

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re)
)
Elimination of Main Studio Rule) MB Docket No. 17-106
)

To: **Office of the Secretary**
Attn: **The Commission**

**COMMENTS IN SUPPORT OF PETITION FOR
PARTIAL RECONSIDERATION**

De La Hunt Broadcasting Corp. (“De La Hunt”), by its attorney, hereby submits Comments and additional information in support of its “Petition for Partial Reconsideration” filed in this proceeding requesting partial reconsideration of the *Report and Order*, FCC 17-137, issued in this proceeding.¹ With respect thereto, the following is stated:

In the *Report and Order*, the FCC for the first time determined that it would be in the public interest to eliminate the Main Studio Rule. As noted previously, De La Hunt agrees with that determination. As the *Report and Order* made clear as a part of the rationale underlying that decision:

We are persuaded that eliminating the rule will result in significant cost savings for broadcasters and other public interest benefits. For example, the record shows that in some small towns and rural areas the cost of complying with the current Main Studio Rule dissuades broadcasters from launching a station, even if the broadcaster has already obtained a construction permit for the station. Eliminating the rule thus may lead to increased broadcast service in those areas.

FCC 17-137, ¶ 11 (footnotes omitted).

This is the precise situation De La Hunt found itself in prior to the adoption of the *Report and Order*. De La Hunt is the holder of a construction permit for Pine River, Minnesota. File No.

¹ *Public Notice* of the Petition for Partial Reconsideration was published in the Federal Register on February 26, 2018, establishing a date of March 13, 2018 as the deadline date for filing Comments. 83 Fed Reg. 8182.

BNP-20041029AGK. The construction permit currently is scheduled to expire on April 23, 2018. Prior to the adoption of the *Report and Order*, the cost of complying with the Main Studio Rule made construction of the Pine River facility impractical. However, now that the Main Studio Rule has been eliminated, that elimination of the Rule for the first time is breathing new life into the feasibility of the construction of the Pine River facility and commencement of operations. In that respect, the *Report and Order* is potentially doing precisely that which it intended to do – namely, it will potentially serve to “lead to increase broadcast service.”

However, in this case, timing is crucial. Minnesota is in the midst of a particularly harsh Minnesota winter which makes construction of the proposed Pine River AM facility (a two-tower array with its accompanying ground systems) impossible during the next four months. Attached as Attachment 1 is data showing the past three months of weather in the Pine River area. Temperatures in the region are approximately 10-20 degrees colder than usual. Attachment 1. During the months of December, January, and February, the region’s low temperatures have been **below freezing** every single day; and during the period from December 12, 2017 – February 12, 2018, the region has experienced **below zero** low temperatures 40 days out of 63 days. Cold temperatures have reached as low as 31 degrees *below zero* (-31°). These temperatures during the months of December – February have departed from normal in a range from between -4.1° to -30.4° . Attachment 2. These extremely low temperatures have penetrated the ground, making ground excavation and construction impossible. This phenomenon has been exacerbated by the unusual lack of insulating snow this season. While ordinarily snow cover would lessen the penetration of cold into the ground, this year’s lack of snow (coupled with unusually extreme cold temperatures) has caused frost to penetrate more quickly and deeply than would ordinarily be the

case. As Mr. Timothy Pierson of Jones-Pearson Funeral Home (a local funeral home) reported recently:

we have currently 6.5 feet of frost in the ground. This requires three days of heating the ground for each grave we dig. The heating comes at a great expense... [and] in a construction project this effort and expense would not be practical or feasible.

Attachment 3. As Mr. Alan Dietz, an area contractor, reported recently:

With the lack of snow cover and extreme cold this winter has provided, we are not able to do any work of this [Pine River] project. Also, this spring with the frost being so deep it will take a long time for the frost to go out and road restrictions to go off. This could be mid to late May in that part of the state.

Attachment 4. In short, these frozen ground conditions have made the installation and construction of the required ground system for an AM radio station impossible for a prolonged period of time.

