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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b) ) RM-  
Table of Allotments, )  
FM Broadcast Stations. )  
 )  
(Tracy, Minnesota) )

To: Mass Media Bureau (Policy & Rules)

Petition for Rule Making

Plum Creek Broadcasting Company, Inc., licensee of FM station KARL Tracy, Minnesota ("KARL"), by its attorney, respectfully petitions for rule making so as to substitute Channel 286C3 in place of Channel 286A at Tracy, Minnesota. In support thereof, the following is shown.

KARL, as a Class A station, is limited in its power and coverage. An upgrade to Class C3 will permit the station to serve a substantially larger area and more listeners. According to the Engineering Statement of Owl Engineering, attached hereto, the proposed reference coordinates are North Latitude 44° 13' 46"; West Longitude 95° 44' 36". From these coordinates Channel 286A may be upgraded to Channel 286C3 with a ten kilometer site restriction west of Tracy consistent with all spacing requirements and good engineering practice. The public interest will be served by adoption of the rule making proposed herein.

KARL will promptly apply for a construction permit for

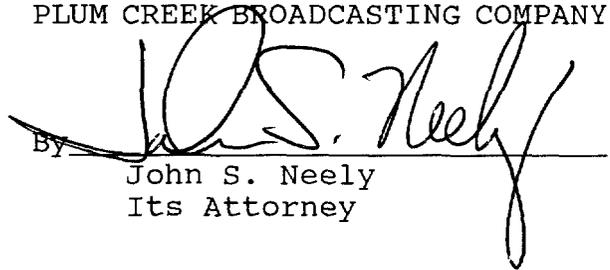
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the improved facilities upon favorable Commission action on this petition, and will promptly construct the new facilities upon grant of the application.

In view of the above, the Commission should amend Section 73.202(b) as requested herein and modify the facilities of FM station KARL accordingly.

Respectfully Submitted,

PLUM CREEK BROADCASTING COMPANY

By  \_\_\_\_\_  
John S. Neely  
Its Attorney

January 7, 1993

Miller & Miller, P.C.  
P.O. Box 33003  
Washington, DC 20033

**ENGINEERING STATEMENT ON BEHALF OF  
PLUM CREEK BROADCASTING  
IN SUPPORT OF A PETITION TO AMEND  
THE FM TABLE OF ALLOTMENTS  
CHANNEL 286C3 TO TRACY, MINNESOTA**

Owl Engineering, Inc. has been retained by Plum Creek Broadcasting (hereafter Plum Creek) to prepare this Engineering Statement in support of a petition to amend the FM Table of Allotments, FCC Rules Section 73.202(b) as follows:

<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Tracy, MN	286A	286C3

The reference coordinates used for this study are:

44 13' 46" North Latitude  
95 44' 36" West Longitude

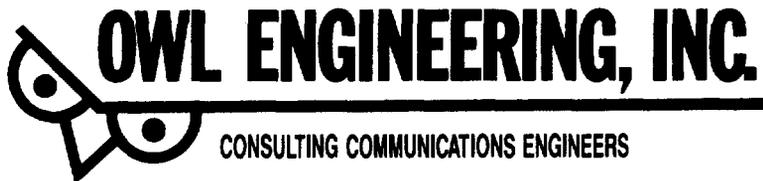
A maximized class C3 facility operating from the proposed site coordinates will provide 60 dBu (1 mV/m) signal coverage to the population encompassed by an area of approximately 4,693 square kilometers. Tracy has a population of 2,059 based on 1990 U.S. Census data.

The proposal of Plum Creek was evaluated to determine if the proposed site coordinates would meet FCC spacing requirements. That analysis is attached as Engineering Exhibit E-1. As can be seen from exhibit E-1, Plum Creek's proposal meets all FCC spacing requirements set forth in section 73.207 of the FCC Rules. The reference coordinates proposed by Plum Creek represent a 10 kilometer site restriction to the west of Tracy.



