

DOCKET FILE COPY ORIGINAL

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

In the matter of )  
 )  
JAMES A. KAY, JR. )  
 )  
Licensee of one hundred sixty- )  
four Part 90 licenses in the )  
Los Angeles, California area. )

WT Docket No. 94-147

RECEIVED  
MAR 29 1996  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

To: The Commission

**STATEMENT IN OPPOSITION TO WIRELESS TELECOMMUNICATIONS BUREAU'S  
REQUEST TO MODIFY THE HEARING DESIGNATION ORDER AND  
REQUEST FOR COMMISSION REVIEW OF THE HEARING DESIGNATION ORDER**

James A. Kay, Jr. ("Kay"), by his attorneys, files this Statement in Opposition to the Wireless Telecommunications Bureau's ("Bureau") Request to Modify the Hearing Designation Order and Request for Commission Review of the Hearing Designation Order, and asks that the Commission accept and consider this pleading in light of the recent referral<sup>1</sup> from the Presiding Judge in this matter, pursuant to Section 0.341(c) of the Commission's Rules. The Bureau has urged that the Order to Show Cause, Hearing Designation Order and Notice of Opportunity for Hearing for Forfeiture, FCC 94-147, released December 13, 1994 (the "HDO") be modified to delete twelve (12) licenses from the HDO on the basis that Kay does not own any of these twelve (12) licenses. In this pleading, Kay will show that the relief requested by the Bureau is another example of the numerous deficiencies in the Bureau's case against Kay. Consequently, Kay requests that the Commission, sua sponte, undertake a review of

<sup>1</sup> Order, FCC 96M-35, released March 15, 1996.

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the propriety and bases for the Bureau's issuance of the HDO and, Kay submits, dismiss the HDO. In support thereof, Kay states as follows:

#### INTRODUCTION

1. On December 13, 1994, the Bureau released the HDO. A copy of the HDO is attached hereto as Exhibit "A".

2. In the HDO, the Bureau sought to, inter alia, revoke one hundred sixty-four (164) licenses allegedly held by Kay. (See page one of the HDO ("James A. Kay, Jr. (Kay), holder of one hundred sixty-four (164) land mobile licenses . . .")). A list of the one hundred sixty-four (164) licenses that the Bureau designated for hearing is attached as Appendix A to the HDO.

3. One year later, on December 4, 1995, the Bureau filed a Motion for Summary Decision seeking to revoke, without any opportunity for Kay to defend himself, Kay's licenses and terminate the above-captioned proceeding based on Kay's alleged pre- and post-designation misconduct.

4. On February 23, 1996, fourteen (14) months after issuance of the HDO and three (3) months after it filed its Motion for Summary Decision, the Bureau filed a Motion for Leave to File Supplement and Supplement to Motion for Summary Decision and Order Revoking Licenses (the "Motion"). A copy of the Motion is attached hereto as Exhibit "B".

5. In the Motion, the Bureau sought to "clarify" its position in this case and only to seek revocation of the licenses identified as Nos. 1-152, thereby omitting Nos. 153-164, in

Appendix A of the HDO. According to the Bureau, License Nos. 153-164, "are held in the names of entities ('Multiple M Enterprises, Inc.: Kay, Jr., James A. LP' and 'Marc Sobel') in which the full nature and extent of Kay's involvement remains unclear." See, Motion, Pg. 2.

6. On March 6, 1996, the Bureau filed a request for the Presiding Judge to certify the issue of whether the license of Multiple M and the eleven (11) licenses of Sobel be removed from the above-captioned proceeding because there is no evidence to establish the Kay owns or controls the twelve (12) licenses (the "Request for Certification"). A copy of the Request for Certification is attached hereto as Exhibit "C".

