Federal Communications Commission
Washington, D.C. 20554

Approved by OMB
3060-0034 (March 2001)

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 - 20051222ABR

Section I - General Information

1. Legal Name of the Licensee/Permittee
MINNESOTA PUBLIC RADIO

Mailing Address
480 CEDAR STREET

City	State or Country (if foreign address)	Zip Code
ST. PAUL	MN	55101 -

Telephone Number (include area code)	E-Mail Address (if available)
6512901259	FCCFILING@MPR.ORG

Call Sign	Facility Identifier
KMSE	83876

2. Contact Representative (if other than licensee/Permittee)
TODD STANSBURY

Firm or Company Name
WILEY REIN & FIELDING

Telephone Number (include area code)	E-Mail Address (if available)
2027194948	TSTANSBU@WRF.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 Change in licensed facility
○ Minor Change in licensed facility
○ Major Modification of construction permit
○ Minor Modification of construction permit
○ 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: ROCHESTER 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 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.	◉ Yes ○ No
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	○ Yes ◉ No
	b. a governmental entity other than a school; or	○ Yes ◉ No
	c. a nonprofit educationl organization, other than described in a. or b.	◉ 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,	○ Yes ○ No

	or provision of the Communications Act of 1934, as amended.	
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 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.	○ Yes ○ No See Explanation in [Exhibit 6]
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	○ Yes ○ No

	responsive to the issues of public concern facing the station's community of license and service area.	
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 compelling showing that the downgrade would be in the public interest.	○ Yes ○ No
	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	○ Yes ○ No [Exhibit 12]

	full service station (i.e., upon its filing of a license application and receipt of program test authority).	
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	Typed or Printed Title of Person Signing
THOMAS J KIGIN	EXECUTIVE VICE PRESIDENT

Signature	Date
	1/30/2006

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	Relationship to Applicant (e.g., Consulting Engineer)
DOUG VERNIER	ENGINEERING CONSULTANT
Signature	Date
	1/27/2006

Mailing Address
721 W. FIRST ST., SUITE A

City	State or Country (if foreign address)	Zip Code
CEDAR FALLS	IA	50613-
Telephone Number (include area code)	E-Mail Address (if available)	
3192668402	DVERNIER@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 on Channels 200-220

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: 204		
2.	Class (select one): ○ D ◉ A ○ B1 ○ B ○ C3 ○ C2 ○ C1 ○ C0 ○ C		
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 44 Minutes 2 Seconds 28 ◉ North ○ South Longitude: Degrees 92 Minutes 20 Seconds 25 ◉ West ○ East		
4.	Antenna Structure Registration Number: 1029133 ☐ Not Applicable ☐ Notification filed with FAA		
5.	Antenna Location Site Elevation Above Mean Sea Level:	379.8 meters	
6.	Overall Tower Height Above Ground Level:	302.7 meters	
7.	Height of Radiation Center Above Ground Level:	138.7 meters(H)	141.7 meters(V)
8.	Height of Radiation Center Above Average Terrain:	167.9 meters(H)	170.9 meters(V)

9.	Effective Radiated Power:	0.006 kW(H)	0.25 kW(V)
10.	Maximum Effective Radiated Power: (Beam-Tilt Antenna ONLY) ☑ Not Applicable	kW(H)	kW(V)

11. 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.

12. **Main Studio Location.** The proposed main studio location complies with 47 C.F.R. Section 73.1125. ◉ Yes ○ No

See Explanation in [Exhibit 13]

13. **Interference.** The proposed facility complies with all of the following applicable rule sections. ◉ Yes ○ No

Check all that apply:

See Explanation in [Exhibit 14]

Contour Overlap Requirements.

a. ☑ 47 C.F.R. Section 73.509

Exhibit Required. [Exhibit 15]

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 16]

Contour Protection.

d. ☐ 47 C.F.R. Section 73.215(a) with respect to station(s)

Exhibit Required. [Exhibit 17]

Television Channel 6 Protection.

e. ☑ 47 C.F.R. Section 73.525 with respect to station(s)

Exhibit Required. [Exhibit 18]

14. **Reserved Channels Above 220.**

	a. **Allotment.** The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203.	○ Yes ○ No See Explanation in [Exhibit 19]
	b. **Community Coverage.** The proposed facility complies with 47 C.F.R. Section 73.315.	○ Yes ○ No See Explanation in [Exhibit 20]
15.	**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]
16.	**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]

PREPARER'S CERTIFICATION ON PAGE 8 MUST BE COMPLETED AND SIGNED.

Exhibits

Exhibit 1
Description: ENGINEERING STATEMENT

THIS EXHIBIT DESCRIBES THE PROPOSED MINOR CHANGE AMENDMENTS TO THE KMSE PENDING MINOR CHANGE APPLICATION.

Attachment 1

Description
Engineering Statement

Attachment 13

Exhibit 15
Description: CONTOUR-TO-CONTOUR ALLOCATION STUDY

THE ATTACHED EXHIBIT SHOWS THAT CONTOUR OVERLAP WILL NOT BE CAUSED TO OTHER

LICENSED STATIONS, CONSTRUCTION PERMITS OR APPLICATIONS. NEITHER WILL CONTOUR OVERLAP BE RECEIVED.

Attachment 15

Description
Allocation Study

Exhibit 18
Description: CHANNEL-SIX TV PROTECTION

THIS EXHIBIT SHOWS THAT THE APPLICANT MEETS THE REQUIREMENTS OF SECTION 73.525 WITH REGARD TO THE PROTECTION OF CHANNEL-SIX TELEVISION FROM INTERFERENCE.

Attachment 18

Description
Channel-Six TV Exhibit

Exhibit 22
Description: R.F. EMISSIONS SAFETY EXHIBIT

THE ATTACHED EXHIBIT DETAILS THE APPLICANT'S ANALYSIS OF R.F. EMISSIONS SAFETY AT THE PROPOSED TOWER SITE.

Attachment 22

Description
R.F. Emissions Study

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

ENGINEERING STATEMENT

Exhibit #1

Concerning the Application of
Minnesota Public Radio
To Move the Location of KMSE
BPED 20051222ABR
Channel 204
Rochester, Minnesota

January 2006

This engineering statement supports the amendment of the application of the Minnesota Public Radio of Saint Paul, Minnesota to move the transmitter location of KMSE 130 meters to the south, south east. This amendment lowers the antennae heights above ground and increases the ERP from 0.2 kW to 0.25 kW. This new combination of power and antenna height will yield an equivalent 60 dBu contour distance to that which was proposed in the initial application for construction permit. No other changes from are requested.

The applicant proposes the following parameters:

NAD 27 Coordinates

N. Lat. 44 02 28
W. Lng. 92 20 25

Elevation: 379.8 meters

Antenna height: 138.7 meters AG (Horizontal element)

141.7 meters AG (Vertical element)

Proposed ERP: 0.25 kW Vertical Polarization
0.006 kW Horizontal Polarization

Page #3 of this Exhibit is a coverage map showing the existing and proposed 60 dBu

KMSE coverage. Page #4 is a distance to contour table showing the distances to the 60 dBu along the eight cardinal radials used to calculate the station's HAAT. Page #5 of this exhibit is a statement of the qualifications of the preparer.

Exhibit 15 is an allocation study showing that no overlap interference is caused to station licenses, construction permits and applications. Page #1 of this exhibit is a tabular study showing the proposed KMSE's relationship to all stations, construction permits and applications having a frequency and distance relationship. Page #2 of this study is a narrative explaining the abbreviations and conventions used in the channel printout. Pages #3 through #9 of this exhibit are allocation maps and "FMOVER" tabular studies showing the contour to contour relationship of the proposed facility to KBDC.CP, Mason City, IA

Exhibit 18 is a channel-six TV exhibit, showing that all provisions of Section 73.525 of the Commission's Rules and Regulation with regard to protection of channel-six TV are met. The first map in this exhibit calculates the existing KMSE population within the area of interference predicted to be caused KAAL-TV6 in Austin, Minnesota. This amounts to 3,180 people. The second map in this exhibit shows the interference area calculated at the new antenna height and power at the newly proposed tower site location. This map study shows that 3,133 people are predicted to be caused interference. Our calculations show that while no new people now fall within the new calculated interference area, some 47 people now fall outside the new interference area. Therefore, for every new person that was added to the new interference area, more than 2 people were removed from the interference area. The map shows the existing interference area contained by a red line while the newly calculated interference is delineated by a black line. There are no other channel-six TV stations within the Section 73.525 cutoff distance for FM channel 204 of 235 kilometers.

Exhibit 22 is an RF hazard statement showing that workers and the general public are protected from radio frequency emissions.

