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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

ORIGINAL

In the Matter of	)	
	)	
Amendment of Section 76.51 of the Commission's Rules to Include Decatur, Texas in the Dallas-Fort Worth, Texas Television Market	)	CS Docket No. 94-42

To: Chief, Cable Services Bureau

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OFFICE OF SECRETARY

REPLY COMMENTS

Texoma Broadcasting Corp.
KSWO Television Co., Inc.
James Cable Partners
Brissette TV of Wichita Falls, Inc.
BSP Broadcasting, Inc.

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August 8, 1994

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SUMMARY

The Commission should deny the request of Word of God Fellowship, Inc. ("WOGF"), licensee of KMPX-TV, Decatur, Texas ("KMPX"), to add Decatur, Texas as a designated community in the Dallas-Ft. Worth, Texas television market. WOGF's Comments in this proceeding serve only to reinforce the fact that WOGF has abandoned its community of license while attempting to align itself with the much larger cities of Dallas and Ft. Worth. Measurements of the station's signal coverage in Decatur, made in accordance with Commission's Rules, demonstrate that KMPX does not provide a city grade signal over most of Decatur. KMPX therefore fails to satisfy one of the basic requirements upon which the Commission relies to presume that a station provides adequate service to its licensed community. Furthermore, KMPX's transmitter site is located some 50 miles from Decatur and its main studio is located between Dallas and Ft. Worth. The Commission should not countenance WOGF's abandonment of its community, much less reward it by agreeing to redesignate the Dallas-Ft. Worth market to include Decatur.

Moreover, nothing in WOGF's Comments alters the Commission's initial perception that WOGF's rule making petition presented only a "minimal case for redesignation of the subject market." WOGF apparently believes that by presenting only a collection of generalizations, unsupported allegations, hearsay, and truisms concerning the relationships between Decatur and Dallas-Ft. Worth, it can persuade the Commission to amend the Dallas-Ft. Worth market name. However, as the Commission explained in the NPRM, WOGF must

demonstrate "that sufficient commonality exists between Decatur and the other communities that comprise the market."

WOGF has provided the Commission with little useful information to justify its assertions that the commonalities between Decatur and the cities of Dallas and Ft. Worth are adequate to justify amending the market name. Decatur is in fact an independent community, situated approximately an hour's drive from Ft. Worth and an hour and a half drive from Dallas that has its own independent identity and economic base.

The fact that Decatur residents rely on the electronic media from nearby markets, including the Dallas-Ft. Worth market, for their news and information is largely due to the fact that KMPX, the only radio or television station licensed to Decatur, has ignored and directed its signal and its marketing efforts toward Dallas and Ft. Worth. Furthermore, if the ties between Decatur and the Dallas-Ft. Worth media markets were as strong as WOGF suggests, viewership of at least one of these nine Dallas-Ft. Worth market commercial television stations commencing operations since 1972 would have achieved significant viewership levels in Decatur.

If the Commission has sympathy for KMPX, it should explore other alternatives that do not harm adjacent, smaller market television stations or rural cable systems, such as encouraging WOGF either to seek a determination that KMPX is significantly viewed or to re-file its request to change the KMPX community of license to Plano, Texas or another community receiving city grade service from KMPX.

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To: Chief, Cable Services Bureau

REPLY COMMENTS

Texoma Broadcasting Corp., licensee of KFDX-TV, Wichita Falls, Texas ("KFDX"); KSWO Television Co., Inc., licensee of KSWO-TV, Lawton, Oklahoma, ("KSWO"); James Cable Partners ("James"); Brissette TV of Wichita Falls, Inc., licensee of KAUZ-TV, Wichita Falls, Texas ("KAUZ"); and BSP Broadcasting, Inc., licensee of KJTL(TV), Wichita Falls, Texas ("KJTL") (collectively, the "Joint Reply Commenters"), by their attorneys, herein file their reply comments in the above-captioned proceeding.[1/]

Joint Reply Commenters' initial comments in this proceeding[2/] urged the Commission to deny the request of WOGF, licensee of KMPX-

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[1/] These Reply Comments are timely filed pursuant to a "Consent Motion for Extension of Time" filed by Word of God Fellowship, Inc. ("WOGF") on July 19, 1994. That Motion sought to extend the filing date for reply comments in this proceeding to August 6, 1994. Since August 6 falls on a Saturday, the applicable filing date is August 8. See 47 C.F.R. § 1.4(j).

