

February 21, 2002

William Caton, Acting Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, NE  
Suite 110  
Washington, DC 20002

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FEB 22 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WMLS FM, Grand Marais, MN  
Facility ID No. 92306  
Minnesota Public Radio  
Request for Extension of Special Temporary Authority

WLSN FM, Grand Marais, MN  
Facility ID No. 92302  
Minnesota Public Radio  
Request for Special Temporary Authority

Dear Mr Caton:

On behalf of Minnesota Public Radio ("MPR"), holder of construction permits for WMLS- FM, Grand Marais, MN, and of WLSN-FM of Grand Marais, MN, this is to request Special Temporary Authority to operate at variance from the stations' construction permit parameters due to a variety of technical problems described below.

The original construction permit for WMLS -FM was issued June 16, 2000, FCC Permit File Number BPED-19981208MI. The original construction permit for WLSN - FM was issued June 9, 2000, FCC Permit File Number BPED-19981204MB. Thus, the construction permits in question expire June 16, 2003 and June 9, 2003 respectively.

By separate letters for each station dated September 13, 2001, MPR advised the Commission that it expected to begin program tests on or about September 17, 2001. In separate letters for each station, in letters dated September 26, 2001, October 25, 2001, November 26, 2001 and February 7, 2002 (copies attached) MPR advised the Commission that it had begun program tests, but was experiencing technical difficulties since commencing operations and is operating both stations at substantially reduced power.

The tower on which the WMLS and WSLN transmitters were built on is owned by another party, who completed construction of the tower just days before MPR began program tests of WMLS and WSLN.

The WMLS/WSLN antenna is mounted on a tower that is also used to house translators for TV channels 3, 6, and 8. These translators receive their signals through a diamond-quad Yagi antenna array from Duluth, Minnesota, which is located 110 miles south of Grand Marais. Because of the extreme distance involved, these off the air signals are extremely low in level. These signals are also used to feed a local cable TV system. The diamond-quad antenna is located 50 feet below the WMLS/WSLN antenna.

When the WMLS and WSLN transmitters were put on the air in September, 2001, it was found that there was moderate to severe interference caused to the channel 6 translator receive signal; the other TV signals were not affected. Extensive testing revealed that there were several causes of the interference to channel 6, the primary one being poor tower grounding and poor or no bonding of tower sections. The WMLS/WSLN broadcast antenna was found to have been installed without being grounded to the tower, and the diamond-quad off air pickup antenna was also found to be ungrounded.

On the 20<sup>th</sup> of November, 2001, both the WMLS and the WSLN transmitters were turned on and operated at a TPO such that they were each producing their authorized ERP of 6 Kilowatts. The two stations were operated at this power level for several hours. During that period coverage area was verified, as was the stability of the broadband antenna and transmitter combiner. Both transmitters were found to be operating very close to factory test specifications for their TPO. Also, both transmitters were thoroughly tested for the presence of intermodulation products and second harmonics; the combiner output was found to be very clean with both intermodulation products and harmonics better than 100 dB below carrier levels.

At MPR's expense, a multi cavity filter was installed on the off air pickup antenna's downlead, and a tower crew was hired to properly bond the WMLS/WSLN antenna to the tower, and to bond several of the tower sections together. These actions drastically improved the channel 6 reception, but it was then found that the diamond-quad receive antenna was itself generating an intermodulation product that fell on the channel 6 aural carrier frequency. At present, MPR is waiting for the tower owner to have this antenna repaired. When this antenna is repaired, the WMLS/WSLN stations should be able to operate at full power. As an accommodation to the licensee of the channel 6 translator, MPR is continuing to temporarily operate WMLS and WSLN at reduced power.

MPR therefore respectfully requests Special Temporary Authority for WMLS and WSLN to continue program tests at substantially reduced power for another six (6) months.

William Caton  
February 21, 2002  
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Because MPR is a noncommercial, educational licensee, no filing fee is required with this request. An Anti-Drug Abuse Act Certification form is attached.

Please contact this office or our outside counsel, Todd Stansbury at Wiley Rein & Fielding (202) 719-7000, if there are any questions.

Sincerely,

A handwritten signature in cursive script that reads "Mitzi T Gramling".

Mitzi T Gramling  
Associate General Counsel

**Exhibit**

**Anti-Drug Abuse Act Certification**

The applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §853a, or, in the case of a non-individual applicant (eg corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. §1.2002 (b).

