

ORIGINAL

Before the
Federal Communications Commission
Washington DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. _____
Table of Allotments)	RM- _____
FM Broadcast Station)	
(Arthur, North Dakota;)	
Hazelton, North Dakota))	

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Vision Media Incorporated ("Vision"), licensee of station KVMI, Channel 280A, Arthur, North Dakota, hereby petitions the Commission to amend Section 73.202(b) of its rules, the FM Table of Allotments, to upgrade Channel 280A at Arthur to Class C1 status, to substitute Channel 277C for Channel 280C at Hazelton, North Dakota and to modify the license of station KVMI to specify operations on Channel 280C1 at Arthur.

Channel 280A has been substituted for Channel 244A for Station KVMI, Arthur, North Dakota in MM Docket No. 01-12, RM-10039 and becomes effective December 31, 2001. *Report and Order*, DA-01-2679 (released November 16, 2001). As shown in the attached engineering statement (Exhibit A, page one and Ex. 1.4), using a special reference point, the proposed upgrade for Channel 280A at Arthur to Class C1 status is fully spaced and located at a site with access to highways and three-phase electrical power.

In order to facilitate the upgrade of Channel 280A at Arthur to Class C1 status, it is also proposed to substitute vacant Channel 277C for Channel 280C at Hazelton, North Dakota, a currently-vacant and unapplied for allotment. As shown in the attached engineering statement (Exhibit A), using a special reference point, proposed Channel 227C is fully spaced at Hazelton

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and has access to electrical power lines and roadways. While coverage shown is based on full Class C operating parameters of 100 kW at 600 meters HAAT, Class C operation reduced to 100 kW at 300 meters HAAT will still provide city coverage to Hazelton. A hypothetical 10-bay antenna would require a 331 meter AGL tower to achieve minimum coverage of Hazelton.

The proposed amendments to the Table of Allotments would serve the public interest by maximizing usage of the Channel 280 allotment at Arthur, allowing for an increase in coverage, and therefore service. At the same time, Hazelton would maintain a vacant, fully-spaced Class C allotment available to anyone who wishes to serve that area. The attached supplementary engineering statement regarding population (Exhibit B) shows that the proposed amendments would allow for the provision of service to an additional 36,029 people in the 60 dBu contour of Arthur, ND, an increase of more than 600%. When adjusted for the loss of potential service to only 800 people in the Hazelton 60 dBu contour (less than 1% of its current potentially served population), the proposed allotment changes together afford a net gain of service to 35,229 people.

Although no prejudice will result from substituting one fully-spaced C Class allotment for a vacant one in the same community, because this rule making is subject to public comment, anyone interested in Channel 280C at Hazelton, or otherwise affected by this proceeding, would have ample opportunity to comment. ¹

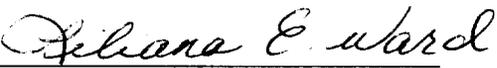
¹Channel 280C at Hazelton is an Auction No. 37 allotment. *Public Notice*, DA-488 (released February 21, 2001). However, Auction No. 37 has been postponed pending resolution of issues related to the selection criteria to be used in “hybrid” application proceedings involving commercial and non-commercial frequencies. *Public Notice*, DA 01-2148 (released September 14, 2001). During this postponement, which is of indefinite duration, the Commission should continue to accommodate expressions of interest which do not eliminate the availability of a channel for a future auction.

Should the Commission substitute Channel 280C for Channel 277C at Hazleton, North Dakota, and thereby allow an upgrade of Channel 280A at Arthur, North Dakota to Class C1 status, Vision will file the requisite application to modify the license for station KVMI to change its status from Class A to Class C1.

WHEREFORE, these matters considered, it is respectfully requested that the Commission (1) amend Section 73.202(b) of its rules, FM Table of Allotments, by upgrading Channel 280A at Arthur, North Dakota, to Class C1 status; (2) amend Section 73.202(b) of its rules, FM Table of Allotments, by substituting Channel 277C for Channel 280C at Hazelton, North Dakota; and (3) modify the license for station KVMI to change its status from Class A to Class C1.

Respectfully submitted,

VISION MEDIA INCORPORATED

By: 
Harry C. Martin
Liliana E. Ward
Its Attorneys

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 N.17th St., 11th Floor
Arlington, VA 22209-3801
(703) 812-0400

December 7, 2001

EXHIBIT A

ENGINEERING REPORT

**Petition for Rulemaking
to Amend §73.202(b)
on behalf of
KVMI(FM) – Arthur, ND
VAC ALLO – Hazelton, ND**

November 2001

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

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Channel 280C - Hazelton, ND

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12. Exhibit 2.5 – Map Showing City Coverage for Channel 277C

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.

November 20, 2001

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

ENGINEERING STATEMENT

In Support of a Petition to Amend §73.202(b)

The office of Munn-Reese, Inc. has been 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. Data contained in this report is responsive to the requirements of the Rules, as amended.

It is proposed to amend the Table of Allotments to upgrade Channel 280A, 103.9 MHz, at Arthur, ND to Channel 280C1. Channel 280A has been substituted for Channel 244A for Station KVMI, Arthur, ND in MM Docket No. 01-12, RM-10039 and becomes effective December 31, 2001. A special reference point located at 47° 19' 35" NL; 97° 46' 15" WL has been used for this rulemaking. The special reference point is fully spaced. To facilitate this amendment to the Table of Allotments, it is also proposed to move one vacant channel allocation. Currently Channel 280C is allocated to Hazelton, ND. It is proposed to relocate this allocation to Channel 277C while maintaining Hazelton, ND as the city of license. The special reference point of 46° 24' 01" NL; 100° 59' 44" WL has been used for this rulemaking and is fully spaced.

