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

NOV - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of Section 309(j))
of the Communications Act)
Competitive Bidding)

DOCKET FILE COPY ORIGINAL
PP Docket No. 93-253

To: The Commission

**COMMENTS
OF
THE QUICK CALL GROUP**

The Quick Call Group ("QCG"), by its counsel, in response to the *Notice of Proposed Rule Making ("NPRM")*, FCC 93-455 (released October 12, 1993), herewith submits its Comments in the above-captioned Rule Making proceeding.

I. Background

(a). The Notice of Proposed Rule Making

The NPRM seeks public comment on numerous provisions of the Omnibus Budget Reconciliation Act of 1993, which empowers the Commission to use competitive bidding to award licenses for certain uses of the radio spectrum, including Cellular Services. The Commission proposes that auctions be limited to (a) mutually exclusive applications, (b) initial license applications (and not renewal or modification applications), and (c) radio communications services that principally use their spectrum to provide service to subscribers for compensation. See, NPRM at para. 2.

According to the NPRM, under Section 309(j)(2)(B) of the Communications Act, the Commission must determine that use of a system of competitive bidding will promote the development and rapid deployment of new technologies, products, and

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services for the benefit of the public, including those residing in rural areas, without administrative or judicial delay. See, *NPRM* at para. 12. (*emphasis added*) Furthermore, in making the spectrum allocation decisions and in prescribing regulations under Section 309(j)(4)(C), the Commission is not permitted to base a finding of public interest, convenience, and necessity on the expectation of Federal revenues that would result from the use of competitive bidding. See, *NPRM* at para. 14 (*citing Section 309(j)(7)*) (*emphasis added*).

By virtue of the *NPRM*, the Commission proposes to utilize the competitive bidding process for the Cellular Services as follows:

Approximately 10,000 unserved area applications were filed between March 10 and May 12, 1993; of these, approximately 9,000 mutually exclusive applications were filed for 83 systems. Given the large number of applications filed prior to July 26, 1993 and the criteria described in Section 309(j), the Commission has the option of allowing these unserved area applications to be resolved by auction rather than by lottery We believe that auctions for these pending applications would meet the statutory objectives. For example, the rapid deployment of new service, especially to rural areas, would be accomplished because insincere applicants who do not intend to build out their proposed systems but, rather, assign their authorization for profit, would be discouraged from competing in an auction. In addition, under some of the auction procedures proposed herein, auctions would provide more opportunity for a wider variety of applicants to become cellular licensees. Thus, we propose to auction, rather than lottery, unserved area applications filed prior to July 26, 1993 and seek comment on the proposal. (*NPRM* at para 160.) (*citations and footnotes omitted*)

(b). Section 332(e) - Special Rule

Pursuant to a Conference Agreement between the U.S. House of Representatives and the U.S. Senate, a Section 332(e)

"special rule" was added to the Competitive Bidding legislation, which states in pertinent part:

The Federal Communications Commission shall not issue any license or permit pursuant to Section 309(i) of the Communications Act of 1934 (47 U.S.C. 309(i)) after the enactment of this Act unless --

(2) one or more applications for such license were accepted for filing by the Commission before July 26, 1993.

(c). The December 23, 1992 "Public Notice" for Cellular Radio Unserved Areas

On December 23, 1992, the Commission released *Public Notice Report No. CL-93-36* wherein ten filing windows were established for filing applications for Cellular Radio Unserved Areas. (See, Attachment No. 1). Public Notice Report No. CL-93-36 supplied extensive detail on the Commission's filing requirements, such as application format, filing procedures and ten lists of markets that would be subject to specific filing window deadlines.

(d). The Quick Call Group

In response to Public Notice Report No. CL-93-36, The Quick Call Group ("QCG") prepared and filed a total of 25 applications for cellular unserved areas, over the course of seven filing windows between March 10, 1993 and April 21, 1993.¹ QCG spent almost \$30,000 for the preparation and

¹ QCG filed cellular unserved applications for the following areas: Los Angeles, CA; Seattle, WA; San Francisco, CA; Kansas City KS/MO; Idaho 3; Minnesota 4; Wyoming 5; Minneapolis, MN; St. Louis, MO; Denver, CO; Phoenix, AZ; Montana 3; Tennessee 8; Salt Lake City, UT; Oklahoma City, OK; Tucson, AZ, Fresno, CA, Albuquerque, NM; Wichita, KS;

filing of its applications. These expenses included engineering and legal fees, financing fees, and FCC filing fees. These fees, which average about \$1,200 per application, are probably a reasonable average of costs spent by the more than 10,000 applicants that filed applications in response to Public Notice Report No. CL-93-36./²

II. The Commission Should Hold Lotteries For The Cellular Unserved Areas As Originally Planned

(a). As A Matter of Law Certain Cellular Unserved Applications Must Be Subject to Lotteries

As noted above, the Commission previously established ten filing windows for the filing of cellular applications for unserved areas. On July 9, 1993, the FCC released Lottery Notice No. 33832, wherein a September 22, 1993 lottery date was established to select permittees in numerous markets. The Lottery Notice included a list of applications that were "accepted for filing" in the unserved areas subject to the lottery. (See, Attachment No. 2 - lists of applications omitted)

Thus, as of July 9, 1993, all applications that would have been subject to the September 22, 1993 lottery had already been "accepted for filing." According to the Section 332(e) "Special Rule," these applications are excluded from the new competitive bidding process since they were accepted for filing prior to July 26, 1993. Thus, as a matter of law,

Bakersfield, CA; Duluth, MN; Eugene/Springfield, OR; Visalia, CA; Springfield, IL; and Billings, MT.