See Attachment 5.²

Therefore, in cases such as this, while the decision reached in the *Report and Order* has increased *in theory* the likelihood that new facilities now can be successfully constructed to serve their proposed communities, this rule change is less helpful for those permits that *already* are at the tail-end of their currently mandated construction periods. This also may be the case with other, similarly-situated unbuilt permits.

Accordingly, it again is requested that the *Report and Order* be modified to provide that any permittees with unbuilt construction permits for new facilities with less than six months left in their construction periods (as of the effective date of the new Main Studio Rule) be afforded an additional six-months beyond their current construction period, in order to allow the time necessary for them to construct facilities that will allow implementation of the new Main Studio Rule. Such flexibility would be consistent with Commission precedent. When granting FM

² A request for waiver of Section 73.3598 of the Commission's rules regarding the deadline date for construction of the facility has been requested from the Media Bureau. No action has to date been taken on that request.

Translators the right to file 250-mile waivers to be used for the broadcast of AM stations, the FCC afforded permits that were about to expire an additional six months within which to commence service. *Revitalization of the AM Radio Service*, 30 FCC Rcd 12145, 12152 ¶ 36 (2015). Similar relief is appropriate in this proceeding.

Adoption of this across-the-board extension will affect relatively few outstanding permits, but will undeniably be in the public interest, in so far as it will allow the FCC to fully implement its policy goal of permitting broadcasters that already had obtained construction permits (but that were dissuaded from launching their stations because of the prior Main Studio Rule) to instead have sufficient time to construct their permits for brand new facilities without the constraints of the prior Main Studio Rule, thereby providing increased broadcast service in such areas.

Expedited action on the Petition for Partial Reconsideration respectfully is requested.

WHEREFORE, it is requested that the Petition for Partial Reconsideration be granted.

Respectfully submitted,

**DE LA HUNT BROADCASTING
CORP.**

By: ____/Dan J. Alpert/_____
Dan J. Alpert

Its Attorney

*The Law Office of Dan J. Alpert
2120 N. 21st Rd.
Arlington, VA 22201
703-243-8690*

March 8, 2018

Attachment 1

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Pine River, MN



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November 2017

View:

December

2017

January 2018

Date	Hi/Lo	Precip	Snow	Forecast	Avg. HI / LO
Fri 12/1	36°/19°	0 IN	0 IN		28°/13°
Sat 12/2	45°/16°	0 IN	0 IN		27°/12°
Sun 12/3	37°/18°	0 IN	0 IN		27°/12°
Mon 12/4	39°/19°	0.22 IN	2.5 IN		26°/11°
Tue 12/5	18°/9°	0.09 IN	0.2 IN		26°/11°
Wed 12/6	16°/5°	0.06 IN	0.1 IN		25°/10°
Thu 12/7	19°/0°	0 IN	0 IN		25°/10°
Fri 12/8	27°/16°	0.06 IN	1.2 IN		25°/9°
Sat 12/9	19°/12°	0.17 IN	0 IN		24°/9°
Sun 12/10	27°/14°	0.03 IN	0.5 IN		24°/8°
Mon 12/11	30°/3°	0.13 IN	1.4 IN		24°/8°
Tue 12/12	18°/-4°	0.03 IN	0.1 IN		23°/8°
Wed 12/13	19°/12°	0.17 IN	1.0 IN		23°/7°
Thu 12/14	18°/12°	0.35 IN	0.1 IN		23°/7°
Fri 12/15	18°/9°	0.20 IN	0.7 IN		23°/6°
Sat 12/16	21°/16°	0.04 IN	0.3 IN		22°/6°
Sun 12/17	27°/21°	0 IN	0 IN		22°/6°
Mon 12/18	34°/18°	0.06 IN	0.6 IN		22°/5°
Tue 12/19	30°/7°	0.01 IN	0 IN		22°/5°

