

ORIGINAL  
FILE

Before the  
Federal Communications Commission  
Washington, DC

RECEIVED

In the Matter of )  
Amendment of Section 202(b), )  
Table of Allotments, )  
FM Broadcast Stations )  
)  
(Eatonton, Sparta, Fayetteville, )  
Griffin, Hogansville, Greenville, )  
and Thomaston, Georgia) )

RM-

JUN 24 1992

Federal Communications Commission  
Office of the Secretary

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Good Medicine Radio, Georgia, Inc., licensee of Station WSKS(FM), Sparta, Georgia ("GMR"), and Design Media, Inc., licensee of Station WQUL(FM), Griffin, Georgia ("DMI"), hereby requests that the Commission amend the Table of Allocations as follows:

Eatonton, Georgia

<u>Present</u>	<u>Proposed</u>
None	249C3

Sparta, Georgia

249A, 274A	274A
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Fayetteville, Georgia

None	248C3
------	-------

Griffin, Georgia

249A	None
------	------

Hogansville, Georgia

248A	239A
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List A B C D E

044

Greenville, Georgia

239A

237A

Thomaston, Georgia

237A

266A

In support thereof, the following is stated:

1. Stations WQUL and WSKS originally requested the upgrade of their stations from Class A to Class C3 by petitions for rulemaking filed on September 28, 1989 and February 28, 1990, respectively. The petitions proposed to amend the FM Table of Allotments to substitute Channel 248C3 for Channel 249A at Griffin, Georgia, and Channel 249C3 for Channel 249A at Griffin, Georgia, both of which could be accommodated by substituting Channel 288A for Channel 249A at Hogansville, Georgia. The petitions for rulemaking were adopted by the Commission (Notice of Proposed Rule Making, 5 FCC Rcd 3769 (1990)) and comments were accepted with regard to the proposals. By Report and Order, 6 FCC Rcd 4863 (1991), the FCC declined to adopt the proposals, and instead adopted a counterproposal to allot Channel 288A to Bowdon, Georgia. A petition for reconsideration of that action is pending.

2. This petition, which is being filed jointly by GMR and DMI, again requests the amendment of the Table of Allotments to allow them to apply for Class C3 facilities on co- or adjacent frequencies, pursuant to 47 C.F.R. § 1.420(g). This can be accomplished by substituting Channel 239A for Channel 248A at Hogansville, Georgia; Channel 237A for Channel 239A at

Greenville, Georgia; and Channel 266A for Channel 237A at Thomaston, Georgia. As seen in the attached Engineering Statement, each of the proposed substitutions can be made in full accord with the Commission's Rules. Two existing stations will be affected: Station WEIZ(FM), Hogansville, Georgia, and Station WTGA(FM), Thomaston, Georgia. As seen in Attachment 2, both licensees have consented to the substitutions. Current Channel 239A, Greenville, Georgia is a vacant but applied-for allotment. As seen in Attachment 1, Exhibit 7, an area exists at which the existing applicants can amend their applications in order to comply with the minimum separation requirements with respect to the proposed modification. Since their currently proposed sites are regarded as mere site preferences under the Commission's current policies, the applicants will be required under Commission policy to amend their applications to specify new transmitter sites. Andalusia, Alabama, 49 Fed. Reg. 32201 (Aug. 13, 1984). See also, Conflicts Between Applications and Petitions for Rulemaking to Amend the FM Table of Allotments, 6 FCC Rcd 7346, 7347 ¶ 5 (1991).

3. Moreover, GMR and DMI each are proposing to change their cities of license pursuant to Section 1.420(i) of the Commission's Rules. GMR is proposing to amend the city of license of its FM assignment from Sparta, Georgia to Eatonton, Georgia. The proposed allotment is mutually-exclusive with GMR's present allotment, as required by Section 1.420(i) of the Commission's Rules. Approval of this proposal will provide the

community of Eatonton (a community with a population larger than Sparta's) with its first full-time local service,<sup>1/</sup> without depriving Sparta of full-time local service.<sup>2/</sup> As seen in Attachment 1, Eatonton has all of the indicia necessary to warrant the allotment of an FM channel to the community. Under the Commission's allotment criteria, allotting Channel 248C3 to Eatonton, in order to provide that community with first full-time service, is preferable over keeping it assigned to Sparta as its second full-time local service. Thus, under the Commission's allotment criteria, allotting Channel 248C3 to Eatonton rather than Sparta will result in a preferential arrangement of allotments. In these circumstances, the Commission has stated that it will permit a change of city of license. Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 66 R.R.2d 877, 882 (1991).