² If the Commission was to use QCG's costs as representative, an estimated \$12,000,000.00 was spent by applicants for cellular unserved areas in response to -- and reliance upon -- specific FCC Public Notices and associated guidelines.

all cellular unserved applications that would have been subject to the September 22, 1993 lottery must be selected as originally planned -- by the lottery process./³

**(b). Lottery Selection For All Cellular
Unserved Areas Is In The Public Interest**

According to the *NPRM*, the Commission proposes auction selection for cellular unserved areas to promote the rapid deployment of new service, and provide more opportunity for a wider variety of applicants to become cellular licensees. Simply stated, there is no logic to the Commission's reasoning.

Rapid Deployment of Service: The lottery selection process has been utilized by the Commission in the regular cellular services for many years. While no selection process is perfect, the Commission has not submitted one iota of evidence that the current selection process has been abused, or that the deployment of cellular service has been extraordinarily delayed by the lottery process. With the exception of a handful of markets where administrative errors resulted in judicial appeal of cellular license awards, the Commission has never heretofore complained that the deployment of cellular service had been delayed. Actually, the opposite is true. Cellular radio service has spread across the country at a very swift pace, creating a very reliable communications

³ Although the Commission may argue in rebuttal that the selection process should be uniform, and not split up between lottery and auction, there is recent precedent for permitting these applications to be selected by lottery, as originally planned. In the Interactive and Video Data Service ("IVDS"), the FCC recently selected a small number of permittees by lottery, and the remaining IVDS applications will be subject to auction.

service. Now, with the expectation of Federal revenues that would result from the use of competitive bidding, criticisms of the longstanding cellular selection process are being conjured up in an effort to falsely justify a change-over to the auction process.

Long ago the Commission adopted serious and effective safeguards to ensure rapid deployment of cellular services. Currently cellular permittees are required to construct their systems in compliance with strict build-out requirements, generally based upon areas and populations served. As with other FCC services, such as Nationwide 220 MHz, if a permittee does not build-out in accordance with strict FCC guidelines, the permit is rescinded by the Commission and another permittee selected. Generally, the FCC adopted such build-out and service area guidelines to discourage speculators from filing applications. These restrictions and guidelines have been most effective. There is no justifiable reason to change such processes.

With respect to the cellular unserved application process, each applicant, such as QCG, was required to demonstrate firm financial qualifications, and provide a detailed engineering and construction plan at the time of original filing. Unlike the IVDS service where only a simple FCC Form 155 was required (thus encouraging speculators to file), the cellular unserved process required substantial financial wherewithal to proceed. Therefore, the Commission cannot justifiably say that the 10,000 cellular unserved applicants are a group of speculators and/or unqualified parties unable to rapidly deploy the new service. QCG is ready, willing and able to proceed with the construct of any

cellular unserved system that may be awarded to it in the lottery selection process./⁴

III. A Change in Longstanding Cellular Procedures at This Late Stage Will Invite Judicial Challenge, Delay Rapid Deployment of Service, and Disserve the Public Interest

As QCG explains above, not only is the Commission's logic questionable with respect to the use of auctions for the selection of cellular unserved permittees, but a change in Commission policy at this late stage must be reconciled with the fact that over 10,000 applicants previously relied in good faith upon FCC Public Notices and guidelines, and expended millions of dollars as a result thereof. While the FCC filing fees may be refundable, the bulk of the costs --- millions of dollars --- are not refundable.

Legal practitioners around Washington, D.C. are already conferring about the filing of a class action lawsuit against the FCC if it adheres to its arbitrary and capricious proposals for the selection of cellular unserved areas by

⁴ QCG also questions the Commission's logic in claiming that the auction process would provide more opportunity for a wider variety of applicants to become cellular licensees. If these markets are subject to a bidding war, only the most deep-pocketed parties will be able to proceed, thus forcing out the other legitimate but less financially fortunate applicants. Although the NPRM indicates that no one would over bid for a particular service just to beat the competition, a very deep-pocketed company may very well over bid for several markets, knowing that if it secured a "network" of markets, streamlined operational costs may justify the initial outlay in the long run. Adoption of the auction process will invite collusion and other anti-competitive practices which will ultimately result in the Commission expending unforeseen resources towards enforcement and compliance. Unless the Commission is seriously committed to overseeing and regulating such destructive practices, the auction process will become a sham, causing massive licensing gridlock.

auction rather than lottery. The threat of judicial action is real anytime an administrative agency changes its rules in mid-stream to the detriment of those that previously acted in good faith in response to longstanding policy.