The proposed station is not within 320 kilometers of the US border with Mexico or Canada. It is not within the specific critical distances to AM broadcast towers and the proposed facility meets the requirements with respect to FCC monitoring stations, Table Mountain and the West Virginia Quite Zone. There are four other FM stations located on the proposed tower. These are KZSE, KLSE, KRPR and KNXR. Based on the low ERP of the proposed facility, little or no interaction between the proposed station and other stations at the site is anticipated. The applicant is aware of its responsibility under the rules to correct any interference it may cause these stations through a mixing of its signal at the IPA level or otherwise with other transmitters. Further, the applicant is aware if its responsibility to correct any blanketing interference, within one year, that it may cause at the proposed location.

Doug Vernier

KMSE Proposed 60 dBu and Change Area

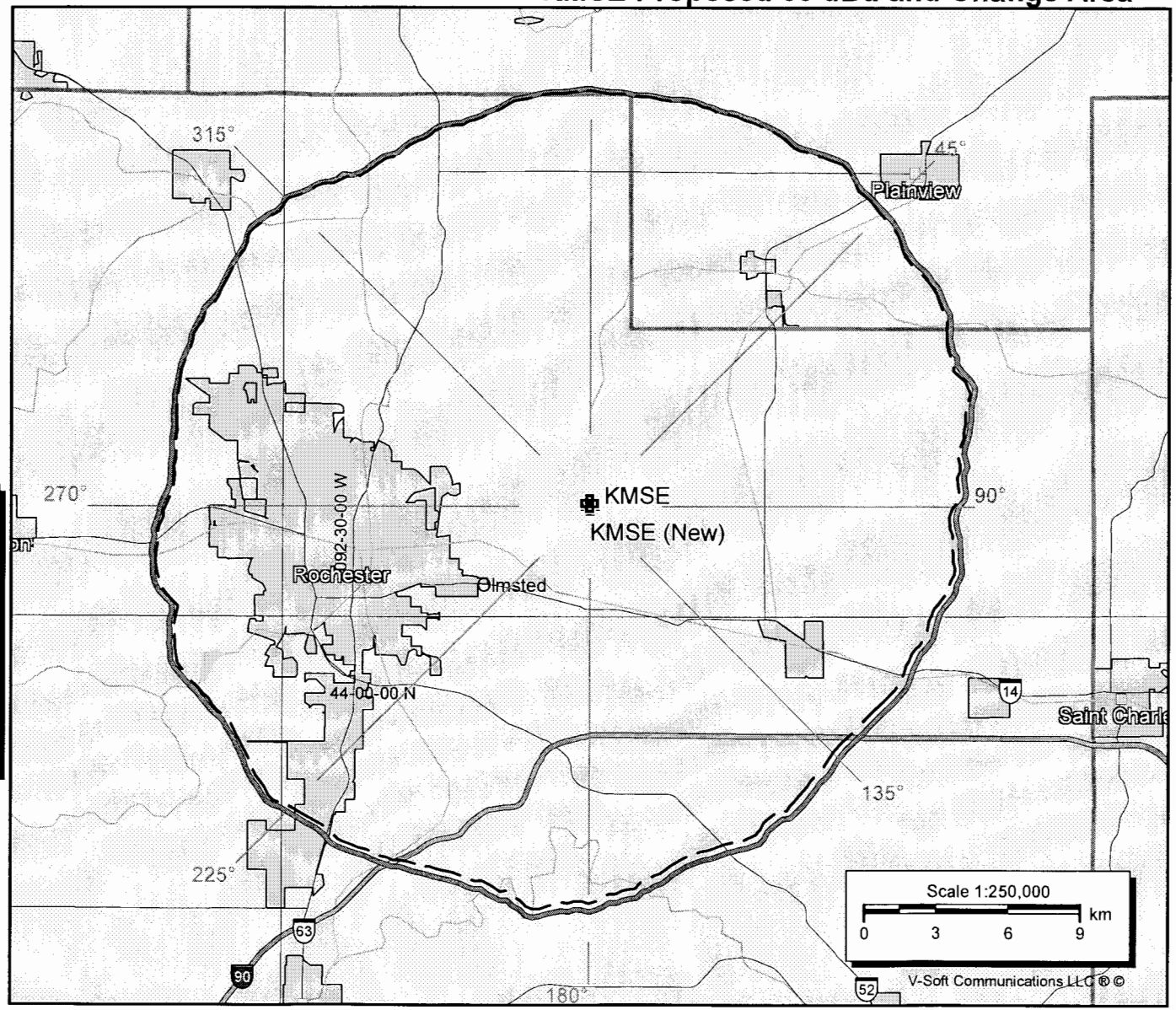
KMSE (New) Red Line

Latitude: 44-02-28 N
Longitude: 092-20-25 W
ERP: 0.25 kW Vert
Channel: 204
Frequency: 88.7 MHz
AMSL Height: 522.0 m
Elevation: 379.8 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Population = 106,632
Area = 892.9 sq km

KMSE (Existing) Dashed
BLED19980729KB
Latitude: 44-02-32 N
Longitude: 092-20-26 W
ERP: 0.25 kW
Channel: 204
Frequency: 88.7 MHz
AMSL Height: 518.0 m
Elevation: 382.0 m
Horiz. Pattern: Omni
Vert. Pattern: No

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



Doug Vernier, Telecommunications Consultants
N. Lat. = 44 02 28 W. Lng. = 92 20 25
HAAT and Distance to Contour - FCC Method - 30 Arc Sec.

Minnesota Public Radio

Azi.	AV EL	HAAT	ERP kW	dBk	Field	60-F5
000	347.8	174.2	0.2500	-6.02	1.000	17.34
045	345.7	176.3	0.2500	-6.02	1.000	17.45
090	373.8	148.2	0.2500	-6.02	1.000	15.78
135	385.5	136.5	0.2500	-6.02	1.000	15.03
180	355.8	166.2	0.2500	-6.02	1.000	16.90
225	336.4	185.6	0.2500	-6.02	1.000	17.88
270	333.5	188.5	0.2500	-6.02	1.000	18.02
315	330.7	191.3	0.2500	-6.02	1.000	18.14

Ave El= 351.14 M HAAT= 170.86 M AMSL= 522

Declaration:

I, Douglas L. Vernier, declare that I have received training as an engineer from the University of Michigan School of Engineering. That, I have received degrees from the University in the field of Broadcast Telecommunications. That, I have been active in broadcast consulting for over 30 years;

That, I have held a Federal Communications Commission First Class Radiotelephone License continually since 1964. In 1985, this license was reissued by the Commission as a lifetime General Radiotelephone license no. PG-16-16464;

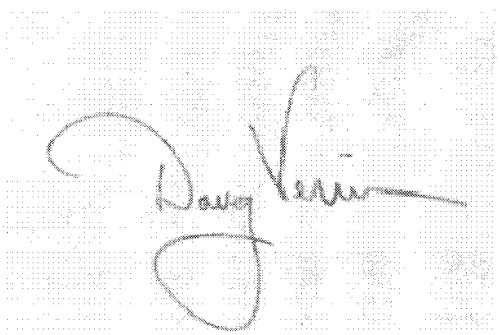
That, I am certified as a Professional Broadcast Engineer (#50258) by the Society of Broadcast Engineers, Indianapolis, Indiana. (Re-certified 9/2005.)

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

That, I have been retained the Minnesota Public Radio, of Saint Paul, Minnesota to prepare the engineering showings appended hereto:

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

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



Douglas L. Vernier

Executed on January 26, 2005

Exhibit #15

KMSE Allocation Study
Minnesota Public Radio

REFERENCE CH# 204A - 88.7 MHz, Pwr= 0.25 kW, HAAT=170.9 M, COR= 522 M DISPLAY DATES
44 02 28 N. Average Protected F(50-50)= 17.16 km DATA 01-26-06
92 20 25 W. Ave. F(50-10) 40 dBu= 54.6 54 dBu= 25.6 80 dBu= 5.3 100 dBu= 1.1 SEARCH 01-26-06

