Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0029 (February 2007)	FOR FCC USE ONLY
FCC 340		
APPLICATION FOR CONSTRUCTION PERMIT FOR RESERVED CHANNEL NONCOMMERCIAL EDUCATIONAL BROADCAST STATION Read INSTRUCTIONS Before Filling Out Form		FOR COMMISSION USE ONLY FILE NO. BPED - 20070724ABY

Section I - General Information

1.	Legal Name of the Licensee/Permittee MINNESOTA PUBLIC RADIO		
	Mailing Address 480 CEDAR STREET		
	City ST. PAUL	State or Country (if foreign address) MN	Zip Code 55101 -
	Telephone Number (include area code) 6512901259	E-Mail Address (if available) FCCFILING@MPR.ORG	
	FCC Registration Number: 0002642510	Call Sign KBPR	Facility Identifier 42912
2.	Contact Representative (if other than licensee/Permittee) TODD M STANSBURY		Firm or Company Name WILEY REIN LLP
	Telephone Number (include area code) 2027194948		E-Mail Address (if available) TSTANSBURY@WILEYREIN.COM
3.	Is this application being filed in response to a window? If Yes, specify closing date and/or window number:		○ Yes ◉ No

4 **Application Purpose**

○ New station	○ Major Modification of construction permit
○ Major Change in licensed facility	○ Minor Modification of construction permit
◉ Minor Change in licensed facility	○ Major Amendment to pending application
	○ Minor Amendment to pending application
(a) File number of original construction permit:	-
(b) Service Type:	◉ FM ○ TV ○ DTV
(c) Community of License: City: BRAINERD State: MN	
(d) Facility Type	◉ Main ○ Auxiliary
If an amendment, **submit as an Exhibit** a listing by Section and Question Number the portions of the pending application that are being revised.	[Exhibit 1]

NOTE: The failure to include an explanatory providing full particulars in connection with a "No" response may result in dismissal of the application. See Instructions, paragraph L for additional information regarding completion of explanatory exhibits.

SECTION II - Legal and Financial

1.	**Certification.** Applicant certifies that it has answered each question in this application based on	◉ Yes ○ No

	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.	**Eligibility.** Each application must answer "Yes" to one and "No" to two of the three following certifications. An applicant should not submit an explanatory exhibit in connection with these Question 2 "No" responses. The applicant certifies that it is: a. a nonprofit educationl institution; or b. a governmental entity other than a school; or c. a nonprofit educationl organization, other than described in a. or b.	 ○ Yes ◉ No ○ Yes ◉ No ◉ Yes ○ No
3.	For applicants checking "Yes" to question 2(c) and applying for a new noncommercial educationl television station only, the applicant certifies that the applicant's officers, directors and members of its governing board are broadly representative of the educational, cultural, and civic segments of the principal community to be served.	○ Yes ○ No ◉ N/A
4.	a. The applicant certifies that the Commission has previously granted a broadcast application identified here by file number that found this applicant qualified as a noncommercial educational entity with a qualifying educational program, and that the applicant will use the proposed station to advance a program similar to that the Commission has found qualifying in applicant's previous application. b. Applicants who answered "No" to Question 4(a), must include an exhibit that describes the applicant's educational objective and how the proposed station will be used to advance an educational program that will further that objective according to 47 C.F.R. Section 73.503 (for radio applicants) and 47 C.F.R. Section 73.621 (for television applicants).	○ Yes ○ No FCC FileNumber - [Exhibit 2]
5.	The applicant certifies that its governing documents (e.g., articles of incorporation, by-laws, charter, enabling statute, and/or other pertinent organizational document) permit the applicant to advance an educational program and that there is no provision in any of those documents that would restrict the applicant from advancing an educational program or complying with any Commission rule, policy, or provision of the Communications Act of 1934, as amended.	○ Yes ○ No
6.	a. **Parties to the Application.** List separately each party to the application including, as applicable, the applicant, its officers, directors, five percent or greater stockholders, non-insulated partners, members, and all other persons and entities with attributable interests. If another entity hold an attributable interest in the applicant, list separately, as applicable, its officers, directors, five percent or greater stockholders, non-insulated partners, and board members. Create a separate row for each individual or entity. Attach additional pages if necessary. [Enter Parties/Owners Information] b. Applicant certifies that equity and financial interests not set forth above are non-attributable pursuant to 47 C.F.R. Section 73.3555 and that there are no agreements or understandings with any non-party that would give influence over the applicant's programming, personnel, or finances to that non-party.	 ○ Yes ○ No [Exhibit 3]
7.	**Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest pursuant to the notes to 47 C.F.R. Section 73.3555.	☐ N/A [Exhibit 4]
8.	**Character Issues.** Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with: 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.	○ Yes ○ No See Explanation in [Exhibit 5]
9.	**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 any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination. If the answer is "No," attach as an Exhibit a full disclosure concerning the persons and matters involved, including an identification of the the court or administrative body and the proceeding (by dates and file	○ Yes ○ No See Explanation in [Exhibit 6]

	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 the date of filing; and (ii) the disposition of the previously reported matter.	
10.	**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.	○ Yes ○ No See Explanation in [Exhibit 7]
11.	**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.	○ Yes ○ No
12.	**Local Public Notice.** Applicant certifies compliance with the public notice requirements of 47 C.F.R. Section 73.3580.	○ Yes ○ No
13.	**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.	◉ Yes ○ No
14.	**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.	○ Yes ○ No ◉ N/A
QUESTIONS 15, 16 AND 17 APPLY ONLY TO APPLICANTS FOR NEW STATIONS. OTHER APPLICANTS CAN PROCEED TO QUESTION 18.		
15.	**Financial.** The applicant certifies that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without revenue. If "No" to 15., answer question 16. and 17.	○ Yes ○ No See Explanation in [Exhibit 8]
16.	Is this application contingent upon receipt of a grant from the National Telecommunications and Information Administration?	○ Yes ○ No
17.	Is this application contingent upon receipt of a grant from a charitable organization, the approval of the budget of a school or university, or an appropriation from a state, county, municipality or other political subdivision?	○ Yes ○ No
NOTE: If Yes to 16. **or** 17., the application cannot be granted unconditionally until all of the necessary funds are committed or appropriated. In the case of grants from the National Telecommunications and Information Administration, no further action on the applicant's part is required. If the applicant relies on funds from a source specified in Question 17., **the applicant must advise the Commission when the funds are committed or appropriated.** This should be accomplished by letter amendment to the application. Applicants should take note that the Commission's construction period is not considered "tolled" by funding difficulties and that any permit granted conditionally on funding will expire if the station is not constructed for any reason, including lack of funding.		
QUESTIONS 18 AND 19 DO NOT APPLY TO APPLICATIONS FOR NEW STATIONS. APPLICANTS FOR NEW FM STATIONS CAN PROCEED TO SECTION III. APPLICANTS FOR NEW TV STATIONS CAN PROCEED TO SECTION IV.		
Holding Period.		
18.	Applicant certifies that this application does not propose a modification to an authorization that was awarded on the basis of a preference for fair distribution of service pursuant to 47 U.S.C. Section 307(b). If "No," answer a. and b. below. If applicant answers "No" to 18. above and cannot answer "Yes" to either a. or b. below, the application is unacceptable.	◉ Yes ○ No
	a. Applicant certifies that the proposed modification will not downgrade service to the area on which the Section 307(b) preference was based.	○ Yes ○ No
	b. Applicant certifies that although it proposes to downgrade service to the area on which the Section 307(b) preference was based, applicant has provided full service to that area for a period of four years of on-air operations.	○ Yes ○ No
19.	Applicant certifies that this application does not propose a modification to an authorized station that received a credit for superior technical parameters under the point system selection method in 47 C.F.R. Section 73.7003. If "No," applicant must be able to answer "Yes" to a. below or provide an exhibit that makes a	◉ Yes ○ No

	compelling showing that the downgrade would be in the public interest. a. Applicant certifies that the population and area within the proposed service contour (60 dBu (FM) or grade B (TV)) are greater than or equivalent to those authorized.	○ Yes ○ No [Exhibit 9]

Section III

Fair Distribution of Service Pursuant to 47 U.S.C. Section 307(b) (New and Major Changes to FM Radio Only) (Other applicants can proceed to Section IV).

1.	Applicant certifies that the proposed station will provide a first noncommercial educational aural service to (a) at least 10 percent of the people residing within the station's 60 dBu (1mV/m) service contour **and** (b) to a minimum of 2,000 people. Applicants answering "Yes" must provide an Exhibit.	○ Yes ○ No [Exhibit 10]
2.	Applicant certifies that the proposed station will provide a second noncommercial educational aural service to (a) at least 10 percent of the people residing within the station's 60 dBu (1mV/m) service contour **and** (b) to a minimum of 2,000 people. Applicants answering "Yes" must provide an Exhibit.	○ Yes ○ No [Exhibit 11]

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

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.	○ Yes ○ No
2.	**Diversity of Ownership:** (a) Applicant certifies that the principal community (city grade) contour of the proposed station does not overlap the principal community contour of any other authorized station (comparing radio and television to television, including non-fill-in translator stations other than those identified in 2(b) below) 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 be maintained, and that it has placed documentation of its diversity qualification in a local public inspection file and has submitted to the Commission copies of the documentation.	○ Yes ○ No
	(b) Is the application's certification to 2(a) based on its exclusion of translator station(s) that will be replaced with a full service station pursuant to the authorization requested here? If Yes, applicant must include an exhibit identifying the translator station authorization for which it will request cancellation upon commencement of operation of the proposed full service station (i.e., upon its filing of a license application and receipt of program test authority).	○ Yes ○ No [Exhibit 12]
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.	○ Yes ○ No
4.	**Technical Parameters:** Applicant certifies that the numbers in the boxes below accurately reflect the new area and population that its proposal would serve with a 60 dBu (FM) or Grade B (TV) signal measured in accordance with the standard predicted contours in 47 C.F.R. Section 73.713(c) (FM) and 73.683(TV) 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 any area already within the station's existing service area). (Points, if any, will be determined by FCC)	○ Yes ○ No
	New 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:	

SECTION V - Tie Breakers - New and Major Change Applications Only (used to choose among competing radio and television applications receiving the same number of points in Section IV)

