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August 15, 2000

Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals/445 Twelfth Street, S.W.
Washington, D.C. 20554

RE: Petition for Rulemaking

Dear Ms. Salas:

There is transmitted herewith on behalf of Bethesda Christian Broadcasting, Inc., the licensee of Station KLMP(FM), Rapid City, South Dakota, an original and four copies of a *Petition for Rulemaking* to institute a rulemaking to amend §73.202(b), the FM Table of Allotments, by substituting Channel 250C for Channel 250C-1 in Rapid City, South Dakota and by substituting Channel 282A for Channel 249A in Gillette, Wyoming.

An extra copy of this transmittal letter is enclosed, as well as a pre-addressed, stamped envelope. Please confirm your receipt of the filing of this *Petition for Rulemaking* by date stamping the extra copy of this transmittal letter and returning it to the undersigned counsel.

Should additional information be desired concerning this *Petition for Rulemaking* please contact the undersigned counsel.

Respectfully submitted,

BETHESDA CHRISTIAN BROADCASTING INC.


J. Dominic Monahan, Its Counsel

JDM/nlk

Enclosures

cc: Mark Pluimer (w/enclosure)
Gillette FM LLC (w/enclosure)
Kevin Clements (w/enclosure)
Ron Franscell (w/enclosure)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
The Amendment of §73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Rapid City, South Dakota and)
Gillette, Wyoming))
)

File No. _____

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

PETITION FOR RULEMAKING

Bethesda Christian Broadcasting, Inc. (hereinafter "Bethesda Christian"), by its counsel, hereby respectfully requests that the Commission modify its FM broadcast station table of allotments in §73.202 of the Commission's rules and regulations as follows:

<u>Community</u>	<u>Present Allocation</u>	<u>Proposed Allocation</u>
Rapid City, South Dakota	250C-1	250C
Gillette, Wyoming	249A	282A

In support of this request, the following is submitted for consideration by the Commission.

Bethesda Christian is the licensee of Station KLMP(FM), Rapid City, South Dakota and operates on FM Channel 250C-1. Bethesda Christian seeks to expand its service area

in order to provide greater and more reliable broadcast service for the residents of Rapid City as well as the surrounding Black Hills area by upgrading to 100 Kw ERP utilizing 579 meters height above average terrain. However, in order to effect the upgrade, FM Channel 249A, currently allocated to Gillette, Wyoming, will have to be modified to Channel 282A.

Although Channel 249A is vacant at the present time, there are three mutually exclusive applicants seeking to utilize that frequency. One of the applicants has a pending application and an amendment pending to change its proposed transmitter site.¹ However, all the transmitter site locations proposed utilizing FM channel 282A will be provided appropriate spacing protection. Listed below are the applicants and their proposed transmitter sites:

<u>Applicant</u>	<u>Transmitter Site</u>
Gillette FM LLC	North Latitude 44° 18' 10" West Longitude 105° 27' 00"
Kevin Clements	North Latitude 44° 14' 35" West Longitude 105° 32' 19"
Ron Franscell	North Latitude 44° 14' 53" West Longitude 105° 29' 40"

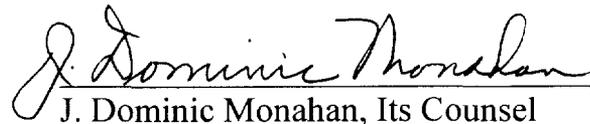
As demonstrated in the attached engineering, the use of Channel 282A in substitution for Channel 249A will work at all of the above-referenced coordinates while eliminating the short spacing to Bethesda Christian's proposed use of Channel 250C at its present site.

¹Kevin Clements' original proposal specified a transmitter site at North Latitude 44° 18' 10" and West Longitude 105° 27' 00".

In the event the Commission adopts this proposal, Bethesda Christian will immediately file the necessary application to implement the upgrade of Station KLMP in conformity with the new allocation and will place the station into operation with the improved facilities. Accordingly, Bethesda Christian respectfully requests that the Commission issue a *Notice of Proposed Rulemaking* consistent with this Petition.

Respectfully submitted,

BETHESDA CHRISTIAN BROADCASTING INC.



J. Dominic Monahan, Its Counsel

Dated: August 15, 2000

ENGINEERING REPORT
In Support Of A
Petition for Rulemaking
To Make Changes To
47 C.F.R. §73.202(b)

Channel 250C for Channel 250C1 – Rapid City, SD
Channel 282A for Channel 249A – Gillette, WY

August 2000

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Broadcast Engineering Consultants
Coldwater, MI 49036

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CERTIFICATION OF ENGINEERS

The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming 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 such data errors or omissions.