Arthur, ND: A pertinent portion of the V-Soft™ Communications, FMContours™ spacing allocation study for the present KVMI - Arthur, ND Channel 280A allocation has been included in **Exhibit 1.1**. The spacing allocation study for the proposed KVMI Channel 280C1 operation has been included in **Exhibit 1.2**. A Probe II™ map showing the KVMI 280C1 open area has been included as **Exhibit 1.3**. As seen in the open area map and the allocation study, the special reference point will be fully spaced. A portion of 7.5 minute topographic mapping showing the special reference point has been included as **Exhibit 1.4**. As seen on the map, the special reference point is a viable site with access to three phase electrical power. A map showing 70 dBu coverage of Arthur from the special reference point has been included as **Exhibit 1.5**.

Hazelton, ND: A pertinent portion of the V-Soft™ Communications, FMContours™ spacing allocation study for the present vacant Hazelton, ND Channel 280C allocation has been included in **Exhibit 2.1**. The spacing allocation study for the proposed Hazelton Channel 277C vacancy has been included in **Exhibit 2.2**. A Probe II™ map showing the Hazelton 277C open area has been included as **Exhibit 2.3**. As seen in the open area map and the allocation study, the special reference point will be fully spaced. A portion of 7.5 minute topographic mapping showing the special reference point has been included as **Exhibit 2.4**. As seen on the map, the special reference point is a viable site with access to electrical power lines and roadways. A map showing 70 dBu coverage of Hazelton from the special reference point has been included as **Exhibit 2.5**. While coverage shown is based on full Class C operating parameters of 100 kW at 600 meters HAAT, Class C operation reduced to 100 kW at 300 meters HAAT will still provide city coverage to Hazelton. A hypothetical 10-bay antenna would require a 331 meter AGL tower to achieve minimum coverage of Hazelton.

A grant of this amendment to the Table of Allotments will maximize the use for the Arthur, ND allocation, while having little affect on the Hazelton, ND allocation.

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>
Arthur, ND	280A	280C1
Hazelton, ND	280C	277C

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

EXHIBIT 1.1

Present KVM Channel 280A Allocation

REFERENCE		DISPLAY DATES
47 05 42 N	CLASS = A	DATA 11-10-01
97 18 01 W	Current Spacings	SEARCH 11-16-01
----- Channel 280 - 103.9 MHz -----		

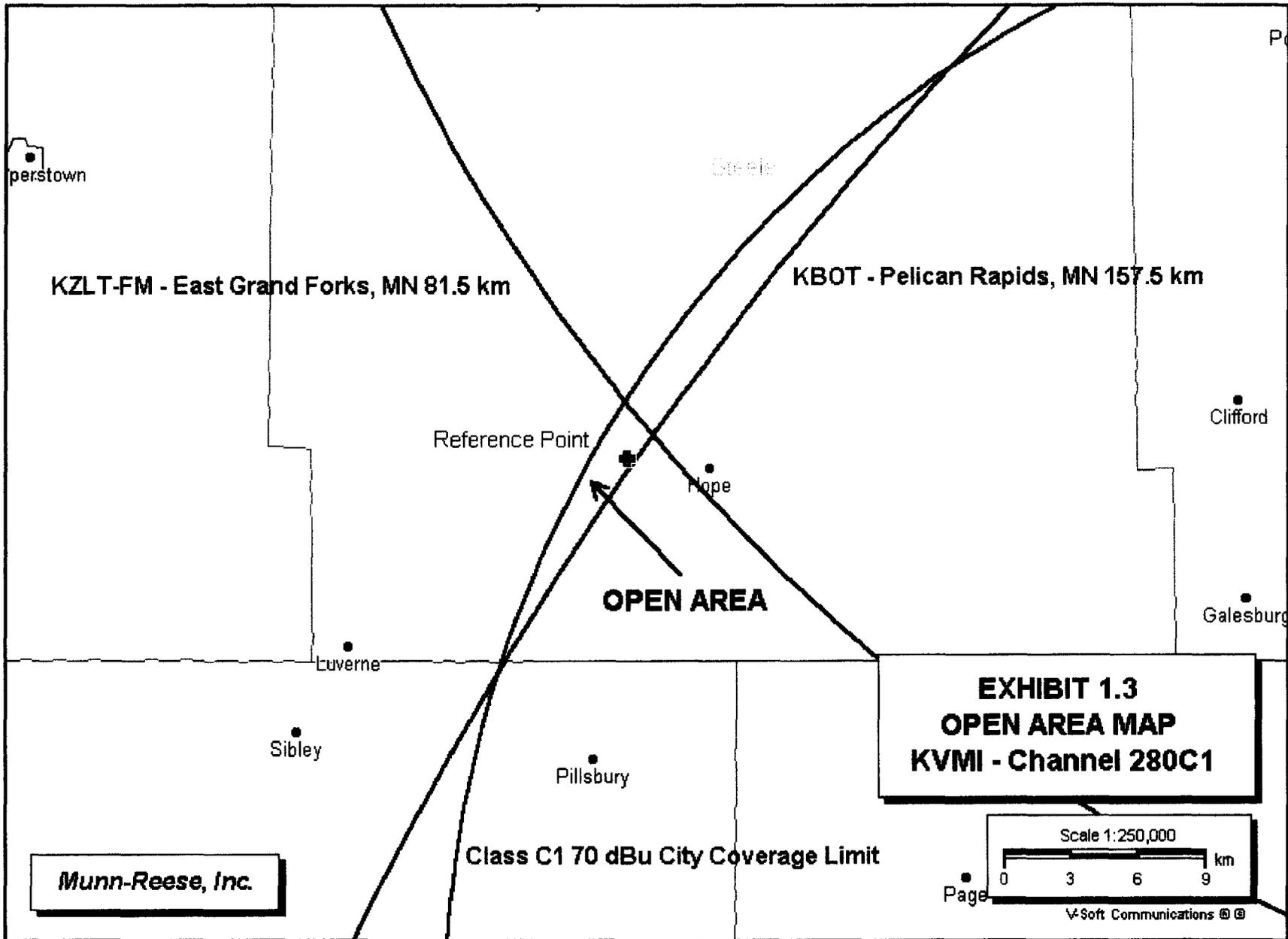
Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.				HAAT		
RADD	ADD 280A	Arthur	ND	0.00	0.0	114.5	-114.50
47 05 42	97 18 01		6.000 kW		100 M		
Site restriction: 6.35 kilometers (3.94 miles west)							
KBOT	LIC 281C2	Pelican Rapids	MN	113.93	125.2	105.5	8.43
46 29 57	96 05 10	CN	50.000 kW		150 M		
		Washington Radio, Inc,					
KZLTFM	LIC 282C1	East Grand Forks	MN	84.30	19.2	74.5	9.80
47 48 37	96 55 46	CN	100.000 kW		135 M		
		Krad, Inc.					
ALLO	VAC 280C	Hazelton	ND	243.90	259.0	225.5	18.40
46 38 05	100 25 40		100.000 kW		600 M		
Accepted by Canada 990219.							
KZCR	LIC 277C1	Fergus Falls	MN	109.25	129.3	74.5	34.75
46 28 06	96 11 54	CN	100.000 kW		198 M		
		Result Radio, Inc					
KKBJFM	CP 279C1	Bemidji	MN	195.75	73.9	132.5	63.25
47 33 21	94 48 04	CX	100.000 kW		146 M		
		R.p. Broadcasting					
KKBJFM	LIC 279C1	Bemidji	MN	195.75	73.9	132.5	63.25
47 33 21	94 48 04	C	100.000 kW		139 M		
		R.p. Broadcasting					
5/23/01: Cleared in the Treaty on Channel 279C							
KZZY	LIC 278C1	Devils Lake	ND	159.17	309.4	74.5	84.67
47 59 28	98 56 57	CN	100.000 kW		150 M		
		Double Z Broadcasting, Inc					
KSJZ	LIC 227C1	Jamestown	ND	111.61	254.4	21.5	90.11
46 49 03	98 42 34	CN	57.000 kW		78 M		
		Chesterman Communications,					
KZZY.C	CP 278C1	Devils Lake	ND	164.63	307.4	74.5	90.13
47 58 49	99 03 11	CN	100.000 kW		138 M		
		Double Z Broadcasting, Inc					
KGIMFM	LIC 279C1	Redfield	SD	234.97	207.2	132.5	102.47
45 12 30	98 40 20	CN	100.000 kW		169 M		
		Pheasant Country Broadcast					
KBHL	LIC 280A	Osakis	MN	219.21	128.8	114.5	1