1.	**Existing Authorizations.** By placing a number in the box, the applicant certifies that it and other parties to the application have, as of the date of filing and pursuant to 47 C.F.R. Section 73.3555, attributable interests in the stated number of relevant broadcast station authorizations. Radio applicants should count all attributable full service radio stations, AM and FM, commercial and noncommercial, and FM translator stations other than fill-in stations or those identified in IV (2)(b) above. TV applicants should count all attributable full service TV stations, commercial and noncommercial and TV translator stations other than fill-in stations or those identified in IV(2)(b) above. (number of commercial and non-commercial licenses and construction permits)
2.	**Pending Applications.** By placing a number in the box, the applicant certifies that it and other parties to the application have, as of the date of filing and pursuant to 47 C.F.R. Section 73.3555, attributable interests in the stated number of pending applications for new or major changes to relevant broadcast stations. Radio applicants should count all attributable full service radio stations, AM and FM, commercial and noncommercial, and FM translator stations other than fill-in stations or those identified in IV(2)(b) above. TV applicants should count all attributable full service TV stations, commercial and noncommercial, and TV translator stations other than fill-in stations or those identified in IV(2)(b) above. (number of pending commercial and non-commercial applications)

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 7/24/2007

Section VII Preparer's Certification

I certify that I have prepared Section VII (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 7/17/2007	
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 VII - FM 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 Number: 214
2.	Class (select one): ○ D ○ A ○ B1 ○ B ○ C3 ○ C2 ◉ C1 ○ C0 ○ C

3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 46 Minutes 25 Seconds 21 ◉ North ○ South Longitude: Degrees 94 Minutes 27 Seconds 41 ◉ West ○ East	
4.	Proposed Assignment Coordinates: (NAD 27) - RESERVED CHANNELS ABOVE 220 ONLY ☑ Not Applicable Latitude: Degrees Minutes Seconds ○ North ○ South Longitude: Degrees Minutes Seconds ○ West ○ East	
5.	Antenna Structure Registration Number: 1024193 ☐ Not Applicable ☐ Notification filed with FAA	
6.	Overall Tower Height Above Ground Level:	206 meters
7.	Height of Radiation Center Above Mean Sea Level:	597 meters(H) 597 meters(V)
8.	Height of Radiation Center Above Ground Level:	179 meters(H) 179 meters(V)
9.	Height of Radiation Center Above Average Terrain:	207 meters(H) 207 meters(V)
10.	Effective Radiated Power:	100 kW(H) 100 kW(V)
11.	Maximum Effective Radiated Power: (Beam-Tilt Antenna ONLY) ☑ Not Applicable	kW(H) kW(V)

12. Directional Antenna Relative Field Values: ☑ Not applicable (Nondirectional)
Rotation (Degrees): ☐ 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

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

AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 12-15.

13.	**Main Studio Location.** The proposed main studio location complies with 47 C.F.R. Section 73.1125.	○ Yes ◉ No See Explanation in [Exhibit 13]
14.	**Community Coverage.** The proposed facility complies with 47 C.F.R. Section 73.315. (Channels 221 and above) or 47 C.F.R. Section 73.515 (Channels 220 and below).	◉ Yes ○ No See Explanation in [Exhibit 14]
15.	**Interference.** The proposed facility complies with all of the following applicable rule sections. Check all that apply:	◉ Yes ○ No See Explanation in [Exhibit 15]
	Contour Overlap Requirements. a. ☑ 47 C.F.R. Section 73.509 **Exhibit Required.**	[Exhibit 16]

	Spacing Requirements. b. ☐ 47 C.F.R. Section 73.207 with respect to station(s)	
	Grandfathered Short-Spaced. c. ☐ 47 C.F.R. Section 73.213(a) with respect to station(s) **Exhibit Required.**	[Exhibit 17]
	Contour Protection. d. ☐ 47 C.F.R. Section 73.215(a) with respect to station(s) **Exhibit Required.**	[Exhibit 18]
	Television Channel 6 Protection. e. ☑ 47 C.F.R. Section 73.525 with respect to station(s) **Exhibit Required.**	[Exhibit 19]
16.	**Reserved Channels Above 220.** a. **Availability of Channels.** The proposed facility complies with the assignment requirements of 47 C.F.R. Section 73.203.	○ Yes ○ No See Explanation in [Exhibit 20]
17.	**International Borders.** The proposed antenna location is not within 320 kilometers of the common border between the United States and Canada or Mexico. If "No," specify the country and provide an exhibit of compliance with all provisions of the relevant International Agreement.	○ Yes ○ No ◉ Canada ○ Mexico [Exhibit 21]
18.	**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 compliance through the use of the RF worksheets in Worksheet #7, 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.	◉ Yes ○ No See Explanation in [Exhibit 22]
19.	**Community of License Change - Section 307(b).** If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change comports with the fair distribution of service policies underlying Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)). **An exhibit is required** unless this question is not applicable.	○ Yes ○ No ◉ N/A [Exhibit 23]
PREPARER'S CERTIFICATION ON PAGE 8 MUST BE COMPLETED AND SIGNED.		

Exhibits

Exhibit 1
Description: ENGINEERING STATEMENT

Attachment 1

Description
Exhibit #1, Engineering Statement

Exhibit 13
Description: MAIN STUDIO LOCATION

Attachment 13

Description

Exhibit #13, Main Studio Location

Exhibit 14
Description: COMMUNITY COVERAGE

Attachment 14

Description
Exhibit #14, Community Coverage

Exhibit 16
Description: CONTOUR OVERLAP REQUIREMENTS

Attachment 16

Description
Exhibit #16, Contour Overlap Requirements

Exhibit 19
Description: TELEVISION CHANNEL 6 PROTECTION

Attachment 19

Description
Exhibit #19, Television Channel 6 Protection

Exhibit 22
Description: RF EMISSIONS COMPLIANCE STATEMENT

Attachment 22

Description
Exhibit #22, RF Emissions Compliance Statement

Doug Vernier
721 West 1st Street, Suite A
Cedar Falls, Iowa 50613
(319) 266-8402
Telecommunications Consultants

EXHIBIT #1
ENGINEERING STATEMENT

Minnesota Public Radio
Minor Change to Licensed Station
KBPR
BLED-19880222KG
Brainerd, MN

July 2007

CH 214C1 100 kW H & V

This engineering statement supports application filed by Minnesota Public Radio to make a minor change to licensed NCE FM station KBPR, Brainerd, Minnesota.

The applicant proposes to increase effective radiated power. No other changes are being proposed at this time.

Exhibit #13 consists of a request to continue the main studio location waiver previously granted to KBPR under license BLED-19880222KG.

Exhibit #14 shows that the proposed facility meets the community coverage requirements of Section 73.515.

A total of 8 evenly spaced radials were used to determine the antenna height above average terrain. The N.G.D.C. 30 arc second database was employed to determine the elevations along the radials that were averaged using the required four-point interpolation method. The resulting averaged radial antenna heights were employed using the Commission's own TVFMINT algorithm to project the distances to signal contours. A map of the proposed 60 dBu contour, with cardinal radials is included on page #2. A tabular listing of the distance to the 60 dBu contour can be found on page #3 of this exhibit.

Exhibit #16 is an Allocation Report showing that there is no prohibited contour overlap with any existing license, construction permit or application.

Exhibit #19 defines the protection afforded under Section 73.525 to the only Television Channel 6 station within the 187 kilometer cutoff distance for NCE FM stations on Channel 214. KBJR-TV operates with 100 kW ERP from a site 76 kilometers distant from KBPR. Assuming a study ERP of 102.5 kW, the FM 71.8 dBu interference contour does not overlap the protected 47 dBu of KBJR-TV. Although the 6 dB receiver directivity

credit is valid in this case, it was not applied.

The applicant proposes the continued use of registered tower ASR #1024193, constructed in1985. Since this tower was built before March, 2001 and since no changes are being proposed to the tower structure itself, this application is excluded from environmental processing under 47. C.F.R. Section 1.1306.

Exhibit #22 is an R.F. emissions compliance statement, showing that workers and the general public are protected from excess radio frequency emissions.

The proposed station is within 320 kilometers of the US border with Canada, however there are no pertinent relationships with Canadian stations, applications or allotments. The proposed station is not within the specific critical distances to AM broadcast towers, FCC monitoring stations, Table Mountain and the West Virginia Quiet Zone. The applicant is aware of its responsibility under the rules to correct any blanketing interference it may cause within the period of one year from commencement of transmissions of newly authorized facilities.

Page #3 of Exhibit #1 is a statement of the qualifications of the preparer.

Kate Michler

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 been a member of the firm for over nine years, and;

That, my 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, and;

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

Executed on July 9, 2007

EXHIBIT #13
MAIN STUDIO LOCATION

Minnesota Public Radio
Minor Change to Licensed Station
KBPR
BLED-19880222KG
Brainerd, MN

July 2007

CH 214C1 100 kW H & V

KBPR has been granted a waiver of Section 73.1125 in order to operate the station as a satellite of its commonly owned NCE station KSJN(FM), Minneapolis, Minnesota. Please see the letter from FCC staff granting the waiver, attached as pages 2-3.

Minnesota Public Radio respectfully requests a continuation of that waiver.

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D. C. 20554

May 5, 2000

IN REPLY REFER TO:
1800B3-ALM

Todd M. Stansbury, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D. C. 20006

In Re: KBPR(FM), Brainerd, Minnesota
Minnesota Public Radio
Facility ID No. 42912
Request for Waiver of 47 C.F.R.
§ 73.1125 (Main Studio Rule)

Dear Mr. Stansbury:

The staff has under consideration the request of Minnesota Public Radio ("MPR") for a waiver of the Commission's main studio requirement, *see* 47 C.F.R. § 73.1125, in order to operate the KBPR(FM) as a satellite of its commonly owned NCE station KSJN(FM), Minneapolis, Minnesota.[1] For the reasons set forth below, we shall grant MPR's request for waiver.