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CHANNEL 286C3 TO TRACY, MINNESOTA**

The proposal of Plum Creek was evaluated to determine if the proposed site would meet FCC signal coverage requirements. The distance from the reference coordinates to the city of Tracy is 10 kilometers at a bearing of 87.5 degrees. The three to sixteen kilometer average terrain was computed using the NGDC data base and the distance to contours was computed using the FCC F(50,50) metric curves. The distance to the 70 dBu contour along the radial through the principle city was calculated to be 25.6 kilometers, surpassing the city by some 15 kilometers. Engineering Exhibit E-2 shows the 70 dBu signal contour plotted and demonstrates that the entire city of Tracy is served by a signal strength of 70 dBu or greater. In addition to the Exhibit showing the FCC predicted 70 dBu contour covering Tracy, a detailed terrain study was performed utilizing the Defense Mapping Agency's digitized terrain database containing terrain elevation for every 3-arc seconds of latitude and longitude. The terrain elevations from the proposed tower site to the most distant edge of Tracy was retrieved and plotted versus antenna height. Engineering Exhibit E-3 shows the results of the plot. As can be seen from this exhibit there are no major obstacles in the path to the principle community. Clearly, the proposal of Plum Creek meets the requirements of FCC Rules section 73.315(a).



CONSULTING COMMUNICATIONS ENGINEERS

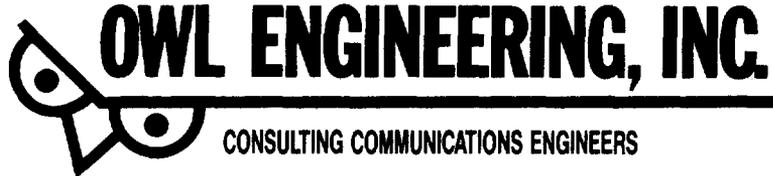
1306 W. County Road F, St. Paul, MN 55112  
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**ENGINEERING STATEMENT ON BEHALF OF  
PLUM CREEK BROADCASTING  
IN SUPPORT OF A PETITION TO AMEND  
THE FM TABLE OF ALLOTMENTS  
CHANNEL 286C3 TO TRACY, MINNESOTA**

A comparison of the area/population served by the 60 dBu coverage contour of the higher class channel to Class A facilities was completed. Utilizing the reference Height Above Average Terrain (HAAT) and Effective Radiated Power (ERP) for each class of station, the following data was calculated:

Station Class	Area Served km <sup>2</sup>	Population Served (1990 Census)
C3	4,693	39,252
A	2,524	26,095

Based on the above calculations, it can be determined that the proposed class C3 facilities will increase the area served by 86 percent and the population served by 50 percent.



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CHANNEL 286C3 TO TRACY, MINNESOTA**

**CONCLUSIONS**

1. The proposal will provide Tracy with a full time regional broadcast service.
2. The proposal will meet the requirements of FCC Rules Section 73.315.
3. The proposal will meet the requirements of FCC Rules Section 73.207.
4. The proposal will increase the area served by 86 percent.
5. The proposal will increase the population served by 50 percent.

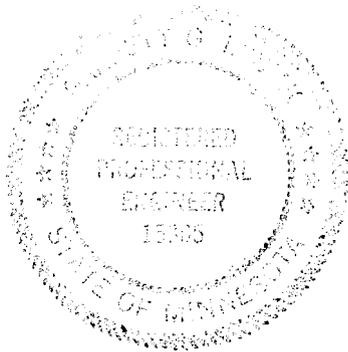
**ENGINEERING STATEMENT ON BEHALF OF  
 PLUM CREEK BROADCASTING  
 IN SUPPORT OF A PETITION TO AMEND  
 THE FM TABLE OF ALLOTMENTS  
 CHANNEL 286C3 TO TRACY, MINNESOTA**

