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Before the
FEDERAL COMMUNICATIONS COMMISSION
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Modifying Renewal Dates for)
Certain Stations Licensed)
Under Part 74 of the)
Commission's Rules; and)
Revising FCC Form 303-S, Application)
for Renewal of License for Commercial)
and Noncommercial AM, FM or TV)
Broadcast Station)

MM Docket No. 92-168

To: The Commission

COMMENTS OF MINNESOTA PUBLIC RADIO

Minnesota Public Radio ("MPR"), by its attorneys, hereby submits its comments in the above-referenced proceeding. MPR applauds the Commission's efforts to reduce the burden of renewing licenses for translator facilities, and supports the proposed modifications to the Commission's Rules, as clarified by MPR below.

I. Statement of Interest

MPR is a nonprofit corporation formed for the purpose of providing noncommercial educational radio service to listeners in Minnesota and surrounding states. MPR's twenty-five operating full power FM facilities and thirteen FM translators provide 24 hours-per-day quality programming accessible to 95% of Minnesota's residents, as well as to substantial numbers of listeners in North and South Dakota,

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List A B C D E

Iowa, Wisconsin, Michigan and southern Ontario.¹ MPR provides programming to its network of stations from its primary Minneapolis/St. Paul stations -- KSJN(FM) (arts and performance), Minneapolis, Minnesota, and KNOW-FM (news and information), St. Paul, Minnesota, and, to a lesser extent, from many of its network stations throughout the region.

II. The Proposed Modifications Will Reduce the Administrative Cost of Renewing Translator Licenses and Enhance Public Awareness of the Licensing Process.

MPR supports the Commission's two proposed modifications to its Rules regarding renewal of translator licenses.² Each proposal will substantially ease the administrative burden on both licensees and the Commission in filing for and processing translator license renewal applications, and will enhance public understanding of the Commission's licensing processes.

First, the Commission proposes to conform the filing dates for full power stations and translator facilities in the same state. MPR agrees with the Commission that the

¹ In addition, MPR recently received construction permits for an FM station in Decorah, Iowa, and for an additional seven translators to serve Marshall, Grand Rapids (two stations), Owatonna, Austin, Wabasha, and Winona, Minnesota. Applications for new translators to serve International Falls and Bemidji, Minnesota are pending. A list of MPR's FM full power stations and FM translators is attached as an Appendix.

² Notice of Proposed Rule Making, MM Docket No. 92-168, rel. Aug. 4, 1992, at 1 ("Notice"). MPR's comments are limited to the Commission's proposals as they apply to FM translators.

proposed change will enhance the efficiency of renewal procedures. For example, MPR is licensed to operate full power radio stations in five states, and holds licenses or construction permits for translators in three of those states. Under the existing renewal system, MPR must track and respond to seven different filing deadlines to renew all main station and translator facilities within the system.³ By coordinating renewals for main stations and translators in the same state, the number of filing dates to which MPR must respond will be reduced to four. Other licensees with broadcast networks also would benefit from the Commission's proposal.

Second, the Commission proposes to modify Form 303-S to permit licensees of full power stations, which also seek to renew commonly owned translators with the same filing date, to use one application form to renew all such licenses.⁴ As

³ The renewal dates for MPR's FM facilities are: June 1996 (MI); Oct. 1996 (IA); Dec. 1996 (MN and SD); and June 1997 (ID). The renewal dates for MPR's translators are: Oct. 1995 (ID); Aug. 1997 (MI); and April 1998 (MN).

⁴ In 1981, the Commission modified the renewal process for broadcast auxiliary services so that those facilities automatically would be renewed with the main station license. Radio Broadcast Services: Revision of Applications for Renewal of License of Commercial and Noncommercial AM, FM and Television Licensees, 49 R.R.2d 740 (1981). The modification substantially reduced the burden on both licensees and the Commission to prepare and process such applications, and was overwhelmingly supported by licensees. The Commission's proposal in the Notice to simplify the renewal process for translators similarly should produce the same tangible benefits.

the Commission noted, much of the information requested in the separate renewal forms for main stations and translators is redundant. Thus, by combining forms, both the Commission and licensees will be able to conserve valuable and scarce financial resources.

Further, MPR agrees with the Commission that the public will be better able to understand the renewal process if commonly owned facilities with the same filing date are renewed simultaneously. Under the proposed rules, local public notice of the filing of renewal applications for the translator and the primary station being rebroadcast would be made concurrently. Thus, the proposed changes may help alleviate unnecessary confusion over the licensing process.

