

**COMMSOUTH Media ASSOCIATES**

4001 Highway 78 East Jasper, AL 35501 (205)384-4656

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June 3, 1993

Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W.- Room 222  
Washington, D.C. 20554

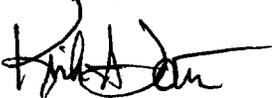
Re: Petition to Amend FM Table of Assignments 73.202(b)  
Section, Alabama  
Channel 284A

Dear Ms. Searcy:

Pursuant to Section 1.401 of the Federal Communications Commission's Rules, please find enclosed an original and four copies of the above styled Petition for Rulemaking on behalf of Deborah M. Thompson.

Please don't hesitate to call me should you have any questions or concerns about this matter.

Sincerely,



Kirk A. Tollett  
Consultant to Deborah M. Thompson

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**Prepared by:**  
**Kirk A. Tollett**  
**Commsouth Media**  
**Associates**  
**4001 Highway 78 East**  
**Jasper, AL 35501**

**Prepared for:**  
**Deborah M. Thompson**  
**Route 5, Box 881**  
**Scottsboro, AL 35768**

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**Petition For Rulemaking**

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**Section, Alabama**

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**June 3, 1993**

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202 (b) )  
Table of Assignments, )  
FM Broadcast Stations )  
Section, Alabama )

Docket No. \_\_\_\_\_  
RM \_\_\_\_\_

To: Chief, Policy and Rules Division

**PETITION FOR RULEMAKING**

Deborah M. Thompson, (hereinafter "Petitioner"), pursuant to Section 1.401 of the Commission's Rules, respectfully petitions the Commission to institute a rulemaking proceeding looking toward the assignment of FM Channel 261A to Section, Alabama, and to amend Section 73.202(b) of the Commission's Rules as follows:

City	Channel Number	
	Present	Proposed
Section, Alabama		261A

In support whereof the following is shown:

- As reflected in the attached technical exhibit, prepared by Commsouth Media Associates, the requested assignment of FM Channel 261A at Section, Alabama, can be made in full compliance with all applicable minimum mileage separations and other technical requirements under the Commission's Rules. Further, Channel 261A can be assigned to Section, Alabama without any other changes in the Table of Assignments.

2. Section, Alabama is an incorporated town located at the southern end of Jackson County. Section has its own local government with an elected Mayor and Town Council, a local Police force as well as volunteer fire department, industrial park and locally supported recreational park. Section has its own bank, Post Office, as well as Elementary and High School. 1990 U.S. Census figures for the of the Town of Section was 777 persons. The 1990 Census figures for Jackson County were 47,796.

3. It is the long standing policy of the Commission as mandated by Congress to allow the most efficient use of available spectrum in order to advance the public interest, convenience, and necessity. There is no broadcast facility currently licensed to Section, Alabama. Therefore, if adopted this proposal would provide first local service to the community of Section, Alabama.

4. As can be ascertained from the attached declaration, if Channel 261A is allocated to Section, Alabama, petitioner will promptly apply for a construction permit for the new FM broadcast station, and if a construction permit is granted, petitioner will promptly construct and operate the station for which she is licensed.

WHEREFORE, for the foregoing reasons, the Commission should amend Section 73.202(b) of its Rules by allocating FM Channel 261A to Section, Alabama.

Respectfully Submitted,



Kirk A. Tollett

Consultant to Deborah M. Thompson

Commsouth Media Associates  
4001 Highway 78 East  
Jasper, AL 35501  
(205)384-4656  
June 3, 1993

## DECLARATION

I, Deborah M. Thompson, hereby certify that:

1. That I am a citizen of the United States and of the State of Alabama.
2. I am a petitioner requesting the Federal Communications Commission institute the appropriate Rulemaking to allocate FM Radio Channel 261A (100.1 MHz) to the town of Section, Alabama.
3. I have retained Kirk A. Tollett and Commsouth Media Associates to assist me in the preparation and filing of the required technical exhibits to facilitate the aforementioned rulemaking.
4. If FM Channel 261A or an equivalent channel is allocated to Section, Alabama, I will promptly apply; either individually or as an entity of which I am a part, for a construction permit to operate the new FM broadcast station. If a construction permit is granted, I or an entity of which I am a part, will promptly construct and operate the station for which I am licensed.

I hereby certify under penalty of perjury that the above statement is true.