In *U.S. v. State Farm Mutual Automobile Insurance Co.*, 463 U.S. 29 (1983) a unanimous Supreme Court ruled that an agency decision to rescind or modify a regulation is subject to review under the "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law" standard. As part and parcel of this standard, "an agency changing its course by rescinding a rule is obligated to supply a reasoned analysis for the change." *Id.*

Normally, an agency rule would be arbitrary and capricious if the agency has relied on factors which Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise. See, *State Farm*, 463 U.S. at 43. The Commission's proposal to adopt auctions for the cellular unserved area selection process blatantly fails many of the elements of the Supreme Court's *State Farm* test. The Commission has not thoroughly justified a need to change the selection process, nor has it provided any evidence whatsoever that the present system of selection is "broken" and requires "fixing." Also, the Commission has no experience whatsoever with the auction process, and is certainly not an expert on how the auction process would enhance Commission operations. All in all, it seems as if the Commission wants to change the selection

process for cellular unserved areas simply to raise money. Such a strategy is not in the public interest, and is specifically prohibited. See, NPRM at para. 14 ("In making the spectrum allocation decisions and in prescribing regulations under Section 309(j)(4)(C), the Commission is not permitted to base a finding of public interest, convenience and necessity on the expectation of Federal revenues that would result from the use of competitive bidding. See, Section 309(j)(7).")

In *Yakima Valley Cablevision, Inc. v. FCC*, 60 RR 2d 1188 (U.S. App. D.C. 1986), the Court noted that the decision whether to make a new policy prospective or retroactive is "an important aspect of the problem" that must be considered by an agency changing a longstanding policy. "Indeed, courts have long hesitated to permit retroactive rule making and have noted its troubling nature. When parties rely on admittedly lawful regulation and plan their activities accordingly, retroactive modification or rescission of the regulation can cause great mischief. Of course, an agency must balance this mischief against the salutary effects, if any, of retroactivity. Reviewing courts, in turn, must critically examine retroactive rule making to ensure that the agency has appropriately balanced the competing considerations." *Yakima Valley Cablevision*, 60 RR 2d at 1196 (citations and footnotes omitted) (emphasis added)

With respect to replacing the previously announced lottery selection process for cellular unserved areas with the new proposed auction process, the Commission has not appropriately justified its actions, nor has it appropriately

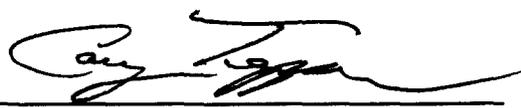
balanced the competing considerations. Its proposed actions, if adopted, would cause great mischief.

Conclusion

The Commission should stay the course with its previously announced plans to select cellular unserved permittees by the lottery selection process. If the Commission decides to replace such lotteries with auctions, thousands of parties will be damaged as a result of their good faith reliance on previously announced FCC policy and guidelines, which, in turn, will result in judicial review. If the public interest is best served by prompt deployment of new cellular service, the most prudent way to effectuate such service is to continue with the previously announced lottery selection process.

Respectfully submitted,

THE QUICK CALL GROUP

By: 

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Its Counsel

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November 1, 1993

ATTACHMENT No. 1



COPY

PUBLIC NOTICE

FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET N.W.
WASHINGTON, D.C. 20554

31066

News media information 202/632-5050. Recorded listing of releases and texts 202/632-0002.
Cellular recorded information 202/653-5858.

COMMON CARRIER PUBLIC MOBILE INFORMATION

DATES AND FILING REQUIREMENTS FOR APPLICATIONS FOR CELLULAR RADIO UNSERVED AREAS

Report No. CL-93-36

December 23, 1992

Initial cellular radio licensees are given five years to construct and expand their cellular systems. After the five-year fill-in period expires, the areas in which the initial licensees are not providing service are defined as "unserved areas." Rules have now been completed for accepting applications for the unserved areas. The Commission's cellular radio unserved area rules establish a two phase application processing procedure for all markets. In Phase I, applications may be filed during specified filing windows for any unserved area that may exist on frequency blocks within each market. In Phase II, unserved area applications will be processed on a first come, first served basis. Phase II will begin for a frequency block in a market on the 121st day after the Phase I license authorization is granted, unless no Phase I applications are received during the filing window, in which case Phase II will begin the next day.

Ten filing windows beginning March 10, 1993 and ending May 12, 1993 are designated herein for filing Phase I applications for unserved areas. Specific filing dates for markets and frequency blocks are listed on pages 5 through 14 of this notice. The list includes the frequency blocks in markets in which the fill-in period expired or will expire on or before March 15, 1993. Also included in the list is a frequency block in a market in which no applications were filed, and frequency blocks in markets where the authorizations were cancelled for failure to construct. This list does not indicate whether there is any unserved area, but merely specifies filing windows for the acceptance of applications. Applicants must determine the availability of unserved areas within the frequency blocks of specific markets by researching the Commission's station files and reviewing the cellular System Informational Updates (SIUs) filed by the licensees.

No further public notice will be made regarding future filing windows. Applicants are reminded that Section 22.924(a) of the Commission's Rules automatically establishes the filing dates for unserved area applications for frequency blocks in markets in which the fill-in period expires after March 15, 1993, as the 31st day after the system's fill-in period expires. Because of this, filing dates for some additional frequency blocks within other markets may occur within the March 10 through May 12, 1993 period specified in the lists on pages 5 through 14 of this notice.

Phase I applications for unserved areas have a one day filing window. Applications filed before this window will be dismissed as untimely filed. Applications filed after this window also will be dismissed as untimely filed, unless no applications are filed during the filing window, in which case the applications will be processed as Phase II applications.

