

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re Applications of:

MM Docket No. 92-33

CENTRAL FLORIDA EDUCATIONAL)
FOUNDATION, INC.)
Union Park, Florida)
)
BIBLE BROADCASTING NETWORK, INC.)
Conway, Florida)
)
SOUTHWEST FLORIDA COMMUNITY)
RADIO, INC.)
Conway, Florida)
)
MIMS COMMUNITY RADIO, INC.)
Oak Hill, Florida)
)
HISPANIC BROADCAST SYSTEM, INC.)
Lake Mary, Florida)

File No. BPED-881207MA

File No. BPED-890412MJ

File No. BPED-891127MC

File No. BPED-891127MD

File No. BPED-891128ME

For a New Noncommercial
Educational FM Broadcast

To: The Honorable Edward J. Kuhlmann
Administrative Law Judge

PROPOSED FINDINGS OF FACT
AND CONCLUSIONS OF LAW
OF SOUTHWEST FLORIDA COMMUNITY RADIO, INC.

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To: The Honorable Edward J. Kuhlmann
Administrative Law Judge

**PROPOSED FINDINGS OF FACT
AND CONCLUSIONS OF LAW
OF SOUTHWEST FLORIDA COMMUNITY RADIO, INC.**

Southwest Florida Community Radio, Inc. (Southwest) files its proposed Findings of Fact and Conclusions of Law pursuant to Order, FCC 92M-810 released July 23, 1992. Four of the applicants in this proceeding: Central Florida Educational Foundation, Inc. (Central), Bible Broadcasting Network, Inc. (BBN), Southwest, and Hispanic Broadcast System, Inc. (Hispanic) filed a Joint Petition for Approval of Settlement Agreement and a

Motion for Suspension of Procedural Dates on August 7, 1992. The Joint Petition for Approval of Settlement Agreement contemplates the unconditional dismissal of the applications of Southwest and BBN in exchange for consideration. In light of the executed settlement, the parties requested that the August 10 due date for findings and conclusions be suspended for BBN and Southwest. Southwest was advised telephonically on August 10, 1992 that the motion to suspend procedural dates had been denied.¹

The case was designated for hearing by Hearing Designation Order, DA 92-224, released March 10, 1992. The following issues were designated:

1. If a final environmental impact statement is issued with respect to the above-mentioned applicants, in which it is concluded that the proposed facilities are likely to have an adverse effect on the quality of the environment, to determine whether the proposal is consistent with the National Environmental Policy Act, as implemented by Sections 1.1301-1.1319 of the Commission's Rules.
2. To determine: (a) the number of other reserved channel noncommercial educational FM services available in the proposed service area of each applicant, and the area and population served thereby; (b) whether a share-time arrangement between the applicants would result in the most effective use of the channel and thus better serve the public interest and, if so, the terms and conditions thereof; and (c) in light of Section 307(b) of the Communications Act of 1934, as amended, which of the proposals would best provide a fair, efficient and equitable distribution of radio service.
3. To determine, in the event it is concluded that a choice between the applications should not be based solely on considerations relating to Section 307(b), the extent to which each of the proposed operations

¹ Mims Community Radio, Inc. although not joining in the Motion indicated it would interpose no objection.

will be integrated into the overall cultural and educational objectives of the respective applicants; and whether other factors in the record demonstrate that one applicant will provide a superior FM educational broadcast service.

4. To determine, in light of the evidence adduced pursuant to the specified issues, which of the applications should be granted, if any.

The environmental issue designated against Southwest and all the other applicants except Mims was favorably resolved. See MO&O, FCC 92M-786 (released July 16, 1992). The environmental issue designated against Mims is still outstanding. See Letter dated August 4, 1992, Ref. 1800B3-BJB from the Assistant Chief Audio Services Division to Judge Edward Judge Kuhlmann.

Direct cases were exchanged by the parties on July 13, 1992. The record was closed at the final hearing session on July 21, 1992. See Order, FCC 92M-810 (released July 23, 1992).

