

Broadcasting Co., 93 FCC2d 482, 508 (1983)(while an applicant may intend to use "comparable used equipment, it is not sufficient simply to allege that comparable equipment is available"). It is equally well established that, in establishing the availability of used equipment, an applicant may not rely on the allegation that particular items of equipment are available on the used market at market prices, which is precisely what Bryan has attempted to do here. Wayne County Broadcasting Corp., 26 FCC2d 52, 55-56 (1970)(issues added where applicant based cost estimates on "good used equipment on the market"). While Bryan attempts to distinguish these and other cases cited in SBH's Petition (at para. 16) on the facts, his efforts are do not serve to obviate the well established principle, limiting reliance upon used equipment.

33. Bryan contends that the limitations which the Commission places on the ability of applicants to rely on used equipment are illogical, because they would require a supplier to hold used equipment for years, until a construction permit were awarded. Yet, this is precisely what would be required and precisely the reason few applicants estimate their costs of construction, based on used equipment, inasmuch as there are few instances where an applicant could adequately demonstrate the availability of used equipment, unless he owned it. However, there is nothing illogical in this, as Bryan suggests. On the contrary, it would be illogical and irresponsible for the Commission to permit applicants to rely on used equipment, absent a compelling showing

of continuing availability. While the Commission recognizes that stations can be constructed for significantly less expense utilizing used equipment, unless such equipment is on hand or is being held for the applicant's future use, there is no assurance that it will be available when the time comes to construct. Thus, an applicant who estimated his costs on the basis of prices for used equipment, which later proved to be unavailable, may well find himself undercapitalized and unable to construct. Accordingly, absent the ability to demonstrate that the specific item of used equipment at issue will continue to be available, an applicant may not properly rely on its lower cost, but must instead base his cost estimates on new equipment. 11/

34. Bryan also erroneously contends (at para. 18) that significant understatement or even omission of equipment and initial operating costs can neither fatal to his proposal nor warrant the addition of the requested financial issue. Not surprisingly, Bryan cites no precedent for this novel proposition. Not only is his position entirely unsupported, but it is contrary to the cases cited in SBH's Petition (at para. 18) which Bryan fails to distinguish. Thus, Bryan's contention that the fact patterns reflected in cases cited by SBH are not

11. Bryan's reliance upon Kittyhawk Broadcasting Corp., 20 FCC2d 1011, 1021 (RB 1969) is misplaced. The applicant in that case did not have all necessary equipment on hand. The Board indicated that this was not required, so long as the items in question could be acquired, commenting that they did not appear to be "so esoteric as to be unavailable." There was no indication that the applicant had relied on any used equipment that it did not already have on hand.

specifically analogous to those presented by his own derelictions is insufficient to distinguish them for the purpose for which they were cited, i.e., the proposition that a financial issue is warranted where an applicant fails reliably determine his cost estimates, whether due to serious understatement or due to omission, inasmuch as it precludes a determination of sufficiency of funds. Bryan's reliance upon Kaye-Smith Enterprises, 98 FCC2d 675, 677 (RB 1984) is misplaced. In that case the Board refused to enlarge issues based upon objections to an opponent's cost estimates first raised in objections and the challenged costs were not sufficiently beyond the "range of reasonableness" to suggest that the applicant "could not operate the station as proposed." Here, precisely the opposite is true and SBH's objections have been raised in a timely and properly supported petition to enlarge.

35. In opposing SBH's Petition, Bryan places undue reliance upon case precedent involving pre-June, 1989 financial certifications. Inasmuch as Bryan filed his application on the June, 1989 version of FCC Form 310, he is required not only to meet the standards set forth in Scioto Broadcasters, 5 FCC Rcd. 5158 (RB 1990) and similar cases cited by Bryan, but the Commission's revised financial qualifications standards, as well, including the specific documentation requirements set forth in the revised instructions to FCC Form 301. As a post-June, 1989 applicant, Bryan's financial certification must be supported by contemporaneous documentation, sufficient to meet the

Commission's revised financial standards. This, SBH has demonstrated, Bryan failed to do. Furthermore, Bryan has not even met the pre-June, 1989 financial standards, having significantly underestimated his equipment costs and omitted certain initial operating costs, which in light of the ephemeral chimerical nature of his alleged surplus of funds, renders him financially unqualified, regardless of whether he has met the Commission's requirements for establishing the availability of his proposed loan.

36. Bryan contends that SBH has not met its burden of establishing a prima facie case, inasmuch as it has not shown that Bryan did not engage in "serious and reasonable efforts to ascertain" his costs, which Bryan erroneously contends is all that is required. However, contrary to Bryan's position, to the extent that the results of his "efforts" were unreliable and understated cost estimates, the negative impact of these deficiencies on his financial qualifications is not alleviated, simply because he made a serious effort. Nor do the cases cited by Bryan (at para. 19-20) so hold. Furthermore, as discussed above, it is manifestly not reasonable for an applicant to attempt to determine the costs of constructing a station until after it has developed no determinative technical proposal, so it knows what it is that it proposes to construct. This Bryan failed to do. ¹²/ Similarly, as also demonstrated above, it is

12. Bryan's contention (at para. 8) that it is "normal procedure" not to determine what type of transmission system to

manifestly unreasonable to rely on the costs of used equipment, absent a legitimate expectation of the continued availability of that equipment. Yet, this is precisely what Bryan did.

