



April 15, 2002

Federal Communications Commission
Washington, DC 20554

Dear Sir/Madam,

The Organization for Northern Development, d/b/a Out North in Anchorage, Alaska is hereby submitting a minor change amendment to its Low Power FM (LPFM) license application for channel 284 (104.7-FM), File number AK BNPL-20000602AFS. Out North is now submitting an amendment to that application to make the minor change to channel 285 (104.9-FM). While we submitted a similar amendment on June 13, 2001, the current amendment request reflects a change in circumstances since that time that makes this situation unique. While we recognize the FCC's policy not to consider any amendments on LPFM applications currently listed in Appendix B of the second Report and Order until a remedial window is opened, current circumstances now allow the third adjacent violation to be addressed by a minor change in the original application. We urge the FCC consider this amendment immediately, since there is no mutually exclusive application for either the current or amended to channel and granting the change and the license will have no effect on any other current LPFM applications.

Application History: In the original group V window, before congressional action required the protection of third adjacent frequencies, there were two applications for channel 284 in Anchorage, including Out North's. Once the changes in rules protecting third adjacent frequencies were announced, 284 became unavailable for LPFM stations. Since that time, however, KNIK-FM has moved its full-power broadcasting operation from channel 287 (105.3-FM) to channel 289 (105.7-FM). Thus creating an eligible LPFM frequency at channel 285 (104.9-FM).

Out North submitted on June 13, 2001 an application for a minor change to its original application to move to channel 285. We received an informal response from FCC staff stating that our application would not be evaluated until the remedial window is opened.

Unique facts merit immediate FCC consideration of Out North's amended application: In March 2002, Out North learned that the second applicant for channel 284, Independent Minority Broadcast Productions (IMBP) were no longer interested in pursuing their application for an LPFM license (File numbers AK BNPL-20000606ABF and AK BNPL-20000605AEK). Attached to this amendment is a letter signed by their official representative withdrawing their application.

With this withdrawal, Out North is now resubmitting its June 13, 2001 application for a minor change. Out North is now the only LPFM applicant for channel 284, and no other applicant or current LPFM or full power licensee would be affected by a minor change to channel 285. Out North's application for an LPFM license and our ability to develop resources necessary to support the operation of the new station have been damaged by the inordinate delay in processing this application. While we recognize that the changes in the rules that caused the delay were not in FCC control, we urge the FCC to limit further damage to Out North through the immediate consideration of our request for amendment and the granting of an LPFM license to Out North on channel 285.

Sincerely,

Jay Brause, projects director
Organization for Northern Development d/b/a Out North