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November 16, 1992

SPECIAL COUNSEL
JEROLD L. JACOBS

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary
Federal Communications Commission
Washington, D.C. 20554

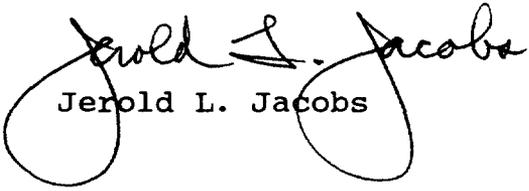
Re: **MM Docket No. 92-214**
FM Table of Allotments
Columbia and Bourbon, Missouri

Dear Ms. Searcy:

Enclosed herewith for filing, on behalf of our client, Lake Broadcasting, Inc., are an original and four (4) copies of its "ERRATUM TO COMMENTS AND COUNTERPROPOSAL OF LAKE BROADCASTING, INC." in the above-referenced FM channel rulemaking proceeding.

Please direct all inquiries and communications concerning this matter to the undersigned.

Very truly yours,


Jerold L. Jacobs

Enc.

cc: As on Certification of Service (all w/enc.)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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|---------------------------------|---|----------------------|
| In the Matter of |) | |
| |) | |
| Amendment of Section 73.202(b), |) | MM Docket No. 92-214 |
| Table of Allotments, |) | |
| FM Broadcast Stations |) | RM-8062 |
| (Columbia and Bourbon, Missouri |) | |

TO: Chief, Allocations Branch
Mass Media Bureau

ERRATUM TO
COMMENTS AND COUNTERPROPOSAL OF LAKE BROADCASTING, INC.

LAKE BROADCASTING, INC. ("Lake"), licensee of Station KBMX(FM), Eldon, Missouri, permittee of Station KXIY(FM), Cuba, Missouri, and an applicant for a new FM broadcast station on Channel 244A at Bourbon, Missouri, by its attorneys, hereby submits an Erratum to Lake's November 13, 1992 "Comments and Counterproposal" in the above-captioned matter.

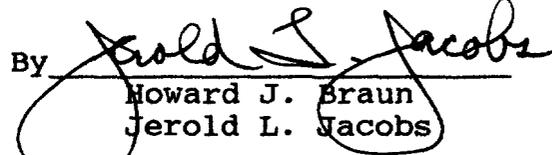
1. Upon review of Lake's referenced "Comments and Counterporposal" after the pleading was filed on November 13, 1992, undersigned counsel discovered that an incomplete version of Exhibit B, the Engineering Statement of J.S. Sellmeyer, was inadvertently supplied. Specifically, Page 1 of Exhibit B was missing and Mr. Sellmeyer's signature and P.E. seal were absent from his Certificate. For simplicity's sake, a complete copy of Exhibit B is attached hereto.

2. Lake respectfully request that, in resolving this

proceeding, the Commission should take account of Lake's complete and properly executed Exhibit B.

Respectfully submitted,

LAKE BROADCASTING, INC.

By 
Howard J. Braun
Jerold L. Jacobs

ROSENMAN & COLIN
1300 - 19th Street, N.W.
Suite 200
Washington, D.C. 20036
(202) 463-7177

Its Attorneys

Dated: November 16, 1992

SELLMEYER ENGINEERING
BROADCAST AND COMMUNICATIONS CONSULTING ENGINEERS
P. O. Box 356 McKinney, Texas 75069
MEMBER AFCCE
(214) 542-2056

ORIGINAL

ENGINEERING STATEMENT IN SUPPORT OF OPPOSITION
OF LAKE BROADCASTING, INC.
TO PETITION FOR RULEMAKING
OF THE GREENFIELD GROUP
TO ALLOCATE CHANNEL 244C1
TO COLUMBIA, MISSOURI
NOVEMBER 13, 1992

This Firm has been retained by Lake Broadcasting, Inc., licensee of Radio Station KBMX(FM), Eldon, Missouri, to examine the proposal of The Greenfield Group ("Greenfield") to upgrade its allocation for Radio Station KCMQ, Columbia, Missouri to Channel 244C1.

THE ALLOCATION

The proposed allocation of channel 244C1 would be site restricted to a location approximately 40.6 kilometers south southeast of the Columbia, Missouri reference point. While this distance would normally be well within the 70 dBu contour for a Class C1 facility, unique terrain anomalies in the Columbia, Missouri area would not permit coverage of the principal city with the requisite 70 dBu coverage, even with maximum facilities.