The report has been prepared by properly trained electronics specialists 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.

August 9, 2000

MUNN-REESE, INC.

By Wayne S. Reese
Wayne S. Reese, President

By Justin W. Asher
Justin W. Asher, Project Engineer

100 Airport Drive, PO Box 220
Coldwater, Michigan 49036

Telephone: 517-278-7339

MUNN-REESE, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

DISCUSSION

This firm has been retained to prepare this Petition for Rulemaking for Bethesda Christian Broadcasting, Inc. (Bethesda) in support of a proposal to upgrade the facilities of KLMP, Rapid City, SD. Bethesda desires to upgrade the licensed operation of KLMP from Class C1 to Class C. To accomplish this, the KLMP transmitter site would be moved to the top of Terry Peak at coordinates NL 44°19'42" by WL 103°50'03", which becomes the reference point for this proposal. From this location KLMP will operate with 100 kW effective radiated power (ERP), and increase its height above average terrain (HAAT) from the present 119 meters to 579 meters, nearly full Class C facilities.

Figure 1 is a tabulation of the allocation spacings from the proposed reference point with the changes proposed below to eliminate current short-spacings. *Figure 2* is a portion of a topographical map showing the location of the reference point on Terry Peak. There are several broadcast facilities presently operating from the location. Therefore, power is available to operate KLMP at this location. *Figure 3* is a map demonstrating, that from the proposed reference coordinates, KLMP would be able to provide 3.16 mV/m, city grade service, to all of the Rapid City city limits. The facilities shown are for the 100 kW ERP at 579 meters HAAT, Terry Peak operation.

The reference site is presently short-spaced to one existing allocation and one proposed alternate channel in another rulemaking procedure. Channel 249A has been allotted for use at Gillette, WY with the reference coordinates specified at NL 44°17'36" by WL 105°30'06". A filing window was opened on August 11, 1997 for the channel. Three (3) mutually exclusive applicants filed for the facility. One of these applicants has a pending application and a pending amendment to change site locations, however all transmitter site locations are offered protection. Applicant #1, Gillette FM LLC., applied at NL 44°18'10" by WL 105°27'00". Applicant #2, Kevin Clements, filed a 9/11/1997 application also for NL 44°18'10" by WL 105°27'00". Kevin Clements then filed a 2/18/2000 amendment for NL 44°14'35" by WL 105°32'19". Applicant #3, Ron Franscell, applied at NL 44°14'53" by WL 105°29'40". It is proposed to substitute Channel 282A, 104.3 MHz, for Channel 249A at Gillette, WY. This channel, as demonstrated in *Figure 4* through *Figure 4C*, will work at the reference coordinates as well as all three application and amended application sites. Making this change would eliminate the short-spacing to the proposed KLMP Class C facility.

This proposal requests the FM Table of Allotments, found in 47 C.F.R. §73.202(b) to be amended as follows:

<u>Community</u>	<u>Present Allocation</u>	<u>Proposed Allocation</u>
Rapid City, SD	222C, 230C1, <u>250C1</u> , 254C1, 262C1, 281C1, 292C	222C, 230C1, <u>250C</u> , 254C1, 262C1, 281C1, 292C
Gillette, WY	245C1, <u>249A</u> , 264C1	245C1, 264C1, <u>282A</u>