VII. Summary.

37. Even without considering his understated operating costs and the understated costs for an undetermined transmitter, SBH has demonstrated that Bryan understated his costs of construction and initial operation by some \$ 30,000.00, hardly a matter of mere "nitpicking," as Bryan contends. When the \$ 1,000.00 to \$ 33,000.00 understatement of the cost of a transmitter is added, it is clear that Bryan's estimates were not reasonably ascertained. Indeed, given the absence of any definitive technical proposal, they were doomed from the start. The reasonableness of Bryan's cost estimates were also undermined by his reliance on prices for used equipment without any legitimate expectation of the continued availability of that equipment.

38. Equally flawed was Bryan's efforts to demonstrate the availability of a proposed bank loan. Having failed to meet the Commission's documentation requirements and having an inadequate basis for knowing whether or not he could comply with the terms and conditions of the loan, it was improper for him to rely upon

(Note 12, Con't.)...to utilize until after a construction permit is issued is ludicrous, inasmuch as no reliable cost estimates for equipment can be determined until it is determined what equipment is needed. While an permittee may decide to substitute other equipment (including used equipment) when the time comes to construct, this does not obviate the necessity for arriving at a definitive technical proposal at the outset, in order to determine reasonable costs.

it. ¹³/ Furthermore, even if he could rely on the bank loan, its proceeds would be precisely equal to his estimated costs, which have been shown to be understated. Thus, to the extent that his costs were understated to any degree, his costs exceeded his available funds, rendering him unqualified.

39. Bryan has either obstructed discovery by failing to produce documents he was required to produce or he lacked candor in testifying to the existence of documents which do not in fact exist. Appropriate issues should be added.

40. Section 309(e) of the Communications Act requires a full evidentiary hearing where there exists a substantial and material question of fact regarding the basic qualifications of an applicant. Weyburn Broadcasting Ltd. Partnership v. FCC, 984 F2d. 1220, 1227 (D.C. Cir. 1993); David Ortiz Radio Corporation v. FCC, 941 F2d. 1253, 1257 (D.C. Cir. 1991). Numerous substantial and material questions have been raised concerning Bryan's qualifications and, accordingly, appropriate issues should be added. The burdens of proof and proceeding should be placed on Bryan.

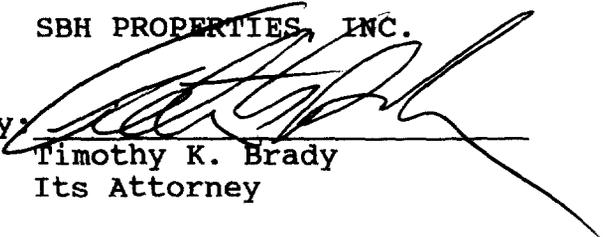
WHEREFORE, premises considered, SBH's Second Petition to Enlarge Issues against Darrell Bryan should be GRANTED and the

13. While Bryan contends (at para. 10) that this argument contains a "subtle fallacy" that that bank would not make the loan without stock pledge the issue is not what the bank's intentions were, but whether Bryan knew enough about the terms of the loan to be in a position to determine whether he could meet them, which is a prerequisite to a proper financial certification. Clearly he did not.

issues ENLARGED as requested.

Respectfully Submitted

SBH PROPERTIES, INC.

By: 
Timothy K. Brady
Its Attorney

P.O. Box 986
Brentwood, TN 37027-0986
(615) 371-9367

March 31, 1994

EXHIBIT A

DECLARATION

I, William H. Seaver, do hereby certify that:

I have reviewed the Opposition to Second Petition to Enlarge, filed by Darrell Bryan, and Bryan's Declaration and accompanying attachments.

Bryan attempts to support his unreasonably low estimate for tower by relying on a "quote" from "American Aviation, Inc.", signed by its President, Walter J. Stone. There is no phone listing for American Aviation, Inc. in Greeneville, Tennessee. The address and phone number given for American Aviation, Inc. are those for Walter J. Stone's residence. Mr. Stone is the same person who provides contract engineering services for Bryan's AM station.

I spoke with Jeff Howell, Manager of the maintenance facility of the Greeneville Municipal Airport concerning Mr. Stone. Mr. Howell indicated that he has known Mr. Stone for many years, that he was formerly a fixed base operator at the Greeneville airport and that he is currently engaged in installing and maintaining aviation navigation and lighting systems. Mr. Howell indicated that Mr. Stone maintains the lighting system for the Greeneville airport and he believes that Stone provides similar services for other airports. However, Mr. Howell indicated that he was not aware of Mr. Stone ever having

been involved in the construction or installation of a radio tower.

I also spoke with Ray Elliot, Chief Engineer for WGRV(AM) and WIKQ(FM), Greeneville, Tennessee, concerning Mr. Stone. Mr. Elliot has resided in the Greeneville area for over 30 years and indicated that he knew Mr. Stone. While he was aware that Mr. Stone had done some work for Mr. Bryan's AM station, he indicated that to the best of his knowledge Mr. Stone had never been involved in the construction or installation of radio towers.

I also spoke with Wayne Harris, General Manager of WNPC-AM/FM, in nearby Newport, Tennessee, concerning Mr. Stone. Mr. Harris indicated that he knew Mr. Stone and knew he was in the aviation navigation and lighting business and that he had done some radio work, but that to the best of his knowledge Mr. Stone had never been involved in the construction or installation of radio towers. I also spoke with Trevor Sworyer, Chief Engineer for WETS(FM), Johnson City, Tennessee, who also does contract engineering for stations in the East Tennessee area, and Roger Bouldin, Chief Engineer for WUSJ(FM), Elizabethton, Tennessee. Despite their knowledge and familiarity with persons active in the engineering aspects of broadcasting in East Tennessee, neither had ever heard of Mr. Stone.