Section 73.1125(a) requires each broadcast station to maintain a main studio within the station's principal community contour to ensure that the station will serve the needs and interests of the residents of its community of license. *Amendment of Sections 73.1125 and 73.1130*, 3 FCC Rcd 5024, 5027 (1988). However, under Section 73.1125(a)(4), the Commission will waive this requirement where "good cause" exists to do so and where the proposed studio location "would be consistent with the operation of the station in the public interest." Each waiver request by an NCE station seeking to operate as the satellite of another NCE station is considered on a case-by-case basis. The Commission has recognized the benefits of centralized operations for NCE stations, given their limited funding, and thus found "good cause" exists to waive the main studio location requirement where satellite operations are proposed. *Id.* A satellite station must, however, demonstrate that it will meet its local service obligation to satisfy the Section 73.1125 "public interest" standard. *Id.*

[1] A "satellite" station meets all of the Commission's technical rules, however, it originates no programming and instead rebroadcasts the parent station's programming. *See* Amendment of Multiple Ownership Rules, *Memorandum Opinion and Order*, 3 RR2d 1554, 1562 (1964).

MPR's request is based on the economies of scale that would be realized by grant of its waiver. We agree and conclude that there is "good cause" to waive 47 C.F.R. § 73.1125(a)(4) in these circumstances.

MPR proposes to operate KBBR(FM), Brainerd, Minnesota, as a satellite of KSJN(FM), Minneapolis, Minnesota, approximately 100 miles from Brainerd. Where there is a great distance between parent and satellite stations, as here, we are particularly concerned that the licensee take adequate measures to maintain its awareness of the satellite community's needs and interests. To that end, MPR has pledged to: (1) continue its policy that residents of each service area participate on a regional advisory council which provides input to management on programming issues of interest to the residents throughout MPR's service area, including Brainerd; (2) continue its existing relationship with the community of Brainerd which has been established by means of membership in MPR; (3) solicit comments from MPR members in Brainerd concerning programming and station operation; (4) employ a Brainerd-based news reporter who will produce and broadcast local inserts of interest to Brainerd and who will subscribe to local and area publications and maintain ongoing relationships with community residents and leaders, who will periodically contact and update the reporter concerning matters of local interest; (5) maintain a toll-free telephone number for residents of Brainerd to contact MPR management in accordance with 47 C.F.R. § 73.1125(c); and (6) operate a site on the World Wide Web, which enables local residents to receive extensive information and comment on MPR's programming.

In these circumstances, we are persuaded that MPR will meet its local service obligations and thus, that grant of the requested waiver is consistent with the public interest. We remind MPR, however, of the requirement that it maintain a public file for the Brainerd station at the main studio of the "parent" station, KSJN(FM). It must also make reasonable accommodation for listeners wishing to examine the file's contents. *See Review of the Commission's Rules Regarding the Main Studio and Local Public Inspection Files of Broadcast Television and Radio Stations*, 64 Fed. Reg. 35941 (July 2, 1999). We further remind MPR that, notwithstanding the grant of the waiver requested here, the public file for KBPR(FM) station must contain the quarterly issues and programs list for Brainerd, Minnesota required by 47 C.F.R. § 73.3527(e)(8).

Accordingly, the request of Minnesota Public for waiver of 47 C.F.R. § 73.1125 IS HEREBY GRANTED.

Sincerely,

By: Linda Blair, Chief
Audio Services Division
Mass Media Bureau

EXHIBIT #14
COMMUNITY COVERAGE

Minnesota Public Radio
Minor Change to Licensed Station
KBPR
BLED-19880222KG
Brainerd, MN

July 2007

CH 214C1 100 kW H & V

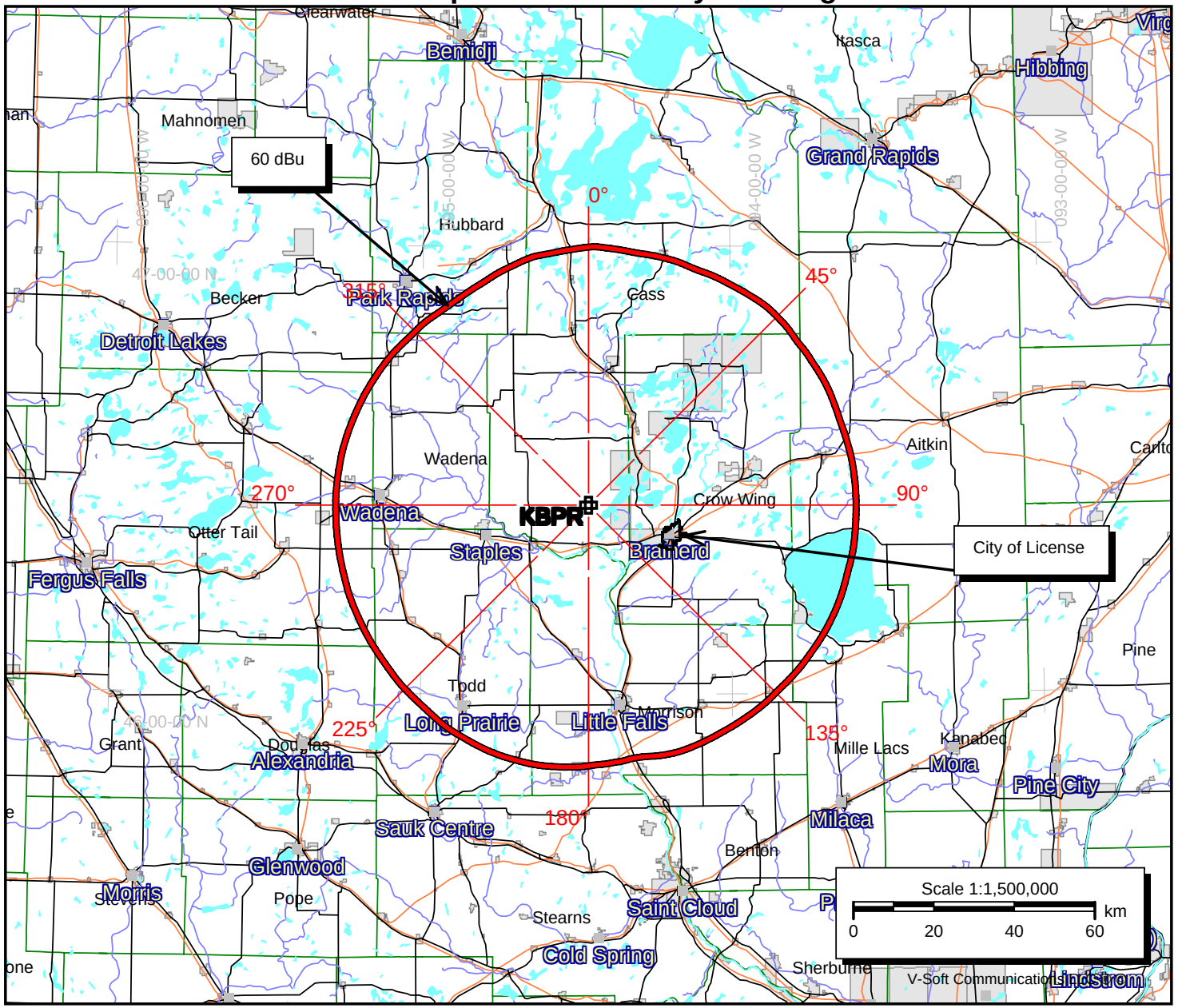
The map on Page #2 of this exhibit depicts the 60 dBu, F(50-50) principal community coverage contour for the proposed facility. It is apparent from this map that the city of license, Brainerd, is encompassed by that contour, as required by Section 73.515 of the Commission's rules. A table of the distance to 60 dBu contour can be found on Page #3.

Proposed Community Coverage - Brainerd Class C1

KBPR
Brainerd, MN C1
Latitude: 46-25-21 N
Longitude: 094-27-41 W
ERP: 100.00 kW
Channel: 214
Frequency: 90.7 MHz
AMSL Height: 597.0 m
HAAT: 207.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

7/17/2007

Doug Vernier
721 West 1st Street, Suite A
Cedar Falls, Iowa 50613
Telecommunications Consultants



N. Lat. = 462521.0 W. Lng. = 942741.0
HAAT and Distance to Contour - FCC Method - NGDC 30 SEC
KBPR - Minor Change Application - Power Increase

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5
000	394.3	202.7	100.0000	20.00	1.000	64.05
045	370.8	226.2	100.0000	20.00	1.000	66.22
090	368.0	229.0	100.0000	20.00	1.000	66.48
135	375.4	221.6	100.0000	20.00	1.000	65.81
180	387.2	209.8	100.0000	20.00	1.000	64.73
225	389.6	207.4	100.0000	20.00	1.000	64.50
270	407.9	189.1	100.0000	20.00	1.000	62.76
315	426.7	170.3	100.0000	20.00	1.000	60.91

Ave El= 389.99 M HAAT= 207.01 M AMSL= 597 M

Exhibit #16

Minnesota Public Radio
Upgrade Study for KBPR

REFERENCE CH# 214C1 - 90.7 MHz, Pwr= 100 kW, HAAT= 207.0 M, COR= 597 M DISPLAY DATES
46 25 21.0 N. Average Protected F(50-50)= 64.46 km DATA 07-14-07
94 27 41.0 W. SEARCH 07-16-07

