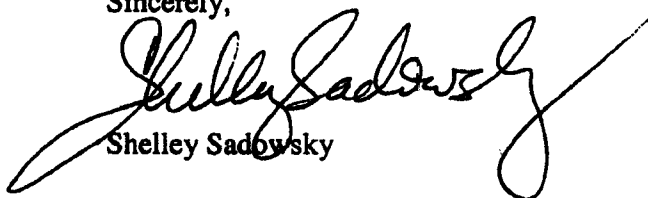
Dear Ms. Salas:

On behalf of our client, Federated Rural Electric Association ("FREA"), licensee of Low Power Television Station K45EH, Jackson, Minnesota, I submit herewith an original and four copies of an amendment to FREA's above-referenced pending application for major modification of the facilities of K45EH.

FREA's application was listed among the mutually exclusive applications in MX Group M286 in Attachment A to Public Notice DA 01-1289, released May 25, 2001. However, as the attached amendment provides, FREA will accept interference from any other LPTV application that was filed on or before August 31, 2000. In addition, the amendment demonstrates that FREA's proposed facility will not cause interference to any other facility listed in MX Group M286. Accordingly, it is respectfully requested that FREA's application be removed from MX Group M286 and granted.

Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,



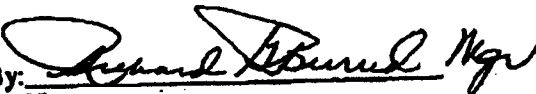
Shelley Sadowsky

cc: Shaun Maher, Esquire, Video Services Div., Mass Media Bur. (by hand)

AMENDMENT

The application (File No. ~~BMJPTTL-2000021AHA~~) of **FEDERATED RURAL ELECTRIC ASSOCIATION** for major modification of the license for low power television station **K45EH**, Jackson, Minnesota (Facility ID. No. 21282) is hereby amended by the materials attached hereto.

FEDERATED RURAL ELECTRIC ASSOCIATION

By: 

Name: Richard G. Burud
Title: General Manager

Date: August 22, 2001

51022735.01

**ENGINEERING STATEMENT
IN SUPPORT OF MINOR AMENDMENT
TO APPLICATION FOR CONSTRUCTION PERMIT
FEDERATED RURAL ELECTRIC ASSOCIATION
CHANNEL 45+ JACKSON, MINNESOTA BNPTTL-20000821AHA**

AUGUST 2001

The following engineering statement has been prepared on behalf of **Federated Rural Electric Association ("FREA")**, applicant for an improved LPTV facility at Jackson, Minnesota, as specified in FCC File Number BNPTTL-20000821AHA. FREA herein amends its application to accept interference from any application filed on/or before August 31, 2000 and demonstrates in Table I, attached, that the proposed facility will cause no interference to any other facility in Group M286.

The proposed Channel 45+ K45EH operation, with the facilities specified in *FCC Form 346, Section III* now on file, has been prepared utilizing the allocation standards adopted in the Report and Order in MM Docket No. 00-10, "Establishment of a Class A Television Service" released April 4, 2000. Every effort has been made to protect other facilities on the basis of the contour overlap Rules. In these circumstances, the printout of stations studied (pages 3 and 4 of this Amendment) shows clear in the status column. In cases where the station studied was involved in contour overlap, an interference analysis using OET 69 type analysis procedures was employed. The status column indicates clean when the interference analysis method is used and confirmation of the lack of interference is made by comparing the total population column to the new population column to confirm that no reduction in population is associated with the proposal to any NTSC facility and that population in the interference to DTV facilities is less than the 0.5% de minimis rounding standard

OET 69 analysis was made in the cases described below and a waiver of the appropriate contour overlap or interference rules in herein requested as stipulated in paragraph 74 of the R & O.

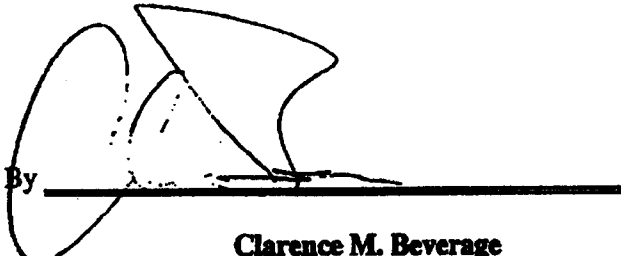
A waiver of *Section 74.707* is requested with regard to the following application:

Channel 45 W. Central Minn. ETV Comp. Inc. BNPTTL-20000831BSC

The waiver sought with regard to the above application is to utilize OET 69 analysis. In the unlikely event that operation of the proposed facilities results in actual impermissible interference, such interference will be remedied pursuant to *Section 74.703(b)* of the Commission's Rules.

