

BEFORE THE

Federal Communications Commission

WASHINGTON, D. C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations.)
(Pequot Lakes, Minnesota))

MM Docket No. 93-278
RM-8344

TO: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COMMENTS OF MINNESOTA CHRISTIAN BROADCASTERS, INC.

Minnesota Christian Broadcasters, Inc. ("Minnesota Christian"), hereby files its comments to the Commission's Notice of Proposed Rule Making released in the above-styled proceeding on November 17, 1993 (DA-93-1302).

Minnesota Christian hereby incorporates by reference the Petition for Rulemaking filed with the Commission on its behalf on September 9, 1993. Said petition seeks the allocation of Channel 261A to Pequot Lakes, Minnesota.

In response to Footnote 2 of the Commission's Order, Minnesota Christian is eligible to acquire a second FM station at Pequot Lakes. Minnesota Christian is presently the licensee of Station KTIG. While KTIG presently operates on Channel 261A, its license has been modified to Channel 274C2 and it has been granted a construction permit (BPH-921215IG) for construction of a new facility on Channel 274C2. As established in the attached engineering statement of E. Harold Munn, Jr. & Associates, the composite service area for Station KTIG and the proposed station on

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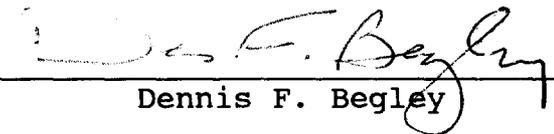
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Channel 261A would be served by a total of 4 AM stations and 9 FM stations. Accordingly, since Minnesota Christian would own two FM stations and these stations represent less than 50% of the FM stations in the market, it would be eligible to acquire the proposed FM station pursuant to the provisions of Section 73.3555(a)(1)(i) of the Commission's Rules.

Minnesota Christian hereby reiterates its intention to file an application for a station on Channel 261A and, should its application be granted, to expeditiously construct the new facilities.

In light of the above, it is requested that the Commission expeditiously modify the Table of Allotments to allocate 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

January 10, 1994

Exhibit No. 1

Engineering Statement of
E. Harold Munn, Jr. & Associates

A MULTIPLE SERVICES STUDY

**Channel 261A - Pequot Lakes, MN
KTIG-CP (FM) - Pequot Lakes, MN**

January 1994

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

ENGINEERING STATEMENT

This firm was retained to study the number of principal community radio contours available from stations authorized for commercial service within the radio market defined by the principal community contours of the facilities specified in the Construction Permit, File No. BPH-921215IG, for KTIG (FM), Pequot Lakes, MN, and a maximum Class A FM Broadcast facility located at the reference coordinates sited in a petition to add Channel 261A to Pequot Lakes, MN. This second facility has been identified in this report as "RM-261A." Since the petitioner seeking to add Channel 261A is also the licensee of KTIG, the Commission has requested this report.

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM and FM stations. The listed facilities served as the basis for the computation of the respective principal community contours as defined in §73.3555 (a)(3)(i). The accuracy of the results of this study are understood to be limited to the accuracies of these databases. The FCC databases give no indication of licensed facilities which may be inoperative, construction permit facilities which may now be operating under program test authority (but have not yet been issued a license), facilities which may have been licensed since the last monthly update, or non-commercial stations operating either in the AM band or within the commercial portion of the FM band. Therefore, it is possible that some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known non-commercially licensed stations, as well as application and construction permit facilities, have been eliminated from consideration in this study.

The only exceptions to the above guidelines in the present study are the facilities which define the radio market. Since no new facility has obviously been authorized for the proposed channel, a maximum Class A facility with 6.0 kW ERP and a HAAT of 100 meters has been assumed for RM-261A. The Construction Permit facilities for KTIG have been identified as "KTIG-CP" to clearly distinguish them from those listed as the licensed KTIG facilities.

For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBu) contour based on the use of eight cardinal bearings as provided in §73.313 of the Rules.

