

1 A That was one of the reasons, yes.

2 Q Okay. And I believe you testified that you  
3 only spoke to Mr. Freeman?

4 A Yes.

5 Q You never spoke to Clara Freeman?

6 A No.

7 Q You never spoke to Mary Freeman?

8 A No.

9 Q But you did speak on at least two or three  
10 occasions, it was your testimony, to Clyde Freeman?

11 A Yes.

12 Q Mrs. Stewart, do you know if Mr. Freeman,  
13 Mr. Clyde Freeman, is still alive?

14 A I heard that he is deceased. I am not  
15 positive of that.

16 Q Okay. So do you know when he may have died?

17 A No.

18 Q Okay. So when you told you sometime in 1989  
19 that he was going to call you up when interference was  
20 particularly bad for you to come and visit the house,  
21 you have no idea or reason to believe he may have been  
22 deceased in the meantime?

23 A No.

24 Q And that is the reason he hasn't called you?

25 A No.

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1 Q You had no reason to know that?

2 A No.

3 Q I believe it is your testimony at page 22 and  
4 23, paragraph 28, that Mr. Freeman, Mr. Freeman,  
5 complained to you primarily of interference to  
6 Channel 6?

7 A Yes.

8 Q When I say primarily, was that only? Did he  
9 mention any other channels to your recollection?

10 A Not that I recall.

11 Q Did he make -- okay. He did mention,  
12 however, that there was another TV set that needed  
13 fixing. Is that correct?

14 A Yes.

15 Q Is that your testimony here?

16 A Yes.

17 Q And that you gave him a filter to fix it?

18 A Yes.

19 Q In paragraph 34 on page 27 of your testimony,  
20 Mrs. Stewart, okay, it states there, your testimony  
21 describes what you saw on the television screen at Mr.  
22 Crutchfield's house?

23 A Yes.

24 Q Do you recall when you left what Channel 6  
25 looked like on the television set?

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1 A It was not coming in well.

2 Q When you say "not coming in well," what do  
3 you mean by that?

4 A It was snowy.

5 Q Okay. Were there any lines on the picture?

6 A I don't remember lines, but I do remember  
7 snow.

8 Q Okay. And was there any audio, KOKS audio,  
9 on any of the channels?

10 A No.

11 Q Is there anything particular about Mr.  
12 Crutchfield's house in terms of the site that would  
13 mean that he got worse or better TV reception than his  
14 neighbors?

15 A He really sits on the back side of the  
16 antenna. He sits on the side that is directional. You  
17 know, we are directional, and he sits on the back side  
18 of the directional.

19 Q Okay. So essentially he is located in the  
20 null of your antenna?

21 A Yes.

22 Q Is that correct?

23 A Yes.

24 Q So presumptively the amount of -- how far  
25 does Mr. Crutchfield live from your house?

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1           A     From the tower? I guess across the field a  
2 half a mile, maybe not that much.

3           Q     Okay. So he definitely was within the  
4 blanketing contour?

5           A     Yes.

6           Q     But he also lives within the null of your  
7 antenna, with less energy being generated than  
8 elsewhere. Is that correct?

9           A     Yes.

10          Q     Mrs. Stewart, I would like to refer you, if I  
11 may, to Mass Media Exhibit 5, page 11. This is a  
12 document that Mr. Shook referred to earlier.

13          A     Yes.

14          Q     Is it your testimony that you have a  
15 recollection of reviewing this petition prior to coming  
16 here today?

17          A     Yes.

18          Q     You did?

19          A     Yes.

20          Q     Do you recall when you saw this?

21          A     Probably some time within the time it got  
22 back to us. It could have been the last part of July,  
23 June or first part of July in '89.

24          Q     Okay. And you do have a recollection of  
25 reviewing this?

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1 A Yes.

2 Q Now you talked with Mrs. Durbin or Mrs.  
3 Durbin. Is it is Mrs. or Mrs.?

4 A Mrs.

5 Q Okay. On several occasions? Is that  
6 correct?

7 A I believe -- I don't believe I talked to her  
8 except maybe a time or two, but I made an appointment  
9 to go to her house.

10 Q Okay. And you visited her house, and your  
11 testimony is about that. Again, could you state for  
12 the record, Mrs. Stewart, when you reviewed this,  
13 whenever you reviewed it, June or July of 1989, did you  
14 do anything?

