ORIGINAL

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

In the Matter of	)	MM Docket No. 92-244
	)	92-245
Amendment of § 73.202(b)	)	92-247
Table of Allotments	)	RM-8183
FM Broadcast Stations	)	
Charlotte Amalie, VI; Cruz Bay, VI;	)	
Frederiksted, VI; Christiansted, VI;	)	
Aguada, PR; Gurabo, PR; Utuado, PR;	)	
San Juan, PR; Ponce, PR and Carolina, PR)		

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS

Radio Redentor, Inc., licensee of FM Station WERR, Utuado, Puerto Rico ("WERR"), by its counsel and pursuant to § 1.420 of the Commission's Rules, hereby submits its Reply Comments in response to the Commission's Public Notice, Report No. 1927, released on February 17, 1993, and states as follows:

I. Background

1. On January 4, 1993, WERR was one of four Joint Commenters that filed comments and a counterproposal in MM Docket Nos. 92-244, and 92-245. [1/] The Joint Commenters filed the identical counterproposal in a related docket, MM Docket No. 92-247 on January 7, 1993. The essence of the Joint Commenters counterproposal was to amend the FM Table of Allotments by changing WERR's community of license from Utuado, PR to Gurabo, PR, providing Gurabo with its first local transmission service, and upgrading FM Station WNNV, the only local transmission service licensed to Agauda, PR from a Class A to a Class B1 facility,

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[1/] The other Joint Commenters were El Mundo Broadcasting Corporation, licensee of FM Station WKAQ, San Juan, PR; Estereotempo, Inc., licensee of FM Station WIOC, Ponce, PR; and Aurio Matos, licensee of FM Station WNNV, Aguada, PR.

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improving the service it provides to that community and its environs.

2. In addition to the Joint Commenters counterproposal, Paradise Broadcasting Corporation, permittee of FM Station WDCM, Cruz Bay, Virgin Islands, filed a counterproposal in MM Docket No. 244, proposing the substitution of Channel 267B for Channel 246B there.

3. Reply Comments to the Joint Commenters counterproposal were filed by Calypso Communications, permittee of FM Station WVNX, Charlotte Amalie, VI ("WVNX"); Jose J. Arzuaga, petitioner for Channel 298A at Frederiksted, VI ("Arzuaga"), Virgin Islands Stereo Communications Corp, licensee of FM Station WVIS, Christiansted, VI ("WVIS") and Carlos J. Colon-Ventura, licensee of FM Station WSAN, Vieques, PR ("WSAN") (collectively the "Reply Commenters"). The gist of the reply comments was that the change in community of license proposed by WERR would not result in most preferential arrangement of allotments. The within Reply Comments respond to those "Reply Comments" agreeably with the procedure specified in Report No. 1927, supra.

II. Discussion

4. In proposing to allow WERR to change its community of license, the Joint Commenters relied on the policy enunciated in the FCC's Amendment of Commission's Rules Concerning Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870, 66 RR 2d 877 (1989), recon., 5 FCC Rcd 7094 (1990) (the "Community of License Order" and the "Reconsideration Order".

respectively). The Commission there acknowledged that "provision of first local service is the highest of our allotment priorities which remains in any significant degree unsatisfied." Reconsideration Order, 5 FCC Rcd at 7096. WERR's proposed change in community of license from Utuado to Gurabo would help further this important allotment policy.

5. Utuado, where WERR is presently licensed, already has a full- time local aural service in addition to WERR. [2/] Gurabo, the community that WERR seeks to amend its license to serve, has no local broadcast outlet. Gurabo was presented in the counterproposal as a community with a 1990 census population of 9,199 that is governed by an "Alcalde" or Town Governor, working with an elected assembly. According to the information in the counterproposal, Gurabo had its own zip code, public schools, police, fire department, local hospital, retail outlets and office buildings. Thus, the Joint Commenters concluded, Gurabo was a "community" for FCC allotment purposes. See, Revision of FM Assignment Policies and Procedures, 90 F.C.C. 2d 88, 101 (1982).

