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March 7, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

ATTN: The Review Board

RE: Calvary Educational Broadcasting Network, Inc., MM Docket
No. 92-122, Poplar Bluff, Missouri

Dear Ms. Searcy:

Transmitted herewith on Behalf of Calvary Educational Broadcasting Network, Inc. is an original and eleven copies of its "Response of Calvary Educational Broadcasting Network, Inc." submitted in connection with the above-referenced docketed proceeding.

Should any questions arise concerning this matter, kindly contact the undersigned directly.

Respectfully submitted,

MAY & DUNNE, CHARTERED

By: Joseph E. Dunne III
Joseph E. Dunne III
Attorney for Calvary Educational Broadcasting Network, Inc.

JED:gmc:A64
enclosures

xc: All Per Attached Certificate of Service
Nina Stewart

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In Re Application of)	MM Docket No. 92-122
)	
CALVARY EDUCATIONAL BROADCASTING)	File No. BRH-891103UA
NETWORK, INC.)	
)	
For Renewal of License of)	
KOKS(FM), Poplar Bluff, Missouri)	

TO: The Review Board

RESPONSE OF CALVARY EDUCATIONAL BROADCASTING NETWORK

March 7, 1993

In Re Application of
 CALVARY EDUCATIONAL BROADCASTING
 NETWORK, INC.

For Renewal of License of
 KOKS (FM), Poplar Bluff,
 Missouri

) MM Docket no. 92-122
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: The Review Board

RESPONSE OF CALVARY EDUCATIONAL BROADCASTING NETWORK, INC.

Calvary Educational Broadcasting Network, Inc. ("Calvary") hereby submits this response to the Review Board's Memorandum Opinion and Order, FCC 94R-1 (released February 3, 1994).¹

I. Cost of Implementation and Financial Resources

1. Enclosed in Exhibit A and Exhibit B are schematic diagrams showing the sort of equipment that may be necessary to eliminate KOKS blanketing interference from effected television and radio receivers in the blanketing contour area. As we discuss at greater length below in connection with our Compliance Program, these installations were designed by Charlie Lampe, who has a great deal of experience in the area, and approved by Charles Lamb, the owner of A-1 Electronics who will be doing the work for Calvary. A consulting engineer, Kevin Fisher, has reviewed the proposed installations and believes that these installations will be adequate in almost all instances to cure KOKS blanketing interference. As noted below, this sort of complete installation

¹ The Order in paragraph 12 suggests that Calvary make two written reports, one concerning its program to comply with Section 73.318 ("Compliance Program") and one concerning the financial resources at its disposal to implement the Compliance Program. For the sake of convenience this submission addresses both issues.

should be necessary only in the most difficult instances. In most homes, a combination of filters in conjunction with preamps and/or antenna rotors should be sufficient to cure blanketing interference problems.

2. A price list showing the costs for each component in the system is included in Exhibit C. As noted, the cost per installation declines depending on the number of items purchased. If Calvary were required to install a complete system at every home in the blanketing contour which it visited in February, 1991 (105 homes) the cost of equipment would be \$30,502.50

3. The biggest technical change in the area, particularly in the blanketing contour, is the initiation of cable service. Most homes in the blanketing contour subscribe to one of two separate systems: Enstar Cable ("Enstar") and Boycom Cablevision, Inc. ("Boycom"). The service offerings of both systems is included in Exhibit D. As part of its Compliance Program Calvary will, if other technical solutions are impossible, pay for a complainant's basic cable service for one year, including installation.² Basic service on Enstar's system is \$26.36, with an installation charge of \$45 per hour. There is no monthly charge to hook up extra TV sets.

². The Mass Media Bureau has indicated that it will argue that should Calvary elect to pay for cable service, its obligation to pay should not be limited, i.e., it should pay for the cable service until the complainant dies or moves. Calvary will address that issue below.

Installation of Enstar cable service in our home, which is adjacent to the tower, cost \$55. Boycom's basic cable service is \$22 a month, and it charges \$30 for installation. Cable installation on additional televisions cost \$30 each. There is no monthly charge for extra TV installations. Accordingly, if Calvary were to elect to pay for a complainant's cable service the cost to Calvary would most likely be no more than \$316 for Enstar or \$294 for Boycom.

