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LAW OFFICES
HALEY BADER & POTTS P.L.C.

4350 NORTH FAIRFAX DR., SUITE 900

ARLINGTON, VIRGINIA 22203-1633

TELEPHONE (703) 841-0606

FAX (703) 841-2345

E-MAIL: haleybp@haleybp.com

THEODORE D. KRAMER

ADMITTED IN VA AND DC

E-mail: tkramer@haleybp.com

Our File No.

1199-103-63

October 28, 1998

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Notice of Proposed Rulemaking
RM-9290, MM Docket No. 98-159
Bigfork, Montana

Dear Ms. Salas:

On behalf of Alpine Broadcasting Limited Partnership, permittee of Station KSIL(FM), Wallace, Idaho, submitted herewith is the original of the Engineering Statement, a facsimile copy of which was attached as Exhibit 11 to Alpine's Comments in the referenced proceeding.

If there are any questions in regard to this matter, kindly communicate directly with this office.

Very truly yours,


Theodore D. Kramer

TDK:dh
Enclosure

cc: Robert Lewis Thompson, Esq. (w/encl.)

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List ABCDE



Broadcast Engineering Services

415 Emerald Forest Lane

Bonny Doon, California 95060

(831)420-1571 (831)457-8099 (FAX) dmsml@well.com

Donald E. Mussell Jr. NCE
Consulting Engineer

ENGINEERING STATEMENT

in support of Alpine Broadcasting, Ltd.

Allocation of KSIL Wallace, Idaho to Big Fork, Montana

As shown in Figure 1, the total overlap of the existing (but unbuilt) 60 dbu contour and the proposed 60 dbu contour of KSIL falls entirely within Sanders County, Montana. The overlap area contains 3,270 Persons, and encompasses 3,280 Sq. kilometers. There are no radio facilities located in Sanders County, Montana within the overlap area.

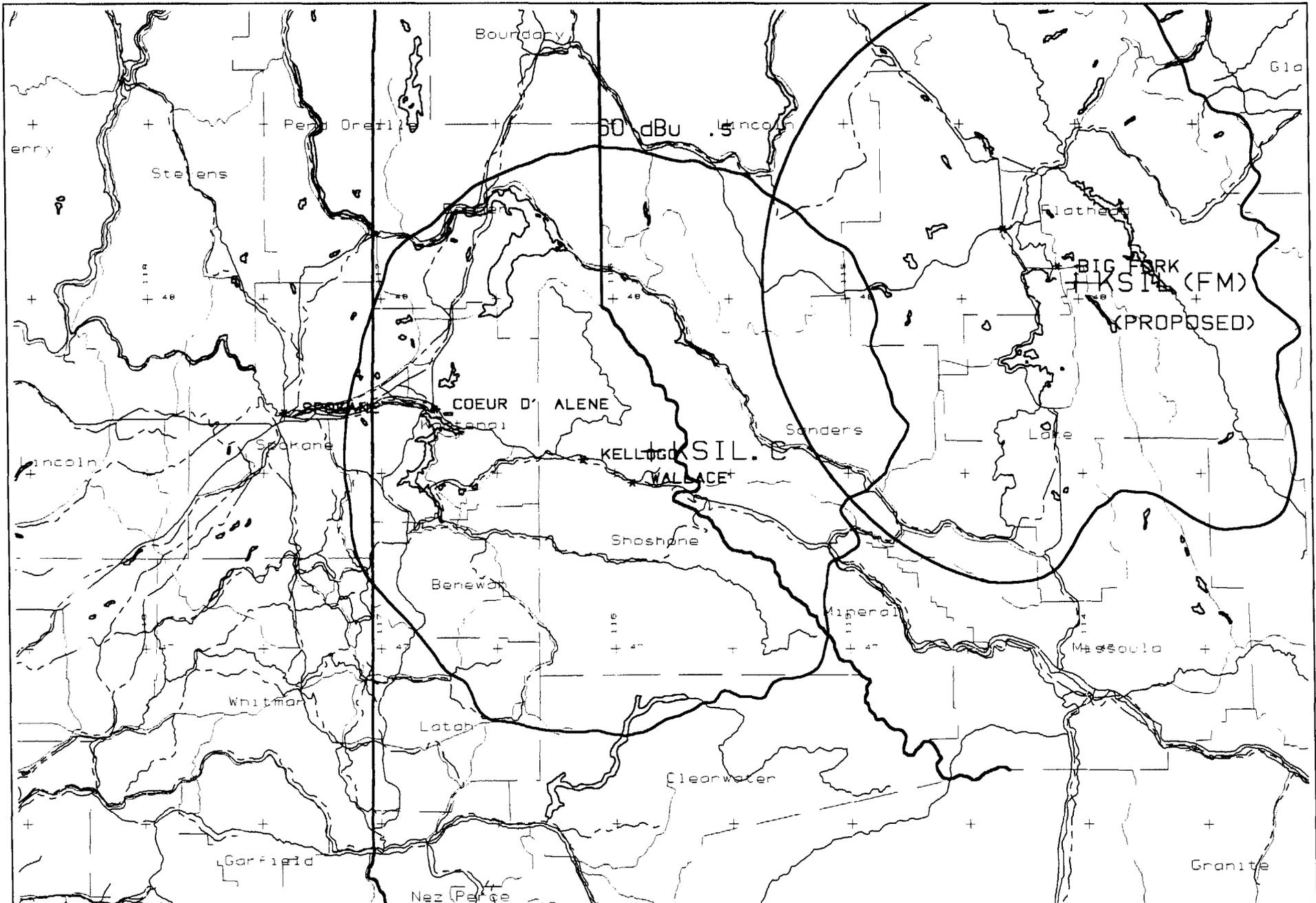
The total population that would be served by the (unbuilt) KSIL(FM) 60 dbu would include 137,068 persons, and a total geographic area of 26,219 Sq. kilometers. By allocating KSIL(FM) to Big Fork, Montana, a total of 133,798 persons within a geographic Area encompassing 22,939 Sq. kilometers would "lose" service, although in reality, there would be no "loss", because KSIL(FM) has not commenced operation.

