

ANN BAVENDER*
JOHN C. BUTCHER*
HARRY F. COLE
ANNE GOODWIN CRUMP
VINCENT J. CURTIS, JR.
PAUL J. FELDMAN
FRANK R. JAZZO
M. SCOTT JOHNSON*
MITCHELL LAZARUS
STEPHEN T. LOVELADY*
SUSAN A. MARSHALL
HARRY C. MARTIN
ALISON J. MILLER
LEE G. PETRO*
RAYMOND J. QUIANZON
MICHAEL W. RICHARDS*
JAMES P. RILEY
KATHLEEN VICTORY
HOWARD M. WEISS

* NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ARLINGTON, VIRGINIA 22209-3801

OFFICE: (703) 812-0400

FAX: (703) 812-0486

www.fhhlaw.com

RETIRED MEMBERS
RICHARD HILDRETH
GEORGE PETRUTSAS

CONSULTANT FOR INTERNATIONAL AND
INTERGOVERNMENTAL AFFAIRS
SHELDON J. KRYS
U. S. AMBASSADOR (ret.)

OF COUNSEL
DONALD J. EVANS
FRANCISCO R. MONTERO
EDWARD S. O'NEILL*
ROBERT M. GURSS*
EUGENE M. LAWSON, JR.

WRITER'S DIRECT

(703) 812-0415
martin@fhhlaw.com

March 15, 2005

BY HAND

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, SW, Room TWB204
Washington, D.C. 20554

**Re: Auction No. 81
West Central Minnesota Educational Television Company
File No. BNPTTL-20000831BSC
MX Group 214
Facility ID No. 129304**

Dear Ms. Dortch:

On behalf of West Central Minnesota Educational Television Company ("West Central"), applicant for a construction permit for a new LPTV station at Frost, Minnesota, this is to request that its above-referenced application be removed from Attachment A (page 17) of the Commission's *Public Notice*, DA 05-506 (released February 28, 2005) in this auction proceeding.

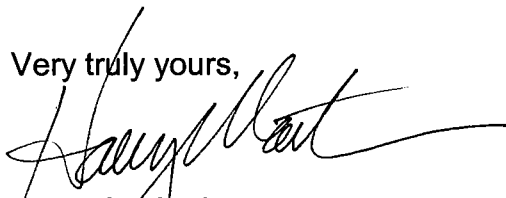
West Central's original application was mutually exclusive with the application of Federated Rural Electric Association for changes to K45EH, Jackson, Minnesota (File No. BMJPTTL-20000821AHA), and another application. However, West Central amended its application on March 5, 2004 to remove these conflicts. A copy of the amendment, and a CDBS printout verifying the filing date, are attached hereto. This amendment was timely filed in response to the Commission's Auction No. 81 settlement window *Public Notice*, DA 03-3881 (released December 5, 2003).

Ms. Marlene H. Dortch
March 15, 2005
Page 2

In light of the resolution of the mutual exclusivity between West Central's application and the other application included in MX Group 214, it is respectfully requested that West Central's application be removed from the Auction No. 81 proceeding and placed on the next "grant list" to be published by the FCC's staff.

Should any question arise concerning this matter, please communicate with the undersigned.

Very truly yours,



Harry C. Martin
Counsel for
West Central Minnesota Educational
Television Company.

HCM:jpg

cc: Auction 81 Mailbox (auction81@fcc.gov)
Mr. Shaun A. Maher (via fax 202-418-2827)



Application Search Details

File Number: BNPTTL-20000831BSC
Call Sign: NEW
Facility Id: 129304
FRN: 0005849286
Applicant Name: WEST CENTRAL MINNESOTA EDUCATIONAL
TELEVISION COMPANY, INC.
Frequency:
Channel: 45
Community of License: FROST, MN
Application Type: ORIGINAL CONSTRUCTION PERMIT
Status: SUPERSEDED
Status Date: 02/07/2005
Expiration Date:
Tolling Code:
Application Service: TX
Disposed Date: 02/07/2005
Accepted Date:
Tendered Date: 03/08/2004
Amendment Received Date: 03/05/2004
Last Public Notice:
Last Report Number:
Authorization Authorization not available
Engineering Data [View Engineering Data](#)
Legal Actions [View Legal Actions](#)
PN Comment [Public Notice Comment](#)