CH CALL CITY	TYPE STATE	AZI. DIST <-- FILE #	LAT. LNG.	Pwr(kW) COR(M) HAAT(M) INT(km)	PRO(km) LICENSEE	*IN* *OUT* (Overlap in km)
204A KMSE.A Rochester	APP EX MN	0.0 0.00 0.0 BPED20051222ABR	44 02 28 92 20 25	0.200 543 195 54.9	17.3 Minnesota Public Radio	-72.26* -72.25*
204A KMSE Rochester	LIC EN MN	349.9 0.13 169.9 BLED19980729KB	44 02 32 92 20 26	0.250 518 151 51.9	15.9 Minnesota Public Radio	-68.92* -70.38*
203C1 KBDC.C Mason City	CP VN IA	225.3 105.28 44.7 BPED19981230ME	43 22 21 93 15 57	66.000 522 152 82.4	55.0 American Family Associatio	4.97 23.63
205C2 WLSU La Crosse	LIC DCX WI	108.3 82.36 289.0 BLED20030624ABF	43 48 17 91 22 06	1.414 546 213 43.2	28.6 Board.of Regents, Univ.of	23.88 30.78
204A KLNI Decorah	LIC CN IA	152.1 91.89 332.4 BLED19931202KA	43 18 35 91 48 30	0.100 324 20 18.6	5.6 Minnesota Public Radio	57.24 34.08
204A WRFW River Falls	LIC CN WI	345.2 97.13 165.0 BLED1630	44 53 08 92 39 20	3.000 351 46 62.2	16.4 Board Of Regents, Universi	17.85 26.41
201A APZ01 Byron	APP V MN	286.8 29.19 106.6 BNPED20000118AES	44 06 59 92 41 22	0.170 507 172 0.9	15.5 Pensacola Christian Colleg	10.14 12.59
207C1 KCMP Northfield	LIC CY MN	321.3 92.66 140.8 BLED19911203KB	44 41 19 93 04 22	100.000 516 223 8.7	65.9 Minnesota Public Radio	66.51 25.63
207C1 KCMP.A Northfield	APP CY MN	321.3 92.70 140.8 BPED20051117ADL	44 41 21 93 04 21	100.000 517 224 8.7	66.0 Minnesota Public Radio	66.52 25.56
257C3 KWNOFM Rushford	LIC ZCN MN	102.3 51.02 282.7 BLH19950130KC	43 56 32 91 43 09	7.889 481 124 36.5	33.3 Kage, Inc	12.0R 39.0M
202C1 WHWC Menomonie	LIC DCY WI	18.5 118.03 198.9 BLED19980904KB	45 02 49 91 51 47	31.943 625 338 7.7	63.6 State Of Wisconsin - Educa	92.95 53.29
201A KRLX Northfield	LIC CN MN	306.0 80.11 125.4 BLED19851024KG	44 27 39 93 09 21	0.100 309 -4 0.7	5.6 Carleton College	61.31 73.37
205C3 KWVI.A Waverly	APP DVX IA	176.6 139.33 356.7 BMPED20050629ACB	42 47 21 92 14 22	20.000 400 91 55.7	35.7 American Family Associatio	67.01 78.77
06+2C KBJRTV Superior	LI HY WI	3.2 305.93 183.4 BLCT20000517AEX	46 47 21 92 06 51	100.000 603 407 22.6	112.0 Kbjr License, Inc.	235.0R 70.9M
06Z1C WITI Milwaukee	LI N WI	104.9 374.17 288.0 BLCT19990129KT	43 05 26 87 53 50	100.000 511 295 20.3	103.1 Witi License,inc.	235.0R 139.2M
06-2C KAAL Austin	LI HN MN	235.1 79.87 54.6 BLCT2236	43 37 42 93 09 12	100.000 696 318 23.4	105.0 Kaal-tv, Llc	235.0R -155.1M
06+2C KWQCTV Davenport	LI HY IA	150.6 316.26 331.9 BLCT19821108KN	41 32 49 90 28 35	100.000 611 385 20.9	110.0 Young Broadcasting Of Dave	235.0R 81.3M

ERP and HAAT are on direct line to and from reference station.
• affixed to TV6 Margin= no direct-line contour overlap.
"*" Applicant's license and initial application

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 predicted from the F(50-50) table except when 10 miles or greater the contours are predicted from the Commission's F(50-10) table. Contour distances are in kilometers and are calculated using the Commission's TVFMINT FORTRAN subroutine (converted to C). 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. For these allocation studies the N.G.D.C. 30 arc-second terrain elevation database was 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 contour overlap. 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 contour overlap.

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

The columns labeled "INT" and "PRO" contain 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 with an omni-directional antenna. 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”.

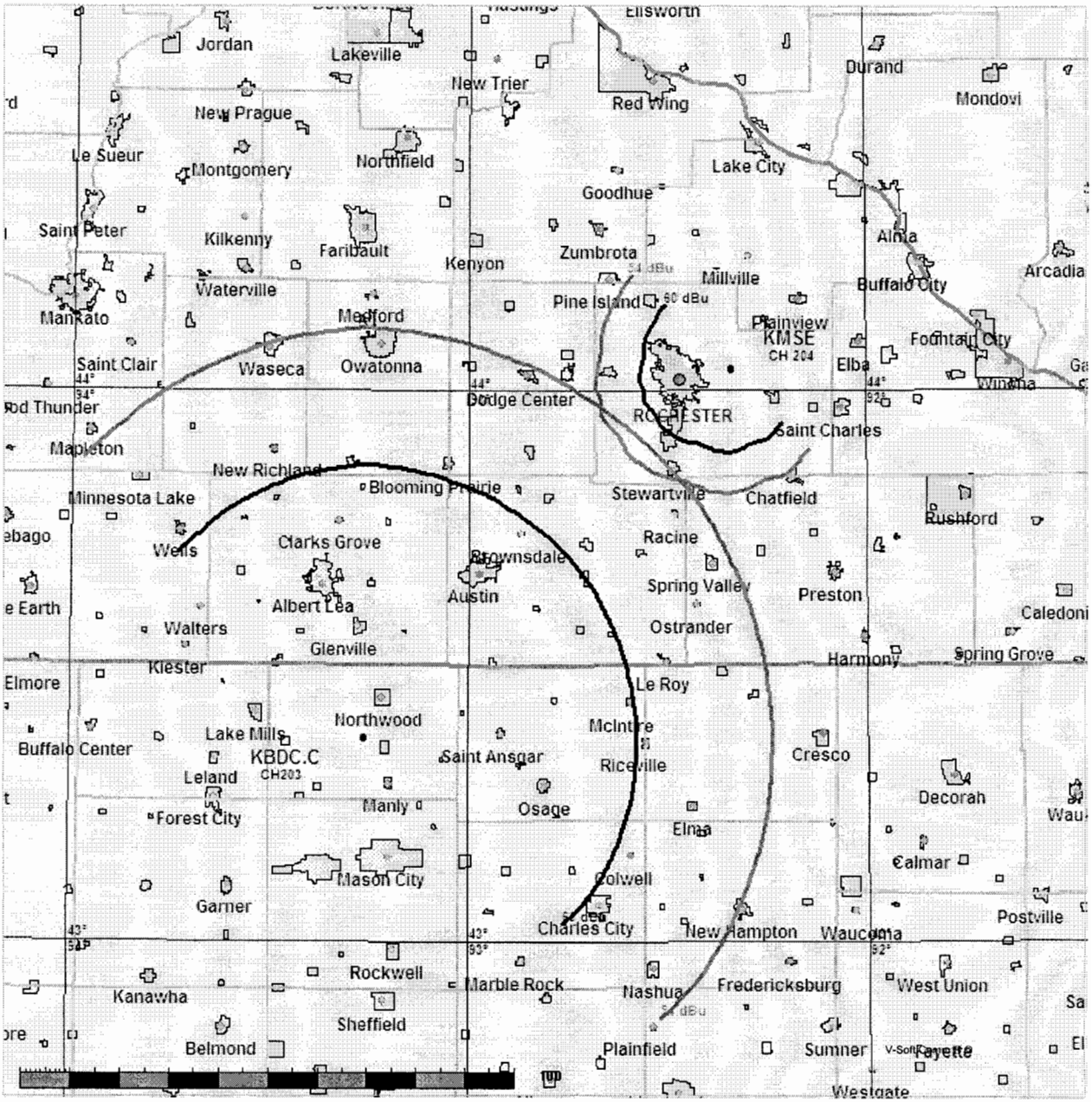
KMSE Allocation Study KMSE vs KBDC(CP)
Minnesota Public Radio

FMCommander Allocation Study
01-26-2006

KMSE CH 204 A
.25 kW 522 M COR
Prot. = 60 dBu
Intef. = 54 dBu

KBDC.C CH 203 C1 BPED19981230ME
66 kW, 522 M COR
Prot. = 60 dBu
Intef. = 54 dBu

Scale = 1:2,000,000



01-26-2006 30 Arc-Sec. Terrain Data FMOver Analysis

KMSE
Channel = 204A
Max ERP = 0.25 kW
RCAMSL = 522 M
N. Lat = 44 02 28
W. Lng = 92 20 25
Protected
60 dBu