4. As noted below, Calvary has retained A-1 Electronics (A-1) to visit homes experiencing blanketing interference. A-1 is charging Calvary its normal rates of \$35 per home visit and \$18.50 per half hour of work. At that rate, assuming an average home visit of one hour, Calvary would be obligated to pay A-1 \$7,560 for 105 visits. A Calvary employee, noted below, will accompany A-1 representatives during their home visits. The wages for this employee will cost Calvary less than \$1,500 (assuming 105 home visits). A mail service in Poplar Bluff will be used to mail material to homes in the blanketing interference contour. The postage plus the charge for the mail service will cost less than \$200. Calvary's communications counsel will also be involved in implementing the Compliance Program, but he has agreed that Calvary's obligations to him will not compromise the implementation of the Compliance Program.

5. Accordingly, the best estimates of the Compliance Program we discuss below is as follows:

-Equipment (100 Homes)	\$30,502.50
-Cable service (20 homes)	\$5,880
-A-1 Electronics	\$7,560
-Mail Service	\$200
-Employee Wages	\$1,500

TOTAL: \$45,642.50

6. To meet the anticipated expense of the Compliance Program Calvary has obtained an additional \$50,000 loan from the Peoples Bank of Wayne County (the "Bank"). This loan commitment is attached in Exhibit E. Calvary has agreed to provide the security required by the Bank, including a second deed of trust on our home. With the exception of the funds already owed to Peoples Bank which are being refinanced as part of this loan, and sums owed our communications counsel, Calvary has no current obligations in excess of \$500. The availability of these funds ensures that Calvary can implement the Compliance Program described below and even have a cushion of approximately \$4,000 in available funds should unanticipated expenses occur.

II. Calvary's Compliance Program

A. Calvary Response to Certain Complaints

7. Calvary has admitted during the hearing that certain complainants, such as Mrs. Durbin and Mrs. Freeman, had been missed and that we would respond to those complaints.³ With respect to those efforts, Calvary would report as follows.

(a) Leatha Piper. Mrs. Leatha Piper paid A-1 Electronics for a filter and Charlie Lampe to install the filter and coaxial cable on her set to cure KOKS blanketing interference. The amount she paid for the filters and installation was \$152.86. Calvary contacted Mrs. Piper and paid that amount. We also asked if she was still experiencing any interference from KOKS. She told us that she was on the cable now, and was satisfied with her reception. We believe that Mrs. Piper's complaint has been resolved, but we will contact her with the others, as described below, to ensure that she is satisfied.

(b) Clara Freeman. Calvary contacted Mrs. Freeman concerning her interference complaint. She reported that she was now on cable and no longer experienced interference. She did say that she continued to have problems with a portable black and white set in her bedroom. I made an appointment for Mr. Lampe and I to visit. During the visit Mr. Lampe worked on her set, replaced the

³. Several people testified that Calvary did not respond to their complaints, and Calvary acknowledged the fact and promised to cure the complaint if possible. See, Calvary "Findings of Fact and Conclusions of Law," note 6.

lead wire with coaxial cable and installed a trap filter. All the TV channels were coming in clearly after Mr. Lampe finished. Mrs. Freeman seemed satisfied and signed the statement attached at Exhibit F. Mrs. Freeman repeatedly told me that she had no other problems that she wished us to resolve. We believe that Mrs. Freeman's complaint has been resolved, but we will contact her with the others, as described below, to ensure that she is satisfied.

(c) Sandra Durbin. Mrs. Durbin testified that she paid approximately \$40 for filters, etc. to eliminate KOKS blanketing interference. Calvary recently paid Mrs. Durbin that amount. Mrs. Durbin was contacted in July and August, 1993 and asked if Calvary could make a home visit to take care of her complaint. Mrs. Durbin reported that she was receiving cable service and no longer experienced interference. I asked Mrs. Durbin if she was experiencing interference on any other set, etc., and she reported that she was not. We believe that Mrs. Durbin's complaint has been resolved, but we will contact her with the others, as described below, to ensure that she is satisfied.

(d) Mrs. Joanne Gray. Mr. Lampe and I twice visited Mrs. Gray's home. Mr. Lampe installed an antenna rotor, coaxial cable and wire on Mrs. Gray's set and worked on her radio. After the second visit she seemed satisfied with both her TV and her radio, as noted in the reports she signed attached in Exhibit G. We

believe that Mrs. Gray's complaint has been resolved, but we will contact her with the others, as described below, to ensure that she is satisfied.

