

FEDERAL COMMUNICATIONS COMMISSION
FEE PROCESSING FORM

FOR
FCC
USE
ONLY

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Please read instructions on back of this form before completing it. Section I MUST be completed if you are applying for concurrent actions which require you to list more than one Fee Type Code, you must accompany all payments. Only one Fee Processing Form may be submitted per legibly. All required blocks must be completed or application/filing will be returned. 02-14-94 8300376 001

SECTION I

APPLICANT NAME (Last, first, middle initial)

MEYER, FALLER, WEISMAN & ROSENBERG, P.C.

PR 93-35

MAILING ADDRESS (Line 1) (Maximum 85 characters - refer to Instruction (2) on reverse of form)

4400 JENIFER STREET, NW SUITE 380

MAILING ADDRESS (Line 2) (if required) (Maximum 85 characters)

CITY

WASHINGTON

STATE OR COUNTRY (if foreign address)

DC

ZIP CODE

20015

CALL SIGN

OTHER FCC IDENTIFIER

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in FCC Fee Filing Guides. Enter in Column (B) the Fee Multiple, if applicable. Enter in Column (C) the result obtained from multiplying the value of the Fee Type Code in Column (A) by the number entered in Column (B), if any.

(A)	(B)	(C)	FOR FCC USE ONLY
FEE TYPE CODE	FEE MULTIPLE (if required)	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	
(1) P D W	1	\$ 105.00	

SECTION II

— To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)	(B)	(C)	FOR FCC USE ONLY
FEE TYPE CODE	FEE MULTIPLE (if required)	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	
(2)		\$	
(3)		\$	
(4)		\$	
(5)		\$	

ADD ALL AMOUNTS SHOWN IN COLUMN C, LINES (1) THROUGH (5), AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE.

TOTAL AMOUNT REMITTED WITH THIS APPLICATION OR FILING
\$ 105.00

FOR FCC USE ONLY
105.00

INSTRUCTIONS FOR COMPLETING FEE PROCESSING FORM, FCC FORM 155, August 1991

- (1) **"Applicant Name"** - Enter the name (last, first, middle initial) of the applicant as it appears on the original application or filing being submitted with this Fee Processing Form. If company, enter name which is used commercially.
- (2) **"Mailing Address (Line 1)"** - Enter the street address or post office box number to which the applicant wishes correspondence sent.
- (3) **"Mailing Address (Line 2)"** - This line may be used for further identification of the address if additional space is required.
- (4) **"City"** - Enter the name of the city associated with the given street address.
- (5) **"State or Country"** - Enter the appropriate two-digit state abbreviation as prescribed by the U.S. Postal Service. If address is foreign, enter the appropriate country name here.
- (6) **"ZIP Code"** - Enter the appropriate five or nine-digit ZIP Code prescribed by the U.S. Postal Service.
- (7) **"Call Sign or Other FCC Identifier"** - Enter the applicable call or unique FCC identifier, if any, as shown on your attached application or filing. If applying for a service affecting more than one call sign, enter one call sign only.
- (8) **Column (A), "Fee Type Code"** - Enter correct Fee Type Code(s) from the appropriate Fee Filing Guide. Only one Fee Processing Form may be submitted per application or filing. Inaccurate or erroneous Fee Type Codes may result in your application or filing being returned to you without further processing.
- (9) **Column (B), "Fee Multiple"** - Certain applications and filings may request action with respect to more than one station, license, frequency, or party and can be submitted together with one check if they meet specific conditions. This column is used only if a multiple, i.e., two or more, is being applied for. Examples of when this would be used are renewing more than one call sign, frequency, station, or the transfer of control of more than one station. Refer to the appropriate Fee Filing Guide for additional information.
- (10) **Column (C), "Fee Due for Fee Type Code in Column (A)"** - Enter in this block the amount of the fee associated with the Fee Type Code shown in Column (A) (times (X) the fee multiple, if required).
- (11) **"Total Amount Remitted With This Application or Filing"** - Enter the total of lines (1) through (5) of Column (C). This amount should equal the amount of your check or money order. We will not accept multiple checks.