15 A No.

16 Q And why didn't you?

17 A I don't know. I guess I was just so busy  
18 with others that I just let this one get by me.

19 Q Now at that time, Mrs. Stewart, was there  
20 anyone else who was helping you resolve these  
21 complaints?

22 A No.

23 Q Was there anyone who was fielding any  
24 telephone calls for you?

25 A No.

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1 Q Was there anyone who was going out on visits  
2 with you?

3 A No.

4 Q Was there anyone who was buying filters with  
5 you or helping you with that?

6 A No.

7 Q Was there anyone who was taking any  
8 responsibility for this other than yourself?

9 A No, just myself.

10 Q Okay. We are talking about June, July and  
11 August, 1989?

12 A Yes.

13 Q Let's say June, July and August of 1989 to  
14 September of 1989?

15 A That was my responsibility.

16 MR. DUNNE: Your Honor, I think I am almost  
17 finished. May I just have a moment?

18 (Pause.)

19 BY MR. DUNNE:

20 Q Okay. Mrs. Stewart, may I direct your  
21 attention again to Mass Media Bureau Exhibit 21,  
22 Exhibit 16? Excuse me. Exhibit 21, page 16.

23 A Yes.

24 Q Okay. I believe it was your testimony  
25 earlier that you reported to the FCC in one of your

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1 | previous submissions that Mrs. Piper's problems were  
2 | cured and then you made this representation to the FCC.  
3 | Is that correct?

4 |       A     Yes.

5 |       Q     Now it says at the bottom of the page, the  
6 | last, "Mrs. Piper has since installed a booster." Do  
7 | you see that?

8 |       A     Yes.

9 |       Q     Do you recall how you learned that Mrs. Piper  
10 | installed a booster?

11 |       A     I don't really. I don't recall right now. I  
12 | just knew that she had, some way or another, had a  
13 | booster. I don't recall. I really don't, how I got  
14 | that information.

15 |       Q     Okay. And at that time, Mrs. Stewart, if  
16 | someone bought a booster, how did that affect what you  
17 | did to that person?

18 |       A     At that time? I believe my understanding was  
19 | that you would give them technical assistance.

20 |       Q     But you need not go to their house or you  
21 | need not provide them with any equipment? Is that  
22 | correct? Was that your understanding?

23 |       A     Yes, that's my understanding.

24 |       Q     Although if Mrs. Piper would have called you  
25 | up and asked you for a booster, a filter, as other

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1 | people have, you might given --

2 |           JUDGE STIRMER: I will sustain the objection  
3 | on my own motion. That is a hypothetical question.

4 |           MR. SHOOK: I think this may be the first  
5 | telepathic objection in history.

6 |           BY MR. DUNNE:

7 |           Q     Mrs. Stewart, I just want to make the record  
8 | clear on one point. Would you direct your attention to  
9 | Mass Media Bureau Exhibit 17, page 3?

10 |           A     Yes.

11 |           Q     Now you will note that you testified that  
12 | representation was made in there, and it is obvious  
13 | that the Hillis resolution wait because of the  
14 | unavailability of necessary filters. Is that correct?

15 |           A     Yes.

16 |           Q     Okay. But subsequently, it was subsequent to  
17 | this representation that you actually made a visit to  
18 | the Hillis home. Is that correct?

19 |           A     Yes.

20 |           Q     And it was either subsequent to or very close  
21 | to this date that the Hillises filed a lawsuit, people  
22 | filed a lawsuit of which the Hillises were a  
23 | complainant. Is that correct?

24 |           A     Yes.

25 |                     (Pause.)

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1 MR. DUNNE: I have nothing further, Your  
2 Honor.

3 JUDGE STIRMER: Recross, Mr. Shook?

4 MR. SHOOK: Yes, Your Honor.

5 RECROSS EXAMINATION

6 BY MR. SHOOK:

7 Q Mrs. Stewart, there has been some testimony  
8 about the advice you received from your local counsel  
9 subsequent to the filing of the lawsuit, and apparently  
10 this advice that you testified to held true while the  
11 lawsuit was in progress, that you shouldn't talk to the  
12 people involved in the lawsuit. Right?

13 A We did go ahead and look at the Hillises.

14 Q Okay.

15 A We did go ahead and make a visit to the  
16 Hillis home.

17 Q Right. With the exception of the Hillises,  
18 the general advice that you were given was, "You stay  
19 away from these people who are suing you." Right?