CH CALL / CITY	TYPE ANT / STATE	AZI <--	DIST / FILE #	LAT / LNG	PWR(kW) / HAAT(M)	INT(km) / COR(M)	PRO(km) / LICENSEE	*IN* (Overlap in km)	*OUT*
214C1 KBPR	LIC _CN	0.0	0.00	46 25 21.0	34.000	135.8	54.1	-199.85*	-216.23*
Brainerd	MN	0.0	BLED19880222KG	94 27 41.0	207	597	Minnesota Public Radio		
06+2C KBJRTV	LI _HY	76.3	184.40	46 47 21.0	100.000		95.0	186.5R	-2.1M
Superior	WI	258.0	BLCT20000517AEX	92 06 51.0	302	604	Kbjr License, Inc.		
213A AP3032	APP _CX	348.6	128.62	47 33 21.0	6.000	42.9	27.8	22.51	7.07
Bemidji	MN	168.3	BNPED20000204AAO	94 48 04.0	100	520	Community Religious Broadc		
268C3 KFGI	LIC _C_	67.8	42.25	46 33 52.0	25.000	2.0	12.5	30.5R	11.8M
Crosby	MN	248.2	BLH19990506KC	93 57 03.0	100	473	Red Rock Radio Corp.		
211C1 KSJR-FM	LIC _CN	183.3	102.95	45 29 52.0	100.000	9.4	69.2	28.38	25.24
Collegeville	MN	3.2	BMLED19880616KA	94 32 14.0	258	617	Minnesota Public Radio		
215A KKLW	LIC _CX	195.7	141.31	45 11 52.0	0.400	24.3	16.2	51.23	27.96
Willmar	MN	15.3	BLED20040204ABY	94 56 58.0	129	491	Educational Media Foundati		
215C2 WIRR	LIC _CN	46.2	174.74	47 29 46.0	21.000	69.9	47.4	38.61	29.77
Virginia-hibbing	MN	227.4	BLED19850827KC	92 47 05.0	168	615	Minnesota Public Radio		
213C3 KDNI	LIC _C_	76.3	184.40	46 47 21.0	2.000	37.4	24.8	80.86	62.07
Duluth	MN	258.0	BLED20010305AAE	92 06 51.0	222	524	Northwestern College		
217C1 KNBJ	LIC _CN	359.3	142.68	47 42 21.0	65.000	9.0	68.1	69.68	66.31
Bemidji	MN	179.2	BLED20030429AAP	94 29 09.0	301	720	Minnesota Public Radio		
213B CBQTFM«	OPE _CN	12.4	252.66	48 38 22.0	50.000	78.1	65.1	106.22	68.85
Fort Frances	ON	193.0		93 43 14.0	142	493			
06Z2C WDAYTV	LI _HN	288.4	219.36	47 00 43.0	100.000		108.4	150.3R	69.0M
Fargo	ND	106.4	BMLCT624	97 11 58.0	351	643	Forum Communications Compa		
214A WVSS	LIC DCX	131.3	250.20	44 54 56.0	0.590	52.5	15.4	131.71	70.38
Menomonie	WI	313.0	BLED20020903AFN	92 04 34.0	130	449	Board Of Regents, Universi		

Terrain database is NGDC 30 SEC
ERP and HAAT are on direct line to and from reference station.
Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
"*"affixed to 'IN' or 'OUT' values = site inside protected contour.
"«" = Station meets FCC minimum distance spacing for its class.
Reference station has protected zone issue: Canada

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".

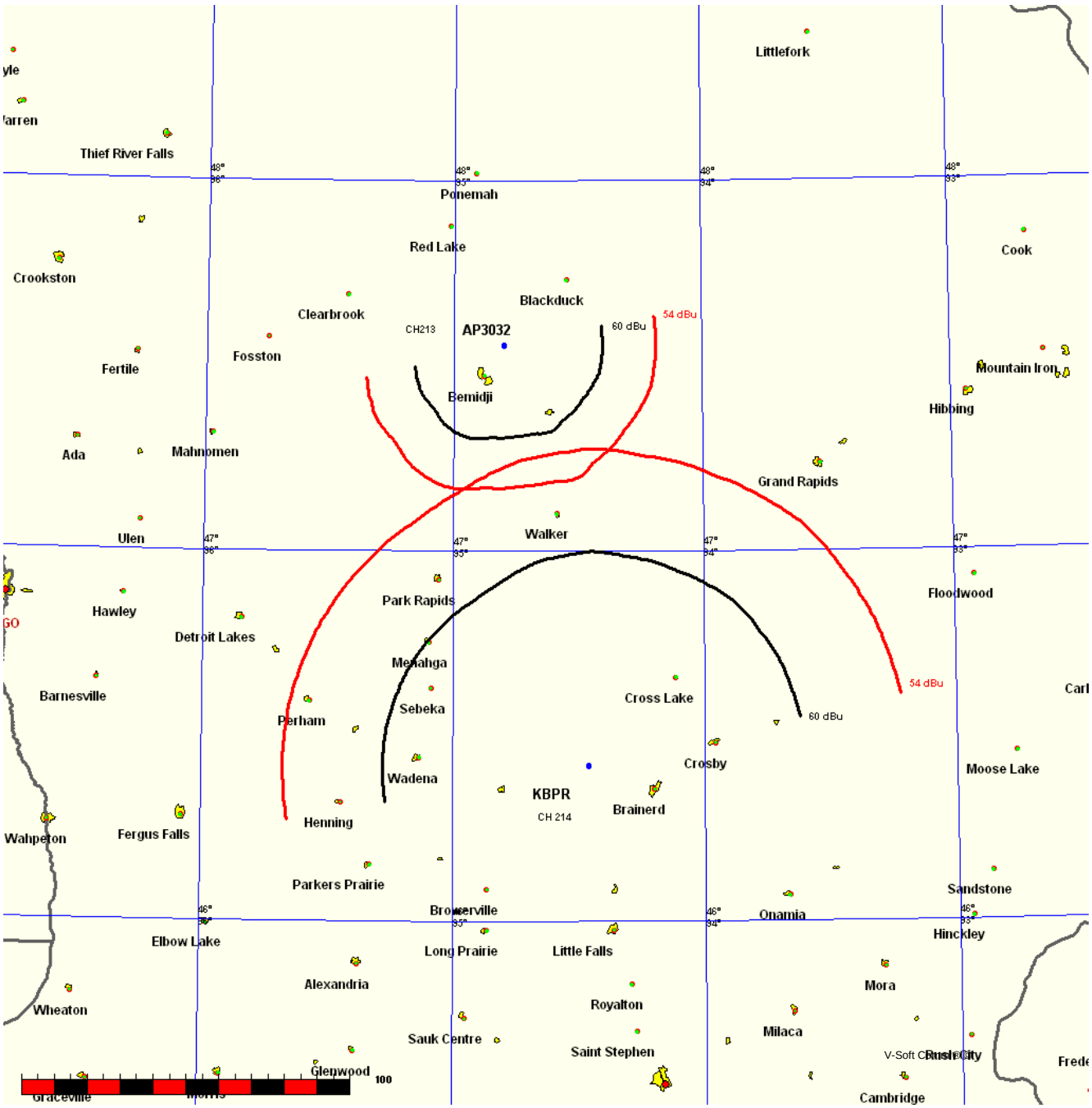
The first three letters of the "TYPE" column identify the current FCC status of the stations. The fourth letter will be a "D" if the facility is directional. “Z” indicates a 73.215 directional. An “N” indicates it is a 73.215 station that operates omni. The fifth letter will be an E, H or V depending 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”.

FMCommander Single Allocation Study
07-16-2007

KBPR CH 214 C1
100.0 kW 597 M COR
Prot. = 60 dBu
Intef. = 54 dBu

AP3032 CH 213 A BNPED20000204AAO
6.0 kW, 519.7 M COR
Prot. = 60 dBu
Intef. = 54 dBu

Scale = 1:3,000,000



KBPR
Channel = 214C1
Max ERP = 100 kW
RCAMSL = 597 M
N. Lat. 46 25 21.0
W. Lng. 94 27 41.0
Protected
60 dBu

AP3032 BNPED20000204AAO
Channel = 213A
Max ERP = 6 kW
RCAMSL = 519.7 M
N. Lat. 47 33 21.0
W. Lng. 94 48 04.0
Interfering
54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
289.0	100.0000	0183.9	062.3	197.4	006.0000	0107.8	110.7	34.59
290.0	100.0000	0183.4	062.2	197.4	006.0000	0107.8	109.7	34.80
291.0	100.0000	0183.0	062.2	197.4	006.0000	0107.8	108.6	35.01
292.0	100.0000	0182.5	062.1	197.3	006.0000	0107.7	107.5	35.22
293.0	100.0000	0182.0	062.1	197.2	006.0000	0107.6	106.5	35.44
294.0	100.0000	0181.7	062.1	197.2	006.0000	0107.5	105.4	35.66
295.0	100.0000	0181.4	062.0	197.1	006.0000	0107.3	104.3	35.89
296.0	100.0000	0181.0	062.0	197.0	006.0000	0107.2	103.3	36.12
297.0	100.0000	0180.6	062.0	196.8	006.0000	0107.0	102.2	36.35
298.0	100.0000	0180.1	061.9	196.7	006.0000	0106.8	101.1	36.58
299.0	100.0000	0179.5	061.9	196.5	006.0000	0106.5	100.1	36.81
300.0	100.0000	0179.0	061.8	196.4	006.0000	0106.3	099.1	37.04
301.0	100.0000	0178.5	061.8	196.2	006.0000	0106.0	098.0	37.28
302.0	100.0000	0178.2	061.7	196.0	006.0000	0105.7	097.0	37.52
303.0	100.0000	0177.8	061.7	195.8	006.0000	0105.3	096.0	37.76
304.0	100.0000	0177.4	061.7	195.6	006.0000	0105.0	095.0	38.00
305.0	100.0000	0176.9	061.6	195.3	006.0000	0104.6	094.0	38.25
306.0	100.0000	0176.4	061.5	195.0	006.0000	0104.3	093.0	38.49
307.0	100.0000	0175.8	061.5	194.8	006.0000	0103.9	092.0	38.73
308.0	100.0000	0175.1	061.4	194.5	006.0000	0103.5	091.0	38.97
309.0	100.0000	0174.3	061.3	194.1	006.0000	0103.1	090.1	39.20
310.0	100.0000	0173.4	061.2	193.8	006.0000	0102.7	089.2	39.44
311.0	100.0000	0172.5	061.2	193.4	006.0000	0102.3	088.3	39.67
312.0	100.0000	0171.6	061.1	193.0	006.0000	0101.8	087.4	39.89
313.0	100.0000	0170.8	061.0	192.6	006.0000	0101.4	086.5	40.11
314.0	100.0000	0170.4	060.9	192.2	006.0000	0101.0	085.6	40.34
315.0	100.0000	0170.3	060.9	191.8	006.0000	0100.6	084.7	40.57
316.0	100.0000	0170.4	060.9	191.4	006.0000	0100.3	083.8	40.80
317.0	100.0000	0170.4	060.9	191.0	006.0000	0100.0	083.0	41.03
318.0	100.0000	0170.2	060.9	190.6	006.0000	0099.7	082.1	41.25
319.0	100.0000	0169.6	060.8	190.1	006.0000	0099.2	081.3	41.45
320.0	100.0000	0168.8	060.7	189.5	006.0000	0098.7	080.6	41.63
321.0	100.0000	0167.9	060.6	189.0	006.0000	0098.1	079.8	41.81
322.0	100.0000	0167.3	060.6	188.4	006.0000	0097.5	079.1	41.98
323.0	100.0000	0166.8	060.5	187.9	006.0000	0097.0	078.4	42.16
324.0	100.0000	0166.6	060.5	187.3	006.0000	0096.8	077.7	42.35
325.0	100.0000	0166.5	060.5	186.7	006.0000	0096.7	077.0	42.54