6. The Reply Commenters do not dispute the fact that Gurabo is an independent community for allocation purposes. They offer only one argument; that Gurabo is part of the Caguas Urbanized Area, which in turn is part of the San Juan-Caguas Consolidated Metropolitan Statistical Area, and argue that for just such reason alone, the proposed change of community of license should not be

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[2/] WUPR(AM), 1530 kHz, 1 kw D, 250 w N.

granted. [3] The Reply Commenters cite no direct legal support for their conclusion. The Reply Commenters argument cannot stand when analyzed against Commission precedent.

7. The Reply Commenters, in effect, ask the Commission to impose the Huntington Doctrine exception to the usual Section 307(b) presumption that every community needs at least one local transmission service, and find that the allocation to Gurabo would not further allotment priorities. [4] In fact, the burden of proof is on the Reply Commenters to show that Gurabo is not entitled to a local transmission facility. The U.S. Court of Appeals has specifically cautioned that a party seeking to invoke the Huntington exception may not resort to a "metropolitan area" presumption in order to meet its burden of proof. New Radio Corp. v. FCC, 804 F.2d 756, 760-1 (D.C. Cir. 1987). In this case, the Reply Commenters have not met their burden.

8. The three factors that the Commission examines to determine whether to award a first local service preference are: (1) signal population coverage, which is the degree to which the station will not only serve the smaller community, but will also serve the larger community; (2) the size of the smaller community with respect to the Urbanized Area, and (3) the independence or

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[3] The counterproposal, aside from allowing WNNV to upgrade and increase by 8% the population it would serve within its 1.0 mV/m contour, would also increase the population served in the predicted 1.0 mV/m contours of the other two Joint Commenters stations as well. Neither of these "other public interest" benefits of the counterproposal were disputed by the Reply Commenters.

[4] Huntington Broadcasting Co. v. FCC, 192 F.2d 33, 35 (D.C. Cir. 1951)

interdependence of the community in question with the urbanized area. Faye and Richard Tuck, 3 FCC Rcd 5373, 5378, 65 RR 2d 402 (1988). Although WERR concedes that there is a likelihood that the relocated station would also place a signal over Caguas, it also notes that Gurabo's "zona urbano" population of 9,199 people represents approximately 10% of the 92,429 people that make up the Caguas Urbanized Area. [5/]

9. In a Huntington analysis, however, the Commission has held that the relationship between the smaller community and the larger community is the most critical consideration. Id. In assessing the independence of the smaller community from the larger community, the Commission considers the following criteria:

> (1) the extent to which community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's local needs and interests; (3) whether the community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the specified community has its own local government and elected officials; (5) whether the smaller community has its own telephone book provided by the local telephone company or zip code; (6) whether the community has its own commercial establishments, health facilities and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising market; and (8) the extent to which the specified community relies on the larger metropolitan area

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[5/] By contrast, in RKO General. Inc. (KFRC), 5 FCC Rcd 3222, 67 RR2d 1428 (1990), the Commission invoked the Huntington Doctrine in the case of a community, Richmond, California, that constituted only 2.34% of the San Francisco-Oakland Urbanized Area. See, Id. (Rev. Bd. Decision) 66 RR 2d 1236, 1242-3 (¶ 18) (Rev. Bd. 1989). More recently, in a change of community of license case, the Allocations Branch ruled that an allocation to Rollingwood, Texas, would not serve Commission allocation goals because its population of 1400 did not compare favorably with the 345,496 people that comprise the Austin Urbanized Area. Bay City, Brenham, et al., DA 93-131, released March 2, 1993.

for various municipal services such as police, fire protection, schools and libraries. Id.

An analysis of these factors leads to the conclusion that Gurabo is sufficiently independent from Caguas to deserve a local transmission facility.

10. With respect to factor (1), U.S. Census Bureau statistics are not available yet. As for factor (2), Gurabo does not have its own daily or weekly newspaper. Attached as Exhibit 1 is a letter, with attachments, from the Alcalde of the Municipio of Gurabo where which lists all of the independent services and facilities that Gurabo provides to its citizens. This is fairly strong circumstantial evidence of how the community leaders must feel for factor (3) and it also speaks to factors (4), (6) and (8).