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.											
2. Parties to the Application. List the applicant and all parties to the application. If other than natural persons, list officers, directors, stockholders with interests of 1% or more, general and limited partners and/or members.											
a. Name and address of the applicant and, if applicable, its officers, directors, stockholders with interests of 1% or greater, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter remaining stockholders and partners.	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 20px; text-align: center; vertical-align: top;">b.</td> <td>Citizenship.</td> </tr> <tr> <td style="text-align: center; vertical-align: top;">c.</td> <td>Positional Interest: Officer, director, general partner, limited partner, LLC member, etc.</td> </tr> <tr> <td style="text-align: center; vertical-align: top;">d.</td> <td>Percentage of votes.</td> </tr> <tr> <td style="text-align: center; vertical-align: top;">e.</td> <td>Percentage of equity.</td> </tr> </table>	b.	Citizenship.	c.	Positional Interest: Officer, director, general partner, limited partner, LLC member, etc.	d.	Percentage of votes.	e.	Percentage of equity.		
b.	Citizenship.										
c.	Positional Interest: Officer, director, general partner, limited partner, LLC member, etc.										
d.	Percentage of votes.										
e.	Percentage of equity.										
[Enter Parties Information]											
Parties to the Application											
Parties to the Application. List the applicant and all parties to the application. If other than natural persons, list officers, directors, stockholders with interests of 1% or more, general and limited partners and/or members.											
a. Name and address of the applicant and, if applicable, its officers, directors, stockholders with interests of 1% or greater, or partners (if other than individual also show name, address, and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners. b. Citizenship. c. Positional Interest: Officer, director, general partner, limited partner, LLC member, etc. d. Percentage of votes. e. Percentage of equity.											
<table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 45%;">(a) Name and Address</th> <th style="width: 10%;">(b) Citizenship</th> <th style="width: 15%;">(c) Positional Interest</th> <th style="width: 10%;">(d) Percentage of Votes</th> <th style="width: 10%;">(e) Percentage of Equity</th> </tr> </thead> <tbody> <tr> <td>NAMES OF OFFICERS AND DIRECTORS ON FILE IN CP APP.</td> <td>US</td> <td>OFFICERS AND DIRECTORS</td> <td>100</td> <td>100</td> </tr> </tbody> </table>		(a) Name and Address	(b) Citizenship	(c) Positional Interest	(d) Percentage of Votes	(e) Percentage of Equity	NAMES OF OFFICERS AND DIRECTORS ON FILE IN CP APP.	US	OFFICERS AND DIRECTORS	100	100
(a) Name and Address	(b) Citizenship	(c) Positional Interest	(d) Percentage of Votes	(e) Percentage of Equity							
NAMES OF OFFICERS AND DIRECTORS ON FILE IN CP APP.	US	OFFICERS AND DIRECTORS	100	100							
3. Character Issues. Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 2]										
a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or b. any pending broadcast application in which character issues have been raised.											
4. Adverse Findings. Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 3]										
5. 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 4]										

6.	Program Service Certification. (For Low Power Television Applicants Only) Applicant certifies that this station will offer a broadcast program service.	<input checked="" type="radio"/> Yes <input type="radio"/> No
7.	Local Public Notice. (For new station and major change Applicants Only) Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.	<input checked="" type="radio"/> Yes <input type="radio"/> No
8.	Rebroadcast Certification. (For Applicants proposing translator rebroadcasts that are not the licensee of the primary station) Applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted.	<input type="radio"/> Yes <input type="radio"/> No
9.	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
		[Exhibit 5]
10.	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

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 GLEN CERNY	Typed or Printed Title of Person Signing PRESIDENT
Signature	Date 3/5/2004

SECTION III - ENGINEERING DATA							
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 Number:	45					
2.	Frequency Offset:	<input type="radio"/> No offset <input type="radio"/> Zero offset <input checked="" type="radio"/> Plus offset <input type="radio"/> Minus offset					
3.	Translator Input Channel No. :						
4.	Primary station proposed to be rebroadcast:	<table border="1"> <tr> <td>Call Sign</td> <td>City</td> <td>State</td> <td>Channel</td> </tr> </table>		Call Sign	City	State	Channel
Call Sign	City	State	Channel				
5.	Antenna Location Coordinates: (NAD 27)	Latitude: Degrees 43 Minutes 35 Seconds 9 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 93 Minutes 55 Seconds 46 <input checked="" type="radio"/> West <input type="radio"/> East					
6.	Antenna Structure Registration Number: 1024302	<input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA					
7.	Antenna Location Site Elevation Above Mean Sea Level:	344.4 meters					
8.	Overall Tower Height Above Ground Level:	92.9 meters					
9.	Height of Radiation Center Above Ground Level:	82 meters					

10.	Maximum Effective Radiated Power (ERP) Towards Radio Horizon:	7 kW
11.	Maximum ERP in any Horizontal and Vertical Angle:	7 kW
12.	Transmitting Antenna: Before selecting Directional "Off-the-Shelf", refer to "Search for Antenna Information" under CDBS Public Access (http://svartifoss2.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 type="radio"/> Nondirectional <input type="radio"/> Directional "Off-the-shelf" <input checked="" type="radio"/> Directional composite Manufacturer AND Model ALP8L1-HSEC-45	

Directional Antenna Relative Field Values: <input type="checkbox"/> N/A (Nondirectional or Directional "Off-the-shelf") Rotation (Degrees): 0 <input type="checkbox"/> No Rotation											
Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
0	0.597	10	0.687	20	0.758	30	0.826	40	0.89	50	0.944
60	0.979	70	0.996	80	0.999	90	0.999	100	0.999	110	1
120	0.999	130	0.999	140	0.999	150	0.996	160	0.979	170	0.944
180	0.89	190	0.826	200	0.758	210	0.687	220	0.597	230	0.476
240	0.34	250	0.229	260	0.188	270	0.222	280	0.287	290	0.322
300	0.287	310	0.222	320	0.188	330	0.229	340	0.34	350	0.476
Additional Azimuths											

Relative Field Polar Plot

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.