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
326.0	100.0000	0166.7	060.5	186.1	006.0000	0096.7	076.3	42.73
327.0	100.0000	0167.0	060.5	185.5	006.0000	0096.6	075.6	42.93
328.0	100.0000	0167.4	060.6	184.9	006.0000	0096.6	074.9	43.12
329.0	100.0000	0167.9	060.7	184.3	006.0000	0096.6	074.2	43.31
330.0	100.0000	0168.5	060.7	183.6	006.0000	0096.5	073.6	43.50
331.0	100.0000	0169.3	060.8	183.0	006.0000	0096.5	072.9	43.68
332.0	100.0000	0170.1	060.9	182.3	006.0000	0096.4	072.3	43.85
333.0	100.0000	0170.8	061.0	181.6	006.0000	0096.3	071.7	44.02
334.0	100.0000	0171.8	061.1	180.8	006.0000	0096.2	071.1	44.18
335.0	100.0000	0172.9	061.2	180.1	006.0000	0096.1	070.5	44.34
336.0	100.0000	0174.4	061.3	179.4	006.0000	0095.9	070.0	44.50
337.0	100.0000	0176.1	061.5	178.6	006.0000	0095.6	069.4	44.65
338.0	100.0000	0178.0	061.7	177.8	006.0000	0095.3	068.8	44.80
339.0	100.0000	0179.7	061.9	177.0	006.0000	0095.1	068.3	44.93
340.0	100.0000	0181.1	062.0	176.2	006.0000	0094.9	067.9	45.05
341.0	100.0000	0182.4	062.1	175.3	006.0000	0094.8	067.5	45.17
342.0	100.0000	0183.9	062.3	174.5	006.0000	0094.7	067.1	45.28
343.0	100.0000	0185.6	062.4	173.6	006.0000	0094.8	066.7	45.39
344.0	100.0000	0187.4	062.6	172.7	006.0000	0095.0	066.4	45.51
345.0	100.0000	0189.3	062.8	171.7	006.0000	0095.0	066.0	45.61
346.0	100.0000	0191.1	063.0	170.8	006.0000	0095.1	065.8	45.70
347.0	100.0000	0192.5	063.1	169.9	006.0000	0095.4	065.6	45.78
348.0	100.0000	0193.3	063.2	168.9	006.0000	0095.8	065.4	45.84
349.0	100.0000	0193.5	063.2	167.9	006.0000	0096.2	065.4	45.86
350.0	100.0000	0193.3	063.2	167.0	006.0000	0096.2	065.5	45.85
351.0	100.0000	0193.4	063.2	166.0	006.0000	0096.5	065.5	45.84
352.0	100.0000	0194.0	063.2	165.0	006.0000	0097.0	065.6	45.86
353.0	100.0000	0195.0	063.3	164.1	006.0000	0097.4	065.7	45.87
354.0	100.0000	0196.0	063.4	163.1	006.0000	0097.8	065.8	45.86
355.0	100.0000	0196.8	063.5	162.1	006.0000	0098.0	065.9	45.83
356.0	100.0000	0197.8	063.6	161.2	006.0000	0098.4	066.1	45.80
357.0	100.0000	0198.8	063.7	160.2	006.0000	0099.0	066.3	45.77
358.0	100.0000	0200.1	063.8	159.3	006.0000	0099.9	066.5	45.76
359.0	100.0000	0201.4	063.9	158.3	006.0000	0101.3	066.8	45.76
000.0	100.0000	0202.7	064.1	157.4	006.0000	0102.8	067.1	45.76
001.0	100.0000	0203.9	064.2	156.5	006.0000	0104.1	067.4	45.74
002.0	100.0000	0203.7	064.1	155.6	006.0000	0105.2	067.9	45.64
003.0	100.0000	0202.8	064.1	154.8	006.0000	0106.1	068.5	45.52
004.0	100.0000	0202.2	064.0	154.0	006.0000	0107.0	069.1	45.39
005.0	100.0000	0201.5	063.9	153.3	006.0000	0107.7	069.7	45.24
006.0	100.0000	0201.1	063.9	152.5	006.0000	0108.5	070.3	45.09
007.0	100.0000	0200.6	063.9	151.8	006.0000	0109.2	071.0	44.93
008.0	100.0000	0200.2	063.8	151.1	006.0000	0109.7	071.7	44.75
009.0	100.0000	0199.6	063.8	150.4	006.0000	0110.2	072.4	44.56
010.0	100.0000	0199.2	063.7	149.7	006.0000	0110.5	073.2	44.36
011.0	100.0000	0199.4	063.7	149.1	006.0000	0110.6	073.9	44.16
012.0	100.0000	0200.1	063.8	148.4	006.0000	0110.6	074.6	43.94
013.0	100.0000	0201.0	063.9	147.7	006.0000	0110.2	075.3	43.71
014.0	100.0000	0201.8	064.0	147.1	006.0000	0109.7	076.1	43.47
015.0	100.0000	0202.5	064.0	146.5	006.0000	0108.9	076.8	43.21
016.0	100.0000	0203.3	064.1	145.9	006.0000	0108.1	077.6	42.94

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
017.0	100.0000	0203.9	064.2	145.3	006.0000	0107.3	078.5	42.66
018.0	100.0000	0204.5	064.2	144.8	006.0000	0106.6	079.3	42.38
019.0	100.0000	0205.2	064.3	144.3	006.0000	0105.9	080.2	42.10
020.0	100.0000	0205.5	064.3	143.8	006.0000	0105.4	081.1	41.82
021.0	100.0000	0205.4	064.3	143.4	006.0000	0104.9	082.0	41.53
022.0	100.0000	0205.2	064.3	143.0	006.0000	0104.6	083.0	41.24
023.0	100.0000	0205.0	064.3	142.6	006.0000	0104.3	084.0	40.95
024.0	100.0000	0204.9	064.3	142.2	006.0000	0104.1	085.0	40.67
025.0	100.0000	0205.5	064.3	141.8	006.0000	0103.9	085.9	40.39
026.0	100.0000	0206.8	064.4	141.4	006.0000	0103.8	086.9	40.12
027.0	100.0000	0208.5	064.6	141.0	006.0000	0103.7	087.8	39.85
028.0	100.0000	0209.8	064.7	140.6	006.0000	0103.7	088.8	39.58
029.0	100.0000	0210.8	064.8	140.3	006.0000	0103.7	089.8	39.30
030.0	100.0000	0211.6	064.9	140.0	006.0000	0103.7	090.9	39.03
031.0	100.0000	0212.5	065.0	139.7	006.0000	0103.8	091.9	38.75
032.0	100.0000	0213.4	065.1	139.4	006.0000	0103.8	093.0	38.47
033.0	100.0000	0214.3	065.1	139.2	006.0000	0103.9	094.0	38.20
034.0	100.0000	0215.5	065.3	138.9	006.0000	0103.9	095.1	37.93
035.0	100.0000	0216.8	065.4	138.7	006.0000	0103.9	096.2	37.66
036.0	100.0000	0218.3	065.5	138.4	006.0000	0104.0	097.2	37.39
037.0	100.0000	0219.5	065.6	138.2	006.0000	0104.0	098.3	37.13
038.0	100.0000	0220.7	065.7	138.0	006.0000	0104.1	099.4	36.87
039.0	100.0000	0222.1	065.9	137.8	006.0000	0104.1	100.6	36.61
040.0	100.0000	0223.7	066.0	137.7	006.0000	0104.2	101.7	36.36
041.0	100.0000	0225.0	066.1	137.5	006.0000	0104.2	102.8	36.11
042.0	100.0000	0225.9	066.2	137.4	006.0000	0104.2	103.9	35.86
043.0	100.0000	0226.4	066.2	137.3	006.0000	0104.3	105.1	35.61
044.0	100.0000	0226.5	066.2	137.3	006.0000	0104.3	106.2	35.37
045.0	100.0000	0226.2	066.2	137.2	006.0000	0104.3	107.4	35.14
046.0	100.0000	0226.0	066.2	137.2	006.0000	0104.3	108.6	34.90
047.0	100.0000	0226.0	066.2	137.2	006.0000	0104.3	109.7	34.68
048.0	100.0000	0225.7	066.2	137.2	006.0000	0104.3	110.9	34.45
049.0	100.0000	0225.0	066.1	137.2	006.0000	0104.3	112.0	34.24

07-16-2007 NGDC 30 SEC Terrain Data

AP3032 BNPED20000204AAO
Channel = 213A
Max ERP = 6 kW
RCAMSL = 519.7 M
N. Lat. 47 33 21.0
W. Lng. 94 48 04.0
Protected
60 dBu

