

Exhibit 15-B
Showing Regarding Multiple Translators

University of Minnesota
Long-Form FM Translator Application
Minneapolis, MN FIN: 143025

As explained in the preceding Engineering Exhibit 15 to Section III, Question # 14, the Regents of the University of Minnesota (“University”) are filing two (2) long-form FM translator applications: this proposal for Minneapolis, Minnesota, Channel 283 (FIN: 143025), and a proposal for Falcon Heights, Minnesota, Channel 264 (FIN: 142994). As the Engineering Statement and map detail, the coverage areas of two translators include a minor overlap such that the two stations will -- in theory -- serve the same area. The overlap area is not substantial and is allowed by FCC rules because of the technical need for the University to utilize two translators in order to provide adequate coverage to the intended service area.

Pursuant to Section 74.1232(b) of the FCC’s rules, “more than one translator may be licensed to the same applicant, whether or not such translators serve substantially the same area, upon an appropriate showing of technical need for such additional stations.” The FCC has stated that “FM translators are intended to resolve reception problems” and the “need” for additional translators under Section 74.1232(b) “should be determined on technical grounds.”¹ Accordingly, “showings of ‘need’ should focus upon the technical necessity for the additional facilities.”²

The preceding Engineering portion of this Exhibit details the technical need for the two translator stations. First, the city grade coverage map demonstrates that the overlap between the two translator stations will not be substantial. In addition, the Engineering Statement describes how terrain obstruction creates a technical need for the two translators, regardless of the extent of any coverage overlap. Specifically, along the Mississippi River basin which runs through the Minneapolis area, the elevation drops from 300 meters above mean sea level to 221 meters above mean sea level. The elevation level weakens the strength of higher power signals reaching the river area, and would severely affect coverage from the proposed 10 watt Falcon Heights translator. Accordingly, the University also needs, for technical reasons, the Minneapolis translator (located at a down river main campus site) in order to reach southwestern portions of Minneapolis and the depressed area along the river that the Falcon Heights translator cannot serve. The low 10 watt power Falcon Heights translator site will be located east of the Mississippi River and will be unable to reach portions of the intended coverage area to the west of the river.

For these reasons, the University submits that these two translator applications fully comply with Section 74.1232(b).

¹ *Amendment of Part 74 of the Commission's Rules Concerning FM Translator Stations* 68 RR 2d 705, 5 FCC Rcd 7212, 1990 FCC LEXIS 6424 (December 4, 1990) at paragraph 75.

² *Id.*