HOW TO SUBMIT APPLICATIONS AND FILINGS

- o Each application or filing should be assembled with the Fee Processing Form, FCC Form 155, stapled to the top of the application with the check placed on top of the Fee Processing Form. **DO NOT STAPLE THE CHECK TO THE APPLICATION OR FEE PROCESSING FORM, FCC FORM 155.** Required copies of applications should be clearly identified as "duplicate copy" and placed behind the original package. **"Stamp and receipt" copies should be placed on top of the original package and CLEARLY identified as return copies.** Extraneous material and extra copies should be avoided at all times. Failure to follow these instructions will delay the processing of your submission.
- o Completed applications or filings should be mailed to the proper address shown in the Fee Filing Guide for the particular service for which you are applying or making a filing. **All applications and filings must be properly addressed to the appropriate P.O. box number, even if hand delivered** to the address listed below. Applications received before midnight on a normal business day will receive that day's date as the receipt date. Deliveries made after midnight on Fridays will not be "officially" receipted until the next Monday. Applications received on weekends and government holidays are dated the next regular business day.
- o A single check, bank draft or money order made payable to the Federal Communications Commission and denominated in U.S. dollars and drawn upon a U.S. financial institution must be included with each application or filing requiring a fee. No postdated, altered or third-party checks will be accepted. Do not send cash.
- o Parties hand delivering applications or filings may receive dated receipt copies by presenting copies of the applications or filings to the acceptance clerk at the time of delivery. **Receipts will be provided for mail-in applications or filings if an extra copy of the application or filing is provided along with a self-addressed stamped envelope. Only one piece of paper per application or filing will be stamped for receipt purposes.**

REMEMBER

- o A separate completed Fee Processing Form is required with each application or filing except in certain circumstances. Please refer to the appropriate Fee Filing Guide for additional information.
- o A wrong Fee Type Code or incorrect remittance may result in your application or filing being returned without processing, or result in the dismissal of your application or filing. Please ensure that FEE TYPE CODES are correct and that your check or money order equals the amount shown in the TOTAL AMOUNT REMITTED WITH THIS APPLICATION OR FILING block before submitting your application or filing.
- o If you have any questions completing this form, please call the Fees Hotline, 202/632-FEES.

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 1, Subpart G of the Commission's rules authorize the FCC to request the information on this form. The information requested is required in order to obtain a license or authorization from the Commission. The purpose of the information is to provide a means to link a fee payment to a specific invoice, application or filing. The information will be used by the Commission to maintain data concerning fees paid to the Commission, for internal financial control, audit, and reporting purposes. Information requested on this form will be available to the public. Your response is required to obtain a license or other authorization from the Commission.

Public reporting burden for this collection of information is estimated to average 10 minutes per response, including the time for reviewing instructions, searching data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Federal Communications Commission, Office of Managing Director, Washington, DC 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0440), Washington, DC 20503.

THIS ADDRESS IS FOR HAND CARRY OR COURIER DELIVERY ONLY:

Federal Communications Commission
c/o Mellon Bank
Three Mellon Bank Center
525 William Penn Way
27th Floor, Room 153-2713
Pittsburgh, Pennsylvania 15259-0001
(Attention: Wholesale Lockbox Shift Supervisor)

ECC/MELLEN JAN 31 1994

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

In the Matter of:

MESSAGE CENTER BEEPERS, INC.)
)
Waiver of 47 C.F.R.)
90.495(A)(5) For Extension)
Of Time)

93-35

To: The Private Radio Bureau

REQUEST FOR WAIVER

Respectfully submitted,

MESSAGE CENTER BEEPERS, INC.

By: Alan S. Tilles, Esquire
David E. Weisman, Esquire

Its Attorneys

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January 28, 1994

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SUMMARY

Message Center Beepers, Inc. and its affiliates ("Message Center"), hereby respectfully request a temporary waiver of Section 90.495(a)(5) of the Commission's Rules. The waiver seeks to grant Message Center a twenty-four month period to convert certain of its existing private carrier paging ("PCP") transmitters from their current multi-frequency transmitter use to dedicated transmitters while retaining exclusivity in accordance with the Commission's Report and Order in PR Docket No. 93-35.