KBPR
Channel = 214C1
Max ERP = 100 kW
RCAMSL = 597 M
N. Lat. 46 25 21.0
W. Lng. 94 27 41.0
Interfering
54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
108.0	006.0000	0113.5	030.0	001.3	100.0000	0204.0	116.8	48.49
109.0	006.0000	0112.9	029.9	001.2	100.0000	0204.0	116.3	48.59
110.0	006.0000	0112.2	029.8	001.1	100.0000	0204.0	115.8	48.69
111.0	006.0000	0111.5	029.8	000.9	100.0000	0203.9	115.3	48.78
112.0	006.0000	0110.8	029.7	000.8	100.0000	0203.7	114.9	48.88
113.0	006.0000	0110.2	029.6	000.7	100.0000	0203.6	114.4	48.97
114.0	006.0000	0109.7	029.5	000.6	100.0000	0203.4	114.0	49.06
115.0	006.0000	0109.3	029.5	000.4	100.0000	0203.2	113.5	49.15
116.0	006.0000	0108.8	029.4	000.3	100.0000	0203.1	113.1	49.24
117.0	006.0000	0108.5	029.4	000.2	100.0000	0202.9	112.7	49.33
118.0	006.0000	0108.1	029.3	000.0	100.0000	0202.7	112.2	49.41
119.0	006.0000	0107.8	029.3	359.9	100.0000	0202.5	111.8	49.50
120.0	006.0000	0107.3	029.2	359.7	100.0000	0202.3	111.4	49.59
121.0	006.0000	0106.7	029.2	359.6	100.0000	0202.1	111.0	49.67
122.0	006.0000	0106.0	029.1	359.4	100.0000	0201.9	110.6	49.75
123.0	006.0000	0105.4	029.0	359.2	100.0000	0201.7	110.2	49.83
124.0	006.0000	0104.9	028.9	359.0	100.0000	0201.4	109.8	49.92
125.0	006.0000	0104.7	028.9	358.9	100.0000	0201.2	109.4	50.00
126.0	006.0000	0104.7	028.9	358.7	100.0000	0201.0	109.0	50.09
127.0	006.0000	0104.9	028.9	358.6	100.0000	0200.8	108.6	50.18
128.0	006.0000	0105.1	029.0	358.4	100.0000	0200.6	108.2	50.28
129.0	006.0000	0105.3	029.0	358.2	100.0000	0200.4	107.8	50.37
130.0	006.0000	0105.4	029.0	358.1	100.0000	0200.2	107.4	50.46
131.0	006.0000	0105.6	029.0	357.9	100.0000	0200.0	107.0	50.55
132.0	006.0000	0105.7	029.0	357.7	100.0000	0199.8	106.6	50.64
133.0	006.0000	0105.6	029.0	357.5	100.0000	0199.5	106.3	50.72
134.0	006.0000	0105.3	029.0	357.3	100.0000	0199.2	106.0	50.79
135.0	006.0000	0104.9	028.9	357.1	100.0000	0198.9	105.7	50.86
136.0	006.0000	0104.6	028.9	356.9	100.0000	0198.7	105.4	50.93
137.0	006.0000	0104.3	028.9	356.7	100.0000	0198.4	105.1	51.00
138.0	006.0000	0104.1	028.8	356.4	100.0000	0198.2	104.8	51.07
139.0	006.0000	0103.9	028.8	356.2	100.0000	0198.0	104.5	51.13
140.0	006.0000	0103.7	028.8	356.0	100.0000	0197.7	104.2	51.20
141.0	006.0000	0103.7	028.8	355.8	100.0000	0197.5	103.9	51.27

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
142.0	006.0000	0104.0	028.8	355.5	100.0000	0197.3	103.6	51.35
143.0	006.0000	0104.6	028.9	355.3	100.0000	0197.1	103.3	51.43
144.0	006.0000	0105.6	029.0	355.1	100.0000	0197.0	102.9	51.53
145.0	006.0000	0106.9	029.2	354.9	100.0000	0196.8	102.5	51.63
146.0	006.0000	0108.3	029.4	354.7	100.0000	0196.6	102.1	51.73
147.0	006.0000	0109.6	029.5	354.5	100.0000	0196.4	101.7	51.83
148.0	006.0000	0110.4	029.6	354.3	100.0000	0196.2	101.4	51.91
149.0	006.0000	0110.6	029.7	354.0	100.0000	0196.0	101.1	51.97
150.0	006.0000	0110.4	029.6	353.8	100.0000	0195.7	101.0	52.01
151.0	006.0000	0109.8	029.5	353.5	100.0000	0195.4	100.8	52.04
152.0	006.0000	0108.9	029.4	353.2	100.0000	0195.2	100.7	52.06
153.0	006.0000	0108.0	029.3	352.9	100.0000	0194.9	100.7	52.07
154.0	006.0000	0107.0	029.2	352.6	100.0000	0194.6	100.6	52.07
155.0	006.0000	0106.0	029.1	352.3	100.0000	0194.3	100.6	52.07
156.0	006.0000	0104.8	028.9	352.0	100.0000	0194.0	100.6	52.06
157.0	006.0000	0103.4	028.7	351.7	100.0000	0193.8	100.6	52.05
158.0	006.0000	0101.8	028.5	351.4	100.0000	0193.6	100.7	52.01
159.0	006.0000	0100.2	028.3	351.1	100.0000	0193.4	100.8	51.98
160.0	006.0000	0099.2	028.2	350.8	100.0000	0193.3	100.8	51.97
161.0	006.0000	0098.5	028.1	350.5	100.0000	0193.3	100.8	51.97
162.0	006.0000	0098.1	028.0	350.3	100.0000	0193.3	100.8	51.97
163.0	006.0000	0097.8	028.0	350.0	100.0000	0193.3	100.8	51.98
164.0	006.0000	0097.5	028.0	349.7	100.0000	0193.4	100.8	51.98
165.0	006.0000	0097.0	027.9	349.4	100.0000	0193.4	100.8	51.98
166.0	006.0000	0096.5	027.8	349.2	100.0000	0193.5	100.8	51.97
167.0	006.0000	0096.2	027.8	348.9	100.0000	0193.6	100.8	51.97
168.0	006.0000	0096.2	027.8	348.6	100.0000	0193.6	100.8	51.97
169.0	006.0000	0095.8	027.7	348.3	100.0000	0193.5	100.9	51.95
170.0	006.0000	0095.3	027.7	348.1	100.0000	0193.4	101.0	51.93
171.0	006.0000	0095.1	027.6	347.8	100.0000	0193.2	101.0	51.91
172.0	006.0000	0095.0	027.6	347.5	100.0000	0193.0	101.1	51.89
173.0	006.0000	0094.9	027.6	347.3	100.0000	0192.8	101.1	51.86
174.0	006.0000	0094.8	027.6	347.0	100.0000	0192.5	101.2	51.84
175.0	006.0000	0094.8	027.6	346.7	100.0000	0192.2	101.3	51.81
176.0	006.0000	0094.9	027.6	346.5	100.0000	0191.8	101.3	51.78
177.0	006.0000	0095.1	027.6	346.2	100.0000	0191.4	101.4	51.75
178.0	006.0000	0095.4	027.7	345.9	100.0000	0190.9	101.4	51.72
179.0	006.0000	0095.7	027.7	345.7	100.0000	0190.5	101.5	51.69
180.0	006.0000	0096.1	027.8	345.4	100.0000	0190.0	101.6	51.65
181.0	006.0000	0096.2	027.8	345.1	100.0000	0189.5	101.7	51.61
182.0	006.0000	0096.4	027.8	344.9	100.0000	0189.0	101.8	51.56
183.0	006.0000	0096.5	027.8	344.6	100.0000	0188.5	101.9	51.50
184.0	006.0000	0096.6	027.8	344.4	100.0000	0188.1	102.1	51.45
185.0	006.0000	0096.6	027.8	344.1	100.0000	0187.6	102.3	51.39
186.0	006.0000	0096.6	027.8	343.8	100.0000	0187.1	102.4	51.33
187.0	006.0000	0096.8	027.9	343.6	100.0000	0186.7	102.6	51.27
188.0	006.0000	0097.1	027.9	343.3	100.0000	0186.2	102.8	51.21
189.0	006.0000	0098.1	028.0	343.1	100.0000	0185.7	102.9	51.17
190.0	006.0000	0099.2	028.2	342.8	100.0000	0185.3	102.9	51.13
191.0	006.0000	0100.0	028.3	342.5	100.0000	0184.8	103.1	51.08
192.0	006.0000	0100.7	028.4	342.3	100.0000	0184.4	103.2	51.03

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
193.0	006.0000	0101.8	028.5	342.0	100.0000	0183.9	103.4	50.98
194.0	006.0000	0103.0	028.7	341.7	100.0000	0183.5	103.5	50.93
195.0	006.0000	0104.2	028.8	341.4	100.0000	0183.0	103.6	50.88
196.0	006.0000	0105.7	029.0	341.1	100.0000	0182.6	103.8	50.84
197.0	006.0000	0107.3	029.2	340.9	100.0000	0182.2	103.9	50.79
198.0	006.0000	0108.4	029.4	340.6	100.0000	0181.8	104.1	50.73
199.0	006.0000	0109.1	029.5	340.3	100.0000	0181.5	104.4	50.66
200.0	006.0000	0109.9	029.6	340.1	100.0000	0181.2	104.6	50.58
201.0	006.0000	0110.7	029.7	339.8	100.0000	0180.9	104.9	50.51
202.0	006.0000	0111.2	029.7	339.6	100.0000	0180.6	105.2	50.43
203.0	006.0000	0111.6	029.8	339.4	100.0000	0180.3	105.5	50.34
204.0	006.0000	0111.7	029.8	339.2	100.0000	0180.0	105.8	50.24
205.0	006.0000	0111.9	029.8	339.0	100.0000	0179.7	106.2	50.15
206.0	006.0000	0112.2	029.8	338.8	100.0000	0179.4	106.6	50.05
207.0	006.0000	0112.6	029.9	338.6	100.0000	0179.0	106.9	49.96
208.0	006.0000	0112.8	029.9	338.4	100.0000	0178.7	107.3	49.86
209.0	006.0000	0112.7	029.9	338.2	100.0000	0178.4	107.7	49.75
210.0	006.0000	0112.3	029.9	338.1	100.0000	0178.1	108.1	49.65
211.0	006.0000	0112.0	029.8	337.9	100.0000	0177.8	108.6	49.54
212.0	006.0000	0111.7	029.8	337.8	100.0000	0177.6	109.0	49.43
213.0	006.0000	0111.4	029.7	337.6	100.0000	0177.3	109.5	49.33
214.0	006.0000	0111.2	029.7	337.5	100.0000	0177.1	109.9	49.22
215.0	006.0000	0111.1	029.7	337.4	100.0000	0176.8	110.3	49.12
216.0	006.0000	0111.1	029.7	337.2	100.0000	0176.5	110.8	49.01
217.0	006.0000	0110.9	029.7	337.1	100.0000	0176.3	111.3	48.91
218.0	006.0000	0110.4	029.6	337.0	100.0000	0176.1	111.7	48.80
219.0	006.0000	0109.6	029.5	336.9	100.0000	0176.0	112.2	48.70
220.0	006.0000	0108.8	029.4	336.9	100.0000	0175.8	112.7	48.59
221.0	006.0000	0108.1	029.3	336.8	100.0000	0175.7	113.2	48.49
222.0	006.0000	0107.4	029.2	336.7	100.0000	0175.6	113.7	48.38
223.0	006.0000	0106.4	029.1	336.7	100.0000	0175.5	114.2	48.28
224.0	006.0000	0105.2	029.0	336.6	100.0000	0175.5	114.8	48.17
225.0	006.0000	0104.0	028.8	336.6	100.0000	0175.4	115.3	48.06
226.0	006.0000	0102.9	028.7	336.6	100.0000	0175.4	115.8	47.96
227.0	006.0000	0102.2	028.6	336.6	100.0000	0175.3	116.3	47.86
228.0	006.0000	0101.8	028.5	336.5	100.0000	0175.2	116.8	47.76

