

DECLARATION

I, Ronald Kramer, am Executive Director of Jefferson Public Radio (JPR), a network of public radio stations serving southern Oregon and northern California and I have served in this position for over twenty-nine years. JPR is owned and operated by Southern Oregon University.

Southern Oregon University/JPR recently filed a Form 349 application to construct a new FM translator to serve Mendocino CA. That application was later determined to be a "singleton" in the filing window but was subsequently dismissed by the Commission because the proposed ERP exceeded the maximum permitted by the Rules. As demonstrated by an accompanying Declaration from McClanathan and Associates, our consulting engineers, our error in proposing a higher ERP resulted from our consultant's misreading of the latitude at the proposed transmission site with respect to the power limitation Rule.

This translator application was submitted in response to significant public expressions of interest in the community in receiving the programming of our station KNHT(FM), Rio Dell CA. KNHT provides fringe coverage in the Mendocino area and the station's programming, consisting largely of classical music and NPR News, is not otherwise available in Mendocino County. Having been asked by local residents to find a means of making KNHT's programming more widely available, we prepared and filed the subject application to address this expression of community interest.

We are requesting reconsideration of this dismissal in hopes of being able to satisfy this public request.

I hereby declare under penalty of perjury that the foregoing statements are true and correct.

A handwritten signature in black ink, appearing to read "Ronald Kramer", written in a cursive style.

December 24, 2003

DECLARATION

I, ROBERT A. McCLANATHAN, declare the following to be true to the best of my knowledge and belief under penalty of perjury.

1. That he is President of McClanathan and Associates, Inc., Professional Electrical Engineers.
2. That he is a licensed Professional Electrical Engineer in the District of Columbia and the States of Oregon, California and Washington and that he is a member of the Association of Federal Communications Consulting Engineers and that he is a licensed radio operator holding FCC License Number PG-13-13526.
3. That he has been engaged in governmental, educational, commercial radio and television broadcast engineering and developments since 1955.
4. That he has been retained by State of Oregon acting by and through the State Board of Higher Education for Southern Oregon University to prepare the engineering exhibits relative to the application for a new FM translator at Medocino, CA, FCC File No. BNPFT-20030709AAR, Facility ID #144768.
5. That, for the original preparation and filing of this application, he calculated that a maximum antenna effective radiated power of 0.092 watts could be employed in compliance with 47 C.F.R. 74.1235(b)(2).
6. That this antenna power calculation was in error, since the proposed antenna site is located is 73 km south of the geographic 40th parallel and is located in Zone I-A as described in 47 C.F.R. 73.205(b) and that the maximum power must be calculated in accordance with 47 C.F.R. 74.1235(b)(1) which limits the maximum ERP to 0.010 kW as correctly stated in the letter to the Applicant from James D. Bradshaw, FCC-MMB, dated December 2, 2003.
7. That, the undersigned engineer respectfully requests that the application be reinstated at the correct MERP of 0.010 kW to comply with all FCC Rules and Regulations.


Robert A. McClanathan, P.E.

December 24, 2003