CERTIFICATION

13.	Interference : The proposed facility complies with all of the following applicable rule sections. Check all those that apply. TV broadcast analog system protection. a. <input type="checkbox"/> 47 C.F.R. Section 74.705 Digital TV station protection. b. <input type="checkbox"/> 47 C.F.R. Section 74.706 Low Power TV and TV translator station protection. c. <input checked="" type="checkbox"/> 47 C.F.R. Section 74.707	<input type="radio"/> Yes <input checked="" type="radio"/> No See Explanation in [Exhibit 6]
-----	--	---

14.	Environmental Protection Act. 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 RF compliance, an Exhibit is required. By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 7]
-----	---	---

PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.

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 WAYNE S. REESE		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date 3/5/2004	
Mailing Address PO BOX 220 385 AIRPORT DRIVE			
City COLDWATER		State or Country (if foreign address) MI	Zip Code 49036 - 0220
Telephone Number (include area code) 5172787339		E-Mail Address (if available) WAYNE@MUNN-REESE.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).

Exhibits

Exhibit 1

Description: EXPLANATION OF AMENDMENT

THIS AMENDMENT IS BEING FILED IN RESPONSE TO PUBLIC NOTICE DA 03-3881. THIS AMENDMENT SUBSTITUTES A NEW ALLOCATION STUDY IN EXHIBIT 6 AND RF RADIATION STUDY IN EXHIBIT 7. A SLIGHTLY DIFFERENT ANTENNA PATTERN HAS BEEN EMPLOYED.

Attachment 1

Exhibit 6

Description: ALLOCATION STUDY -SEE DISCUSSION IN THIS EXHIBIT

THE ATTACHED DOCUMENTS FORM AN ALLOCATION STUDY THAT IS BEING SUBSTITUTED FOR THE ONE THAT WAS INCLUDED IN THE ORIGINAL PAPER FILING.

Attachment 6

Description
<u>Exhibit 6.0 - Allocation Discussion</u>
<u>Exhibit 6.1 - Allocation Tabulation</u>
<u>Exhibit 6.2 - Allocation Contour Map</u>
<u>Exhibit 6.3 - Received Overlap Map</u>

Exhibit 6.4 - Channel 30 Service Areas

Exhibit 7

Description: COMPLIANCE WITH RADIOFREQUENCY RADIATION GUIDELINES

REVISED RF RADIATION STUDY

Attachment 7

Description
Exhibit 7 - RF Radiation Study

EXHIBIT 6.0

The instant amendment seeks to extricate the proposed LPTV facility from Group M286 of mutually exclusive applications for the upcoming Auction No. 81. This group includes the instant application and two other applications from existing LPTV licensees. One application is for K45EH¹ at Jackson, MN, and the other application is for K60FY² at Frost, MN. Each of these applications requests a modest power increase.

The facility requested in the instant application, File No. BNPTTL-20000831BSC, does not cause prohibited contour overlap to any other authorized or proposed facility. *Exhibit 6.1* is a Tabulation of Allocation Spacing that shows contour clearance with all other stations in the allocation, including the licensed and proposed operations of K45EH.

Exhibit 6.2 is an allocation contour map. The protected contours of the three closest facilities—K45DH at Austin, MN; KSTC-TV at Minneapolis-St. Paul, MN; and the K45EH application at Jackson, MN—are shown. Also shown are the proposed interference contours that correspond to each of the protected contours. The contours have been color coded to aid in identification. A single, red interference contour is shown for both the licensed and proposed protected contours of K45EH.

The proposed facility does receive contour overlap from K45EH. *Exhibit 6.3* is a map showing the service and interference contours for the proposed LPTV facility at Frost, MN, as well as the licensed and proposed contours for K45EH. Inspection of this map will show that the interference contour proposed in the instant application does not overlap the authorized or proposed service contour of K45EH. In contrast, both the authorized and proposed K45EH interference contours completely overlap the proposed Frost service contour. Normally, this would not preclude a grant of the Frost application because LPTV facilities are allowed to receive, but not give, contour overlap. However, in the present proceeding, multiple applications were filed, and one station's "received" overlap becomes another station's "given" overlap. Thus, the instant application has become mutually exclusive with the K45EH application. In an effort to resolve this mutual exclusivity, *the applicant states that it is willing to receive either the authorized or proposed contour overlap from K45EH* and requests that this factor not preclude a grant of either application.

The mutual exclusivity with K60FY is a result of §74.707(d)(5). This rule prohibits K60FY from placing an 80 dBu contour across or within the 74 dBu contour of the proposed Channel 45 facility. However, nothing in this section of the rules prevents the Channel 45 station from moving next to the station on Channel 60. Thus, the application by K60FY does not preclude a grant of the instant application, but the instant application precludes a grant of the K60FY application. Since the two facilities have applied for use of the same tower, there is no way to eliminate the prohibited contour overlap.

