

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

RECEIVED

NOV 25 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Section 783.202(b))
Table of Allotments,)
FM Broadcast Stations.)
(Cape Girardeau and)
Chaffee, Missouri, and)
Union City, Tennessee))
)

MM Docket No. 94-~~103~~
113
RM-8514

To: Chief, Mass Media Bureau

COUNTERPROPOSAL

Twin States Broadcasting, Inc. ("Twin States"), by its attorneys, hereby submits its Counterproposal in the above-captioned proceeding, stating as follows:

In its Notice of Proposed Rule Making, DA94-1050, released October 3, 1994 ("NPRM"), the Mass Media Bureau proposed to allot Channel 230A to Cape Girardeau, Missouri, as requested in a "Petition for Rule Making" filed on August 31, 1994, by Kevin G. Greaser ("Greaser"). That request directly conflicts and is mutually-exclusive with the earlier filed petition by Twin States to upgrade the Channel of its Station WKWT(FM), Union City, Tennessee, from 285A to 284C2 and to substitute Channel 230A for Channel 284A at Chaffee, Missouri. A copy of the "Petition for Rule Making and Order to Show Cause" filed by Twin States on

No. of Copies rec'd
List A B C D E

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August 5, 1994, attached hereto as Attachment A and incorporated by reference, therefore must be considered as a counterproposal pursuant to Paragraph 3(b) of the Appendix to the NPRM.¹

Upon consideration of the conflicting proposals, the Bureau must conclude that the amendment to the Table of Allotments proposed by Twin States should be adopted pursuant to the allotment priorities set forth in Revision of FM Policies, 90 FCC 2d 88(1982), as follows:

- (1) first full-time aural service;
- (2) second full-time aural service;
- (3) first local service; and
- (4) other public interest matters.

(Co-equal weight given to priorities (2) and (3).)

As shown by the Engineering Statement (Attachment B) prepared by Bromo Communications, Inc., Twin States' consulting engineer, neither proposal would provide a first or second full-time aural service to any area, nor would either proposal create a first local service.² As also shown by the Engineering Statement, however, the Twin States proposal is preferred under

¹ It is noted that a typographic error appears on page one of the Petition, identifying the Twin States facility as "KWKT(FM)". The station call sign is correctly stated throughout the remainder of the Petition.

² The Greaser proposal, if implemented, would provide a fifth full-time local service at Cape Girardeau, which presently is served by Stations KZIM(AM), KRCU(FM), KGMO(FM) AND KEZS-FM. The community also is served by Stations KAPE(AM) and KCGQ(AM), which operate with full power during daytime hours and with limited power during night-time hours.

the fourth criterion, "other public service matters".

Specifically, the Engineering Statement shows that the Twin States proposal provides more service to underserved areas and serves a greater overall population, as well. Thus, as demonstrated by the Engineering Statement (which compares the WKWT(FM) gain area and the Greaser service area), Twin States would provide 543 persons with a third aural reception service, 8,691 persons with a fourth aural reception service, and 11,936 persons with a fifth aural reception service. In contrast, Greaser would provide, at best, a sixth service to 816 persons (while Twin States would provide 19,531 persons with such service).³ Furthermore, 108,508 persons reside in the Twin States gain area as a whole, while only 81,586 persons reside in Greaser's proposed service area. Twin States therefore will provide a new service to 26,922 more persons than would Greaser. The Twin States gain area also is greater than the Greaser gain area.

In sum, therefore, the Twin States proposal would provide a new reception service to more underserved areas and populations and to a greater area and population in general. Accordingly, it

³ While of diminished importance in these circumstances, Twin States would provide 19,531 persons with a seventh reception service, whereas Greaser would provide such service to only 7,343 persons. Twin States also would provide 17,361 persons with an eighth service, while Greaser would provide such service to only 9,790 persons.

is respectfully submitted that the Commission should amend its Table of Allotments as proposed by Twin States herein and in its August 5, 1994 "Petition for Rule Making and Order to Show Cause", as follows:

	<u>Present</u>	<u>Proposed</u>
Union City, TN	285A, 289A	284C2, 289A
Chaffee, MO	284A	230A

A certification by the President of Twin States, confirming that Twin States will promptly apply for a permit to operate WKWT(FM) on the upgraded Channel, will promptly construct such facilities once its application is granted and will reimburse the licensee of Station KYRX(FM), Chaffee, Missouri, for the reasonable expenses it will incur in connection with the substitution of its Channel is appended hereto as Attachment C.⁴

Respectfully submitted,
TWIN STATES BROADCASTING

By:


Eric S. Kravetz
Brown, Nietert & Kaufman,
Chartered
1920 N St., N.W., #660
Washington, DC 20036
(202) 887-0600

Its Attorneys

November 25, 1994

⁴ The Attached Engineering Statement and certification are facsimiles of the original executed documents. The originals will be submitted immediately upon receipt.

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

In the Matter of)
)
 Amendment of Section 73.202(b))
 Table of Allotments) RM-
 FM Broadcast Channels)
 Union City, Tennessee and)
 Chaffee, Missouri)

To: Chief, Mass Media Bureau

RECEIVED

AUG 5 1994

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

**PETITION FOR RULE MAKING
 AND ORDER TO SHOW CAUSE**

Twin States Broadcasting, Inc. ("Twin States"), by its attorneys, hereby submits its Petition for Rule Making and Order to Show Cause, requesting that the Commission amend Section 73.202(b) of its Rules, to upgrade FM Channel 285A to Channel 284C2 at Union City, Tennessee, and to substitute Channel 230A for Channel 284A at Chaffee, Missouri, as follows:

	<u>Present</u>	<u>Proposed</u>
Union City, TN	285A, 289A	284C2, 289A
Chaffee, MO	284A	230A

Twin States further requests that its license to operate Station KWKT(FM), Union City, Tennessee, be modified to specify operation on Channel 284C2. In support thereof, the following is stated:

Twin States is licensee of Class A FM Station WKWT(FM), Union City, Tennessee, which operates on Channel 285A. It wishes to upgrade that facility to operate on first adjacent Channel 284C2 at Union City, in order to serve a greater area and population and to utilize its frequency more efficiently. As shown in the Technical Exhibit attached as Attachment A hereto, this proposal is fully consistent with the Commission's Rules, except that the upgraded station would be short-spaced to Station KYRX(FM), Chaffee, Missouri, which presently operates on Cochannel 284A. This limitation would be eliminated, however, if Station KYRX(FM) were to instead operate at its current transmitter site on Channel 230A.