4. Similarly, DMI is proposing to amend the city of license of its FM assignment from Griffin, Georgia to Fayetteville, Georgia. The proposed allotment is mutually-exclusive with GMR's present allotment, as required by Section 1.420(i) of the Commission's Rules. Fayetteville currently has no local aural service, while Griffin, Georgia already also has licensed to it full-time stations WHIE(AM) and WKEU(AM). Thus,

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<sup>1/</sup> The only station currently licensed to Eatonton is AM daytime-only station WKVQ(AM).

<sup>2/</sup> Sparta will continue to be served by WHAN(FM), which is a full-time FM station, and is licensed to Sparta.

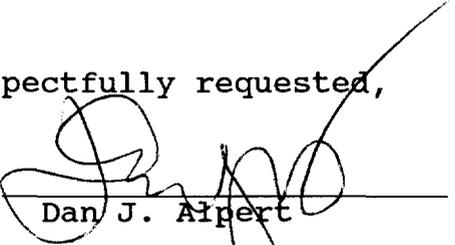
under the Commission's allotment criteria, allotting Channel 248C3 to Fayetteville rather than Griffin will provide Fayetteville with its first full-time local service, but will not deprive Griffin of local full-time service, thereby creating a preferential arrangement of allotments. This also is in accord with Commission policy for permitting a change of city of license. Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 66 R.R.2d 877, 882 (1991).

5. Therefore, this proposal will be in full accord with the Commission's rules and policies, and is in the public interest insofar as it will allow for new and improved service to the public, without requiring the Commission to reconsider its decision in MM Docket No. 90-309. Upon final grant of this proposal, the Commission will be able to dismiss DMI's petition for reconsideration in that proceeding as moot, thus allowing an allotment which will provide for first local service at Bowdon, Georgia to be retained.

WHEREFORE, it is respectfully requested that this Petition be adopted, and the Commission request comment on the proposals proposed herein.

Respectfully requested,

By:

  
Dan J. Alpert

Counsel for Good Medicine  
Radio, Georgia, Inc. and  
Design Media, Inc.

GINSBURG, FELDMAN & BRESS,  
Chartered  
1250 Connecticut Ave., N.W.  
Washington, DC 20036

June 24, 1992

**ATTACHMENT 1**

PETITION FOR RULE MAKING  
GOOD MEDICINE RADIO, GA, INC.  
& DESIGN MEDIA, INC.  
NUMEROUS COMMUNITIES  
IN THE STATE OF GEORGIA  
June 1992

Technical Exhibit

TE-1

Bromo Communications, Inc.  
P.O. Box M - 1331 Ocean Boulevard, Suite 201  
St. Simons Island, Georgia 31522  
(912) 638-5608

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PETITION FOR RULE MAKING  
GOOD MEDICINE RADIO, GEORGIA, INC.  
SUBSTITUTE CH 249C3 FOR CH 249A  
RE-ALLOT CH 249C3 TO EATONTON, GEORGIA  
DESIGN MEDIA, INC.  
SUBSTITUTE CH 248C3 FOR CH 249A  
RE-ALLOT CH 248C3 TO FAYETTEVILLE, GEORGIA  
June 1992

TECHNICAL STATEMENT

1. This Petition for Rule Making was prepared on behalf of Good Medicine Radio, Georgia, Inc. ("GMRGI"), licensee of Radio Station WSKS, Channel 249A, Sparta, Georgia and Design Media, Inc. ("DMI"), licensee of Radio Station WQUL, Channel 249A, Griffin, Georgia, referenced to jointly as "Petitioners". The petitioners seek to upgrade their respective facilities by first substituting Channel 249C3 for Channel 249A at Sparta, Georgia and re-allotting the improved channel to Eatonton, Georgia.

2. In order to accommodate the Sparta/Eatonton proposal, it is necessary to substitute Channel 248C3 for Channel 249A at Griffin, Georgia. The Petitioners further request that the improved channel then be re-allotted to Fayetteville, Georgia. In order to allow the Griffin/Fayetteville upgrade, it is necessary to substitute channels at Hogansville, Greenville and Thomaston (all Georgia), as described further below.

3. The Commission generally refrains from adopting a Rule Making petition that proposes to make more than two changes in channels which affect authorized facilities other than the petitioners. In this case, three additional substitutions are required, but of the three requested changes, only two affect Commission authorized facilities (Hogansville and Thomaston). The third (Greenville) is a vacant, but applied for channel. It should be noted, as will be discussed later, that the permittee at Hogansville and licensee of the Thomaston facility have each consented to the herein requested changes.