Date	Hi/Lo	Precip	Snow	Forecast	Avg. HI / LO
Wed 12/20	10°/1°	0.19 IN	1.7 IN		22°/5°
Thu 12/21	12°/-11°	0.13 IN	0.9 IN		21°/4°
Fri 12/22	16°/-17°	0.13 IN	0.6 IN		21°/4°
Sat 12/23	16°/1°	0.02 IN	0 IN		21°/4°
Sun 12/24	16°/-15°	0.26 IN	1.1 IN		21°/4°
Mon 12/25	-9°/-26°	0.07 IN	0 IN		21°/4°
Tue 12/26	-6°/-26°	0 IN	0 IN		21°/3°
Wed 12/27	-2°/-33°	0 IN	0 IN		20°/3°
Thu 12/28	3°/-8°	0.19 IN	1.8 IN		20°/3°
Fri 12/29	-2°/-17°	0.01 IN	0 IN		20°/3°
Sat 12/30	-9°/-24°	0 IN	0 IN		20°/2°
Sun 12/31	-8°/-33°	0 IN	0 IN		20°/2°

November 2017

January 2018


Temperature Graph December 2017



	Actual	Normal	Departure	Record
High	17°	23°		N/A° (N/A)
Low	0°	7°		N/A° (N/A)
Average	9°	15°	-6°	
Precip	2.62 in	0.85 in	+1.77 in	

	Actual	Normal	Departure	Record
Snow	14.8 in			





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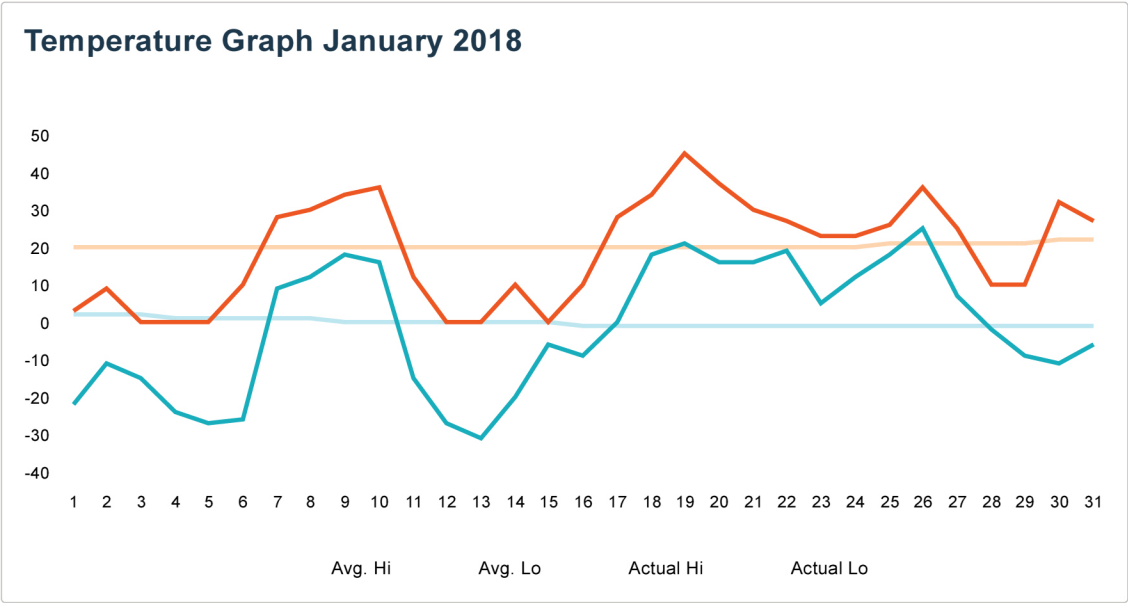