All applications must be filed with the Commission at Pittsburgh, Pennsylvania. Applications sent via U.S. Postal Service must be addressed as follows:

**Federal Communications Commission
 Unserved Cellular - Market No. _____*
 3 Mellon Bank Center
 525 William Penn Way
 P.O. Box 358862
 Pittsburgh, PA 15251-5862**

* Note: This address should include Market No. and specify Block A or B, e.g., 123 A.

Applications shipped via courier or hand carried must be brought to the following address during the 24-hour period for that day (midnight to midnight):

**Federal Communications Commission
 Unserved Cellular Filing
 3 Mellon Bank Center
 525 William Penn Way
 Pittsburgh, PA 15259**

FORMAT OF APPLICATIONS

Phase I applications must consist of: (1) a completed transmittal sheet (FCC Form 464), a copy of which is attached hereto (see page 4 and the attachment hereto); (2) a \$230 filing fee; and (3) a sealed 5" x 7.5" envelope containing two microfiche copies of the application.

Applications must be prepared in accordance with Sections 22.6 and 22.924 of the Commission's Rules.

- * Each microfiche must be labeled at the top with the Applicant's Name, Market Number, Market Name, and Frequency Block. For example:
 Jones, Robert Market #123, Santa Rosa-Petaluma, CA Frequency Block A
- * One microfiche jacket must be labeled "Original" and the other jacket must be labeled "Copy."
- * The microfiche must be black and white (purple or blue microfiche are unacceptable because they do not produce readable paper copies), and the "original" microfiche must be of archival quality.
- * The 5" x 7.5" microfiche envelope must be clearly labeled with the Applicant's Name, Market Number, Market Name, and the Frequency Block as specified by Section 22.6(d)(3)(v).

- * The certification required under Section 22.924(c) is included on Form FCC 464, "Transmittal Sheet for Cellular Applications for Unserved Areas." Applicants are required to submit the transmittal sheet as the first page of the application (i.e., immediately inside the cover).

RECEIPT COPIES

Applicants wishing a stamped receipt copy of the transmittal sheet must provide an additional copy for each application submitted.

- * Applications that are mailed or shipped via courier must contain a self-addressed stamped envelope of sufficient size to accommodate the stamped receipt copy to be returned. The stamped receipt copy of the transmittal sheet and the self-addressed stamped envelope must be placed inside the mailing envelope but on top of the application. If the request for the stamped receipt copy is submitted in any other format, the application will be processed but the copy will not be stamped and returned.
- * When hand delivering an application, the stamped receipt copy must be attached to the outside of the 9" x 12" envelope containing the application and will be stamped and returned when presented to the acceptance clerk.

POINTS TO REMEMBER

1. Each application with associated materials (transmittal sheet, check or money order, and 5" x 7.5" microfiche envelope) must be separately packaged in a 9" x 12" outer envelope.
2. A completed transmittal sheet (FCC Form 464) is required with each application. It must be signed in ink (preferably not black ink). See Section 22.924(c)(1)(i)(E) of the Commission's Rules.
3. The microfiche must be of a signed copy of the application, be properly labeled and enclosed in a properly labeled envelope. The information (Applicant's Name, Market Number, Market Name and Frequency Block) on the top of the microfiche, on the microfiche envelope, and on the transmittal sheet must all agree.
4. The reduced map must be included in the microfiche copies of the application.
5. No extraneous material (such as transmittal letters) should be submitted.
6. The market name and number must match.
7. A single check or money order in the amount of \$230 (made payable to the Federal Communications Commission) must be included with each application. The submission of cash is strongly discouraged.
8. Postdated, third party, or dishonored checks will result in automatic dismissal of the application.
9. For applications delivered by any means other than the U.S. Postal Service, the market number and frequency block must appear in the lower left hand corner of the 9" x 12" outer envelope.

10. The 9" x 12" outer envelope may be placed inside a shipping envelope when applications are shipped by couriers which use special shipping envelopes.
11. DO NOT submit FAA Form 7460-1 to the Federal Aviation Administration at the time of filing the Phase I application. See Section 22.924(c)(4) of the Commission's Rules.
12. Applications will not be accepted under the backup filing procedures allowing unofficial copies to be filed and date stamped at the Commission's Washington, D.C. office, together with evidence of timely shipment to Pittsburgh. Applications will be considered untimely if not filed in Pittsburgh within the specified time period. Accordingly, applicants will not receive an extra day in which to file.

TRANSMITTAL SHEET

Attached is a copy of Form FCC 464, "Transmittal Sheet for Cellular Applications for Unserved Areas" which must be filed with each cellular application. You may make copies of the attached form for your use. Applicants should use the January 1992 edition of the transmittal sheet which was designed specifically for unserved area applications. Applications with previous editions of the transmittal sheet will not be acceptable for filing. The Commission will not accept computer-generated versions of the transmittal sheet. You may obtain a limited number of copies of the FCC 464 form in the Public Forms Self-Service Center, Room L-17, 1919 M Street, N.W., Washington, D.C. Additional copies of the forms may be ordered by calling 202-632-FORM or by writing to :

Federal Communications Commission
Forms Distribution Center
2803 52nd Avenue
Hyattsville, MD 20781

The following items **MUST** be completed on the transmittal sheet:

- 1(a) Name
- 1(b) Mailing Address
- 1(c) Second line of mailing address (use only if needed to show complete address)
- 1(d) City
- 1(e) State
- 1(f) Zip Code
- 1(g) Call Sign (use only if application is for an existing system)
- 1(h) Telephone Number
- 2(c) Fee Due
- 3(a) Market No. and Block (Use line 1 only for Phase I applications. Lines 2 - 4 will be applicable for Phase II applications.)
- 3(b) Market Name
- 4 Certification (The Date Signed, Typed/Printed Name, Signature, and Typed/Printed title blocks must be completed.)
- 5 Contact Representative (Complete if applicable)

For further information contact Steve Markendorff at 202-653-5560.