Yes [ X ]

No [ ]

Minnesota Public Radio

  
\_\_\_\_\_  
Thomas J Kigin, Executive Vice President

2-21-02  
\_\_\_\_\_  
Date



Wiley Rein & Fielding LLP

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SEP 13 2001

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September 13, 2001

BY HAND DELIVERY

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
12th Street Lobby, TW-A325  
Washington DC 20554

Eve J. Klindera  
202.719.7404  
eklinder@wrf.com

Re: **WMLS(FM), Grand Marais, Minnesota (Facility Id. No. 92306)**  
**Notification of Commencement of Equipment and Program Tests**  
**FCC File No. BPED-19981208MI**

Dear Ms. Salas:

Minnesota Public Radio ("MPR"), the permittee of WMLS(FM), Grand Marais, Minnesota, hereby advises the Commission that it expects to commence equipment tests on or about September 17, 2001 with the facilities authorized in BPED-19981208MI. Shortly thereafter, MPR expects to begin operating under program test authority pursuant to Section 73.1620(a)(1) of the FCC's Rules.

If there are any questions concerning this matter, please contact the undersigned or Todd Stansbury at 202.719.4948.

Respectfully submitted,

Eve J. Klindera

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September 26, 2001

SEP 26 2001

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Todd M. Stansbury  
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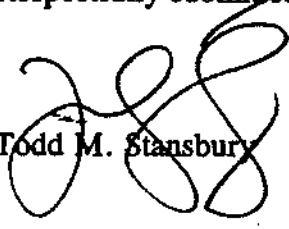
**Re: WMLS(FM), Grand Marais, Minnesota (Facility Id. No. 92306)  
Notification of Reduced Power Operation  
FCC File No. BPED-19981208MI**

Dear Ms. Salas:

By letter dated September 13, 2001, this office advised the Commission that Minnesota Public Radio ("MPR"), permittee of WMLS(FM), Grand Marais, Minnesota, intended shortly to commence program tests with the facilities authorized in File No. BPED-19981208MI. MPR began service as expected, but encountered equipment problems, which have required MPR to reduce operating power to approximately thirty percent of authorized ERP. MPR expects that full-power service will be restored within approximately thirty days and will file the application for license to cover the construction permit at that time.

Please contact this office if there are any questions.

Respectfully submitted,

  
Todd M. Stansbury



Wiley Rein & Fielding LLP

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October 25, 2001

OCT 25 2001

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Washington DC 20554

Re: WMLS(FM), Grand Marais, Minnesota (Facility Id. No. 92306)  
Notification of Continued Reduced Power Operation  
FCC File No. BPED-19981208MI

Dear Ms. Salas:

By letter dated September 26, 2001, this office, on behalf of Minnesota Public Radio ("MPR"), advised the Commission that WMLS(FM), Grand Marais, Minnesota, encountered technical difficulties shortly after commencing program tests with the facilities authorized in File No. BPED-19981208MI. MPR has since ordered necessary equipment and made progress in correcting the problems, but will need additional time to complete repairs. Based on the latest information provided by the manufacturer, the station should resume full-power operations within the next thirty days, and an application for a license to cover the construction permit should be filed at that time.

Please contact this office if there are any questions.

Respectfully submitted,

  
Todd M. Stansbury

cc: Mitzi T Gramling, Esq.



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November 26, 2001

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Re: **WMLS(FM), Grand Marais, Minnesota (Facility Id. No. 92306)**  
**Notification of Continued Reduced Power Operation**  
**FCC File No. BPED-19981208MI**

Dear Ms. Salas:

By letters dated September 26, 2001 and October 25, 2001, this office, on behalf of Minnesota Public Radio ("MPR"), advised the Commission that WMLS(FM), Grand Marais, Minnesota, encountered technical difficulties shortly after commencing program tests with the facilities authorized in File No. BPED-19981208MI. MPR has since installed necessary equipment, solved some of the problems, and made progress in correcting remaining issues, but will need additional time to complete repairs. MPR currently anticipates that the station should resume full-power operations within the next sixty days, and an application for a license to cover the construction permit should be filed at that time.

Please contact this office if there are any questions.

Respectfully submitted,

Todd M. Stansbury

cc: Mitzi T Gramling, Esq.





Wiley Rein & Fielding LLP

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February 7, 2002

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FEB 07 2002

FEDERAL COMMUNICATIONS COMMISSION  
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Suite 110  
Washington, DC 20002

**Re: WMLS(FM), Grand Marais, Minnesota (Facility Id. No. 92306)  
Notification of Continued Reduced Power Operation  
FCC File No. BPED-19981208MI**

Dear Mr. Caton:

On behalf of Minnesota Public Radio ("MPR"), this is to advise the Commission that WMLS(FM), Grand Marais, Minnesota, has continued to experience technical difficulties since commencing program tests with the facilities authorized in File No. BPED-19981208MI and, as a result, is operating at substantially reduced power. Despite making certain repairs, MPR has not yet been able to restore full power operations, and additional study will be needed to determine what additional steps will be required. Accordingly, MPR now expects that normal operations could resume, and the application for license could be filed, within the course of the next six months.

Please contact this office if there are any questions.

Respectfully submitted,

  
Eve J. Klindera

cc: Mitzi T Gramling, Esq.