

TECHNICAL NARRATIVE

This Technical Statement and attached exhibits were prepared on behalf of Milestone Radio II, LLC (“Milestone”), licensee of station KBGY, Channel 298C2, Facility ID No. 84475, Faribault, Minnesota. Milestone herein proposes to modify the license of KBGY to operate on Channel 298C3, licensed to Elko New Market, Minnesota.

Overview

One minor change to the FM spectrum is being proposed. The minor change involves an FM class change, a city of license change and transmitter site change for station KBGY.

Modification of KBGY from Channel 298C2 at Faribault, Minnesota to Channel 298C3 at Elko New Market, Minnesota

Milestone seeks to modify KBGY, Channel 298C2 Faribault, Minnesota to be licensed to Elko New Market, Minnesota on Channel 298C3. Elko New Market is an incorporated city in Scott County, Minnesota. Faribault is an incorporated city in Rice County, Minnesota. The proposed Channel 298C3 reference site at 44° 32’ 48.5” North Latitude and 93° 16’ 10.5” West Longitude (NAD83) for KBGY is mutually exclusive with the licensed facility of KBGY. This modification is also compliant with all the requirements of 47 CFR §73.315 and with 47 CFR §73.207 with one exception. The Hypothetical/Application site Channel Study for KBGY on Channel 298C3 at Elko New Market, MN shows a short-spacing to one existing station. The proposed KBGY application site is short spaced to station KQQL 300C, licensed to Anoka, MN by 7.0 km. Milestone requests that KQQL show cause why it should not be downgraded to 300C0. KBGY will be clear by 2.0 km with KQQL downgraded to 300C0. Applicant certifies

that, per §73.3573, there are no alternative channels available for use at Elko New Market, MN using the proposed facilities. Milestone is proposing to implement this change at a new tower site. As such, the Federal Aviation Administration has been apprised of this proposal. The coordinates of the proposed application site are 44° 32' 48.5" North Latitude and 93° 16' 10.5" West Longitude (NAD83).

This application includes a comprehensive Section 307(b) analysis that demonstrates the proposed change of community of license would serve the public interest, as required by Section 307(b) of the Communications Act of 1934, under Priority 3 "First local service" of Revision of FM Assignment Policies and Procedures, Second Report and Order, 90 FCC 2d 88 (1982). Elko New Market will receive its first local service and Faribault will continue to receive service from KQCL(FM), Facility ID No. 54628, and KDHL(AM), Facility ID No. 54634. The KBGY proposed modification is believed to be consistent with the policies established in FCC 11-28, Second Report and Order in *Rural Radio*¹ released on March 3, 2011 and FCC 12-127 and Second Order on Reconsideration in *Rural Radio*² released on October 12, 2012.

¹ *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures*, Second Report and Order, First Order on Reconsideration, and Second Further Notice of Proposed Rulemaking, 26 FCC Rcd 2556 (2011) ("Second R&O").

² *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures*, Second Order on Reconsideration, FCC 12-127 (rel. Oct 12, 2012) ("Second Order").

International Borders

This KBGY minor modification application is not located within 320 kilometers of the border with Mexico or Canada therefore no coordination is required.