In the Notice of Proposed Rulemaking, the Commission proposed that PCP licensees could earn exclusivity provided that they satisfy certain construction and coverage requirements. The NPRM did not prohibit licensees from using multifrequency transmitters to meet their construction requirements. Consistent with: (1) industry practice; (2) Message Center's business plan; and (3) the perceived intent of the NPRM, Message Center continued to construct on a rapid basis its PCP system using multifrequency transmitters offering such paging service to the public in its operations. To date, Message Center has expended more than \$5 million dollars on its PCP operations. Message Center currently offers service in a coverage area which includes more than 90 of the top 100 MSA's.

Notwithstanding the support of the majority of commenting parties, the Commission implemented Rule Section 90.495(a)(5) which, when applied to constructed and operating systems, prohibits licensees from counting multiple frequency transmitters toward exclusivity on multiple frequencies. Therefore, even though

Message Center provides PCP service to the public from over 505 current transmitters on its two (2) operating PCP frequencies, it needs to add an additional 240 dedicated transmitters in order to meet the dedicated transmitter requirement under the recently adopted rules.

The NPRM did not give notice that the Commission would consider limiting the use of multifrequency transmitters in exclusivity requests and the Commission's Report and Order did not allow for a transition period or slow growth period to apply to grandfathered or incumbent licensees. Therefore, because of the number of additional transmitters required by Message Center to meet the dedicated transmitter rule, Message Center will need a temporary waiver of the multifrequency transmitter rule for 24 months in which to change-out its multifrequency transmitters to dedicated transmitters.

("MSAs"). Message Center is currently experiencing 40 percent annual growth in a service which includes an estimated 50 million people.

In developing its paging system, Message Center has met the demands for service by Message Center customers by acquiring PCP authorizations for more than 600 sites. Message Center's licenses include authorization for 929.4875 MHz in the northeast portion of the country,³ and 929.4125 MHz on a nationwide basis. Each system uses a multifrequency transmitter which serves more than one PCP frequency.⁴

In the Notice of Proposed Rulemaking,⁵ the Commission proposed that PCP licensees could earn exclusivity provided that they satisfy certain construction and coverage requirements.⁶ The NPRM did not prohibit licensees from using multifrequency transmitters to meet their construction requirements.⁷ Consistent with: (1) industry practice; (2) Message Center's business plan; and (3) the

³Message Center is requesting the waiver on 929.4875 MHz in the northeast region of the country, although Message Center has applications pending to become a licensee on 929.4875 MHz on other parts of the country.

⁴Message Center entered into Networking Agreements with other paging operators to construct multi-frequency transmitters which include 929.4125 MHz in order to further expand the coverage area for Message Center customers throughout the country.

⁵Notice of Proposed Rulemaking, PR Docket 93-35, 8 FCC Rcd 2227 (1993) ("NPRM").

⁶See Section 90.495(a)(1)-(3).

⁷In this regard with few exceptions, the majority of interested parties commenting on this issue in the proceeding supported the continued use of multifrequency transmitters for purposes of qualifying for exclusivity.

perceived intent of the NPRM, Message Center continued to construct on a rapid basis its PCP system using multifrequency transmitters offering such paging service to the public in its operations. To date, Message Center has expended more than \$5 million dollars on its PCP operations. Message Center currently offers service in a coverage area which includes more than 90 of the top 100 MSA's.

Based upon the ability of a carrier to utilize multifrequency transmitters in its operation, Message Center would qualify for exclusivity on each of its PCP frequencies at the present time. In this respect, attached as Exhibit A is a report showing that Message Center has met the requirements for exclusivity on its nationwide channel. Attached as Exhibit B is a similar report showing that it has met the requirements for exclusivity on its regional frequency.