Twin States represents that it will promptly file an application to operate Station WKWT(FM) on Channel 284C2 once the Commission assigns that channel to Union City, Tennessee, and modifies the WKWT(FM) license to specify operation on that channel. Twin States further represents that it will promptly construct and operate that improved station upon grant of such application. Twin States also agrees that it will reimburse Station KYRX(FM) for the reasonable and prudent expenses incurred as a consequence of the change in its operating frequency, pursuant to Circleville and Columbus, Ohio, 8 FCC 2d 159 (1967).

In view of the foregoing, it is respectfully requested that the Commission issue a Notice of Proposed Rule Making and Order to Show Cause, proposing the amendment of Section 73.202(b) as set forth herein, modifying the WKWT(FM) license to specify operation on Channel 284C2 and requiring the licensee of Station KYRX(FM) to show cause why its operating frequency should not be modified from Channel 284A to Channel 230A as proposed herein.¹

Respectfully submitted

TWIN STATES BROADCASTING, INC.

By:


Eric S. Kravetz
Brown, Nietert & Kaufman
1920 N Street, N.W.
Suite 660
Washington, D.C. 20036
(202) 887-0600

Its Attorneys

Dated: August 5, 1994

¹ Twin States also is licensee of Station WWUC(FM), Union City, Tennessee. As shown in the Technical Exhibit attached as Attachment B hereto, operation of WWUC(FM) and the upgraded WKWT(FM) will not contravene the Commission's multiple ownership rules.

REQUESTED RULE MAKING
TWIN STATES BROADCASTING
CHANNEL 284 - CLASS C2
UNION CITY, TENNESSEE
JULY 1994

Technical Exhibit
TE-1

BROMO
COMMUNICATIONS, INC.
P. O. Box 1588
Clayton, Georgia 30525-1588
(706) 782-7222

REQUESTED RULE MAKING
TWIN STATES BROADCASTING
CHANNEL 284 - CLASS C2
UNION CITY, TENNESSEE
JULY 1994

This requested Rule Making is being filed on behalf of Twin States Broadcasting ("Twin States"), licensee of radio station WKWT, Union City, Tennessee. WKWT presently operates on Channel 285A with 3 kW effective radiated power from 91 meters height above average terrain¹. Through this Rule Making, Twin States is requesting WKWT be ordered from Channel 285A to Channel 284C2 and the deletion of 285A.

All allocation requirements of §73.207 are met or exceeded by this Twin States requested Rule Making with one exception. Exhibit #1 is the allocation study showing all of the criteria being met. The exception is spacing to KYRX, Chaffee, Missouri. §73.207 requires co-channel Class A and Class C2 stations to be 166 kilometers removed. Because this instant proposal would only allow 99.72 kilometers to KYRX, we then endeavor to find a new channel KYRX could be ordered to at its current licensed site. Exhibit #2 illustrates that Channel 230A clears all allocation restraints at the current KYRX site.² Channel 230 is one of the two IF (Intermediate Frequency) taboos of the current KYRX on Channel 284A. Therefore, Channel 230 is presently being precluded from use by any other party by KYRX.

¹ WKWT additionally has a construction permit to operate with 6 kW at 87 meters height above average terrain from this same licensed site.

² KYRX is located at North Latitude 37° 09' 27" and West Longitude 89° 36' 20".

Exhibit #3 illustrates the Channel 284 C2 Usable Area for WKWT. The typical Class C2 city grade extends 32.5 kilometers. From the hypothetical reference site of 36° 27' 21" North Latitude and 88° 54' 27" West Longitude, the most distant Union City city limit is approximately 15 kilometers away. Therefore the entire city of Union City is served by the 70 dBu city grade signal of this proposal. Also please note from Exhibit #3 there are many, many areas where the proposed C2 supporting structure could be located. Although it is desirable to build a supporting structure that would support a center of radiation of 150 meters height above average terrain, the usable area is so close to Union City that a minimum structure could be built and still serve Union City with the city grade contours.

When Twin States is ordered to Channel 284C2 Federal Communications Commission Form 301 will be filed on a timely basis. Additionally, Twin States will reimburse Chartres Media, Inc., licensee of KYRX, Chaffee, Missouri for their reasonable expenses to change frequency to Channel 230A.

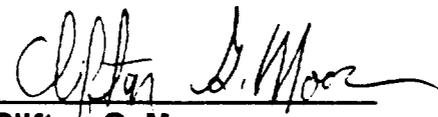
Twin States wishes to point out public interest aspects of this proposal. The proposed 60 dBu contour of Channel 284C2 100% encompasses the present Class A Construction Permit and licensed 60 dBu contour of Twin States on Channel 285A. Based on the 1990 Census the present Class A Construction Permit serves 54,518 persons in 2,237.9 square kilometers of area. The Class C2 station similarly serves 153,825 person in 8,545 square kilometers. This proposal has a gain area of 6,307.1 square kilometers and a population gain of

99,307 persons. This is also expressed as a 73.9% area gain and a 64.6% population gain.

In conclusion, it is requested that the following changes of \$73.202 be made to reflect the following:

	<u>PRESENT</u>	<u>PROPOSED</u>
Union City, Tennessee	285A, 289A	284C2, 289A
Chaffee, Missouri	284A	230A

All of the information contained herein is true and correct to the best of our knowledge and belief. All data relating to authorized, applied or proposed (FM Stations) was extracted from the NTIA database and updated on June 27, 1994. We assume no liability for omissions or errors in that database. Should any questions arise during consideration of this proposal, we would welcome the opportunity to discuss the matter by telephone at (706) 782.7222.


Clifton G. Moor

Bromo Communications, Inc.