The average terrain at the proposed allocation site was calculated in accordance with the methods prescribed in Part 73 of the Rules using the NGDC digitized 30 second terrain database with a computer program which linearly interpolates the intermediate points. The average terrain at the proposed site is 203.8 meters for the eight standard radials. Assuming maximum facilities for Class C1, the center of radiation would be 503 meters above mean sea level. The calculated distance to the 70 dBu contour using the method of Section 73.313 of the Rules is approximately 49 kilometers in the direction of Columbia. This contour is plotted on the map of Exhibit 1 for reference. This method would predict adequate coverage of the city of license.

An alternative prediction method using the methods suggested by NBS Technical Note 101 were employed to analyze the coverage within the city of Columbia using diffraction loss calculations to determine the loss due to terrain obstructions along the path. The path calculations were made using a threshold signal strength of 70 dBu using maximum facilities from the proposed reference point. A one degree azimuth interval with 0.2 kilometer resolution was employed for this study. The distance of each radial was extended to 50 kilometers. In areas where the signal can be expected to fall

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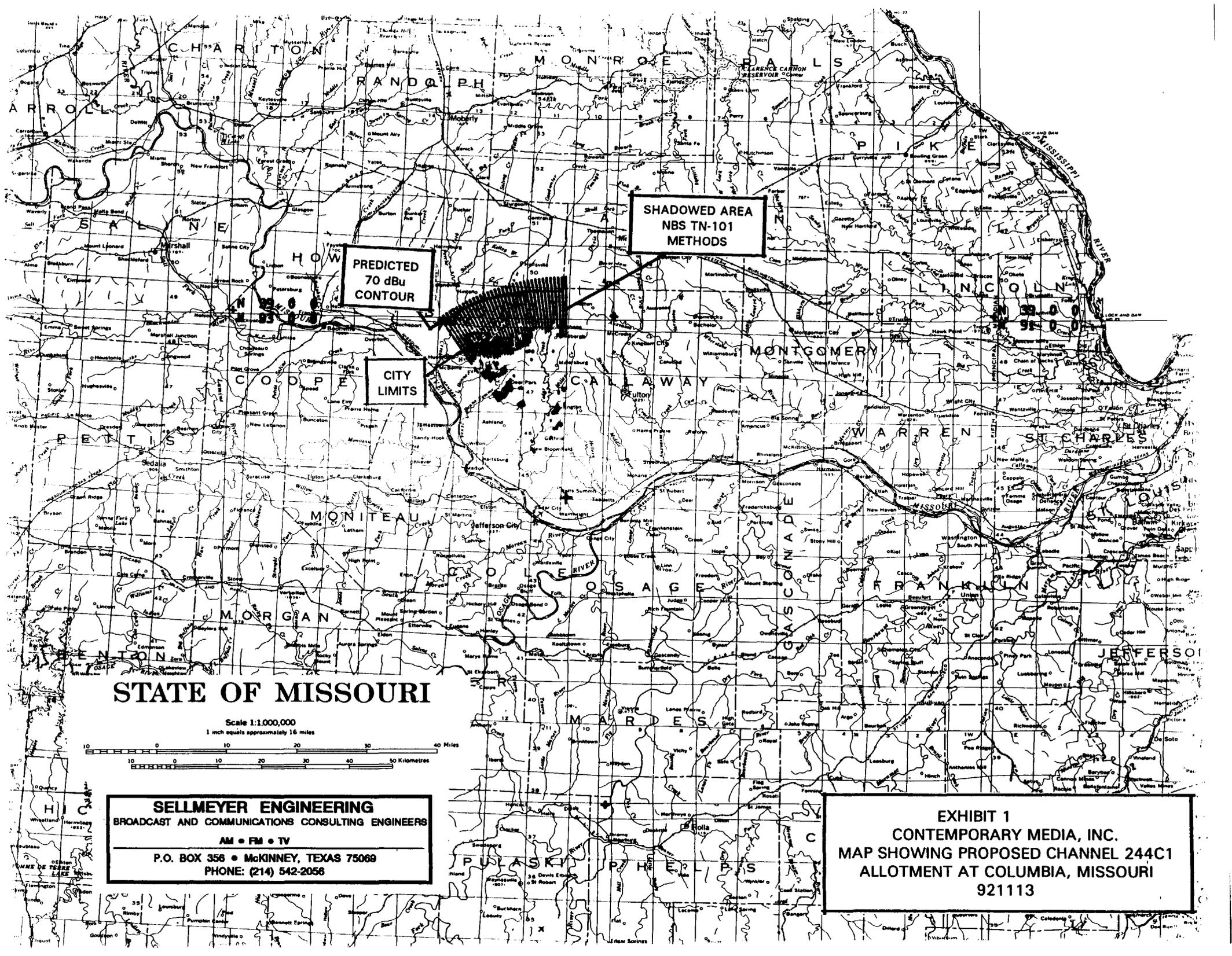
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below the required 70 dBu level, a line is drawn shading the area below the threshold. This shaded area is shown on the map of Exhibit 1. It may be clearly seen that no part of the City of Columbia, Missouri will receive city grade service from the proposed location.