AFFIDAVIT

RAMSEY COUNTY                    )  
   )  
 STATE OF MINNESOTA            )

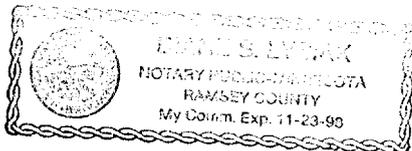
ss:

Garrett G. Lysiak, being first duly sworn, says that he is president of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota; that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission; that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



*Garrett G. Lysiak*  
 Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date December 4, 1992



*Diane S. Lysiak*  
 Diane S. Lysiak  
 Notary Public

My commission expires November 23, 1998



# OWL ENGINEERING, INC.

CONSULTING COMMUNICATIONS ENGINEERS

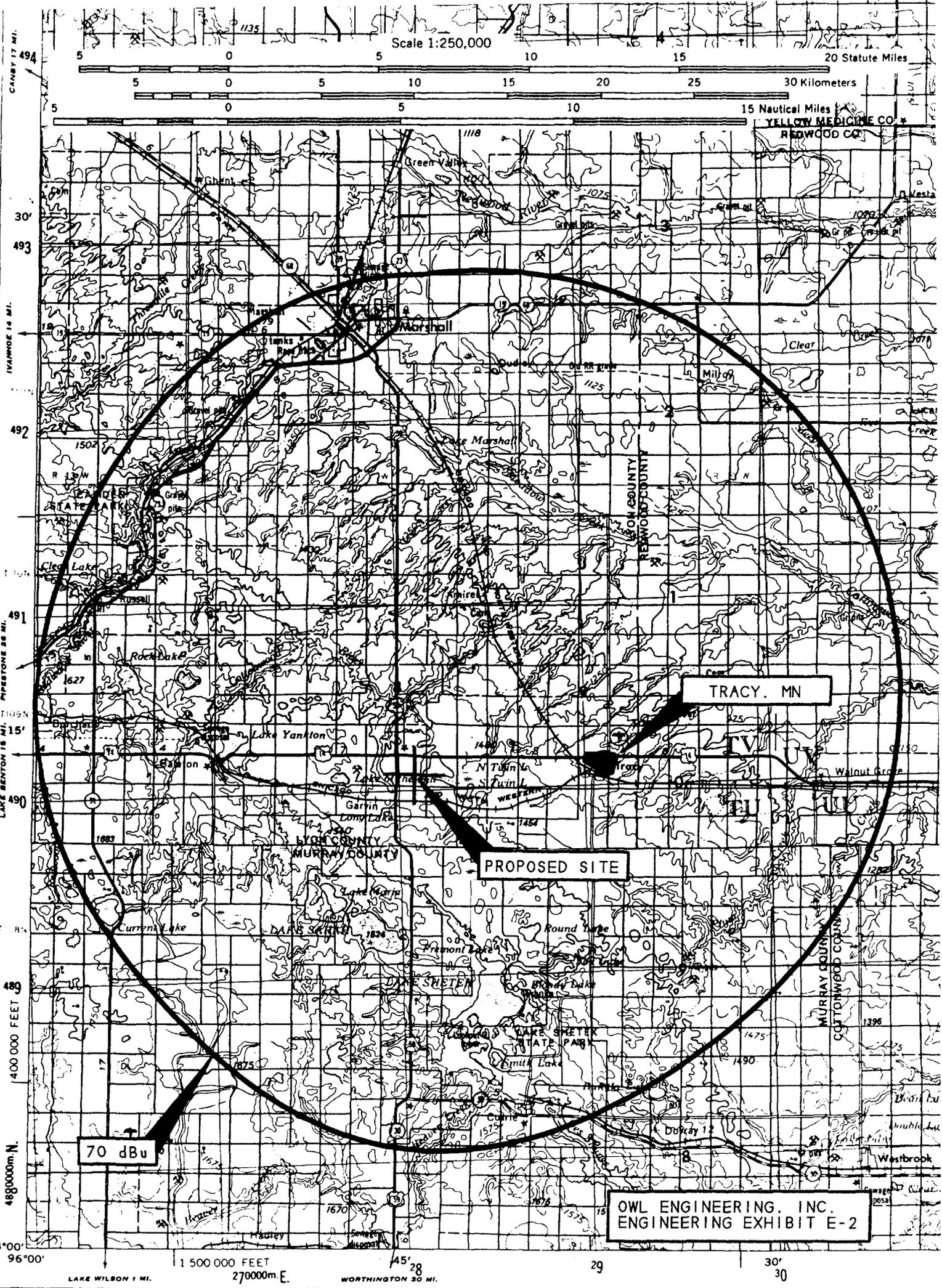
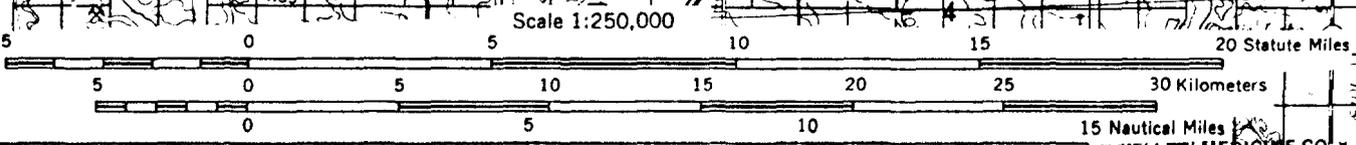
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## ENGINEERING EXHIBIT E-1 PLUM CREEK BROADCASTING IN SUPPORT OF A PETITION TO AMEND THE FM TABLE OF ALLOTMENTS CHANNEL 286C3 TO TRACY, MINNESOTA