December 2017	View:	January	2018	February 2018	
Date	Hi/Lo	Precip	Snow	Forecast	Avg. HI / LO
Mon 1/1	3°/-22°	0 IN	0 IN		20°/2°
Tue 1/2	9°/-11°	0.02 IN	0 IN		20°/2°
Wed 1/3	0°/-15°	0 IN	0 IN		20°/2°
Thu 1/4	0°/-24°	0 IN	0 IN		20°/1°
Fri 1/5	0°/-27°	0 IN	0 IN		20°/1°
Sat 1/6	10°/-26°	0 IN	0.1 IN		20°/1°
Sun 1/7	28°/9°	0 IN	0 IN		20°/1°
Mon 1/8	30°/12°	0 IN	0 IN		20°/1°
Tue 1/9	34°/18°	0 IN	0 IN		20°/0°
Wed 1/10	36°/16°	0.10 IN	0.4 IN		20°/0°
Thu 1/11	12°/-15°	0.23 IN	3.4 IN		20°/0°
Fri 1/12	0°/-27°	0 IN	0 IN		20°/0°
Sat 1/13	0°/-31°	0 IN	0 IN		20°/0°
Sun 1/14	10°/-20°	0.17 IN	0.9 IN		20°/0°
Mon 1/15	0°/-6°	0.07 IN	1.0 IN		20°/0°
Tue 1/16	10°/-9°	0 IN	0 IN		20°/-1°
Wed 1/17	28°/0°	0 IN	0 IN		20°/-1°
Thu 1/18	34°/18°	0 IN	0.1 IN		20°/-1°
Fri 1/19	45°/21°	0 IN	0 IN		20°/-1°

Date	Hi/Lo	Precip	Snow	Forecast	Avg. HI / LO
Sat 1/20	37°/16°	0 IN	0.1 IN		20°/-1°
Sun 1/21	30°/16°	0 IN	0 IN		20°/-1°
Mon 1/22	27°/19°	0 IN	0 IN		20°/-1°
Tue 1/23	23°/5°	0 IN	0 IN		20°/-1°
Wed 1/24	23°/12°	0 IN	0 IN		20°/-1°
Thu 1/25	26°/18°	0 IN	0 IN		21°/-1°
Fri 1/26	36°/25°	0.03 IN	0.2 IN		21°/-1°
Sat 1/27	25°/7°	0.04 IN	0.1 IN		21°/-1°
Sun 1/28	10°/-2°	0.08 IN	0.1 IN		21°/-1°
Mon 1/29	10°/-9°	0 IN	0 IN		21°/-1°
Tue 1/30	32°/-11°	0.04 IN	0.9 IN		22°/-1°
Wed 1/31	27°/-6°	0.05 IN	0.2 IN		22°/-1°


December 2017

February 2018



	Actual	Normal	Departure	Record
High	19°	20°		N/A° (N/A)
Low	-2°	0°		N/A° (N/A)
Average	9°	10°	-1°	
Precip	0.83 in	0.71 in	+0.12 in	


	Actual	Normal	Departure	Record
Snow	7.5 in			



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January 2018

View:

February

2018

March 2018

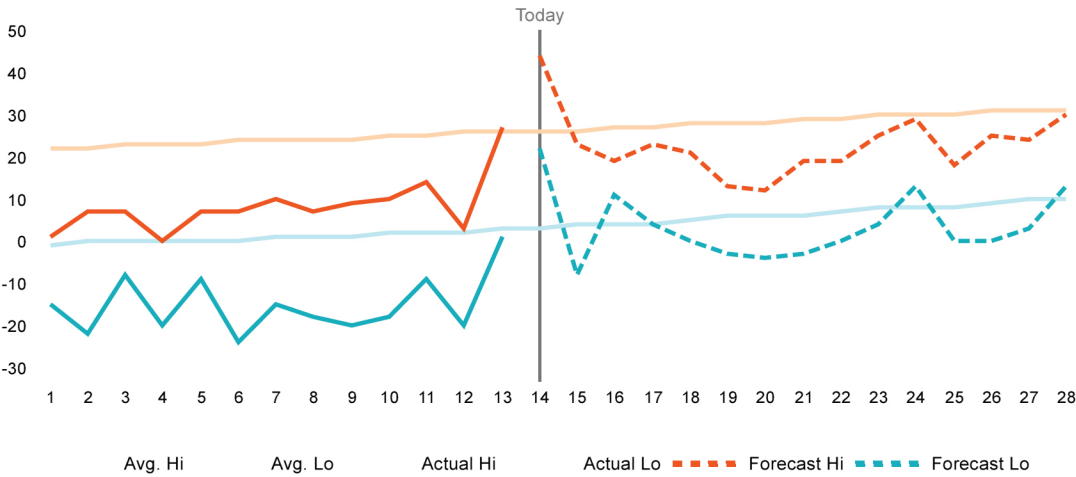
Date	Hi/Low	Precip	Snow	Forecast	Avg. HI / LO
Thu 2/1	1°/-15°	0 IN	0 IN		22°/-1°
Fri 2/2	7°/-22°	0.12 IN	1.3 IN		22°/0°
Sat 2/3	7°/-8°	0.28 IN	2.0 IN		23°/0°
Sun 2/4	0°/-20°	0 IN	0 IN		23°/0°
Mon 2/5	7°/-9°	0 IN	0 IN		23°/0°
Tue 2/6	7°/-24°	0.11 IN	0 IN		24°/0°
Wed 2/7	10°/-15°	0.16 IN	1.1 IN		24°/1°
Thu 2/8	7°/-18°	0.02 IN	0.3 IN		24°/1°
Fri 2/9	9°/-20°	0 IN	0 IN		24°/1°
Sat 2/10	10°/-18°	0 IN	0 IN		25°/2°
Sun 2/11	14°/-9°	0 IN	0 IN		25°/2°
Mon 2/12	3°/-20°	0 IN	0 IN		26°/2°
Tue 2/13	27°/1°	0.04 IN	0.4 IN		26°/3°
Wed 2/14	44°/22°	0 IN	0 IN	Mostly sunny and milder	26°/3°
Thu 2/15	23°/-8°	0.06 IN	1.1 IN	Much colder with snow, 1-2"	26°/4°
Fri 2/16	19°/11°	0 IN	0 IN	Mainly cloudy and cold	27°/4°
Sat 2/17	23°/4°	0.02 IN	0.7 IN	Sunny intervals; not as cold	27°/4°
Sun 2/18	21°/0°	0.05 IN	1 IN	Cloudy with a bit of snow	28°/5°
Mon 2/19	13°/-3°	0.1 IN	3.1 IN	Periods of snow	28°/6°

Date	Hi/Lo	Precip	Snow	Forecast	Avg. HI / LO
Tue 2/20	12°/-4°	0 IN	0 IN	Cloudy, snow showers possible	28°/6°
Wed 2/21	19°/-3°	0 IN	0 IN	Mostly cloudy	29°/6°
Thu 2/22	19°/0°	0 IN	0 IN	Plenty of sunshine	29°/7°
Fri 2/23	25°/4°	0 IN	0 IN	Partial sunshine	30°/8°
Sat 2/24	29°/13°	0 IN	0 IN	A chance for a snow shower	30°/8°
Sun 2/25	18°/0°	0 IN	0 IN	Considerable cloudiness	30°/8°
Mon 2/26	25°/0°	0 IN	0 IN	Sun and some clouds	31°/9°
Tue 2/27	24°/3°	0 IN	0 IN	Mostly sunny	31°/10°
Wed 2/28	30°/13°	0.01 IN	0.2 IN	Increasing cloudiness	31°/10°

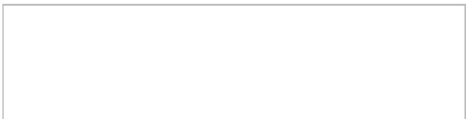
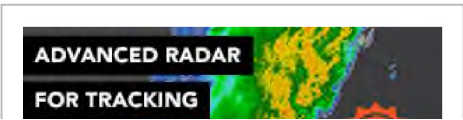
January 2018

March 2018

Temperature Graph February 2018



	Actual	Normal	Departure	Record
High	8°	26°		N/A° (N/A)
Low	-15°	4°		N/A° (N/A)
Average	-3°	15°	-18°	
Precip	0.73 in	0.54 in	+0.19 in	
Snow	5.1 in			



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Attachment 2

Subject:Park Rapids Winter Temperatures

Date:Fri, 16 Feb 2018 16:10:25 -0600

From:Brad Hopkins - NOAA Federal <brad.hopkins@noaa.gov>

To:KPRMKDKK@unitelc.com

Ed,

Per our conversation, I looked up the data of interest to you.