1.0 FINDINGS OF FACT ON SOUTHWEST FLORIDA COMMUNITY RADIO, INC.

1.1 PROPOSED INTEGRATION OF SOUTHWEST STATION OPERATIONS INTO THE OVERALL CULTURAL AND EDUCATIONAL OBJECTIVES OF SOUTHWEST.

1.1.1 Structure and Purpose of Southwest.

Southwest is a not-for-profit nonstock corporation with 11 directors. Its directors are:

<u>Name and Residence</u>	<u>Office Held</u>	<u>Director or Member of Governing Board</u>
Robert D. Augsburg 7139 N. Brentwood Road Fort Myers, FL 33919	President	Yes

Felice Augsburg 7139 N. Brentwood Road Fort Myers, FL 33919	Vice President	Yes
Fred C. Shutrump 15505 Thory Court Fort Myers, FL 33908	Director	Yes
Merri Shutrump 15505 Thory Court Fort Myers, FL 33908	Secretary	Yes
Sherryl Ford 2670 Jackson Street Fort Myers, FL 33901	Director	Yes
John Geyer 229 S.E. 29th Terrace Cape Coral, FL 33904	Director	Yes
Larry Ford 2670 Jackson Street Fort Myers, FL 33901	Director	Yes
Steve Maloney 2455 Ivy Avenue Fort Myers, FL 33907	Director	Yes
Dean Castillo 3161 S.W. 117th Avenue Davie, FL 33330	Director	Yes
Colette Geyer 11507 Timerblin Circle Fort Myers, FL 33912	Director	Yes
Mr. John Gursoy 4002 Cindy Avenue Naples, FL 33962	Director	Yes

Southwest's cultural and educational goal is to advance the educational goals of public and private educational institutions and public service and charitable organizations in the service area as more particularly set forth in Attachment 1. Southwest Ex. 1, p. 2.

1.1.2 Proposed Programming.

Southwest proposes to air programming which will address the educational, informational and cultural needs of service area youth, families and the service area as a whole. It will broadcast news, Hispanic programming, educational programming, instructional programming, entertainment programming, PSAs, student-produced programming, cultural programming, school related programming, and public affairs programming. Educational programming will include inter alia such educational programming on youth-oriented topics such as drugs, family and social interaction, inter-personal relationships and religion. Attachment 2 describes programming contemplated. Southwest Ex. 1, p. 1.

1.1.3 Ascertainment Efforts.

Southwest devised its programming based generally on input from individuals within the service area of the proposed station as well as on its experience programming WAYJ(FM) in Ft. Myers, Florida and WAYM(FM) in Columbia, Tennessee. Southwest will, if awarded a construction permit for Conway, Florida, regularly contact service area residents and community leaders in order to ascertain community needs in an effort to address issues of particular importance to Conway and the surrounding service area. Southwest will form and consult with an advisory committee of individuals active in educational endeavors within the Conway Service area. Southwest Ex. 2, p. 2.

1.1.4 Likelihood of Effectuation.

Five members of Southwest's Board have experience in broadcasting. Bob Augsburg is currently managing WAYM(FM) in Columbia, Tennessee and was from 7/87 to 2/92 managing Southwest's WAYJ(FM) in Ft. Myers, Florida. The Board oversees the operation of both stations and many of its members, in addition to being involved in broadcasting, have educational experience. Southwest Ex. 2, p. 2.

1.1.5 Cooperation With Service Area Schools.

Southwest will cooperate with schools within the Conway service area to promote, support, and air educational events, cultural events, and sports events. It will cooperate with Orange County, Florida Schools, with service area institutions of higher learning, and will coordinate with local high schools to promote and support outstanding students. Southwest will also interview students who possess particular scholastic and artistic ability. Southwest Ex. 2, p. 3.

1.1.6 Integration/Involvement of Board in Station Operations.

Southwest will relocate at least one Board member to the Conway, Florida area. In addition, the Board members all have experience in either broadcasting and/or education. Southwest Ex. 2, p. 3.