7. By Order, FCC 96M-35, released March 15, 1996, the Presiding Judge certified to the Commission, pursuant to Section 0.341(c) of the Commission's Rules, "the question of whether the one license held by Multiple M and the eleven licenses held by Marc Sobel that are specified in Appendix A to the Show Cause Order should be the subject of revocation in this case and/or whether the licenses should be removed from the Show Cause Order."

#### **ARGUMENT**

**I. THE MOTION SETS FORTH ANOTHER DEFICIENCY IN THE BUREAU'S CASE AGAINST KAY. BASED ON THE DEFICIENCIES THAT KAY HAS IDENTIFIED, GOOD CAUSE EXISTS TO DISMISS THE HDO**

8. In the Motion, filed over fourteen (14) months after issuance of the HDO, the Bureau admits a blatant deficiency in its case against Kay and adds substantial doubt as to the factual

basis underlying the HDO. In Paragraph Three (§ 3) of the HDO, the Bureau alleged that "[i]nformation available to the Commission also indicates that James A. Kay, Jr. may have conducted business under a number of names. . . We believe these names include some or all of the following: . . . Multiple M Enterprises, Inc.; . . . Marc Sobel dba Airwave Communications . . ." After fourteen (14) months and Kay's production of over 36,000 documents to the Bureau, the Bureau now admits that at least a portion of Paragraph Three (§ 3) of the HDO was incorrect. The Bureau further admits that, in discovery responses dated March 10, 1995, Kay disclosed the identities of Marc Sobel and Multiple M Enterprises, Inc. and their "relationship" to Kay. See, Motion, n.2. Nonetheless, the Bureau did not take any steps to "clarify" the nature of the ownership of the licenses controlled by Mr. Sobel and Multiple M Enterprises, Inc. until it filed the Motion on February 23, 1996, almost one year after receiving Kay's discovery responses. This delay has never been explained.<sup>2</sup> In his March 15, 1996 Order, the Presiding Judge, too, correctly recognized that making Multiple M and Sobel parties to this case would further delay these proceedings. It is clear, however, that the delay was caused solely by the Bureau's own actions.

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<sup>2</sup> However, it is interesting to note that the Motion was filed on the heels of a FOIA request by Kay seeking information related to a recent Section 308(b) letter propounded by the Bureau to Sobel, a letter which Kay was not informed of by the Bureau, but which came to Kay's attention anyway.

9. There is substantial evidence indicating that there are additional flaws in the Bureau's case. For example, Attachment 2 to the Bureau's Response to Kay's First Set of Interrogatories (filed on or about March 8, 1995) contained a letter, dated December 9, 1991, from William Drareg of William Drareg & Associates, with a business address of 1800 Century Park, Century City, Los Angeles. A copy of the December 9, 1991 letter from William Drareg is attached hereto as Exhibit "D". Mr. Drareg's letter alleged that Kay violated certain Commission Rules and the Communications Act of 1934.

10. As part of Kay's informal discovery,<sup>3</sup> Kay and his attorneys have made monumental efforts to locate Mr. Drareg, including searching various directories, databases, California state records and contacting the management of the building located at 1800 Century Park, Century City, California. Furthermore, a February 5, 1996 letter from Kay's attorneys to the Bureau asked for information as to the whereabouts of this individual; it has never been acknowledged or responded to. See Exhibit "E". Based on this exhaustive search, it appears that neither Mr. Drareg nor William Drareg & Associates have ever existed, yet this "party" is relied upon anyway by the Bureau.

11. The name "Drareg" is evidence that the author of the December 9, 1991 letter is likely to be a fictitious person. "Drareg" spelled backward is "Gerard". As evidenced in the few

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<sup>3</sup> Formal discovery has been stayed by the Presiding Judge pending his consideration of the Bureau's summary decision request.

relevant documents that the Bureau has produced to date, Gerard Pick (prior to his death in 1995) was one of the chief complainants about Kay to the Bureau. As noted in Kay's Declaration, attached hereto as Exhibit "F", Gerard Pick and his son, Harold, are fierce competitors of Kay, and are defendants in ongoing litigation initiated by Kay in Los Angeles County Superior Court, and, most significantly, are parties that have submitted multiple complaints to the Bureau that appear to have instigated the instant proceeding.