11. The Alcalde's letter offers evidence that Gurabo has its own government, in compliance with the laws of the Commonwealth of Puerto Rico. Reply Commenters have not disputed the Joint Commenters assertion that Gurabo is governed by an Alcalde who works with elected members of the Asamblea Municipal. Gurabo, according to the Alcalde, has the Office of the Mayor, Municipal Assembly, Civil Defense, Police (Guardia Municipal) and Public Works (Obras Publicas Municipal). Gurabo also has offices for these Commonwealth-run services: Aqueduct Authority (Autoridad de Acueductos y Alcantarillados); Fire Department (Cuerpo de Bomberos); State Elections Commission (Comision Estatal de Elecciones); Communications Corporation (Corporacion de Comunicaciones); State Civil Defense Agency (Agencia Estatal de Defensa Civil); Department of Education (Departamento de

Educacion); Agricultural Extension (Servicio de Extencion Agricola); National Guard (Guardia Nacional) Department of Finance -- Office of the Tax Collector (Departamento de Hacienda); State Police (Policia de Puerto Rico); and Public Health (Departamento de Salud Publica). In addition, its own school district consisting of 17 schools.

III. Conclusion

12. The fact that Gurabo represents approximately 10% of the population of the Urbanized Area that it is a part of, coupled with the factors demonstrating its independence from Caguas lead to the conclusion that the change of community that WERR request should be granted.

WHEREFORE, it is respectfully requested that the counterproposal to change the community of license of WERR-FM from Utuado, PR to Gurabo, PR be adopted and the FM Table of Allotments amended accordingly.

Respectfully submitted,

Scott Cinnamon
Counsel for Radio Redentor, Inc.

1901 L Street, N.W.
Suite 200
Washington, D.C. 20036
(202) 659-4401

March 4, 1993

TRANSLATION AND SUMMARY OF DOCUMENTS

1. Immediately attached is a letter dated February 5, 1993 from the Hon. Victor Rivera Acevedo, Mayor of Gurabo, that reads as follows:

> "By this letter, I hereby place on the record that the town of Gurabo is a municipality established in accordance with the requirements of the Law of Autonomous Municipalities of Puerto Rico, Law No. 81 of August 30, 1991, and has all proper legal capacity.
>
> "Cordially,
>
> "/s/
> "Hon. Victor Rivera Acevedo"

2. Attached to Mr. Rivera Acevedo's letter are the following documents:

a. A "Guide of Municipal Services" (Guia de Servicios Municipales) that lists all municipal offices including the Office of the Mayor, Municipal Assembly, Civil Defense, Police (Guardia Municipal) and Public Works (Obras Publicas Municipal);

b. A "List of Schools in the Scholastic District of Gurabo" (Lista de Escuelas del Distrito Escolar de Gurabo) that lists all the elementary, secondary and vocational schools in the Gurabo District.

c. A "Guide to State Services" (Guia de Servicios Estatales) that lists all the offices of the Commonwalth of Puerto Rico with offices in Gurabo, including the Aqueduct Authority (Autoridad de Acueductos y Alcantarillados); Fire Department (Cuerpo de Bomberos); State Elections Commission (Comision Estataaal de Elecciones); Communications Corporation (Corporacion de Comunicaciones); State Civil Defense Agency (Agencia Estatal de Defensa Civil); Department of Education (Departamento de Educacion); Agricultural Extension (Servicio de Extencion Agricola); National Guard (Guardia Nacional) Department of Finance -- Office of the Tax Collector (Departamento de Hacienda); State Police (Policia de Puerto Rico); and Public Health (Departamento de Salud Publica);

d. A "Guide to Federal Services" (Guia de Servicios Federales), including a U.S. Post Office (00778) and the U.S. Internal Revenue Service (Departamento del Tesoro -

- Rentas Internas).

e. A "List of Churches in Gurabo" (Listado de Iglesias de Gurabo).