[2/] See "Comments" filed by Texoma Broadcasting Corp.; KSWO Television Co., Inc.; Brissette TV of Wichita Falls, Inc.; and BSP Broadcasting, Inc., on July 7, 1994 (the "Joint Comments") and "Comments of James Cable Partners" filed July 7, 1994 (the "James Comments").

TV, Decatur, Texas ("KMPX"), to add Decatur, Texas as a designated community in the Dallas-Ft. Worth television market, since this request represents only the latest step in WOGF's efforts to align KMPX with the cities of Dallas and Ft. Worth and abandon Decatur, Texas, the station's community of license. The Joint Comments explained that any difficulties WOGF has encountered and costs it has incurred because KMPX must compete with stations in the Dallas-Ft. Worth market are problems of WOGF's own making, since WOGF chose to locate the KMPX transmitter in Dallas and direct its service to Dallas and Fort Worth rather than Decatur. Moreover, as discussed in the Joint Comments, the Commission should not view WOGF's proposal in a vacuum, without considering the harm that modifying the Dallas-Ft. Worth market name would have on the adjacent, and much smaller, Wichita Falls, Texas-Lawton, Oklahoma television market or, as discussed in the James Comments, the impact on rural cable systems operating outside of the current Dallas-Ft. Worth market. Both the Joint Comments and the James Comments suggest that a better alternative to WOGF's proposal in this proceeding, and one more likely to achieve WOGF's stated goals, would be for KMPX to seek a determination that it is "significantly viewed" in the areas where KMPX currently receives, or seeks to receive, cable carriage.[3/]

[3/] See Joint Comments at 10-14; James Comments at 4.

WOGF's Comments in this proceeding[4] serve only to reinforce the irrefutable fact that, by choosing to locate the KMPX transmitter in Dallas, WOGF has abandoned its community of license while doing all that it can to align itself with the much larger cities of Dallas and Ft. Worth. Moreover, nothing in WOGF's Comments alters the Commission's initial perception that WOGF's rule making petition presented only a "minimal case for redesignation of the subject market."[5] Since no persuasive showing has been presented for amending the name of the Dallas-Ft. Worth market to include Decatur, the Commission should decline to amend the rules in this manner.

I. KMPX HAS ABANDONED ITS COMMUNITY OF LICENSE.

In the NPRM, the Commission raised significant questions arising from the unique situation whereby KMPX and the Dallas-Ft. Worth stations serve common areas. This situation exists solely because the KMPX transmitter site is located in Dallas, some 50 miles from Decatur, a location from which KMPX does not provide a predicted Grade B service to its community of license. WOGF attempts to respond to some of the Commission's concerns by providing a coverage map with its Comments showing that 13 of the 16 Dallas-Ft. Worth stations provide predicted Grade B service to Decatur. WOGF asserts that "KMPX places a City Grade signal over

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[4] See WOGF's "Comments," filed on June 14, 1994.

[5] "Notice of Proposed Rule Making," 9 FCC Rcd 2252, 2253 (Cable Services Bureau, released May 16, 1994) (the "NPRM").

