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## GENERAL/TECHNICAL EXHIBIT, Major Change in Licensed Facility - Page one

Application KPWS-LP  
Facility ID 195503  
BLL-20150625ACB  
Manhattan, MT

### 1. Purpose and description:

***Need for change of the applicant's operating channel:*** The purpose of the within Application for Major Change of the referenced facility is to seek a new channel in order to correct an ongoing interference situation between the within facility and cochannel KOFK-LP of Bozeman, MT. That facility, an earlier-granted LPFM, did not show up on the channel search tools as a potential interferor/interferee; however, its 40 dBu interfering contour overlaps the entire 60 dBu contour of the applicant's. The applicant's 40 dBu interfering contour does not intersect with nor include any portion of the KOFK 60 dBu service contour. However, some degree of mutual interference is experienced. The licensee of KOFK-LP has filed for a full service facility but it is unknown if or when that application will be granted. Accordingly, the interference situation continues.

***Explanation of change to a channel outside the minor change limits and concomitant waiver request for major change:*** The within application proposes a change to previously granted channel 226, located nearby (only 17 km distant) but which was recently vacated by application BNPL-20131112BNM, whose applicant had requested that it be made available to another application pursuant to the letters attached to this exhibit. The within application changes only the FM channel which is known to be available and in a noninterfering situation with respect to any other FM facility at this location. The change from FM channel 252 to 226, while a major change, is requested via waiver because it is known to be available to the applicant and was suggested by the permittee, Three Forks Public Schools, for use by the applicant in order to promptly eliminate any risk of interference between the applicant and the licensee of KOFK-LP, the Guild of St. Peter Educational Association. The within application, if granted, will be promptly constructed and thus become the quickest way to alleviate interference issues and continue to provide service to the public depending on both facilities. Additionally, the within waiver request is entirely noncontroversial and is thus offered in the interest of service to the public.

### 2. The changes, by Section and Question Number, are as follows:

Section I - General information, Question 3.  
Application purpose is Major Change in Licensed Facility  
City of Application remains Manhattan, MT.  
Section V - Certification.

Application signing date revised to current.

Section VI - LPFM Engineering Tech Box Questions:

1. Channel revised from 252 to 226.
2. Antenna location coordinates remain the same as licensed for KPWS-LP.
3. All other technical details remain the same as for KPWS-LP.
4. Exhibit connected with this question added to discuss Major Change request.
5. Preparer's Certification date is changed to current.

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**3. Other revision information.**

The previously filed Manhattan School District #3 **Educational Exhibit** remains unchanged from the current status of the license for KPWS-LP.

**Nearby FM translator or booster stations whose input or output channels would be affected by the within application:** None found.

**Nearby AM radio stations whose coverage pattern would be affected by the installation of the proposed antenna on an existing tower:** None

**Canadian and Mexican stations near enough to be affected:** None

**Nearby IF relationships:** None.

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**Environmental issues:**

Antenna structure is not within 8 km of any airport.

NIER of within application less than 5% of the limit for its service; checklist confirmed.

Respectfully submitted,



James R. McDonald  
August 28, 2015

Following attachments:

- Allocation Study materials
- Letter from Manhattan Public Schools
- Letter from Three Forks Public Schools
- Email from Telesystem Svcs outlining problem that the within application solves

Allocation study Materials... Nearby Co- and 1, 2, 3rd adjacent channels:

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## Manhattan, MT

Call	Channel	Class	Frequency	Status	City	State	Country	File Number	Docket	Dist (km)
FacilityID	ERP	Service	HAAT	RCAMSL	RCAGL	Latitude	Longitude	ASRN		
Dist(mi) Azimuth Licensee/Permittee										
<a href="#">KMEA-LP</a>	224 L1 FL	92.7 MHz	LIC		BOZEMAN	MT	US	BLL-20090127AAA	-	<a href="#">135715</a>
0.1 kW	-70.5 m	1510. m	16. m	N 45 39 45.00	W 110 59 54.00	-	34.01 km	21.13 mi	130.97°	
GALATIN CHRISTIAN EDUCATION STATION										
<a href="#">NEW</a>	226 L1 FL	93.1 MHz	CP		THREE FORKS	MT	US	BNPL-20131114BAA	-	<a href="#">195488</a>
0.1 kW	-4.5 m	1304.2 m	8.2 m	N 45 52 39.00	W 111 32 3.00	-	16.07 km	9.98 mi	275.76°	
THREE FORKS SCHOOL DISTRICT #24										
<a href="#">K227CC</a>	227 D FX	93.3 MHz	CP		BOZEMAN	MT	US	BNPFT-20130806ABV	-	<a href="#">152576</a>
0.25 kW	2.5 m	1513. m	69. m	N 45 40 35.00	W 111 8 32.00	<a href="#">1225064</a>	25.31 km	15.73 mi		
145.15° EDGEWATER BROADCASTING, INC.										
<a href="#">KOBBS-FM</a>	229 C1 FM	93.7 MHz	LIC		BOZEMAN	MT	US	BLH-20090603ABH	-	<a href="#">16776</a>
51. kW	-39. m	1644. m	67. m	N 45 36 58.00	W 111 5 16.00	<a href="#">1044246</a>	33.24 km	20.65 mi	145.73°	
REIER BROADCASTING COMPANY, INC.										
<a href="#">KOBBS-FM</a>	229 C1 FA	93.7 MHz	USE		BOZEMAN	MT	US	---	-	<a href="#">16776</a>
- kW	- m	- m	- m	N 45 41 35.00	W 110 58 50.00	-	33.00 km	20.51 mi	124.93°	-