20 A Yes.

21 Q Now did you ever tell your FCC counsel about  
22 the local counsel's advice?

23 A I don't recall.

24 Q You don't recall asking FCC counsel, "How am  
25 I supposed to resolve this problem that I have, which

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1 | is, on the one hand, the FCC wants me to go cure these  
2 | complaints; on the other hand, my local counsel is  
3 | telling me, 'Don't talk to these people'?"

4 |       A     We mentioned that to Mr. Poole when he was  
5 | there, because we were already in the lawsuit when Mr.  
6 | Poole was there in May of 1989. And we mentioned the  
7 | fact, you know, that we were in this situation, and he  
8 | did not offer any suggestions or help in any way.

9 |       Q     Well, Mr. Poole isn't a lawyer. Right?

10 |       A     Right.

11 |       Q     I mean, he is not your lawyer?

12 |       A     No.

13 |       Q     He is an engineer?

14 |       A     He is an engineer. That's right.

15 |             JUDGE STIRMER: Well, the answer to the  
16 | question is, "No," you never asked Mr. Dunne.

17 |             THE WITNESS: Oh, I thought he wanted to know  
18 | if we asked an FCC official. I'm sorry. I  
19 | misunderstood your question. Did you say Mr. Dunne, or  
20 | did you say FCC official?

21 |             BY MR. SHOOK:

22 |       Q     No, FCC counsel.

23 |       A     FCC counsel?

24 |       Q     Okay. Now maybe I am using --

25 |       A     Yeah, right. I'm sorry.

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1 Q Your FCC lawyer, Mr. Dunne.

2 A Okay, all right. I don't recall if we did or  
3 not.

4 Q Okay. Did you ever seek a declaratory ruling  
5 from the FCC about what you were supposed to do with  
6 this situation?

7 A I don't recall.

8 Q Now you have mentioned that on April 27,  
9 1989, you made a home visit to Mary Wynn, and I believe  
10 you indicated that there was something about it that  
11 stuck in your mind and that was that Mrs. Wynn had  
12 mentioned some kind of health problem. Do you recall  
13 anything about Mrs. Wynn herself in terms of, you know,  
14 what she looks like and what kind of health she  
15 appeared to be in, you know, when you visited?

16 A She was having difficulty getting around at  
17 that time because there seemed to be a problem with  
18 either her hips or her legs or back or something in  
19 maybe the lower back. I don't know exactly for sure,  
20 but she was having some difficulty getting around.

21 Q Okay. Do you recall whether on that  
22 particular day you visited several homes in succession,  
23 or was Mrs. Wynn the only home that you went to on that  
24 day?

25 A I don't recall, sir.

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1 Q Okay. Now I would like to direct your  
2 attention to Mass Media Exhibit No. 21, page 62. All  
3 right. Now do you see the reference there at the top?

4 A Are you talking about Mrs. Piper's?

5 Q Yes, ma'am.

6 A Yes.

7 Q Okay. April 27, 1989?

8 A Okay.

9 Q All right. Do you remember this visit?

10 A Going to Mrs. Piper's? Yes. They live close  
11 together there in the trailer court.

12 Q Okay. Now turning to page 81 of that  
13 exhibit.

14 A Page 81? Yes.

15 MR. DUNNE: Excuse me, Your Honor. Should we  
16 go off the record for a moment?

17 JUDGE STIRMER: Off the record.

18 (Off the record.)

19 (Back on the record.)

20 JUDGE STIRMER: On the record.

21 BY MR. SHOOK:

22 Q All right. Now you have seen page 81?

23 A Yes.

24 Q And do you see the reference at the top?

25 A Yes.

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1 Q Now does this help clarify what happened on  
2 that day? Did you go from Mrs. Piper's house to Mrs.  
3 Wynn's house?

4 A At 3:30 and this one at 3 p.m. That would,  
5 yes, that would look like that is what I did.

6 Q Well, I mean, do you remember that that is  
7 what you did?

8 A I really don't recall the exact dates, you  
9 know, but except that I have to go back to a reference  
10 like this.

11 Q Okay.

12 A Because it is hard to keep those, all of  
13 those dates in your mind.

14 Q All right. Now other than using the services  
15 of Mr. Lampe in 1991 and the use of Mr. Abernathy, I  
16 guess it was, in late 1988, you were the only person  
17 involved in actually providing filters to people or  
18 installing filters, trying to restore service? Right?