#### BACKGROUND

4. In September 1989, a Petition for Rule Making was filed by DMI to upgrade WQUL from Channel 249A to Channel 248C3 at Griffin, Georgia. Subsequent to the issuance of a Notice for Rule Making, a second petition filed by Alexander-Mitchell Communications Corporation ("AMCC"), the former licensee of WSKS, sought to upgrade WSKS to Channel 249C3 from Channel 249A at Sparta, Georgia. The AMCC request also required the substitution of Channel 248C3 for Channel 249A at Griffin, Georgia. Both requests required the substitution of Channel 288A for Channel 248A at Hogansville, Georgia. The Commission released the Notice in MM Docket #90-309 on June 22, 1990.

5. A counterproposal was filed to allot Channel 288A to Bowdon, Georgia as first local service, rather than as a substitute Channel at Hogansville. In replies, DMI and AMCC suggested that Channel 223A be allotted to Bowdon, Georgia<sup>1</sup> rather than Channel 288A. This alternate channel would have removed the conflicts in the docket, thus potentially allowing for the upgrades at Sparta and Griffin.

6. The Report and Order ("R&O") in MM Docket #90-309, DA 91-987 (August 14, 1991) denied the DMI and AMCC requests and allotted Channel 288A to Bowdon, Georgia. The R&O noted that the alternate Channel for Bowdon could not be accommodated due to shortspacing with other Commission authorized facilities.<sup>2</sup> DMI and AMCC petitioned for reconsideration of the order. The petition remains pending before the staff.

7. This instant petition again requests the upgrade of WSKS and WQUL, and still requires the change of allotment at Hogansville, Georgia, which will be accomplished through newly proposed means. The requests contained in this petition when granted and filed will obviate the need for reconsideration of the matter in Docket #90-309.

<sup>1</sup> DMI urged that Channel 223A be allotted to Bowdon, Georgia under former §73.207 rules since its proposed upgrade and other requested substitutions were filed prior to October 2, 1989.

<sup>2</sup> The dismissal of DMI's alternate channel for Bowdon was based on current the §73.207 six kilowatt spacing requirements.

## GENERAL OVERVIEW

8. The petitioners request that Channel 249C3 be substituted for Channel 249A at Sparta, Georgia. Further, the upgraded channel be re-allotted from Sparta to Eatonton, Georgia. In order to accommodate the upgrade at Sparta/Eatonton, it is requested that Channel 248C3 be substituted for Channel 249A at Griffin, Georgia and the upgraded channel be re-allotted to Fayetteville, Georgia.

9. It is further requested that Channel 239A be substituted for Channel 248A at Hogansville, Georgia, in order to allow the proposed substitution at Griffin/Fayetteville.

10. The use of Channel 239A at Hogansville requires the substitution of Channel 237A for Channel 239A at Greenville, Georgia. Presently, there are three pending applications for Channel 239A at Greenville. In order to accommodate the substitution at Greenville, it is further necessary to substitute Channel 266A for Channel 237A at Thomaston, Georgia.

## PROPOSAL

11. The petitioners ask that §73.202(b) of the Commission's rules be amended as outlined below. It is requested that Channel 249C3 be substituted for Channel 249A at Sparta, Georgia and that the improved channel be re-allotted to Eatonton, Georgia as that community's first local full time aural service. Channel 249C3 can be allotted to Eatonton at reference coordinates North Latitude 33° 23' 03" and West Longitude 83° 19' 22". These coordinates represent a site restriction 8.8 kilometers northeast of the community to avoid shortspacing WKXK, Channel 250C3, Fort Valley, Georgia. A 3.16 mV/m signal will be delivered to all of Eatonton from the reference site.

12. Exhibit #1 is a Usable Area Study which visually demonstrates the area in which to locate a transmitter site for Channel 249C3 at Eatonton. Exhibit #2 demonstrates that Channel 249C3 meets present §73.207 spacing requirements to all other Commission authorized, applied for or proposed facilities.

13. The usable area and spacing analysis assume that Channel 249A at Griffin, Georgia has been deleted in favor of Channel 248C3 at Fayetteville, Georgia, as proposed below. Channel 249C3 at Eatonton is mutually exclusive with the present Channel 249A allotment at Sparta.