NOTICE

A copy of this Public Notice (excluding the transmittal sheet) shall be published in the Federal Register.

ACCEPTANCE OF APPLICATIONS FOR CELLULAR UNSERVED AREAS

MARCH 10, 1993

- | | | | |
|-------|-----------------------|-------|-----------------------------|
| 390 A | Idaho 3 - Lemhi | 485 A | Minnesota 4 - Lake |
| 525 A | Montana 3 - Phillips | 650 A | Tennessee 8 - Johnson |
| 722 A | Wyoming 5 - Converse | 733 B | American Samoa |
| 1 A | New York, NY | 1 B | New York, NY |
| 2 A | Los Angeles, CA | 2 B | Los Angeles, CA |
| 3 A | Chicago, Illinois | 3 B | Chicago, Illinois |
| 4 A | Philadelphia, PA | 4 B | Philadelphia, PA |
| 5 A | Detroit, Michigan | 5 B | Detroit, Michigan |
| 6 A | Boston, MA | 6 B | Boston, MA |
| 7 A | San Francisco, CA | 7 B | San Francisco, CA |
| 8 A | Washington, D.C. | 8 B | Washington, D.C. |
| 9 A | Dallas, Texas | 9 B | Dallas, Texas |
| 10 A | Houston, Texas | 10 B | Houston, Texas |
| 11 A | St. Louis, MO/IL | 11 B | St. Louis, MO/IL |
| 12 A | Miami, Florida | 12 B | Miami, Florida |
| 13 A | Pittsburgh, PA | 13 B | Pittsburgh, PA |
| 14 A | Baltimore, MD | 14 B | Baltimore, MD |
| 15 A | Minneapolis MN/WI | 15 B | Minneapolis, MN/WI |
| 16 A | Cleveland, Ohio | 16 B | Cleveland, Ohio |
| 17 A | Atlanta, Georgia | 17 B | Atlanta, Georgia |
| 18 A | San Diego, California | 18 B | San Diego, California |
| 19 A | Denver, Colorado | 19 B | Denver, Colorado |
| 20 A | Seattle-Everett, WA | 20 B | Seattle-Everett, Washington |
| 21 A | Milwaukee, WI | 21 B | Milwaukee, WI |
| 22 A | Tampa, Florida | 22 B | Tampa, Florida |
| 23 A | Cincinnati, Ohio | 23 B | Cincinnati, Ohio |
| 24 A | Kansas City, MO/KS | 24 B | Kansas City, MO/KS |
| 25 A | Buffalo, New York | 25 B | Buffalo, New York |
| 26 A | Phoenix, Arizona | 26 B | Phoenix, Arizona |
| 27 A | San Jose, California | 27 B | San Jose, California |

MARCH 17, 1993

28 A	Indianapolis, Indiana	28 B	Indianapolis, Indiana
29 A	New Orleans, Louisiana		
30 A	Portland, OR/WA	30 B	Portland, OR/WA
31 A	Columbus, Ohio	31 B	Columbus, Ohio
32 A	Hartford, CT	32 B	Hartford, CT
33 A	San Antonio, TX	33 B	San Antonio, TX
34 A	Rochester, NY	34 B	Rochester, NY
35 A	Sacramento, CA	35 B	Sacramento, CA
36 A	Memphis, TN/AR/MS	36 B	Memphis, TN/AR/MS
37 A	Louisville, KY/IN	37 B	Louisville, KY/IN
38 A	Providence, RI/MA	38 B	Providence, RI/MA
39 A	Salt Lake City-Ogden, UT	39 B	Salt Lake City-Ogden, UT
40 A	Dayton, Ohio	40 B	Dayton, Ohio
41 A	Birmingham, AL	41 B	Birmingham, AL
42 A	Bridgeport, CT	42 B	Bridgeport, CT
43 A	Norfolk, VA/NC	43 B	Norfolk, VA/NC
44 A	Albany, New York	44 B	Albany, New York
45 A	Oklahoma City, OK	45 B	Oklahoma City, OK
46 A	Nashville, TN	46 B	Nashville, TN
47 A	Greensboro, NC	47 B	Greensboro, NC
48 A	Toledo, OH/MI	48 B	Toledo, OH/MI
49 A	New Haven, CT	49 B	New Haven, CT
50 A	Honolulu, Hawaii	50 B	Honolulu, Hawaii
51 A	Jacksonville, FL	51 B	Jacksonville, FL
52 A	Akron, Ohio	52 B	Akron, Ohio
53 A	Syracuse, NY	53 B	Syracuse, NY
54 A	Gary, IN	54 B	Gary, IN
55 A	Worcester, MA	55 B	Worcester, MA
56 A	Northeast Pennsylvania, PA	56 B	Northeast Pennsylvania, PA
57 A	Tulsa, OK	57 B	Tulsa, OK