MUNICIPIO DE GURABO

Lcdo. Víctor Rivera Acevedo
Alcalde

5 de febrero de 1993

Por la presente hago constar que el pueblo de Gurabo, es un municipio establecido a tono con las disposiciones de la Ley de Municipios Autónomos de Puerto Rico, Ley num. 81 del 30 de agosto de 1991, y ostenta capacidad jurídica propia.

Cordialmente

Hon. Víctor Rivera Acevedo

Apartado Postal 317 Gurabo, Puerto Rico 00778 • Tel. 737-8411 / Fax 737-5161

GUIA DE SERVICIOS MUNICIPALES

Casa Alcaldía

Recepción	737 8411
Oficina del Alcalde	203
Oficina del Vice Alcalde	204
Oficina del Ayudante	223
Secretaría Municipal	229
Finanzas	205
Tesorería	224
Relaciones Públicas	230
Oficina de Personal	222
Centro de Cómputos	226
Programa Arco	225
Asamblea Municipal	228
Guardia Municipal	234
Depto. Arte y Cultura	227
Defensa Civil	231
Programas Federales	218
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TODAS LAS DEPENDENCIAS MUNICIPALES RECIBEN SU CORRESPONDENCIA A LA SIGUIENTE DIRECCION:

Apartado 317
Gurabo, PR 00778

Teléfonos Directos

Oficina del Alcalde
Teléfono: 737 2251

Finanzas
Teléfono: 737 5161

Centro de Envejecientes
Teléfono: 737 5436

Consorcio Caguas Guayama
Teléfono: 737 7524

Corporación Municipal de Servicios Educativos, Inc.
Teléfono: 737 7610

Defensa Civil
Teléfono: 737 3459

Guardia Municipal
Teléfono: 737 5505

Obras Públicas Municipal
Teléfono: 737 8375

Recreación y Deportes
Teléfono: 737 4204

Vivero Municipal
Teléfono: 737 3122

ESTADO LIBRE ASOCIADO DE PUERTO RICO

GOBIERNO MUNICIPAL
APARTADO 317
GURABO, PUERTO RICO 00778

OFICINA DE RELACIONES PUBLICAS
TEL. 737-8411 EXT. 230

PEDRO J. COLON
OFICIAL DE RELACIONES PUBLICAS

2 de febrero de 1993

LISTA DE ESCUELAS DEL DISTRITO ESCOLAR DE GURABO

ESC. MATIAS GONZALEZ GARCIA
CALLE ANDRES ARUZ RIVERA
TELEFONO 737-2056

ESC. SEGUNDA UNIDAD DE CELADA
CARRETERA 181 BO. CELADA
TELEFONO 737-2626

ESC. DE RINCON
CARRETERA NUM. 30 BO. RINCON
TELEFONO 737-6463

ESC. S.U. NAVARRO
BO. NAVARRO
TELEFONO 737-2323

ESC. HATO NUEVO
CARRETERA 944 BO. HATO NUEVO
TELEFONO 737-4347

ESC. DE JAGUAS
CARRETERA 941 BO. JAGUAS
TELEFONO 737-6066

ESC. CELADA CARRETERA
CARRETERA 181 BO. CELADA CARRETERA
TELEFONO 737-4346

ESC. SANTA RITA
CARRETERA 181 BO. SANTA RITA
TELEFONO 737-6222

ESC. DRA. CONCHITA CUEVAS
TELEFONO 737-2700

ACADEMIA MILITAR
TELEFONO 744-7900

ESC. LUIS MUÑOZ RIVERA
CALLE MATIAS GONZALEZ GARCIA
TELEFONO 737-2216

ESC. CAMPAMENTO
BDA. CAMPAMENTO
TELEFONO 737-8366

ESC. MARGARITA RIVERA DE JANER
CALLE SAN ANTONIO
TELEFONO 737-6594

CENTRO PRE-VOCACIONAL
CALLE SAN ANTONIO
TELEFONO 737-6093

ESC. VILLA MARINA
URB. VILLA MARINA
TELEFONO 737-4344

ESC. S.U. CELADA
BO. CELADA CARRETERA 943
TELEFONO 737-6196

COLEGIO BAUTISTA
CALLE ANDRES ARUZ RIVERA FINAL
TELEFONO 737-4949 ** 737-8365

