

DECLARATION OF FREDERICK MATTHEWS

I am the President of Peaches Productions Group, Inc.,
General Partner of Peaches Broadcasting, Ltd.

When Peaches filed its application, I set up its public file at the Baldwin City Hall. I have attempted to keep the public file complete by inserting into the file material sent periodically by Peaches' counsel which is marked "Public File." I have particularly attempted to insure that FCC orders in this case, and Peaches' pleadings, are contained in the file.

On June 3, I visited the City Clerk's office and examined all of the public files of applicants in this case. Ours was the largest file. Most were substantially complete. Some, such as that of White Broadcasting Partnership, did not include a few necessary items or contained extraneous material. White's amendments and pleadings relating to the EMI issue were not in White's file. A list of items White couldn't find in our file was contained in White's file.

I have inserted or reinserted into the file the pleadings which White's Motion to Enlarge noted that we didn't have. I understand that "The Public and Broadcasting" is out of print and not available. I do not know why all amendments to our application were not in the file when Charlie White reviewed it, since I have always placed Peaches' amendments in the file promptly after they are filed with the Commission.

I declare under penalty of perjury under the laws of the United States of America that the foregoing declaration is true and correct. Executed 4 June 91.


Frederick Matthews

CERTIFICATE OF SERVICE

I, David Honig, this 5th day of June, 1991, hereby certify that I have placed in U.S. First Class Mail, postage prepaid, a copy of the foregoing "Opposition to Motion to Enlarge Issues" addressed to the following:

Hon. Edward Luton
Administrative Law Judge
Federal Communications
Commission
2000 L Street N.W.
Washington, D.C. 20554

Y. Paulette Laden, Esq.
FCC Hearing Branch
2025 M Street N.W. #7212
Washington, D.C. 20554

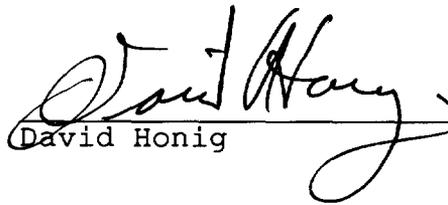
Denise B. Moline, Esq.
McCabe & Allen
9105 Owens Dr.
Manassas Park, VA 22111
Counsel for White

Office of the Chief Counsel
Federal Aviation Administration
800 Independence Ave. S.W.
Suite AGC-230
Washington, D.C. 20591

Arthur V. Belendiuk, Esq.
Smithwick & Belendiuk
2033 M Street N.W.
Washington, D.C. 20036
Counsel for Johnson

James L. Winston, Esq.
Rubin Winston & Diercks
1730 M St. N.W. #412
Washington, D.C. 20036
Counsel for Northeast

Avelino G. Halagao, Esq.
7799 Leesburg Pike #900
Falls Church, VA 22043
Counsel for JEM


David Honig