Class C2 Upgrade
WKWT Radio Station

REFERENCE
36 27 21 N
88 54 27 W

CLASS C2
Current rules spacings
CHANNEL 284 -104.7 MHz

DISPLAY DATES
DATA 06-27-94
SEARCH 07-15-94

CALL TYPE	CH# LAT	CITY LNG	STATE	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WKWT.C	285A	Union City	TN	301.0	3.93	106.0	-102.07 *
CPM CN	36 28 27	88 56 42		6.000 kW	87M	2.4 65.9	
		Reelfoot Broadcasting, Inc.				BMPH920331IG	
WKWT	285A	Union City	TN	301.0	3.93	106.0	-102.07 *
LI CN	36 28 27	88 56 42		3.000 kW	91M	2.4 65.9	
		Reelfoot Broadcasting, Inc.				BLH6413	
KYMOFM	287A	East Prairie	MO	313.4	55.10	55.0	0.10 <
LI CN	36 47 49	89 21 19		3.000 kW	63M	34.2 34.2	
		Usher Broadcasting Company				BLH910709KB	
WRVRFM	283C1	Memphis	TN	209.8	166.37	158.0	8.37
LI CN	35 09 17	89 49 20		100.000 kW	229M	103.4 98.2	
		Keymarket Communications				BLH6379	
WTNV	281C1	Jackson	TN	175.7	90.11	79.0	11.11
LI DEN	35 38 46	88 49 57		100.000 kW	201M	56.0 49.1	
		Currey Broadcasting Corporati				BLH7816	
WLSZ	287A	Humboldt	TN	179.6	67.82	55.0	12.82
LI CN	35 50 41	88 54 08		3.000 kW	100M	42.2 34.2	
		Boyd Enterprises, Inc.				BLH890126KA	
WAVJ	285A	Princeton	KY	51.8	119.18	106.0	13.18
LI CN	37 07 14	87 51 31		6.000 kW	53M	74.1 65.9	
		The Princeton Broadcasting Co				BLH4354	

C2 ALLOCATION STUDY

THIS STUDY ASSUMES KYRX, CHAFFEE, MO IS RELOCATED TO CHANNEL 230A.

EXHIBIT #1

REQUESTED RULE MAKING
TWIN STATES BROADCASTING
CHANNEL 284 - CLASS C2
UNION CITY, TENNESSEE

JULY 1994

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS
St Simons Island, Georgia Washington, D.C.

KYRX Alternate Channel
Chaffee, Missouri

REFERENCE
37 09 27 N
89 36 20 W

CLASS A
Current rules spacings
CHANNEL 230 - 93.9 MHz

DISPLAY DATES
DATA 06-27-94
SEARCH 07-15-19

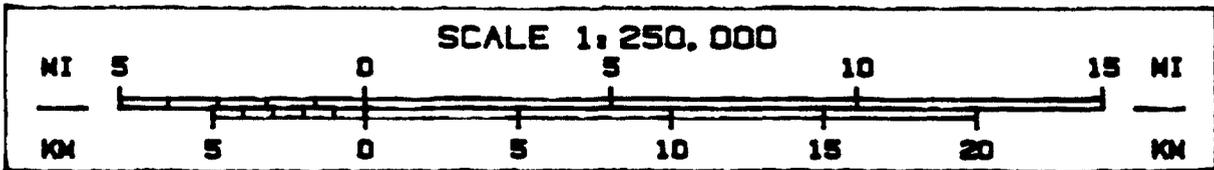
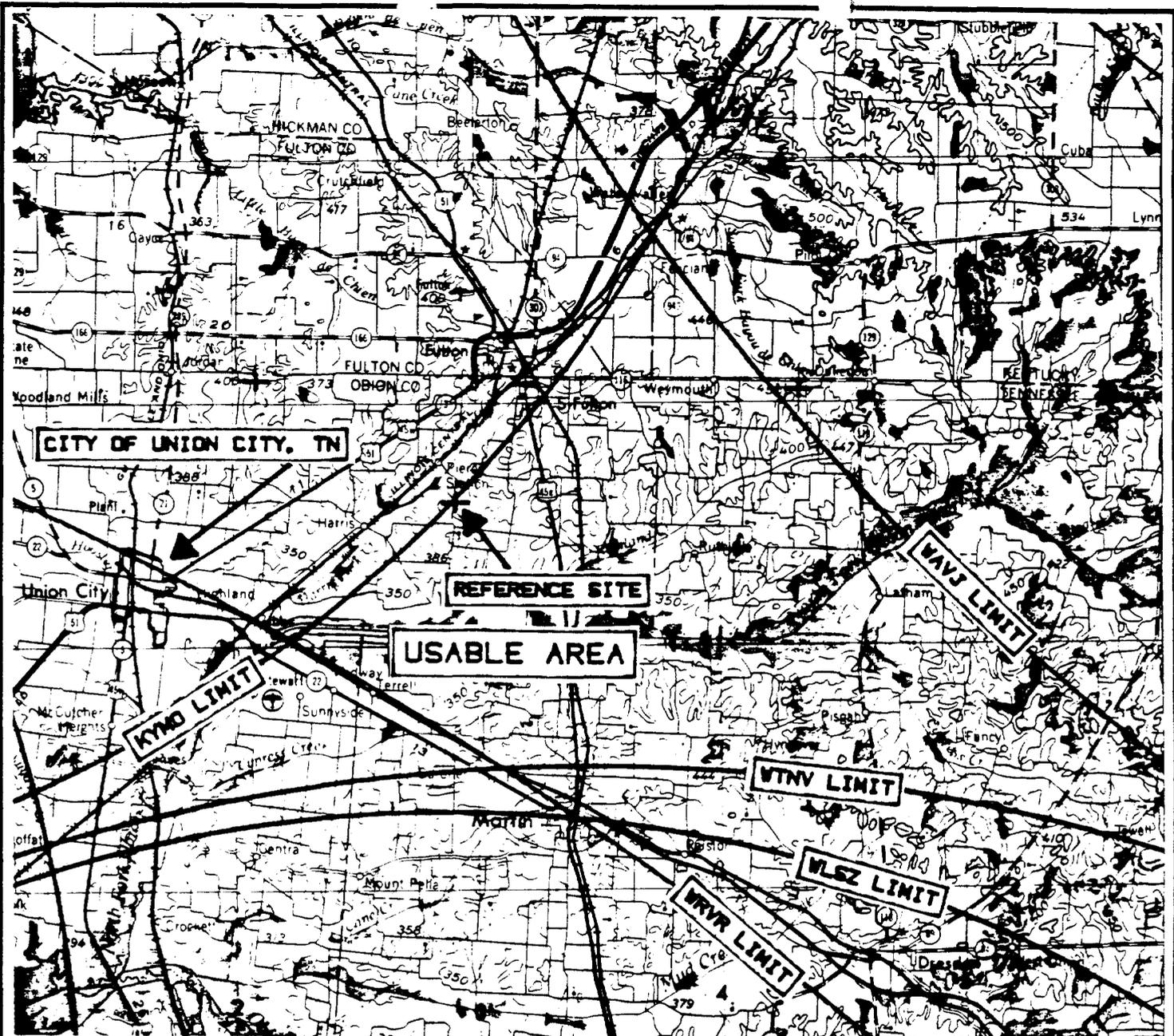
CALL TYPE	CH# LAT	CITY LNG	STATE	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KYRX	284A	Chaffee	MO	0.0	0.00	10.0	-10.00 *
LI CN	37 09 27	89 36 20	6.000 kW	100M	0.0	6.2	
		Chartres Media, Inc.				BLH920611KD	
KSPQ	230C1	West Plains	MO	265.2	205.33	200.0	5.33
LI CN	37 00 12	91 54 24	100.000 kW	198M	127.6	124.3	
		KWPM, Inc.				BLH890201KC	
KKLR	233C1	Poplar Bluff	MO	239.3	85.82	75.0	10.82
LI CN	36 45 46	90 26 03	100.000 kW	246M	53.3	46.6	
		Bluff City Broadcasting, Inc.				BLH890907KC	
WKYQ.C	227C1	Paducah	KY	97.8	88.92	75.0	13.92
CP CN	37 02 56	88 36 52	100.000 kW	279M	55.3	46.6	
		Bristol Broadcasting Company,				BPH901029IE	
WKYQ	227C1	Paducah	KY	100.2	89.68	75.0	14.68
LI CN	37 00 53	88 36 46	89.000 kW	110M	55.7	46.6	
		Bristol Broadcasting Company,				BLH810701AQ	
AP230	230A	Gosnell	AR	190.7	130.79	115.0	15.79
AP CN	35 59 57	89 52 33	6.000 kW	61M	81.3	71.5	
		B and H Broadcasting Company				BPH900928MH	910319
		>Amended 901026					

