

**Petition for Rulemaking  
Before the  
Federal Communications Commission  
Washington, D.C.**

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FCC - MAILROOM

By Public Notice DA 03-2990, released by the Federal Communications Commission ("FCC") on September 30, 2003, the FCC invited petitions to reserve existing non-reserved band FM allotments for use by non-commercial/educational ("NC/E") broadcasters if the petitioners for such allotments could demonstrate that petitions met two specific criteria.

This Petition is being filed by Hi-Line Radio Fellowship, Inc., ("HLRF" or "Petitioner") with the purpose of requesting that the FCC designate the following existing non-reserved band FM allocation for NC/E use:

**FM Channel Number:** 299  
**Class:** A  
**Community of License:** Boulder, Montana

The City of Boulder, Montana, is surrounded by mountains. These high mountains block the reception of signals from nearby communities. Boulder does not currently have any local FM or AM broadcast stations. The only FM signal which can be received in Boulder is that of FM translator K296AS. The Petitioner's proposal would provide for establishment of a new NC/E FM radio station at Boulder, which would provide the community with its first local FM or AM radio service of any kind.

In its Public Notice, the FCC stated that an existing non-reserved band allotment could be reserved for non-commercial/educational use if the petitioner could demonstrate that *"it is technically precluded from using a reserved channel and would provide a first and/or second NC/E radio service to at least 10 percent of the population within the 1 mV/m contour of its proposed station."* This Petition meets the criteria required in the FCC's Public Notice. An exhibit in support of this Petition is attached as **Exhibit A**.

In the event that the FCC chooses to grant this Petition, the Petitioner hereby states that IT WILL APPLY TO THE FCC FOR A CONSTRUCTION PERMIT authorizing it to build and operate a station in accordance with the new allotment, at such time as the FCC would open a filing window enabling the Petitioner to do so.

The Petitioner proposes the following set of reference coordinates:

**Latitude:** 46 15 34  
**Longitude:** 112 09 08

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From the proposed coordinates, the Petitioner's operation of a Class A FM station would provide a 3.16 mV/m (70 dB/u) signal which would encompass 100% of the area within the city limits of the City of Boulder, Montana.

Questions concerning this Petition may be addressed to the undersigned at: PO Box 4218, Helena, MT., 59604-4218, or (888) 443-5237.

This Petition is being signed and submitted by a duly authorized officer in the Petitioner's corporation this 21<sup>st</sup> day of November, 2003.

Respectfully Submitted,



Roger Lonquist  
2<sup>nd</sup> Vice-Chairman  
Hi-Line Radio Fellowship, Inc.

## Exhibit A

In its Public Notice, the FCC stated that an existing non-reserved band allotment could be reserved for non-commercial/educational use if the petitioner could demonstrate that:

- 1) *“it is technically precluded from using a reserved channel; and,*
- 2) *it would provide a first and/or second NC/E radio service to at least 10 percent of the population within the 1 mV/m contour of its proposed station.”*

### I. Technical – TV Channel 6

The Petitioner is technically precluded from filing for a NC/E FM radio station by its close proximity to KTVM-TV, which broadcasts on TV Channel 6.

KTVM-TV broadcasts on TV Channel 6, with a power of 100,000 Watts Effective Radiated Power, with a HAAT of 591 Meters, from coordinates NL 46 00 27, WL 112 26 30.

Section 73.525(a) of the Commission’s Rules & Regulations defines any TV station operating on Channel 6 as an *Affected TV Channel 6 Station* if it is located within specific distances of a NC/E FM station operating on a reserved band channel. Pursuant to the information set forth in *Table A* of the Section, KTVM-TV is an *Affected TV Channel 6 Station*, as KTVM’s transmitter site is located 35.8 kilometers from the Petitioner’s proposed transmitter site, which is well within the range specified in *Table A*.

### II. First and/or Second NC/E Radio Service

The Petitioner’s proposed station would provide Boulder, Montana, with its first NC/E radio service. At this time the only radio service in Boulder is an FM translator, K296AS.

Boulder, Montana, is surrounded by high mountains which block the reception of any FM radio services from neighboring towns. Of the NC/E FM stations currently operating or authorized in such neighboring communities, only KVCM, Helena, Montana, *appears* to provide a 1.0 mV/m signal over any portion of the City of Boulder. While contour maps show KVCM providing a 1.0 mV/m signal over Boulder, shadowing studies and actual on-location efforts to receive the signal of KVCM reveal that it is blocked by the Boulder Hill, which is located to the north of Boulder.