GUIA DE SERVICIOS ESTATALES

Autoridad de Acueductos y Alcantarillados

Planta de Tratamiento
Carretera 941 Km 0.6
Barrio Jaguas
Gurabo, PR 00778

Teléfono: 737 3001

Cuerpo de Bomberos

Calle San José
Número 50
Gurabo, PR 00778

Teléfono: 737 2121

Comisión Estatal de Elecciones

Calle Matías González García
Número 153
Gurabo, PR 00778

Teléfono: 737 2506

Corporación de Comunicaciones

Calle San José
Esquina Angel C. Morales
Gurabo, PR 00778

Teléfono: 737 3737

Agencia Estatal de Defensa Civil

Carretera 189 (salida hacia Caguas)
Gurabo, PR 00778

Teléfono: 737 5021

Departamento de Educación

Oficina del Superintendente
Edificio Gubernamental
Segundo piso
Gurabo, PR 00778

Teléfono: 737 2151

Autoridad de Energía Eléctrica

Teléfono: 737 2001

Servicio de Extención Agrícola

Centro Gubernamental
Segundo piso
Gurabo, PR 00778

Teléfono: 737 3241

Guardia Nacional

Campamento O'Reilly
Gurabo, PR 00778

Teléfono: 737 8105

Departamento de Hacienda

Colecturía de Rentas Internas
Centro Gubernamental
Primer Piso
Gurabo, PR 00778

Teléfono: 737 2531

Tribunal de Justicia

Calle Angel C. Morales
Gurabo, PR 00778

Teléfono: 737 2136

Policía de Puerto Rico

Cuartel de la Policía
Centro Gubernamental
Gurabo, PR 00778

Teléfono: 737 2020

Academia de Ciencias Policiales
Campamento O'Reilly
Gurabo, PR 00778

Teléfono: 737 3351

Departamento de Salud Pública

Centro de Medicina de Familia
Calle San Antonio (final)
Carretera 941
Gurabo, PR 00778

Teléfono: 737 2311 ó 737 7731
737 2550 (emergencia)

Departamento de Salud Pública
continuación

Programa de Asistencia Médica

Teléfono: 737 4831

Registro Demográfico

Teléfono: 737 4244

Departamento de Servicios Sociales

Oficina de Servicios
Calle Andrés Arus Rivera
Gurabo, PR 00778

Teléfono: 737 5396 ó 737 8322

Programa de Asistencia Nutricional

Teléfono: 737 6451

Rehabilitación Vocacional

Teléfono: 737 5396

Sub Estación Experimental

Carretera 189
(Salida hacia Caguas)
Gurabo, PR 00778

Teléfono: 737 3511

Transportación y Obras Públicas

Carretera 181
(Frente al Centro de Envejecientes)
Barrio Celada
Gurabo, PR 00778

Teléfono: 737 6341

Departamento de la Vivienda

Res. Luis del C. Echevarría
Calle Andrés Arus Rivera
Carretera 41
Villa Marina
Gurabo, PR 00778

Teléfono: 737 3071

GUIA DE SERVICIOS FEDERALES

Guardia Municipal de Puerto Rico

Co. "C" (S&T) Orderly Room

Teléfono: 737 8492

Cía. A1 ST BN 295th Inf.

Teléfono: 737 2120

Office of the Organization
Maintenance Shop Chief

Teléfono: 737 2800

Servicio Postal de los Estados Unidos de América

Calle Angel C. Morales
y Matías González García
Gurabo, PR 00778

Teléfono: 737 3191

Departamento del Tesoro

Rentas Internas
Servicio al Contribuyente

Teléfono: 766 5549 (gratis)

Solución de problemas

Teléfono: 766 5029 (gratis)