KYRX ALTERNATE CHANNEL

EXHIBIT #2
REQUESTED RULE MAKING
TWIN STATES BROADCASTING
CHANNEL 284 - CLASS C2
UNION CITY, TENNESSEE

JULY 1994

BROMO
COMMUNICATIONS
BROADCAST TECHNICAL CONSULTANTS
St Simons Island, Georgia Washington, D.C.



C2 USABLE AREA

MAP IS USGS DYERSBURG, TN 250,000 SCALE
 HYPOTHETICAL REFERENCE SITE:
 36 27 21 NORTH LATITUDE
 88 54 27 WEST LONGITUDE

EXHIBIT #3
 REQUESTED RULE MAKING
 TWIN STATES BROADCASTING
 CHANNEL 284 - CLASS C2
 UNION CITY, TENNESSEE

JULY 1994

BROMO BROADCAST
 COMMUNICATIONS TECHNICAL CONSULTANTS
 St Simons Island, Georgia Washington, D.C.

**MULTIPLE OWNERSHIP COMPLIANCE
TWIN STATES BROADCASTING, INC.
WKWT - WWUC
UNION CITY, TENNESSEE
August 1994**

Twin States Broadcasting, inc. ("TSB") controls both WWUC (FM) and WKWT (FM), Union City, Tennessee. Filed simultaneous with this Multiple Ownership Compliance is a Proposed Rule Making requesting WKWT be ordered to Class C2. This Multiple Ownership Compliance assumes WKWT at Class C2 at the requested reference coordinates.

The combined WKWT - WWUC 70 dBu contour is hereinafter referred to as the "subject area". A study was conducted to determine the number of AM and FM transmitters within the subject area. Exhibit #1 indicates these locations:

1. WKWT (FM), Union City, TN (Subject)
2. WCMT-FM, Martin, TN
3. WWUC (FM), Union City, TN (Subject)
4. WWKF (FM), Fulton, KY
5. WCDZ (FM), Dresden, TN
6. WENK-AM, Union City, TN
7. WKZT-AM, Fulton, KY
8. WCMT-AM, Martin, TN

A study of nearby AM and FM stations was made to determine how many of these stations served all or part of the WKWT - WWUC subject area. Exhibit #2 demonstrates nearby AM stations whose 5.0 mV/m contour touches the subject area.:

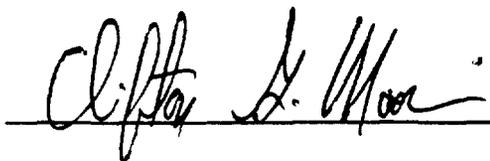
1. WNGO-AM, Mayfield, KY
2. WMUF-AM, Paris, TN

The study of nearby FM stations whose 70 dBu contour might touch the subject area was made. That exhibit is Exhibit #3:

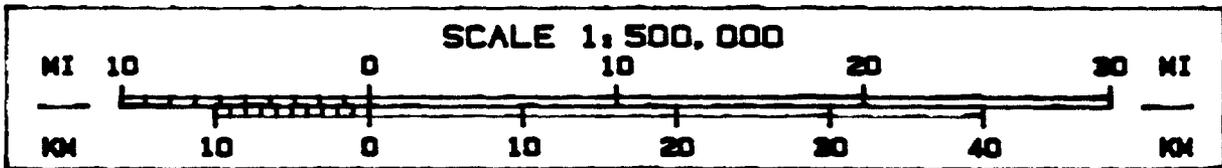
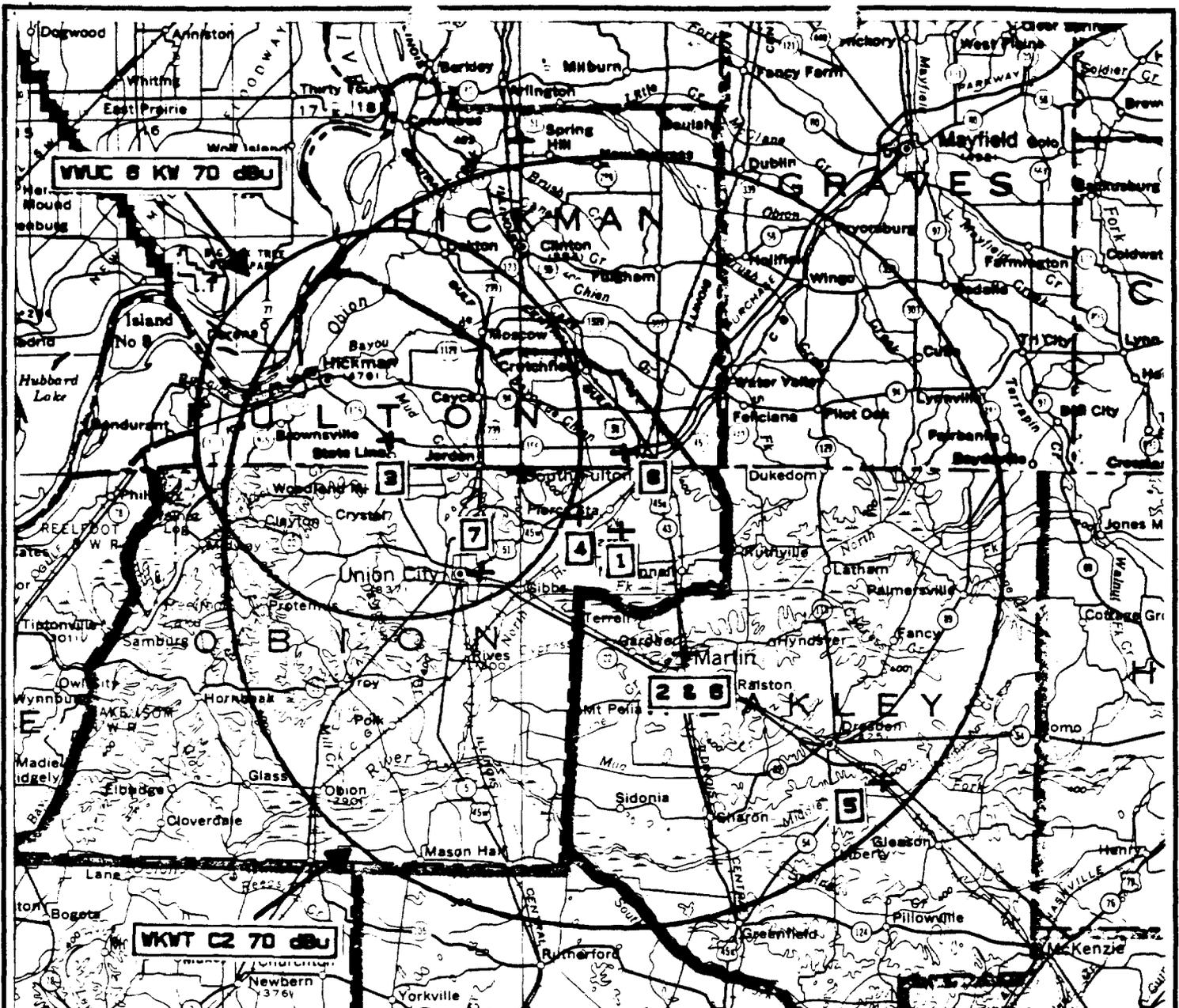
1. WYNU (FM), Milan, TN
2. WWEZ (FM), Trenton, TN
3. WWYN (FM), McKenzie, TN
4. WBLN (FM), Murray, KY

Adding the 8 stations that have transmitters within the subject area to the 2 nearby AM stations that touch the subject area with their 5.0 mV/m signal and the 4 nearby FM stations that touch the subject area with their 70 dBu signal produces a total of 14 services in the subject area. Controlling 2 of 14 stations in the subject area is control of 14.28% of the total services. As this is less than 50% of the stations in the subject area, it is thought this duopoly is permissible.

We have attempted to be as accurate as possible in the preparation of this study based on the FCC database dated June 30, 1994. Therefore any construction permits that have commenced broadcasting since that date would not be indicated. Bromo Communications, Inc. is not responsible for errors or omissions in the AM or FM databases. Every effort has been made to strive for accuracy in this study. This study is true and correct to the best knowledge of the undersigned.



Clifton G. Moor
Bromo Communications, Inc.



TRANSMITTERS IN SUBJECT AREA

MAP IS COMPOSITE 1,500,000 USGS FOR THE STATES OF TENNESSEE, KENTUCKY AND MISSOURI.