Decatur utilizing the NBS Tech Note 101 method for determining signal contours."[6]

Before KMPX began broadcasting, the Commission relied on WOGF's NBS Tech Note 101 determination that the station's city grade contour would cover Decatur. That showing constituted the best available evidence of KMPX's coverage at the time. Now that the station has commenced operations, however, the best evidence is no longer a theoretical study, but actual measurements of the station's coverage in Decatur. Attached as Exhibit 1 hereto is the Affidavit of Scott A. Madison, Director of Engineering for James Communications Partners, General Partner of James Cable Partners, L.P., which includes field strength measurements of the KMPX signal in Decatur made in accordance with Section 73.686(c) of the Rules. 47 C.F.R. § 73.686(c). These measurements demonstrate conclusively that KMPX does not provide the minimum required signal over Decatur. Indeed, of the 36 locations at which measurements were taken, the KMPX signal strength satisfied the city grade minimum at only <u>two</u> locations. At the other 34 measurement locations, the signal strength was less than city grade, and at 17 of those locations (50%) the signal strength was no more than Grade B.[7]

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[6] <u>See</u> WOGF Comments, Statement of Marcus Lamb at 2. The statement of Mr. Lamb, WOGF's President, which is attached to WOGF's Comments and contains all of the substance of those Comments, is neither sworn to nor verified. <u>See</u> Sections 1.16 and 1.52 of the Rules. 47 C.F.R. §§ 1.16, 1.52.

[7] Under Sections 73.683(a) and 73.685(a) of the Rules, the minimum signal strength required for KMPX (Channel 29) to provide (continued...)

The Commission expressed concern in the NPRM that no adequate basis may exist to add Decatur to the Dallas-Ft. Worth market, based on the location of the KMPX transmitter site in Dallas.[8] The Commission's concern is wholly justified since, as demonstrated in the Joint Comments, WOGF has in fact abandoned Decatur, KMPX's community of license, for the sole purpose of competing in the Dallas-Ft. Worth market.

The Commission's decision authorizing WOGF to locate the KMPX transmitter in Dallas was based in substantial part on the NBS Tech Note 101 showing that KMPX would meet the basic requirements for providing service to its designated community.[9] However, as the engineering study in Exhibit 1 demonstrates, KMPX fails to satisfy the Section 73.685(a) requirements for such service. City grade coverage is also one of the basic requirements upon which the Commission relies to presume that a station provides adequate service to its licensed community.[10]

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[7] (...continued)
a city grade signal is 80 dBu, a Grade A signal is 74 dBu, and a Grade B signal is 64 dBu. See, 47 C.F.R. §§ 73.683(a), 73.685(a).

[8] NPRM, 9 FCC Rcd at 2253.

[9] See Decatur Telecasting, Inc., 7 FCC Rcd 8622, 8623 (MM Bur. 1992).

[10] See Decatur Telecasting, 7 FCC Rcd at 8623; Suburban Community Policy, Berwick Doctrine and De Facto Reallocation Policy, 93 FCC 2d 436, 456 (1983), recon. denied, 56 RR 2d 835 (1984). A second element for presumptive service to a station's community is programming that serves the community's needs and interests. WOGF has not proven that it provides such programming but, given its stated desire to compete with the Dallas-Ft. Worth stations, it is
(continued...)

The Commission has stated that it will not countenance subversion of its Rules or the Table of Allotments, which are intended to implement Section 307(b) of the Communications Act to provide a "fair, efficient and equitable distribution" of service to communities.[11/] The engineering study submitted in Exhibit 1 hereto demonstrates that KMPX's locating its transmitter and antenna in Dallas has had the effect of subverting those rules. That study, along with the other facts in the record, prove that WOGF has in fact abandoned Decatur, KMPX's community of license, in favor of Dallas-Ft. Worth. KMPX does not provide city grade service to Decatur, its transmitter site is located in Dallas, some 50 miles from Decatur, and its main studio is located in a large suburb between Dallas and Ft. Worth immediately adjacent to Dallas. Evidence indicates that KMPX provides nothing more than Grade B

[10/] (...continued)
questionable whether it does. Although WOGF states that Decatur businesses advertise on Dallas-Ft. Worth media, WOGF has not claimed that KMPX carries any Decatur advertising. See WOGF Comments, Statement of Marcus Lamb at 4.