Notwithstanding the support of the majority of commenting parties, the Commission implemented Rule Section 90.495(a)(5) which, when applied to constructed and operating systems, prohibits licensees from counting multiple frequency transmitters toward exclusivity on multiple frequencies. Therefore, even though Message Center provides PCP service to the public from over 505 current transmitters on its two (2) operating PCP frequencies, it needs to add an additional 240 dedicated transmitters in order to meet the dedicated transmitter requirement under the recently adopted rules.⁸

⁸Of the 505 PCP transmitters from which Message Center currently provides nationwide and regional service, 137 are owned and operated by Message Center and the remainder are in service

The NPRM did not give notice that the Commission would consider limiting the use of multifrequency transmitters in exclusivity requests and the Commission's Report and Order did not allow for a transition period or slow growth period to apply to grandfathered or incumbent licensees. Therefore, because of the number of additional transmitters required by Message Center to meet the dedicated transmitter rule, Message Center will need a temporary waiver of the multifrequency transmitter rule for 24 months in which to change-out its multifrequency transmitters to dedicated transmitters.⁹ Although Message Center does not oppose the Commission's decision in the Report and Order regarding multifrequency transmitters, the lack of notice to Message Center resulted in insufficient time for Message Center to make adequate business preparations to retain the licensing status (i.e. the lack of co-channel licensees) which it currently enjoys.

pursuant to networking agreements.

⁹In a Public Notice issued on January 10, 1994 (DA 94-35), the Private Radio Bureau clarified certain procedures for grandfathered 929-930 MHz paging operators to qualify for exclusivity. Pursuant to the Public Notice, the Bureau clarified that in the case of incumbents who request exclusivity based on grandfathered licenses or applications (i.e., licenses granted or applications filed prior to October 14, 1993) the eight (8) month deadline for demonstrating compliance with the Commission's exclusivity rules would run from the date the Commission issues a Public Notice conditionally designating the incumbent system as exclusive. Where an applicant's exclusivity request is based upon pre-October 14, 1993 applications which are pending but are not yet granted, the designation of exclusivity will occur when the last such application is granted.

II. MESSAGE CENTER'S WAIVER REQUEST

A waiver of Section 90.495(a)(5) of the Commission's Rules is necessary to permit Message Center additional time to add the 240 dedicated transmitters which are required in order to retain exclusivity for its regional, nationwide and local systems under Section 90.495(a)(5).¹⁰

A. Grant Of Message Center's Waiver Is Appropriate

Waivers of Commission Rules are appropriate where an applicant can show "special circumstances".¹¹ The grant of Message Center's Waiver presents circumstances which justify a waiver of the rules and would not undermine the underlying rationale behind the adoption of Section 90.495(a)(5).

Message Center, to date, has expended in excess of \$5 million on the provision of PCP service and is committed to expend such additional investment as required to convert the use of its multifrequency transmitters to dedicated transmitters under Section 90.495(a)(5) of the Rules. Message Center's construction of its systems using both dedicated and multifrequency transmitters was consistent with existing industry practice and remains permitted under Commission Rules. Taking such an approach, Message Center was able to offer to the public a competitive system at a cost

¹⁰Certain of the additional dedicated transmitters will be placed in service at existing sites now operated on a multifrequency basis while others may be added at new locations to expand the geographic coverage of the Message Center system.

¹¹See, WALT Radio v. FCC, 418 F. 2d 1153 (D.C. Cir. 1969); In re Request of Fleet Call, Inc. for a Waiver and Other Relief to Permit Creation of Enhanced Specialized Mobile Radio Systems in Six Markets, 6 FCC Rcd. 1533 (1991).

which would benefit the public and not contribute to the warehousing or the growth in speculation of frequencies.

Message Center's ongoing operation and history is clearly demonstrative of a bona fide operator which currently has over 500 base station facilities in service on its RCC and PCP frequencies. Message Center has 6 business offices and sales facilities and employs over 270 people in its various telecommunications services. In sum, there is no speculation by Message Center in the conduct of its business. Message Center's clear intent is only the need for it to operate exclusively on its PCP frequencies.