FM Channel 286-C3

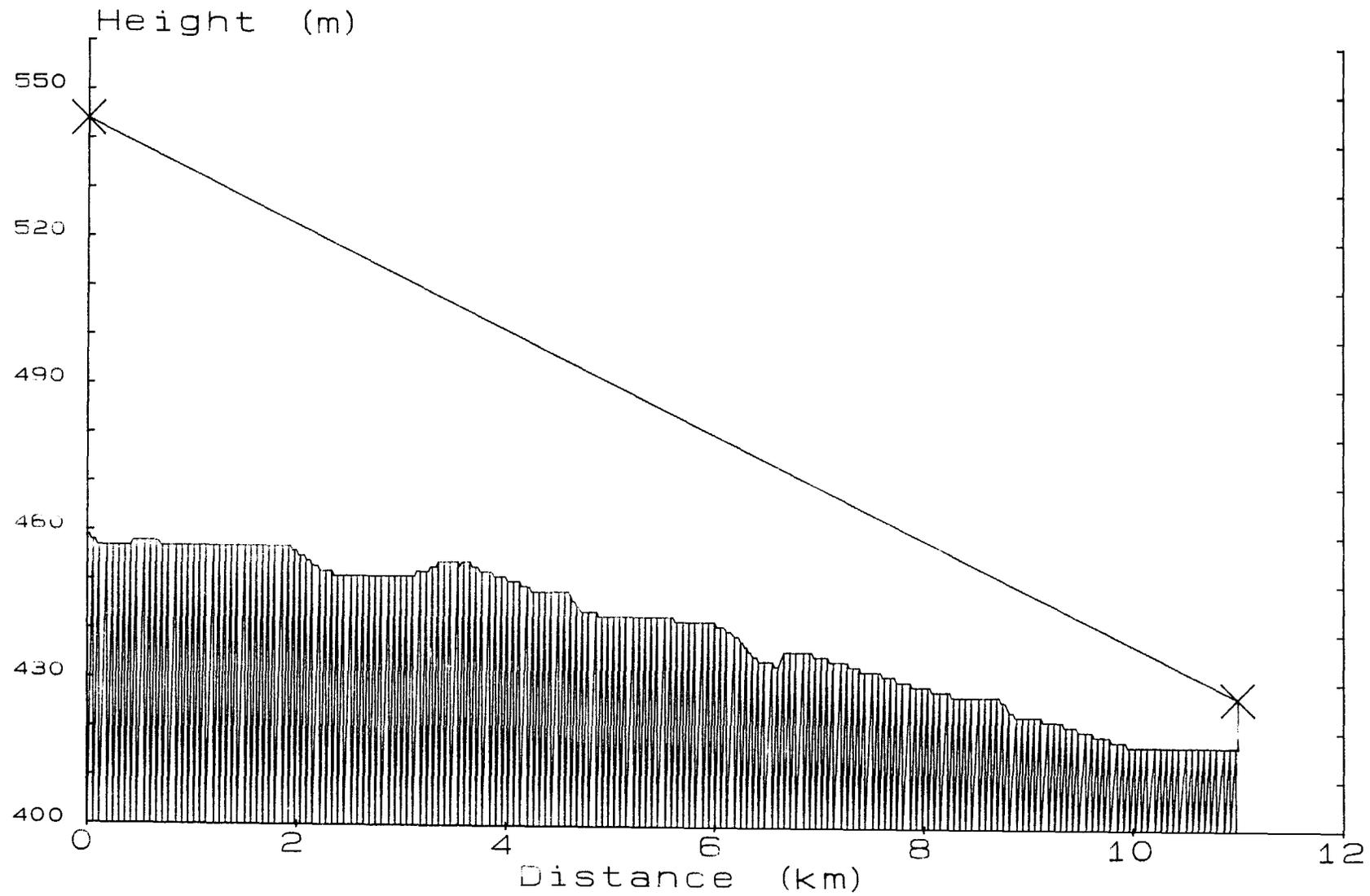
LATITUDE: 44° 13' 46"  
LONGITUDE: 95° 44' 36"