I had previously obtained quotes for the purchase and installation of a 300 foot guyed tower from two established, recognized suppliers: Continental Electronics (\$ 26,996.00) and

RF Specialties of Florida, Inc. (\$ 37,500.00). Following receipt of Bryan's Opposition, I spoke with Bill Hoisington of RF Specialties who advised me that the tower "quote" Bryan obtained from American Aviation, Inc. was unrealistically low and must be for a used, not a new, tower.

As reflected in the attached equipment quote from RF Specialties, 300 feet of 1-5/8 inch Cablewave transmission line would cost \$ 4,866.00, calculated at \$ 16.22 per foot. The cost of connectors for 1-5/8 inch transmission line would be an additional \$ 560.00. This does not include the cost of the mounting and grounding hardware, which would cost an additional \$ 597.50. The quote Bryan obtained for connectors was apparently based upon the mistaken assumption by Hall Electronics that 7/8 inch transmission line would be used and Bryan omitted the costs of mounting and grounding hardware. Also, 200 feet of 1/2 inch Cablewave transmission line for the proposed STL system would cost \$ 500.00, calculated at \$ 2.50 per foot and mounting and grounding hardware would cost an additional \$ 346.80.

I was advised by Bill Hoisington of RF Specialties that there must be some error in the Hall Electronics quote of \$ 600.00 for two new Scala Parareflector antennas, as such a price would be below cost. RF Specialties provided me with a quote of \$ 630.00, each, for new Scala parareflector antennas.

I hereby certify under penalty of perjury that the above

statement is true.

Signed and dated this 29th day of March, 1994.

William H. Seaver
WILLIAM H. SEAVER



RF Specialties®

OF FLORIDA, INC.
P.O. Box 397, Niceville, FL 32588-0397
(904) 678-8943
FAX (904) 728-2744 • 1-800-476-8943

proposal

QUOTE NUMBER: 172-00	PROPOSAL NUMBER: 1	PROPOSAL DATE: 03/30/94
-------------------------	-----------------------	----------------------------

ALL PRICES ARE NET. ARE F.O.B. MANUFACTURER'S SHIPPING POINT(S), UNLESS SPECIFIED OTHERWISE

BILL TO: 425 MR. TIM BRADY FAX 615-371-9368	SHIP TO:
---	---

QUOTE DATE:	Terms of Sale:	Ship Date:	Ship Via:
F.O.B. 03/30/94	<input type="checkbox"/> Destination <input checked="" type="checkbox"/> CASH WITH ORDER	03/31/94	SURFACE

This quote is good for 30 days unless otherwise stated.

ITEM	QUAN:	PRODUCT:	UNIT PRICE:	TOTAL:
----- H E R E I S A R E V I S E D C O P Y -----				
1.	300	CABLEWAVE HCC 158-50 J 1 5/8 INCH AIR LINE	16.22	4,866.00
2.	1	CABLEWAVE 738314 GAS PASS CONNECTOR		260.00
3.	1	CABLEWAVE 738303 GAS BARRIER CONNECTOR		300.00
4.	1	CABLEWAVE 910311 HOIST GRIP		51.00
5.	7	CABLEWAVE 920159-003 HANGER KITS 10 PER BAG	41.00	287.00
6.	7	CABLEWAVE 514542-003 ROUND MEMBER ADPT. KITS 10 PER BAG	28.50	199.50
7.	2	CABLEWAVE 713786-008 GROUND KITS	30.00	60.00
8.	2	SCALA PR-450CU STL ANTENNAS..	630.00	1,260.00

This proposal consisting of page numbers 1 to _____ inclusive, is hereby accepted this _____ day of _____ 19____.

(Purchaser's name, corporation or partnership)

(Signature and title of seller's authorized agent)

(Signature of owner, partner or officer state which)

(Date)

THE PROVISIONS OF THE REVERSE SIDE HEREOF ARE A PART OF THIS ORDER, AND UPON ACCEPTANCE OF THIS ORDER BY BOTH PARTIES SHALL BE BINDING UPON SELLER AND PURCHASER.



RF Specialties®

OF FLORIDA, INC.
P.O. Box 397, Niceville, FL 32588-0397

(904) 678-8943

FAX (904) 728-2744 • 1-800-476-8943

proposal

QUOTE NUMBER: 172-00

PROPOSAL NUMBER:

PROPOSAL DATE:

ALL PRICES ARE NET. ARE F.O.B. MANUFACTURER'S SHIPPING POINT(S), UNLESS SPECIFIED OTHERWISE. 03/29/94

BILL TO:

425
MR. TIM BRADY
FAX 615-371-9368

SHIP TO:

•
•
•

QUOTE DATE:

Terms of Sale:

Ship Date:

Ship Via:

F.O.B. Source Destination C.A.B. Prepaid Collect Customer P.O.
03/29/94 05/20/94
This quote is good for 30 days unless otherwise stated.

SURFACE

ITEM	QUAN.	PRODUCT	UNIT PRICE	TOTAL
* * * PAGE 2 * * *				
9.	200	CABLEWAVE FLC 12-50J 1/2 INCH FOAM LINE	2.50	500.00
10.	4	CABLEWAVE 738801 TYPE N FM CONNECTORS	31.70	126.80
11.	4	RFS 2 FT. ALL WEATHER PIGTAILS	32.00	128.00
12.	4	CABLEWAVE 713796-003 1/2 GROUND KITS.	23.00	92.00
ORDER TOTAL:				\$8,130.30
Plus Applicable Shipping Charges				

This proposal consisting of page numbers 1 to ___ inclusive, is hereby accepted this ___ day of ___ 19___.