Based on the data submitted herein, it is believed that the application is ready for grant and should be removed from MX Group M286.

The foregoing was prepared on behalf of **Federated Rural Electric Association** by **Clarence M. Beverage of Communications Technologies, Inc.**, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By 
Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

SUBSCRIBED AND SWORN TO before me,

this 21st day of August, 2001,

Esther G. Sperbeck, NOTARY PUBLIC

ESTHER G. SPERBECK
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT 15, 2002

Callign City	Class	Status	ERP	Sep Typ	Status	Dist	Prot	Clearance/D	Ex Gain	Zone	Band	Ch#	Adj	Matrix	Svc Con	Stre	Com	Int	Str	Old Pop	New Pop
EMMETT	LPTV	APP	3.000	C/M	Clear	50.3		8.6	0.0	0	JHF	45 Z	Co	LR	F(50,50)74	F(50,10)46			N/C	N/C	N/C
950630N	LINC/LNTSC	APP	2400.00	C/M	Clear	359.7		211.2	0.0	2	JHF	45 Z	Co	LR	F(50,50)64	F(50,10)36			N/C	N/C	N/C
951106N	LINC/LNTSC	APP	5000.00	C/M	Clear	357.6		194.8	0.0	2	JHF	45 Z	Co	LR	F(50,50)64	F(50,10)36			N/C	N/C	N/C
951106N	LINC/LNTSC	APP	5000.00	C/M	Clear	362.7		190.1	0.0	2	JHF	45 Z	Co	LR	F(50,50)64	F(50,10)36			N/C	N/C	N/C
951107N	LINC/LNTSC	APP	1580.00	C/M	Clear	361.4		217.7	0.0	2	JHF	45 Z	Co	LR	F(50,50)64	F(50,10)36			N/C	N/C	N/C
960722N	RICHLANTSC	APP	5000.00	C/M	Clear	413.5		259.1	0.0	1	JHF	45 Z	Co	LR	F(50,50)64	F(50,10)36			N/C	N/C	N/C
X15CE	REDWOODTV	CP	1.487	C/M	Clear	105.7		93.4	0.0	0	JHF	46 +	A+1	LR	F(50,50)74	F(50,10)89			N/C	N/C	N/C
X30FN	ST. JAMES LPTV	CP	12.300	C/M	Clear	64.5		31.4	0.0	0	JHF	30 +	T-15	LR	F(50,50)74	F(50,10)80			N/C	N/C	N/C
X33CT	OLIVIA LPTV	CP	0.990	C/M	Clear	128.9		72.8	0.0	0	JHF	45 -	Co	LR	F(50,50)74	F(50,10)46			N/C	N/C	N/C
X44AD	ST. JAMES LPTV	LIC	1.350	C/M	Clear	64.4		48.9	0.0	0	JHF	44 -	A-1	LR	F(50,50)74	F(50,10)89			N/C	N/C	N/C
X44AD	ST. JAMES LPTV	APP	2.000	C/M	Clear	64.4		49.3	0.0	0	JHF	44 -	A-1	LR	F(50,50)74	F(50,10)89			N/C	N/C	N/C
X45AR	EAGLE BLPTV	LIC	14.000	C/M	Clear	285.0		220.9	0.0	0	JHF	45 -	Co	LR	F(50,50)74	F(50,10)46			N/C	N/C	N/C
X45CQ	COUNCIL LPTV	LIC	11.300	C/M	Clear	270.2		155.6	0.0	0	JHF	45 +	Co	LR	F(50,50)74	F(50,10)29			N/C	N/C	N/C
X45DF	AUSTIN LPTV	LIC	1.470	C/M	Clear	148.6		88.0	0.0	0	JHF	45 -	Co	LR	F(50,50)74	F(50,10)46			N/C	N/C	N/C
X45DJ	GRANT LPTV	LIC	1.450	C/M	Clear	141.5		31.4	0.0	0	JHF	45 +	Co	LR	F(50,50)74	F(50,10)29			N/C	N/C	N/C
X45DP	DONNELL LPTV	LIC	1.290	C/M	Clear	250.3		194.4	0.0	0	JHF	45 Z	Co	LR	F(50,50)74	F(50,10)46			N/C	N/C	N/C
X45EF	IONIA FA LPTV	CP MOD	1.610	C/M	Clear	187.8		88.0	0.0	0	JHF	45 +	Co	LR	F(50,50)74	F(50,10)29			N/C	N/C	N/C
X45EH	JACKSON LPTV	LIC	1.800	C/M	Callign	0.0		0.0	0.0	0	JHF	45 +	Co	LR	F(50,50)74	F(50,10)29			N/C	N/C	N/C
X45EH	JACKSON LPTV	APP	3.000	C/M	Callign	0.0		0.0	0.0	0	JHF	45 +	Co	LR	F(50,50)74	F(50,10)29			N/C	N/C	N/C
X46AA	ST. JAMES LPTV	LIC	1.370	C/M	Clear	64.4		48.8	0.0	0	JHF	46 -	A+1	LR	F(50,50)74	F(50,10)89			N/C	N/C	N/C
XDAO-L	MARSHAL LPTV	LIC	2.970	C/M	Clear	239.8		184.1	0.0	0	JHF	45 -	Co	LR	F(50,50)74	F(50,10)46			N/C	N/C	N/C
XDLT-T	SILOUX FM/SC	CP MOD	3980.00	C/M	Clear	126.5		17.1	0.0	2	JHF	46 Z	A+1	LR	F(50,50)64	F(50,10)79			N/C	N/C	N/C
XDLT-T	SILOUX FM/SC	APP	4000.00	C/M	Clear	126.5		16.9	0.0	2	JHF	46 Z	A+1	LR	F(50,50)64	F(50,10)79			N/C	N/C	N/C
XDLT-T	SILOUX FM/SC	LIC	4000.00	C/M	Clear	126.5		17.0	0.0	2	JHF	46 +	A+1	LR	F(50,50)64	F(50,10)79			N/C	N/C	N/C
XIIN*	IONIA CDTV	USED	4922.300	C/M	Clear	364.5		115.0	10.0	2	JHF	45	Co	LR	F(50,90)42	F(50,10)21			N/C	N/C	N/C
XIIN-D	IONIA CDTV	CP	922.300	C/M	Clear	364.5		116.2	10.0	2	JHF	45	Co	LR	F(50,90)42	F(50,10)21			N/C	N/C	N/C
XMTV*	OMAHA DTV	USED	41000.00	C/M	Clear	269.0		21.6	10.0	2	JHF	45	Co	LR	F(50,90)42	F(50,10)21			N/C	N/C	N/C
XMTV-D	OMAHA DTV	CP	10000.00	C/M	Clear	269.0		20.7	10.0	2	JHF	45	Co	LR	F(50,90)42	F(50,10)21			N/C	N/C	N/C
XKWF	REDWOOD TV	LIC	1230.00	D/N	N/C	105.7	32	73.7	0.0	2	JHF	43 Z	T-2	LR	F(50,50)64				N/C	N/C	N/C
XSTC-T	MINNEAPNTSC	LIC	5000.00	C/M	Clear	219.1		83.7	0.0	2	JHF	45 Z	Co	LR	F(50,50)64	F(50,10)36			N/C	N/C	N/C
XLLT-D	ROCHESDTV	CP	1000.00	C/M	Clear	198.5		86.4	10.0	2	JHF	46	A+1	LR	F(50,90)42	F(50,10)80			N/C	N/C	N/C