B. Contacting Complainants

8. Every complainant noted as being within the blanketing contour in the Commission's October, 1990 letter will be sent a letter from Calvary by regular first class mail which asks them to contact the station, in writing or by calling a station number, if they are receiving blanketing interference on their television sets or radios. We will also contact those persons noted in footnote 5 of that letter as having their complaints resolved, including: Mary Chaffin; Sandra Durbin; Mary Freeman; Mrs. William (Joanne) Gray; Kathy Kearby; Elaine Libla; Helen Mineheart; John Parker; Annie Pennington; Leatha Piper; Mary Wynn⁴; Leona Gunter; and, Sandy Hall. The letter will be prepared by communications counsel, include a copy of section 73.318 of the Commission's rules, and address the following points: (1) KOKS is required by law to cure blanketing interference to a set with a booster or preamplifier, but will cure interference to any TV set not hooked up to a booster; (2) KOKS is obligated to cure blanketing interference to

⁴. Calvary believes that Mrs. Wynn no longer lives within the blanketing contour, or even in Poplar Bluff. Mrs. Wynn testified that she paid for a filter and for the installation of a filter to cure KOKS interference. If Mrs. Wynn can be found, Calvary will pay the expenses she claimed.

radios; (3) KOKS will install the equipment necessary to cure the problem, including the installation of more than one filter; (5) any work done to cure the problem, or any equipment installed, will be done at Calvary's expense; and, (6) identify the persons who will be responding to the complaints, Mrs. Nancy Wolverton and A-1 Electronics.

9. Calvary will provide copies of the material to be mailed to the complainants to a presort mail service, Advanced Office Supplies, which will ensure that the proper material is mailed, and keep records of the letters mailed and returned. First class mail will be used rather than registered mail because many people complained when Calvary used registered mail because they disliked the necessity of coming to the post office to pick up the letter if they are not home. Complianants will be asked to write or call the station to describe their problems and arrange a home visit. A special number will be installed at the station for complainants to call, and this number will be noted in the letter sent to complainants.

10. Once the notices are mailed, Calvary will schedule home visits as soon as practically possible with those who call or write concerning interference complaints. Regardless of whether an additional complaint is called or mailed in, those complainants who expressed dissatisfaction with Calvary's last efforts in the March,

1991 filing at the Commission will be contacted by phone to see if they wish a follow-up visit.

C. Compliance Program

11. Calvary's experience from its contacts with complainants since the hearing, and our own experience, indicates that most of the people in the blanketing contour area, since they have always had the poorest television service, have subscribed to one of the cable systems which recently began operating in the area. Subscription to a cable system seems to cure the blanketing problem, See ¶ 7 (b) and (c) above concerning Mrs. Freeman and Mrs. Durbin. KOKS does not cause interference to at least one of the cable systems. See Exhibit H. Calvary has not received any complaints from subscribers of either cable system concerning blanketing or any other kind of interference, and believes that it does not provide interference, but it was not able to get any written acknowledgement from Boycom cable system of that fact within the time constraints imposed by the Review Board. Complainants who are now cable subscribers, like Mrs. Freeman, will be informed that Calvary will cure interference to other TV sets not hooked up to cable, and to radios.

12. For homes which are not hooked up to cable which complain of blanketing interference, Calvary will install on the complainants' TV set or in his/her home any or all of the equipment

noted in Exhibit A as necessary to cure the blanketing interference. The use of an antenna preamp, with a power supply, was designed into the system to cure the problem Mr. Ramage referred to in his testimony, where the installation of a filter degraded an already weak signal. The use of a preamp should cure this problem by amplifying the signal after the filter removes the offending interference. KOKS' consulting engineer has reviewed the proposed installation, and believes that the equipment, if properly installed, will cure blanketing interference in all but the most critical and persistent instances. See Exhibit I. If necessary to test an installation, Calvary will shut off its transmitter for short periods to allow testing.

13. For those few cases where blanketing interference cannot be cured by filters, coaxial cable or any of the equipment shown in Exhibit A, or in any case, at its option, Calvary will cure that interference by paying the complainant for a year's subscription to the basic tier of cable service, plus any installation charges.