Channel-Six TV Protection Study

Exhibit #19

KBJRTV LI 06+ 2C Dom Int 100.000 kW 302 M HAAT VHY
Superior WI 603.8 M COR AMSL
Lat= 46 47 21.0, Lng= 92 06 51.0
Kbjr License, Inc. BLCT20000517AEX
Fac ID# 33658, Cutoff Date=53897628
Dist.=184.4 km, Azi=76.3°, Rev Azi=258.0°

Direct line HAAT Grade B, 47 dBu= 95.02 km & Grade A= 47.76 km

Distance from reference to Grade B = 89.37 km
Cutoff Dist from Full Service or Class CA= 187
Maximum Co-located power= 46.8 kW
KBJRTV Signal Contour at Reference location = 25.4 dBu
CH. 214, U/D ratio = 24.8 dB, Maximum FM signal = 71.8 dBu , add 6 dB if within angle.

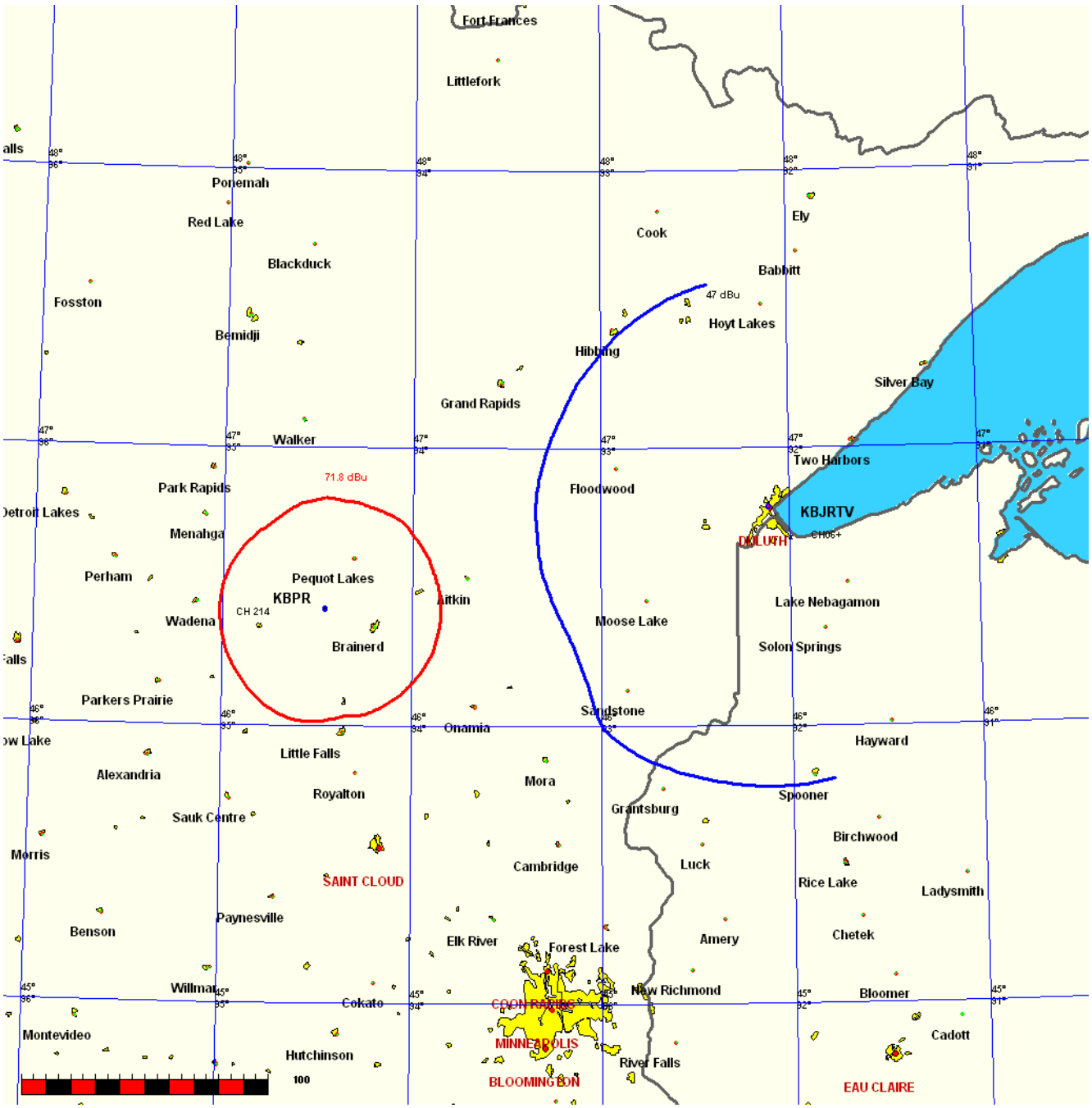
TV/FM D to U values

47.0	71.8	55.0	69.2	63.0	70.6	71.0	76.0	79.0	82.0	87.0	88.4
48.0	71.2	56.0	69.2	64.0	71.0	72.0	76.6	80.0	82.8	88.0	89.0
49.0	70.6	57.0	69.2	65.0	71.4	73.0	77.3	81.0	83.7	89.0	89.5
50.0	70.0	58.0	69.2	66.0	72.2	74.0	78.0	82.0	84.5	90.0	90.3
51.0	69.7	59.0	69.3	67.0	73.0	75.0	78.8	83.0	85.4	91.0	90.3
52.0	69.5	60.0	69.6	68.0	73.8	76.0	79.6	84.0	86.2	92.0	90.3
53.0	69.2	61.0	69.9	69.0	74.5	77.0	80.4	85.0	87.1	93.0	90.3
54.0	69.2	62.0	70.2	70.0	75.2	78.0	81.2	86.0	87.9	94.0	90.3

FMCommander Single Allocation Study
07-17-2007

KBPR (New) CH 214 C1
102.5 kW 597 M COR - Study Power
Intef. = 71.8 dBu
Scale = 1:4,000,000

KBJRTV CH 06+ 2C BLCT20000517AEX
100.0 kW, 603.8 M COR
Prot. = 47 dBu



07-17-2007 NGDC 30 SEC Terrain Data

KBJRTV BLCT20000517AEX
Channel = 06+2C
Max ERP = 100 kW
RCAMSL = 603.8 M
N. Lat. 46 47 21.0
W. Lng. 92 06 51.0
Protected
47 dBu

KBPR (New)
Channel = 214C1
Study Max ERP = 102.5 kW
RCAMSL = 597 M
N. Lat. 46 25 21.0
W. Lng. 94 27 41.0
Interfering
71.75 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
198.0	100.0000	0412.7	112.5	113.7	102.5000	0231.1	160.6	40.93
199.0	100.0000	0413.3	112.6	113.8	102.5000	0231.1	159.0	41.22
200.0	100.0000	0413.7	112.6	113.9	102.5000	0231.1	157.0	41.57
201.0	100.0000	0413.8	112.6	113.9	102.5000	0231.1	155.0	41.91
202.0	100.0000	0413.8	112.6	114.0	102.5000	0231.1	153.1	42.26
203.0	100.0000	0414.5	112.7	114.0	102.5000	0231.1	151.1	42.61
204.0	100.0000	0415.9	112.8	114.1	102.5000	0231.1	149.1	42.96
205.0	100.0000	0417.3	112.9	114.2	102.5000	0231.0	147.1	43.31
206.0	100.0000	0418.2	113.0	114.2	102.5000	0231.0	145.2	43.67
207.0	100.0000	0418.5	113.0	114.2	102.5000	0231.0	143.2	44.03
208.0	100.0000	0417.8	113.0	114.2	102.5000	0231.0	141.2	44.40
209.0	100.0000	0416.3	112.8	114.1	102.5000	0231.1	139.2	44.78
210.0	100.0000	0414.5	112.7	113.9	102.5000	0231.1	137.3	45.16
211.0	100.0000	0412.9	112.5	113.8	102.5000	0231.1	135.3	45.53
212.0	100.0000	0411.5	112.4	113.6	102.5000	0231.1	133.4	45.91
213.0	100.0000	0410.1	112.3	113.5	102.5000	0231.2	131.4	46.29
214.0	100.0000	0408.7	112.1	113.3	102.5000	0231.2	129.5	46.67
215.0	100.0000	0406.7	112.0	113.1	102.5000	0231.2	127.6	47.04
216.0	100.0000	0403.1	111.6	112.7	102.5000	0231.2	125.7	47.41
217.0	100.0000	0397.2	111.1	112.3	102.5000	0231.2	124.0	47.77
218.0	100.0000	0389.1	110.4	111.8	102.5000	0231.2	122.2	48.11
219.0	100.0000	0378.8	109.5	111.1	102.5000	0231.1	120.6	48.44
220.0	100.0000	0366.2	108.5	110.4	102.5000	0230.9	119.1	48.75
221.0	100.0000	0351.3	107.4	109.6	102.5000	0230.7	117.7	49.05
222.0	100.0000	0335.4	106.2	108.7	102.5000	0230.5	116.4	49.33
223.0	100.0000	0319.9	105.1	107.8	102.5000	0230.2	115.1	49.60
224.0	100.0000	0305.5	104.0	106.9	102.5000	0229.8	113.9	49.85
225.0	100.0000	0293.2	103.0	106.1	102.5000	0229.5	112.8	50.11
226.0	100.0000	0283.6	102.1	105.2	102.5000	0229.3	111.6	50.37
227.0	100.0000	0276.2	101.5	104.5	102.5000	0229.2	110.4	50.65
228.0	100.0000	0269.5	100.8	103.7	102.5000	0229.2	109.2	50.95
229.0	100.0000	0262.6	100.2	102.9	102.5000	0229.5	108.1	51.23
230.0	100.0000	0255.6	099.5	102.1	102.5000	0229.9	107.1	51.51
231.0	100.0000	0248.7	098.8	101.2	102.5000	0230.2	106.1	51.78
232.0	100.0000	0242.4	098.2	100.4	102.5000	0230.5	105.2	52.05