(Purchaser's name, corporation or partnership)

(Signature of owner, partner or officer, state which)

Bill Lawrence
(Signature and title of seller's authorized agent)
3-29-94
(Date)

THE PROVISIONS OF THE REVERSE SIDE HEREOF ARE A PART OF THIS ORDER, AND UPON ACCEPTANCE OF THIS ORDER BY BOTH PARTIES SHALL BE BINDING UPON SELLER AND PURCHASER.

EXHIBIT B

MAINTENANCE AGREEMENT
BROADCAST TECHNICAL SERVICES

Walter J. Stone does hereby agree to provide preventative and emergency repair service for the studio and transmitter installations of BURLEY BROADCASTERS, INC., also known as WSMG AM Radio station, and located in Greeneville, Tn. at Snapps Ferry Road and Kingsley Avenue respectively.

Walter J. Stone agrees to provide all repair and preventative maintenance services relating to broadcast equipment at the above locations that can be accomplished with simple electronic hand tools, a volt ohmmeter, an oscilloscope, an audio signal generator and any other test equipment provided by WSMG.

In consideration for such services, WSMG agrees to pay the sum of one dollar (\$1.00) and other consideration plus taxes per month.

Walter J. Stone shall limit his liability to fifty dollars (\$50.00) for any loss to WSMG resulting from the act of performance of technical maintenance services including but not limited to failure to perform such timely services.

This agreement is for a period of one year beginning September 1, 1989 and will automatically renew itself from year to year thereafter. This agreement may be cancelled upon notice in writing by either WSMG or Walter J. Stone at least thirty days before date of cancellation.

Neither party shall change the terms of this agreement except by mutual consent in writing.

Burley Broadcasters, Inc.

By: David M. Bay

Title: Gen Manager

Date: 8-30-89

Walter J. Stone

Signed: Walter J. Stone

Date: 8-30-89

EXHIBIT C

AVAILABLE TO RENT:

Potomac Field Strength Meters
Delta Impedance Bridge
Delta Receiver/Generator
Tektronix Spectrum Analyzer (for
AM splatter measurements)

Call Steve or Chuck
1-800-54-RADIO
1-410-783-4635

Circle (152) On Reader Service Card

ACOUSTICS

Want To Sell



Circle (76) On Reader Service Card

cond, factory box, schematics, \$1000/lin,
FOB Austin. J Block, The Prod Block, 608
E Fith St, Austin TX 78702. 512-472-8875.

Crown DC 160 amp, silver face, \$250.
Wilsound, 4400 Old Lebanon Rd,
Campbellville KY 42718. 502-780-1505.

Beler FM RF amp, tuned to 107.1,
\$400. R Wynne, KFLS. 503-882-4856.

New 10 W solid state amp, \$24,000.
Call for details. Bill Hoffman, 518-743-
1801.

Want To Buy

WANTED:

Pultec EQ's; Fairchild, Tele-
tronix, dbx, UREI, Sontec
Limiters. Neumann, Tele-
funken, AKG and RCA mics.
MacIntosh or Marantz Gear;
Lang, Neve and API gear. Misc
old tubes and guitars.

**DAN ALEXANDER
AUDIO**
1340 Mission Street
San Francisco, CA 94103
(415) 252-7102
FAX: (415) 252-7524

Belden FIG-68 duo band II 75 ohm coax
cable \$75/100' box. Wilsound, 4400 Old
Lebanon Rd, Campbellville KY 42718.
502-780-1505.

4-bay FMD scale transistor antenna,
on 85.3, good condition, \$800; Jempro
Class A 1 bay FM antenna on 94.3,
good condition, \$800. R Phipps, Griffin
Broadcasting, 301 Jct Hwy #3333,
Kerrville TX 78028. 210-896-1230.

FM - ANTENNAS

Designed and built for your fre-
quency. Choose from 1 to 12
bays and five power levels.
Financing available. Call
Jimmie Joynt at S.W.R.
214-335-3425

TOWERS...bought and sold. Call 1-
800-363-2288.

ROMM 46G, overstocked, 231 sections
available. Call 806-372-5130.

Want To Buy

Low power CP FM antenna on or near
95.9 MHz. E Moody, KJEM, 216 N Main,
Bentonville AR 72712. 501-273-8039.

Correlation / Phase Indicator



A compact alternative to XY displays for
Stereo / Mono Compatibility Checks
Tape Head Azimuth Adjustment
Transmission Path Evaluation
Stereo / Mono Identification
Signal Polarity Testing
CPI-300 - \$ 285

recording studio services
PO Box 3004
Hendersonville, TN 37077
Ph: 615-824-8300 Fax: 615-824-8303
Computer: 75386,311

UREI parametric EQ, \$300; BBE Sonic
Maximizer 822, stereo/balanced, \$260.
R Payne, Song Sketches Prod, 15112
Totten Pl, Shelby Twp MI 48315. 313-
786-1767.

dbx 157 NR (4), simul type-1
encode/decode, indiv level controls on
chnl to match -10 thru +8, 2 units need
repair, manual, \$350 for all/BO plus
shpg. J Mehne, Clearwater Audio
Recdrs, 611 E Miller Rd, Ithaca NY
14850. 607-277-0540.

