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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

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 ID: 768430
Channel: Station Type: Main Community: OWATONNA, MN

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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 Superceded, In-Active Status Date: 11/09/2021	11/09/2021

Contour Map

Map showing coverage area (blue shaded region) around Owatonna, MN. Locations labeled include Deerfield, Medford, Clinton Falls, Skyline Gardens Mobile Home Park, Owatonna, Meriden, Waseca, Wilton, Otisco, Vista, Saco, and Center. Scale: 5 km, 3 mi. © Mapbox © OpenStreetMap Improve this map

KMSU

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

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- FACILITY DETAILS
- FACILITY TECHNICAL DATA**

Application Technical History

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

Contour Map