14. The Mass Media Bureau has conveyed to our communications counsel that if we agree to pay for cable service to resolve a complaint we shouldn't be limited concerning the length of time that we are obligated to pay. Under this theory Calvary would have an open-ended commitment to pay for a person's cable service until they died or moved. We believe that such a requirement would be

unfair and unreasonable, as well as counter-productive. The requirement is unfair and unreasonable not only because of the immense cost that Calvary would be required to assume for a lengthy period of time, but also because Calvary would be required to pay for substantially more service than anyone in the blanketing area ever received. Any one who lives in Poplar Bluff understands that our TV reception has always been poor. All the FCC inspectors agreed on that. Our experience has been that cable service provides a much clearer, cleaner and more consistent picture than we ever experienced before. As I understand our obligation, we are supposed to restore service at our expense, not improve it.

15. The basic cable service also provides many, many more channels and services than were available off-the-air in the blanketing contour area. Most people received channels 6, 8, 12 and 15 off-air. Some received channels 23 and 39. Boycom provides 32 channels of service, including Disney, ESPN, Trinity Broadcasting Network, and the Science Fiction Channel. Enstar provides 27 channels with a similar choice. Once again, Calvary would be paying for roughly seven times more service than it is required to restore.⁵

⁵. Payment of one year's full cable service, including installation, roughly equals the cost of providing only the off-air broadcast channels, roughly one-seventh of the available channels, for eight years.

16. Although our home visits showed that blanketing interference to radios was not an issue that many complainants raised, Exhibit B shows an installation designed by Mr. Lampe that will cure any blanketing interference to radios. As noted in ¶ 7 (d) above, a similar installation resolved Mrs. Gray's problems with her radio.

D. Compliance Program Schedule

17. Implementing the Compliance Program will take at least 120 days, and that will be rushing it. Our experience has shown us that most people do not respond immediately to a letter, and we may be receiving letters or phone calls for 30 days or more after the mailing. Follow-up phone calls to those who were previously unsatisfied with Calvary's home visits will also be time-consuming. These follow-up calls almost always need to be made during the evening hours because people are at work during the day. We have also discovered that it often takes three or four phone calls to connect with complainants, and, in many instances, we are unable, for one reason or another, to arrange a home visit during the first call. We anticipate that it will take 30 to 45 days to schedule visits to complainants' homes. An additional 90 days will be necessary to visit the homes of the complainants.

18. With respect to the home visits, we have found that scheduling home visits is a chancy business because we must

schedule visits so far in advance. Home visits are also difficult to fit into people's lives because they wish us to come during the evening hours when they are home from work, but we need some daylight to do some of the work required, such as the inspection of the antenna system, or work that requires the technician to get up on a roof. Complainants, when they talk to us, often forget that they have made other plans for a particular date, or don't consult with their husband or wife who remember that they had other plans for that evening. People often forget the time of the appointment, or even that the appointment was made. All these factors indicate that the Compliance Program will take at least 120 days.

E. Compliance Program Personnel

19. Calvary has retained A-1 Electronics in Poplar Bluff to do any technical work necessary in curing blanketing interference to complainants' sets. Mr. Larry Cash, who is the owner of A-1 Electronics, has been in business in Poplar Bluff for 30 years. In hiring A-1 Electronics Calvary doesn't mean to say that Mr. Lampe isn't capable of doing the work. Mr. Lampe is, however, Calvary's contract engineer and testified for us at the hearing. We thought that using a technician who was thought of as a "neutral" might lower the level of suspicion and promote cooperation among the complainants.

20. Mrs. Nancy Wolverton, who is now a part-time DJ at KOKS, will be the person at the station responsible for responding to the written and called in blanketing complaints, scheduling home visits and accompanying the A-1 Electronics' technicians visits to complainants' homes. When a home visit is scheduled, Mrs. Wolverton will prepare a file for each complainant she will visit, and include in the file any previous complaints from that person that we can locate. Mrs. Wolverton will bring the file with her on the home visit and discuss the substance of the previous complaints with the complainant. Mrs. Wolverton has lived in the Poplar Bluff area for 32 years, and lives within the blanketing contour. She is the wife of the pastor of New Day Ministries, a church in Poplar Bluff. Mr. Stewart and I do not attend that church. Mrs. Wolverton is well-liked and a pastor's wife. She is good with people and experienced in dealing with a wide range of personalities. It will be her responsibility, with the advice of the technician, to determine what needs to be done at each home to cure the interference complained of.