1.1.7 Internships With the Station.

Southwest proposes to provide internships at the station. Southwest has a successful track record of training interns at WAYJ(FM) in Ft. Myers, Florida and will continue to provide

similar training in Conway. It will, in conjunction with area high schools and colleges, seek to offer academic credit for internships at the station. Southwest Ex. 2, p. 3.

1.2 OTHER FACTORS DEMONSTRATING SOUTHWEST WILL PROVIDE SUPERIOR FM EDUCATIONAL BROADCAST SERVICE.

Southwest will provide auxiliary power at both its transmitter and main studio in order to ensure continued operations in the event of a power outage. Southwest Ex. 3, p. 1.

Southwest also has a record of successfully operating other noncommercial stations. Southwest has been the licensee of WAYJ(FM) in Ft. Myers, Florida since 10/87 and is currently the licensee of WAYM(FM) in Columbia, Tennessee. Southwest Ex. 3, p. 1.

2.0 FINDINGS OF FACT ON HISPANIC BROADCASTING SYSTEM, INC.

2.1 DESCRIPTION OF THE APPLICANT.

Hispanic is a non-profit corporation organized under the laws of Puerto Rico on November 17, 1989. The officers and members of the Board of Directors of Hispanic Broadcast System, Inc. are:

Idalia Arzuaga, President
Calle 2 C-8
Urbanizacion El Retiro
Quebradillas, PR 00742

Jose Arzuaga, Vice-President
Calle 2 C-8
Urbanizacion El Retiro
Quebradillas, PR 00742

Ruben Reyes, Secretary
Urb. Valle Verde
Marginal C-5
Ponce PR 00731

All members of the corporation are Hispanic. Hispanic Ex. 1, p. 2.

2.2 HISPANIC'S CULTURAL AND EDUCATIONAL OBJECTIVES.

Hispanic proposes to direct its programming mainly to the minority Hispanic population. This would be the first and only Spanish Educational Station in the Orlando market. Hispanic intends to serve the cultural and educational needs of the Hispanic community within its proposed service area with a Spanish-oriented, primarily secular educational facility. The applicant will also present cultural material and religious information. Access to Lake Mary community school would be made available. Hispanic Ex. 2, p. 1.

2.3 HOW THE PROPOSED OPERATION OF THE STATION WILL BE INTEGRATED INTO THE OVERALL CULTURAL AND EDUCATIONAL OBJECTIVES OF THE SERVICE AREA.

All of Hispanic's principals are Spanish-speaking. They intend to serve the Hispanic population by teaching them the English language and American history and culture so that they may be integrated into the community. The general population will also be served by exposing them to the language, culture and other needs of the Hispanic community. A course in Spanish language will be provided for the english-speaking population which will foster greater harmony between the two cultures. The applicant will seek the cooperation of the local educational

institutions to achieve its educational objectives with primary emphasis on educational programs oriented to the Hispanic population. Hispanic Ex. 3.

2.4 HISPANIC'S ABILITY TO EFFECTUATE ITS PLANS.

Two of Hispanic's principals are experienced broadcasters and plan to bring this experience to bear in effectuating its proposal. One of its principals is an experienced educator. Hispanic. Ex. 5.

2.5 SHARE-TIME.

Hispanic believes that a share-time arrangement would result in the most effective use of the channel. Hispanic would be the first Hispanic FM station in the market, and the only Hispanic noncommercial educational station. It believes that the service it is proposing is of such importance to the Hispanic community that it is willing to share time with other applicants as a means of obtaining at least some participation in educational radio in the Orlando market. Hispanic Ex. 6.

3.0 FINDINGS OF FACT ON BIBLE BROADCASTING NETWORK, INC.

3.1 TIME SHARE.

BBN does not believe that a time share arrangement among all the applicants in this proceeding is practical. BBN Ex. 1, p. 1.