KBDC.C BPED19981230ME
Channel = 203C1
Max ERP = 66 kW
RCAMSL = 522 M
N. Lat = 43 22 21
W. Lng = 93 15 57
Interfering
54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
165.0	000.2500	0147.6	015.7	052.7	066.0000	0154.7	098.5	49.45
166.0	000.2500	0148.4	015.8	052.7	066.0000	0154.7	098.2	49.52
167.0	000.2500	0149.5	015.9	052.6	066.0000	0154.7	097.9	49.60
168.0	000.2500	0151.3	016.0	052.6	066.0000	0154.7	097.6	49.68
169.0	000.2500	0153.2	016.1	052.6	066.0000	0154.7	097.3	49.76
170.0	000.2500	0155.2	016.2	052.6	066.0000	0154.7	097.0	49.85
171.0	000.2500	0156.5	016.3	052.6	066.0000	0154.7	096.7	49.93
172.0	000.2500	0157.5	016.4	052.5	066.0000	0154.7	096.4	50.00
173.0	000.2500	0158.9	016.5	052.5	066.0000	0154.7	096.1	50.08
174.0	000.2500	0160.1	016.5	052.5	066.0000	0154.5	095.8	50.15
175.0	000.2500	0161.1	016.6	052.4	066.0000	0154.5	095.6	50.23
176.0	000.2500	0161.7	016.6	052.3	066.0000	0154.5	095.3	50.30
177.0	000.2500	0162.5	016.7	052.3	066.0000	0154.5	095.0	50.38
178.0	000.2500	0163.4	016.7	052.2	066.0000	0154.5	094.8	50.45
179.0	000.2500	0164.8	016.8	052.1	066.0000	0154.5	094.5	50.53
180.0	000.2500	0166.2	016.9	052.1	066.0000	0154.5	094.2	50.61
181.0	000.2500	0166.8	016.9	052.0	066.0000	0154.5	093.9	50.68
182.0	000.2500	0166.4	016.9	051.8	066.0000	0154.5	093.7	50.74
183.0	000.2500	0165.7	016.9	051.7	066.0000	0154.5	093.5	50.80
184.0	000.2500	0165.1	016.8	051.6	066.0000	0154.5	093.3	50.86
185.0	000.2500	0164.1	016.8	051.4	066.0000	0154.2	093.2	50.90
186.0	000.2500	0164.0	016.8	051.3	066.0000	0154.2	092.9	50.96
187.0	000.2500	0165.5	016.9	051.2	066.0000	0154.2	092.7	51.03
188.0	000.2500	0166.6	016.9	051.1	066.0000	0154.2	092.4	51.10
189.0	000.2500	0167.4	017.0	051.0	066.0000	0154.2	092.2	51.17
190.0	000.2500	0167.1	017.0	050.8	066.0000	0154.2	092.0	51.22
191.0	000.2500	0165.8	016.9	050.7	066.0000	0154.2	091.9	51.26
192.0	000.2500	0163.5	016.7	050.5	066.0000	0153.9	091.8	51.27
193.0	000.2500	0161.1	016.6	050.3	066.0000	0153.9	091.7	51.29
194.0	000.2500	0160.1	016.5	050.1	066.0000	0153.9	091.6	51.33
195.0	000.2500	0159.9	016.5	050.0	066.0000	0153.9	091.4	51.38
196.0	000.2500	0159.7	016.5	049.8	066.0000	0153.9	091.3	51.42
197.0	000.2500	0159.4	016.5	049.7	066.0000	0153.9	091.1	51.46
198.0	000.2500	0158.9	016.5	049.5	066.0000	0153.5	091.0	51.49
199.0	000.2500	0158.5	016.4	049.3	066.0000	0153.5	090.9	51.52
200.0	000.2500	0158.2	016.4	049.2	066.0000	0153.5	090.7	51.56
201.0	000.2500	0158.2	016.4	049.0	066.0000	0153.5	090.6	51.60

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
202.0	000.2500	0158.4	016.4	048.9	066.0000	0153.5	090.5	51.64
203.0	000.2500	0158.7	016.5	048.7	066.0000	0153.5	090.3	51.68
204.0	000.2500	0159.2	016.5	048.5	066.0000	0153.5	090.2	51.73
205.0	000.2500	0160.4	016.6	048.4	066.0000	0153.2	090.0	51.77
206.0	000.2500	0162.5	016.7	048.3	066.0000	0153.2	089.7	51.84
207.0	000.2500	0164.9	016.8	048.1	066.0000	0153.2	089.5	51.91
208.0	000.2500	0166.9	016.9	048.0	066.0000	0153.2	089.3	51.97
209.0	000.2500	0168.4	017.0	047.8	066.0000	0153.2	089.1	52.02
210.0	000.2500	0169.7	017.1	047.6	066.0000	0153.2	088.9	52.07
211.0	000.2500	0170.8	017.2	047.5	066.0000	0153.0	088.8	52.11
212.0	000.2500	0172.0	017.2	047.3	066.0000	0153.0	088.7	52.15
213.0	000.2500	0173.3	017.3	047.1	066.0000	0153.0	088.5	52.19
214.0	000.2500	0174.8	017.4	047.0	066.0000	0153.0	088.4	52.24
215.0	000.2500	0176.6	017.5	046.8	066.0000	0153.0	088.2	52.28
216.0	000.2500	0178.2	017.5	046.6	066.0000	0153.0	088.1	52.32
217.0	000.2500	0179.5	017.6	046.4	066.0000	0152.8	087.9	52.35
218.0	000.2500	0180.3	017.6	046.2	066.0000	0152.8	087.9	52.37
219.0	000.2500	0180.7	017.7	046.0	066.0000	0152.8	087.8	52.39
220.0	000.2500	0181.2	017.7	045.8	066.0000	0152.8	087.7	52.41
221.0	000.2500	0182.1	017.7	045.6	066.0000	0152.8	087.7	52.43
222.0	000.2500	0183.1	017.8	045.4	066.0000	0152.5	087.6	52.44
223.0	000.2500	0183.8	017.8	045.2	066.0000	0152.5	087.5	52.46
224.0	000.2500	0184.3	017.8	045.0	066.0000	0152.5	087.5	52.47
225.0	000.2500	0185.6	017.9	044.8	066.0000	0152.5	087.4	52.48
226.0	000.2500	0187.7	018.0	044.6	066.0000	0152.5	087.4	52.51
227.0	000.2500	0189.6	018.1	044.4	066.0000	0152.2	087.3	52.52
228.0	000.2500	0190.9	018.1	044.2	066.0000	0152.2	087.2	52.54
229.0	000.2500	0191.4	018.1	044.0	066.0000	0152.2	087.2	52.54
230.0	000.2500	0191.2	018.1	043.8	066.0000	0152.2	087.3	52.53
231.0	000.2500	0190.2	018.1	043.6	066.0000	0152.2	087.3	52.50
232.0	000.2500	0188.8	018.0	043.4	066.0000	0152.0	087.5	52.46
233.0	000.2500	0187.5	018.0	043.2	066.0000	0152.0	087.6	52.43
234.0	000.2500	0186.5	017.9	043.0	066.0000	0152.0	087.7	52.40
235.0	000.2500	0185.7	017.9	042.8	066.0000	0152.0	087.8	52.37
236.0	000.2500	0184.9	017.9	042.6	066.0000	0152.0	087.9	52.34
237.0	000.2500	0184.1	017.8	042.4	066.0000	0151.8	088.0	52.31
238.0	000.2500	0183.8	017.8	042.2	066.0000	0151.8	088.1	52.28
239.0	000.2500	0184.1	017.8	042.0	066.0000	0151.8	088.1	52.26
240.0	000.2500	0185.1	017.9	041.8	066.0000	0151.8	088.2	52.24
241.0	000.2500	0186.5	017.9	041.6	066.0000	0151.8	088.2	52.23
242.0	000.2500	0188.2	018.0	041.4	066.0000	0151.7	088.2	52.22
243.0	000.2500	0190.0	018.1	041.2	066.0000	0151.7	088.3	52.21
244.0	000.2500	0192.0	018.2	041.0	066.0000	0151.7	088.3	52.20
245.0	000.2500	0194.0	018.3	040.8	066.0000	0151.7	088.4	52.18
246.0	000.2500	0195.8	018.3	040.6	066.0000	0151.7	088.4	52.17
247.0	000.2500	0198.0	018.4	040.3	066.0000	0151.4	088.5	52.14
248.0	000.2500	0200.0	018.5	040.1	066.0000	0151.4	088.5	52.12
249.0	000.2500	0201.6	018.6	039.9	066.0000	0151.4	088.6	52.10
250.0	000.2500	0202.1	018.6	039.7	066.0000	0151.4	088.8	52.06
251.0	000.2500	0201.2	018.6	039.6	066.0000	0151.4	089.0	52.00
252.0	000.2500	0199.3	018.5	039.4	066.0000	0151.2	089.2	51.92