EXHIBIT 1.2

Proposed KVMI Channel 280C1 Allocation

REFERENCE		DISPLAY DATES
47 19 35 N	CLASS = C1	DATA 11-10-01
97 46 15 W	Current Spacings	SEARCH 11-16-01
----- Channel 280 - 103.9 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
RADD	ADD 280A	Arthur	ND	43.96	125.7	199.5
47 05 42	97 18 01	6.000 kW	100 M			
Site restriction: 6.35 kilometers (3.94 miles west						
KBOT	LIC 281C2	Pelican Rapids	MN	157.89	125.1	157.5
46 29 57	96 05 10	CN 50.000 kW	150 M			
Washington Radio, Inc, BLH19940711KB						
KZLTFM	LIC 282C1	East Grand Forks	MN	83.08	49.2	81.5
47 48 37	96 55 46	CN 100.000 kW	135 M			
Krad, Inc. BLH19860602KG						
ALLO	280C	Brandon	MB	321.76	330.9	301.5
49 50 00	99 57 00	100.000 kW	600 M			
RM9565						
R---	DEL 280C	Brandon	MB	321.76	330.9	301.5
49 50 00	99 57 00	100.000 kW	600 M			
Proposed by Canada 970618-Approved by Commission 970804						
R---	ADD 280C1	Brandon	MB	321.76	330.9	291.5
49 50 00	99 57 00	100.000 kW	299 M			
KZZY	LIC 278C1	Devils Lake	ND	115.31	310.4	81.5
47 59 28	98 56 57	CN 100.000 kW	150 M			
Double Z Broadcasting, Inc BLH19840406DT						
KZZY.C	CP 278C1	Devils Lake	ND	120.68	307.6	81.5
47 58 49	99 03 11	CN 100.000 kW	138 M			
Double Z Broadcasting, Inc BPH19980417IF						
KKBJFM	LIC 279C1	Bemidji	MN	225.45	82.4	176.5
47 33 21	94 48 04	C 100.000 kW	139 M			
R.p. Broadcasting BLH20000607ACL						
5/23/01: Cleared in the Treaty on Channel 279C						
KKBJFM	CP 279C1	Bemidji	MN	225.45	82.4	176.5
47 33 21	94 48 04	CX 100.000 kW	146 M			
R.p. Broadcasting BPH20010209AAA						
R---	ADD 281C1	Winnipeg	MB	273.28	9.5	216.5
49 44 56	97 08 38	100.000 kW	299 M			
Proposed by Canada 970618-Specially negotiated, short-spaced allotment- Ap						
proved by Commission 970804						
KSJZ	LIC 227C1	Jamestown	ND	91.01	231.8	33.5
46 49 03	98 42 34	CN 57.000 kW	78 M			
Chesterman Communications, BLH19881201KA						
KBHL	LIC 280A	Osakis	MN	263.14	128.0	199.5
45 50 24	95 05 56	C 6.000 kW	100 M			
Christian Heritage Bcsting BMLED19990413KB						