19 A Yes.

20 Q Now did you feel as if you were overburdened  
21 or overworked in terms of trying to deal with these  
22 blanketing complaints?

23 A At times, yes.

24 Q Was there any particular reason why you  
25 didn't use Mr. Lampe or hire someone else?

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1           A     1989 was a very hard year financially. There  
2 was a lot of expenses because of the problems with the  
3 antenna, and there just was not enough money to hire  
4 him.

5           Q     All right. So no one was hired to help you  
6 in 1989 primarily because of money?

7           A     That's right.

8           Q     All right. What about in 1990? Did you have  
9 the same problems in 1990?

10          A     In 1990? I don't recall really about 1990.  
11 1989 was the harder year.

12          Q     Now with respect to -- let me refer your  
13 attention to Mass Media Exhibit No. 16. Or excuse me,  
14 No. 21, page 16.

15          A     Twenty-one? Yes.

16          Q     Okay. And the reference to Leatha Piper?

17          A     Yes.

18          Q     No. 65? Now you found out that she had a  
19 booster from a complaint that she had filed with the  
20 station, did you not?

21          A     Could have possibly been. I really don't  
22 recall.

23                   MR. SHOOK: All right. Your Honor, I am  
24 placing before the witness what has been identified as  
25 Mass Media Exhibit, I think it is No. 29. It is just

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1 marked for identification at this point. Pages 5 and  
2 6.

3 BY MR. SHOOK:

4 Q Now I know it is a little difficult to read,  
5 so why don't you take your time and specifically focus  
6 on page 6.

7 A Page 6? All right. Does she mention the  
8 booster here? Am I missing it somewhere? It must be  
9 that I am missing it somewhere. Here it is, right  
10 here. He said "tried."

11 Q Do you see the reference to the booster  
12 there?

13 A Yes. She said that he tried.

14 Q Do you also see who was doing it?

15 A Yes.

16 Q And who was trying the booster?

17 A Yes.

18 Q It was Charlie, right?

19 A Yes, that is correct.

20 Q And he was working for you then?

21 A Sir?

22 Q Charlie was working for you then? Right?

23 A He was a contract engineer.

24 Q Right. Did you ever discuss this matter with  
25 Mr. Lampe?

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1           A     I don't recall. It could have been mentioned  
2 in passing. I don't know.

3           MR. SHOOK: All right. I have nothing  
4 further on that.

5           BY MR. SHOOK:

6           Q     Now I believe that you and Mr. Dunne  
7 discussed in your redirect testimony that there were a  
8 number of complaints that were difficult to read  
9 because they weren't the original of the complaint.  
10 They may not have even been the first copy of the  
11 complaint, but a copy of a copy. Now you knew, though,  
12 from the first batch of complaints where these  
13 complaints were coming from, did you not, in terms of  
14 the people who were funneling them to the FCC?

15          A     Are you talking about Mrs. Smith and Mrs.  
16 Hillis?

17          Q     Yes, ma'am.

18          A     Yes.

19          Q     Okay. Did you ever contact either Mrs. Smith  
20 or Mrs. Hillis to try to find out who a particular  
21 complainant might be when you had difficulty  
22 ascertaining it from the complaint itself?

23          A     Not that I recall.

24          MR. SHOOK: Your Honor, I have no further  
25 questions.

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1 JUDGE STIRMER: All right. May the witness  
2 be excused?

3 MR. DUNNE: Yes, Your Honor.

4 JUDGE STIRMER: Thank you very much,  
5 Mrs. Stewart. You are excused.

6 (The witness was excused.)

7 JUDGE STIRMER: That completes the  
8 cross-examination of your witnesses, Mr. Dunne, except  
9 for the possibility of recalling Mr. Stewart?

10 MR. DUNNE: That is correct, Your Honor, and  
11 I anticipate that there may be some rebuttal testimony.

12 JUDGE STIRMER: All right.

13 MR. SHOOK: Your Honor, at this time I would  
14 introduce into evidence the 10 pages of documents that  
15 have been previously identified as complaints from  
16 Leatha Piper, and I believe that they are marked for  
17 identification as Mass Media Exhibit No. 29.

