## FEDERAL COMMUNICATIONS COMMISSION 445 TWELFTH STREET SW WASHINGTON DC 20554

MEDIA BUREAU AUDIO DIVISION APPLICATION STATUS: (202) 418-2730 HOME PAGE: www.fcc.gov/mb/audio/ ENGINEER: Ann Gallagher TELEPHONE: (202) 418-2716 FACSIMILE: (202) 418-1410 E-MAIL: Ann.Gallagher@fcc.gov

November 10, 2011

Anne Goodwin Crump Fletcher, Heald & Hildreth, P.L.C. 1300 North 17<sup>th</sup> Street 11<sup>th</sup> Floor Arlington, VA 22209

> Re: KPMI(AM), Bemidji, MN Facility Identification Number: 160495 Paskvan Media, Inc. Construction permit: BNP-20050118AFR License application: BMML-20111018ATE

Dear Counsel:

This is in reference to the license application to cover the above-captioned construction permit and the request for program test authority ("PTA") for KPMI.

After initial review of the license application, we note that the application does not include a postconstruction survey verifying that the towers are within the allowable tolerance of the locations specified on the construction permit, as required by Section 73.151(c)(1)(ix). Please submit the required survey.

As noted in the engineering exhibit, KPMI is co-located with station KKBJ, Bemidji, Minnesota (Facility Id No. 9665). KPMI uses two of the three towers at the site. The moment method model used to determine individual tower impedances and to calculate the current moments and operating parameters for KPMI's authorized night pattern includes only the two towers used by KPMI, ignoring the third tower. Please submit new moment method studies which include all towers.

In addition, please submit the following information regarding the diplexed operation with KKBJ:

- 1) A copy of a firm agreement between the two co-located stations clearly fixing the responsibility of each with regard to the installation and maintenance of diplexing equipment.
- 2) The results of field observations made to evaluate spurious emissions. Also, please describe measures taken to verify that KKBJ continues to operate in accordance with the terms of its license.

3) A circuit diagram of diplexing equipment indicating where tower impedance measurements were made, and also showing the current sampling locations for KPMI.

Further action on the request for program test authority and on the subject license application will be withheld until the applicant submits an amendment addressing the deficiencies described above. Failure to respond within 60 days from the date of this letter may result in dismissal of the application pursuant to 47 CFR Section 73.3568(a)(1).

Sincerely, Ann Gallagher Audio Division

Media Bureau

Cc: Garrett G. Lysiak