MUNN-REESE, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

FIGURE 1
PROPOSED KLMP UPGRADE

Munn-Reese Inc.
Coldwater - MI 49036

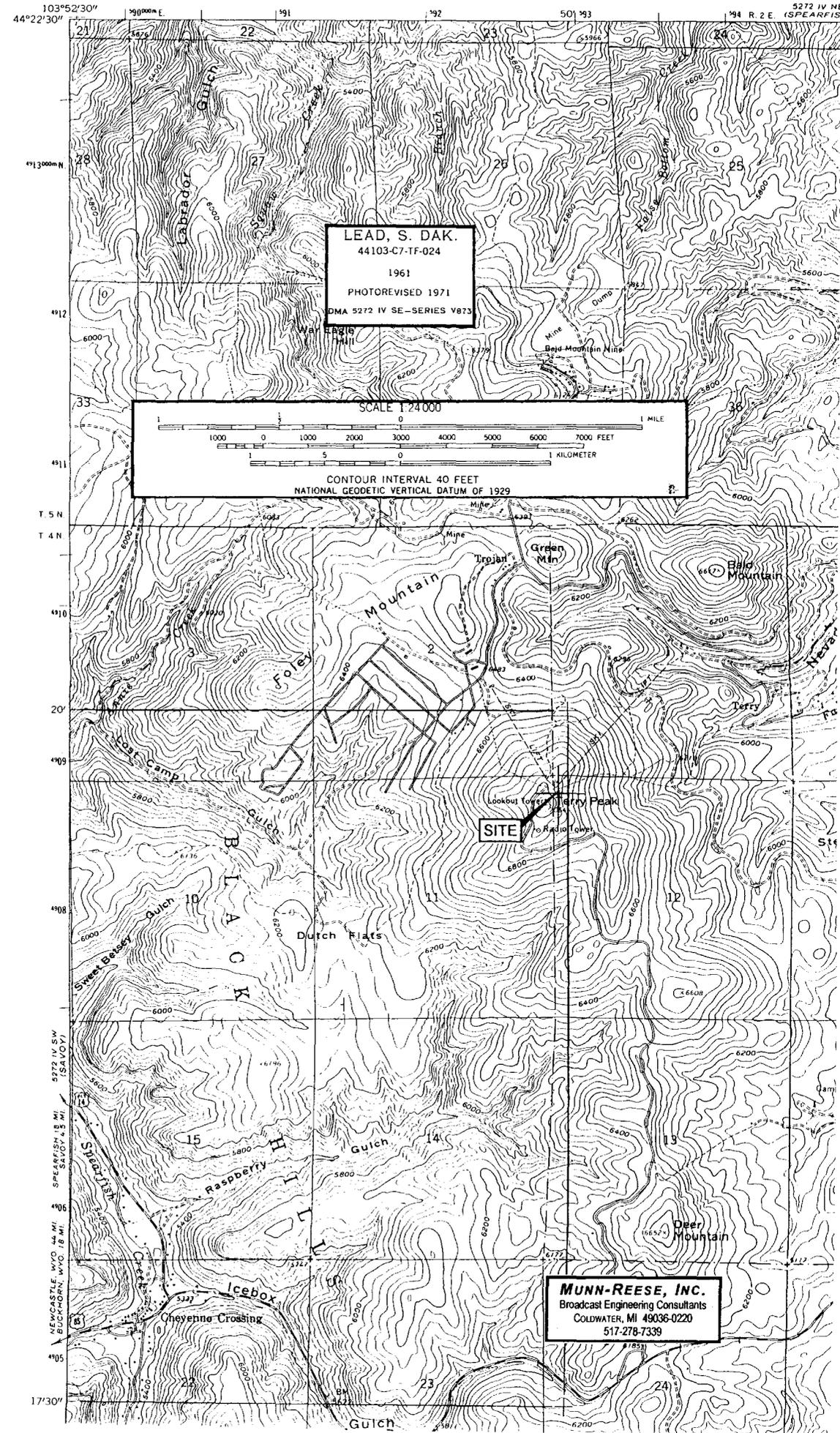
Rapid City, SD

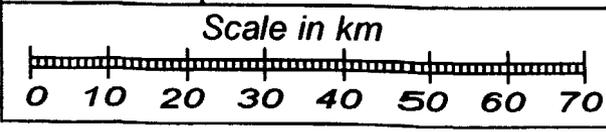
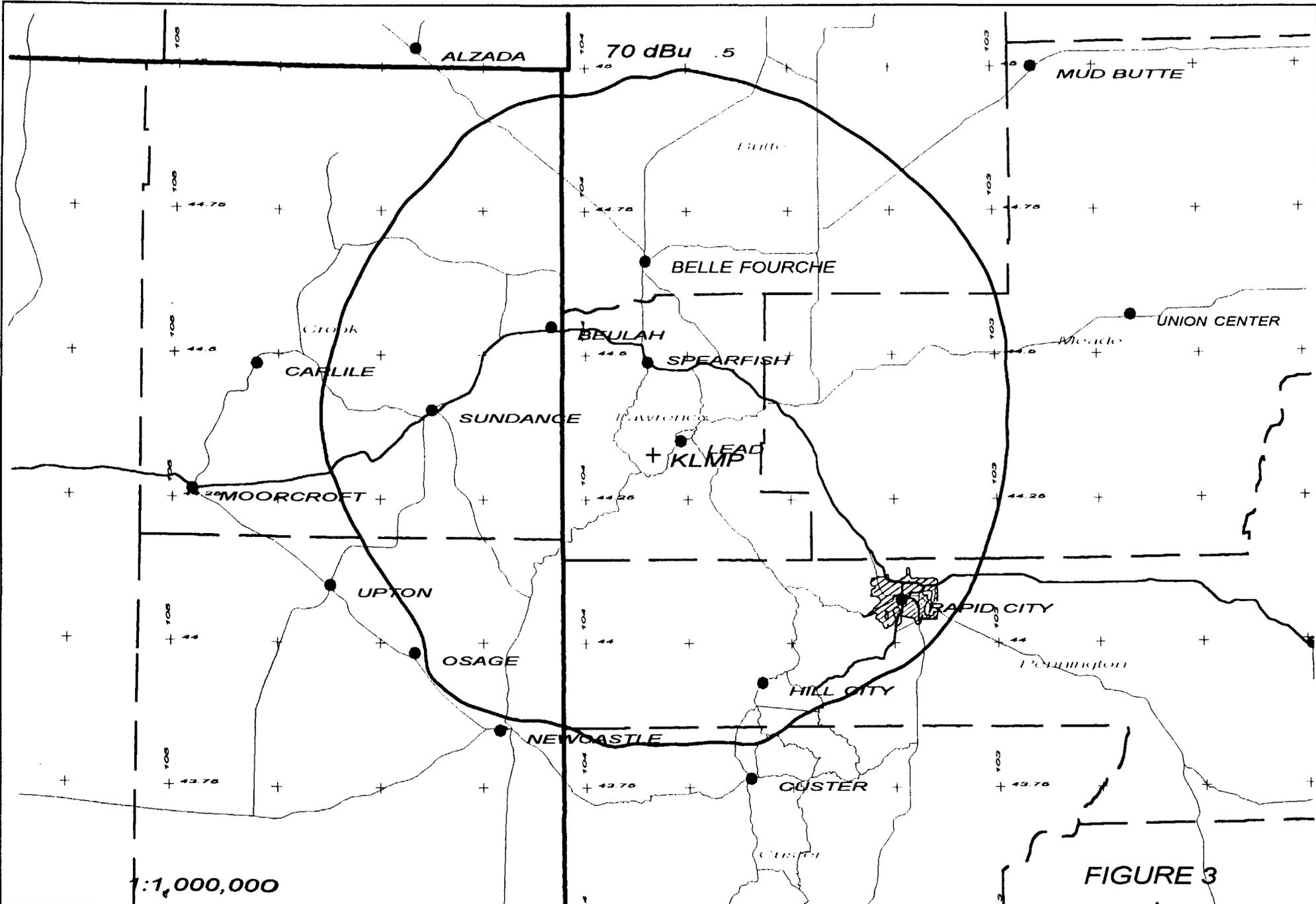
REFERENCE		DISPLAY DATES
44 19 42 N	CLASS = C	DATA 08-05-00
103 50 03 W	Current Spacings	SEARCH 08-09-00
----- Channel 250 - 97.9 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
AD250	AL 250C	Rapid City	SD	0.00	0.0	290.0 -290.00
44 19 42	103 50 03	N	0.000 kW	0 M		
	Bethesda Christian Broadca					
KLMP	LIC 250C1	Rapid City	SD	56.61	123.5	270.0 -213.39
44 02 46	103 14 41	HN	100.000 kW	119 M		
	Bethesda Christian Broadca					
KQSK	LIC 248C1	Chadron	NE	197.20	162.4	105.0 92.20
42 38 06	103 06 12	CN	100.000 kW	256 M		
	Eagle Radio, Inc.					
			BLH6472			BLH19790910AA

FIGURE 2

UNITED STATES
DEPARTMENT OF THE INTERIOR
GEOLOGICAL SURVEY





KLMP 250C 100kW 2290M AMSL
 N. Lat. 44 19 42 W. Lng. 103 50 03

KLMP, Rapid City, SD
 Munn-Reese, Inc. - 08/00

FIGURE 4
ALLOCATION REFERENCE POINT
Gillette, WY

Munn-Reese Inc.
Coldwater - MI 49036

REFERENCE		DISPLAY DATES				
44 17 36 N	CLASS = A	DATA 08-05-00				
105 30 06 W	Current Spacings	SEARCH 08-09-00				
----- Channel 282 - 104.3 MHz -----						
Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
-----	-----	-----	-----	-----	-----	-----
AVAC	VAC 228A	Moorcroft	WY	44.02	93.9	10.0
44 15 54	104 57 06	N	6.000 kW	100 M		34.02
KIQK	LIC 281C1	Rapid City	SD	181.91	98.8	133.0
44 01 19	103 15 33	CN	100.000 kW	164 M		48.91
	Haugo Broadcasting, Inc		BLH19940826KA			