CHNL	Call	City	Class	Calculated Km.	Required Km.	Clear- ance	Bearing °
232							
284		FASD Sioux Falls	C	121.22	96	25.22	243.11
284	KKLSFM	FMSD Sioux Falls	C	121.22	96	25.22	243.11
285	KXAX	FMMN St. James	A	88.76	89	-0.24	102.34
285		FAIA Spencer	A	130.59	89	41.59	155.73
285		FAMN St. James	A	88.76	89	-0.24	102.34
285	KJJG	FMIA Spencer	A	130.59	89	41.59	155.73
286							
287		FAIA Sheldon	C2	116.66	117	-0.34	184.94
287	KIWAFM	FMIA Sheldon	C2	116.66	117	-0.34	184.97
288	KMGM	FMMN Montevideo	A	70.28	42	28.28	7.33
288		FAMN Montevideo	A	70.28	42	28.28	7.33
289	KLPR	FMMN Springfield	A	50.96	42	8.96	88.84



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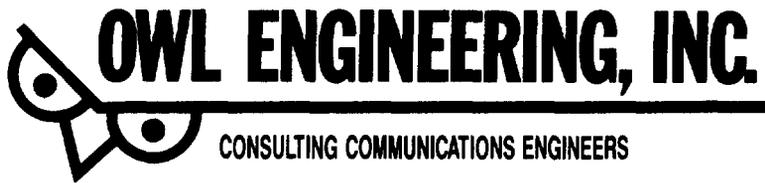


Profile Study for Tracy, MN

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(612) 631-1338

Engineering Exhibit E-3



**OWL ENGINEERING, INC.**

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**ENGINEERING STATEMENT ON BEHALF OF  
PLUM CREEK BROADCASTING  
IN SUPPORT OF A PETITION TO AMEND  
THE FM TABLE OF ALLOTMENTS  
CHANNEL 286C3 TO TRACY, MINNESOTA**

December 3, 1992

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