¹ File No. BMJPTTL-20000821AHA, Facility ID #: 21282

² File No. BMJPTTL-20000821AHC, Facility ID #: 5897

Table II of §73.698 labels this 15 channel taboo as the "picture image" taboo. Thus, the purpose of the prohibition in §74.707(d)(5) is to prevent interference to the video information of stations operating on Channel 30, which is the image of Channel 60 when mixed with Channel 45. A search was made for all Channel 30 stations within 200 km of the proposed LPTV site. *Exhibit 6.4* shows the small area formed by the overlap of the service contour proposed in the instant application and the proposed K60FY 80 dBu interference contour. Also shown on this map are the relevant service contours for each of the Channel 30 facilities that were found in the search. The contour shown for the vacant NTSC allotment (AL614) represents the contour that would result from an omni-directional antenna operating with 5,000 kW of effective radiated power mounted 600 meters above average terrain. Inspection of the map will show that the proposed prohibited contour overlap area, where interference to Channel 30 might be expected to occur, lies completely outside the service area of any Channel 30 facility. *Therefore, the applicant requests that §74.707(d)(5) be waived for both the instant application and the K60FY application since no actual interference will result from a grant of these two applications.*

The willingness of the applicant to accept interference from K45EH, combined with a waiver of §74.707(d)(5), will allow the mutual exclusivity to be resolved for all three applicants in Group M286. The applicant requests all three applications be given "singleton" status. A timely grant of these applications will not result in any new interference to existing viewers and will allow increased service to the public in this sparsely populated area without further delay.

Exhibit 6.1

Allocation Tabulation
Channel 45 - Frost MN

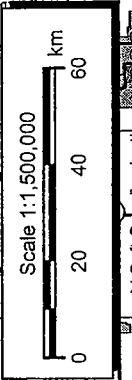
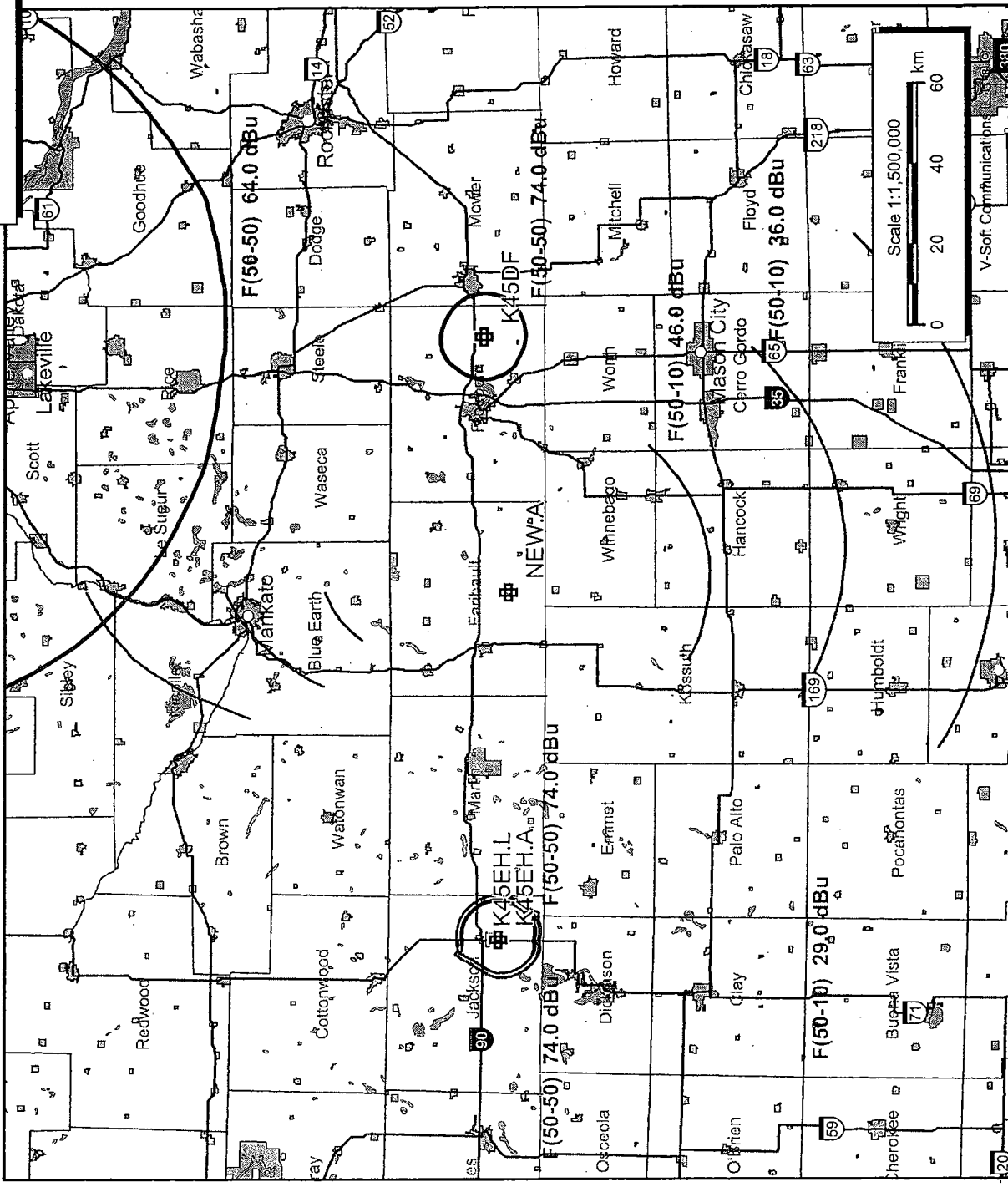
REFERENCE							DISPLAY DATES
43 35 09 N	LPTV Pwr = 7 kW, HAMS L COR= 426 M						DATA 02-28-04
93 55 46 W							SEARCH 03-04-04
..... Channel 45+, 656 MHz							
Call	Channel	Location	Dist	Azi	FCC	Margin	
N. Lat.	W. Lng.		Power	HAAT			
NEW	AP 45+	Frost	MN	0.00	0.0	> 141.82	-141.82
43 35 09	93 55 46	DXN	7.000 kW		98 M		
	West Central Minnesota Edu		BNPTTL20000831BSC				
K45DF*	LI 45-	Austin	MN	63.44	84.4	> 062.75	0.69
43 38 18	93 08 49	XN	1.470 kW		144 M		
	Television Systems Of Minnes		BLTTL19920313JF				
KSTCTV*LI	45Z	Minneapolis-st.	MN	175.78	20.7	> 173.60	2.18
45 03 45	93 08 21	VY	5000.000 kW		433 M		
	Kstc.tv, Llc		BLCT20020318AAJ				
K45EH*	AP 45+	Jackson	MN	85.87	271.7	> 077.78	8.09
43 36 12	94 59 33	XN	3.000 kW		108 M		
	Federated Rural Electric A		BMJPTTL20000821AHA				
KXLT-D*CP	46	Rochester	MN	113.44	86.3	> 104.80	9.34
43 38 34	92 31 35	DTY	923.908 kW		329 M		
	Shockley Broadcasting, Llc		BPCDT19991026ABN				
K45EH*	LI 45+	Jackson	MN	85.87	271.7	> 076.51	9.36
43 36 12	94 59 33	XN	1.800 kW		108 M		
	Federated Rural Electric A		BLTTL19950314IL				
KIINTV*ALD	45	IOWA CITY	IA	296.56	133.5	> 279.30	17.28
41 43 15	91 20 30	D	920.456 kW		416 M		
			BMLET900918KE				
KMTV-D CP	45	Omaha	NE	306.37	214.9	> 288.38	17.99
41 18 25	96 01 37	TY	1000.000 kW		426 M		
	Emmis Television License C		BPCDT19991026ABT				
KIIN-D*CP	45	Iowa City	IA	296.56	133.5	> 278.31	18.25
41 43 15	91 20 30	TY	922.300 kW		405 M		
	Iowa Public Broadcasting B		BPEDT20000406AAQ				
K45GV CP	45Z	Emmettsburg	IA	80.32	229.2	> 061.84	18.48
43 06 42	94 40 38	XN	1.000 kW		52 M		
	Dean M. Mosely		BNPTTL20000830AGZ				
KMTV	ALD 45	OMAHA	NE	306.36	214.9	> 287.71	18.65
41 18 25	96 01 37	D	1000.000 kW		418 M		
			BLCT2607				

