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June 27, 1996

RECEIVED

JUN 27 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: **Amendment of Section 73.202(b) FM Table of
Allotments (Smith, Nevada)**
(MM Docket No. 96-103; RM-8794) **DOCKET FILE COPY ORIGINAL**

Dear Mr. Caton:

Transmitted herewith on behalf of Chris Kidd d/b/a Kidd Communications is an original and four copies of his counterproposal proposing that Channel 268A be allotted to Truckee, California as first local transmission service; and the required channel substitutions at Susanville, California and Reno, Nevada be made in order to accommodate the new allotment. This counterproposal is respectfully directed to the Chief, Allocations Branch.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,


John F. Garziglia

Enclosure

044

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

In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket No. 96-103
Table of Allotments) RM-8794
FM Broadcast Stations)
(Smith, Nevada))

To: Chief, Allocations Branch

RECEIVED

JUN 27 1996

COUNTERPROPOSAL

Chris Kidd d/b/a Kidd Communications, by his attorneys, pursuant to Notice of Proposed Rule Making, DA 96-620, released May 6, 1996, hereby submits a counterproposal to the above-referenced proposal to allot Channel 271C3 to Smith, Nevada.^{1/} In support thereof, the following is submitted:

1. Chris Kidd proposes that Channel 268A be allotted to Truckee, California as a first local transmission service^{2/}; Channel 259A be allotted to Smith, Nevada as a first local transmission service^{3/} in lieu of Channel 271C3 as proposed in the Noticed of Proposed Rule Making; Channel 271C3 be substituted

^{1/} The comment date established in the Notice of Proposed Rule Making was June 27, 1996. Accordingly, this counterproposal is timely filed.

^{2/} Channel 258A may be allotted to Truckee, California at a reference site approximately 9.5 kilometers southwest of Truckee at 39° 17' 00" North Latitude, 120° 17' 52" West Longitude.

^{3/} Channel 259A may be allotted to Smith, Nevada at the reference coordinates of 38° 47' 53" North Latitude, 119° 16' 55" West Longitude, which are the same coordinates proposed in the Notice of Proposed Rule Making. This assumes, as discussed below, that an expression of interest is received to the allotment of a Class A channel to Smith, Nevada.

for Channel 269C3 at Reno, Nevada and the license of KRNV-FM be modified to specify operation on Channel 271C3^{4/}; and Channel 222C2 be substituted for Channel 271C2 at Susanville, California, and the facilities of KQNC(FM) be modified to specify operation on Channel 222C2^{5/}. Truckee, California is an incorporated town with a population of 3,484 persons (1990 U.S. Census). In support of this counterproposal, Chris Kidd states that he has a present intention to apply for Channel 268A at Truckee, California if it is allotted and, if authorized, to build a station promptly. The following is a table showing the proposed modifications:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Truckee, California	--	268A
Smith, Nevada	--	259A
Susanville, California	227C, 242C3, 271C2	222C2, 227C, 242C3
Reno, Nevada	225C, 238C, 269C3, 283C, 289C, 295C	225C, 238C, 271C3, 283C, 289C, 295C

^{4/} The reference coordinates for Channel 271C3 at Reno, Nevada are 39° 35' 03" North Latitude, 119° 47' 52" West Longitude, the present coordinates for KRNV-FM, Reno, Nevada.

^{5/} The license of KQNC(FM) was modified to specify operation on Channel 271C2 at Susanville, California in MM Docket No. 92-221. An application for operation on Channel 271C2 at Susanville has not yet been filed by the licensee of KQNC(FM). The operation of KQNC(FM) presently remains on Channel 271A at Quincy, California. The reference coordinates for Channel 222C2 at Susanville, California are 40° 27' 13" North Latitude, 120° 34' 14" West Longitude, the present reference coordinates for KQNC(FM) at Susanville.

2. This counterproposal should be preferred over the proposal contained in the Notice of Proposed Rule Making as this counterproposal allows the addition of a first local transmission service to both Smith, Nevada and Truckee, California, rather than just to Smith, Nevada, the community proposed in the Notice of Proposed Rule Making. To the extent that a Class A channel will be allotted to Smith, Nevada rather than a Class C3 channel, it is well established that the public interest is best served by the allotment of a Class A channel where an expression of interest is received in such a Class A channel. See Americus, Fort Valley and Smithville, Georgia, 6 FCC Rcd 942 (1991) (Class A channel allotted in place of a Class C3 channel where the allotment of a Class A channel would allow for an upgrade for another station and there was an express of interest in the Class A channel received); Cottage Grove and Bend, Oregon, 6 FCC Rcd 4208 (1991) (where a valid expression of use of a Class A channel has been received, and no party has made any showing that a higher class channel would provide a first or second full-time aural service or that a Class A channel is insufficient to provide the requisite signal coverage to the community, the Class A channel will be allotted to allow for an upgrade to also be made).