**EXHIBIT #1
TWIN STATES BROADCASTING
DUOPOLY STUDY
WKVT / WWUC
UNION CITY, TENNESSEE**

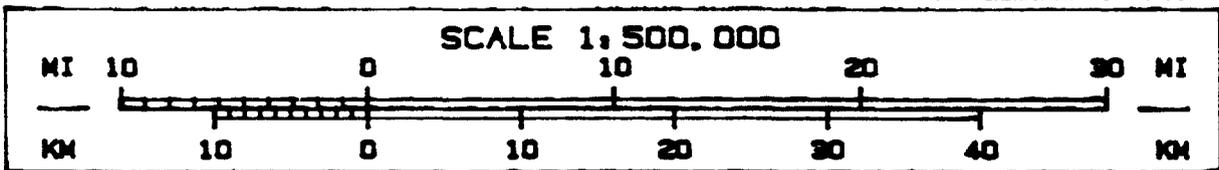
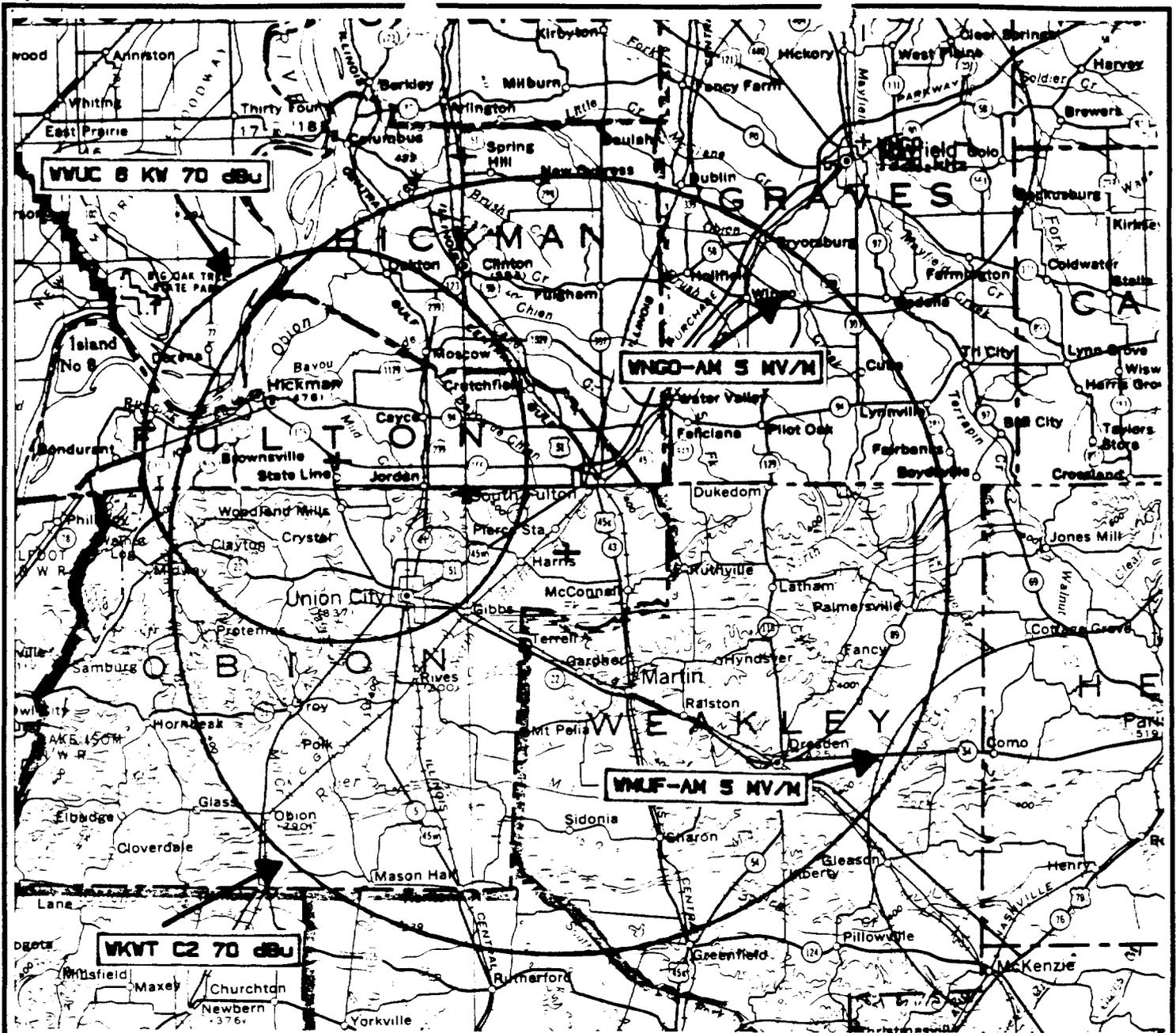
AUGUST 1984

BROMO COMMUNICATIONS

St Simons Island, Georgia

BROADCAST TECHNICAL CONSULTANTS

Washington, D.C.



NEARBY AM STATIONS

EXHIBIT #2
TWIN STATES BROADCASTING
DUOPOLY STUDY
WKWT / WWUC
UNION CITY, TENNESSEE

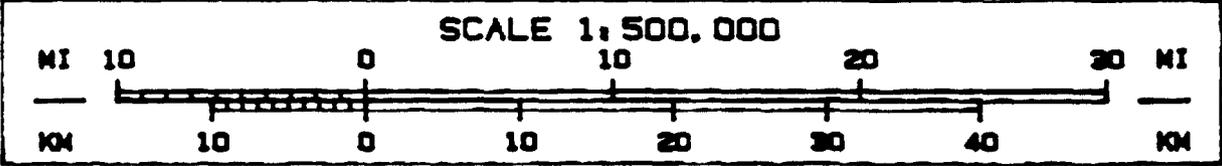
AUGUST 1984

BROMO
COMMUNICATIONS

BROADCAST
 TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D.C.



NEARBY FM STATIONS

ALL CONTOURS ARE 70 dBu CITY GRADE.

EXHIBIT #3
TWIN STATES BROADCASTING
DUOPOLY STUDY
WKWT / WWUC
UNION CITY, TENNESSEE

AUGUST 1984

BROMO
COMMUNICATIONS

BROADCAST
 TECHNICAL CONSULTANTS

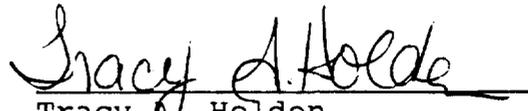
St Simons Island, Georgia

Washington, D.C.

CERTIFICATE OF SERVICE

I, Tracy A. Holden, a secretary in the law firm of Brown, Nietert & Kaufman, Chartered, do hereby certify that on this 5th day of August, 1994, I caused copies of the foregoing "PETITION FOR RULE MAKING AND ORDER TO SHOW CAUSE" to be delivered by first class mail, postage prepaid, to the person named below:

Chartres Media, Inc.
c/o Station KYRX(FM)
901 South Kings Highway
Cape Girardeau, MO 63701


Tracy A. Holden

F:\ESK\0727PROS.TSB

**TWIN STATES BROADCASTING
COMMENTS/COUNTERPROPOSAL
TO DOCKET NO. 94-113 RM 8514
CAPE GIRARDEAU, MO AND
UNION CITY, TN
NOVEMBER 1994**

These comments are filed on behalf of Twin States Broadcasting ("Twin States") licensee of WKWT (FM), Union City, TN. Twin States has previously filed a request for rule making to substitute Channel 284 C2 for the presently allotted 285 A at Union City. In order for this to meet §73.207 spacing, KYRX, Chaffee, MO is required to move to Channel 230 A from its present Channel 284A. No site change is required of KYRX. Simultaneous to the Twin States petition, Kevin G. Greaser requested the use of Channel 230 A at Cape Girardeau, MO as that city's third FM allotment. Because §73.207 requires co-channel Class A stations to be a minimum of 115 KM apart and because there is only a distance of 18.2 KM between KYRX and the Greaser proposal, the Twin States petition and the Greaser petition are mutually exclusive.