LIVERNE SE QUADRANGLE
NORTH DAKOTA - STEELE CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

(SHEEPBROOK)
6478 / NW

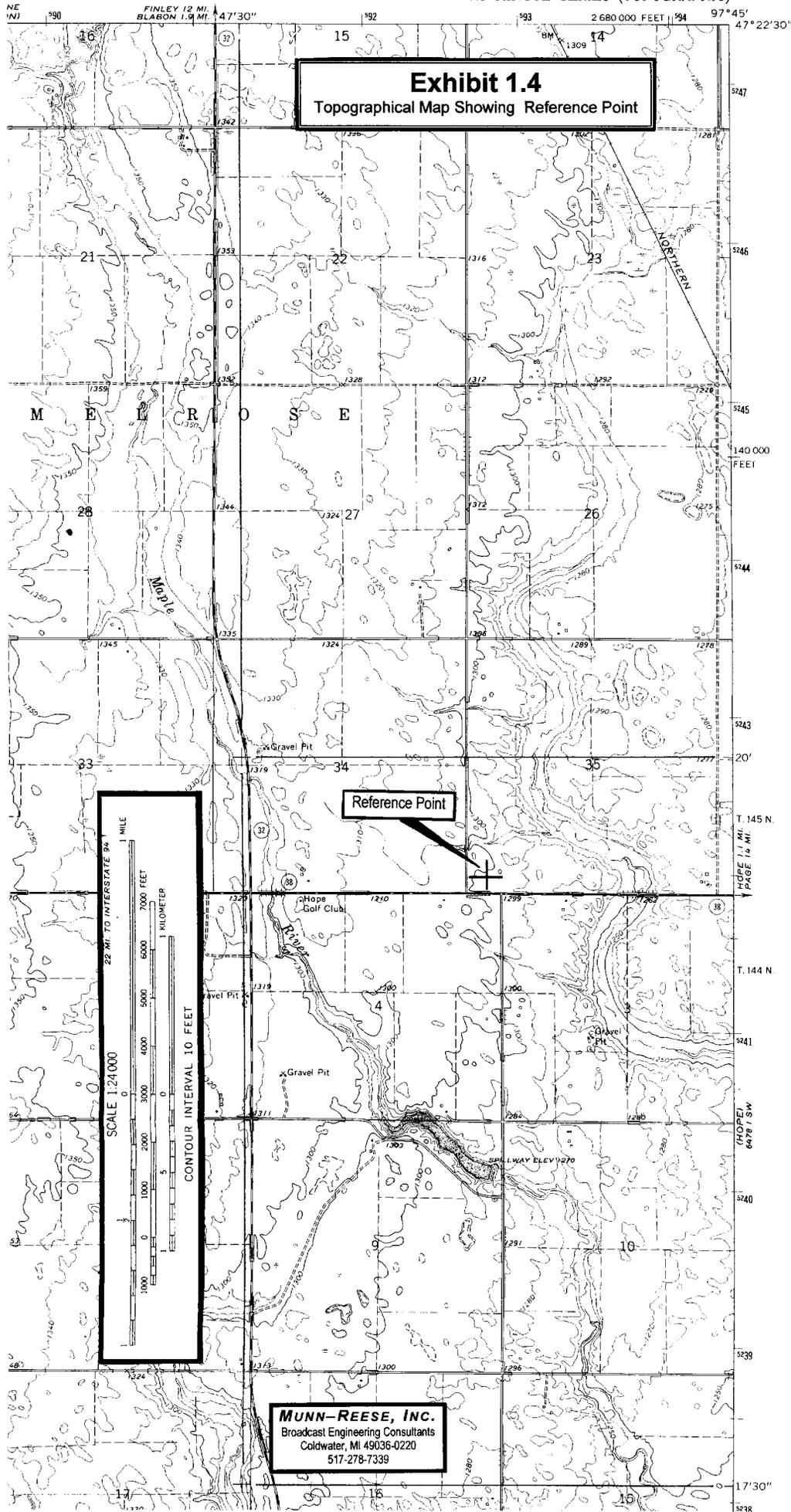
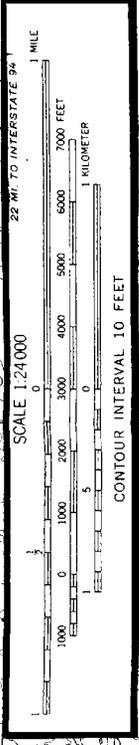