The path profile of Exhibit 2 shows the intervening terrain between the proposed transmitter site and the reference point for Columbia, Missouri. A 0.6 first Fresnel zone clearance line is shown on the profile. It is evident from the profile that an inferior signal will be placed over the City of Columbia. In some areas, notably the southern portion of the city about 37 kilometers from the transmitter site, reception be completely obstructed due to terrain blockage. Thus, it will not be possible to comply with Section 73.315(b) of the Rules.

The proposed allotment may not be made at a site closer to the City of Columbia due to spacing restrictions for Station KZBK, Brookfield, Missouri and Station KXTR, Kansas City, Missouri.

It is poor Public Policy to allocate a facility which cannot comply with the Rules of the Commission and, thus, cannot provide adequate service to the City of License. For these reasons, the proposal of Greenfield should be denied.



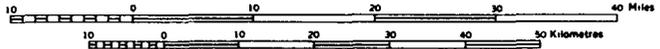
SHADOWED AREA
NBS TN-101
METHODS

PREDICTED
70 dBu
CONTOUR

CITY
LIMITS

STATE OF MISSOURI

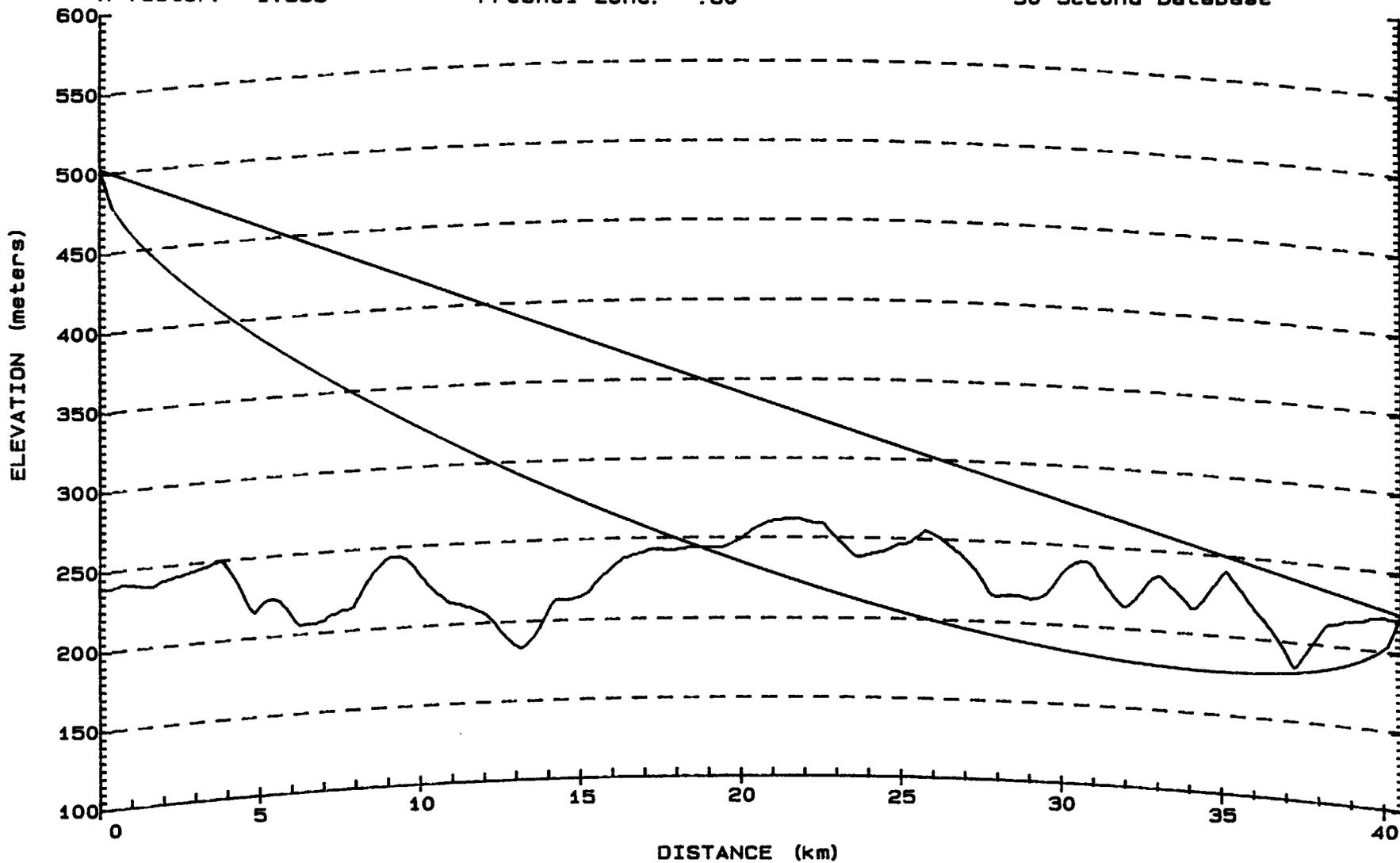
Scale 1:1,000,000
1 inch equals approximately 16 miles