Signed and dated this 3rd day of June, 1993



Deborah M. Thompson  
Petitioner  
Route 5 Box 88I  
Scottsboro, Alabama 35768

## **ENGINEERING STATEMENT**

**Deborah M. Thompson**

**Section, Alabama**

**June, 1993**

### **INTRODUCTION**

This engineering exhibit has been prepared on behalf of Deborah M. Thompson, in support of a Petition for Rulemaking, requesting a change in the FM Table of Assignments, Paragraph 73.202(b) of the FCC Rules as follows:

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Location	Present	Proposed
Section, Alabama	None	261A

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As can be gleaned from the attached exhibits, Channel 261A can be added to the Federal Communications Commission Table of Assignments with out the necessity of any other changes and without the creation of any new preclusion area.

### **DISCUSSION**

Figure 1 is a full scale reproduction of a portion of a U.S.G.S. 1:250,000 map entitled "Rome, Georgia". Upon it has been superimposed a cross mark which represents the coordinates utilized in the preparation of this Report.. The geographic coordinates selected for this study were:

N 34° 34' 30"

W 85° 59' 00"

This site is located approximately .7 kilometers south-southeast of Section, Alabama.

Figure 1, details the area of Section and the pertinent arcs from all co-channel as well as adjacent channel facilities, allocated, assigned or operational within 200 miles of the proposed allocation. It is believed that there is ample clearance to locate a tower site that would place the required unobstructed city grade signal, (70 dBu), over the entire City of Section

Figure 2, is a computer generated allocation study using the Commission's specified method of distance computations, demonstrating the assignability of FM Channel 261A to Section, Alabama. The information contained in Figure 2, was utilized in preparation of the pertinent arcs contained in Figure 1.

### **CONCLUSION**

Based on this information, and the figures that are included in this Report, we believe that the proposed assignment would be in full compliance with the Federal Communications Commission's Rules, and that Channel 261A could be assigned to Section, Alabama as that communities first local broadcast service.

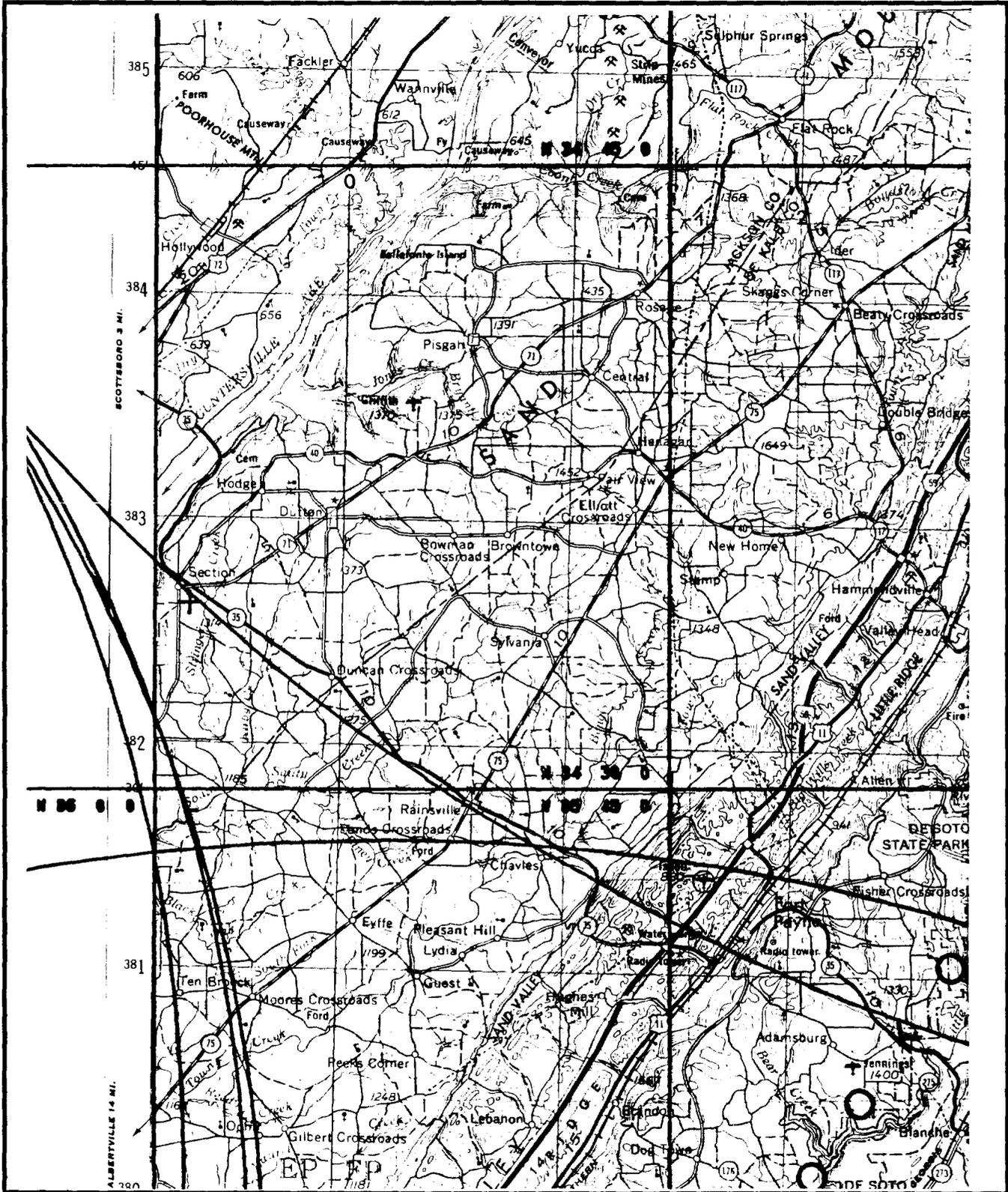
Therefore, Deborah M. Thompson, respectfully requests amendment of the Commission's Table of Assignments, Section 73.202(b), and will promptly apply for a construction permit, should the Federal Communications Commission make the requested assignment.