Message Center's selection of frequencies and its decision to propose to dedicate a separate frequency for nationwide use is consistent with marketing demands which allow for the differing nature of nationwide and regional markets in operation and in satisfaction of customer needs. Those customers utilizing nationwide frequencies constitute a potentially large and growing segment of the marketplace which are dominated by various executives which need to be in touch when they are out of town or on business. The coverage necessary for operation of a nationwide system includes coverage along major traffic corridors and core business districts of major metropolitan areas as well as coverage of airports. In contrast, configuration on a local or regional system takes into account different types of paging use and coverage requirements.

The underlying rationale of the multifrequency transmitter rule for qualification of exclusivity was to prevent licensees from

claiming multiple channel exclusivity with only a limited investment.¹² This is not the case with Message Center's already demonstrated investment and operation in the paging industry. The Commission's own calculations of 70 transmitters per region at \$20,000.00 per transmitter for purposes of qualification for nationwide exclusivity on one (1) channel would necessitate a \$6 million investment. The required investment for regional exclusivity for one region would be \$1,400,000.00. Message Center's investment of in excess of \$5 million to date clearly demonstrates that Message Center's Waiver Request herein does not violate the underlying intent of the Rule.

Without the ability of an incumbent paging carrier utilizing multi-frequency transmitters to transition from the use of such multi-frequency transmitters to dedicated transmitters in an orderly fashion, carriers are faced with the artificial requirement to reconstruct transmitters in a period of time which is unrealistic, uneconomical and opposed to the public interest. Without a grant of the Waiver herein requested, Message Center would be faced with the nearly impossible task of having to find an acceptable number of transmitters available as well as find the personnel to implement construction in a very unrealistic time frame.

Message Center has been in discussions with a number of major vendors of 900 MHz paging base stations and has concluded that it would be extremely difficult if not impossible to secure, in an

¹²See, Report and Order, supra at para. 17.

adequate time frame, the minimum transmitters necessary to implement a dedicated transmitter change-out.¹³ There is no doubt that there will be a significant effort by all of the licenses at 900 MHz attempting to construct facilities and change over multifrequency transmitters all at the same time in order to meet the construction time frame set forth in the Report and Order.

Even if Message Center were able to procure all of the necessary transmitters within the appropriate time frame, it would still be faced with an unreasonable demand on its technical staff as well as its site technicians and site installers to install all of the transmitters within the limited time frame. The lack of personnel and lack of available transmitters to make the conversion from multifrequency to dedicated transmitters, at best, uncertain and, in all probability, impossible.

B. Grant Of The Waiver Will Be In The Public Interest

As manufacturers are unable to deliver equipment in a timely fashion or to the extent sites are not available or to the extent operators are forced to purchase and expend funds without the ability to budget and transition their already operating systems in an orderly fashion will not serve the public interest. Such a

¹³The Commission's actions in the Report and Order has put enormous pressure upon the manufacturers to deliver equipment throughout the country to a number of carriers, at the same time. In this respect, both Motorola and Glenayre have indicated that they have recognized difficulties in their delivery schedules caused by the Commission's exclusivity rules and the possibility that they would be unable to fill any large orders until late 1994. Further, the natural market place workings often lead to delivery significantly beyond the date of manufacturers original projected dates.

requirement will only create the needless expenditure of funds, time and energy within an unrealistic time period which may only need to be redone at a later date. These pressures placed upon a company at one time could put unfair pressure as to routine maintenance, repair and service upon existing systems which satisfy current customer service and needs. It would draw away from the orderly operation of its current systems in order to meet an artificial construction date not otherwise anticipated upon the original adoption of the NPRM.

In addition, the public interest would not be served if the waiver is not granted as Message Center is currently offering service to thousands of customers on its PCP systems. To the extent Message Center is not able to reconstruct within the deadline given by the Commission without a waiver, its system could be forced to share its frequencies, which would be contrary to the underlying intent originally adopted to further the development of a number of competitive exclusive local, regional and nationwide carriers as proposed in PR Docket No. 93-35. In addition, technical difficulties would ensue because changes in interconnection of facilities would be required for co-channel licensee seeking to share the channel to interconnect to Message Center's up-link facilities. This would immediately cause problems of capacity as well as limit the geographic coverage and use of the frequency as otherwise intended by Message Center in its original commitment to construction and operation of its systems.