In Suburban Community Policy, the Commission also said it would rely on a third requirement to presume service to a station's designated community: the location of a station's main studio in the community. The Commission subsequently amended its rules to allow a station's main studio to be located anywhere within a station's city grade contour or in the community of license, if the community is outside the city grade contour. WOGF has, in fact, located the KMPX main studio in Irving, Texas, a large suburb between Dallas and Ft. Worth and adjacent to Dallas, approximately 45 miles from Decatur. See File No. BLCT-930927KF (WOGF's license application listing the KMPX main studio in Irving, Texas).

[11/] See Suburban Community Policy, 93 FCC 2d at 440-441, 456.

service to approximately half of its own community of license.[12] Nothing indicates that KMPX is a Decatur station, rather than a Dallas-Ft. Worth station. The Commission should not countenance WOGF's abandonment of its community, much less reward it by granting WOGF's petition to redesignate the Dallas-Ft. Worth market to include Decatur.

II. WOGF'S COMMENTS FAIL TO JUSTIFY AMENDING THE NAME OF THE DALLAS-FT. WORTH MARKET.

WOGF's Comments in this proceeding represent an ineffective attempt to shore-up the "minimal case" that WOGF has presented to date for amending the name of the Dallas-Ft. Worth market. WOGF apparently believes that by presenting only a collection of generalizations, unsupported allegations, hearsay, and truisms concerning the relationships between Decatur and Dallas-Ft. Worth, it can persuade the Commission to amend the Dallas-Ft. Worth market name. However, as the Commission explained in the NPRM, WOGF must demonstrate "that sufficient commonality exists between Decatur and the other communities that comprise the market."[13] WOGF's vague assertions fail to satisfy this standard.

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[12] See Exhibit 1.

[13] NPRM, 9 FCC Rcd at 2253. See also Implementation of the Cable Television Consumer Protection and Competition Act of 1992 (Broadcast Signal Carriage Issues), 8 FCC Rcd 2965, 2978 (1993) ("We will expect to receive evidence that demonstrates commonality between the proposed community to be added to a market designation and the market as a whole. . . .").

Although WOGF argues in its Comments that the commonalities between Decatur and the cities of Dallas and Ft. Worth are adequate to justify amending the market name, WOGF has provided the Commission with little useful information to justify its assertions.[14] WOGF cites to two "dominant logical reasons" to support its claim of the ties between Decatur and Dallas-Ft. Worth. The first such reason is that Decatur has a "close proximity" to Dallas and Ft. Worth, since Decatur's border is located 28 miles from the closest point in Ft. Worth and 39 miles from the closest point in Dallas.[15] However, a closer analysis demonstrates that this figure has little relevance. Measuring from the center of Decatur to the center of Ft. Worth, which is a more useful measurement of the distance between the cities, shows a distance of nearly 40 miles to Ft. Worth and 56 miles to Dallas. Moreover, since these measurements reflect only air miles, they understate the road distances and travel time that Decatur residents must confront if they are to drive to Dallas or Ft. Worth. Second, WOGF claims that its position is supported by the "huge disparity in population" between Decatur and the cities of Dallas and Ft. Worth.[16] However, because such a disparity exists when comparing the size of any outlying community with the size of the nearest urban center,

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[14] See WOGF Comments, Statement of Marcus Lamb at 2-3.

[15] See WOGF Comments, Statement of Marcus Lamb at 2.

[16] Id. at 2-3.

it is not credible to argue that this fact justifies including Decatur in the Dallas-Ft. Worth market designation.

In a further attempt to buttress its position, WOGF relies upon the results of an "interview" with a Decatur government employee who agrees with WOGF's position.[17] As a threshold matter, the Commission cannot give much credence to such hearsay in Mr. Lamb's statement, which is itself unsworn and unverified. However, even when considered on their face, the employee's comments are vague, imprecise, and provide little information of value to the Commission. Every sentence of the employee's secondhand statement contains generalizations such as what "people" of Decatur do and where "people" of Decatur eat. No attempt is made to define the number of persons who behave in the manner suggested. If WOGF or the government employee had any specific information that might be of use to the Commission in this proceeding, they would surely have presented it by now.[18] Joint Reply Commenters do not deny that some "people" may do as WOGF states; however, since WOGF has not provided the Commission with the specific information requested in the NPRM, the only evidence

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[17] Id. at 3-4.