12. Kay submits that this is merely the tip of the iceberg. If and when Kay is permitted to undertake formal discovery of the Bureau's evidence and witnesses, Kay has full reason, based on what he has learned to date, that the Bureau's case will dissolve, as it has with the Sobel, Multiple M. Enterprises, and Drareg matters.<sup>4</sup>

13. These are only some of the discrepancies that Kay has identified.<sup>5</sup> The Motion addresses only one of the numerous

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<sup>4</sup> These and other deficiencies were raised by Kay in a pleading entitled "Supplemental Opposition to Wireless Telecommunications Bureau's Motion for Summary Decision as Supplemented by Motion for Leave to File Supplement and Supplement to Motion for Summary Decision and Order Revoking Licenses", filed with the Presiding Judge on March 15, 1996. On March 20, 1996, the Bureau filed a Reply to Kay's Supplemental Opposition. A copy of the Bureau's March 20, 1996 Reply is attached hereto as Exhibit "G". The Reply contains an insightful glimpse at this case--not for what the Reply contains, but for what it does not contain, since the Bureau did not refute any factual assertion made by Kay or others in the Supplemental Opposition.

<sup>5</sup> Kay challenges, *inter alia*, the motives and biases of the Bureau's "witnesses" in his Declaration, attached as Exhibit "F" hereto.

deficiencies that the Bureau is trying to avoid should this case proceed to trial. It is virtually impossible for Kay to identify additional deficiencies in the Bureau's case without opportunity for full discovery, which Kay has not yet had. Recognizing that its own case will not survive full and complete discovery and hearing, the Bureau seeks to terminate these proceedings on summary decision so as to avoid these and other inadequacies.

14. Considering this, the Commission now has the opportunity to rectify a grievous error committed by the Bureau: the designation of this matter in the first place. Already, both the Bureau and Kay have spend unneeded time, effort and funds on this matter. As the parties proceed, it becomes all too obvious that the Bureau has failed to prepare even the basics of its case and lacks an evidentiary basis to seek the revocation of even the licenses that, without question, have been authorized to Kay.

15. So as to spare the Commission and Kay any further expenditures of time, effort, and funds when such resources are limited, Kay urges the Commission to, sua sponte, undertake a review of the propriety and bases for the Bureau's issuance of the HDO. As is obvious from the information presented herein, such a review will evidence that the Bureau had no material foundation upon which to issue the HDO in the first place. A full and fair evaluation of the case will lead the Commission to the only possible conclusion: that the HDO must be dismissed as improvidently issued and the proceeding terminated forthwith. Only such a result can halt an unnecessary and unfair proceeding



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing James A. Kay Jr.'s Statement in Opposition to Wireless Telecommunications Bureau's Request to Modify the Hearing Designation Order and Request for Commission Review of the Hearing Designation Order was hand-delivered on this 29th day of March, 1996 to the following:

John I. Riffer, Esquire  
Assistant General Counsel  
Federal Communications Commission  
Room 610  
1919 M Street, N.W.  
Washington, D.C. 20554

Gary P. Schonman, Esquire  
Federal Communications Commission  
Hearing Branch  
Mass Media Bureau  
Suite 7212  
2025 M Street, N.W.  
Washington, D.C. 20554

and sent via first-class mail, postage prepaid on this 29th day of March, 1996 to:

W. Riley Hollingsworth, Esquire  
Deputy Associates Bureau Chief  
Wireless Telecommunications Bureau  
1270 Fairfield Road  
Gettysburg, Pennsylvania 17325-7245