Recognition of the need for temporary waiver of the Rule section will allow Message Center to continue in operation and to implement their system in an orderly fashion in such a way so as to continue to provide local, regional and nationwide competition. This competition leads to competitive market places which benefits the customers in offering to that customer a variety of services, carriers and pricing.

Finally, given the fact that a number of parties¹⁴ have filed Petitions for Reconsideration and Clarification of the Commission's Report and Order, amongst which they have asked the Commission to reconsider and to allow extended implementation to existing or grandfathered licensees, grant of this temporary waiver pending the Commission's rule making or in conjunction with its Reconsideration will allow Message Center time to transition and to employ additional dedicated transmitters in its systems in an orderly manner without disruption of its business.

¹⁴See, e.g., the Petition for Reconsideration and Clarification filed by the Association for Private Carrier Paging Section of the National Association of Business and Educational Radio, Inc.

III. **CONCLUSION**

WHEREFORE, the premises considered, Message Center Beepers, Inc. respectfully requests that the Commission immediately GRANT a waiver of Rule Section 90.495(a) for a period of twenty-four (24) months as set forth above.

Respectfully submitted,

MESSAGE CENTER BEEPERS, INC.

By: 
Alan S. Tilles, Esquire

By: 
David E. Weisman, Esquire

Its Attorneys

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January 28, 1994

NABER Nationwide Exclusivity Request
January 20, 1994

ST	CITY	CALLSIGN	DATE FILED WITH NABER
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AL	BIRMINGHAM		10/16/92 10/16/92
	HUNTSVILLE		10/16/92
	MONTGOMERY		10/16/92
	PRICHARD	WPCY866	4/22/93
AR	BENTONVILLE	WPCY852	4/12/93
	LITTLE ROCK	WPCR412	8/16/93
AZ	APACHE JUNCTION		10/9/92
	MESA	WPCZ749	5/12/93
	PHOENIX		10/9/92 10/9/92 10/9/92
		WPCZ749	5/12/93
		WPCZ749	5/12/93
	TUCSON	WPCZ749	5/12/93
CA	AGUA DULCE		10/22/93
	AUBERRY		7/23/92
	AUBURN		7/23/92
	BAKERSFIELD		7/17/92
	BARSTOW		7/23/92
	BEAR VALLEY		7/23/92
	BERKELEY		7/23/92
	BERRY CREEK		7/23/92
	BEULAH PARK	WPDD827	6/1/93
	CAMERON PARK		7/23/92
	CARPENTERIA		7/17/92
	CENTURY CITY		7/23/92
	CHATSWORTH		7/23/92
	CHICO	WPDD816	6/1/93
	CHULA VISTA		7/23/92
	COALINGA		7/23/92

NABER Nationwide Exclusivity Request

January 20, 1994

ST	CITY	CALLSIGN	DATE FILED WITH NABER
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CA	CONCORD		7/23/92
	CORNING		7/23/92
	CORONA		7/23/92
	CRESTLINE		7/23/92
	DALY CITY		7/23/92
	DEL DIOS		7/23/92
	DUBLIN	WPDD827	6/1/93
	EL TORO		7/23/92
	ESCONDIDO		7/23/92
	EXETER		7/23/92
	FALLBROOK		7/23/92
	FREMONT		7/23/92
	GLENDALE		7/23/92
	IGNACIO		7/23/92
	INDIO		7/23/92
	LA HABRE	WPDW259	9/27/93
	LA JOLLA	WPDD817	6/1/93
	LONG BEACH		12/21/92
	LOS ANGELES		7/23/92 10/22/93
	MCKITTRICK		7/17/92
	MIDDLETOWN		7/17/92
	MILL VALLEY		7/23/92
	MODESTO		7/23/92
	MORGAN HILL		7/23/92
	NAPA		7/23/92
	NEWPORT BEACH		7/23/92
	OCEANSIDE		12/3/93
	ORANGE		7/23/92