3.2 CORPORATE STRUCTURE/USE OF STATION TO ADVANCE AN EDUCATIONAL PROGRAM.

BBN is a Virginia non-profit non-stock corporation with a seven member Board of Directors with each member holding 14.29% in the corporation. The President of BBN is Lowell L. Davey, who

is a director. The Vice President is Georgeanna Davey, who is a director. Joseph J. Mast is Secretary/Treasurer, and a director. Terry Hylton is Assistant Secretary. Other directors include R. Lindsay Poteat, Joy A. Raley, Frank McDowell, and David Jeremiah.

BBN's news coverage, public service, and public affairs programming, will help inform and educate the public to develop a better community. BBN will educate, assist and help resolve solutions to law enforcement problems and meet many needs of the Conway community. BBN also offers free counselling to people who need help in spiritual and social needs. BBN Ex. 2, p. 1.

3.3 PROPOSED PROGRAMS.

BBN attached a list of proposed programming as Exhibit 3. None of the programming appears to be locally produced and none appears to be directed specifically to the local market. BBN Ex. 3.

3.4 SUPERIOR BROADCAST SERVICE.

BBN has constructed many educational FM stations, all of which operate (or will operate) with a noncommercial educational format. BBN also operates FM translators. BBN Ex. 4, p. 1.

3.5 AUXILIARY POWER.

BBN proposes to install an auxiliary power source to ensure the continuation of operations of the station in the event of an interruption of regular power. BBN Ex. 5, p. 1.

4.0 PROPOSED FINDINGS OF FACT ON MIMS COMMUNITY RADIO, INC.

Mims submitted no evidence on Issue 3 of the HDO. It is relying on 307(b) evidence as set forth in the Joint Engineering

Exhibit submitted by the parties. See July 13, 1992 Letter to the Honorable Edward J. Kuhlmann.

5.0 PROPOSED FINDINGS OF FACT ON CENTRAL FLORIDA EDUCATIONAL FOUNDATION, INC.

5.1 LEGAL QUALIFICATIONS AND CORPORATE STRUCTURE.

Central is a nonprofit, nonstock corporation organized under the laws of the State of Florida. Central is a non-member corporation governed by its board of directors. Central has always had three (3) directors, and the present members of the Board of Directors are: James S. Hoge, President, Thomas H. Moffit, Jr., Vice President-Treasurer, and Richard A. Rosenberg, Secretary. Central Ex. 1, p. 1.

5.2 CENTRAL'S EDUCATIONAL AND CULTURAL OBJECTIVES AND ITS PROPOSED METHODS TO MEET THOSE OBJECTIVES.

5.2.1 Objective One: Provide Instructional Programming for Credit With Circle Community School and Other Local Educational Institution.

Central has agreements with a number of educational institutions in the area to broadcast instructional programming produced by the institution in cooperation with Central as part of the institution's regular instructional program.

Central Community School will produce, in conjunction with Central, an hour long daily program hosted by its president, Jim Waner, which will discuss the legal, emotional and educational issues involved in home schooling. Central Ex. 2, p. 2.

Reformed Theological Seminar (RTS) curriculum offerings are structured so that students in all RTS degree programs would receive credit for work done in a radio station or program

production internship. In addition, RTS Director of Media Ministries, Don Bush, has been assigned the task of coordinating the production of a regular radio program. The program would involve students and faculty discussing contemporary theological issues and discussing strategies for ministry outreach growth both locally and in mission fields. Central Ex. 2, p. 2.

Central and Stetson University, as well as the School Board of Seminole County, have agreed to develop instructional programming modules if Central receives the authorization to construct the station. Central Ex. 2, p. 3.

5.2.2 Objective Two: Provide Students With an Opportunity for Internships to Receive Hands-On Training for Credit As Part of Their Academic Program.

Central will work with the instructional staffs of four different educational institutions, CCS, RTS Seminole County and Stetson, to provide an internship training program at the station in radio station operation and program production for student credit. Central Ex. 2, p. 3.