  
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Scott A. Fenske

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3. Information available to the Commission also indicates that James A. Kay, Jr. may have conducted business under a number of names. Kay could use multiple names to thwart our channel sharing and recovery provisions; for example, Kay may inflate his loading by reporting the same mobile user on multiple licenses. We believe these names include some or all of the following: Air Wave Communications; John C. Allen dba Buddy Sales; Buddy Corp.; Buddy Sales; Buddys Sales; Buddy Corp. dba Buddy Sales; Buddy Corp. dba Southland Communications; Consolidated Financial Holdings; Hessman Security; James Kay; James A. Kay, Jr.; Lucky's Two Way Radio; Luckys Two Way Radio; Luckys Two Way Radios; MetroComm; Multiple M Enterprises, Inc.; Oat Trunking Group; Oat Trunking Group, Inc.; Marc Sobel dba Airwave Communications; Southland Communications; Southland Communications, Inc.; Steve Turelak; Triple M Enterprises, Inc.; V&L Enterprises; and VSC Enterprises.

4. We also have information that Kay may willfully cause interference to radio systems, including systems carrying public safety communications traffic, in order to coerce or mislead licensees into retaining him as their communications provider. After allegedly causing interference to the radio systems of others, Kay or his sales staff allegedly calls on the persons experiencing the interference and offers to provide them higher quality communications service.

5. Information before us indicates that Kay and his sales staff have misused the Commission's processes by, for example, fraudulently inducing licensees and others to sign blank Commission forms seeking modification of licenses, or to sign forms the intent of which was misrepresented by Kay or his employees. This reportedly involves Kay or his staff offering to provide ancillary repeater service to land mobile licensees that operate mobiles that communicate through a repeater (mounted on a tower, mountain top or edifice). Kay allegedly then used the forms to cancel the licenses, modify the licenses, or obtain control of the licenses by having them assigned to himself. Kay then provides communication service on the spectrum formerly licensed to the customer. The customer, in some instances, does not realize for years that Kay has misappropriated its license.

6. On January 31, 1994, Commission staff requested information from Kay to determine whether Kay had committed rule violations by not meeting the construction and placed-in-operation requirements of the Commission's Rules. 47 C.F.R. §§ 90.155, 90.631 and 90.633. The staff's letter also requested information to enable the staff to determine if stations licensed to Kay have permanently discontinued operation in violation of our rules. 47 C.F.R. § 90.157. Finally, the letter directed Kay to provide information detailing the loading of end users on Kay's base stations in order to assess Kay's compliance with the channel loading requirements of our rules. 47 C.F.R. §§ 90.313, 90.623, 90.627, 90.631 and 90.633. In order to assess compliance with our construction and operation requirement, the staff requested that Kay identify the stations for which he holds FCC licenses as well as those he manages. The staff directed Kay to note those that are on U.S. Forest Service land. The inquiry letter sent to Kay also directed that he identify all station licenses he holds under all names under which he does business.

7. The letter also requested that Kay substantiate the loading of his

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<sup>4</sup> Inspection of Station WNWK982 at Mount Lukens, CA conducted July 22, 1994 by the FCC's Los Angeles Field Office Bureau.

<sup>5</sup> Letter from W.Riley Hollingsworth, Deputy Chief, Licensing Division, Private Radio Bureau, to James A. Kay, Jr. dated January 31, 1994.

stations by providing customer lists and telephone numbers. Such business records are the Commission's generally acceptable proof of loading. Amendment of Part 90 of the Commission's Rules to Eliminate Separate Licensing of End User of Specialized Mobile Radio Systems, 7 FCC Rcd 5558, 5560 (1992). Kay was later assured that proprietary information would be considered confidential.

8. Kay filed a response, but it provided none of the requested information. He simply referenced some unrelated information provided to the Commission staff at other times. Kay failed to provide the requested information after numerous extensions of time, responding at one point that "there is no date...for which the submission of the requested information would be convenient."

9. We will designate this matter for hearing to determine Kay's fitness to remain a Commission licensee, in light of his alleged violations of the Communications Act and the Commission's Rules, his alleged misconduct, and his refusal to respond to the Commission inquiry.