[18] WOGF presented no such specific information in its first Petition for Rulemaking to amend the market name (see "Petition for Rulemaking" filed by WOGF, May 20, 1993), its second Petition for Rulemaking for that same purpose (see "Petition for Rulemaking" filed by WOGF, September 29, 1993) or its Comments in this proceeding.

available to the Commission is unreliable and general in nature and provides no basis on which to grant a market redesignation.

Despite WOGF's nebulous statements to the contrary, Decatur is in fact an independent community, situated approximately an hour's drive from Ft. Worth and an hour and a half drive from Dallas and that has its own independent identity and economic base. Decatur has its own municipal government, stores, airport, car dealers, newspapers, hospital, funeral home, nursing homes, banks, restaurants, and churches. The Census Department does not consider Decatur a part of the Dallas/Ft. Worth Consolidated Metropolitan Statistical Area, meaning, by definition, that Decatur does not exhibit a high degree of economic and social integration with the Dallas-Ft. Worth area.[19] The local telephone company does not consider Decatur to be part of the Dallas-Ft. Worth area, placing telephone listings for Decatur in a telephone book separate from the books for the Dallas-Ft. Worth metroplex. In short, Decatur exists separate and apart from Dallas and Ft. Worth and Decatur residents rely on Dallas and Ft. Worth to satisfy few of their needs and wants.

As WOGF correctly points out,[20] one connection that exists between Decatur and Dallas-Ft. Worth is that Decatur residents must rely on the electronic media from nearby markets, including the

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[19] 1990 Census of Population and Housing, U.S. Department of Commerce, Texas Volume, p. G-25 and Appendix A, p. A-9.

[20] See WOGF Comments, Statement of Marcus Lamb at 4, 7.

Dallas-Ft. Worth market, for their news and information. However, this situation is largely one of WOGF's own making since KMPX, the only radio or television station licensed to Decatur, has chosen to locate its transmitter in Dallas, its studio adjacent to Dallas, and, as discussed above,[21] fails to provide city grade service throughout its own community of license. Decatur's development as a media market has been severely restricted because WOGF has chosen to ignore the city and to direct its signal and its marketing efforts toward Dallas and Ft. Worth. WOGF should not now be heard to argue that including Decatur in the Dallas-Ft. Worth market name can be justified on facts such as that Decatur businesses advertise on Dallas-Ft. Worth stations, since WOGF's failure to serve Decatur has contributed to that very result.[22]

However, Decatur's ties to the Dallas-Ft. Worth television market are not as strong as WOGF suggests. WOGF's assertion that "most of the DFW stations have significantly viewed status in Decatur,"[23] is flatly wrong. In fact only five of the 14 commercial television stations licensed to Dallas, Ft. Worth and nearby

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[21] See Section I, supra.

[22] Moreover, it is irrelevant for WOGF to assert that KDZR-FM considers itself to be a Dallas-Ft. Worth station, even though that station's transmitter is located in Decatur. See Statement of Marcus Lamb at 4. First, such a statement is more unsupported hearsay. Moreover, since KDZR-FM is licensed to Denton, Texas, that station has no obligation to serve the needs and interests of Decatur, unlike KMPX which is licensed to Decatur, yet has chosen to abandon its community in favor of the Dallas-Ft. Worth area.