70420. 210-896-1230.

Pacific Recorder LS-4 switcher, LSM-
10 mon switcher, Audiometrics 8-2 dist
amps. P James, 414 Washington,
Delance OH 43512. 419-782-6581.

Eventide BD-041 bdct delay line w/3, 6,
or 12 sec delay, \$975; UREI BL-40
Modulimiter, mono compressor limiter
SN 632, \$250. R Chambers, KSUE,
3015 Johnstonville Rd, Susanville CA
96130. 916-257-2121.

**We BUY * SELL * TRADE
QUALITY USED EQUIPMENT
317-932-8886**

ADC 144 Pt TT patchbays, excellent
condition, 1 rack space, 3 rows of 48,
top 2 rows normalised, \$129 (you remove
old wiring) or \$199, we totally refurbish
with new front panel, ready to install. TT
cords at cost with purchase! Also 1/4"
PB's. Audio Village, POB 2902, Palm
Springs CA 92262. 619-320-0726, or
Fax 619-320-2454.

0973.

J & I AUDIO/VIDEO

A wholesaler in the Radio
and Television market.
Now running SPECIALS on
audio and video:

**BASF CASSETTES-AMPEX R-Rs
AUDIOPAK, PHELIPAC & ITC CARTS**

For more information
call Kris Elliot at
1-800-942-1711

or write to: J&I Audio/Video
20899 Kelvin Pl.
Woodland Hills, CA 91367

Circle (1) On Reader Service Card

Want To Buy

AT-200 audio cards (2) for McCurdy SS-
7500 board. Jonas Hunter, 814-238-
5085.

Straight Wire Audio MTX-2 audio
matrix. R Burton, Audio Rents, 7237
Santa Monica Blvd, Hollywood CA
90046. 213-874-1000.

HE HALL Electronics

1305-F Seminars Trail Charlottesville VA 22901

Here are just some of the
bargains we have in stock:



Otari MTR-10 reel w/CB-109 autolocator		\$ 2,995
Otari MX-5050B reel (2)		\$ 1,295
Orban 674A stereo equalizer		\$ 495
Orban 424A stereo compressor/limiter		\$ 395
Thacam 133 stereo cassette w/cue track		\$ 495
Valley 610 stereo compressor/limiter		\$ 395
Ramko RS-1616 routing switcher		\$ 595
BE FX-30 FM exciter (2)		\$ 2,596
ITC Delta 3D stereo cart player -	NEW	\$ 1,995
ITC Delta stereo record amplifier -	NEW	\$ 495
Urei equalizers - most models available		CALL
Sennheiser HD-440 II stereo headphones -	NEW	\$ 52
Eventide H-3000B harmonizer - (1 only)	NEW	\$ 1,995
Atronic Research 25kW water cooled load -	NEW	\$ 495
CBS Audimax R11Z TUBE TYPE AGC (as is) (3)		\$ 95
EMT-140 TUBE TYPE plate reverb (2)		\$ 1,595

Call us for the best new & used equipment! **(804) 974-6466** Fax: **(804) 974-6450**

Circle (37) On Reader Service Card

You won't believe what \$ 299* will
buy for your production room!



Full stereo digital effects for your prod room from the ART
FXR Elite what!

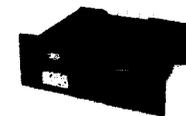
Here's what you get:



- Full bandwidth fidelity in stereo
- True 16 bit digital audio processing with VLSI technology
- Over 250 presets with the ability to vary parameters and store new settings
- Reverb only model FXR also available for \$ 219*
- (Your HE price is much lower!)

Great products at even better prices!

HENRY RADIO



100W to 500W
Solid State



- Single tube grounded grid output with solid state IPA
- Modular construction using quality standard components
- CD quality audio
- Power levels from 100W to 20KW
- Full 1 year warranty

\$400. R Wynne, KFLS. 503-882-4656.

Macintosh MC-2300 pwr amp, 300 W RMS stereo, 600 W RMS mono, excel cond, factory box, schematics, \$1000/firm. FOB Austin. J Block, The Prod Block, 908 E Fifth St, Austin TX 78702. 512-472-8975.

Ampex 620 2 rack mount, one in original case. V Coleman, WXTK, 278 S Sea Ave, W Yarmouth MA 02673. 508-775-7400.

Datatek D525 stereo dist amps w/frame (10), \$2950 plus shpg; frame w/ (6) Datatek D525 stereo dist amps, \$1750 plus shpg. H Frost, WSPR, 195 High St, Holyoke MA 01040. 413-584-6280.

Crown D-75 studio amp, less than yr old, hardly used, \$275. B Rice, WEVO, 207 N Main, Concord NH 03301. 603-228-8910.

Perms-Power S-102 amp with S1420 batt pack, mobile/portable PA unit, 12 W out, excellent condition, \$4100. R Sumner, CAVU Corp, 3322 Applegate Ct, Annandale VA 22003. 703-868-8894.

ANTENNAS/ TOWERS/CABLES

Want To Sell

4-bay FMD scale translator antenna, on 95.3, gal cond, \$800; Jumbo Class A 1 bay FM antenna on 94.3, gal cond, \$600. R Phipps, Griffin Bldg, 301 Jct Hwy #3333, Kerrville TX 78028. 210-895-1230.