By allocating KSIL(FM) to Big Fork, Montana, the total gain in population served would be 83,067 persons within a geographic Area encompassing 25,050 Sq. kilometers. Subtracting the overlap population and geographic area of the two proposals, the result is a gain of 79,797 persons within a geographic area encompassing 21,770 Sq. kilometers.

In Figure 2, existing radio facilities that overlap both the unbuilt and proposed KSIL(FM) facilities are listed. There are a total of 20 operating radio stations within the 60 dbu contour of the unbuilt KSIL(FM) facility. Within the proposed 60 dbu contour of the KSIL(FM) Big Fork facility, there are 10 operating radio stations. There will still be two existing aural services in Wallace, Idaho (KQWK(FM) and KWAL(AM)), should Ch. 264C be allotted to Big Fork, Montana.

Submitted this 26th day of October, 1998

Donald E. Mussell Jr, NCE



ALLOCATE KSEL (FM) WALLACE, ID TO BIG FORK, MT
 FIGURE 1 - 60 DBU CONTOURS

ALPINE BROADCASTING, LTD.
 DON MUSSELL CE - 10/98

FIGURE 2
COMMERCIAL STATIONS WITHIN THE LOSS AREA OF KSIL(FM) WALLACE, IDAHO (60 DBU)

FM:

KZZU Spokane, WA
KDRK Spokane, WA
KEZE Spokane, WA
KISC Spokane, WA
KZZY Spokane, WA
KXLY Spokane, WA
KNJY Spokane, WA
KEEH Spokane, WA
KAEP Spokane, WA
KHTQ Hayden, ID
KCDA Cour d' Alene, ID

AM:

KVNI Cour d' Alene, ID
KWAL Wallace, ID
KAQQ Spokane, WA
KJRB Spokane, WA
KXLY(AM) Spokane, WA
KTRW Spokane, WA
KSBN Spokane, WA
KUDY Spokane, WA
KGA Spokane, WA

COMMERCIAL STATIONS WITHIN THE GAIN AREA OF KSIL(FM) PROPOSED BIG FORK (60 DBU)

FM:

KQRK Ronan, MT
KDBR Kalispel, MT
KKMT Columbia Falls, MT
KALS, Kalispel, MT
KBBZ Kalispel, MT
KOFI Kalispel, MT

AM:

KGEZ Kalispel, MT
KOFI(AM) Kalispel, MT
KERR Polsen, MT
KJJZ Whitefish, MT

**AFFIDAVIT AND QUALIFICATIONS OF
DONALD E. MUSSELL JR.**

State of California)
Bonny Doon)
County of Santa Cruz)

Donald E. Mussell Jr. affirms that he is a consulting radio and electronics engineer; that he is Certified as a Broadcast Engineer, Class 1, by the National Association of Radio and Telecommunications Engineers, Inc.; That he is recognized as a Broadcast Technologist by the Society of Broadcast Engineers; That he held a First Class Radiotelephone License from 1975 until 1985, when it was replaced by a lifetime General Class Radiotelephone license (PG-12-20588), issued by the Federal Communications Commission in January of 1985; that the foregoing report was prepared by him or under his direction; and that the statements contained therein are true to his own personal knowledge except those stated to be on information and belief, and as to those statements, he verily believes them to be true.



Donald E. Mussell Jr. NCE
October 26, 1998