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.		Power	HAAT		
KMTV-D ST	45	Omaha	NE 306.36	214.9	> 282.03	24.33
41 18 25	96 01 37	TN	700.000 kW	393 M		
		Emmis Television License C	BMDSTA20030327AIL			
KXLT-D ST	46	Rochester	MN 113.44	86.3	> 084.37	29.07
43 38 34	92 31 35	DTN	55.300 kW	343 M		
		Shockley Broadcasting, Llc	BDSTA20021009ABB			
KMTV-D ST	45	Omaha	NE 306.36	214.9	> 273.29	33.07
41 18 25	96 01 37	TN	250.000 kW	393 M		
		Emmis Television License C	BDSTA20030124AHB			
NEW AP	44+	Geneva	MN 57.43	63.1	> 020.42	37.01
43 49 03	93 17 33	DXN	8.000 kW	118 M		
		Three Angels Broadcasting	BNPTTL20000830BJP			
NEW AP	44+	Geneva	MN 57.43	63.1	> 020.42	37.01
43 49 03	93 17 33	DXN	8.000 kW	118 M		
		Three Angels Broadcasting	BNPTTL20000830BJP			
K45DJ LI	45+	Granite Falls	MN 189.11	316.4	> 139.20	49.91
44 48 17	95 34 49	XN	1.450 kW	135 M		
		Minnesota Valley Tv Improv	BLTTL19920529IC			
NEW AP	44Z	Austin	MN 75.41	82.0	> 022.96	52.45
43 40 35	93 00 12	DXN	10.000 kW	138 M		
		Pappas Telecasting Compani	BNPTTL20000829AEK			
K30FN LI	30+	St. James	MN 78.91	317.6	> 023.22	55.69
44 06 27	94 35 43	BN	12.300 kW	314 M		
		Cooperative Television Ass	BLTT19991102AAS			
K44AD AP	44-	St. James	MN 79.11	317.5	> 019.05	60.06
44 06 28	94 35 55	XN	2.000 kW	197 M		
		Cooperative Tv Assn. Of So	BMJPTTL20000821AHD			
KSTC-D CPM	44	Minneapolis	MN 175.78	20.7	> 114.50	61.28
45 03 45	93 08 21	TY	1000.000 kW	430 M		
		Kstc.tv, Llc	BMPCDT20020306ABH			
K46AA LI	46-	St. James	MN 79.11	317.5	> 017.82	61.29
44 06 28	94 35 55	XN	1.370 kW	197 M		
		Cooperative Tv Assn. Of So	BLTTL19970522JG			
K44AD LI	44-	St. James	MN 79.11	317.5	> 017.77	61.34
44 06 28	94 35 55	XN	1.350 kW	197 M		
		Cooperative Tv Assn. Of So	BLTTL19970507JN			
NEW AP	44-	Estherville	IA 76.53	252.8	> 014.96	61.57
43 22 46	94 49 55	XN	1.000 kW	131 M		
		Pappas Telecasting Compani	BNPTTL20000831ALK			