Exhibit 1.4
Topographical Map Showing Reference Point

Reference Point



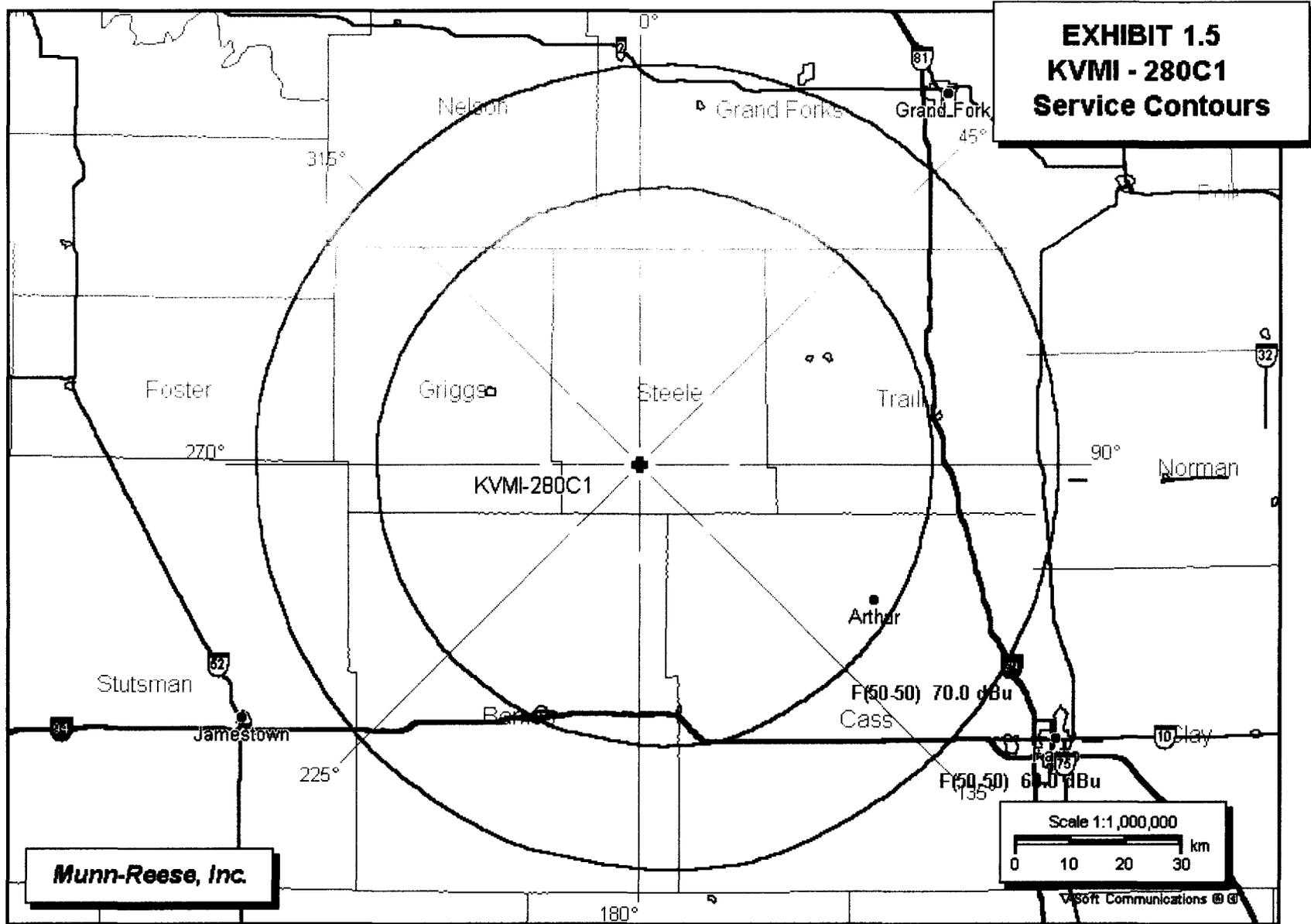
MUNN-REESE, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036-0220
517-278-7339

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PAGE 14 MI.
PAGE 14 MI.

T. 144 N.

R. 6478 / SW
R. 6479 / SW

17'30"
5218



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

EXHIBIT 2.1

Present Hazelton Vacant Channel 280C Allocation

REFERENCE		DISPLAY DATES
46 38 05 N	CLASS = C	DATA 11-10-01
100 25 40 W	Current Spacings	SEARCH 11-16-01
----- Channel 280 - 103.9 MHz -----		

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.				HAAT		
ALLO	VAC 280C	Hazelton	ND	0.00	0.0	289.5	-289.50
46 38 05	100 25 40		100.000 kW		600 M		
Accepted by Canada 990219.							
KGIMFM	LIC 279C1	Redfield	SD	209.00	138.8	208.5	0.50
45 12 30	98 40 20	CN	100.000 kW		169 M		
Pheasant Country Broadcast BMLH19990707KE							
RADD	ADD 280A	Arthur	ND	243.90	76.7	225.5	18.40
47 05 42	97 18 01		6.000 kW		100 M		
Site restriction: 6.35 kilometers (3.94 miles west							
R---	DEL 280C	Brandon	MB	357.36	5.5	305.5	51.86
49 50 00	99 57 00		100.000 kW		600 M		
Proposed by Canada 970618-Approved by Commission 970804							
ALLO	280C	Brandon	MB	357.36	5.5	305.5	51.86
49 50 00	99 57 00		100.000 kW		600 M		
RM9565							
R---	ADD 280C1	Brandon	MB	357.36	5.5	301.5	55.86
49 50 00	99 57 00		100.000 kW		299 M		
961115	CP 281C1	Tioga	ND	271.12	315.4	208.5	62.62
48 20 26	102 59 55	CN	100.000 kW		180 M		
Northern Lights Broadcasti BPH19961115MD							
One-step application (from vacant Channel 280A)							
KZZY.C	CP 278C1	Devils Lake	ND	182.17	34.2	104.5	77.67
47 58 49	99 03 11	CN	100.000 kW		138 M		
Double Z Broadcasting, Inc BPH19980417IF							
KZZY	LIC 278C1	Devils Lake	ND	187.72	35.9	104.5	83.22
47 59 28	98 56 57	CN	100.000 kW		150 M		
Double Z Broadcasting, Inc BLH19840406DT							
KSJZ	LIC 227C1	Jamestown	ND	132.92	80.6	40.5	92.42
46 49 03	98 42 34	CN	57.000 kW		78 M		
Chesterman Communications, BLH19881201KA							
RADD	ADD 279C2	Newell	SD	314.78	228.8	187.5	127.28
44 43 58	103 25 18		50.000 kW		150 M		

EXHIBIT 2.2

Proposed Hazelton Vacant Channel 277C Allocation

REFERENCE	CLASS = C	DISPLAY DATES
46 22 06 N	Current	DATA 11-10-01
100 55 49 W	Spacings	SEARCH 11-16-01

----- Channel 277 - 103.3 MHz -----

Call	Channel	Location	Power	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.				HAAT		
ALLO	VAC 280C	Hazelton	ND	48.63	52.2	104.5	-55.87
46 38 05	100 25 40		100.000 kW		600 M		

Accepted by Canada 990219.