[23] See WOGF Comments, Statement of Marcus Lamb at 4.

communities are considered significantly viewed in Decatur.[24] Moreover, each of these five significantly viewed stations has held that status since 1972, when the Commission released its initial significant viewership list.[25] In the succeeding 22 years, not a single Dallas or Ft. Worth station has been found to be significantly viewed in Decatur or Wise County, despite the fact that nine new commercial television stations (excluding KMPX) have begun operating in the Dallas-Ft. Worth area since that time. If the ties between Decatur and the Dallas-Ft. Worth media markets were as strong as WOGF suggests, viewership of at least one of these other nine stations would certainly have achieved significant viewership levels in Decatur since 1972.[26]

III. CONCLUSION.

Accordingly, for the reasons stated above and in the Joint Comments filed by Texoma Broadcasting Corp.; KSWO Television Co., Inc.; Brissette TV of Wichita Falls, Inc.; and BSP Broadcasting, Inc. and the "Comments of James Cable Partners" in this proceeding, the Commission should DENY the request of Word of God Fellowship,

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[24] See Cable & Station Coverage Atlas, 1994 ed., at 124; Broadcasting and Cable Yearbook, 1994 ed., at C-141.

[25] See Memorandum Opinion and Order on Reconsideration of Cable Television Report and Order, 36 F.C.C.2d 326, Appendix B (1972).

[26] The fact that not a single Dallas-Ft. Worth market television station commented in this proceeding, while four Lawton-Wichita Falls market stations participated in comments, further demonstrates the lack of connection between Decatur and stations in the Dallas-Ft. Worth market.

Inc. to include Decatur, Texas in the Dallas-Ft. Worth, Texas television market. Instead, if the Commission has sympathy for the self-created plight of KMPX, the Commission should explore other alternatives that do not adversely affect adjacent, smaller market television stations or rural cable systems, such as encouraging WOGF either to seek a determination that KMPX is significantly viewed in the areas where it desires cable carriage or to re-file its request to change the KMPX community of license to Plano, Texas or some other community receiving city grade service from KMPX.

Respectfully submitted,

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Attorney for BSP Broadcasting,
Inc.

August 8, 1994

EXHIBIT 1

Affidavit of Scott A. Madison
Director of Engineering, James Communications Partners

Attachment 1
Attachment 2
Attachment 3
Attachment 4
Attachment 5
Attachment 6

AFFIDAVIT

State of Michigan)
) SS:
County of Oakland)

Scott A. Madison, being duly sworn, hereby deposes and says:

1. I am Director of Engineering for James Communications Partners, General Partner for James Cable Partners, L.P. ("James") and am responsible for technical compliance of its cable television operations. Prior to joining James, I was Director of Engineering for C4 Media Companies, Inc., (1988-1991), Regional Engineer for C4 Media Cable South I, L.P., (1986-1988), Field Engineer for Regency Cable Products, (1985-1986), and Technical Supervisor for Cablevision Service Company, Inc., (1981-1985). I have been employed in the cable television and communications industries since 1976 and hold a General Class FCC Commercial Radio Telephone License #PG-1-19034. I am familiar with the FCC rules relating to cable television and broadcasting, specifically including Rule §73.686 regarding signal measurements.

2. On July 7, 1994, James filed comments in CS Docket No. 94-42 relating to the possible revision of Rule §76.51 to include Decatur, Texas, in the Dallas-Fort Worth television market. James opposed this proposal because of the unfair consequences it would have on the operations of its cable television systems within the Decatur 35-mile zone. As part of its opposition, James asserted that KMPX, the Decatur television station seeking the rule change, does not serve Decatur itself with its television signal.

3. In order to test this assertion, I asked Dale Howard, the Plant Supervisor for James' Decatur, Texas system to conduct measurements in Decatur of the signal strength

of KMPX. These measurements were conducted under my supervision on July 22, 1994, in accordance with the procedures specified in FCC Rule §73.686. Specifically, a grid of horizontal and vertical lines encompassing the City of Decatur (1990 census population of 4252) were drawn on a topographical map. The 16 resulting intersection points comply with the number of points required by Rule §73.686(c). (An enlarged copy of this map is included as Attachment 1 to this affidavit). At each intersection point, measurements were taken using a 1/2λ reference dipole mounted at the 30 foot level of a pole, 40 feet of RG/6 coax, a Trilithic TriCorder field strength meter (Serial No. 105401, purchased November 3, 1993, and last calibrated on that date to an accuracy of ± .75dB at 30-110 degrees F). Those measurements are shown on Attachment 2 to this affidavit.