MARCH 24, 1993

58 A Allentown, PA/NJ
59 A Richmond, VA
60 A Orlando, FL
61 A Charlotte, NC
62 A New Brunswick, NJ
63 A Springfield, MA
64 A Grand Rapids, MI
65 A Omaha, NE/IA
66 A Youngstown, Ohio
67 A Greenville-Spartanburg, SC
68 A Flint, Michigan
69 A Wilmington, DE/NJ/MD
70 A Long Branch, NJ
71 A Raleigh-Durham, NC
72 A West Palm Beach, FL
73 A Oxnard, CA
74 A Fresno, CA
75 A Austin, TX
76 A New Bedford, MA
77 A Tucson, AZ
78 A Lansing, MI
79 A Knoxville, TN
80 A Baton Rouge, LA
81 A El Paso, TX
82 A Tacoma, WA
83 A Mobile, AL
84 A Harrisburg, PA
85 A Johnson City, TN/VA
86 A Albuquerque, NM
87 A Canton, Ohio

58 B Allentown, PA/NJ
59 B Richmond, VA
60 B Orlando, FL
61 B Charlotte, NC
62 B New Brunswick, NJ
63 B Springfield, MA
64 B Grand Rapids, MI
65 B Omaha, NE/IA
66 B Youngstown, Ohio
67 B Greenville-Spartanburg, SC
68 B Flint, Michigan
69 B Wilmington, DE/NJ/MD
70 B Long Branch, NJ
71 B Raleigh-Durham, NC
72 B West Palm Beach, FL
73 B Oxnard, CA
74 B Fresno, CA
75 B Austin, TX
76 B New Bedford, MA
77 B Tucson, AZ
78 B Lansing, MI
79 B Knoxville, TN
80 B Baton Rouge, LA
81 B El Paso, TX
82 B Tacoma, WA
83 B Mobile, AL
84 B Harrisburg, PA
85 B Johnson City, TN/VA
86 B Albuquerque, NM
87 B Canton, Ohio

MARCH 31, 1993

88 A	Chattanooga, TN/GA	88 B	Chattanooga, TN/GA
89 A	Wichita, Kansas	89 B	Wichita, Kansas
90 A	Charleston, SC	90 B	Charleston, SC
91 A	San Juan-Caguas, PR	91 B	San Juan-Caguas, PR
92 A	Little Rock, AR	92 B	Little Rock, AR
93 A	Las Vegas, NV	93 B	Las Vegas, NV
94 A	Saginaw, MI	94 B	Saginaw, MI
95 A	Columbia, SC	95 B	Columbia, SC
96 A	Fort Wayne, IN	96 B	Fort Wayne, IN
97 A	Bakersfield, CA	97 B	Bakersfield, CA
98 A	Davenport, IA/IL	98 B	Davenport, IA/IL
		99 B	York, PA
100 A	Shreveport, LA	100 B	Shreveport, LA
101 A	Beaumont, TX	101 B	Beaumont, TX
102 A	Des Moines, IA	102 B	Des Moines, IA
103 A	Peoria, IL	103 B	Peoria, IL
104 A	Newport News-Hampton, VA	104 B	Newport News-Hampton, VA
105 A	Lancaster, PA	105 B	Lancaster, PA
106 A	Jackson, MS	106 B	Jackson, MS
107 A	Stockton, CA	107 B	Stockton, CA
108 A	Augusta, GA/SC	108 B	Augusta, GA/SC
109 A	Spokane, WA	109 B	Spokane, WA
110 A	Huntington, WV/KY/OH	110 B	Huntington, WV/KY/OH
111 A	Vallejo-Fairfield-Napa, CA	111 B	Vallejo-Fairfield-Napa, CA
112 A	Corpus Christi, TX	112 B	Corpus Christi, TX
113 A	Madison, WI	113 B	Madison, WI
114 A	Lakeland, FL	114 B	Lakeland, FL
115 A	Utica-Rome, NY	115 B	Utica-Rome, NY
116 A	Lexington, KY	116 B	Lexington, KY
117 A	Colorado Springs, CO	117 B	Colorado Springs, CO

APRIL 7, 1993

119 A Evansville, IN/KY
120 A Huntsville, AL
121 A Trenton, NJ
122 A Binghamton, NY
123 A Santa Rosa-Petaluma, CA
124 A Santa Barbara, CA
125 A Appleton, WI
126 A Salinas, CA
127 A Pensacola, FL
128 A McAllen, TX
129 A South Bend-Mishawaka, IN
130 A Erie, PA
131 A Rockford, IL
132 A Kalamazoo, MI
133 A Manchester-Nashua, NH

135 A Eugene-Springfield, OR
136 A Lorain-Elyria, OH
137 A Melbourne, FL
138 A Macon-Warner Robins, GA
139 A Montgomery, AL
140 A Charleston, WV
141 A Duluth, MN-WI
142 A Modesto, CA
143 A Johnstown, PA
144 A Orange County, NY
145 A Hamilton-Middletown, OH
146 A Daytona Beach, FL
147 A Ponce, Puerto Rico
148 A Salem, OR