14. Presently, Eatonton has one local licensed AM daytime station WKVQ, operating on 1520 kHz. The community does not have any local FM service.<sup>3</sup> Based on 1990 census figures, Eatonton, an incorporated city, has a population of 4,737 persons while Sparta has population of only 1,710 persons. Sparta presently has one other authorized FM service, WHAN, Channel 274A. The re-allotment of Channel 249C3 to Eatonton would therefore not deprive Sparta of its only local full time service and would provide Eatonton, a larger community, with its first authorized full time service. Sparta will continue to receive 1.0 mV/m service from the upgraded channel at Eatonton.

15. Eatonton has a mayor and seven member city council. The city provides its own police protection and has its own post office. Eatonton has a volunteer fire department which is supported by the city and, in part, the county. There are numerous businesses, financial institutions and residential areas in the city. Eatonton also has a variety of civic organizations such as Lions Clubs, Mason Lodge and Elks Club in the community. Eatonton has all the necessary community identia to warrant the allotment of an FM channel.

<sup>3</sup> In MM Docket #89-585, Steven D. King ("King"), requested the allotment of Channel 262A to Eatonton, Georgia. However, King withdrew his interest in the Eatonton channel during the comment period in that docket. A late expression of interest was filed for the Eatonton channel, but since it was not filed in a timely manner, the Commission did not allot Channel 262A to Eatonton.

16. Channel 248C3 can be substituted for Channel 249A at Griffin, Georgia and the new channel can be re-allotted to Fayetteville, Georgia at reference coordinates 33° 25' 42" and West Longitude 84° 28' 22". These coordinates reflect a site restriction of 2.7 kilometers south-southwest of the community to avoid shortspacing WFOX, Channel 246C, Gainesville, Georgia. Fayetteville will receive a 3.16 mV/m signal from this hypothetical reference site. Attached as Exhibit #3 is the Detailed Usable Area Study for Channel 248C3 at Fayetteville, Georgia. A Channel 248C3 allocation analysis is attached as Exhibit #4. Both exhibits assume that Channel 239A is substituted for Channel 248A at Hogansville as proposed. Channel 248C3 at Fayetteville is mutually exclusive with the present Channel 249A allotment at Griffin.

17. Fayetteville, Georgia, an incorporated community with 5,827 persons according to the 1990 census, presently has no local aural service. Griffin, while having a larger population, is serviced by two other stations, WHIE (AM), 1320 kHz and WKEU (AM), 1450 kHz, which are licensed to Griffin. DMI is the licensee of full time station WKEU (AM). Further, Griffin would continue to receive greater than a 1.0 mV/m service from the improved Channel 248C3 allotment at Fayetteville.

18. According to the 1980 and 1990 census data, neither Griffin nor Fayetteville is located within the Atlanta Urbanized area. Therefore, service provided by Atlanta stations should not be attributed to either community. Fayetteville has an elected mayor and five member city council. The city provides its own fire and police services, separate from county services. Fayetteville has its own post office, banks and numerous businesses. The necessary community identia is present in Fayetteville to demonstrate the need for a local FM station. Fayetteville is the county seat of Fayette county.

19. Channel 239A can be allotted to Hogansville, Georgia at the presently authorized WEIZ construction permit location at coordinates North Latitude 33° 03' 54" and West Longitude 84° 57' 23", in lieu of Channel 248A. City grade coverage from this site to Hogansville will be maintained. Exhibit #5 visually demonstrates the usable area for Channel 239A at Hogansville, Georgia. Exhibit #6 is a Spacing Study for Channel 239A at the WEIZ site. The allotment of Channel 239A to Hogansville assumes that Channel 237A has been substituted for Channel 239A at Greenville, Georgia, as proposed below.

20. The permittee of WEIZ, T. Wood and Associates, Inc. ("Wood") has consented to the substitution of channels. The Petitioners have agreed to reimburse Wood for reasonable

expenses associated with making the channel change. The allotment of Channel 239A will allow WEIZ to operate with 6.0 kilowatts and eliminate grandfathered shortspacings. The present channel (248A) has shortspacings with four other Commission authorized facilities and is precluded from easily upgrading to a maximum 6.0 kilowatt Class A facility.

21. Channel 237A can be allotted to Greenville, Georgia in substitution for Channel 239A at reference coordinates North Latitude 32° 56' 58" and West Longitude 84° 37' 42". This site represents a site restriction of 11.8 kilometers south-southeast of the community to avoid shortspacing Channel 239A at Hogansville, Georgia and WASZ, Channel 237A, Ashland, Alabama. A 3.16 mV/m signal will be delivered to Greenville from the herein proposed reference site. There are presently three applications on file with the Commission for the present Channel 239A allotment at Greenville.<sup>4</sup> The Petitioners request that applicants be ordered to amend their applications to specify operation on Channel 237A in lieu of Channel 239A.