4. Additionally, in accordance with Rule §73.686(c)(2)(iii) four cluster measurements were taken at four of the grid intersection points. At each cluster, five radials of 200 feet were marked off, and signal measurements taken at each of the five end points. (See Attachments 3 through 6 to this affidavit).

In witness whereof, I am

Scott A. Madison

Susan L. Clem

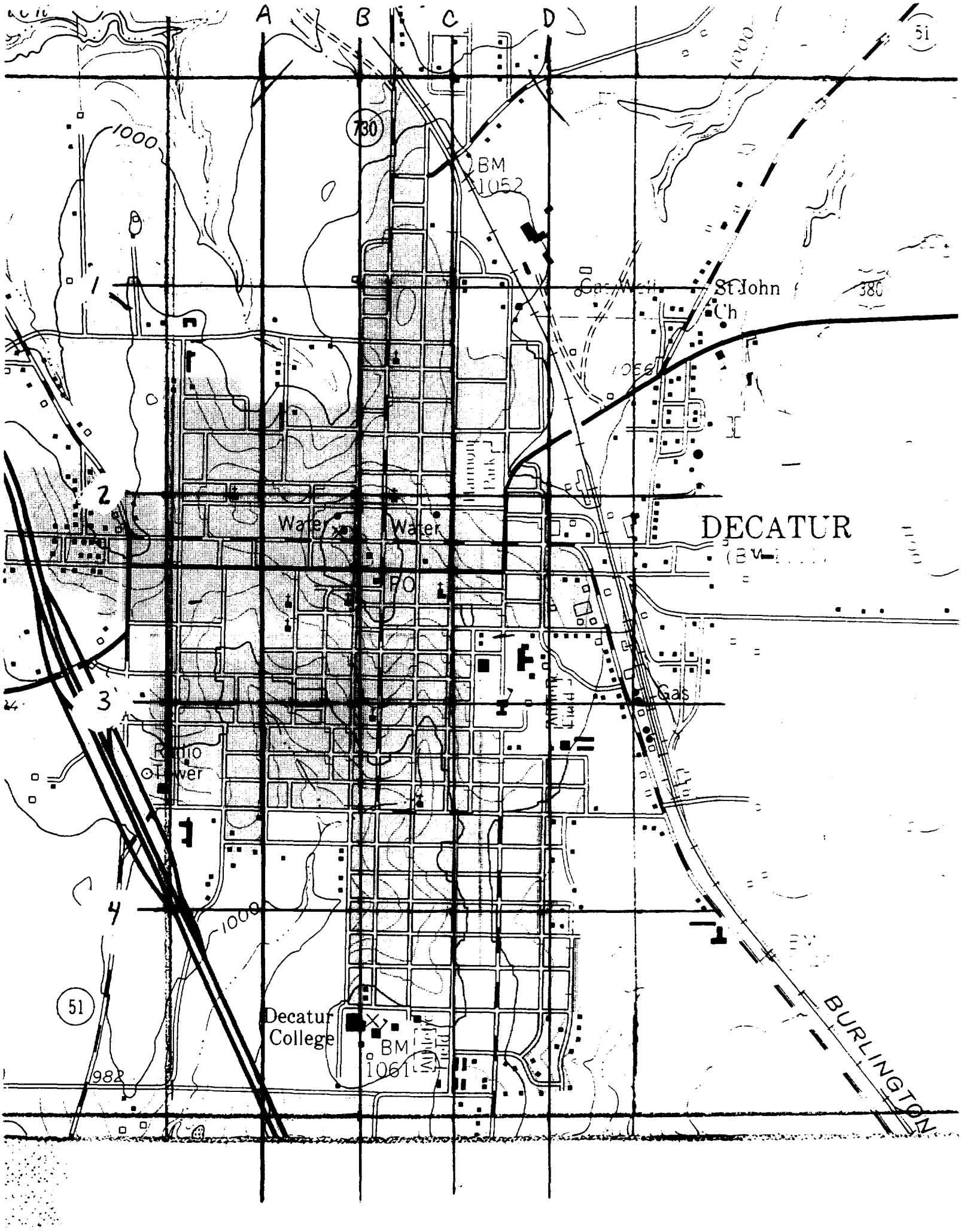
Subscribed and sworn to before me
this 5 day of August, 1994