ALLO	VAC 276C1	Wimbledon	ND	208.87	63.7	208.5	0.37
47 10 18	98 27 30		100.000 kW		299 M		

Accepted by Canada as a Class C1 on 990412

ALLO	VAC 276C1	Burlington	ND	215.64	350.2	208.5	7.14
48 16 42	101 25 36		100.000 kW		299 M		

A filling Window for this channel will be opened in a subsequent order.

KZZY.C CP	278C1	Devils Lake	ND	228.84	37.7	208.5	20.34
47 58 49	99 03 11	CN	100.000 kW		138 M		

Double Z Broadcasting, Inc BPH19980417IF

KZZY	LIC 278C1	Devils Lake	ND	234.73	39.0	208.5	26.23
47 59 28	98 56 57	CN	100.000 kW		150 M		

Double Z Broadcasting, Inc BLH19840406DT

KZCR	LIC 277C1	Fergus Falls	MN	363.96	86.5	269.5	94.46
46 28 06	96 11 54	CN	100.000 kW		198 M		

Result Radio, Inc BLH19811005AH

KGIMFM	LIC 279C1	Redfield	SD	217.84	125.6	104.5	113.34
45 12 30	98 40 20	CN	100.000 kW		169 M		

Pheasant Country Broadcast BMLH19990707KE

KYDT	LIC 276C1	Sundance	WY	346.46	233.8	208.5	137.96
44 28 35	104 26 54	CN	25.000 kW		503 M		

Ultimate Caps, Inc. BLH19971223KE

RADD	ADD 279C2	Newell	SD	266.26	227.7	104.5	161.76
44 43 58	103 25 18		50.000 kW		150 M		

KBWSFM	LIC 275C1	Sisseton	SD	285.02	105.9	104.5	180.52
45 36 52	97 24 51	CN	100.000 kW		140 M		

Pheasant Country Broadcast BLH19840201AE

ALLO	VAC 224C1	Pierre	SD	225.39	169.9	40.5	184.89
44 22 15	100 26 00		100.000 kW		299 M		

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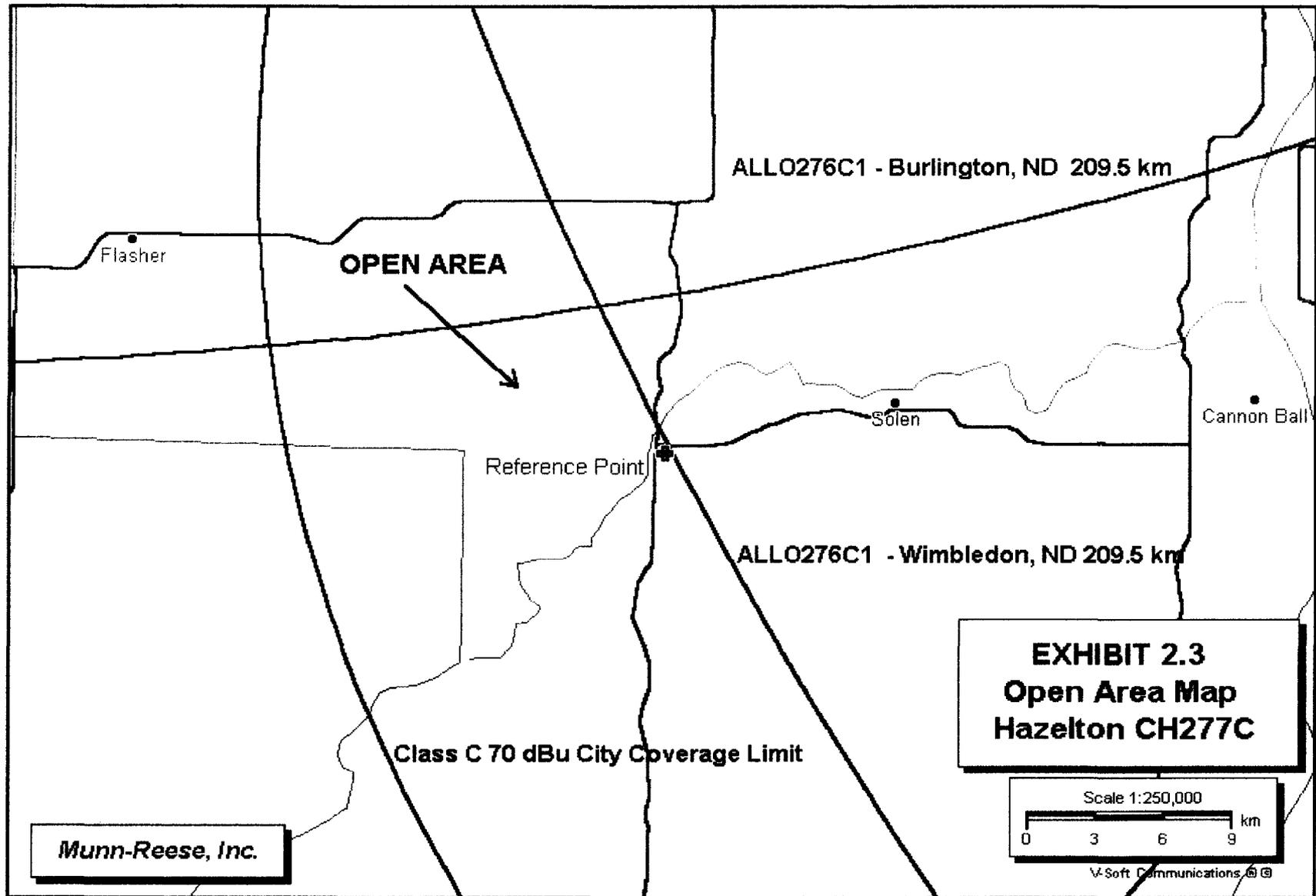
RADD	ADD 280A	Arthur	ND	288.99	72.4	94.5	194.49
47 05 42	97 18 01		6.000 kW		100 M		