NABER Nationwide Exclusivity Request
 January 20, 1994

ST	CITY	CALLSIGN	DATE FILED WITH NABER
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CA	OXNARD		7/17/92
	PACIFICA		7/23/92
	PALM SPRINGS		7/23/92
	PALMDALE		7/23/92
	PASADENA		7/23/92
	PENNGROVE		7/23/92
	POLLACK PINES	WPDD816	6/1/93
	RANCHO CORDOVA		7/23/92
	RANCHO PALOS VERDES		7/23/92
	REDDING		7/23/92
		WPDD816	6/1/93
	RIO NIDO		7/17/92
	RIVERSIDE		7/23/92
	SACRAMENTO		7/23/92
	SALINAS		7/23/92 7/23/92
	SAN CLEMENTE		7/23/92
	SAN DIEGO (BEKINS)		7/23/92
	SAN DIEGO (GRT WEST)_		7/23/92
	SAN DIEGO (MT WOODSN)		7/23/92
	SAN DIEGO (SAN MIGUL)		7/23/92
	SAN DIEGO (SOLEDA)		7/23/92
	SAN FRANCISCO		7/23/92
	SAN JOSE		7/17/92
	SAN LUIS OBISPO		7/23/92
	SANTA BARBARA		7/17/92 12/3/93
	SANTA CATALINA		7/23/92

NABER Nationwide Exclusivity Request

January 20, 1994

ST	CITY	CALLSIGN	DATE FILED WITH NABER
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CA	SANTA ROSA	WPDD827	6/1/93
	SANTA SUSANA		7/23/92
	SIGNAL HILL		7/17/92
	SIMI VALLEY		12/3/93
	SQUAW VALLEY		7/23/92
	STANFORD		7/23/92
	STOCKTON		7/23/92
	SUNNYMEAD		7/23/92
	SUNOL		7/23/92
	SUTTER		7/23/92
	TABOE CITY		7/23/92
	UKIAH		7/23/92
	UPLAND		7/23/92
	VACAVILLE		7/23/92
	VENTURA		10/22/93
	VICTORVILLE		7/23/92
	VISTA		7/23/92
	WALNUT CREEK		7/23/92
	WESTLY		7/23/92
	WOODSIDE		7/23/92
CO	ASPEN	WPK376	8/3/93
	COLORADO SPRINGS	WPCJ723	3/8/93
	EL DORADO SPRINGS	WPCJ723	3/8/93
	ENGLEWOOD	WPCJ723	3/8/93
	LOUISVILLE	WPCJ723	3/8/93
	MASONVILLE	WPCJ723	3/8/93
	PUEBLO	WPDW260	9/27/93
	VAIL	WPDW261	9/27/93

NABER Nationwide Exclusivity Request
January 20, 1994

ST	CITY	CALLSIGN	DATE FILED WITH NABER
---	-----	-----	-----
CT	BRIDGEPORT	WPDR379	8/5/93
	COLCHESTER	WPCP302	3/31/93
	DANBURY	WPDR379	8/5/93
	EAST KILLINGLY	WPCP302	3/31/93
	FAIRFIELD	WPDR379	8/5/93
	FARMINGTON	WPCN343	2/10/93
	GLASTONBURY	WPCS862	3/8/93
	GREENWICH	WPCS862	3/8/93
	HAMDEN (WESTROCK)	WNHG723	7/10/92
	HARTFORD (BUSHNELL)	WPCS862	3/8/93
	HARTFORD (WOODLAND)	WNHG723	7/10/92
	KILLINGWORTH	WPDB233	5/18/93
	MERIDEN	WPDD818	6/2/93
	MILFORD	WPCN343	2/10/93
	NEW HAVEN	WPCP309	3/31/93
	NEW LONDON	WPDB956	2/5/93
	NEW MILFORD	WPCS862	3/8/93
	NORTH STONINGTON	WPDB956	2/5/93
	NORWALK	WPDB956	2/5/93
	NORWICH	WPCY826	4/16/93
	OLD SAYBROOK	WPDR379	8/5/93
	SEYMOUR	WPCS862	3/8/93
	STAFFORDVILLE	WPDR379	8/5/93
	STAMFORD	WPAT264	7/10/92
	STORRS	WPCN343	2/10/93
	TOLLAND	WNHG723	7/10/92
	TORRINGTON	WPDB956	2/5/93
	WATERBURY	WPCP309	3/31/93