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
253.0	000.2500	0196.6	018.4	039.3	066.0000	0151.2	089.5	51.84
254.0	000.2500	0193.7	018.2	039.2	066.0000	0151.2	089.8	51.75
255.0	000.2500	0191.6	018.2	039.0	066.0000	0151.2	090.0	51.68
256.0	000.2500	0190.3	018.1	038.9	066.0000	0151.2	090.2	51.61
257.0	000.2500	0191.0	018.1	038.7	066.0000	0151.2	090.4	51.56
258.0	000.2500	0193.2	018.2	038.5	066.0000	0151.2	090.5	51.53
259.0	000.2500	0195.8	018.3	038.3	066.0000	0150.9	090.6	51.48
260.0	000.2500	0198.5	018.5	038.1	066.0000	0150.9	090.8	51.45
261.0	000.2500	0199.7	018.5	037.9	066.0000	0150.9	090.9	51.40
262.0	000.2500	0199.8	018.5	037.8	066.0000	0150.9	091.2	51.34
263.0	000.2500	0198.9	018.5	037.7	066.0000	0150.9	091.4	51.26
264.0	000.2500	0198.0	018.4	037.5	066.0000	0150.9	091.7	51.19
265.0	000.2500	0196.9	018.4	037.4	066.0000	0150.6	091.9	51.10
266.0	000.2500	0195.3	018.3	037.3	066.0000	0150.6	092.2	51.02
267.0	000.2500	0193.3	018.2	037.2	066.0000	0150.6	092.5	50.94
268.0	000.2500	0191.7	018.2	037.1	066.0000	0150.6	092.8	50.85
269.0	000.2500	0190.1	018.1	037.0	066.0000	0150.6	093.1	50.77
270.0	000.2500	0188.5	018.0	037.0	066.0000	0150.6	093.4	50.69
271.0	000.2500	0187.0	017.9	036.9	066.0000	0150.6	093.7	50.61
272.0	000.2500	0185.6	017.9	036.8	066.0000	0150.6	094.0	50.53
273.0	000.2500	0184.1	017.8	036.7	066.0000	0150.6	094.3	50.44
274.0	000.2500	0182.8	017.8	036.6	066.0000	0150.6	094.5	50.36
275.0	000.2500	0182.0	017.7	036.6	066.0000	0150.6	094.8	50.28
276.0	000.2500	0181.3	017.7	036.5	066.0000	0150.3	095.1	50.20
277.0	000.2500	0181.0	017.7	036.4	066.0000	0150.3	095.4	50.12
278.0	000.2500	0180.8	017.7	036.3	066.0000	0150.3	095.7	50.04
279.0	000.2500	0181.3	017.7	036.2	066.0000	0150.3	095.9	49.97
280.0	000.2500	0182.4	017.7	036.1	066.0000	0150.3	096.2	49.90
281.0	000.2500	0183.6	017.8	036.0	066.0000	0150.3	096.4	49.83
282.0	000.2500	0185.3	017.9	035.9	066.0000	0150.3	096.7	49.77
283.0	000.2500	0186.8	017.9	035.8	066.0000	0150.3	096.9	49.70
284.0	000.2500	0188.4	018.0	035.6	066.0000	0150.3	097.2	49.63
285.0	000.2500	0189.8	018.1	035.5	066.0000	0150.3	097.5	49.55

01-26-2006 30 Arc-Sec. Sec. Terrain Data

KBDC.C BPED19981230ME
Channel = 203C1
Max ERP = 66 kW
RCAMSL = 522 M
N. Lat = 43 22 21
W. Lng = 93 15 57
Protected
   60 dBu

KMSE
Channel = 204A
Max ERP = 0.25 kW
RCAMSL = 522 M
N. Lat = 44 02 28
W. Lng = 92 20 25
Interfering
   54 dBu

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
345.0	066.0000	0145.5	054.1	256.3	000.2500	0190.3	091.0	28.70
346.0	066.0000	0146.2	054.2	256.4	000.2500	0190.3	090.1	28.97
347.0	066.0000	0146.7	054.3	256.4	000.2500	0190.3	089.1	29.26
348.0	066.0000	0147.0	054.3	256.4	000.2500	0190.3	088.2	29.55
349.0	066.0000	0147.1	054.3	256.4	000.2500	0190.3	087.2	29.85
350.0	066.0000	0147.3	054.3	256.4	000.2500	0190.3	086.3	30.14
351.0	066.0000	0147.6	054.4	256.3	000.2500	0190.3	085.3	30.44
352.0	066.0000	0147.6	054.4	256.3	000.2500	0190.3	084.4	30.74
353.0	066.0000	0147.8	054.4	256.2	000.2500	0190.3	083.4	31.04
354.0	066.0000	0148.0	054.4	256.1	000.2500	0190.3	082.5	31.34
355.0	066.0000	0148.3	054.5	256.1	000.2500	0190.3	081.5	31.64
356.0	066.0000	0148.9	054.5	256.0	000.2500	0190.3	080.6	31.94
357.0	066.0000	0149.4	054.6	255.9	000.2500	0190.3	079.6	32.25
358.0	066.0000	0150.4	054.7	255.9	000.2500	0190.3	078.7	32.55
359.0	066.0000	0151.3	054.9	255.8	000.2500	0190.3	077.7	32.86
000.0	066.0000	0152.0	054.9	255.7	000.2500	0190.3	076.8	33.17
001.0	066.0000	0152.0	054.9	255.5	000.2500	0191.6	075.8	33.53
002.0	066.0000	0151.9	054.9	255.3	000.2500	0191.6	074.9	33.83
003.0	066.0000	0151.8	054.9	255.0	000.2500	0191.6	074.0	34.13
004.0	066.0000	0151.0	054.8	254.7	000.2500	0191.6	073.1	34.41
005.0	066.0000	0150.5	054.8	254.4	000.2500	0193.7	072.3	34.78
006.0	066.0000	0150.3	054.7	254.1	000.2500	0193.7	071.4	35.08
007.0	066.0000	0150.3	054.7	253.8	000.2500	0193.7	070.5	35.37
008.0	066.0000	0150.3	054.7	253.5	000.2500	0196.6	069.6	35.78
009.0	066.0000	0150.3	054.7	253.1	000.2500	0196.6	068.8	36.07
010.0	066.0000	0150.3	054.7	252.8	000.2500	0196.6	067.9	36.35
011.0	066.0000	0150.2	054.7	252.4	000.2500	0199.3	067.1	36.74
012.0	066.0000	0149.9	054.7	251.9	000.2500	0199.3	066.3	37.02
013.0	066.0000	0149.7	054.6	251.5	000.2500	0201.2	065.5	37.36
014.0	066.0000	0149.6	054.6	251.0	000.2500	0201.2	064.7	37.64
015.0	066.0000	0149.6	054.6	250.5	000.2500	0201.2	063.9	37.91
016.0	066.0000	0149.6	054.6	250.0	000.2500	0202.1	063.1	38.22
017.0	066.0000	0149.4	054.6	249.5	000.2500	0201.6	062.4	38.46
018.0	066.0000	0149.1	054.6	248.9	000.2500	0201.6	061.7	38.71

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
019.0	066.0000	0148.6	054.5	248.3	000.2500	0200.0	061.0	38.89
020.0	066.0000	0148.2	054.5	247.6	000.2500	0200.0	060.3	39.14
021.0	066.0000	0148.2	054.4	247.0	000.2500	0198.0	059.6	39.31
022.0	066.0000	0148.5	054.5	246.4	000.2500	0195.8	058.9	39.48
023.0	066.0000	0149.0	054.6	245.7	000.2500	0195.8	058.2	39.74
024.0	066.0000	0149.6	054.6	245.1	000.2500	0194.0	057.5	39.92
025.0	066.0000	0150.1	054.7	244.4	000.2500	0192.0	056.9	40.09
026.0	066.0000	0150.3	054.7	243.6	000.2500	0192.0	056.2	40.32
027.0	066.0000	0150.4	054.7	242.8	000.2500	0190.0	055.7	40.45
028.0	066.0000	0150.4	054.7	242.0	000.2500	0188.2	055.1	40.58
029.0	066.0000	0150.5	054.7	241.2	000.2500	0186.5	054.6	40.70
030.0	066.0000	0150.4	054.7	240.3	000.2500	0185.1	054.1	40.83
031.0	066.0000	0150.2	054.7	239.4	000.2500	0184.1	053.7	40.95
032.0	066.0000	0149.9	054.7	238.5	000.2500	0183.8	053.3	41.09
033.0	066.0000	0149.7	054.7	237.6	000.2500	0183.8	052.9	41.24
034.0	066.0000	0149.8	054.7	236.6	000.2500	0184.1	052.5	41.40
035.0	066.0000	0150.1	054.7	235.6	000.2500	0184.9	052.1	41.58
036.0	066.0000	0150.3	054.7	234.7	000.2500	0185.7	051.8	41.75
037.0	066.0000	0150.6	054.8	233.7	000.2500	0186.5	051.4	41.92
038.0	066.0000	0150.9	054.8	232.6	000.2500	0187.5	051.2	42.08
039.0	066.0000	0151.2	054.8	231.6	000.2500	0188.8	050.9	42.24
040.0	066.0000	0151.4	054.9	230.5	000.2500	0190.2	050.7	42.39
041.0	066.0000	0151.7	054.9	229.5	000.2500	0191.4	050.5	42.52
042.0	066.0000	0151.8	054.9	228.4	000.2500	0190.9	050.4	42.55
043.0	066.0000	0152.0	054.9	227.3	000.2500	0189.6	050.2	42.53
044.0	066.0000	0152.2	055.0	226.2	000.2500	0187.7	050.2	42.47
045.0	066.0000	0152.5	055.0	225.1	000.2500	0185.6	050.1	42.39
046.0	066.0000	0152.8	055.0	224.0	000.2500	0184.3	050.1	42.34
047.0	066.0000	0153.0	055.1	222.9	000.2500	0183.8	050.1	42.31
048.0	066.0000	0153.2	055.1	221.8	000.2500	0183.1	050.2	42.25
049.0	066.0000	0153.5	055.1	220.7	000.2500	0182.1	050.3	42.17
050.0	066.0000	0153.9	055.2	219.7	000.2500	0181.2	050.4	42.09
051.0	066.0000	0154.2	055.2	218.6	000.2500	0180.7	050.5	42.01
052.0	066.0000	0154.5	055.3	217.5	000.2500	0180.3	050.7	41.91
053.0	066.0000	0154.7	055.3	216.4	000.2500	0178.2	051.0	41.73
054.0	066.0000	0154.9	055.3	215.4	000.2500	0176.6	051.2	41.55
055.0	066.0000	0155.0	055.3	214.4	000.2500	0174.8	051.5	41.34
056.0	066.0000	0155.0	055.3	213.4	000.2500	0173.3	051.9	41.13
057.0	066.0000	0154.9	055.3	212.4	000.2500	0172.0	052.3	40.91
058.0	066.0000	0154.8	055.3	211.5	000.2500	0170.8	052.7	40.69
059.0	066.0000	0154.6	055.3	210.6	000.2500	0170.8	053.2	40.51
060.0	066.0000	0154.4	055.3	209.7	000.2500	0169.7	053.7	40.27
061.0	066.0000	0154.3	055.2	208.8	000.2500	0168.4	054.2	40.01
062.0	066.0000	0154.2	055.2	208.0	000.2500	0166.9	054.8	39.73
063.0	066.0000	0154.2	055.2	207.2	000.2500	0164.9	055.3	39.41
064.0	066.0000	0154.1	055.2	206.4	000.2500	0162.5	055.9	39.07
065.0	066.0000	0154.0	055.2	205.6	000.2500	0162.5	056.5	38.84
066.0	066.0000	0154.0	055.2	204.9	000.2500	0160.4	057.1	38.50
067.0	066.0000	0154.2	055.2	204.2	000.2500	0159.2	057.8	38.21
068.0	066.0000	0154.5	055.3	203.5	000.2500	0158.7	058.4	37.95
069.0	066.0000	0154.7	055.3	202.8	000.2500	0158.7	059.1	37.70

Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Azimuth (degrees)	ERP (kW)	HAAT (m)	Dist (km)	Actual (dBu)
070.0	066.0000	0154.7	055.3	202.2	000.2500	0158.4	059.8	37.43
071.0	066.0000	0154.6	055.3	201.6	000.2500	0158.4	060.5	37.16
072.0	066.0000	0154.6	055.3	201.0	000.2500	0158.2	061.3	36.89
073.0	066.0000	0154.6	055.3	200.5	000.2500	0158.2	062.0	36.62
074.0	066.0000	0154.7	055.3	199.9	000.2500	0158.2	062.8	36.35
075.0	066.0000	0154.8	055.3	199.4	000.2500	0158.5	063.6	36.10
076.0	066.0000	0155.0	055.3	198.9	000.2500	0158.5	064.4	35.84
077.0	066.0000	0155.1	055.3	198.5	000.2500	0158.9	065.2	35.58
078.0	066.0000	0155.2	055.4	198.0	000.2500	0158.9	066.0	35.31
079.0	066.0000	0155.3	055.4	197.6	000.2500	0158.9	066.8	35.03
080.0	066.0000	0155.5	055.4	197.2	000.2500	0159.4	067.7	34.78
081.0	066.0000	0155.6	055.4	196.8	000.2500	0159.4	068.5	34.49
082.0	066.0000	0155.8	055.4	196.5	000.2500	0159.7	069.4	34.23
083.0	066.0000	0155.9	055.4	196.2	000.2500	0159.7	070.3	33.94
084.0	066.0000	0156.1	055.5	195.8	000.2500	0159.7	071.2	33.65
085.0	066.0000	0156.4	055.5	195.5	000.2500	0159.7	072.1	33.36
086.0	066.0000	0156.5	055.5	195.3	000.2500	0159.9	073.0	33.07
087.0	066.0000	0156.6	055.5	195.0	000.2500	0159.9	073.9	32.78
088.0	066.0000	0156.7	055.5	194.8	000.2500	0159.9	074.8	32.48
089.0	066.0000	0156.7	055.5	194.6	000.2500	0159.9	075.8	32.18
090.0	066.0000	0156.7	055.5	194.4	000.2500	0160.1	076.7	31.90
091.0	066.0000	0156.7	055.5	194.3	000.2500	0160.1	077.6	31.60
092.0	066.0000	0156.7	055.5	194.1	000.2500	0160.1	078.6	31.30
093.0	066.0000	0156.7	055.6	194.0	000.2500	0160.1	079.5	31.01
094.0	066.0000	0157.0	055.6	193.8	000.2500	0160.1	080.5	30.71
095.0	066.0000	0157.3	055.6	193.7	000.2500	0160.1	081.4	30.42
096.0	066.0000	0157.6	055.7	193.6	000.2500	0160.1	082.4	30.12
097.0	066.0000	0158.0	055.7	193.5	000.2500	0161.1	083.4	29.87
098.0	066.0000	0158.3	055.7	193.4	000.2500	0161.1	084.3	29.57
099.0	066.0000	0158.8	055.8	193.3	000.2500	0161.1	085.3	29.28
100.0	066.0000	0159.4	055.9	193.2	000.2500	0161.1	086.3	28.98
101.0	066.0000	0159.8	055.9	193.1	000.2500	0161.1	087.2	28.69
102.0	066.0000	0160.3	056.0	193.1	000.2500	0161.1	088.2	28.40
103.0	066.0000	0160.5	056.0	193.1	000.2500	0161.1	089.2	28.11
104.0	066.0000	0160.7	056.0	193.1	000.2500	0161.1	090.2	27.82
105.0	066.0000	0160.7	056.0	193.1	000.2500	0161.1	091.1	27.53

Channel-Six - Exhibit #18

January 25, 2005

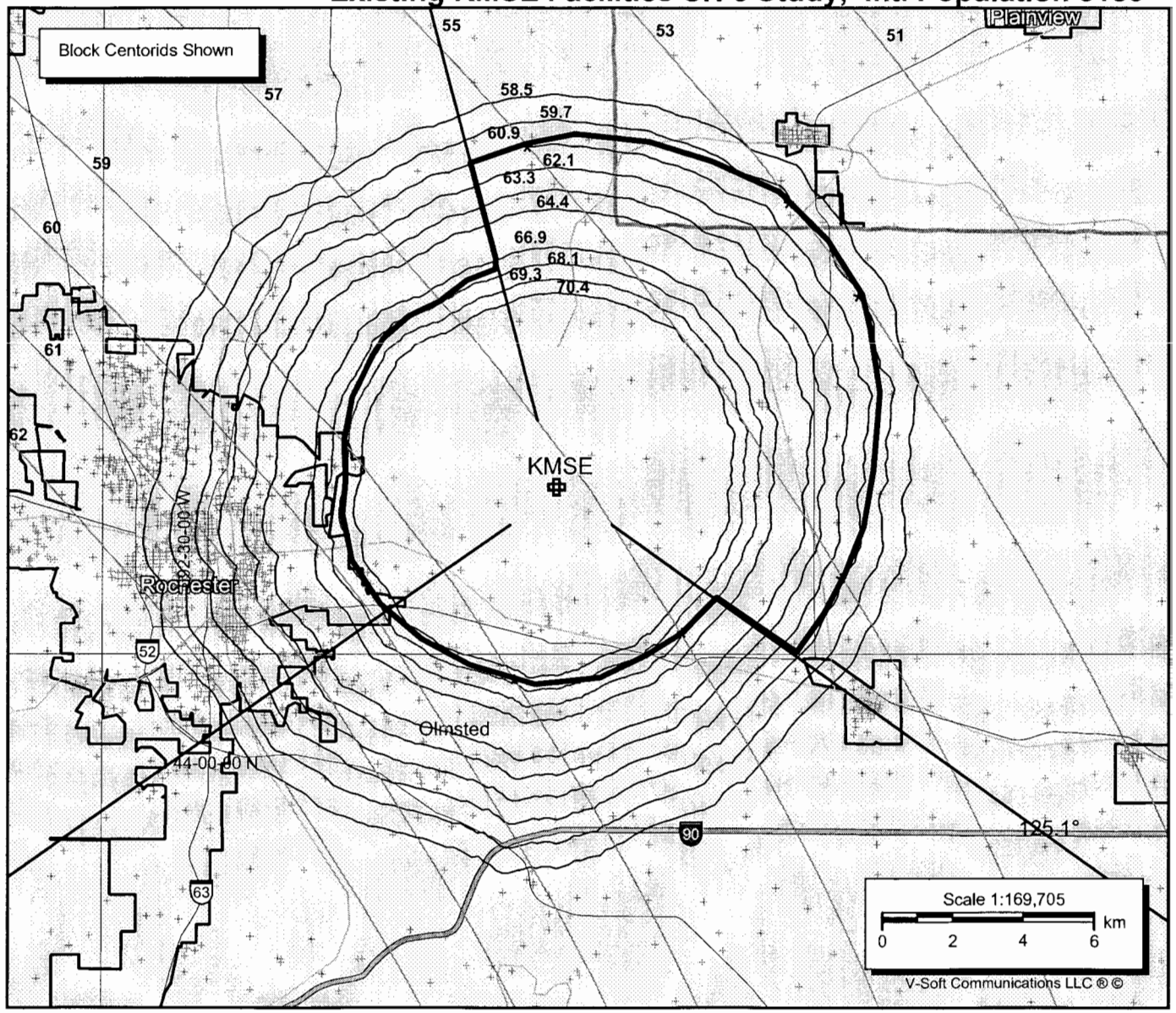
The first map in this exhibit calculates the existing KMSE population within the area of interference predicted to be caused KAAL-TV6 in Austin, Minnesota. This amounts to 3,180 people. The second map in this exhibit shows the interference area calculated at the new antenna height and power at the newly proposed tower site location. This map study shows that 3,133 people are predicted to be caused interference. Both studies used a study ERP of ERP(H) + ERP(V)/10 which is consistent with the use of mixed polarization and is defined in Section 73.525 of the Commission's rules.