NEW	EMMETT LFTV	APP	1,000	C/M	Clear	50.3	-	9.6	28	0.0	5.0	0	LHF	45 Z	Co	LR	F(50,50)74	F(50,10)46	N/C	N/C	N/C
NEW	ESTHER LFTV	APP	1,000	C/M	Clear	28.1	-	15.9	-13	0.0	5.0	0	LHF	44 -	A-1	LR	F(50,50)74	F(50,10)99	N/C	N/C	N/C
NEW	ROCKWELL LFTV	APP	3,000	C/M	Clear	124.2	-	113.7	-3	0.0	5.0	0	LHF	48 -	A+1	LR	F(50,50)74	F(50,10)99	N/C	N/C	N/C
NEW	APPLETON LFTV	APP	0,700	C/M	Clear	192.6	-	139.6	28	0.0	5.0	0	LHF	45 -	Co	LR	F(50,50)74	F(50,10)46	N/C	N/C	N/C
NEW	FROST LFTV	APP	7,000	C/M	Clear	85.6	-	-33.0	45	0.0	5.0	0	LHF	45 +	Co	LR	F(50,50)74	F(50,10)29	0.0%	0.0%	1286
NEW	WATER LFTV	APP	11,900	C/M	Clear	219.8	-	166.7	28	0.0	5.0	0	LHF	45 -	Co	LR	F(50,50)74	F(50,10)46	N/C	N/C	N/C
NEW	CHIPPEL LFTV	APP	1,000	C/M	Clear	320.3	-	212.0	45	0.0	5.0	0	LHF	45 +	Co	LR	F(50,50)74	F(50,10)29	N/C	N/C	N/C