<sup>4</sup> The applicants for Channel 239A at Greenville, Georgia are Greenville Communications, Inc. (BPH-901221MH), Rocky Mount Broadcasting (BPH-801221MG) and Orchon Broadcasting Co. (BPH-901221MI).

22. Channel 237A cannot be utilized at any of the present/proposed Greenville Channel 239A sites. The above proposed reference site for Channel 237A was selected by the petitioners as an available site at which the applicants for the Greenville channel could relocate and operate a six kilowatt Class A facility. The petitioners note that this is not the only parcel of land potentially available for a transmitter within the usable area for Channel 237A.

23. Attached, as Exhibit #7 is the Detailed Usable Area Study for Channel 237A at Greenville. A §73.207 spacing analysis for Channel 237A is Exhibit #8. Both exhibits assume that WTGA, Channel 237A, Thomaston, Georgia has been ordered to Channel 266A, as proposed below. Further, the exhibits also reflect the required spacing to WEIZ Hogansville, Georgia on Channel 239A.

24. Channel 266A can be substituted for Channel 237A at Thomaston, Georgia at reference coordinates North Latitude 32° 54' 08" and West Longitude 84° 23' 13".<sup>5</sup> While this

<sup>5</sup> Channel 266A had been allotted to Hannahs Mill, Georgia in MM Docket #89-547. However, a Petition for Reconsideration was filed asking that the channel be removed. The Commission granted the reconsideration and deleted Channel 266A at Hannahs Mill, DA 92-719, released June 18, 1992.

site is not the presently authorized site for WTGA, Thomaston, Georgia, it is only 5.25 kilometers from the WTGA site. This restriction from the present WTGA site will avoid shortspacing WCJM, Channel 265A, West Point, Georgia.

25. The licensee of WTGA, Radio Georgia, Inc. has reached an agreement with the petitioners to relocate its site for WTGA, if necessary, to accommodate the proposed channel substitution.<sup>6</sup> Thomaston will be completely served by city grade service from the Channel 266A reference site. Exhibit #9 is the detailed Usable Area Study for Channel 266A at Thomaston. A §73.207 spacing analysis is attached as Exhibit #10.

#### PUBLIC INTEREST ASPECTS

26. When WSKS is upgraded to a Class C3 facility, it will enable the facility to increase the number of persons in its service area to 4,759.5 square kilometers and containing 83,989 persons based on 1990 census figures. This represents an increase of 2,929.6 square kilometers and 55,466 persons

<sup>6</sup> Under §73.215 of the Commission's rules, Channel 266A can be utilized at the present WTGA site as a six kilowatt Class A facility, which is the intention of the licensee of WTGA. This further minimizes the actual impact of this proposal.

over its presently authorized facility. WQUL will likewise increase the population within its 1.0 mV/m contour to 867,736 persons and the area to 4,782.3 square kilometers, which is an increase of 744,796 persons and 2,445.4 square kilometers over the present Class A facility.

27. Further, adoption of this proposal will allow WEIZ to operate as a maximum Class A facility. The increase from three to six kilowatts will allow WEIZ to serve 73,884 persons in 2,502.6 square kilometers. This is an increase of 14,408 persons and 675.4 square kilometers over its presently authorized facility.

28. This proposal will enable two existing facilities to expand their coverage and provide two communities which presently either have no service or no full time service with their first full time local FM stations.

REQUESTED CHANGES TO §73.202(b)

29. Good Medicine Radio, Georgia, Inc. and Design Media, Inc. request the following changes be made to the Commission's table of FM allotments:

Eatonton, Georgia

Present  
None

Proposed  
249C3

Sparta, Georgia

Present  
249A, 274A

Proposed  
274A

Fayetteville, Georgia

Present  
None

Proposed  
248C3

Griffin, Georgia

Present  
249A

Proposed  
None <sup>7</sup>

Hogansville, Georgia

Present  
248A

Proposed  
239A

Greenville, Georgia

Present  
239A

Proposed  
237A

Thomaston, Georgia

Present  
237A

Proposed  
266A

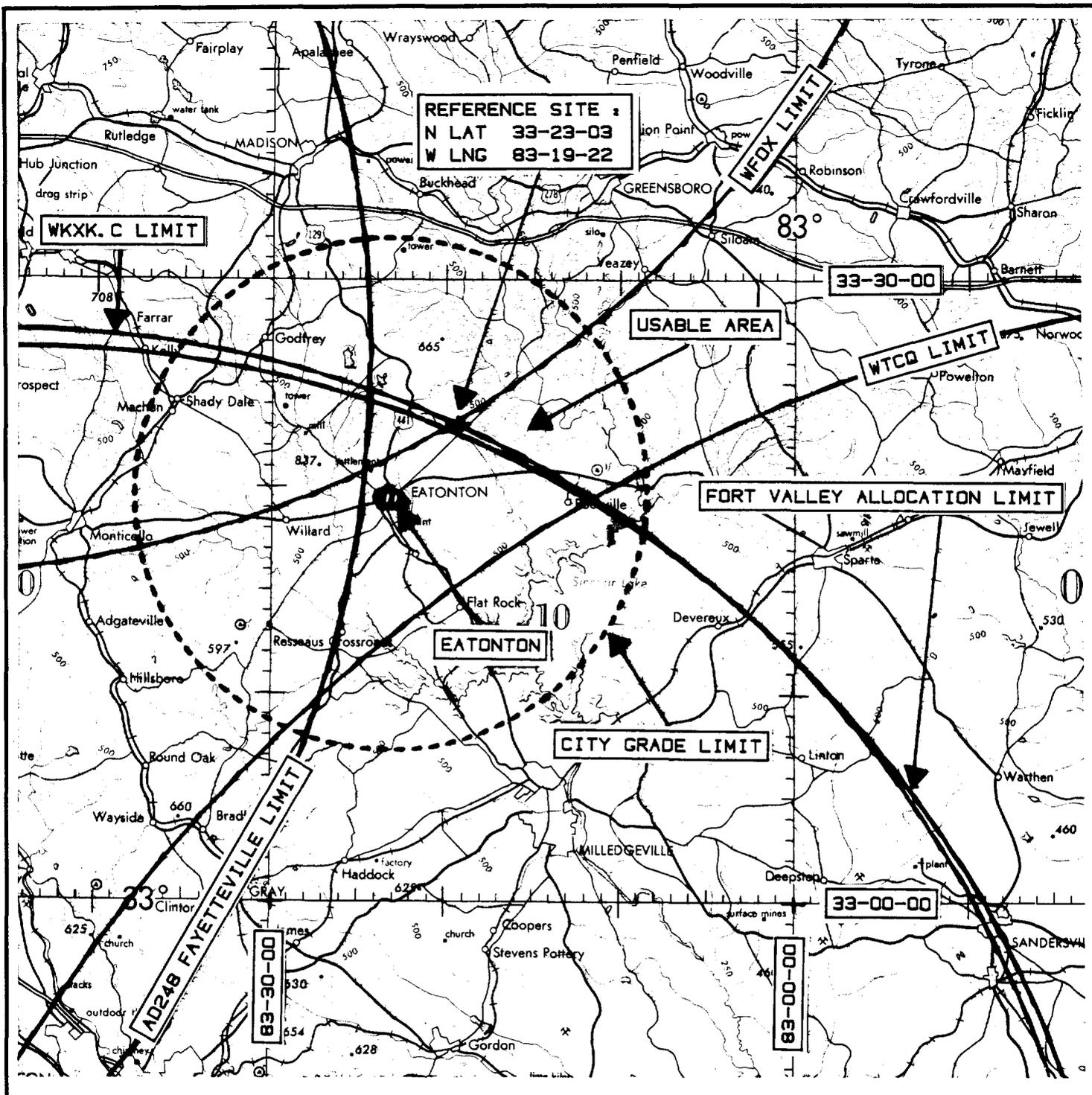
30. When Channel 249C3 is allotted to Eatonton, Georgia, GMRGI will file, on a timely basis, an application for construction permit to make minor changes in the facilities of WSKS to specify operation on Channel 249C3. DMI, upon the allotment of Channel 249C3 at Fayetteville,

<sup>7</sup> Service from WKEU (AM) (Full-time) and WHIE (AM) will remain licensed to Griffin.

will file an application for construction permit to make minor changes in the facilities of WQUL to operate on Channel 248C3 at Fayetteville.

31. The Petitioners also restate their willingness to reimburse the permittee of WEIZ and the licensee of WTGA for reasonable expenses in order to make the needed channel changes at Hogansville and Thomaston, respectively.

32. The foregoing technical statement was prepared on behalf of the petitioners by Bromo Communications, Inc., their Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. Should questions arise during consideration of these comments, we welcome the opportunity to discuss the matter by phone at (912) 638-5608.