FIGURE 4A
GILLETTE FM LLC. SITE ALLOCATION
Gillette, WY

Munn-Reese Inc.
Coldwater - MI 49036

REFERENCE		DISPLAY DATES
44 18 10 N	CLASS = A	DATA 08-05-00
105 27 00 W	Current Spacings	SEARCH 08-09-00
----- Channel 282 - 104.3 MHz -----		

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.				HAAT		
AVAC	VAC 228A	Moorcroft	WY	40.00	95.9	10.0	30.00
44 15 54	104 57 06	N	6.000 kW		100 M		
KIQK	LIC 281C1	Rapid City	SD	178.00	99.4	133.0	45.00
44 01 19	103 15 33	CN	100.000 kW		164 M		
	Haugo Broadcasting, Inc		BLH19940826KA				

FIGURE 4B
KEVIN CLEMENTS 9/11/1997 SITE ALLOCATION
Gillette, WY

Munn-Reese Inc.
Coldwater - MI 49036

REFERENCE		DISPLAY DATES
44 18 10 N	CLASS = A	DATA 08-05-00
105 27 00 W	Current Spacings	SEARCH 08-09-00
----- Channel 282 - 104.3 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
AVAC	VAC 228A	Moorcroft	WY	40.00	95.9	30.00
44 15 54	104 57 06	N	6.000 kW	100 M	10.0	
KIQK	LIC 281C1	Rapid City	SD	178.00	99.4	45.00
44 01 19	103 15 33	CN	100.000 kW	164 M	133.0	
	Haugo Broadcasting, Inc		BLH19940826KA			

FIGURE 4C
KEVIN CLEMENTS AMENDED 2/18/2000 SITE ALLOCATION
Gillette, WY

Munn-Reese Inc.
Coldwater - MI 49036

REFERENCE		DISPLAY DATES
44 14 35 N	CLASS = A	DATA 08-05-00
105 32 19 W	Current Spacings	SEARCH 08-09-00
----- Channel 282 - 104.3 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
AVAC	VAC 228A	Moorcroft	WY	46.94	86.8	36.94
44 15 54	104 57 06	N	6.000 kW	100 M	10.0	
KIQK	LIC 281C1	Rapid City	SD	184.07	96.9	51.07
44 01 19	103 15 33	CN	100.000 kW	164 M	133.0	
	Haugo Broadcasting, Inc		BLH19940826KA			

FIGURE 4D
RON FRANSCCELL SITE ALLOCATION
Gillette, WY

Munn-Reese Inc.
Coldwater - MI 49036

REFERENCE		DISPLAY DATES
44 14 53 N	CLASS = A	DATA 08-05-00
105 29 40 W	Current Spacings	SEARCH 08-09-00
----- Channel 282 - 104.3 MHz -----		

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.				HAAT		
AVAC	VAC 228A	Moorcroft		43.39	87.3	10.0	33.39
44 15 54	104 57 06	N	6.000 kW		100 M		
KIQK	LIC 281C1	Rapid City		180.64	97.2	133.0	47.64
44 01 19	103 15 33	CN	100.000 kW		164 M		
	Haugo Broadcasting, Inc		BLH19940826KA				

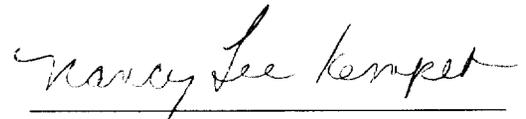
CERTIFICATE OF SERVICE

I, Nancy Lee Kemper, a secretary in the law offices of Luvaas, Cobb, Richards & Fraser, P.C., certify that I have on this 15th day of August, 2000 sent by United States mail, postage prepaid, on behalf of BETHESDA CHRISTIAN BROADCASTING, INC., copies of the foregoing *Petition for Rulemaking* to:

Gillette FM LLC
Post Office Box 3463
Carefree, AZ 85377

Ron Franscell
1001 Clarion Drive
Gillette, WY 82718

Kevin Clements
33 East Cedar
Chicago, IL 60611



Nancy Lee Kemper