10. Accordingly, IT IS ORDERED that pursuant to Sections 312(a) and (c) of the Act, James A. Kay, Jr. is directed to show cause why his licenses in the Private Land Mobile Radio Services should not be revoked or cancelled<sup>6</sup> at a hearing before an Administrative Law Judge, at a time and place to be designated in a subsequent Order, upon the following issues:

a) To determine whether James A. Kay, Jr. has violated Section 308(b) of the Act<sup>7</sup> and/or Section 1.17 of the Commission's Rules,<sup>8</sup> by failing to provide information requested in his responses to Commission inquiries;

b) To determine whether James A. Kay, Jr. has willfully or repeatedly operated a conventional station in the trunked mode in violation of Section 90.113 of the Commission's Rules;

c) To determine if Kay has willfully or repeatedly violated any of the Commission's construction and operation requirements in violation of Sections 90.155, 90.157, 90.313, 90.623, 90.627, 90.631, and 90.633 of the Commission's Rules;<sup>9</sup>

d) To determine whether James A. Kay, Jr. has abused the Commission's processes by filing applications in multiple names in order to avoid compliance with the Commission's channel sharing and recovery provisions in violation of Sections 90.623 and 90.629;

e) To determine whether James A. Kay, Jr. willfully or maliciously interfered with the radio communications of other systems, in violation of Sections 333 of the Act;<sup>10</sup>

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<sup>6</sup> Several of the rule violations discussed above are subject to an automatic cancellation condition: if the licensee does not meet his or her construction deadline, or if the licensee permanently discontinues operation, the license cancels automatically. See e.g., 47 C.F.R. §§ 90.157, 90.631 and 90.633.

<sup>7</sup> 47 U.S.C. § 308.

<sup>8</sup> 47 C.F.R. § 1.17.

<sup>9</sup> 47 C.F.R. §§ 90.155, 90.157, 90.313, 90.623, 90.627, 90.631, and 90.633.

<sup>10</sup> 47 U.S.C. § 333.

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f) To determine whether James A. Kay, Jr. has abused the Commission's processes in order to obtain cancellation of other licenses;

g) To determine, in light of the evidence adduced pursuant to the foregoing issues, whether James A. Kay, Jr. is qualified to remain a Commission licensee;

h) To determine if any of James A. Kay, Jr.'s licenses have automatically cancelled as a result of violations listed in subparagraph (c) pursuant to Sections 90.155, 90.157, 90.631 or 90.633 of the Commission's rules; and

11. IT IS FURTHER ORDERED that pursuant to Sections 312(b) and (c) of the Act Kay is directed to show cause why he should not be ordered to cease and desist from failing to operate his Private Mobile Land Radio licenses substantially as set forth in the licenses, from violating Sections 308(b) and 333 of the Act, from violating Commission Rules Sections 1.17, 90.155, 90.157, 90.313, 90.623, 90.627, 90.629, 90.631, 90.633<sup>11</sup> and/or from abuse of processes as described in paragraph 10.

12. IT IS FURTHER ORDERED that the above issues be consolidated for hearing pursuant to § 1.227(a)2) of the Commission's Rules.<sup>12</sup>

13. IT IS FURTHER ORDERED that the Chief, Private Radio Bureau SHALL BE a party to the proceeding.

14. IT IS FURTHER ORDERED, that to avail himself of the opportunity to be heard pursuant to Section 1.91(c) of the Commission's rules,<sup>13</sup> Kay, in person or by attorney, shall file with the Commission within thirty (30) days of the receipt of the Order to Show Cause, Hearing Designation Order and a written appearance stating that he will appear at the hearing and present evidence on the matters specified in the Order. If a party fails to file an appearance within the time specified, the right of that party to a hearing shall be deemed to have been waived. See Section 1.92(a) of the Commission's rules.<sup>14</sup> Where a hearing is waived, a written statement in mitigation or justification may be submitted within thirty (30) days of the receipt of the Order. See Section 1.92(a) of the Commission's rules. In the event the right to a hearing is waived by the party to this proceeding, the presiding Officer, or the Chief Administrative Law Judge if no presiding officer has been designated, will terminate the hearing proceeding and certify the case to the Commission in the regular course of business and an appropriate order will be entered. See Section 1.92(c) of the Commission's rules.