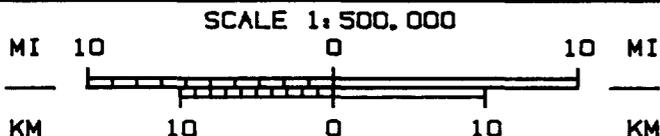
**USABLE AREA CHANNEL 249C3**

MAP IS A PORTION OF THE 1: 500, 000 SCALE ATLANTA SECTIONAL AERONAUTICAL CHART.

MAP ASSUMES THAT WQUL GRIFFIN, GA HAS BEEN ORDERED TO CHANNEL 248C3 AT FAYETTEVILLE, GEORGIA.

**EXHIBIT #1  
PETITION FOR RULE MAKING  
GOOD MEDICINE RADIO, GA, INC  
& DESIGN MEDIA, INC  
NUMEROUS COMMUNITIES  
IN THE STATE OF GEORGIA**

June 1982



**BROMO**  
**COMMUNICATIONS**

St Simons Island, Georgia

BROADCAST  
TECHNICAL CONSULTANTS

Washington, D. C.

ALLOCATION STUDY FOR EATONTON, GEORGIA  
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE  
33 23 03 N  
83 19 22 W

CLASS C3  
Current rules spacings  
CHANNEL 249 - 97.7 MHz

DISPLAY DATES  
DATA 05-27-92  
SEARCH 06-22-92

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD249 AD	249C3 33 23 03	Eatonton 83 19 22	GA 0.000 kW	0.0 0M	0.00 0.0	153.0 95.1	-153.00 *
GMRGI/DMI							
WSKS LI CN	249A 33 13 36	Sparta 83 03 09	GA 3.000 kW	124.8 100M	30.64 19.0	142.0 88.3	-111.36 *
Good Medicine Radio, GA, Inc. BLH880219KC							
WKXK.C CP ZCN	250C3 32 34 12	Fort Valley 83 45 26	GA 9.800 kW	204.2 152M	99.00 61.5	99.0 61.5	0.00 *
Middle Georgia Broadcasting, BPH910416IB 930623 >From Channel 250A per D90-325-Amended 910916							
WFOX LI CY	246C 34 07 32	Gainesville 83 51 31	GA 100.000 kW	328.9 479M	96.06 59.7	96.0 59.7	0.06 <
Trefoil Broadcasting Company, BLH840907CR							
ALOPEN AL N	250C3 32 33 20	Fort Valley 83 44 14	GA 0.000 kW	202.9 0M	99.73 62.0	99.0 61.5	0.73 <
90-325							
AD248 AD	248C3 33 25 42	Fayetteville 84 28 22	GA 0.000 kW	272.6 0M	107.09 66.6	99.0 61.5	8.09
GMRGI/DMI							
WTCQ LI CN	249A 32 13 12	Vidalia 82 26 13	GA 6.000 kW	147.3 88M	153.47 95.4	142.0 88.3	11.47
Vidalia Communications, Corp. BMLH900814KD							
WKXK LI CN	250A 32 34 34	Fort Valley 83 54 17	GA 3.000 kW	211.3 90M	104.83 65.2	89.0 55.3	15.83
Middle Georgia Broadcasting, BLH891222KH							

ALLOCATION STUDY CHANNEL 249C3

NOTE : STUDY ASSUMES THAT CHANNEL 248C3 HAS BEEN SUBSTITUTED FOR CHANNEL 249A AT GRIFFIN, GEORGIA AND THE IMPROVED CHANNEL HAS BEEN ALLOTTED TO FAYETTEVILLE, GEORGIA.

EXHIBIT #2

PETITION FOR RULE MAKING  
GOOD MEDICINE RADIO, GA, INC  
& DESIGN MEDIA, INC  
NUMEROUS COMMUNITIES  
IN THE STATE OF GEORGIA