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.		Power	HAAT		
AL614	AL 30+	Carroll	IA 190.39	203.4	> 123.31	67.08
42 00 38	94 50 46	AN	5000.000 kW	600 M		
KXLTV	ALD 46	ROCHESTER	MN 133.26	66.9	> 065.44	67.82
44 02 39	92 23 56	D	50.000 kW	104 M		
			BLCT870821KH			

 * Actual radials antenna height and directional patterns used (if any)

Munn-Reese, Inc.

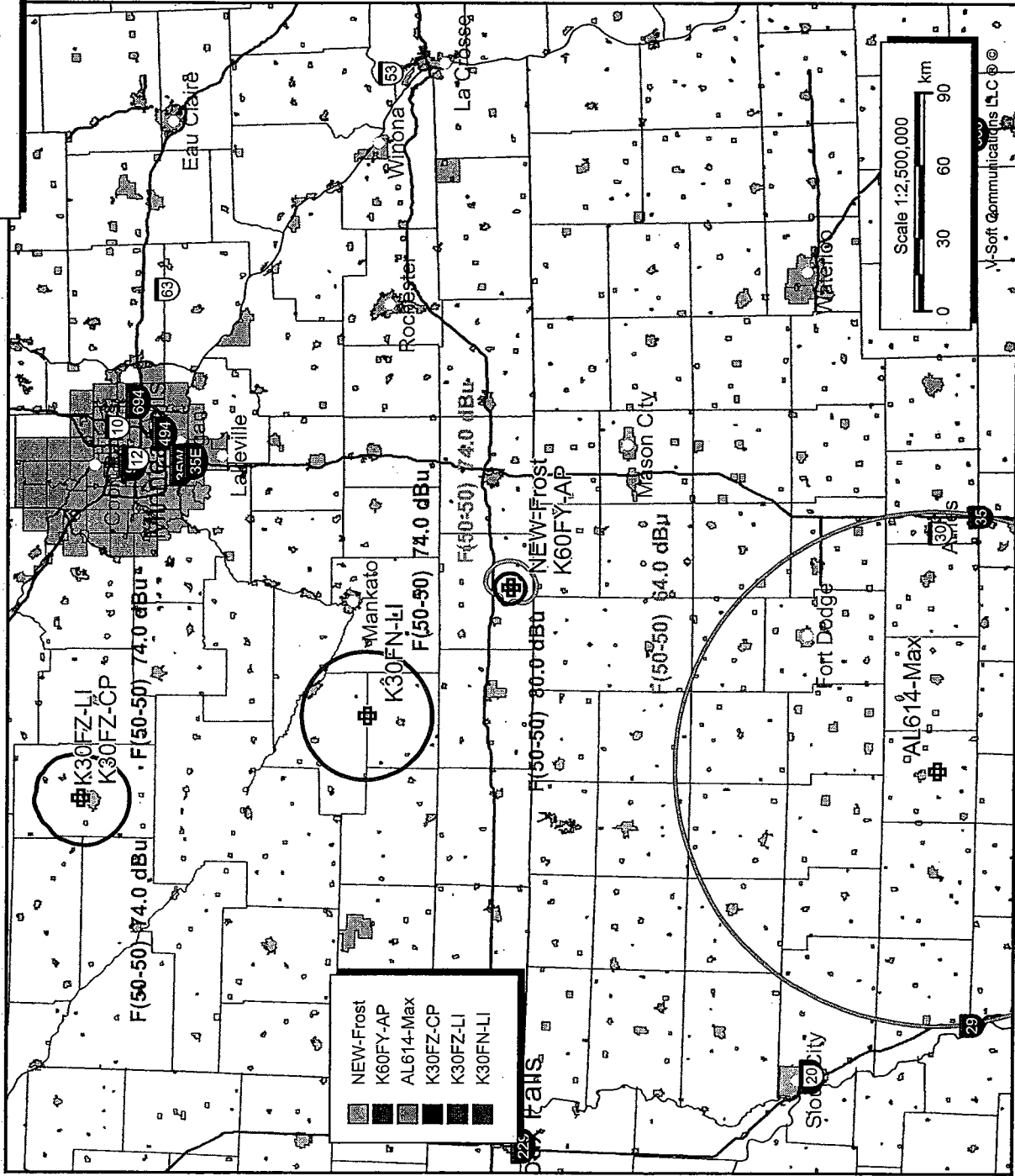


V-Soft Communications

NEW.A
 BNPTTL20000831BSC
 Frost MN
 Latitude: 43-35-09 N
 Longitude: 093-55-46 W
 ERP: 7.00 kW
 Channel: 45+
 Frequency: 659.5 MHz
 AMSL Height: 426.0 m
 Elevation: 343.0 m
 Horiz. Pattern: Directional
 Vert. Pattern: Yes
 Elec Tilt: 0.0