15. IT IS FURTHER ORDERED that pursuant to Section 312(d) of the Act<sup>15</sup>, the burden of proceeding with the introduction of evidence and the burden of proof shall be on the Commission.

16. IT IS FURTHER ORDERED that irrespective of whether Kay is determined to be qualified to be a Commission licensee, or it is determined appropriate to revoke or cancel any or all of his licenses, it shall be

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<sup>11</sup> 47 C.F.R. §§ 1.17, 90.155, 90.157, 90.623, 90.627, 90.631, and 90.633.

<sup>12</sup> 47 C.F.R. § 1.227(a)(2).

<sup>13</sup> 47 C.F.R. § 1.91(c).

<sup>14</sup> 47 C.F.R. § 1.92(c).

<sup>15</sup> 47 U.S.C. § 312(d).

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determined, pursuant to Section 503 of the Act,<sup>14</sup> whether an ORDER FOR FORFEITURE shall be issued against James A. Kay, Jr. for willful and/or repeated violations of the Act and the Commission's Rules discussed in the preceding paragraphs in an amount not to exceed \$10,000 for each violation or each day of a continuing violation, except that the amount assessed for any continuing violation shall not exceed a total of \$75,000 for any single act or failure to act.

17. IT IS FURTHER ORDERED that in connection with the possible forfeiture liability noted above, this document constitutes notice pursuant to Section 503(b)(3) of the Act.

18. IT IS FURTHER ORDERED that the Secretary send a copy of this order via certified mail-return receipt requested to Dennis K. Brown, Esquire, Brown and Schwaninger, P.C., 1835 K Street N.W., Suite 650, Washington, D.C. 20006, and have this order or a summary thereof published in the Federal Register.

FEDERAL COMMUNICATIONS COMMISSION

William F. Caton  
Acting Secretary

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<sup>14</sup> 47 U.S.C. § 503(b).

Appendix A

The following call signs are held in the name of  
James A. Kay, Jr.:

	<u>Call Sign</u>	<u>Service</u>	<u>California Area</u>
1.	KJV843	Business	Montrose Upland Signal Hill Malibu Lake Northridge Van Nuys
2.	WEC934	Business	Montrose Northridge Van Nuys
3.	WIE974	Business	Montrose Northridge Van Nuys
4.	WIF759	Business	Montrose Upland Reseda
5.	WIH315	Business	Montrose Northridge Van Nuys
6.	WIH339	Business	Montrose Corona Northridge Van Nuys
7.	WIH681	Business	Northridge Rancho Palos Verdes Van Nuys
8.	WIH868	Business	Montrose Corona Upland Van Nuys
9.	WIH872	Business	Montrose Upland Signal Hill Malibu Lake Corona Van Nuys
10.	WIH886	Business	Montrose Northridge Van Nuys

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The following call signs are held in the name of  
James A. Kay, Jr. (cont.):

	<u>Call Sign</u>	<u>Service</u>	<u>California Area</u>
11.	WIH946	Business	Corona Upland
12.	WII253	Business	Northridge Malibu Lake Reseda Valencia Canyon Country Simi Valley
13.	WII619	Business	Montrose Northridge Malibu Lake Van Nuys
14.	WII621	Business	Sylmar Northridge Reseda
15.	WII695	Business	Montrose Upland Signal Hill Malibu Lake Corona Van Nuys
16.	WII697	Business	Sylmar Malibu Lake Northridge Van Nuys
17.	WII755	Business	Montrose Northridge Van Nuys
18.	WII787	Business	Montrose Northridge Van Nuys
19.	WII874	Business	Montrose Northridge Malibu Lake Van Nuys
20.	WII905	Business	Montrose Northridge Van Nuys