I attached a document that is an extract of temperature and precipitation data for the Park Rapids airport from Dec 1, 2017 to Feb 15, 2018. This period defines the climatological winter (Dec 1-Feb 28). The data can also be found on our website and is known as NOWData. You just have to select Park Rapids Municipal Airport and keep the "Daily Data for a Month" checked off, select the month using the calendar icon, and click "Go". The link is found here:

<http://w2.weather.gov/climate/xmacis.php?wfo=fgf>

At the top of the columns on the attached document, I highlighted the header "Dep" which shows the departure from normal for a particular date. Negative numbers would denote below normal values. As you look at the tables, you will note periods of temperatures that were well below normal, on some days as much as 30 degrees below normal.

You can access deep soil temperatures from the North Dakota Agricultural Network. The closest sites to Park Rapids is Grand Forks and Fargo. At present, frost depth temperatures range from 31 to 41 inches below the ground. The last reading we had here at the office in Grand Forks was 37 inches, or just a little over 3 feet. This is due to the shallow snow cover which varied between 5 to 15 inches. Snow depth at this time is running about 6 to 10 inches across the region. The deep soil temperature readings can be found here:

<https://ndawn.ndsu.nodak.edu/deep-soil-temperatures.html>

Hope this answers your questions. Please let me know if you have any other questions or concerns.

Respectfully,

Brad Hopkins

--

Bradley N. Hopkins

Meteorologist/Observing Program Leader

NWS Eastern North Dakota/Grand Forks

4797 Technology Circle

Grand Forks, ND 58203

Phone: [701-795-5119](tel:701-795-5119)

e-mail: brad.hopkins@noaa.gov

Climatological Data for PARK RAPIDS MUNICIPAL AP, MN - December 2017

Click column heading to sort ascending, click again to sort descending.

Date	Hi	Lo	Avg	Dep	HDD	CDD	Precip
2017-12-01	38	23	30.5	13.3	34	0	0.00
2017-12-02	47	16	31.5	14.8	33	0	0.00
2017-12-03	38	20	29.0	12.8	36	0	0.00
2017-12-04	40	17	28.5	12.8	36	0	0.21
2017-12-05	17	8	12.5	-2.8	52	0	T
2017-12-06	15	3	9.0	-5.8	56	0	T
2017-12-07	23	0	11.5	-2.9	53	0	0.00
2017-12-08	29	14	21.5	7.5	43	0	T
2017-12-09	20	12	16.0	2.4	49	0	T
2017-12-10	27	12	19.5	6.3	45	0	0.04
2017-12-11	33	1	17.0	4.2	48	0	0.07
2017-12-12	23	-7	8.0	-4.5	57	0	0.09
2017-12-13	27	13	20.0	7.9	45	0	0.02
2017-12-14	19	10	14.5	2.7	50	0	T
2017-12-15	19	5	12.0	0.5	53	0	0.04
2017-12-16	26	19	22.5	11.3	42	0	T
2017-12-17	30	22	26.0	15.1	39	0	0.00
2017-12-18	34	22	28.0	17.4	37	0	0.01
2017-12-19	33	0	16.5	6.2	48	0	T
2017-12-20	12	0	6.0	-4.1	59	0	0.07
2017-12-21	14	-11	1.5	-8.3	63	0	0.02
2017-12-22	17	-14	1.5	-8.1	63	0	0.01
2017-12-23	17	-9	4.0	-5.4	61	0	T
2017-12-24	17	-18	-0.5	-9.6	65	0	T
2017-12-25	-12	-31	-21.5	-30.4	86	0	T
2017-12-26	-9	-28	-18.5	-27.2	83	0	0.00
2017-12-27	0	-34	-17.0	-25.6	82	0	T
2017-12-28	7	-13	-3.0	-11.4	68	0	0.01
2017-12-29	-3	-22	-12.5	-20.7	77	0	T
2017-12-30	-10	-30	-20.0	-28.0	85	0	0.00
2017-12-31	-11	-34	-22.5	-30.4	87	0	0.00
Sum	577	-34	-	-	1735	0	0.59
Average	18.6	-1.1	8.8	-2.8	-	-	-
Normal	20.6	2.7	11.6	-	1654	0	0.57