The radio market has been defined, in accordance with §73.3555 (a)(3)(ii) of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of KTIG-CP (FM) and RM-261A (FM). Figure 1 shows only these contours on a Minnesota map indicating the boundaries of the four counties (Hubbard, Cass, Wadena, and Crow Wing) contained in whole or in part within the defined market area. These contours are also shown in both Figure 3 and Figure 4 of this report along with the other principal community contours entering the market. This defined market area has been outlined with a ring of shading on both of these maps.

In addition to the two stations defining the market area, the principal community contours of the four (4) AM stations entering the market are shown in Figure 3 and the principal community contours of the seven (7) other FM stations entering the market are shown in Figure 4. Including the two (2) stations which define the market area, there is a total of thirteen (13) aural services in this market. Figure 2 lists the facilities of the individual stations used in this report.

CERTIFICATION

I hereby certify, subject to penalties for perjury, that the contents of this Engineering Statement are true and accurate to the best of my knowledge and belief.

January 4, 1994

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

P.O. Box 220
Coldwater, MI 49036

By


Wayne S. Reese, President

(517) 278-7339

FIGURE 1

MAP DEFINING RADIO MARKET

RM-261A (FM) - 3.16 mV/m

KTIG-CP (FM) - 3.16 mV/m

10 0 10 20 30 40 Miles

10 0 10 20 30 40 50 Kilometers

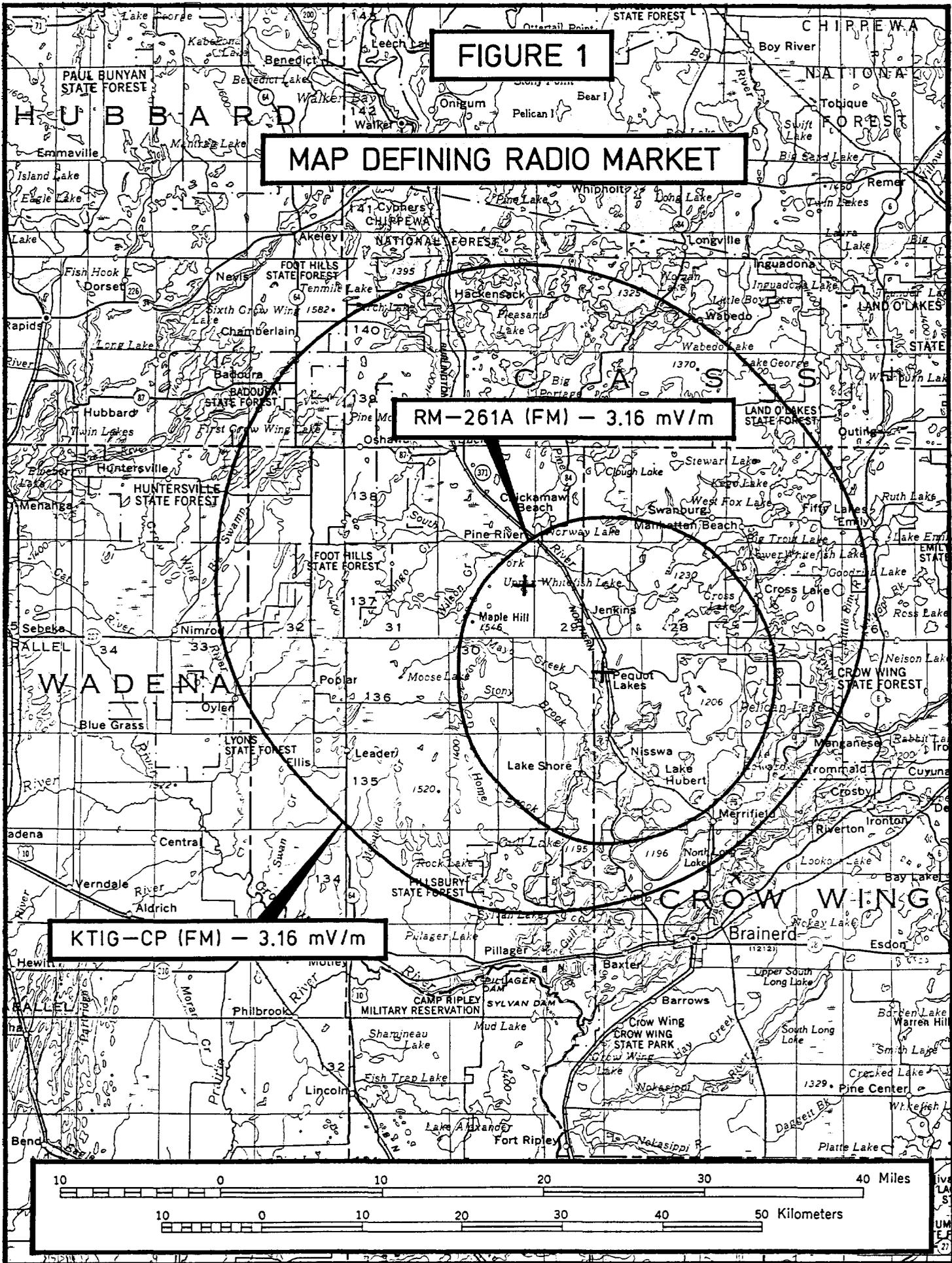


FIGURE 2

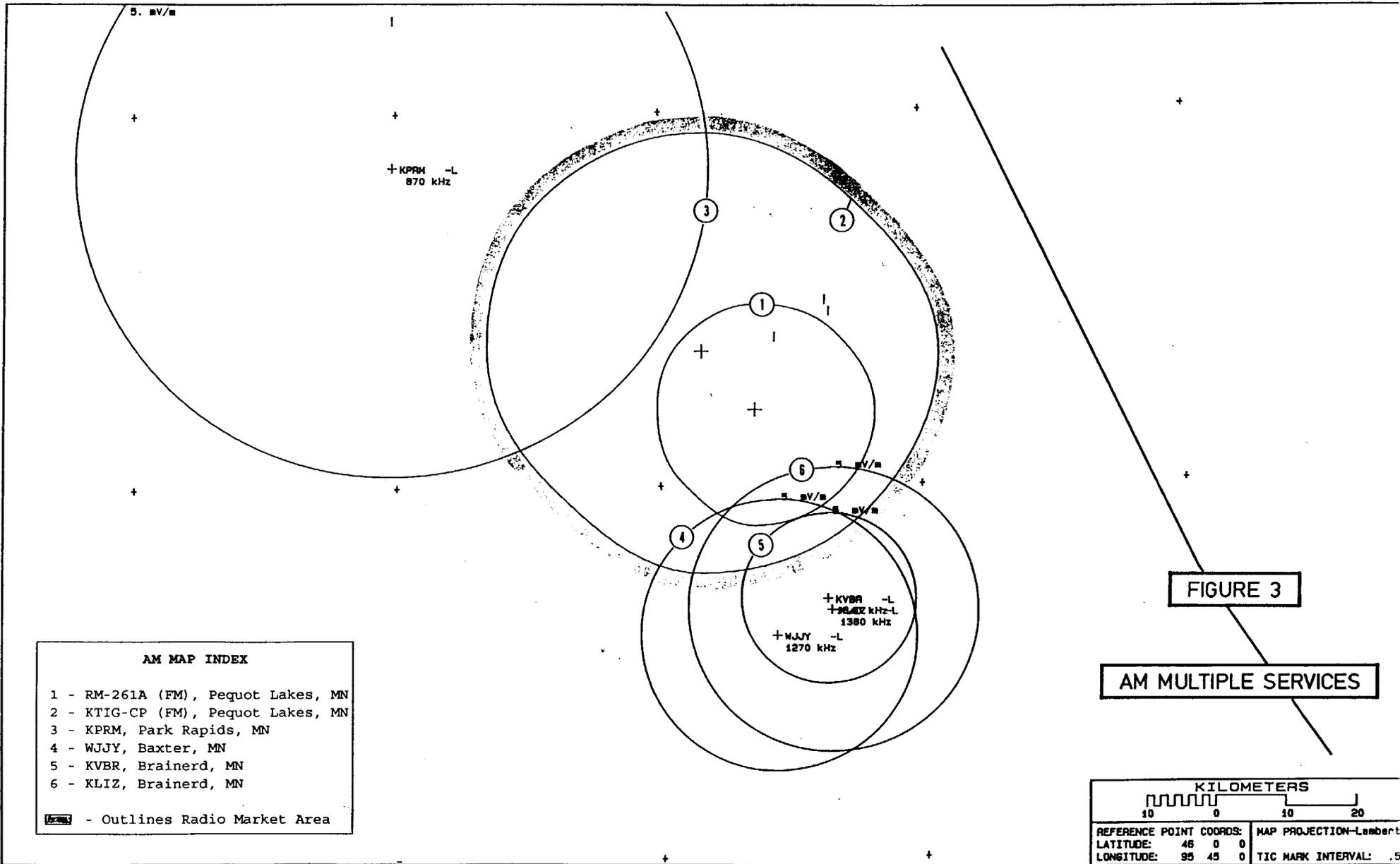
FACILITIES SHOWN IN MULTIPLE SERVICES STUDY