FM - ANTENNAS

Designed and built for your frequency. Chosen from 1 to 12 bays and five power levels. Financing available. Call Jimmie Joynt at S.W.R. 214-395-3435

Belden RG-89 duo band II 75 ohm coax cable \$75/100' box. Wilound, 4400 Old Lebanon Rd, Campbellville KY 42718. 502-788-1505.

Andrew HJ9-80 5' air dielectric, 500' on spool. w/connectors on I-80 Central Iowa, \$8000. R Henry, WPIO, 505 Josephine St, Titusville FL 32796. 800-328-8890.

na, 3 or more bays, must be at 107.1 or higher. P Delaney, KKRF, 212 S Division, Stuart IA 50250. 507-895-2065.

Robin 46 tower, 160' with any accessories; Phelps Dodge or similar 6 bay low or medium powered CP antenna in good condition on or close to 92.3 MHz and 3 bay low powered antenna at or near 99.5 MHz. K Diebel, 1207 Louisa St, Rayville LA 71269. 318-728-5852.

AUDIO PRODUCTION

Want To Sell

dbx 165X (2), over easy limiter compressor, \$150 ea. R Phipps, Griffin Bldg, 301 Jct Hwy #3333, Kerrville TX 78028. 210-895-1230.

UREI parametric EQ, \$300; BBE Sonic Maximizer 822, stereo/balanced, \$250. R Payne, Song Sketches Prod, 15112 Totten Pl, Shady Twp MI 48315. 313-788-1787.

Barcus-Berry 202R (2), \$200 ea, FOB Austin. J Block, The Prod Block, 908 E Fifth St, Austin TX 78702. 512-472-8975.

14850. 607-217-0540.

Consolation / Phase Indicator



A compact alternative to XY displays for Stereo / Mono Compatibility Checks
Tape Head Azimuth Adjustment
Transmission Path Evaluation
Stereo / Mono Identification
Signal Polarity Testing
CPI-300 — \$ 285

recording studio services
PO Box 3004
Hendersonville, TN 37077
Ph: 615-824-8300 Fax: 615-824-8300
Computerve: 75388,311

ADC 144 Pt TT patchbays, excel lent condition, 1 rack space, 3 rows of 48, top 2 rows normalised, \$129 (you remove old wiring) or \$188, we totally refurbish with new front panel, ready to install. TT cords at cost with purchase! Also 1/4" PB's. Audio Village, POB 2802, Palm Springs CA 92282. 818-320-0728, or Fax 619-320-2454.

AUTOMATION EQUIPMENT

Want To Sell

KGM EC automation system, new, 12 stereo inputs, mono outputs, line amps, VU's silence sensor, etc, has live assist control package, also capable of satellite programming, all software manuals, source cables included, BO. C Gennaro, WJMS, 222 S Lawrence, Ironwood MI 49938. 908-832-2411.

KGM Inlocarts/Go-Carts, (2) stereo 48 bay Inlocarts touch pad on front panel, \$100 ea; (2) stereo 42 bay Go-Carts, good condition, \$500 ea, buy any two, get rack free. D Greer, WDZ, 1830 Genesee Twn, Flint MI 48502. 313-238-7300.

SMC MSP-1 automation system complete with (4) Otari ARS-1000 R-Rs, (3) 350RSB stereo Carousels, SMC 712 dual cart player, all in 3 matching SMC custom delux racks, manuals, currently in use, \$8000/BO. R Wynne, KFLS. 503-882-4656.

Continental, WJMS, 222 S Lawrence, Ironwood MI 49938. 908-832-2411.

Harris 8998, (4) Otari ARS-1000 reels, (3) SMC 350 mono Carousels, input terminal, printer & manuals, 3 racks, recently removed from service, \$2500. A Chatman, WXCW, POB 1408, Crystal River FL 34423. 904-795-9595.

SMC 380 stereo Carousels (6), will sell one or all, you pay shpg, \$300 ea. J Leutzinger, KFSB, 2620 Dogwood Rd, Joplin MO 64821. 417-624-1310.

Carousels 280 Series (3), \$250 ea; Carousels 350 Series (2), \$400 ea; Audiofile A2, \$400; Ceteq 7000 automation, terminal, 5046 event memory, several source cards, \$1200; ITC 790 R-R decks (2), \$300 ea. E Moody, KJEM, 216 N Main, Bentonville AR 72712. 501-273-8039.

Schefer 963 automation system w/Wyse terminal encoding system, (5) R-R decks 2.5 Audiofiles, printer, remote control, (5) racks, all service manuals, spare parts kit, \$3000/BO. B O'Connor, KDES, Palm Springs CA. 619-325-1211.

HE HALL Electronics

1365-F Seminoke Trail Charlottesville VA 22901

Here are just some of the bargains we have in stock:



Otari MTR-10 reel w/CB-109 autolocator		\$ 2,995
Otari MX-5050B reel (2)		\$ 1,295
Orban 674A stereo equalizer		\$ 495
Orban 424A stereo compressor/limiter		\$ 395
Tascam 133 stereo cassette w/cue track		\$ 495
Valley 610 stereo compressor/limiter		\$ 395
Ramko RS-1616 routing switcher		\$ 595
BE FX-30 FM exciter (2)		\$ 2,596
ITC Delta 3D stereo cart player -	NEW	\$ 1,995
ITC Delta stereo record amplifier -	NEW	\$ 495
Urei equalizers - most models available		CALL
Sennheiser HD-440 II stereo headphones -	NEW	\$ 52
Eventide H-3000B harmonizer - (1 only)	NEW	\$ 1,995
Aktronic Research 25kW water cooled load -	NEW	\$ 495
CBS Audimax RHZ TUBE TYPE AGC (as is) (3)		\$ 95
EMT-140 TUBE TYPE plate reverb (2)		\$ 1,595

Call us for the best new & used equipment! (804) 974-6466 Fax: (804) 974-6450

You won't believe what \$ 299* will buy for your production room!