118 B Reading, PA
119 B Evansville, IN/KY
120 B Huntsville, AL
121 B Trenton, NJ
122 B Binghamton, NY
123 B Santa Rosa-Petaluma, CA
124 B Santa Barbara, CA
125 B Appleton, WI
126 B Salinas, CA
127 B Pensacola, FL
128 B McAllen, TX
129 B South Bend-Mishawaka, IN
130 B Erie, PA
131 B Rockford, IL
132 B Kalamazoo, MI
133 B Manchester-Nashua, NH
134 B Atlantic City, NJ
135 B Eugene-Springfield, OR
136 B Lorain-Elyria, OH
137 B Melbourne, FL
138 B Macon-Warner Robins, GA

140 B Charleston, WV
141 B Duluth, MN-WI
142 B Modesto, CA
143 B Johnstown, PA
144 B Orange County, NY
145 B Hamilton-Middletown, OH
146 B Daytona Beach, FL
147 B Ponce, Puerto Rico
148 B Salem, OR

APRIL 14, 1993

149 A	Fayetteville, NC	149 B	Fayetteville, NC
150 A	Visalia, CA	150 B	Visalia, CA
151 A	Poughkeepsie, NY	151 B	Poughkeepsie, NY
152 A	Portland, Maine		
153 A	Columbus, GA/AL	153 B	Columbus, GA/AL
154 A	New London-Norwich, CT/RI	154 B	New London-Norwich, CT/RI
155 A	Savannah, GA	155 B	Savannah, GA
156 A	Portsmouth, NH	156 B	Portsmouth, NH
157 A	Roanoke, VA	157 B	Roanoke, VA
158 A	Lima, Ohio	158 B	Lima, Ohio
159 A	Provo-Orem, Utah	159 B	Provo-Orem, Utah
160 A	Killeen-Temple, TX	160 B	Killeen-Temple, TX
161 A	Lubbock, Texas	161 B	Lubbock, Texas
162 A	Brownsville-Harlingen, TX	162 B	Brownsville-Harlingen, TX
163 A	Springfield, MO	163 B	Springfield, MO
164 A	Fort Myers, FL	164 B	Fort Myers, FL
165 A	Fort Smith, AR/OK	165 B	Fort Smith, AR/OK
166 A	Hickory, NC	166 B	Hickory, NC
167 A	Sarasota, FL	167 B	Sarasota, FL
168 A	Tallahassee, FL	168 B	Tallahassee, FL
169 A	Mayaguez, Puerto Rico	169 B	Mayaguez, Puerto Rico
170 A	Galveston, TX	170 B	Galveston, TX
171 A	Reno, Nevada	171 B	Reno, Nevada
		172 B	Lincoln, Nebraska
		173 B	Biloxi-Gulfport, MS
174 A	Lafayette, LA	174 B	Lafayette, LA
175 A	Santa Cruz, CA	175 B	Santa Cruz, CA
176 A	Springfield, IL	176 B	Springfield, IL
177 A	Battle Creek, MI	177 B	Battle Creek, MI
178 A	Wheeling, WV/OH	178 B	Wheeling, WV/OH
179 A	Topeka, Kansas	179 B	Topeka, Kansas

APRIL 21, 1993

180 A	Springfield, OH	180 B	Springfield, OH
181 A	Muskegon, Michigan	181 B	Muskegon, Michigan
182 A	Fayetteville, AK	182 B	Fayetteville, AK
184 A	Houma-Thibodaux, LA	183 B	Asheville, NC
185 A	Terre Haute, IN	184 B	Houma-Thibodaux, LA
186 A	Green Bay, WI	185 B	Terre Haute, IN
187 A	Anchorage, AK	186 B	Green Bay, WI
188 A	Amarillo, TX	187 B	Anchorage, AK
189 A	Racine, WI	188 B	Amarillo, TX
190 A	Boise City, ID	189 B	Racine, WI
191 A	Yakima, WA	190 B	Boise City, ID
192 A	Gainesville, FL	191 B	Yakima, WA
194 A	Waco, TX	192 B	Gainesville, FL
195 A	Cedar Rapids, IA	193 B	Benton Harbor, MI
196 A	Champaign, IL	194 B	Waco, TX
197 A	Lake Charles, LA	195 B	Cedar Rapids, IA
200 A	Parkersburg, OH/WV	196 B	Champaign, IL
201 A	Waterloo-Cedar Falls, IA	197 B	Lake Charles, LA
204 A	Aguadilla, Puerto Rico	198 B	St. Cloud, MN
206 A	Longview-Marshall, TX	199 B	Steubenville, OH/WV
208 A	Fort Pierce, FL	200 B	Parkersburg, OH/WV
209 A	Clarksville, TN/KY	201 B	Waterloo-Cedar Falls, IA
		202 B	Arecibo, Puerto Rico
		203 B	Lynchburg, VA
		204 B	Aguadilla, Puerto Rico
		205 B	Alexandria, LA
		206 B	Longview-Marshall, TX
		207 B	Jackson, MI
		208 B	Fort Pierce, FL
		209 B	Clarksville, TN/KY

APRIL 28, 1993

210 A Fort Collins, CO
211 A Bradenton, FL
212 A Bremerton, WA
213 A Pittsfield, MA

215 A Chico, CA
216 A Janesville, WI

218 A Wilmington, NC

220 A Abilene, TX

222 A Tuscaloosa, AL
223 A Elkhart-Goshen, IN
224 A Bangor, ME
225 A Altoona, PA
226 A Florence, AL
227 A Anderson, SC
228 A Vineland, NJ
229 A Medford, OR
230 A Decatur, IL
231 A Mansfield, OH