Union City, TN presently has authorized two FM and one AM stations:

WKWT	285A	3 KW	91 M HAAT
WWUC	289A	6 KW	100 M HAAT
WENK	1240	1 KW	Unlimited

Cape Girardeau, MO presently has authorized three FM and three AM stations:

KRCU	215A	6 KW	79 M HAAT
KGMO	264C	100 KW	301 M HAAT
KEZS	275C1	100 KW	289 M HAAT
KZIM	960	5 KW/.5 KW	Full Time
KCGQ	1220	.25 KW	Day (secondary low power night authority)
KAPE	1550	5 KW	Day (secondary low power night authority)

An extensive study was made of the Twin States gain area¹ and compared to the Greaser proposed area. All nearby stations were examined to ascertain which stations touched either area with its 60 dBu signal². Class C3, C2 and C1 stations were calculated at class maximum unless they had invoked §73.215 processing. Class A and Class C and educational stations were plotted at their licensed facilities. Because only full time AM stations were considered in this study, only night time AM signals were plotted. Plotting all contributing stations subdivides the gain areas into pockets. The area and population of each pocket was then estimated. Population was based on the 1990 Census and an even distribution of population was assumed. The following chart summarizes the population, area and number of services in each pocket:

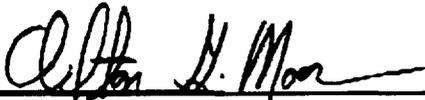
Service	Twin States		Greaser	
	Area	Population	Area	Population
3rd	30 Sq KM	543	0 Sq KM	0
4th	483	8681	0	0
5th	664	11936	0	0
6th	1087	19531	25	816
7th	1087	19531	224	7343
8th	966	17361	298	9790
9th	664	11936	597	19581
10th	423	7596	671	22028

¹ Gain area was derived by subtracting the present WKWT Class A area from the proposed Class C2 area. Population gain was similarly calculated.

² A complete list of all stations whose 60 dBu touches either gain area is found as Exhibit # 10 and 10A.

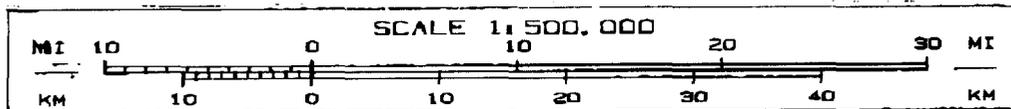
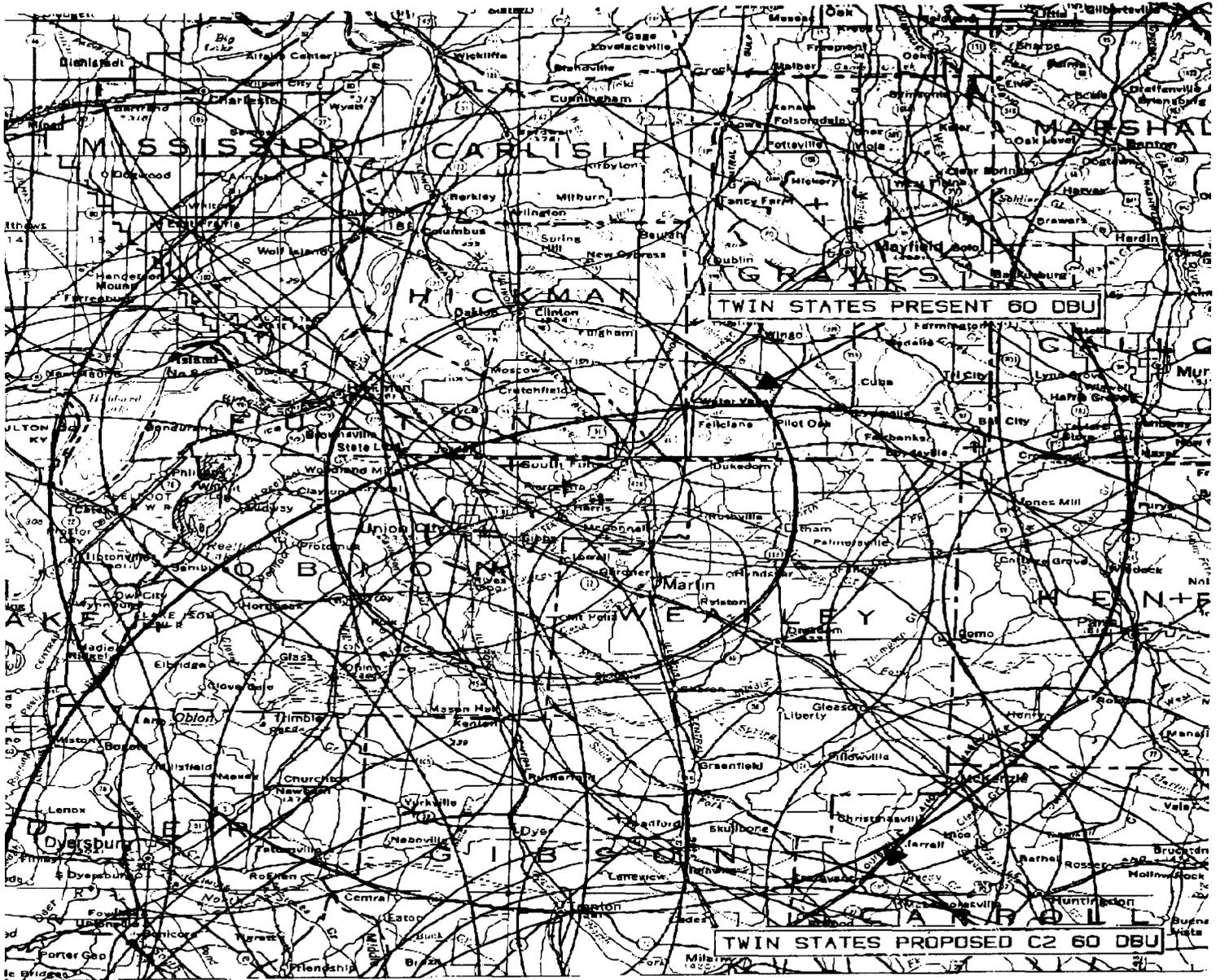
There are pockets that Twin States provides the third, fourth and fifth full time service while the highest priority service Greaser can provide is sixth. The Twin States counterproposal offers more total persons than Greaser. 108,508 persons reside in the Twin States gain area while only 81,586 persons reside in the Greaser proposed area. Likewise, Twin States proposes to serve a larger gain area. The Twin States gain area is 6036.8 square kilometers while the Greaser area is only 2486.8 square kilometers.