Finally, MPR requests the Commission to clarify its proposal to modify Form 303-S in one important respect. MPR urges the Commission to permit licensees of full power stations to renew commonly owned translators with the same renewal date on a single application form, without regard to whether that full power station is the primary facility being rebroadcast by the translator.⁵ Thus, a licensee with more than one full power station could file for renewal of commonly owned translators on the same application form as

⁵ MPR notes that the Commission proposes to conform the filing dates between translators and full power stations on the basis of location, rather than the relationship between the translator and the primary station being rebroadcast.

any of the licensee's main stations with the same filing date. For example, a state or regional radio network, like MPR, could file for renewal of its translators under the renewal application for the "flagship" station, such as MPR's KSJN or KNOW.

In the Notice, the Commission emphasized the public interest benefits of "eliminat[ing] or minimiz[ing] to the greatest extent possible multiple renewal filings by licensees of commonly owned full power and translator and LPTV stations."⁶ To this end, the Commission proposed to permit "a broadcaster to file a single renewal application to cover all of its broadcast stations having the same renewal date."⁷ By combining all such translators under one form without reference to the primary station, the administrative burden confronted by licensees would in fact be "minimized."

Further, MPR submits that permitting such filings would maintain the public's ability to follow and participate in the licensing process. Licensees of translators still would be obligated to provide for local public notice of the filing of the renewal application, and to place all relevant materials in the local public inspection file. Thus, the public would continue to benefit from unencumbered access to

⁶ Notice, at 1.

⁷ Id.

information regarding the license renewal process for translators.

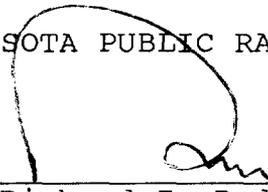
III. Conclusion

MPR enthusiastically supports the Commission's proposals, as clarified above, to conform renewal filing dates for main stations and translators, and to permit licensees to file for renewal of commonly owned facilities under one Form 303-S. The modifications substantially should reduce the administrative burden and cost imposed on licensees and the Commission in preparing and processing such applications, and would promote public awareness of the renewal process.

Respectfully submitted,

MINNESOTA PUBLIC RADIO

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APPENDIX

Minnesota Public Radio holds licenses and/or construction permits for the following noncommercial radio stations:

KBPR	FM	Brainerd, MN
KCCD	FM	Moorhead, MN/Fargo, ND
KCCM	FM	Moorhead, MN
KCRB	FM	Bemidji, MN
KGAC	FM	Saint Peter, MN
KLCD	FM	Decorah, IA
900129MI		Decorah, IA
KLSE	FM	Rochester, MN
KNGA	FM	St. Peter/Mankato, MN
KRSU	FM	Appleton, MN
KNSR	FM	Collegeville, MN
KNTN	FM	Thief River Falls, MN
KQMN	FM	Thief River Falls, MN
KRSD	FM	Sioux Falls, SD
KRSW	FM	Worthington/Marshall, MN
KNOW	AM	Minneapolis/St. Paul, MN
KNOW	FM	St. Paul/ Minneapolis, MN
KSJN	FM	Minneapolis/St. Paul, MN
KSJR	FM	Collegeville, MN
KXLC	FM	La Crescent, MN
KZSE	FM	Rochester, MN
KWRV	FM	Sun Valley, ID
WGGL	FM	Houghton, MI
WIRR	FM	Virginia/Hibbing, MN

WSCD FM Duluth, MN
WSCN FM Cloquet, MN

Minnesota Public Radio holds licenses or construction permits for the following noncommercial educational FM translators:

K269DW Albert Lea, MN
K209BA Fergus Falls, MN
K249BK International Falls, MN
K215BL Alexandria, MN
K214BM Worthington, MN
K201BW La Crosse, WI/La Crescent, MN
K232AQ Austin, MN
W215AI Roseau, MN
K292CT Winona, MN
W224AO Houghton, MI
K212AT Marshall, MN
K201BX Morris, MN
K205BW Sun Valley, ID
920228TG Grand Rapids, MN
920228TF Grand Rapids, MN
920229TH Owatonna, MN
920228TE Austin, MN
920228TC Winona, MN
920228TD Wabasha, MN

Minnesota Public Radio has applied for the following new noncommercial educational FM translators:

920302TE Bemidji, MN
920228TD International Falls, MN