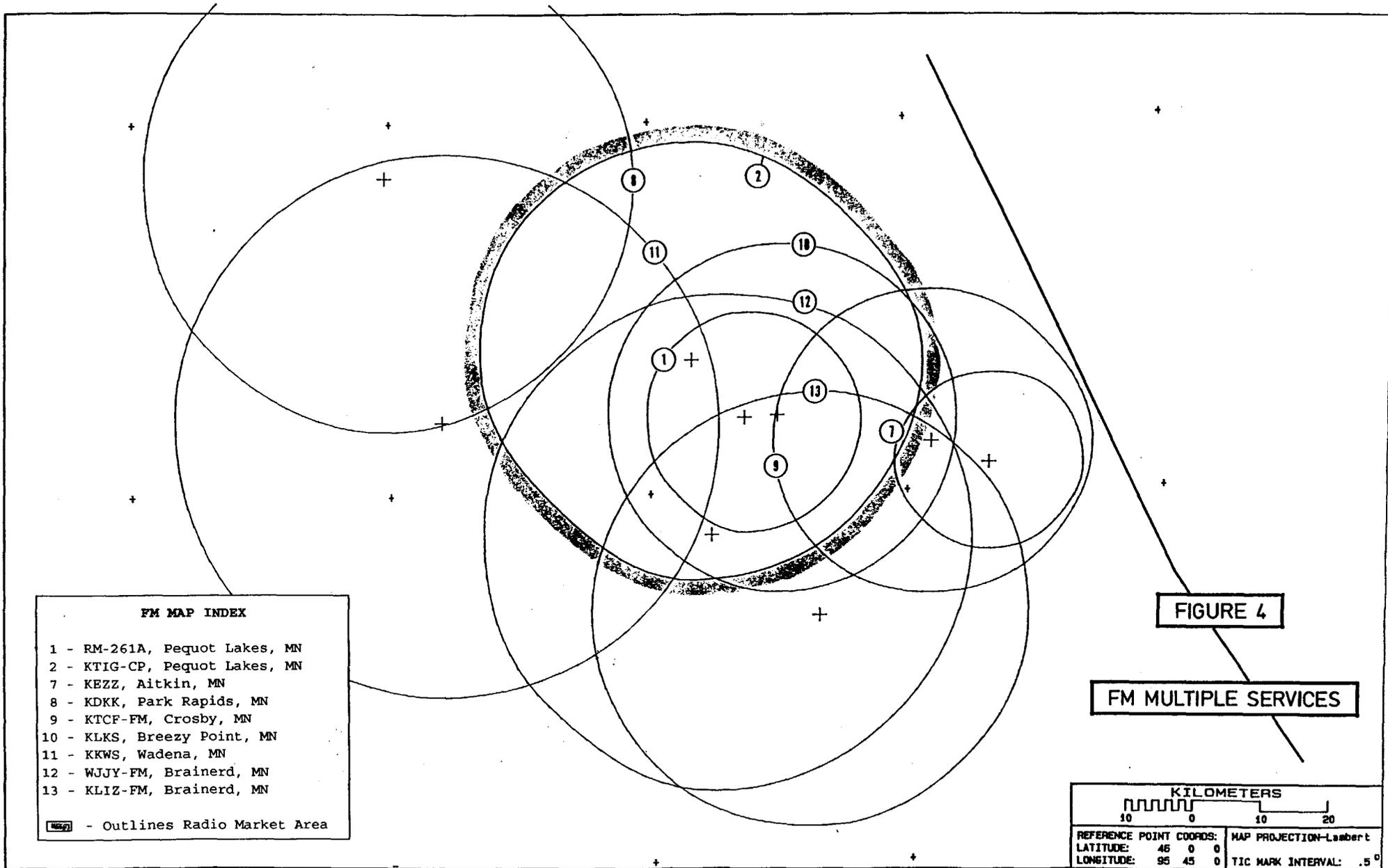
AM STATIONS

<u>Station Number</u>	<u>Call Sign</u>	<u>Frequency (KHz)</u>	<u>Power (kW)</u>	<u>Pattern (DA/NDA)</u>	<u>North Latitude</u>	<u>West Longitude</u>	<u>City</u>	<u>State</u>
1	RM-261A (FM)				46-36-06	94-18-55	Pequot Lakes	MN
2	KTIG-CP (FM)				46-40-48	94-25-02	Pequot Lakes	MN
3	KPRM	870	25	NDA	46-55-42	95-00-22	Park Rapids	MN
4	WJJY	1270	5.0	NDA	46-17-55	94-16-42	Baxter	MN
5	KVBR	1340	1.0	NDA	46-20-51	94-10-52	Brainerd	MN
6	KLIZ	1380	5.0	NDA	46-19-56	94-10-26	Brainerd	MN

FM STATIONS

<u>Station Number</u>	<u>Call Sign</u>	<u>Frequency (MHz)</u>	<u>ERP (kW)</u>	<u>HAAT (meters)</u>	<u>North Latitude</u>	<u>West Longitude</u>	<u>City</u>	<u>State</u>
1	RM-261A	100.1	6.0	100	46-36-06	94-18-55	Pequot Lakes	MN
2	KTIG-CP	102.7	40	165	46-40-48	94-25-02	Pequot Lakes	MN