5.2.3 Objective Three: Provide a Local Transmission Service to Union Park.

Union Park is a community without any source of local news or community announcements. The University of Central Florida, with a student body of roughly 10,000, is located within Union Park's boundary. It presently has no radio or television stations licensed to it, and it doesn't have a local newspaper published in it. Central Ex. 2, p. 4.

5.2.4 Objective Four: Provide Quality Hispanic/Spanish Programming and Spanish-Language Informational Programming to the Service Area, Especially at Night.

Central proposes two Spanish-language programming blocks. From 9:00 until 11:30 each night Central proposes to broadcast Spanish-language programming. This programming will include local news, sports, and weather in Spanish, as well as three programs designed to be responsive to the most critical needs of Central Florida's Spanish-speaking community. Central Ex. 2, p. 5.

5.2.5 Objective Five: Provide Information on Home Schooling to Parents Within the Service Area.

Mr. Jim Hoge is a member of the Board of Directors of the Circle Community School (CCS). CCS is a school that provides materials, professional advice and moral support to parents who choose to educate their children at home. On the second of Central's subcarrier channels, it will broadcast programming generated by Circle Community School for home school families. This programming would include class notes and classes for specific grade students, such as geography and social studies, and information on how to cope with children in the home-school environment. Many class offerings for credit as possible would be broadcast on the subcarrier on a rotating 24-hour basis. Central Ex. 2, p. 8.

5.2.6 Objective Six: Provide an Outlet for Christian Educational and Instructional Programming.

In addition to local instructional programming, Central will broadcast a number of educational programs received via satellite

from the Moody Bible Institute and the Northwest College Network. Central Ex. 2, p. 9.

5.2.7 Objective Seven: Provide Support For Families and Family Life Through the Broadcast of Programming Responsive to the Personal and Emotional Needs of Families.

Central proposes to broadcast a number of programs, both in English and Spanish, which are designed to meet the personal and emotional needs of families. This programming includes: "the Mirith-Meier Clinic," distributed by the Moody Bible Institute, which often discusses the psychological stress on modern families; "Family Forum," distributed by the Northwestern College Network; and "Vida en los Estados Unidos" and "TeleAmiga," which will often focus on family issues. Central's proposed program schedule lists not less than 30 hours of programming specifically designed to meet family needs and issues. Central Ex. 2, p. 9.

5.2.8 Objective Eight: Provide Programming Responsive to the Expressed Needs of the Community.

Central hopes to provide programming, in general, responsive to the problems, needs and interests of the community. In addition to the programming discussed above, Central proposes to broadcast a number of programs responsive to specific community needs. These programs include: "Woman to Woman," which discusses issues of interest to women; "Young Life," which deals with youth issues; and, "Joni and Friends," a program designed to explore issues of interest to the handicapped. Central Ex. 2, p. 10.

In addition, Central will broadcast a program, "A Call to Action," Monday through Friday at noon, hosted by Central's president, Jim Hoge, in which local newsmakers will be interviewed and respond to questions from listeners. Central anticipates that the whole gamut of community problems will be discussed during this program. Likewise, a program with much the same format will be broadcast on Sunday, called "Who Are They?" Like "A Call To Action," "Who Are They" will be responsive to a number of community needs depending on the urgency of the issues on the minds of the listeners who call in. Central Ex. 2, p. 10.

5.3 CENTRAL'S METHODS OF DETERMINING COMMUNITY NEEDS.

Roughly every six months, the Orlando Radio Broadcasters Association sponsors a "Community Ascertainment Project" at a local hotel such as the Omni or the Radisson Plaza. At these projects local community leaders agree to make themselves available for varying lengths of time to speak on community issues and respond to questions from the audience. Both Mr. Hoge and Mr. Moffit reviewed the survey sheets and used the information in the formulation of public interest programming for WTLN, as well as for its program proposal for Central. Central Ex. 3, p. 1.

Another "Community Ascertainment Session" was held at the Omni Hotel, and Mr. Hoge attended. He interviewed and completed survey sheets on 24 community leaders ranging from the Chief of Police to the president of the Metropolitan Orlando Urban League. Central Ex. 3, p. 1.