F. Compliance Program Verification

21. Mrs. Wolverton will ensure that the complaints are satisfied and (hopefully) execute written statements stating that their complaints are satisfied. Given the complaints that we had heard of that filters "failed" after they were installed, Mrs.

Wolverton will call each complainant two weeks after the home visit to ensure that the complainant has had no further problems to report. We anticipate that some complainants will not agree to sign anything presented to them by Calvary for submission to the FCC. If a person refuses to sign something at their home, Mrs. Wolverton will contact that complainant two weeks later, as noted above, and try to convince them to sign a statement verifying that the complaint has been resolved. If they still refuse to cooperate, Calvary will send them a draft of what Calvary intends to submit to the FCC, and ask them to send to Calvary whatever comments they wish to make about the draft report. If Mrs. Wolverton agrees with their comments the report will be revised accordingly, or Mrs. Wolverton will see if the problem raised cannot be resolved. If not, the complainant will be assured that his/her comments will be submitted to the FCC along with Calvary's report.

G. Compliance Program Chance of Success

22. Since Calvary will not have an opportunity to respond to the Mass Media Bureau's comments, we would like to respond, if we can, to some concerns which the Mass Media Bureau will likely raise. The first is why should the Commission, aside from the issues raised concerning our honesty, trust Calvary to carry out a successful compliance program? Our answer has a number of points.

Since the station went on the air, the station's financial resources have been very limited, we have never had much cash on hand to deal with these problems. We were always looking at a bare cupboard and hoping that contributions would come in to cover expenses. That is not the case now. We have access to sufficient financial resources at the start of a project to finish it. We'll still need to raise the funds to pay off the loan, but we have enough money to do the job.

23. In addition, Calvary is a non-profit organization. It depends on the contributions of its supporters for its income. Since we began operating the station we have always remembered that, and we have tried to be good stewards of the donations entrusted to us. We have tried to be good stewards by not spending the donations sent to us if we didn't have to. This proceeding has shown us that, in this instance, being a good steward means satisfying the complaint if the costs are not outlandish. Good stewardship means doing whatever is necessary to keep the station's license.

24. When we started trying to comply with the blanketing rule Mr. Stewart and I were ignorant of the technical issues involved in blanketing interference, and how difficult it would be to resolve them. Unfortunately, we have had an expensive education on the issue, and have learned enough about the issue to leave it to the

experts. We also struggled in our earlier attempts to comply with the rules because of the uncertainty over what the blanketing rule required us to do. The Hearing Designation Order, the hearing, the Judge's decision, have made quite clear what is expected of us. We now have some authoritative guidance concerning what we need to do.

25. We have a much greater chance of success for another reason--we are going to hire some fresh faces to implement the Compliance Program. It is clear that over the years that personalities have gotten involved to the point where almost anything we do would be viewed with suspicion. We hope that by bringing in new, but competent people, to deal with the complaints that we will be able to begin to heal some wounds in this community.

26. We are also more likely to be successful because so much clearly depends on the success of our efforts. Not only is the station's license at stake, but, since our home is security for the bank loan, we also could lose our home.

27. Finally, Calvary is much more likely to succeed in its compliance program because of a new technical factor that has recently been introduced to the area. The testimony at the hearing agreed that the TV reception in the area was terrible, making the task of curing blanketing interference extremely difficult. Recently two different cable systems have been introduced to the

Poplar Bluff area and in the blanketing contour. Because of the improved reception and for other reasons people in the blanketing contour are subscribing to cable. Televisions which are hooked up to cable are not subject to KOKS blanketing interference. Since the cable has reduced the area residents' need to try to tune in distant and weak TV signals the significance of KOKS' blanketing interference has substantially dropped.

28. We also believe that even if the Mass Media Bureau agrees that our Compliance Program is adequate, it will probably also question why Calvary didn't adopt such a program sooner. The answers to that question are numerous. The first is obvious and is noted above--Calvary has been chronically starved for funds. That has changed now. The second is also obvious, we were inexperienced and made mistakes, like trying to save money and do the work ourselves. We have learned better. The third is that, as even the FCC inspectors noted, we have been trying to deal with an issue of extraordinary technical difficulty, given the distance of the desired television stations and the weakness of their signals. Some experimentation and failure would have been inevitable under even the best of circumstances. Calvary did not have the best of circumstances.