18 JUDGE STIRMER: Are there any objections?

19 MR. DUNNE: No, Your Honor.

20 JUDGE STIRMER: All right. Mass Media  
21 Exhibit 29 is received.

22 (The document previously  
23 identified as Mass Media  
24 Exhibit No. 29 was received  
25 into evidence and made a part

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1 of the record thereof.)

2 MR. SHOOK: Your Honor, I would also move  
3 into evidence proposed Mass Media Exhibit No. 30, which  
4 are the six pages of documents relating to the  
5 complaint submitted by the Ellises.

6 JUDGE STIRMER: Any objections?

7 MR. DUNNE: No, Your Honor.

8 JUDGE STIRMER: All right. Exhibit 30 is  
9 received.

10 (The document previously  
11 identified as Mass Media  
12 Exhibit No. 30 was received  
13 into evidence and made a part  
14 of the record thereof.)

15 MR. DUNNE: And while we are at it, Your  
16 Honor, I would like to move the admission into evidence  
17 of what has been marked and identified KOKS Exhibit No.  
18 11.

19 JUDGE STIRMER: Any objection?

20 MR. SHOOK: Your Honor, only with one  
21 proviso, and that is because the document relates to an  
22 apparent activity of either Mrs. Smith or Mrs. Hillis,  
23 both of whom are scheduled to testify as witnesses,  
24 that it should be verified by one of them before coming  
25 in.

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1 JUDGE STIRMER: All right.

2 MR. DUNNE: Your Honor, this is -- the  
3 specific questions dealt with the witness's belief  
4 about Channel 6.

5 JUDGE STIRMER: All right.

6 MR. DUNNE: Whether it was from Mrs. Smith or  
7 Mrs. Hillis is really irrelevant. And they will be  
8 asked about this when they testify.

9 JUDGE STIRMER: All right. I will receive  
10 KOKS Exhibit 11.

11 (The document previously  
12 identified as KOKS Exhibit No.  
13 11 was received into evidence  
14 and made a part of the record  
15 thereof.)

16 JUDGE STIRMER: All right. Mr. Shook, do you  
17 have a witness here present now?

18 MR. SHOOK: Yes, Your Honor, I believe I do,  
19 and I would like to go out and get her.

20 JUDGE STIRMER: Very well.

21 MR. DUNNE: Your Honor, may we take a short  
22 break, or should we go on now?

23 JUDGE STIRMER: All right. Let's take a two-  
24 or three-minute break.

25 (Whereupon, a brief recess ensued.)

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1 JUDGE STIRMER: Mr. Shook, would you present  
2 your witness? Would you identify her, please?

3 MR. SHOOK: Your Honor, this is Mary J. Wynn.

4 JUDGE STIRMER: Ms. Wynn, would you please  
5 raise your right hand and be sworn?

6

7 Whereupon,

8

MARY J. WYNN

9 having been first duly sworn, was called as a witness  
10 herein and was examined and testified as follows:

11 JUDGE STIRMER: Would you have a seat,  
12 please, ma'am? Now your written testimony has been  
13 received in evidence, your direct testimony, and you  
14 are going to be available for cross-examination by Mr.  
15 Dunne.

16 THE WITNESS: All right.

17 JUDGE STIRMER: All right.

18 MR. SHOOK: Your Honor, just one second.

19 DIRECT EXAMINATION

20 BY MR. SHOOK:

21 Q Mrs. Wynn or Ms., is it Ms. Wynn?

22 A Mrs.

23 Q Mrs. Wynn? Okay. We have two binders up  
24 there, and your testimony is in Mass Media Bureau  
25 Exhibit No. 10. Do you want me to help you locate

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1 | that?

2 | JUDGE STIRMER: Why don't you do that, Mr.

3 | Shook?

4 | THE WITNESS: One says "Witness Copy." Well,  
5 | they both are. All right.

6 | JUDGE STIRMER: Mr. Dunne.

7 | MR. DUNNE: Yes. I am sorry for my slowness  
8 | this afternoon. I am just slowing up.

9 | CROSS-EXAMINATION

10 | BY MR. DUNNE:

11 | Q Mrs. Wynn, my name is Joseph Dunne. I am the  
12 | attorney representing Calvary Educational Broadcasting  
13 | in this proceeding. I am going to be asking you some  
14 | questions, and then Mr. Shook will probably be asking  
15 | you some questions on redirect. I want to make clear  
16 | that if you don't hear me or you don't understand my  
17 | questions, please let us know.

18 | A All right.