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
233.0	100.0000	0237.0	097.7	099.5	102.5000	0230.7	104.3	52.31
234.0	100.0000	0232.5	097.3	098.7	102.5000	0230.7	103.3	52.58
235.0	100.0000	0228.8	096.9	097.9	102.5000	0230.5	102.4	52.84
236.0	100.0000	0226.0	096.6	097.1	102.5000	0230.2	101.4	53.12
237.0	100.0000	0223.7	096.4	096.3	102.5000	0230.0	100.5	53.39
238.0	100.0000	0221.9	096.2	095.5	102.5000	0229.8	099.5	53.66
239.0	100.0000	0220.4	096.1	094.6	102.5000	0229.5	098.6	53.92
240.0	100.0000	0219.2	096.0	093.8	102.5000	0229.3	097.7	54.19
241.0	100.0000	0218.4	095.9	093.0	102.5000	0229.3	096.8	54.45
242.0	100.0000	0217.9	095.8	092.1	102.5000	0229.2	096.0	54.71
243.0	100.0000	0217.3	095.8	091.2	102.5000	0229.1	095.2	54.96
244.0	100.0000	0216.8	095.7	090.3	102.5000	0229.0	094.4	55.18
245.0	100.0000	0216.2	095.7	089.4	102.5000	0229.0	093.7	55.40
246.0	100.0000	0215.6	095.6	088.4	102.5000	0228.9	093.1	55.59
247.0	100.0000	0215.0	095.6	087.4	102.5000	0228.8	092.5	55.77
248.0	100.0000	0214.6	095.5	086.5	102.5000	0228.6	091.9	55.94
249.0	100.0000	0214.6	095.5	085.5	102.5000	0228.4	091.4	56.10
250.0	100.0000	0214.6	095.5	084.5	102.5000	0228.3	090.9	56.24
251.0	100.0000	0214.4	095.5	083.4	102.5000	0228.1	090.5	56.36
252.0	100.0000	0214.0	095.5	082.4	102.5000	0227.9	090.2	56.46
253.0	100.0000	0213.5	095.4	081.3	102.5000	0227.7	089.9	56.54
254.0	100.0000	0213.0	095.4	080.3	102.5000	0227.4	089.7	56.59
255.0	100.0000	0212.6	095.3	079.2	102.5000	0227.0	089.6	56.62
256.0	100.0000	0212.1	095.3	078.1	102.5000	0226.3	089.5	56.62
257.0	100.0000	0211.2	095.2	077.1	102.5000	0225.7	089.5	56.59
258.0	100.0000	0209.5	095.0	076.0	102.5000	0225.1	089.7	56.52
259.0	100.0000	0207.4	094.8	074.9	102.5000	0224.5	089.9	56.42
260.0	100.0000	0205.4	094.6	073.9	102.5000	0223.9	090.2	56.30
261.0	100.0000	0204.2	094.5	072.9	102.5000	0223.2	090.5	56.19
262.0	100.0000	0203.6	094.5	071.8	102.5000	0222.7	090.8	56.08
263.0	100.0000	0203.0	094.4	070.8	102.5000	0222.7	091.2	55.98
264.0	100.0000	0202.4	094.3	069.8	102.5000	0223.0	091.5	55.86
265.0	100.0000	0202.4	094.3	068.8	102.5000	0223.4	091.9	55.76
266.0	100.0000	0202.8	094.4	067.8	102.5000	0223.8	092.4	55.64
267.0	100.0000	0203.2	094.4	066.8	102.5000	0224.3	092.8	55.51
268.0	100.0000	0202.9	094.4	065.9	102.5000	0224.7	093.4	55.35
269.0	100.0000	0202.1	094.3	065.0	102.5000	0225.1	094.1	55.15
270.0	100.0000	0201.4	094.2	064.1	102.5000	0225.3	094.8	54.93
271.0	100.0000	0200.6	094.2	063.2	102.5000	0225.4	095.6	54.70
272.0	100.0000	0199.7	094.1	062.3	102.5000	0225.4	096.4	54.44
273.0	100.0000	0198.5	093.9	061.5	102.5000	0225.2	097.3	54.16
274.0	100.0000	0197.1	093.8	060.8	102.5000	0225.0	098.3	53.86
275.0	100.0000	0195.5	093.6	060.0	102.5000	0224.6	099.3	53.55
276.0	100.0000	0194.0	093.5	059.3	102.5000	0224.1	100.4	53.22
277.0	100.0000	0192.6	093.3	058.6	102.5000	0223.8	101.4	52.90
278.0	100.0000	0191.2	093.2	057.9	102.5000	0223.6	102.6	52.58
279.0	100.0000	0189.8	093.1	057.3	102.5000	0223.5	103.7	52.25
280.0	100.0000	0188.2	092.9	056.7	102.5000	0223.6	104.9	51.92
281.0	100.0000	0186.6	092.7	056.1	102.5000	0223.7	106.1	51.60
282.0	100.0000	0185.1	092.6	055.5	102.5000	0223.8	107.3	51.27
283.0	100.0000	0183.8	092.4	055.0	102.5000	0223.7	108.6	50.95

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
284.0	100.0000	0182.4	092.3	054.4	102.5000	0223.5	109.9	50.63
285.0	100.0000	0181.0	092.2	054.0	102.5000	0223.2	111.2	50.31
286.0	100.0000	0179.6	092.0	053.5	102.5000	0222.9	112.5	49.99
287.0	100.0000	0178.3	091.9	053.0	102.5000	0222.5	113.8	49.68
288.0	100.0000	0176.9	091.7	052.6	102.5000	0222.3	115.2	49.38
289.0	100.0000	0175.6	091.6	052.2	102.5000	0222.1	116.6	49.08
290.0	100.0000	0174.4	091.5	051.8	102.5000	0222.1	118.0	48.78
291.0	100.0000	0173.3	091.3	051.5	102.5000	0222.3	119.4	48.49
292.0	100.0000	0172.3	091.2	051.1	102.5000	0222.5	120.8	48.20
293.0	100.0000	0171.7	091.2	050.8	102.5000	0222.8	122.2	47.92
294.0	100.0000	0171.5	091.1	050.4	102.5000	0223.2	123.6	47.65
295.0	100.0000	0171.5	091.1	050.1	102.5000	0223.6	125.0	47.37
296.0	100.0000	0171.5	091.1	049.8	102.5000	0224.0	126.4	47.10
297.0	100.0000	0171.5	091.1	049.5	102.5000	0224.4	127.9	46.83
298.0	100.0000	0171.6	091.2	049.2	102.5000	0224.7	129.3	46.55
299.0	100.0000	0172.0	091.2	048.9	102.5000	0225.0	130.8	46.28
300.0	100.0000	0172.8	091.3	048.6	102.5000	0225.3	132.2	46.00
301.0	100.0000	0173.6	091.4	048.4	102.5000	0225.5	133.7	45.72
302.0	100.0000	0174.3	091.4	048.1	102.5000	0225.7	135.2	45.43
303.0	100.0000	0174.5	091.5	047.9	102.5000	0225.8	136.7	45.14
304.0	100.0000	0174.0	091.4	047.8	102.5000	0225.8	138.2	44.85
305.0	100.0000	0173.0	091.3	047.6	102.5000	0225.9	139.8	44.55
306.0	100.0000	0171.9	091.2	047.5	102.5000	0225.9	141.4	44.26
307.0	100.0000	0171.0	091.1	047.4	102.5000	0225.9	142.9	43.96
308.0	100.0000	0170.4	091.0	047.3	102.5000	0225.9	144.5	43.68
309.0	100.0000	0170.1	091.0	047.2	102.5000	0225.9	146.1	43.39
310.0	100.0000	0170.3	091.0	047.1	102.5000	0226.0	147.6	43.12
311.0	100.0000	0171.1	091.1	047.0	102.5000	0226.0	149.2	42.84
312.0	100.0000	0172.2	091.2	046.9	102.5000	0226.0	150.7	42.57
313.0	100.0000	0173.3	091.3	046.8	102.5000	0226.0	152.3	42.29
314.0	100.0000	0174.3	091.4	046.7	102.5000	0226.0	153.9	42.02
315.0	100.0000	0175.1	091.5	046.6	102.5000	0226.0	155.4	41.74
316.0	100.0000	0175.6	091.6	046.6	102.5000	0226.0	157.0	41.46
317.0	100.0000	0175.9	091.6	046.5	102.5000	0226.0	158.6	41.19
318.0	100.0000	0176.0	091.6	046.5	102.5000	0225.9	160.2	40.91

EXHIBIT #22

R.F. EMISSION COMPLIANCE STATEMENT

Minnesota Public Radio
Minor Change to Licensed Station
KBPR
BLED-19880222KG
Brainerd, MN

July 2007

CH 214C1 100 kW H & V

The proposed eight-bay, circularly polarized antenna will be energized such that it produces 100 kW effective radiated power from a center of radiation of 179 meters above ground. Using 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, and then by applying a combination of the element and array pattern as defined in E.P.A. study PB85-245868 ("**Engineering Assessment of the Potential Impact of the Federal Radiation Protection Guidance on the AM, FM and TV Broadcast Services**") the predicted level of RF non-ionization emissions at a position of 2 meters above ground (head-height) at the base of the tower for the proposed 8-bay ERI/Harris FMH-8AC (Type #3) antenna is 6.398 microwatts per square centimeter ($\mu W/cm^2$), which is 0.6398 percent of the maximum for a controlled area and 3.1991 percent of maximum for an uncontrolled area.

There are other sources of RF on the tower, however since the predicted level of emissions for KBPR is less than 5% of maximum, no further calculations were deemed necessary.

The applicant will protect workers on the tower by either reducing ERP or terminating transmission.

Consequently, it appears that the proposed FM translator will be in full compliance with the Commission's human exposure to radiofrequency electromagnetic field rules and regulations.