29. Another reason our compliance program wasn't successful earlier is pretty obvious. To resolve complaints some cooperation

from the complainants is essential, and, for one reason or another, we faced the active and organized hostility of many of the complainants. Some of the hostility predated the beginning of station broadcast and had nothing to do with interference, and Calvary was slow to understand, because we weren't broadcasters and relied on the professional people we hired, exactly what our responsibilities were with respect to the blanketing interference. We, at first, though the problem had to do with a poorly performing antenna, and thought the problem would be cleared up with a new antenna. Our relationship with our neighbors started out poorly and got worse. We are hoping that the passage of time and the new faces that will be representing Calvary give us a second chance to resolve these complaints.

30. In addition, Calvary didn't resolve the blanketing problems earlier for a simple reason, it did not know, nor would the Commission give it any guidance, or only belated guidance, with respect to many of the technical issues that this blanketing interference raised, i.e., interference to baby monitors, electronic instruments, satellite systems. The most important unresolved technical issue--Calvary's responsibility for curing interference to channel 6--was clearly the crux of many complaints. The Commission, however, didn't give Calvary any guidance concerning the issue until the Hearing Designation Order was

released. Calvary did not do certain things because it did not know that it was obligated to do them. That situation has changed. The Hearing Designation Order, the hearing, findings of fact, etc., all have educated Calvary, at a great cost, as to what its obligations are concerning blanketing interference.

31. Finally, the Mass Media Bureau may suggest that Calvary cannot be trusted to implement a Compliance Program because it has not done anything to attempt to comply with the blanketing rule since the publication of the Hearing Designation Order. That charge would be the most unfair of all.

32. The record is replete with references to Calvary's limited financial and personnel resources. That should not surprise the Commission, the limited financial resources of noncommercial licensees is well known. The Commission is also well aware, based on the hearing record, that complying with the blanketing rule in this instance is an expensive and time consuming process. The Compliance Program noted above is proof of the expense involved. It is a fact, however, that renewal hearings, at which the station's license is at stake, is also a time consuming and expensive process. If Calvary did not wish to be defenseless, it needed a counsel to defend it, at a considerable cost. The amount of time devoted by Calvary's principals in preparing for a hearing on the three issues designated was also considerable.

Calvary, when the its application was designated for hearing, was faced with the choice of either defending its license against charges that it misrepresented facts to the Commission, as well as didn't comply with the blanketing rule, or trying to comply with the blanketing rule. It did not have the financial or personnel resources to do both. At best it would have been condemned to the worst of all possible worlds--a weak defense and a marginal and ineffective compliance program. Calvary should not be condemned for not doing what it clearly did not have the resources or capacity to do.

33. Such a suggestion is particularly unfair because, as noted above, a Compliance Program is dependent, in large measure, on the cooperation of the complainants. To argue that Calvary should have instituted a compliance program after the case was designated for hearing overlooks the obvious. Commission counsel saw the competing crowds in the courtroom on the first day of hearing, the activity of main organizers of the opposition to Calvary's renewal, and the desire of a local TV station to broadcast the hearing live. The Commission counsel was involved in the preparation of testimony from complainant witnesses hostile to Calvary. Does the Commission really believe that Calvary had a realistic chance of obtaining the cooperation of the complainants with a hearing looming in that atmosphere? Calvary didn't think

so, and does not believe that any fair thinking individual will doubt the sincerity of its evaluation.

H. Plan Flexibility

34. In preparing this response, Calvary has tried to satisfy the concerns of the Commission of which it was aware, as well as the concerns which the Mass Media Bureau counsel have expressed. Calvary wants to comply with the Commission rules and put this controversy behind it. We want to emphasize that this is our best effort at coming up with a Compliance Plan, but we want to satisfy the complainants and the FCC so that this controversy is put to rest. We welcome the suggestions of the Mass Media Bureau concerning the Compliance Plan, and will modify the plan, if feasible and reasonable, to satisfy their concerns.

Respectfully submitted,

**CALVARY EDUCATIONAL BROADCASTING
NETWORK, INC.**

By: Nina Stewart
Nina Stewart, Secretary-
Treasurer

CALVARY EDUCATIONAL BROADCASTING NETWORK, INC.

EXHIBIT A
TV INSTALLATION