 Prop Model: None

- NEW.A
- K45EH.A
- K45EH.L
- KSTCTV
- K45DF

Exhibit 6.2

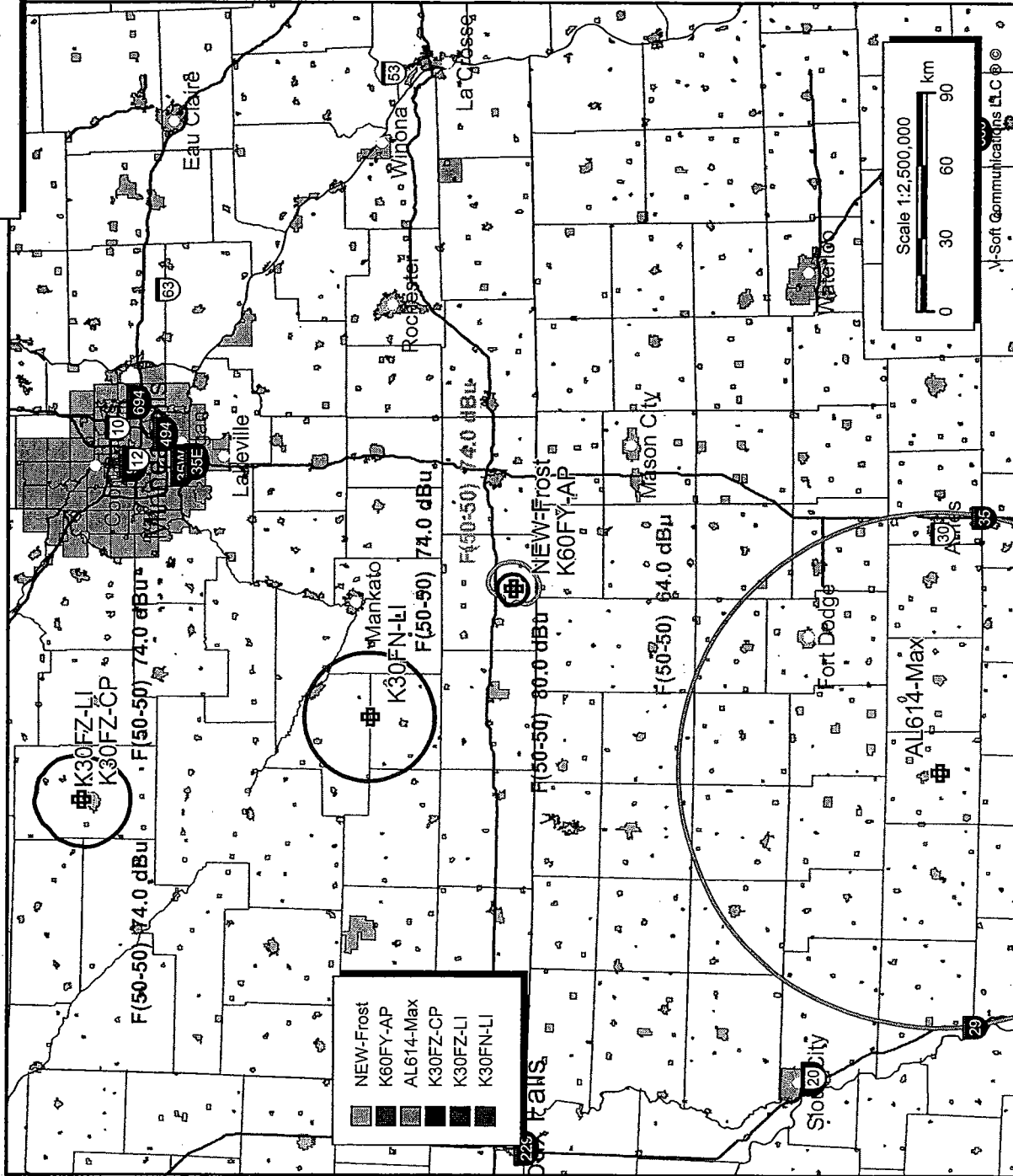


NEW-Frost
 BNPTTL20000831BSC
 Frost MN
 Latitude: 43-35-09 N
 Longitude: 093-55-46 W
 ERP: 7.00 kW
 Channel: 45+
 Frequency: 659.5 MHz
 AMSL Height: 426.0 m
 Elevation: 351.0 m
 Horiz. Pattern: Directional
 Vert. Pattern: Yes
 Elec Tilt: 0.0
 Prop Model: None

K60FY-AP
 BMJPTTL20000821AHC
 Frost MN
 Latitude: 43-35-09 N
 Longitude: 093-55-46 W
 ERP: 1.75 kW
 Channel: 60+
 Frequency: 749.5 MHz
 AMSL Height: 434.0 m
 Elevation: 351.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: Yes
 Elec Tilt: 0.0
 Prop Model: None

Exhibit 6.3

Munn-Reese, Inc.