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EXHIBIT 1
CONTEMPORARY MEDIA, INC.
MAP SHOWING PROPOSED CHANNEL 244C1
ALLOTMENT AT COLUMBIA, MISSOURI
921113

Transmitter coords: 38 37 40 92 7 0 Azimuth: 332.50 degs. Receiver Distance: 40.6 km
 Frequency: 96.7 MHz Transmitter Elevation: 503.0 m Receiver Elevation: 224.0 m
 Number of Obstacles: 0 Obstacle Loss: 5.3 dB Total Path Loss: 109.6 dB
 K factor: 1.333 Fresnel Zone: .60 30 Second Database



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EXHIBIT 2
 PATH PROFILE FROM PROPOSED
 KCMQ CHANNEL 244C1
 TO COLUMBIA, MO. REFERENCE POINT

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P. O. Box 356 McKinney, Texas 75069
MEMBER AFCCE
(214) 542-2056

CERTIFICATION OF ENGINEER

I hereby state that:

I am President of Sellmeyer Engineering

The Firm of Sellmeyer Engineering has been retained by Contemporary Media, Inc. to prepare this Engineering Exhibit

I am a graduate of Arizona State University with the degree of Bachelor of Science in Engineering

I am a Registered Professional Engineer in the States of Ohio and Texas

My qualifications as an Engineer are a matter of record with the Federal Communications Commission

This Engineering Exhibit was prepared by me personally or under my direct supervision, and

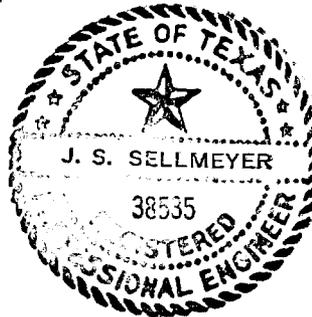
All facts stated herein are true and correct to the best of my knowledge and belief.



J. S. Sellmeyer, P. E.

November 13, 1992

P. O. Box 356
McKinney, Texas 75069
214-542-2056



CERTIFICATE OF SERVICE

I, Debra A. Williams, a secretary in the law offices of Rosenman & Colin, do hereby certify that on this 16th day of November, 1992, I have caused to be mailed, or hand-delivered, a copy of the foregoing "**ERRATUM TO COMMENTS AND COUNTERPROPOSAL OF LAKE BROADCASTING, INC.**" to the following:

Michael C. Ruger, Chief*
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 8322
Washington, D.C. 20554

Ms. Kathleen Scheuerle*
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 8314
Washington, D.C. 20554

Frank R. Jazzo, Esq.
Fletcher, Heald & Hildreth
1225 Connecticut Ave., N.W.
Suite 400
Washington, D.C. 20036-2847
COUNSEL FOR THE GREENFIELD GROUP



Debra A. Williams

***BY HAND**