19 | Q The purpose here is to get your complete and  
20 | correct answers on the record. So if you can't hear me  
21 | or you don't understand what my question is, please  
22 | feel free to let us know that. Mrs. Wynn, your  
23 | testimony is that you resided at Route 6, Box 93?

24 | A Yes.

25 | Q And do you still live there?

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1 A No.

2 Q Where do you live now?

3 A I live in Bull Shoals, Arkansas.

4 Q Okay. Well, I presume that is beyond the  
5 blanketing contour of KOKS. Is that correct?

6 A Yes.

7 Q And when did you move to Arkansas?

8 A October the 3rd of this year.

9 Q Of 1992?

10 A 1992.

11 Q So you just moved?

12 A Yes.

13 Q And the mobile home park you lived in was  
14 called Camelot Estates?

15 A Yes.

16 Q And that was approximately a quarter of a  
17 mile from KOKS. Is that correct?

18 A Yes.

19 Q How far is that from -- do you know where the  
20 Highway Patrol station is?

21 A Yes.

22 Q How close is that?

23 A More or less right across the highway. It's  
24 a little bit farther north than what we were, but you  
25 know.

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1 Q Roughly, how far is the Highway Patrol tower  
2 from you, to the best of your knowledge?

3 A I don't know. It's farther than the radio  
4 tower.

5 Q Okay. Less than two miles?

6 A Yes.

7 Q Do you know where the Channel 15 TV tower is?

8 A Yes.

9 Q And where is that?

10 A That is --

11 Q From the location of where you live, or where  
12 you did live?

13 A Okay. That was south on Highway 67.

14 Q And roughly how far away was that?

15 A Well, let's see. That would have been two  
16 miles, I believe.

17 Q So it would be fair to say that you are  
18 located within two miles of three different towers. Is  
19 that correct? Don't let me put words in your mouth.

20 A Within two miles?

21 Q Of the KOKS tower and the Highway Patrol  
22 tower and the Channel 15 tower.

23 A Of the two, of KOKS and the Highway Patrol, I  
24 am sure is less than two.

25 Q Okay.

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1           A     But the other one, I believe, would be just  
2 about exactly two miles, Channel 15. It is hard to  
3 tell. The one intersection is a mile from my -- was a  
4 mile from my house. And this was another, it was  
5 farther than that down the road, 15 was.

6           Q     Okay. You say your antenna was in a fixed  
7 position toward Cape Girardeau. What TV channel is  
8 located in Cape Girardeau?

9           A     Channel 12, KFBS.

10          Q     Okay. Were there any other television  
11 channels that you wished to view that were in the same  
12 direction?

13          A     Paducah was more or less in that direction.

14          Q     Okay. You testify, Mrs. Wynn, that prior to  
15 KOKS going on the air, you watched Channel 6, 8, 12 and  
16 15. Is that correct?

17          A     Yes.

18          Q     And Channel 12, you just testified, is in  
19 Cape Girardeau. What direction is that roughly, if you  
20 know?

21          A     I believe that is a little bit northeast of  
22 where I lived.

23          Q     Okay. Now you say that the antenna was in a  
24 fixed position. Was that a directional antenna, to  
25 your knowledge? To your knowledge.

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1           A     I don't know what a fixed antenna is. It is  
2 just an antenna that is up in the air with cross pieces  
3 running longways this way, and one end was aimed toward  
4 the Cape, in that direction.

5           Q     Okay. Now do you where Channel 8 is located  
6 by comparison to Channel 15 -- excuse me, Channel 12?

7           A     It would be more or less southeast. It would  
8 be Jonesboro, Arkansas.

9           Q     Okay. And, in other words, it is roughly in  
10 the other direction from Channel 12?

11          A     Well, it would be aimed -- you know, if the  
12 Cape is this way, it would be aimed -- Jonesboro would  
13 be more down this, like in that direction.

14          Q     Okay. You said before KOKS began  
15 broadcasting, Channel 6, 8, 12 and 15. Correct?

16          A     Yes.

17          Q     Okay. Prior to KOKS going on, you don't know  
18 if -- if I use the word "ghosting," do you know what  
19 "ghosting" means on a TV set?

20          A     It would be shadows.

21          Q     Okay. Essentially it would be images that  
22 are kind of superimposed so that you are going to see  
23 two men rather than one?

24          A     Yes.

25          Q     Okay. And we can agree on that as a

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