Climatological Data for PARK RAPIDS MUNICIPAL AP, MN - January 2018

Click column heading to sort ascending, click again to sort descending.

Date	Hi	Lo	Avg	Dep	HDD	CDD	Precip
2018-01-01	2	-27	-12.5	-20.2	77	0	T
2018-01-02	9	-16	-3.5	-11.1	68	0	T
2018-01-03	-1	-15	-8.0	-15.4	73	0	T
2018-01-04	2	-23	-10.5	-17.8	75	0	0.00
2018-01-05	-3	-29	-16.0	-23.2	81	0	0.00
2018-01-06	11	-28	-8.5	-15.6	73	0	0.00
2018-01-07	30	6	18.0	11.0	47	0	0.00
2018-01-08	30	11	20.5	13.6	44	0	0.00
2018-01-09	36	20	28.0	21.2	37	0	0.00
2018-01-10	37	9	23.0	16.3	42	0	0.02
2018-01-11	9	-17	-4.0	-10.6	69	0	T
2018-01-12	0	-32	-16.0	-22.5	81	0	T
2018-01-13	2	-29	-13.5	-20.0	78	0	0.00
2018-01-14	15	-15	0.0	-6.4	65	0	0.01
2018-01-15	-2	-8	-5.0	-11.4	70	0	T
2018-01-16	8	-20	-6.0	-12.4	71	0	0.00
2018-01-17	27	0	13.5	7.1	51	0	0.00
2018-01-18	35	20	27.5	21.1	37	0	0.00
2018-01-19	44	22	33.0	26.6	32	0	0.00
2018-01-20	36	14	25.0	18.6	40	0	0.00
2018-01-21	29	12	20.5	14.0	44	0	0.00
2018-01-22	27	21	24.0	17.5	41	0	0.00
2018-01-23	25	10	17.5	10.9	47	0	0.00
2018-01-24	22	19	20.5	13.8	44	0	0.00
2018-01-25	24	20	22.0	15.2	43	0	0.00
2018-01-26	35	22	28.5	21.6	36	0	T
2018-01-27	25	3	14.0	7.0	51	0	T
2018-01-28	13	-5	4.0	-3.1	61	0	T
2018-01-29	12	-13	-0.5	-7.8	65	0	0.00
2018-01-30	29	-8	10.5	3.0	54	0	T
2018-01-31	29	-6	11.5	3.8	53	0	T
Sum	597	-82	-	-	1750	0	0.03
Average	19.3	-2.6	8.3	1.5	-	-	-
Normal	17.6	-3.9	6.8	-	1803	0	0.52

Climatological Data for PARK RAPIDS MUNICIPAL AP, MN - February 2018

Click column heading to sort ascending, click again to sort descending.