233 A Wichita Falls, TX
234 A Athens, GA
235 A Petersburg, VA
236 A Muncie, IN
237 A Tyler, TX
238 A Sharon, PA
239 A Joplin, MO
240 A Texarkana, TX/AR

210 B Fort Collins, CO
211 B Bradenton, FL
212 B Bremerton, WA
213 B Pittsfield, MA
214 B Richland, WA
215 B Chico, CA
216 B Janesville, WI
217 B Anderson, IN
218 B Wilmington, NC
219 B Monroe, LA
220 B Abilene, TX
221 B Fargo, ND/MN
222 B Tuscaloosa, AL
223 B Elkhart-Goshen, IN
224 B Bangor, ME
225 B Altoona, PA
226 B Florence, AL
227 B Anderson, SC
228 B Vineland, NJ
229 B Medford, OR

231 B Mansfield, OH
232 B Eau Claire, WI
233 B Wichita Falls, TX
234 B Athens, GA
235 B Petersburg, VA
236 B Muncie, IN
237 B Tyler, TX
238 B Sharon, PA
239 B Joplin, MO
240 B Texarkana, TX/AR

May 5, 1993

241 A	Pueblo, CO	241 B	Pueblo, CO
242 A	Olympia, WA	242 B	Olympia, WA
243 A	Greeley, CO	243 B	Greeley, CO
244 A	Kenosha, WI	244 B	Kenosha, WI
245 A	Ocala, FL	245 B	Ocala, FL
246 A	Dothan, AL	246 B	Dothan, AL
247 A	Lafayette, IN	247 B	Lafayette, IN
248 B	Burlington, VT	248 B	Burlington, VT
249 A	Anniston, AL	249 B	Anniston, AL
251 B	Williamsport, PA	251 B	Williamsport, PA
252 B	Pascagoula, MS	252 B	Pascagoula, MS
253 A	Sioux City, IA/NE	253 B	Sioux City, IA/NE
254 A	Redding, CA	254 B	Redding, CA
255 A	Odessa, TX	255 B	Odessa, TX
256 B	Charlottesville, VA	256 B	Charlottesville, VA
258 A	Jacksonville, NC	258 B	Jacksonville, NC
259 A	State College, PA	259 B	State College, PA
260 A	Lawton, OK	260 B	Lawton, OK
261 A	Albany, GA	261 B	Albany, GA
262 A	Danville, VA	262 B	Danville, VA
263 A	Wausau, WI	263 B	Wausau, WI
264 A	Florence, SC	264 B	Florence, SC
265 A	Fort Walton Beach, FL	265 B	Fort Walton Beach, FL
266 A	Glens Falls, NY	266 B	Glens Falls, NY
267 A	Sioux Falls, SD	267 B	Sioux Falls, SD
268 A	Billings, Montana	268 B	Billings, Montana
269 A	Cumberland, MD/WV		
270 A	Bellingham, WA	270 B	Bellingham, WA
271 B	Kokomo, IN	271 B	Kokomo, IN
272 A	Gadsden, AL	272 B	Gadsden, AL
273 A	Kankakee, IL	273 B	Kankakee, IL
274 A	Yuba City, CA	274 B	Yuba City, CA

May 12, 1993

- 275 A St. Joseph, MO
- 276 A Grand Forks, ND

- 279 A Lewiston-Auburn, ME

- 281 A Laredo, TX
- 282 A Bloomington, IN
- 283 A Panama City, FL
- 284 A Elmira, NY
- 285 A Las Cruces, NM
- 286 A Dubuque, IA
- 287 A Bryan-College Station, TX
- 288 A Rochester, MN
- 289 A Rapid City, SD
- 290 A La Crosse, WI
- 291 A Pine Bluff, AR
- 292 A Sherman-Denison, TX
- 293 A Owensboro, KY
- 294 A San Angelo, TX

- 296 A Iowa City, IA
- 297 A Great Falls, MT
- 298 A Bismarck, ND

- 300 A Victoria, TX
- 301 A Lawrence, KS

- 303 A Aurora, Elgin, IL
- 304 A Joliet, IL
- 305 A Alton-Granite City, IL
- 306 A Gulf of Mexico

- 275 B St. Joseph, MO
- 276 B Grand Forks, ND
- 277 B Sheboygan, WI
- 278 B Columbia, MO
- 279 B Lewiston-Auburn, ME
- 280 B Burlington, NC
- 281 B Laredo, TX
- 282 B Bloomington, IN
- 283 B Panama City, FL
- 284 B Elmira, NY
- 285 B Las Cruces, NM
- 286 B Dubuque, IA
- 287 B Bryan-College Station, TX
- 288 B Rochester, MN
- 289 B Rapid City, SD
- 290 B La Crosse, WI

- 292 B Sherman-Denison, TX
- 293 B Owensboro, KY
- 294 B San Angelo, TX
- 295 B Midland, TX
- 296 B Iowa City, IA
- 297 B Great Falls, MT
- 298 B Bismarck, ND
- 299 B Casper, WY
- 300 B Victoria, TX
- 301 B Lawrence, KS
- 302 B Enid, OK
- 303 B Aurora-Elgin, IL
- 304 B Joliet, IL
- 305 B Alton-Granite City, IL
- 306 B Gulf of Mexico