

# 202 DATA SYSTEMS

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FCC MAIL SECTION

FEB 4 1991

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February 1, 1991

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Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

Re: Petition for Rule Making to  
Assign an FM Channel to Milford, IA

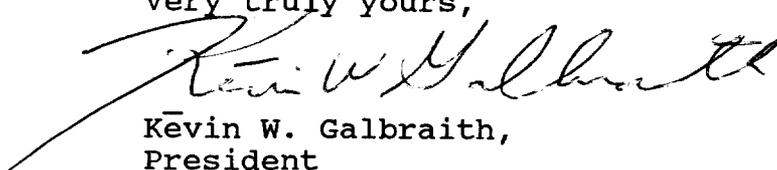
Dear Ms. Searcy:

We hereby request that the Commission assign FM Channel 271C2 to Milford, Iowa.

Enclosed are an original and four (4) copies of the engineering exhibit in support of this request.

It is our intention to apply for a construction permit to operate on the requested channel, when it is assigned.

Very truly yours,

  
Kevin W. Galbraith,  
President

Enclosure

cc: Leslie Shapiro, Room 8324  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

FCC MAIL SECTION

EVANS ASSOCIATES  
*Consulting Engineers*

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Federal Communications Commission  
Office of the Secretary

ENGINEERING REPORT

A PETITION FOR RULE MAKING  
TO AMEND THE FM TABLE OF ALLOTMENTS

TO ASSIGN FM CHANNEL 271C2  
TO MILFORD, IOWA

JANUARY 1991

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REC-11 ENGINEERING STATEMENT

This Engineering statement and attached figure have been prepared on behalf of 202 Data Systems, by B. Benjamin Evans of Evans Associates, Consulting Communications Engineers in Thiensville, Wisconsin. This exhibit supports a petition by 202 Data Systems requesting modification of the Table of FM Allotments to specify FM Channel 271C2 at Milford, Iowa.

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Evans Associates has been retained by 202 Data Systems ("petitioner") to prepare the engineering portion of a petition for rule making to assign FM Channel 271C2 to Milford, Iowa. This petition for rule making, if granted, would provide the city of Milford with its first local broadcast radio service.

The city of Milford is located in Dickinson County in northwestern Iowa. The 1980 U.S. Census population of Milford was 2,076 persons. There are no FM channels presently assigned to Milford.

As a result of a frequency search conducted by this office, it has been determined that Channel 271C2 may be assigned to Milford, Iowa as a "drop-in" without affecting any existing or proposed FM assignments. Therefore, it is requested that Section 73.202(b) of the FCC Rules and Regulations be amended in the following manner:

<u>COMMUNITY</u>	<u>EXISTING</u>	<u>PROPOSED</u>
Milford, Iowa	--	271C2

It is the petitioner's intention to apply for a construction permit to operate on the FM channel proposed herein, if it is assigned.

The reference point coordinates of the city of Milford are:

43°-19'-32"; 95°-09'-00"

The assignment of Channel 271C2 to Milford will meet all minimum distance separation requirements under the FCC Rules if the transmitter site is located at least 1.5 kilometers north of the center of Milford.

Engineering Statement - Milford, Iowa

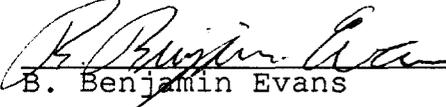
The transmitter site coordinates assumed for the purposes of this petition for rule making are:

43°-20'-20" N. Lat.; 95°-08'-59" W. Long.

From this location, it is 1.5 kilometers south to the city of Milford. Since the predicted 3.16 mv/m service contour of a maximum Class C3 facility can be expected to extend a nominal 23 kilometers, complete city grade coverage is assured. As seen in attached Figure 1, the assumed site is fully-spaced to all pertinent FM assignments.

In view of the above, it is believed that the assignment of Channel 271C2 to Milford, Iowa would be in the public interest.

The foregoing statement and the attached figure are true and accurate to the best of my knowledge and belief.

  
B. Benjamin Evans

January 30, 1991

ATTACHED FIGURE

Figure 1 - - - - Allocation Study - Channel 271C2

Evans Associates  
216 N. Green Bay Road, Thiensville WI 53092  
Phone (414) 242-6000 Fax (414) 242-6045  
FM FREQUENCY ALLOCATION STUDY

Channel: 271C2 ( 102.1 MHz)  
Coordinates: 43 - 20 - 20 95 - 8 - 59  
Job Title: TWO-O-TWO DATA - MILFORD IA

CALL STATUS	CITY STATE	CH/CL-ZN FCC#	ERP-kw COMMENTS	HAAT-m	DA	LATITUDE LONGITUDE	Cl.A Spacing: BEAR-to -from-°T	CURRENT DIST-km CLEAR-km	REQ -km
KAYLFM LIC	Storm Lake IA	268C1 BLH851205KF>	100.	64		42 37 56 95 9 54	180.0° 0.0°	78.5 +0.0	78.5
KTWB CP	Sioux Falls SD	270C2 BPH870311MK>	34.	176		43 45 11 96 53 22	288.7° 107.5°	147.9 +18.4	129.5
KEEYFM LIC	St. Paul MN	271C1 BLH4407 >	100.	110		44 57 28 93 12 23	40.1° 221.5°	237.8 +14.3	223.5
KEEYFM CP M	St. Paul MN	271C BMPH871106IS>	100.	315		45 3 30 93 7 27	39.5° 221.0°	250.4 +1.9	248.5
KOOO APP	Onawa IA	272C1 BMPH890823IC>	100.	299	Amended 900202	41 43 32 96 17 10	207.8° 27.0°	202.1 +44.6	157.5
VACA	Onawa IA 88-195	272C1 >Effective 3-6-89-Res				42 1 41 96 11 11	210.5° 29.8°	168.6 +11.1	157.5
KIOW LIC	Forest City IA	272A BLH781025AC>	3.00	91	*To channel 297C2 pe	43 17 2 93 37 50	92.3° 273.4°	123.4 +17.9	105.5

>> \*\*\* CHANNEL SUITABLE FOR ASSIGNMENT \*\*\* <<