ESTADO LIBRE ASOCIADO DE PUERTO RICO

GOBIERNO MUNICIPAL
APARTADO 317
GURABO, PUERTO RICO 00778

OFICINA DE RELACIONES PUBLICAS
TEL. 737-8411 EXT. 230

PEDRO J. COLON
OFICIAL DE RELACIONES PUBLICAS

2 de febrero de 1993

LISTADO DE IGLESIAS DE GURABO

Iglesia de Dios Inc.	Bo.	Navarro	Tel.	737-5768
Iglesia Pent. Movimiento Intern.	"	Navarro	"	737-7435
Iglesia Bautista	"	Hato Nuevo	"	737-6870** 6748
1ra. Iglesia de Dios Inc.	"	Celada	"	737-3446
Igl. Fuente de Salvación Misionera		Celada	"	737-3262
Iglesia Jehova Jireh M.E.	"	Celada	"	737-5003
Iglesia de Dios Pentecostal	"	Hato Nuevo	"	732-7076
Iglesia Bautista	"	Celada	"	737-5663
Iglesia de Dios Mission Board	"	Navarro	"	747-2260
Iglesia de Dios Mission Board	"	Jaguas	"	737-5025
Iglesia de Dios Pentecostal M.I.	"	Celada	"	737-7571
Iglesia de Dios Inc.	"	Celada	"	737-3310
Iglesia Mission Board		Pueblo	"	737-4513
Iglesia Cristiana Misionera	"	Mamey I	"	737-3474
Iglesia de Dios Pentecostal M.I.		Pueblo	"	737-4190
Iglesia Jovenes Cristianos	"	Pueblo	"	737-8185
Iglesia Alpha y Omega	"	Villa Alegre	"	743-7024
Igl. Jescristo Valle de Salvacion		Hato Nuevo	"	737-3133**3131
1ra. Iglesia de Dios Inc.	"	Celada	"	737-7771
Igl. Fuente de Salvación Misionera		Villa Alegre	"	744-1433**7433
Iglesia de Dios Inc.	"	Massas I.	"	737-2486
Igl. Universal de Jesucristo	"	Rincón	"	737-7839**8322
Iglesia Mission Board	"	Jaguas	"	737-6352**6332

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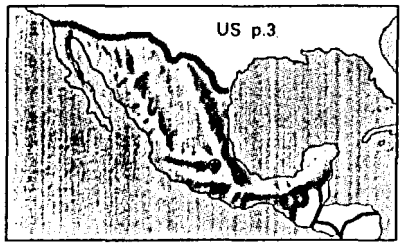