\*\*\* 5 FM Records within 50.00 km distance of 45° 51' 47.60" N, 111° 19' 41.80" W \*\*\*

**MANHATTAN  
PUBLIC SCHOOLS**SCOTT M. CHAUVET, *Superintendent*NEIL J. HARVEY, *High School Principal*ANN M. HEISLER, *District Clerk*SCOTT R. SCHUMACHER, *Elementary Principal****Enter Here to Learn. Go Forth to Serve.***

To: FEDERAL COMMUNICATIONS COMMISSION

From: MANHATTAN SCHOOL DISTRICT #3

Date: AUGUST 20, 2015

Subject: REQUEST FOR CHANGE OF FREQUENCY  
KPWS-LP FAC ID: 195503

The Manhattan School District #3 would like to request a change of frequency for our low power Radio Station from 98.3 to 93.1 mHz.

A religious Radio Station, KOFK-LP, close by in Bozeman is on the same frequency and is interfering with our radio reception within our School District where we would like parents and students to be able to receive our station. We are also receiving calls from KOFK listeners that we are blocking their reception as well.

The previous Superintendent, whom I just replaced, had received calls from KOFK personnel complaining about the potential loss of listeners if we went on the air, but we understood that they were awaiting authorization to move to a different frequency with more power. We waited as long as we could before going on the air hoping they would complete their move beforehand. It does not appear they have received authorization to move, or are very willing to move. Rather than having a conflict we would like to request a move to 93.1 mHz to eliminate the interference problem and prevent further hard feelings.

It seems to me that the cost of the frequency move should not have to be absorbed by the School District. I believe this so due to the fact the FCC assigned us this frequency and it conflicted with another neighboring area entity.

Thank you for your consideration of this request.

Sincerely,

Scott Chauvet  
Superintendent

# THREE FORKS PUBLIC SCHOOLS

School District No. J-24 . 212 East Neal . Three Forks, MT 59752

Robert DoBell, Ed.D. Superintendent 285-6830  
Steve Fanning, Elementary Principal 285-6830  
Randi Strickland, District Clerk 285-6830  
Laurie Mack, Elementary Secretary 285-6830  
Elementary Fax 285-3216



**We Are Respectful  
We Are Safe  
We Are Responsible  
We Graduate!**

**We are Wolves!**

Justin Helvik, High School Principal 285-3224  
Gayla Sieler, High School Secretary 285-3224  
Paula McDonald, Middle School Secretary 285-3224  
Dale Kober, Board Chairperson 285-3153  
High School Fax 285-3503

To: FEDERAL COMMUNICATIONS COMMISSION

From: THREE FORKS SCHOOL DISTRICT #24

Date: August 18, 2015

Subject: Cancellation of Construction Permit

Facility ID number: 195488

The Three Forks School District #24 did not get our Bond issue passed by the voters and therefore we will not be able to build the Low Power FM station on 93.1 mHz we had been planning. You may cancel our Construction Permit.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Rt DoBell", written over a horizontal line.

Superintendent

In collaboration with our community, the core purpose of the Three Forks Public School District is to be the model of excellence in education by using best practices, meeting the needs of every student, and instilling a love of lifelong learning.

**Jim McDonald**

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**From:** "B. W. St. Clair" <stcl@comcast.net>  
**Date:** Wednesday, August 05, 2015 2:54 PM  
**To:** "Jim McDonald" <jim@windriverbroadcast.com>  
**Subject:** Fw: Change of Frequency for Manhattan, MT

**From:** Telesystem Services  
**Sent:** Wednesday, August 05, 2015 2:12 PM  
**To:** Susan Hanson  
**Subject:** Change of Frequency for Manhattan, MT

Hi Susan,

Could you have someone file for a change of frequency for Manhattan, MT KPWS-LP? They are at 98.3 mHz now and need to go to 93.1 mHz. This frequency appears to be available on the FCC Channel Finder and should meet all the spacing requirements per the FCC Channel finder. Three Forks has a Construction Permit for 93.1 but I met with them yesterday and they are not going to activate it, it expires on the 19th of August anyway.

The Catholic Radio Channel KOFK is on 98.3 mHz out of Bozeman. They are awaiting a modification from the FCC that would allow them to move from LPFM and go to a higher power at 88.7mHz but I don't think its going to happen anytime soon as they have been waiting for quite a while. Even if they get the mod granted it will probably take them a period of time to move. At the moment, both stations are interfering with each other between the two communities and neither getting the coverage they expected. Listeners from further out than Manhattan are calling the school complaining the they lost their religious channel they were listening to.

In my opinion the easiest solution and fastest solution is for KPWS to move. As we have a broadband antenna it won't take long to make the move.

The new Superintendent at Manhattan is Scott Chauvet replacing Jim Notaro. Please invoice them for your time.

Thanks

Lee



This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)

8/9/2015