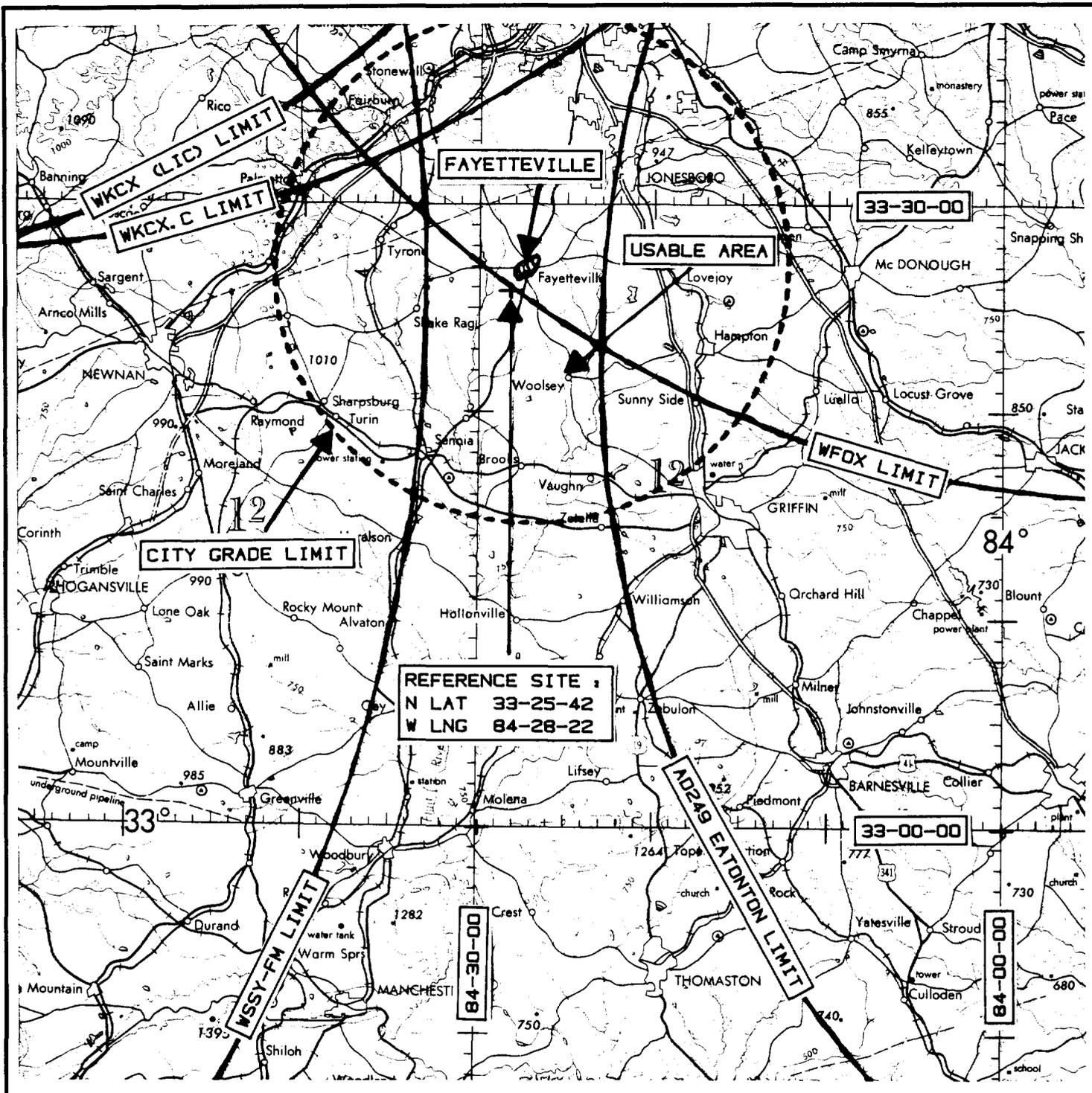
June 1992

**BROMO**  
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST  
TECHNICAL CONSULTANTS

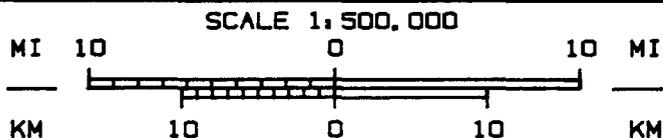
Washington, D.C.



**USABLE AREA CHANNEL 248C3**

MAP IS A PORTION OF THE 1:500,000 SCALE ATLANTA SECTIONAL AERONAUTICAL CHART.

USABLE AREA ASSUMES THAT WEIZ HOGANSVILLE, HAS BEEN ORDERED TO CHANNEL 239A.



**EXHIBIT #3**

**PETITION FOR RULE MAKING  
GOOD MEDICINE RADIO, GA, INC  
& DESIGN MEDIA, INC  
NUMEROUS COMMUNITIES  
IN THE STATE OF GEORGIA**

June 1992

**BROMO**  
**COMMUNICATIONS**

St Simons Island, Georgia

BROADCAST  
TECHNICAL CONSULTANTS

Washington, D.C.