Date	Hi	Lo	Avg	Dep	HDD	CDD	Precip
2018-02-01	0	-17	-8.5	-16.4	73	0	0.00
2018-02-02	9	-18	-4.5	-12.6	69	0	T
2018-02-03	8	-11	-1.5	-9.8	66	0	0.04
2018-02-04	-2	-28	-15.0	-23.6	80	0	T
2018-02-05	6	-19	-6.5	-15.4	71	0	0.00
2018-02-06	5	-22	-8.5	-17.6	73	0	0.01
2018-02-07	8	-11	-1.5	-10.9	66	0	T
2018-02-08	7	-20	-6.5	-16.3	71	0	T
2018-02-09	5	-23	-9.0	-19.1	74	0	T
2018-02-10	8	-16	-4.0	-14.4	69	0	0.00
2018-02-11	14	-14	0.0	-10.8	65	0	T
2018-02-12	5	-23	-9.0	-20.1	74	0	0.00
2018-02-13	26	2	14.0	2.5	51	0	T
2018-02-14	45	11	28.0	16.1	37	0	0.00
2018-02-15	34	-10	12.0	-0.3	53	0	0.00
2018-02-16	M	M	M	M	M	M	M
2018-02-17	M	M	M	M	M	M	M
2018-02-18	M	M	M	M	M	M	M
2018-02-19	M	M	M	M	M	M	M
2018-02-20	M	M	M	M	M	M	M
2018-02-21	M	M	M	M	M	M	M
2018-02-22	M	M	M	M	M	M	M
2018-02-23	M	M	M	M	M	M	M
2018-02-24	M	M	M	M	M	M	M
2018-02-25	M	M	M	M	M	M	M
2018-02-26	M	M	M	M	M	M	M
2018-02-27	M	M	M	M	M	M	M
2018-02-28	M	M	M	M	M	M	M
Sum	178	-219	-	-	992	0	0.05
Average	11.9	-14.6	-1.4	-11.3	-	-	-
Normal	21.4	-1.6	9.9	-	827	0	0.20

Attachment 3



Jones-Pearson

FUNERAL HOME

608 SOUTH PARK • PARK RAPIDS, MINNESOTA 56470 • (218) 732-5131

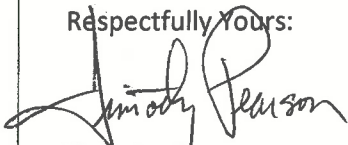
February 21, 2018

To Whom it May Concern:

My name is Timothy Pearson. I own and operate the Jones-Pearson Funeral Home in Park Rapids, MN where we serve 135 families per year in the funeral and burial arrangements of their deceased loved ones. I was asked to write you to comment on the depth of the frost this year with our brutally cold temperatures and until the last couple of days, our lack of snow cover to insulate the ground. The fact of the matter is we have currently 6.5 feet of frost in the ground. This requires three days of heating the ground for each grave we dig. This heating comes at a great expense and of course in an effort to meet the emotional and practical needs of the families we serve we always try to thaw the ground. However in a construction project this effort and expense would not be practical or feasible.

If I can answer any questions or be of further assistance please do not hesitate to contact me at the phone listed above.

Respectfully Yours:



Timothy Pearson

Attachment 4

DIETZ BROTHERS INC.

12185 51ST STREET NE

PO BOX 670

SPICER MINNESOTA 56288

320-796-2281 OFFICE 320-894-5957 ALAN'S CELL

To whom it may concern:

We have been working with Ed on a new AM tower and ground system near Pine River, MN. With the lack of snow cover and extreme cold this winter has provided, we are not able to do any work on this project. Also, this spring with the frost being so deep it will take a long time for the frost to go out and road restrictions to go off. This could be mid to late May in that part of the state.

A handwritten signature in black ink, appearing to read "Alan Dietz". The signature is stylized with a large, looped "A" and a cursive "Dietz".

Alan Dietz

Attachment 5

02.19.2018

To: Whom It May Concern

To Whom It May Concern,

As a septic maintenance provider & installer for this area, we have had an unusually large number of area residents struggling with frozen sewer lines and septic tanks who haven't had problems in past winters. It's our reasonable assumption that these freeze-ups are due to an unusual amount of continuous days and nights with sub-zero temperatures and an unexpected lack of snow for this area that is causing the frost to go deeper into the ground than normal. Because of the increased depth of the frost in the ground, it's reasonable to anticipate that our excavation & installation season could be starting later than it typically does.

Thelen's Excavating & Septic, Inc.
Park Rapids, MN 56470
218.732.0015

Thelen's Excavating Inc.

32996 County Rd 135
Park Rapids, MN 56470

Phone: 218-732-0015
Fax: 218-732-4089

thelensexcavating@gmail.com