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CT	WILTON	WPCR531	4/12/93
	WINDSOR LOCKS	WNRG723	7/10/92
DC	WASHINGTON		9/27/93
		WPDM326	5/4/93
			7/2/93
		WFDE632	7/6/93
DE	WILMINGTON	WPCZ741	5/4/93
FL	BONAVENTURE	WPCY870	4/22/93
	BONITA SPRINGS	WPDJ455	7/30/93
	BRADENTON	WPCY869	4/22/93
	DELRAY BEACH		10/16/92
	FORT LAUDERDALE		1/28/93
	FORT MEYERS	WPCZ738	4/28/93
	GAINESVILLE		1/28/93
			10/16/92
	HALEAH		10/2/92
	HOLLY HILL	WPCY872	4/22/93
	HOLLYWOOD		10/16/92
	HOMESTEAD	WPDM292	4/22/93
	JACKSONVILLE		10/16/92
	JUPITER	WPDM292	4/22/93
	KENDALL	WPDM292	4/22/93
	KEY WEST	WPDM292	4/22/93
	KISSIMMEE	WPCY872	4/22/93
	LAKE BUENA VISTA		10/9/92
	LAKELAND	WPCY869	4/22/93
	LONGWOOD		10/9/92
		WPCY870	4/22/93
	MELBOURNE		10/9/92
	MIAMI		10/2/92
	NAPLES	WPCZ738	4/28/93

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FL	ORLANDO		10/9/92 10/9/92
	PENSACOLA	WPCP937	4/5/93
	PINELLAS PARK		8/7/92
	POMPANO BEACH		10/16/92
	SARASOTA	WPCY869	4/22/93
	TALLAHASSEE		10/16/92
	TAMPA		8/7/92
	TITUSVILLE	WPCY872	4/22/93
	WEST PALM BEACH		10/16/92
GA	ALPHARETTA	WPCY871	4/22/93
	ATHENS		8/7/92
	ATLANTA		9/21/92 9/21/92 9/21/92
	AUGUSTA		8/25/92
	BRUNSWICK	WPCY868	8/16/93
	CANTON		8/7/92
	CARROLTON	WPCY868	8/16/93
	CARTERSVILLE	WPCY868	8/16/93
	CLARKSTON		9/17/92
	COLUMBUS		8/7/92
	CONYERS		9/17/92
	DOUGLASVILLE		8/7/92
	DULUTH		9/21/92
	EAST POINT	WPCY868	8/16/93
	FAYETTEVILLE		9/17/92
	GAINESVILLE		8/7/92
	GRIFFIN		5/4/93
	HIGGSTON		8/7/92

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GA	JONESBORO		9/21/92
	LEESBURG	WPBF649	9/16/92
	MACON		8/7/92
	MARIETTA		9/17/92
	MCDONOUGH		8/7/92
	NEWNAN		10/15/92
	PANTHERSVILLE	WPBF649	3/10/93
	ROME		8/7/92
	ROSWELL		9/17/92
	SAVANNAH		8/7/92
	SNELLVILLE		8/7/92
	SUGAR HILL		5/4/93
	THOMASVILLE	WPBF649	3/10/93
	UNION CITY	WPCY871	4/22/93
	VALDOSTA	WPBF649	9/16/92
HI	EWA BEACH		10/15/93
	HONOLULU		10/15/93 10/15/93
	KANEHOE		10/15/93
	KEOKEA KULA		10/15/93
	LAHAINA		10/15/93
IA	CEDAR RAPIDS	WPCY878	4/22/93
	DES MOINES	WPCY876	4/22/93
	RETTENDORF	WPCY878	4/22/93
ID	BOISE		3/8/93
IL	AURORA		8/24/92
	BELVIDERE	WPDK622	8/27/93
	BOLLINGBROOK		8/24/92
	CHICAGO		11/2/92