SUSAN L. CLEM
NOTARY PUBLIC - MACOMB COUNTY, MICH.
MY COMMISSION EXPIRES 08-27-96

Acting in Oakland County, Michigan

My commission expires:

Attachment 1



DECATUR SIGNAL SURVEY

DATE: 07/22/94

TEST EQUIPMENT USED

1. FIELD STRENGTH METER: Trilithic Tricorder, serial number 105401.
   The accuracy of this meter is plus or minus .75 dB AT 25 degrees centigrade and plus or minus 2 dB across the temperature range.

2. ANTENNA: Half Wave Dipole cut for channel 29, 561.250 MHz.

3. TEST CABLE: RG6 Coaxial Cable eighteen feet long with loss of 1 dB.

TEST PROCEDURE

Sixteen locations were established by drawing four lines East to West then North to South. The test location being at the intersection of these lines. The North to South lines were labled A, B, C, D, the East to West lines were labled 1, 2, 3, 4, . The test locations number then would be A1, A2, ETC., (SEE PAGE 2)

At each location we raised the antenna to a level thirty feet above the ground. The antenna was orientation until the strongest signal level was measured, this reading was recorded and the direction checked with a compass.

At four of the test locations we made an additional five spot measurements with in a 200 foot radius. These readings were then recorded. (SEE PAGE 3)

At each test location the time, temperature and any obstruction located in the signal path was noted.

The signal level logged was determined by taking the signal level reading at the test site and adding to it the test cable loss in dBmV.

GRADE B MEASUREMENT DATA

ALL SIGNAL LEVEL READINGS IN dBmV.

DATE 07/22/94

TEST LOCATION	TIME	TEMP.	READING	NOTES
A1:	11:54 AM	88	-19.4	
A2:	12:00	89	-6.4	
A3:	1:58 PM	89	-17.5	Large trees in path 50 feet high 100 foot from Test Antenna.
A4:	3:02 PM	94	-15.1	Large building in path 4 blocks from test Antenna.
B1:	10:45 AM	87	-7.48	
B2:	12:07 PM	89	-5.2	Power Lines in path 50 feet from Test Antenna
B3:	1.39 PM	90	-11.8	Large Church building in path 75 feet from Test Antenna.
B4:	2:51 PM	93	-17.4	
C1:	11:00 AM	87	-11.8	
C2:	12:13 PM	89	-5.2	
C3:	2:09 PM	93	-3.8	
C4:	2:30 PM	93	-11.2	
D1:	11:30 AM	88	-8.8	
D2:	12:36 PM	89	-15.1	
D3:	2:08 PM	93	+5.3	
D4:	2:40 PM	93	-10.4	

CLUSTER MEASUREMENT

FOUR TEST LOCATIONS WERE SELECTED FOR THE CLUSTER MEASUREMENTS IN LIEU OF MOBILE RUNS.

THE SIGNAL LEVEL READINGS ARE IN dBmV.

TEST LOCATION:

B1: -18.4, -8.9, -14.9, -8.9, AND -11.9 WAS MEASURED AT FIVE SPOTS WITH IN 200 FEET OF B1.

B3: -3.2, -4.1, +.8, -10.4, AND -14.4 WAS MEASURED AT FIVE SPOTS WITH IN 200 FEET OF B3.

C2: -3.2, -6.5, -6.2, -3.8, AND -3.2 WAS MEASURED AT FIVE SPOTS WITH IN 200 FEET OF C2.

D4: -5.2, -10.4, -7.4, -8.1, AND -5.6 WAS MEASURED AT FIVE SPOTS WITH IN 200 FEET OF D4.