Full stereo digital effects for your prod room from the ART FXR Elite what!

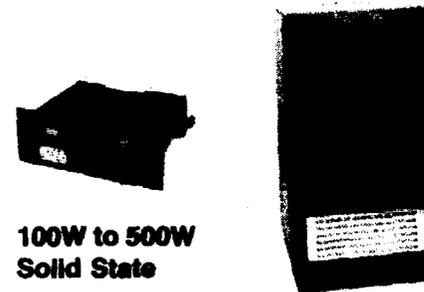
Here's what you get:



- Full bandwidth fidelity in stereo
- True 16 bit digital audio processing with VLSI technology
- Over 250 presets with the ability to vary parameters and store new settings
- Reverb only model FXR also available for \$ 219*
- (Your HE price is much lower!)

Great products at even better prices!

HENRY RADIO



100W to 500W
Solid State

- Single tube grounded grid output with solid state IPA
- Modular construction using quality standard components
- CD quality audio
- Power levels from 100W to 20KW
- Full 1 year warranty

Circle (108) On Reader Service Card

Delta Impedance Bridge
Delta Receiver/Generator
Tektronix Spectrum Analyzer (for
AM splatter measurements)

Call Steve or Chuck
1-800-54-RADIO
1-410-783-4635 FAX

Circle (7) On Reader Service Card

Radio World
Broadcast Equipment
Exchange

...A great place
to advertise!

Call Simone at
800-336-3045
for information

RCA & LPB phono preamps, RCA for
\$50 & LPB for \$75. V Coleman, WXTK,
278 S Sea Ave, W Yarmouth MA 02873.
508-775-7400.

Stanton 310 preamp, \$100. L Schmitz,
Soundmax, 8116 Bruce Ct, Gaithersburg
MD 20877. 301-948-4208.

Detastek D625 stereo dist amps with
frame (10), \$2950 plus shipping; frame
with (6) Detastek D625 stereo dist amps,
\$1750 plus shipping. H Froot, WSPR, 195
High St, Holyoke MA 01040. 413-584-
6280.

RTS-405 stereo TT preamp (2), \$145/ea
+ ship, used 6 mths. B Lord, Lord Bldg,
13313 SE 208th St, Kent WA 98042. 206-
681-2374.

Perma-Power 8-102 amp with \$1420
battery pack, mobile/portable PA unit, 12
W out, excellent condition, \$4100. R
Sumner, CAVU Corp, 3882 Applegate Ct,
Armandale VA 22003. 703-888-8894.

New 10 kW amplifier under \$24,000.
Call for details. Bill Hoffman, 518-743-
1601.

ARRIVE TO HAVE CABLE RANGE CONNECTOR
for 3' Heliax, \$175; Andrew splice for 3'
Heliax, \$250; Cablewave EIA flanged
connector for 3' Heliax, \$175. A Chalmers,
WXCW, POB 1488, Crystal River FL
32823. 904-795-7220.

FM - ANTENNAS

Designed and built for your fre-
quency. Choose from 1 to 12
bays and five power levels.
Financing available. Call
Jimmie Joynt at S.W.R.
214-336-3425

ERI FM7AE 7-bay HP 1087 model w/di-
cers, 100.3 MHz. J Zichew, WISM, 1819
Mitchell Ave, Eau Claire WI 54701. 715-
636-9478.

Andrew HJ9-88 5' air dielectric, 500' on
spool with connectors on I-80 Central
Iowa, \$8000. R Henry, WPID, 505
Josephine St, Thuleville FL 32798. 800-
328-8880.

ERI FM1-3 3 bay tuned to 95.9, \$1000. F
Troient, WMWF-WIEZ Radio, 12 1/2 E
Market St, Levittown PA 17044. 717-
248-6757.

Used 700-000' tower; (2) used 400 - 500'
towers. K Kuenzle, KFKE, 511 W 5th St,
Washington MO 63000. 314-230-8800.

3 or 4 bay antennas tuned to 90.7 MHz
with brackets for small tower, with or with-
out heaters or raydome. K Austin, KFXL,
1101 Hwy 81N, Marlow OK 73065. 405-
658-2558.

Coax switch (4) port 1 5/8" motorized,
Bird 5 kW dummy load, RCA 11708 on-air
light. L Lindstrom, WPOK, 315 N Mill,
Pontiac IL. 815-844-6101.

AUDIO PRODUCTION

Want To Sell

Seay PCM-501ES digital recording
adapter (3), \$1800 ea plus freight; other
assorted audio broadcast equipment, call
for list. Linda, 800-621-2537.

4bx 105 4 chnl encoder/decoder Type I NR
(2), \$200 ea/\$375 both. P Chibley, Chibley
Music, POB 751 Murray Hill Sta, NYNY
10158. 212-988-2219.

Footex 4010 SMPTE reader/generator,
\$325. B Seibert, Eclair Engineering, 221
Pine St, Florence MA 01060. 413-584-
6767.