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The following call signs are held in the name of  
James A. Kay, Jr. (cont.):

	<u>Call Sign</u>	<u>Service</u>	<u>California Area</u>
21.	WII909	Business	Northridge Malibu Lake Van Nuys
22.	WIJ267	Business	Northridge Malibu Lake Van Nuys
23.	WIJ310	Business	Montrose Northridge Van Nuys
24.	WIJ316	Business	Montrose Upland Signal Hill Malibu Lake Corona Van Nuys
25.	WIJ343	Business	Montrose Northridge Santa Paula Van Nuys
26.	WIJ362	Business	Montrose Northridge Malibu Lake Newbury Park Van Nuys
27.	WIJ533	Business	Montrose Northridge Van Nuys
28.	WIJ635	Business	Montrose Upland Signal Hill Malibu Lake Corona Van Nuys
29.	WIJ644	Business	Montrose Northridge Van Nuys

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The following call signs are held in the name of  
James A. Kay, Jr. (cont.):

	<u>Call Sign</u>	<u>Service</u>	<u>California Area</u>
30.	WIJ663	Business	Northridge Malibu Lake Van Nuys
31.	WIJ700	Business	Montrose Northridge Van Nuys
32.	WIJ704	Business	Montrose Los Angeles Northridge Malibu Monte Nido Van Nuys
33.	WIJ712	Business	Montrose Northridge Van Nuys
34.	WIJ754	Business	Montrose Upland Signal Hill Malibu Lake Corona Van Nuys
35.	WIJ831	Business	Montrose Malibu Lake Northridge Van Nuys
36.	WIJ867	Business	Montrose Los Angeles Van Nuys
37.	WIJ893	Business	Northridge Upland Malibu Lake Reseda Newhall

The following call signs are held in the name of  
James A. Kay, Jr. (cont.):

	<u>Call Sign</u>	<u>Service</u>	<u>California Area</u>
38.	WIJ992	Business	Montrose Northridge Reseda Van Nuys Newhall
39.	WIJ994	Business	Encino Northridge Newhall Canyon County Los Angeles Acton
40.	WIK205	Business	Montrose Upland Signal Hill Malibu Lake Corona Van Nuys
41.	WIK208	Business	Newbury Park Santa Paula Van Nuys
42.	WIK216	Business	Corona
43.	WIK220	Business	Sun Valley
44.	WIK261	Business	Montrose Upland Signal Hill Malibu Lake Corona Van Nuys
45.	WIK270	Business	Corona
46.	WIK278	Business	Van Nuys Northridge Canoga Park
47.	WIK287	Business	Corona
48.	WIK293	Business	Corona

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The following call signs are held in the name of  
James A. Kay, Jr. (cont.):

	<u>Call Sign</u>	<u>Service</u>	<u>California Area</u>
49.	WIK294	Business	Montrose Northridge Van Nuys
50.	WIK301	Business	Montrose Upland Signal Hill Van Nuys
51.	WIK304	Business	Canyon Country Newhall Canoga Park
52.	WIK308	Business	Los Angeles Glendale West Hills
53.	WIK310	Business	Corona
54.	WIK312	Business	Newhall Canoga Park
55.	WIK329	Business	Northridge
56.	WIK330	Business	Northridge
57.	WIK331	Business	Corona
58.	WIK332	Business	Corona
59.	WIK373	Business	Montrose Northridge Santa Paula Van Nuys
60.	WIK374	Business	Corona
61.	WIK376	Business	Corona Newport Beach San Bernardino
62.	WIK377	Business	Montrose Northridge Van Nuys

The following call signs are held in the name of  
James A. Kay, Jr. (cont.):