Respectfully,

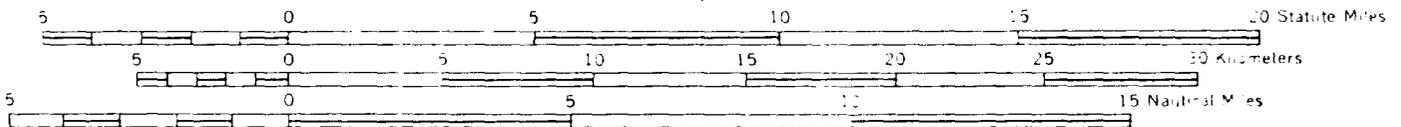


Kirk A. Tollett

June 3, 1993



Scale 1:250,000



**FIGURE 2**

PAGE 1

IDENTIFICATION OF FACILITIES FOR FM SEPARATION MAP

SECTION ALABAMA

REFERENCE POINT: N LAT 34-34-30 W LNG 85-59-00

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COMMERCIAL FM SEPARATION STUDY FOR CHANNEL 261 A  
(FREQUENCY 100.1 MHZ.)

CHAN	CALL	CITY AND STATE	CL/TYP	D(KM)	D(MI)	AZIMUTH	ERP	HAAT(M)	REQUIRED SEPARATION. KM.
258A	WYGO	MADISONVILLE TN	A CP	173.45	107.78	52.911	2.5	157	REQUIRED SEPARATION -30.5 km.
258C	WZRR	BIRMINGHAM AL	C LI	150.77	93.684	213.59	100	305	REQUIRED SEPARATION -94.5 km.
258C2	WKDP	CORBIN KY	C2 LI	320.24	198.99	33.789	25	216	REQUIRED SEPARATION -54.5 km.
259C2	WWTN	MANCHESTER TN	C2 LI	99.535	61.848	354.18	30	52	REQUIRED SEPARATION -54.5 km.
259C	WWTN	MANCHESTER TN	C CP	146.35	90.938	340.6	100	395	REQUIRED SEPARATION -94.5 km.
259C	WAPW	ATLANTA GA	C LI	171.28	106.43	120.55	100	315	REQUIRED SEPARATION -94.5 km.
260C	WKSF	ASHEVILLE NC	C LI	309.28	192.18	71.24	48	799	REQUIRED SEPARATION -164.5 km.
260C2	WJWF	ARTESIA MS	C2 AS	262	162.8	248.47	0	0	REQUIRED SEPARATION -105.5 km.
260C2	WJWF	ARTESIA MS	C2 AP	263.92	163.99	247.87	47	154	REQUIRED SEPARATION -105.5 km.
260A	WACQ	TUSKEGEE AL	A DE	237.25	147.42	175.77	2.95	142	REQUIRED SEPARATION -71.5 km.
260A	NEW-	EVA AL	A AP	74.709	46.422	247.13	6	100	REQUIRED SEPARATION -71.5 km. (CLOSE 3.209)
260A	WACQ	TALLASSEE AL	A RM	237.25	147.42	175.77	0	0	REQUIRED SEPARATION -71.5 km.
260A	WACQ	TUSKEGEE AL	A CP	237.25	147.42	175.77	2.95	142	REQUIRED SEPARATION -71.5 km.
260A	NEW-	EVA AL	A AP	74.894	46.537	245.27	6	100	REQUIRED SEPARATION -71.5 km. (CLOSE 3.394)
260A	NEW-	EVA AL	A AP	75.935	47.184	250.73	3	139	REQUIRED SEPARATION -71.5 km. (CLOSE 4.435)