Central's principals Mr. Hoge and Mr. Moffit are also exposed on a daily basis to the public's perception of the community's needs through the production and airing of public affairs programming on WTLN. Mr. Hoge and Mr. Moffit also regularly read and review the local news reports in the Orlando Sentinel, and on call-in and talk radio shows broadcast on other stations in the market such as WWNZ and WDBO. Central Ex. 3, p. 2.

**5.4 CENTRAL'S MEANS OF IMPLEMENTING ITS
EDUCATIONAL AND CULTURAL OBJECTIVES.**

Two of Central's three directors, James S. Hoge, Jr. and Thomas H. Moffit, Jr., will work at Central's proposed station full-time, a minimum of 40 hours per week. Mr. Hoge will work as the Station's General Manager, and be generally responsible for policy decisions that effect the station, for a majority of the public relations and station relations with the community, and for matters pertaining to the FCC and the station's technical plant. Mr. Moffit will serve as Station Manager, and be responsible, under Mr. Hoge, for station programming and scheduling, for station sales, i.e., for the sale of broadcast time and the solicitation of donations for station operation, and for other matters pertaining to station operation. Central Ex. 4, p. 1.

Two of Central's directors, Mr. Hoge and Mr. Rosenberg, were directors of DeLand Christian Academy, a kindergarten through 12th grade school located in DeLand which operated for

some ten years and the recently ceased operation. Mr. Hoge is also a director of the Circle Community School (CCS). Central Ex. 4, p. 1.

Mr. Hoge, when he was the general manager of WYND from 1987 to 1989 utilized student interns from the marketing department of Stetson University to develop a marketing plan for DeLand Christian Academy as part of their class project. Central Ex. 4, p. 2.

Messrs. Hoge and Moffit, generally, have experience producing radio programming. Mr. Hoge is functionally bi-lingual and assists in the production of Spanish-language radio programming, "Rayo da Esperanza," by the Primera Iglesia Bautista, Cali, Colombia, and the Spanish-language programming produced by the Southern Baptist Seminary in Cali, Colombia. Central Ex. 4, p. 3.

5.5 PAST BROADCAST RECORD OF CENTRAL'S PRINCIPALS.

Thomas H. Moffit, Jr., a trustee of Central, has been the General Manager of WTLN (AM & FM) since 1968, and has been a principal of the licensee, Alton Rainbow Corporation since the mid-70's. Mr. Moffit has, in addition, committed to work at Central's proposed station full-time as its Station Manager should Central's application be granted. Central Ex. 5, p. 21.

Central's president, James S. Hoge, has been Director of Engineering for WTLN (AM & FM, Apoka, WRJZ, WYLV, Knoxville, Tennessee and WCVH and WEEE, Chester, Pennsylvania-Cherry Hill, New Jersey since May 1989. Mr. Hoge is also committed to work at

Central's proposed station full-time as the General Manager.
Central Ex. 5, p. 1.

5.6 CENTRAL'S PROPOSED PROGRAM SCHEDULE.

Descriptions of specific program offerings by Central are outlined below:

1. "Vida En Los Estados Unidos" (Life In the United States). This nightly 50 minute program in "Spanish will use a talk show format to provide Spanish-speaking residents with tips and information on coping with life in the United States. Central Ex. 6, p. 1.

2. "TeleAmiga" ("Telephone Friend"). "TeleAmiga" is a nightly talk and call-in show hosted by a trained bi-lingual psychologist specializing in family issues. Central Ex. 6, p. 1.

3. "Sound Off." These are short, minute long expressions of called in listener opinions about various public issues of importance. "Sound Off" segments will be broadcast throughout the day. Central Ex. 6, p. 2.

4. "Woman to Woman." This program is produced by the Moody bible Institute and concentrates on issues of interest to women: health; balancing job and family responsibilities; childbearing, etc. Central Ex. 6, p. 2.