In summary, Twin States provides third, fourth or fifth full time service to 21,160 persons while Greaser provides none. Overall Union City serves 26,922 more persons than the Greaser proposal. Finally, Union City serves 3550 square kilometers more than the Greaser proposal. It is believed that the foregoing reasons are firm substantiation that the public would be far better served by the allotment of the Union City proposal, the ordering of WKWT to Channel 284 C2 and the substitution of Channel 230 A at Chaffee, MO for Channel 284 A.



Clifton G. Moor
Bromo Communications, Inc.

November 25, 1994



TWIN STATES PROPOSED GAIN AREA

MAP IS COMPOSITE USGS 1:500,000 SCALE FOR STATES OF TENNESSEE, KENTUCKY AND MISSOURI

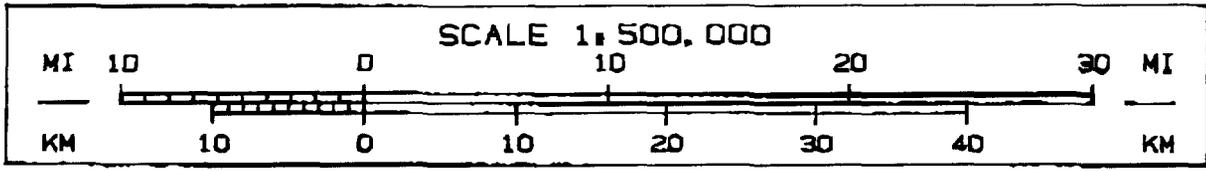
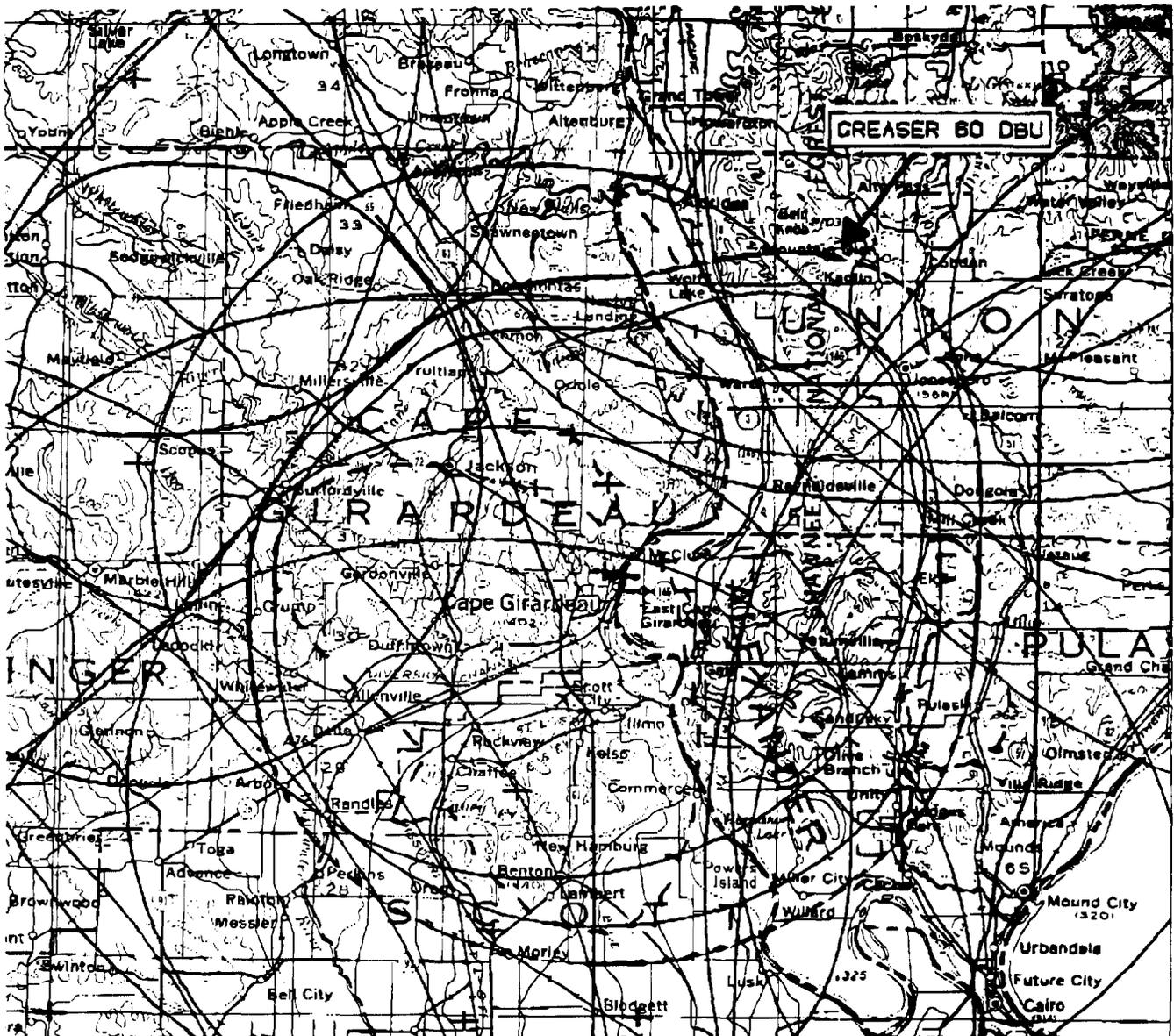
EXHIBIT #1

TWIN STATES BROADCASTING
 COMMENTS/COUNTERPROPOSAL
 TO DOC NO. 94-113 RM-8514
 CAPE GIRARDEAU, MO AND
 UNION CITY, TN
 NOVEMBER 1994

BROMO BROADCAST
 COMMUNICATIONS TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D.C.



GREASER PROPOSED AREA

MAP IS COMPOSITE USGS 1:500,000 SCALE FOR STATES OF MISSOURI AND ILLINOIS.

EXHIBIT #1A

TWIN STATES BROADCASTING
 COMMENTS/COUNTERPROPOSAL
 TO DOC NO. 94-113 RM-8514
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