	<u>Call Sign</u>	<u>Service</u>	<u>California Area</u>
63.	WIK390	Business	Santa Paula Newberry Park Reseda
64.	WIK400	Business	Montrose Northridge Van Nuys
65.	WIK599	Business	Corona
66.	WIK611	Business	Corona
67.	WIK613	Business	Upland Corona
68.	WIK660	Business	Northridge Newbury Park Van Nuys
69.	WIK664	Business	Corona
70.	WIK708	Business	Corona
71.	WIK726	Business	Corona
72.	WIK727	Business	Corona
73.	WIK761	Business	Northridge
74.	WIK762	Business	Northridge
75.	WIK823	Business	Corona
76.	WIK875	Business	Corona
77.	WIK878	Business	Montrose Upland Signal Hill Malibu Lake Corona Van Nuys
78.	WIK896	Business	Corona Upland

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The following call signs are held in the name of  
James A. Kay, Jr. (cont.):

	<u>Call Sign</u>	<u>Service</u>	<u>California Area</u>
79.	WIK951	Business	Northridge Malibu Lake Van Nuys
80.	WIK983	Business	Corona
81.	WIL235	Business	Corona
82.	WIL256	Business	Corona
83.	WIL260	Business	Corona
84.	WIL342	Business	Corona
85.	WIL350	Business	Corona
86.	WIL372	Business	Montrose Northridge Corona Van Nuys
87.	WIL392	Business	Northridge Rancho Palos Verde Van Nuys
88.	WIL415	Business	Montrose Northridge Van Nuys
89.	WIL432	Business	Montrose Corona Northridge Van Nuys
90.	WIL436	Business	Corona
91.	WIL441	Business	Corona
92.	WIL442	Business	Corona
93.	WIL458	Business	Corona
94.	WIL462	Business	Los Angeles
95.	WIL469	Business	Corona

The following call signs are held in the name of  
James A. Kay, Jr. (cont.):

	<u>Call Sign</u>	<u>Service</u>	<u>California Area</u>
96.	WIL522	Business	Montrose Upland Signal Hill Northridge Corona Los Angeles
97.	WIL574	Business	Van Nuys
98.	WIL625	Business	Montrose Corona Van Nuys
99.	WIL653	Business	San Pedro
100.	WIL659	Business	Santa Paula
101.	WIL663	Business	Signal Hill Malibu Lake Van Nuys
102.	WIL665	Business	Montrose Los Angeles Northridge Van Nuys
103.	WIL697	Business	Montrose Corona Northridge Van Nuys
104.	WIL729	Business	Montrose Upland Signal Hill Malibu Lake Corona Van Nuys
105.	WIL733	Business	Corona Signal Hill Montrose Los Angeles Northridge Malibu Monte Nido Van Nuys

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The following call signs are held in the name of  
James A. Kay, Jr. (cont.):

	<u>Call Sign</u>	<u>Service</u>	<u>California Area</u>
106.	WQP957	Business	Northridge Malibu Lake Van Nuys
107.	WNIZ676	Commercial/ Conventional	Corona Upland
108.	WNJA910	Commercial/ Trunked	Corona Northridge Newbury Park
109.	WNJL306	Commercial/ Trunked	Corona
110.	WNKV762	Commercial/ Trunked	Banning Running Springs
111.	WNMT755	Commercial/ Conventional	Corona Montrose
112.	WNMY402	Commercial/ Trunked	Malibu Lake Montrose Corona
113.	WNMY773	Commercial/ Conventional	Corona Crestline Montrose
114.	WNPJ874	Commercial/ Trunked	Newbury Park Montrose Corona
115.	WNQK532	Business	Montrose Northridge
116.	WNQK959	Business/ Trunked	Banning
117.	WNSK552	Commercial/ Trunked	Running Springs Malibu Lake
118.	WNVL794	Commercial/ Conventional	Montrose Corona Running Springs