

Albert David  
2632 Kenilworth Ave., Berwyn, IL. 60402  
708-921-8091

March 1, 2022

Federal Communications Commission  
Washington D.C. 20554

cc: Jeff Sibert  
3340 Utah Ave S  
St Louis Park, MN 55426  
and via email to: [jeff@parkpublicradio.org](mailto:jeff@parkpublicradio.org)

Re: Park Public Radio, Inc.'s Application for new NCE FM Construction Permit  
File No. 0000167197  
Facility ID No. 768430  
Informal Objection

Good morning,

I am writing to file an informal objection to Park Public Radio, Inc.'s application for a construction permit for a new Noncommercial Educational FM station in Owatonna, Minnesota.

In their application, Park Public Radio, Inc. responded yes to both fair distribution of service questions, certifying that the applied for station would “provide first noncommercial aural service to (a) at least 10 percent of the people residing within the station's 60 dBu (1mV/m) service contour and (b) to a minimum of 2,000 people.” and that it would “provide a second noncommercial aural service, or an aggregated first and second noncommercial educational aural service, to (a) at least 10 percent of the people residing within the station's 60 dBu (1mV/m) service contour and (b) to a minimum of 2,000 people.” To establish their fair distribution position, the applicant claimed in its attachment titled “Fair Distribution and Points Analysis - Owatonna.pdf” that it would provide first service coverage to 7,422 people and combined first and second service coverage to 42,739 people. However, in the map that they provided to support their claims, the applicant failed to include KMSU (Facility ID: 39790), a Noncommercial Educational FM station in Mankato, Minnesota, which has coverage overlap with the applied for facility. The areas where there is coverage overlap are shaded in the applicant's map as areas where the applied for facility would provide second noncommercial aural service.

To illustrate the overlap between KMSU and Park Public Radio's applied for facility,

screenshots of the FCC's 60 dBu coverage maps of Park Public Radio's applied for facility and KMSU are included below.

As a result of this error, the population figures that were supplied are unreliable and are not acceptable to use as support for establishing the applicant's fair distribution position.

Sincerely,

*Albert David*

Albert David

Facility Details « Licensing | Facility Details « Licensing X

enterpriseefiling.fcc.gov | Facility Details « Licensing and Management System Admin « FCC

Facility ID: 768430 | Channel: | Station Type: Main | Community: OWATONNA, MN | Print | Help

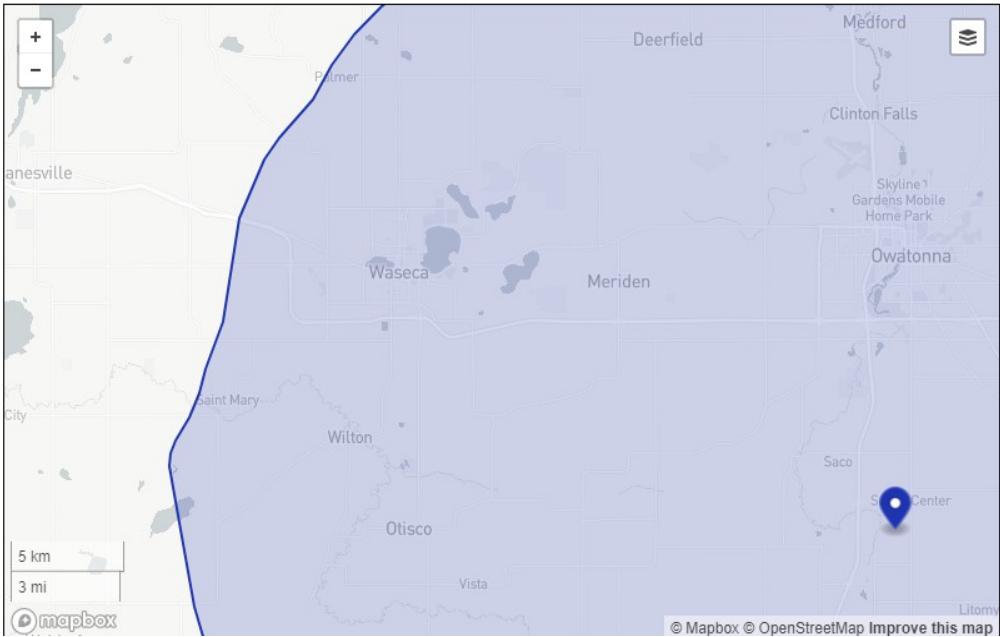
« Back To Search Results

FACILITY DETAILS | FACILITY TECHNICAL DATA

### Application Technical History

Application	Submit Date
0000167197 New NCE FM CP Amendment Pending, Active Status Date: 11/09/2021	11/09/2021
0000167197 New NCE FM CP Superseded, In-Active Status Date: 11/09/2021	11/09/2021

### Contour Map



KMSU

Channel: 209 | Station Type: Main | Community: MANKATO, MN

« Back To Search Results

- FACILITY DETAILS
- FACILITY TECHNICAL DATA

Application Technical History

Application	Submit Date
<b>BLED-20091202ABZ</b> License To Cover Granted, Active Status Date: 01/05/2010	12/02/2009
<b>BPED-20070907AED</b> Minor Modification Granted, In-Active Status Date: 10/10/2007	09/07/2007
<b>BMPED-19851115II</b> Minor Modification Granted, In-Active Status Date: 04/22/1986	11/15/1985
<b>BLED-19850812KH</b> License To Cover Granted, In-Active Status Date: 09/22/1987	08/12/1985
<b>BLED-19820125AS</b> License To Cover Granted, In-Active Status Date: 10/28/1982	01/25/1982

Contour Map