260A	WSNT	SANDERSVILLE GA	A AS	343.52	213.45	120.38	0	0	REQUIRED SEPARATION -71.5 km.
260A	NEW-	UNADILLA GA	A AP	327.39	203.43	140.21	6	100	REQUIRED SEPARATION -71.5 km.
260A	NEW-	TENNILLE GA	A DE	342.4	212.76	120.01	6	100	REQUIRED SEPARATION -71.5 km.
261D	W1AO	TUSCALOOSA AL	D CP	211.47	131.4	222.38	.01	0	
261A	KDEZ	JONESBORO AR	A CP	454.72	282.55	289.63	3	70	REQUIRED SEPARATION -114.5 km.
261A		PANAMA CITY BFL	A AS	489.2	303.97	177.98	0	0	REQUIRED SEPARATION -114.5 km.
261A	NEW	PANAMA CITY BFL	A CP	486.22	302.12	178.26	3	100	REQUIRED SEPARATION -114.5 km.
261D	W1AP	AUGUSTA GA	D LI	384.37	238.84	108.18	.02	0	
261A	WACD	STATESBORO GA	A AP	456.27	283.51	119.96	3	91	REQUIRED SEPARATION -114.5 km.
261A	WLOV	WASHINGTON GA	A LI	315.24	195.88	106.44	2.4	98	REQUIRED SEPARATION -114.5 km.
261A	WFLQ	FRENCH LICK IN	A LI	449.57	279.35	353.02	3	91	REQUIRED SEPARATION -114.5 km.
261A	WMDJ	ALLEN KY	A LI	445.3	276.7	40.294	.86	150	REQUIRED SEPARATION -114.5 km.
261A	WMDJ	ALLEN KY	A CP	445.3	276.7	40.294	1.3	150	REQUIRED SEPARATION -114.5 km.
261A	WIKI	CARROLLTON KY	A LI	458.89	285.14	8.4984	3	91	REQUIRED SEPARATION -114.5 km.
261A	WQXE	ELIZABETHTOWNKY	A LI	336.17	208.89	1.83	3	91	REQUIRED SEPARATION -114.5 km.
261A	WQXE	ELIZABETHTOWNKY	A CP	351.97	218.7	1.3559	2.15	116	REQUIRED SEPARATION -114.5 km.
261A		MARTIN KY	A AS	441.96	274.62	40.115	0	0	REQUIRED SEPARATION -114.5 km.
261A	WFMI	WINCHESTER KY	A LI	412.76	256.48	21.178	1.4	140	REQUIRED SEPARATION -114.5 km.
261A	WQXB	GRENADA MS	A LI	364.92	226.75	256.98	3	91	REQUIRED SEPARATION -114.5 km.
261A		WEST COLUMBIASC	A AS	459.27	285.38	96.717	0	0	REQUIRED SEPARATION -114.5 km.
261A	WSCQ	WEST COLUMBIASC	A LI	455.58	283.08	95.721	2.95	101	REQUIRED SEPARATION -114.5 km.
261A	WASL	DYERSBURG TN	A LI	352.03	218.74	299.21	2.5	91	REQUIRED SEPARATION -114.5 km.