4. Subcarrier Programming. In addition, Central will broadcast a 24-hour program service in Spanish on its SCA frequency. The programming will consist of recorded Central Spanish-language programming and programming produced by the

Southern Baptist Seminary in Cali, Colombia, and other local and national Spanish programming. Central Ex. 6, p. 2.

On its other subcarrier, Central will broadcast actual classes for credit, class information, curriculum information, school news, and information on how to cope with a home school environment produced by the faculty, staff and families of Circle Community School in conjunction with Central. Central Ex. 6, p. 2.

5.7 AUXILIARY POWER PROPOSAL.

Central will have access to the auxiliary power generator at its proposed site to ensure operation of its transmission plant in the event of a power failure. Central Ex. 9, p. 1.

Central will also install an auxiliary power generator at its studio site to ensure continued station operation in the event of a power failure at its studio. Central Ex. 9, p. 1.

6.0 FINDINGS OF FACT ON ISSUE 2 -- 307(b).

The parties submitted a Joint Engineering Exhibit addressing the 307(b) aspects of Issue 2. The applicants will provide service to the following population and areas:

POPULATION AND AREA DATA

**SOUTHWEST FLORIDA COMMUNITY RADIO, INC.
CHANNEL 202C2 - CONWAY, FLORIDA**

	<u>Population</u>	<u>Area</u>	
		(sq. km.)	(sq. mi.)
No other services	0	0	0
One other service	126,141	1,163	449
Two other services	184,291	1,732	669
Three other services	215,429	816	315
Four other services	0	0	0
Five or more other services	0	0	0
Area common to all	87,287	2,406	929
Area not common to all	438,574	1,305	504
Total	525,861	3,711	1,433

**MIMS COMMUNITY RADIO, INC.
CHANNEL 202C1 - OAK HILL, FLORIDA**

	<u>Population</u>	<u>Area</u>	
		<u>(sq. km.)</u>	<u>(sq. mi.)</u>
No other services	0	0	0
One other service	23,241	554	214
Two other services	129,390	2,279	880
Three other services	31,670	635	245
Four other services	0	0	0
Five or more other services	0	0	0
Area common to all	87,287	2,406	929
Area not common to all	97,014	1,062	410
Total	184,301	3,468	1,339

**HISPANIC BROADCAST SYSTEM, INC.
CHANNEL 202C3 - LAKE MARY, FLORIDA**

	<u>Population</u>	<u>Area</u>	
		<u>(sq. km.)</u>	<u>(sq. mi.)</u>
No other services	0	0	0
One other service	138,791	1,225	473
Two other services	184,552	1,847	713
Three other services	216,196	834	322
Four other services	0	0	0
Five or more other services	0	0	0
Area common to all	87,287	2,406	929
Area not common to all	452,252	1,500	579
Total	539,539	3,906	1,508

**CENTRAL FLORIDA EDUCATIONAL FOUNDATION, INC.
CHANNEL 202C3 - UNION PARK, FLORIDA**

	<u>Population</u>	<u>Area</u>	
		<u>(sq. km.)</u>	<u>(sq. mi.)</u>
No other services	0	0	0
One other service	184,775	1,090	421
Two other services	184,565	1,870	722
Three other services	212,472	728	281
Four other services	0	0	0
Five or more other services	0	0	0
Area common to all	87,287	2,406	929
Area not common to all	494,525	1,282	495
Total	581,812	3,688	1,424

**BIBLE BROADCASTING NETWORK, INC.
CHANNEL 202C2- CONWAY, FLORIDA**

	<u>Population</u>	<u>Area</u>	
		<u>(sq. km.)</u>	<u>(sq. mi.)</u>
No other services	0	0	0
One other service	126,141	1,163	449
Two other services	184,291	1,732	669
Three other services	215,429	816	315
Four other services	0	0	0
Five or more other services	0	0	0
Area common to all	87,287	2,406	929
Area not common to all	438,574	1,305	504
Total	525,861	3,711	1,433