7	KEZZ	94.3	3.0	100	46-32-07	93-50-26	Aitkin	MN
8	KDKK	97.5	100	134	46-55-42	95-00-22	Park Rapids	MN
9	KTCF-FM	101.5	25.0	100	46-33-51	93-57-03	Crosby	MN
10	KLKS	104.3	19.0	150	46-36-13	94-15-04	Breezy Point	MN
11	KKWS	105.9	100	171	46-36-00	94-54-03	Wadena	MN
12	WJJY-FM	106.7	100	137	46-26-36	94-22-58	Brainerd	MN
13	KLIZ-FM	107.5	100	107	46-19-56	94-10-26	Brainerd	MN

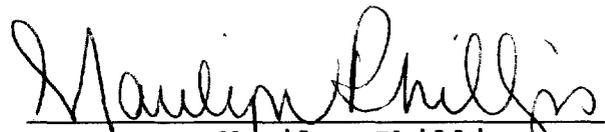




CERTIFICATE OF SERVICE

I, Marilyn Phillips, hereby certify that on this 10th day of January, 1994 the foregoing **COMMENTS OF MINNESOTA CHRISTIAN BROADCASTERS, INC.** was served, by hand delivery to the following:

Ms. Kathleen Scheuerle
Federal Communications Commission
2025 M Street, N.W., Room 8314
Washington, D.C. 20554


Marilyn Phillips
Marilyn Phillips