Our calculations show that no new people now fall within the newly calculated interference area, 47 people now fall outside the new interference area; therefore, for every new person that was added to the new interference area, more than 2 people were removed from the interference area. The map shows the existing interference area contained by a red line while the newly calculated interference is delineated by a black line. The U.S. 2000 census was used for both studies and the population centroids are shown on the maps. There are no other channel-six TV stations within the, Section 73.525, 235 kilometer cutoff distance for FM channel 204. The U.S.G.S. National Elevation Datum, 3 arc-second, terrain elevation database was used to determine the distance to the appropriate TV protected signal contours and the FM interference signal contours.

Page #4 of this exhibit is a distance to contour table for KAAL-TV, channel-six, showing the pertinent protected signal contours used in this study. Page #5 is a distance to contour table of the FM station's interference contours used in the study. Page #6 is a printout of the operating parameters of KAAL-TV6 and the U/D ratios used in the studies.

Existing KMSE Facilities CH 6 Study, Int. Population 3180

KMSE
BLED19980729KB
Latitude: 44-02-32 N
Longitude: 092-20-26 W
ERP: 0.031 kW
Channel: 204
Frequency: 88.7 MHz
AMSL Height: 518.0 m
Elevation: 382.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: FCC



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CH 6 -TV Interference Comparison

KMSE(New)

Latitude: 44-02-28 N
Longitude: 092-20-25 W
ERP: 0.031 kW
Channel: 204
Frequency: 88.7 MHz
AMSL Height: 522.0 m
Elevation: 379.8 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None
Int. Population 3133
Int. Gained = 0
Int. Lost = 47

January 25, 2006

KMSE (Existing)

BLED19980729KB
Latitude: 44-02-32 N
Longitude: 092-20-26 W
ERP: 0.31 kW
Channel: 204
Frequency: 88.7 MHz
AMSL Height: 518.0 m
Elevation: 382.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Int. Population = 3180

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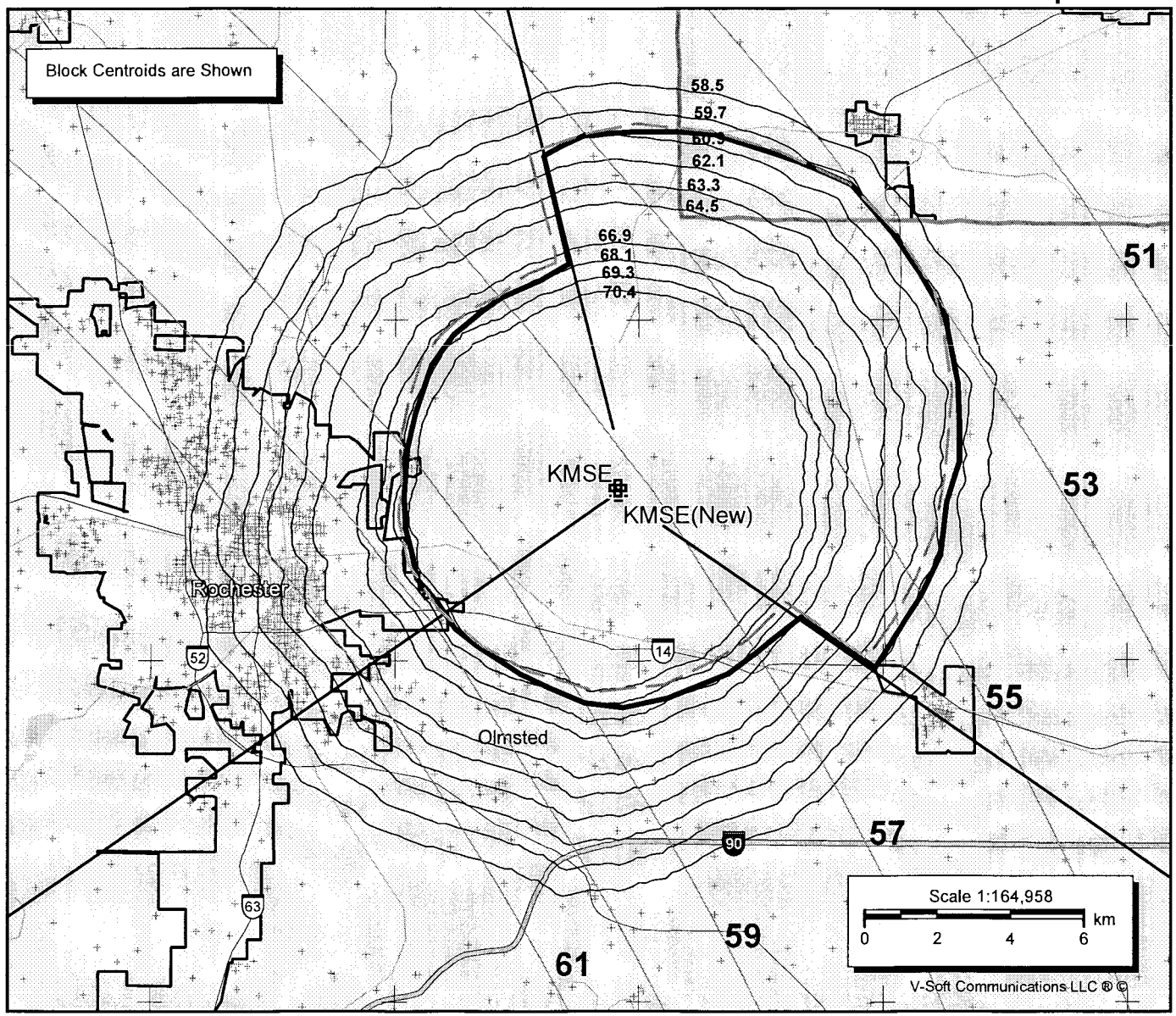
Cedar Falls, Iowa 50613
Telecommunications Consultants



N. Lat. = 43 37 42 W. Lng. = 93 09 12

HAAT and Distance to Contour - FCC Method - NED 03 Arc Sec.

KAAL , Kaal-tv, Lic , BLCT2236 - Protected Contours (F5 = 50-50)

