

BEFORE THE

SEP - 9 1993

Federal Communications Commission  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

WASHINGTON, D. C. 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b) ) File No. RM- \_\_\_\_\_  
Table of Allotments )  
FM Broadcast Stations )  
(Pequot Lakes, Minnesota) )

To: The Chief, Allocations Branch

PETITION FOR RULEMAKING

Minnesota Christian Broadcasters, Inc. ("MCBI"), licensee of FM Broadcast Station KTIG, Pequot Lakes, Minnesota, hereby requests that the Commission institute a rulemaking proceeding for the purpose of amending Section 73.202(b) of the Commission's rules as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Pequot Lakes, MN	274C2	261A, 274C2

MCBI recently requested, and the Commission granted, in MM Docket No. 92-102 (RM-7969) the upgrade of the KTIG allocation at Pequot Lakes from Channel 261A to 274C2. The change became effective on November 5, 1992. In upgrading the allocation the Commission directed MCBI to file a modification application for a construction permit for the new facility on Channel 274C2. MCBI filed such application and on May 25, 1993, the Commission granted it a construction permit for operation on Channel 274C2 (File No. BPH-921215IG). MCBI is diligently pursuing construction of the new facility which

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will be located at a different transmitter site than the present operation of Station KTIG on Channel 261A.

Since the new Channel 274C2 facility will be located at a different site, MCBI has determined that its existing facility on Channel 261A could provide a second service to Pequot Lakes, Minnesota. Both channels can be allocated to Pequot Lakes.<sup>1/</sup> Accordingly, MCBI seeks the addition of Channel 261A to Pequot Lakes so that it, or another permittee, can provide a second service to the community on a frequency that has become recognized by area listeners as a local channel.

As shown in the attached engineering statement (Exhibit No. 1), the proposed addition to the Table of Allocations may be made in full compliance with the Commission's separation requirements.

MCBI hereby states that upon adoption of the proposed change it will expeditiously apply for operation of Channel 261A and, upon grant, it will promptly initiate operation on Channel 261A.<sup>2/</sup>

WHEREFORE, It is requested that the Commission institute a rulemaking proceeding for the purpose of amending the Table

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<sup>1/</sup> The upgrade of KTIG on Channel 274C2 was on a nonadjacent channel. As such, Channels 261A and 274C2 can both operate at Pequot Lakes.

<sup>2/</sup> As noted above, MCBI has an existing facility than can quickly commence operation on Channel 261A.

of Allotments as described above to add Channel 261A to Pequot  
Lakes, Minnesota.

MINNESOTA CHRISTIAN BROADCASTERS, INC.

By   
Dennis F. Begley

Its Counsel

Reddy, Begley & Martin  
1001 22nd Street, N.W.  
Suite 350  
Washington, D.C. 20037

September 9, 1993

Exhibit No. 1

Engineering Report

014

## **ENGINEERING REPORT**

**In Support of a Petition**  
**to Add Channel 261(A)**  
**At Pequot Lakes, Minnesota**

**August, 1993**

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**E. HAROLD MUNN, JR. & ASSOCIATES, INC.**  
Broadcast Engineering Consultants  
Coldwater, MI 49036

**CERTIFICATION OF CONSULTANT**

The firm of E. Harold Munn, Jr. & Associates, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data submitted in this report.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of those data errors or omissions.

The report has been prepared by or under the direction of the undersigned, whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

E. Harold Munn, Jr. & Associates, Inc.

August 25, 1993

by

  
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Wayne S. Reese, President

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E. HAROLD MUNN, JR. & ASSOCIATES, INC.  
Broadcast Engineering Consultants  
Coldwater, MI 49036

**ENGINEERING STATEMENT**

**In Support of a Petition To Amend §73.202(b)**

The firm of E. Harold Munn, Jr. & Associates, Inc., was retained to prepare this Engineering Statement in support of a petition to amend 47 C.F.R. Section 73.202(b), the FM Table of Allotments.

It is proposed to amend the Table to add Channel 261(A), 100.1 MHz for use at Pequot Lakes, Minnesota. This site meets the spacings of §73.207(b)(1)(2). A substantial open area exists where a transmitter site may be located.

Data contained in this report is responsive to the requirements of the Rules, as amended.

Figure 1 is a pertinent portion of the computer study which demonstrates that, at the reference point listed, and for the class of station proposed, all the required separations are fully met for the allotment of Channel 261(A).

The reference point considered for the study is NL 46°36'06"; WL 94°18'55". This is a point proximate to the city from which the 3.16 mV/m (70 dBu) contour of the proposed facility would encompass the entire community.

It is requested that 47 C.F.R. §73.202(b) be amended as follows.

<u>CITY, STATE</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Pequot Lakes, Minnesota	274C2	261A, 274C2

**E. HAROLD MUNN, JR. & ASSOCIATES, INC.**

**Broadcast Engineering Corporation**  
**Pequot Lakes, MI 49036**

FIGURE 1

E. HAROLD MUNN JR & ASSOCIATES  
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PROPOSED RULEMAKING OF CHANNEL 261A  
PEQUOT LAKES, MINNESOTA

REFERENCE		CLASS A	DISPLAY DATES
46 36 06 N		Current rules spacings	DATA 07-28-93
94 18 55 W		CHANNEL 261 -100.1 MHz	SEARCH 08-23-93

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WUSZ LI CN	260C1 47 22 52	Virginia 92 57 18	MN 100.000 kW	50.1 173M	134.97 83.9	133.0 82.7	1.97 <
		Virginia Broadcasting Co.			BLH880418KB		
WBOBFM LI CY	262C1 45 20 12	Minneapolis 93 23 28	MN 100.000 kW	153.0 276M	157.80 98.1	133.0 82.7	24.80
		Radio 100 Limited Partnership			BLED900705KC		
KXDL.C CP CN	259A 46 03 15	Browerville 94 50 50	MN 3.000 kW	213.9 100M	73.36 45.6	31.0 19.3	42.36
		Prairie Broadcasting Company,			BPH860813MU		
KIKVFM LI CN	264C1 45 41 03	Alexandria 95 08 14	MN 100.000 kW	211.9 244M	120.14 74.7	75.0 46.6	45.14
		Lusk Broadcasting, Inc.			BLH7358		