## SECTION ALABAMA 261 A page 2

CHAN	CALL	CITY AND STATE	CL/TYP	D(KM)	D(MI)	AZIMUTH	ERP	HAAT(M)	REQUIRED SEPARATION. KM.
261A	WWRB	FRANKLIN TN	A LI	180.07	111.89	334.45	.2	360	REQUIRED SEPARATION -114.5 km.
261A	WTZE	TAZEWELL VA	A LI	487.09	302.66	53.002	1.8	119	REQUIRED SEPARATION -114.5 km.
261A	WGSY	PHENIX CITY AL	A LI	246.01	152.86	158.29	6	100	REQUIRED SEPARATION -114.5 km.
261C2	WDXX	SELMA AL	C2 LI	255.95	159.04	202.1	50	88	REQUIRED SEPARATION -165.5 km.
261A	WJWF	ARTESIA MS	A DE	276.31	171.69	243.36	3	91	REQUIRED SEPARATION -114.5 km.
261C2	WQXB	GRENADA MS	C2 AP	387.28	240.64	256.45	22	226	REQUIRED SEPARATION -165.5 km.
261C2	WASL	DYERSBURG TN	C2 CP	360.65	224.1	299.09	26	206	REQUIRED SEPARATION -165.5 km.
261C3	WPCF	PANAMA CITYB FL	C3 CP	489.21	303.98	177.74	8	125	REQUIRED SEPARATION -141.5 km.
261A	WFXM	FORSYTH GA	A CP	267.32	166.1	132.65	2	175	REQUIRED SEPARATION -114.5 km.
261C2	WBCD	STATESBORD GA	C2 LI	456.26	283.51	119.95	50	90	REQUIRED SEPARATION -165.5 km.
262C1	WVNA	TUSCUMBIA AL	C1 LI	157.37	97.785	277.87	100	75	REQUIRED SEPARATION -132.5 km. (CLOSE 24.87)
262C1	WZZF	HOPKINSVILLE KY	C1 LI	304.5	189.21	330.51	100	183	REQUIRED SEPARATION -132.5 km.
262C	WZZF	HOPKINSVILLE KY	C AP	304.5	189.21	330.51	100	305	REQUIRED SEPARATION -164.5 km.
262C	WOKI	OAK RIDGE TN	C LI	240.37	149.36	40.853	100	610	REQUIRED SEPARATION -164.5 km.
262A		BRANTLEY AL	A AS	331.22	205.81	185.12	0	0	REQUIRED SEPARATION -71.5 km.
263D	W3AA	CONYERS. ETC. GA	D LI	189.78	117.92	116.31	0	0	
263A		MACON MS	A AS	288.5	179.27	236.41	0	0	REQUIRED SEPARATION -30.5 km.
263C2	WBLE	BATESVILLE MS	C2 LI	348.17	216.34	267.47	50	150	REQUIRED SEPARATION -54.5 km.
263C	WHMA	ANNISTON AL	C LI	105.48	65.542	175.33	100	348	REQUIRED SEPARATION -94.5 km. (CLOSE 10.98)
264A	WLXY	NORTHPORT AL	A CP	210.78	130.97	228	3	100	REQUIRED SEPARATION -30.5 km.
264A	WLRR	MILLEDGEVILLE GA	A CP	302.87	188.19	121.7	3	100	REQUIRED SEPARATION -30.5 km.
264C3	7225	MIDDLETON TN	C3 RM	268.42	166.79	283.65	0	0	REQUIRED SEPARATION -41.5 km.
264C3	7092	RAMER TN	C3 RM	249.49	155.03	283.88	0	0	REQUIRED SEPARATION -41.5 km.
264A	WXDQ	SELMER TN	A RM	256.04	159.1	287.06	0	0	REQUIRED SEPARATION -30.5 km.
264C3	WLRR	MILLEDGEVILLE GA	C3 AS	313.55	194.83	121	0	0	REQUIRED SEPARATION -41.5 km.
264C3	WLXY	NORTHPORT AL	C3 RM	217.38	135.07	228.48	0	0	REQUIRED SEPARATION -41.5 km.
264A		CUTHBERT GA	A AS	330.35	205.27	160.1	0	0	REQUIRED SEPARATION -30.5 km.
264C3		COVINGTON GA	C3 RM	234.43	145.67	122.51	0	0	REQUIRED SEPARATION -41.5 km.
264C	WUSY	CLEVELAND TN	C LI	94.768	58.886	41.933	100	363	REQUIRED SEPARATION -94.5 km. (CLOSE .268)
207C1	WLRH	HUNTSVILLE AL	C1 LI	49.247	30.601	277.01	100	247	REQUIRED SEPARATION -21.5 km. (CLOSE 27.747)
208A	NEW	BIRMINGHAM AL	A CP	143.08	88.906	212.35	0	0	REQUIRED SEPARATION -9.5 km.
208C2	WMDT	MURFREESBORD TN	C2 LI	145.34	90.31	346.88	50	64	REQUIRED SEPARATION -14.5 km.

## CERTIFICATION

Kirk A. Tollett hereby certifies that;

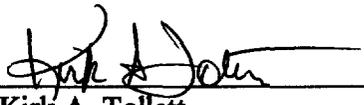
He is owner of Commsouth Media Associates, a broadcast consulting firm based in Jasper, Alabama;

His qualifications in broadcast matters are a matter of record before the Federal Communications Commission having been presented and accepted on many occasions in the past:

That he has been retained by Deborah M. Thompson for the purpose of developing technical exhibits and analyses for the instant filing;

That the accompanying technical report and exhibits were developed by him personally or under his immediate supervision and that all the information presented therein is true and correct to the best of his knowledge and belief.

Signed and dated this 3rd day of June, 1993

  
\_\_\_\_\_  
Kirk A. Tollett