Azi.	AV EL	HAAT	ERP kW	dBk	Field	51-F5	53-F5	55-F5	57-F5	59-F5	61-F5
000	374.5	321.5	100.0000	20.00	1.000	95.13	90.39	85.68	80.99	76.32	71.65
010	378.7	317.3	100.0000	20.00	1.000	94.84	90.10	85.38	80.69	76.01	71.35
020	383.3	312.7	100.0000	20.00	1.000	94.52	89.77	85.04	80.35	75.67	71.00
030	384.6	311.4	100.0000	20.00	1.000	94.43	89.68	84.95	80.25	75.57	70.91
040	383.6	312.4	100.0000	20.00	1.000	94.50	89.75	85.02	80.32	75.64	70.98
050	382.2	313.8	100.0000	20.00	1.000	94.60	89.85	85.13	80.43	75.75	71.09
060	378.1	317.9	100.0000	20.00	1.000	94.89	90.15	85.43	80.73	76.06	71.39
070	374.8	321.2	100.0000	20.00	1.000	95.11	90.37	85.66	80.97	76.30	71.63
080	372.1	323.9	100.0000	20.00	1.000	95.28	90.56	85.85	81.17	76.50	71.83
090	370.6	325.4	100.0000	20.00	1.000	95.38	90.66	85.96	81.28	76.61	71.94
100	369.6	326.4	100.0000	20.00	1.000	95.45	90.72	86.03	81.35	76.68	72.01
110	367.1	328.9	100.0000	20.00	1.000	95.61	90.89	86.21	81.54	76.87	72.20
120	367.6	328.4	100.0000	20.00	1.000	95.57	90.86	86.17	81.50	76.83	72.16
130	366.3	329.7	100.0000	20.00	1.000	95.66	90.95	86.27	81.60	76.93	72.26
140	367.5	328.5	100.0000	20.00	1.000	95.59	90.87	86.18	81.51	76.84	72.17
150	370.7	325.3	100.0000	20.00	1.000	95.38	90.65	85.96	81.28	76.60	71.94
160	374.9	321.1	100.0000	20.00	1.000	95.10	90.36	85.65	80.96	76.29	71.62
170	375.7	320.3	100.0000	20.00	1.000	95.05	90.31	85.60	80.91	76.23	71.57
180	376.8	319.2	100.0000	20.00	1.000	94.98	90.23	85.52	80.83	76.15	71.49
190	379.8	316.2	100.0000	20.00	1.000	94.77	90.02	85.30	80.61	75.93	71.27
200	384.9	311.1	100.0000	20.00	1.000	94.41	89.66	84.93	80.23	75.55	70.89
210	385.4	310.6	100.0000	20.00	1.000	94.37	89.62	84.89	80.19	75.52	70.85
220	381.0	315.0	100.0000	20.00	1.000	94.69	89.94	85.22	80.52	75.84	71.18
230	378.9	317.1	100.0000	20.00	1.000	94.83	90.09	85.37	80.68	76.00	71.33
240	378.5	317.5	100.0000	20.00	1.000	94.86	90.12	85.40	80.70	76.03	71.36
250	378.9	317.1	100.0000	20.00	1.000	94.83	90.09	85.37	80.67	76.00	71.33
260	379.1	316.9	100.0000	20.00	1.000	94.82	90.07	85.35	80.66	75.98	71.32
270	376.6	319.4	100.0000	20.00	1.000	94.99	90.25	85.53	80.84	76.16	71.50
280	379.4	316.6	100.0000	20.00	1.000	94.79	90.05	85.33	80.63	75.95	71.29
290	384.0	312.0	100.0000	20.00	1.000	94.47	89.72	85.00	80.30	75.62	70.96
300	384.5	311.5	100.0000	20.00	1.000	94.43	89.68	84.95	80.26	75.58	70.91
310	385.0	311.0	100.0000	20.00	1.000	94.40	89.65	84.92	80.22	75.54	70.88
320	380.7	315.3	100.0000	20.00	1.000	94.70	89.96	85.24	80.54	75.86	71.20
330	375.6	320.4	100.0000	20.00	1.000	95.06	90.32	85.61	80.92	76.24	71.58
340	372.2	323.8	100.0000	20.00	1.000	95.28	90.55	85.85	81.16	76.49	71.82
350	372.2	323.8	100.0000	20.00	1.000	95.28	90.55	85.85	81.16	76.49	71.82

Ave El= 377.10 M HAAT= 318.90 M AMSL= 696 M

Doug Vernier, Telecommunications Consultants
N. Lat. = 44 02 28 W. Lng. = 92 20 25
HAAT and Distance to Contour - FCC Method - 03 Arc Sec.

Minnesota Public Radio

Azi.	AV EL	HAAT	ERP kW	dBk	Field	59.7-F1	62.1-F1	64.5-F1	66.9-F1	68.1-F1	69.3-F1	70.4-F1
000	349.4	172.6	0.0310	-15.09	1.000	10.39	9.05	7.82	6.79	6.32	5.88	5.49
010	351.6	170.4	0.0310	-15.09	1.000	10.32	8.98	7.77	6.74	6.28	5.84	5.46
020	348.7	173.3	0.0310	-15.09	1.000	10.41	9.06	7.84	6.80	6.33	5.89	5.50
030	350.8	171.2	0.0310	-15.09	1.000	10.34	9.01	7.79	6.76	6.30	5.86	5.47
040	348.0	174.0	0.0310	-15.09	1.000	10.43	9.09	7.85	6.81	6.34	5.90	5.51
050	353.8	168.2	0.0310	-15.09	1.000	10.25	8.92	7.71	6.70	6.24	5.81	5.42
060	354.2	167.8	0.0310	-15.09	1.000	10.23	8.91	7.70	6.69	6.24	5.80	5.42
070	363.3	158.7	0.0310	-15.09	1.000	9.93	8.63	7.47	6.51	6.07	5.65	5.27
080	370.8	151.2	0.0310	-15.09	1.000	9.67	8.40	7.29	6.36	5.92	5.51	5.14
090	380.2	141.8	0.0310	-15.09	1.000	9.33	8.10	7.06	6.16	5.74	5.33	4.97
100	374.1	147.9	0.0310	-15.09	1.000	9.55	8.30	7.21	6.29	5.86	5.45	5.08
110	381.3	140.7	0.0310	-15.09	1.000	9.29	8.07	7.03	6.14	5.72	5.31	4.95
120	383.1	138.9	0.0310	-15.09	1.000	9.23	8.01	6.99	6.10	5.68	5.28	4.92
130	390.3	131.7	0.0310	-15.09	1.000	8.98	7.80	6.82	5.95	5.54	5.14	4.79
140	387.4	134.6	0.0310	-15.09	1.000	9.08	7.89	6.89	6.01	5.60	5.20	4.85
150	381.9	140.1	0.0310	-15.09	1.000	9.27	8.05	7.02	6.13	5.71	5.30	4.94
160	379.7	142.3	0.0310	-15.09	1.000	9.35	8.12	7.07	6.17	5.75	5.34	4.98
170	371.8	150.2	0.0310	-15.09	1.000	9.63	8.37	7.27	6.34	5.91	5.49	5.13
180	358.4	163.6	0.0310	-15.09	1.000	10.09	8.78	7.60	6.61	6.16	5.73	5.35
190	356.0	166.0	0.0310	-15.09	1.000	10.17	8.85	7.66	6.66	6.20	5.77	5.39
200	362.5	159.5	0.0310	-15.09	1.000	9.95	8.66	7.49	6.53	6.08	5.66	5.29
210	353.1	168.9	0.0310	-15.09	1.000	10.27	8.94	7.73	6.72	6.26	5.82	5.44
220	344.7	177.3	0.0310	-15.09	1.000	10.53	9.18	7.93	6.87	6.40	5.95	5.56
230	332.4	189.6	0.0310	-15.09	1.000	10.87	9.49	8.21	7.08	6.59	6.12	5.71
240	340.6	181.4	0.0310	-15.09	1.000	10.65	9.28	8.02	6.94	6.46	6.00	5.61
250	319.8	202.2	0.0310	-15.09	1.000	11.21	9.79	8.49	7.31	6.79	6.30	5.87
260	324.3	197.7	0.0310	-15.09	1.000	11.09	9.68	8.39	7.23	6.72	6.24	5.82
270	334.7	187.3	0.0310	-15.09	1.000	10.81	9.43	8.15	7.04	6.55	6.09	5.68
280	340.8	181.2	0.0310	-15.09	1.000	10.64	9.28	8.02	6.94	6.46	6.00	5.61
290	332.5	189.5	0.0310	-15.09	1.000	10.87	9.48	8.20	7.08	6.58	6.12	5.71
300	336.5	185.5	0.0310	-15.09	1.000	10.76	9.38	8.11	7.01	6.52	6.06	5.66
310	329.4	192.6	0.0310	-15.09	1.000	10.95	9.56	8.27	7.13	6.63	6.16	5.75
320	345.8	176.2	0.0310	-15.09	1.000	10.50	9.15	7.91	6.85	6.38	5.93	5.54
330	358.2	163.8	0.0310	-15.09	1.000	10.10	8.79	7.60	6.61	6.16	5.74	5.36
340	356.9	165.1	0.0310	-15.09	1.000	10.14	8.83	7.64	6.64	6.19	5.76	5.38
350	351.8	170.2	0.0310	-15.09	1.000	10.31	8.98	7.76	6.74	6.28	5.84	5.45

Ave El= 355.53 M HAAT= 166.47 M AMSL= 522

EXHIBIT # 22

R.F. RADIATION COMPLIANCE STATEMENT

Channel 204 – 0.25 kW V & 0.006 H
Rochester, Minnesota

January 2006

The proposed SWR FMEE/2 FM antenna will be energized such that it produces 0.25 kW effective radiated power in the vertical plane and 0.006 kW in the horizontal plane. The vertical antenna will be mounted on an existing tower at a height above ground of 141.7 meters and the horizontal antenna will be mounted 3 meters below it. Using the "worst-case" 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, a total, head-height, non-ionization radiation level of 0.439 microwatts per square centimeter was calculated which is 0.044 percent of the maximum for a controlled area and 0.22 percent for an uncontrolled area. There are 4 other FM stations located on the proposed tower, however, because the proposed station's calculated non-ionizing emission level is below 5%, no additional study was deemed necessary.

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

Consequently, it appears that the proposed FM station's antenna will be in full compliance with the Commission's Rules and Regulations regarding human exposure to radiofrequency electromagnetic fields.