NEW-Frost
 BNPTTL20000831BSC
 Frost MN
 Latitude: 43-35-09 N
 Longitude: 093-55-46 W
 ERP: 7.00 kW
 Channel: 45+
 Frequency: 659.5 MHz
 AMSL Height: 426.0 m
 Elevation: 351.0 m
 Horiz. Pattern: Directional
 Vert. Pattern: Yes
 Elec Tilt: 0.0
 Prop Model: None

K60FY-AP
 BMJPTTL20000821AHC
 Frost MN
 Latitude: 43-35-09 N
 Longitude: 093-55-46 W
 ERP: 1.75 kW
 Channel: 60+
 Frequency: 749.5 MHz
 AMSL Height: 434.0 m
 Elevation: 351.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: Yes
 Elec Tilt: 0.0
 Prop Model: None

Exhibit 6.4

EXHIBIT 7

COMPLIANCE WITH RADIOFREQUENCY RADIATION GUIDELINES

The proposed antenna will be a Model ALP8L1-HSEC-45 manufactured by Andrew Corporation. The antenna will be mounted with its center of radiation 82 meters above ground, making it 80 meters above an observer on the ground, who is assumed to be 2 meters tall. A maximum effective radiated power of 7.0 kW (7,000 watts) has been requested. The antenna is horizontally polarized.

For NTSC television facilities, Equation 2 of *Supplement A (Edition 97-01) to OET Bulletin No. 65 (Edition 97-01)* can be used to predict the potential exposure to radiofrequency radiation. The equation predicts ground exposure in terms of total power density expressed in units of $\mu\text{W}/\text{cm}^2$. This equation states:

$$S = \frac{33.4(F^2)[0.4ERP_V + ERP_A]}{R^2}$$

where: S = Total Power Density in units of $\mu\text{W}/\text{cm}^2$

F = Relative Field of Pattern

ERP_V = Total Peak Visual Effective Radiated Power in Watts

ERP_A = Total Aural Effective Radiated Power in Watts

R = Distance in Meters

For the region within 315 meters of the base of the supporting structure, the antenna manufacturer's tabulation lists a maximum relative field of 0.268 at a depression angle of 67 degrees. In the case of the present study, a relative field value of 0.30 was used as a "worst case" scenario. The visual ERP was set equal to 7,000 watts with a maximum aural injection of 22 %. A distance of 80 meters was used, which would be the antenna height above a 2 meter tall observer standing at the base of the tower. This is also the shortest possible distance from an observer on the ground to the antenna. Solving the above equation for S yields a total power density of $2.04 \mu\text{W}/\text{cm}^2$.

At Channel 45, the FCC guideline for uncontrolled environments is found by dividing the center frequency of the channel, 659 MHz, by 1500. This gives a maximum allowable exposure of $0.4393 \text{ mW}/\text{cm}^2$, or $439.3 \mu\text{W}/\text{cm}^2$. Thus, the maximum predicted total power density from the proposed LPTV facility is 0.46 % of the limit for uncontrolled environments. At this frequency, the limit for uncontrolled environments is one-fifth of the limit for controlled environments. Therefore, the predicted exposure level is 0.09 % of the limit for controlled environments.

Chapter 47 of the Code of Federal Regulations, §1.1307(b)(3) states: "In general, when the guidelines specified in §1.1310 are exceeded in an accessible area due to the emissions from multiple fixed transmitters, actions necessary to bring the area into compliance are the shared responsibility of all licensees whose transmitters produce, at the area in question, power density levels that exceed 5% of the

power density exposure limit applicable to their particular transmitter or field strength levels that, when squared, exceed 5% of the square of the electric or magnetic field strength limit applicable to their particular transmitter. Owners of transmitter sites are expected to allow applicants and licensees to take reasonable steps to comply with the requirements contained in §1.1307(b) and, where feasible, should encourage co-location of transmitters and common solutions for controlling access to areas where the RF exposure limits contained in §1.1310 might be exceeded.” Because the proposed facility will contribute less than 5.0 % of its applicable limit, it would be categorically exempt from responsibility for bringing the site into compliance with the guidelines—even if the total exposure at the site exceeded the guidelines.

The facility will be properly marked with signs, and entry will be restricted by means of fencing with locked doors and/or gates. Any other means that may be required to protect employees and the general public will be employed. In the event work is required in areas near the antenna where fields could exceed the guidelines, the station will cooperate with other licensees at the site to reduce power or cease operation during the critical period.