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Puerto Rico
Central America

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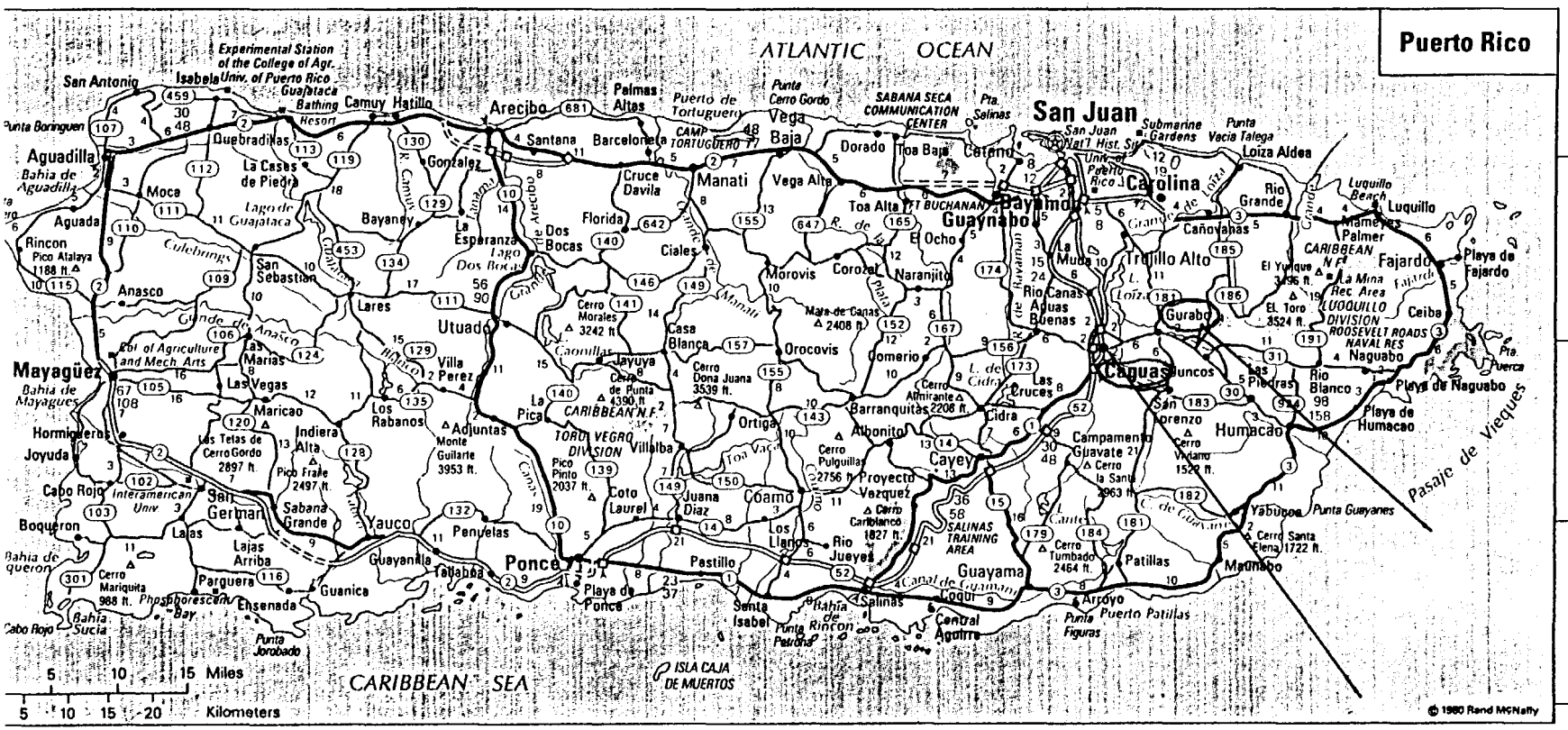
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Cayey
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Aguadilla
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Lares
Adjuntas
Jayuya
Ponce
Coamo
Juana Diaz
Villalba
Orocovis
Morovis
Ciales
Manati
Vega Baja
Vega Alta
Toa Baja
Toa Alta
Dorado
Cataño
Trujillo Alto
Gurabo
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Cidra
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Punta Tuna
Punta Guayanes
Punta Petrona
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Lago de Carite
Lago de Guayabal
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Lago de Cerrillos
Lago de Guánica
Lago de Guayanilla
Lago de Yauco
Lago de Caonillas
Lago de Garzas
Lago de Humacao
Lago de Loíza
Lago de Cidra
Lago de Patillas
Lago de Carite
Lago de Guayabal
Lago de Coamo
Lago de Cerrillos
Lago de Guánica
Lago de Guayanilla
Lago de Yauco
Lago de Caonillas
Lago de Garzas
Lago de Humacao
Lago de Loíza
Experimental Station of the College of Agr. Univ. of Puerto Rico
Submarine Gardens
San Juan Nat'l Hist. Site
Unit of Puerto Rico
SABANA SECA COMMUNICATION CENTER
CAMP TORTUGUERO
FT BUCHANAN
CARIBBEAN N.F.
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Playa de Cidra
Playa de Coamo
Playa de Juana Diaz
Playa de Villalba
Playa de Orocovis
Playa de Morovis
Playa de Ciales
Playa de Manati
Playa de Vega Baja
Playa de Vega Alta
Playa de Toa Baja
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Playa de Anasco
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Playa de Utuado
Playa de Adjuntas
Playa de Jayuya
Playa de Ponce

CERTIFICATE OF SERVICE

I, Scott Cinnamon, do hereby certify that true copies of the foregoing were delivered this 4th day of March 1993, as shown, or mailed, first-class, postage prepaid, to the following:

Michael C. Ruger, Chief
Allocations Branch
Mass Media Bureau
2025 M Street, N.W., Room 8322
Stop Code 1800 D5
Washington, D.C. 20554 *

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