Site restriction: 6.35 kilometers (3.94 miles west

KGFXFM	LIC 224A	Pierre	SD	225.78	169.3	28.5	197.28
44 22 15	100 24 17	CN	3.000 kW		82 M		

Robert E. Ingstad Properti BLH19820113AB

To Amend to Channel 224C1 per D90-140-From Channel 224C3 per D89-153



ES
3 INTERIOR
RVEY

SOLE N SW QUADRANGLE
NORTH DAKOTA
7.5 MINUTE SERIES (TOPOGRAPHIC)

Exhibit 2.4
Topographical Map Showing Reference Point

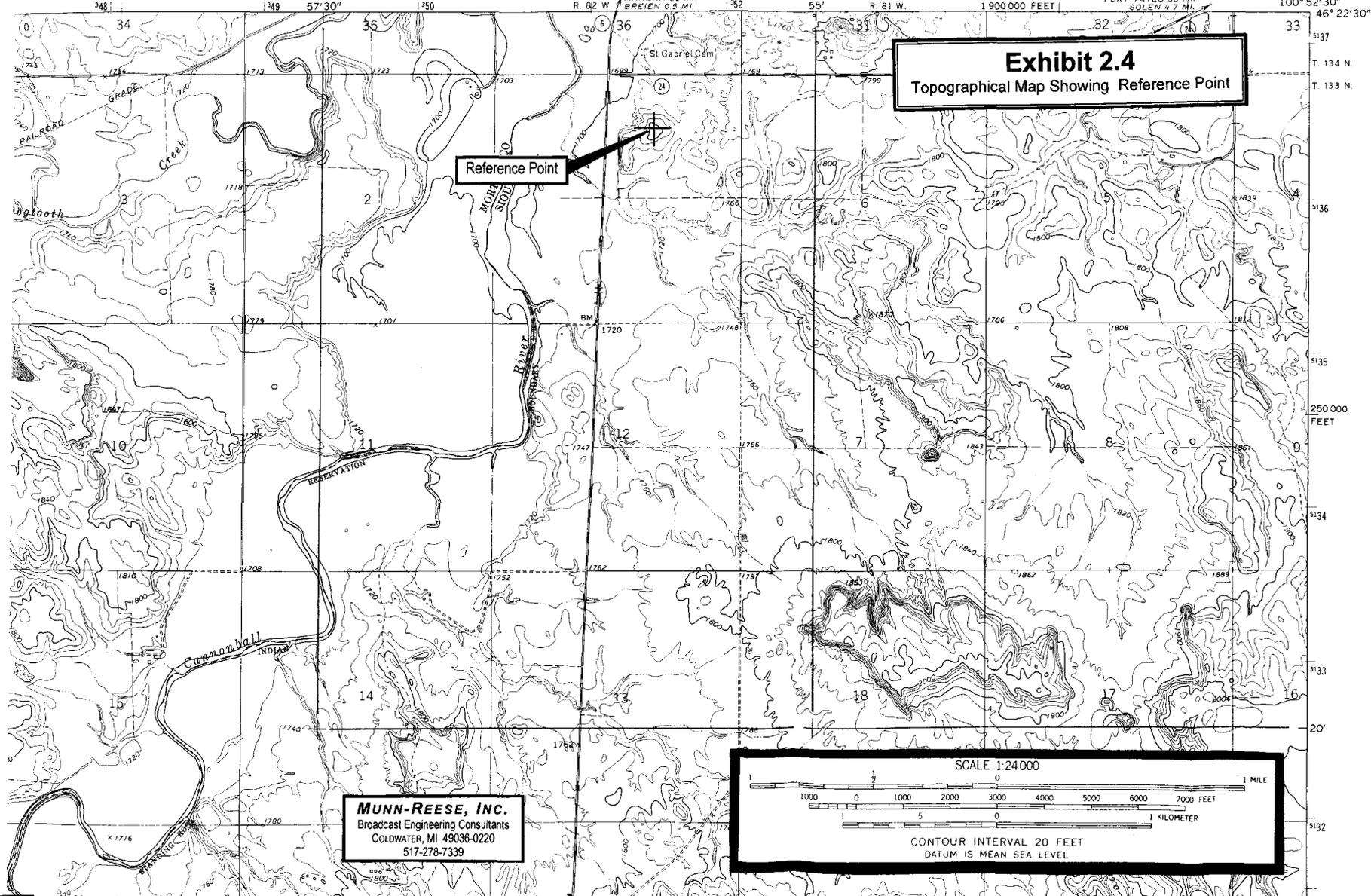
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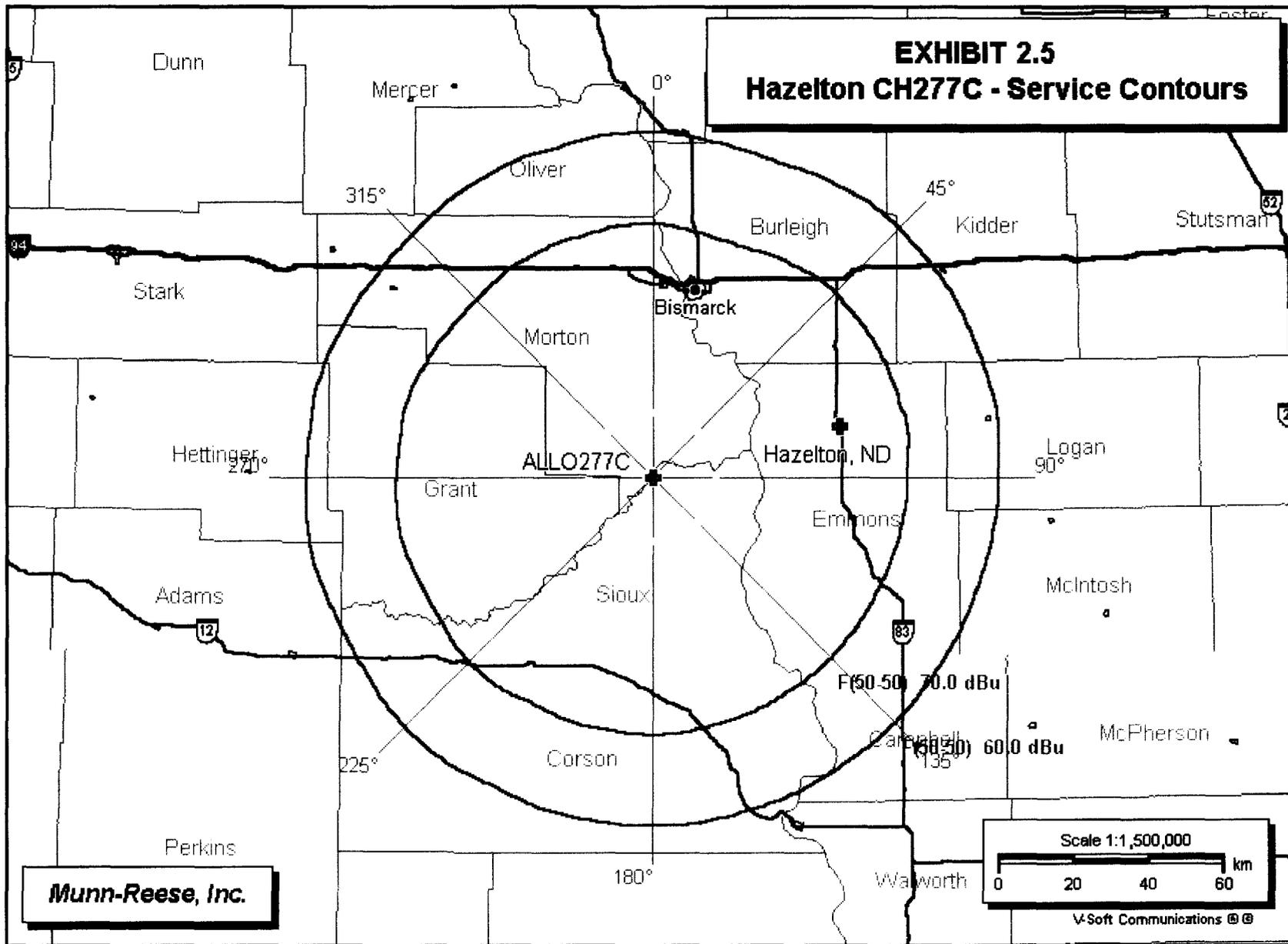
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COLDWATER, MI 49036-0220
517-278-7339