We BUY * SELL * TRADE
QUALITY USED EQUIPMENT
317-982-8586

CRL Dyanefax DX-2 single ended stereo
noise reduction, \$225; Balar Audio Sentry
AS-1 (4), 3 years old, \$95/ea; Aphex
M250 Aural Exciter III, \$415; Geniner
TC100R with DTMF decoder, \$245; (5)
Trimw/ADC 2 rows of 1/4" jacks, half-nor-
malled, brought out to ADC Ultrapatch,
\$105/ea. Wes, 818-798-9128.

Sparta 25 Hz tone gen & filter, \$200; (3)
Sparta cart PB with rack, mono, \$900;
Sparta A-20B 8 channel mono 1973 con-
sole, \$1000; (2) Sparta TTs with ton-
earns & mono preamps, \$300 ea. P
Bridges, KGMK, 202 E Cross, Benton AR
72015. 501-778-8257.

at cost with purchase! Also 1/4" PB's.
Audio Village, POB 2902, Palm Springs
CA 92262. 619-320-0728, or Fax 619-
320-2454.

J & I AUDIO/VIDEO

A wholesaler in the Radio
and Television market.
Now running SPECIALS on
audio and video:
BA8F CASSETTE-AMPEX R-Rs
AUDIOPAK, FIDELIPAK & ITC CARTS

For more information
call Kris Elliot at
1-800-842-1711
or write to: J&I Audio/Video
20800 Kelvin Pl.
Woodland Hills, CA 91367

Circle (48) On Reader Service Card

Kurzweil Midboard, \$1190; Kurzweil
1000 Px Plus sound module, \$790;
Kurzweil 1000 Hz sound module, \$880;
Kawai Q-80 sequencer, \$190; all mint. M
Osborne, WKSQ, POB 9494, Ellsworth
ME 04805. 207-867-7573.

HE HALL Electronics

1305-F Seminole Trail Charlottesville VA 22901

Here are just some of the
bargains we have in stock:

	NEW	CALL
LPB-8 Pot Stereo Console		
Ramko RS-1616 routing switcher		\$ 595
BE FX-30 FM exciter		\$ 2,696
ITC Delta 3D stereo cart player -	NEW	\$ 1,995
ITC Delta stereo record amplifier -	NEW	\$ 495
Sennheiser HD-440 II stereo headphones -	NEW	\$ 52
Eventide H-3000B harmonizer - (1 only)	NEW	\$ 1,995
Harris AM-90 AM Mod Monitor -	NEW	\$ 995
Marantz PMD-500 Dual Cassette -	NEW	\$ 429
CRL FM2G FM Stereo Audio Processing Pkg.		\$ 1,195
Micro-Track 303 Tone Arms	NEW	\$ 99
Potomac Instruments AM-19 Antenna Monitor		\$ 495
Telos 10 10 line digital hybrid		\$ 995
Fidelipak E50-10 Cart splice finder		\$ 595
ITC DCM-1 set encoder/decoder & 2 decoders		\$ 145
Andrew 78ARF 3 1/8" EIA Connector - (4)	NEW	\$ 249

Call us for the Best New & Completely Rebuilt Equipment! (804) 974-6466

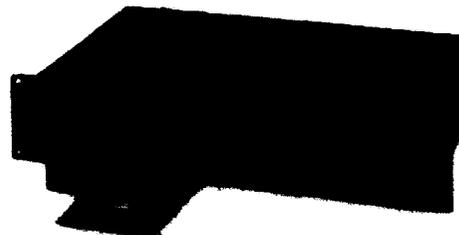
gemini

SOUND PRODUCTS WITH SOUND IDEAS

Professional CD Player with Variable Pitch Con-
trol. This CD unit gives you years of clean, worry-
free sound at a price that will blow your mind with-
out blowing your budget.

List Price: \$ 572

CALL for Introductory HE Price!



SINE SYSTEMS

RFC-1/B Dial-Up Remote Control
&
DAI-1 Dial-Up Audio Interface



The DAI-1 easily handles EBS requirements for "walk
away" operations. It also allows direct access to the air
chain in addition to providing remote broadcasts.

The RFC-1/B provides transmitter power control, has
alarm dial out for 6 numbers, and provides up to 64
channels of control and metering. The best & lowest
cost 'dial-up' remote control available.

Fax: (804) 974-6450

Circle (163) On Reader Service Card

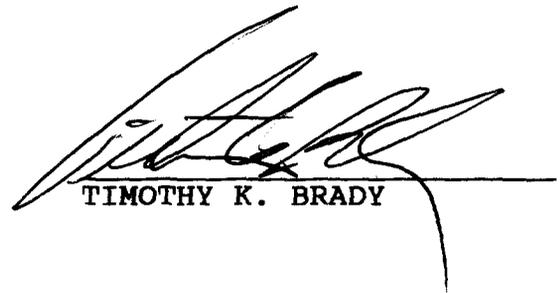
CERTIFICATE OF SERVICE

I, Timothy K. Brady, hereby certify that on or before the
31st day of March, 1994, I will have served a copy of the
foregoing Reply to Opposition to Second Petition to Enlarge by
First Class mail, postage prepaid upon the following:

Honorable John M. Frysiak
Administrative Law Judge
Federal Communications Commission
2000 L Street, NW, Room 223
Washington, DC 20554

Robert A. Zuaner, Esq.
Hearing Branch
Federal Communications Commission
2025 M Street, NW, Room 7212
Washington, DC 20554

J. Richard Carr, Esq.
P.O. Box 70725
Chevy Chase, MD 20813-0725
(Co-Counsel for Darrell Bryan)



TIMOTHY K. BRADY