

***VIA FEDERAL EXPRESS***

Attn: Mr. Phil Ramsey, Compliance Specialist  
Federal Communications Commission  
8800 E. 63rd Street, Room 320  
Kansas City, Missouri 64133

Re: The Curators of the University of Missouri  
Station KMNR-FM, Rolla, Missouri  
File No. 99KC296  
**Reply to Official Notice of Violation**

Dear Mr. Ramsey:

The Curators of the University of Missouri ("Curators"), licensee of noncommercial educational FM Station KMNR ("KMNR"), hereby submit an original and one copy of their reply to the Official Notice of Violation, File No. 99KC296, dated June 24, 1999.<sup>1</sup>

The Curators have reviewed the rule violations that were alleged in the Official Notice of Violation and present the following explanations and have taken the following corrective actions:

1. 47 C.F.R. § 11.52(d): Station KMNR's Emergency Alert System ("EAS") decoder/monitor is tuned to receive EAS activation and has been and is currently monitoring EAS activation from both KZNN-FM and the National Weather Service ("NWS"), the two EAS sources assigned to KMNR in the Missouri EAS Plan (see also response in para. 2 below).

2. 47 C.F.R. § 73.1820(a)(1)(C)(iii), § 11.35(a) and § 11.61(b): At the time of the inspection, Station KMNR was using the EAS tapes as a station record of the EAS tests it received from its monitored stations. KMNR is now recording the EAS tests it receives or fails to receive from these stations directly into the station log. Also, in May 1999, KMNR received weekly tests from the NWS and recorded each test into the station log, including the test it received the first week of May 1999. No monthly test from the NWS was recorded in the station log because KMNR did not receive one for May 1999, and, at that time, KMNR was not recording the non-receipt of tests or the reasons for these omissions in the station log. KMNR is now recording both the non-receipt

of EAS tests and the reasons for the non-receipt of EAS tests, including any corrective action taken, in the station log. Finally, KMNR receives very few of KZNN's EAS tests and, despite calls to

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<sup>1</sup> On June 30, 1999, the Curators requested and were granted an extension of time, until July 21, 1999, to submit this reply; therefore, this reply is timely filed.

KZNN, has not been successful in getting KZNN to take any action to correct this situation. KMNR has reported this situation to the regional EAS coordinator.

3. 47 C.F.R. § 73.267(c)(2)&(3): The Efficiency Factor is not required to determine the transmitter output power for Station KMNR because the station uses the direct method for power calculation, not the indirect method. The Efficiency Factor is only required when operating power is determined by the indirect method. *See* 47 C.F.R. § 73.267 (b) and (c). KMNR uses the remote control linked to the transmitter to determine output power. The transmitter is checked once a month using the direct method and the link between the remote and the transmitter is calibrated to accurately reflect the power output.

4. 47 C.F.R. § 73.3527(e)(9): The lists of donors supporting specific programs were readily available at the station but out of the public file at the time of the inspection. The lists have been placed in Station KMNR's public inspection file.

5. 47 C.F.R. § 73.1870(b)(3): The designation of Station KMNR's chief operator has been put in writing, and a copy of the designation has been posted with the station license.

6. 47 C.F.R. § 73.1870(c)(3): Station KMNR's station logs have always been reviewed at least once a week by the chief operator or by a person delegated by the chief operator. The logs are now reviewed at least once a week to ensure that required entries, including EAS tests, are being made correctly and then signed and dated as proof that they have been reviewed.

Respectfully submitted,

**THE CURATORS OF THE UNIVERSITY OF  
MISSOURI**

By: \_\_\_\_\_



Dennis P. Cesari  
Assistant Vice President  
Management Services

Its: \_\_\_\_\_

Dated: July 19, 1999