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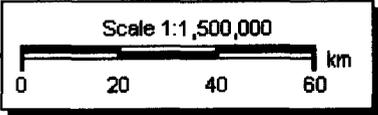
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**EXHIBIT 2.5
Hazelton CH277C - Service Contours**

Munn-Reese, Inc.



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

EXHIBIT B

ENGINEERING REPORT

Tabulation of Populations

Present & Proposed

Arthur, ND (KVMI)

Channel 280A to Channel 280C1

Present & Proposed

Hazelton, ND

Channel 280C to Channel 277C

December, 2001

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Broadcast Engineering Consultants
Coldwater, MI 49036

TABULATION OF POPULATIONS

Arthur, ND

Present Channel 280A – 6 kW at 100 meters HAAT:

<u>CONTOUR</u>	<u>AREA</u>	<u>POPULATION</u>
60.0 dBu	2,511.58 km ²	6,797
70.0 dBu	828.63 km ²	1,641

47° 05' 42" NL; 97° 18' 01" WL

Proposed Channel 280C1 – 100 kW at 299 meters HAAT:

<u>CONTOUR</u>	<u>AREA</u>	<u>POPULATION</u>
60.0 dBu	16,421.08 km ²	42,826
70.0 dBu	7,878.61 km ²	21,758

47° 19' 35" NL; 97° 46' 15" WL

Hazelton, ND

Present Channel 280C – 100 kW at 600 meters HAAT:

<u>CONTOUR</u>	<u>AREA</u>	<u>POPULATION</u>
60.0 dBu	26,443.64 km ²	113,525
70.0 dBu	14,351.61 km ²	101,683

46° 38' 05" NL; 100° 25' 40" WL

Proposed Channel 277C – 100 kW at 600 meters HAAT:

<u>CONTOUR</u>	<u>AREA</u>	<u>POPULATION</u>
60.0 dBu	26,392.15 km ²	112,725
70.0 dBu	14,309.89 km ²	100,614

46° 22' 06" NL; 100° 55' 49" WL

The population within the contours were measured using Probe II™ computerized software as supplied by V-Soft™ communications. Population data has been derived using U.S. Census 2000 Block Data.

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.

December 5, 2001

MUNN-REESE, INC.

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

By Wayne S. Reese
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