3. It is recognized that if only interest in a Class C3 channel at Smith, and not an interest in either a Class C3 or a Class A channel at Smith, is received by the Commission, the Commission's policy is not to consider the allotment of a Class A

channel to Smith. See Kingstree and McClellanville, South Carolina, 3 FCC Rcd 1637, 1639 (1988) (Class A channel not allotted in place of a Class C2 channel where no interest in the Class A channel was expressed); Bradford, Vermont, 2 FCC Rcd 6964 (1987). If no interest in a Class A channel is received for Smith, then the Commission must compare the benefits of the allotment of Channel 271C3 to Smith with the benefits of the allotment of Channel 268A to Truckee. Under the Commission's allotment priorities^{6/} an allotment at either community will provide first local transmission service. As noted in the Notice of Proposed Rule Making, Smith has a 1990 U.S. Census population of 1,033 persons. Truckee, according to the 1990 U.S. Census, has a population of 3,484 persons. It is well settled that when choosing between proposed allotments for two communities when each proposal would provide a first local aural transmission service, the Commission bases its decision on a community population comparison. See Athens and Atlanta, Illinois, 11 FCC Rcd 3445, 3446 (1996) (when comparing two competing counterproposals that would both provide a first local service, and neither community is distinguishable based upon reception services, the decisional factor is the population difference); Blanchard, Louisiana and Stevens, Arkansas, 10 FCC Rcd 9828, 9830 (1995) (allotment awarded to the larger of two communities, where both

^{6/} Under Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 91 (1982), the allotment priorities are: (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)].

are deserving of first local transmission service). In the event that a comparison must be made between the communities, it is evident that the allotment of Channel 268A to Truckee, California should be preferred. While an allotment to either community would provide first local aural transmission service, Truckee, California has 1990 U.S. Census population of 3,484 persons as compared to Smith, Nevada which has a 1990 U.S. Census population of 1,033 persons.

4. Attached to this counterproposal is the engineering statement of Peter V. Gureckis & Associates showing that the proposals in this counterproposal may be made in accord with the Commission's rules. The engineering statement notes that the substitution of Channel 271C3 for Channel 269C3 at Reno, Nevada is short spaced to KSSJ(FM), Shingle Springs, California by 19.63 kilometers. KSSJ(FM) is licensed for operation on Channel 270B. This short spacing arises, however, from the specification by KSSJ(FM) of contour protection under Section 73.215 of the Commission's rules to the licensed facility of KRNv-FM. As shown in the engineering statement, there is no potential for greater interference created by the substitution of channels here, as both Channel 271C3 and Channel 269C3 are first adjacent channels to Channel 270B and no transmitter site change is contemplated for the modification of KRNv-FM to Channel 271C3. Accordingly, as shown in the engineering statement, all contour relationships remain exactly the same, and there is no potential for any increased or new interference areas as the result of the channel

substitution. See Eatonton and Sandy Springs, Georgia, and Anniston and Lineville, Alabama, 6 FCC Rcd 6580, 6583 (1991) (the Commission is required to examine, if short spacings are maintained in channel substitutions, whether the interfering contours of either station involved in the arrangement might extend closer to the other, thereby creating a greater potential for interference). Chris Kidd states, pursuant to Commission policy, that should he be the ultimate permittee of Channel 268A at Truckee, California, he will reimburse the licensee of KRNV-FM for its reasonable costs of changing its frequency. See New Sharon and Albia, Iowa and Memphis, Missouri, 6 FCC Rcd 7429, 7430 (1991) (reimbursement by the ultimate permittee of a new allotment is required for the reasonable costs of changing a frequency of an existing station in order to make a new allotment).

5. The substitution of Channel 222C2 for Channel 271C2 at Susanville, California is not believed to require a reimbursement commitment, as there is presently no authorized facility occupying Channel 271C2 at Susanville, California.^{7/} See Boonville and Columbia, Missouri, 7 FCC Rcd 2970 (1992) (applicants are not entitled to reimbursement for a modification of channel). In the event, however, that the Commission determines that KQNC(FM) is entitled to reimbursement, Chris Kidd hereby states his intention, if ordered by the Commission, to likewise reimburse KQNC(FM) for its reasonable and prudent costs in changing its

^{7/} As noted above, KQNC(FM) has yet to file an application for its modified channel at Susanville, California.

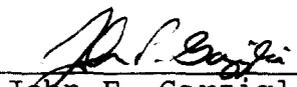
application materials and its reasonable and prudent costs already expended in contemplation of Channel 271C2 at Susanville, which costs are not equally applicable to Channel 222C2 at Susanville, in the event that he is the ultimate permittee for the new allotment at Truckee, California.

6. The public interest would be well served by the adoption of the channel allotments proposed in this counterproposal. The channel allotments proposed in this counterproposal will result in the provision of a first local transmission service to a larger community presently without such service.

WHEREFORE, for the reasons above, it is proposed that Channel 268A be allotted to Truckee, California as first local transmission service, and the required channel substitutions at Susanville, California and Reno, Nevada be made in order to accommodate this new allotment.

Respectfully submitted,

CHRIS KIDD
d/b/a KIDD COMMUNICATIONS

By: 
John F. Garziglia
His Attorney

Pepper & Corazzini, L.L.P.
1776 K Street, N.W.
Suite 200
Washington, D.C. 20554
(202) 296-0600

June 27, 1996

Petitioner's Outline of Public Interest Benefits

Truckee, California now an incorporated town is a licensable community according to the FCC standards. In fact, there were two separately owned licensed radio stations operating in Truckee many years ago.

The petitioner worked at one of those stations, KTRT, a class IV facility, on 1400 kHz. KTRT operated 1000 watts per day and 250 watts during the night. The other station originally licensed as KNLT was operated as a class A facility. KNLT was eventually licensed to Carnelian Bay, California and KTRT went dark sometime in the late 1980's and its license was revoked in 1994.

As far as remotely located small resort towns are concerned Truckee is major. The population of the town is 12,000, plus there are adjacent areas with additional population. Interstate 80 goes through Truckee and it is known as the Gateway to the Sierras as well as North Lake Tahoe and many ski resorts.

Many public safety, health, and emergency needs can be met with a radio station operating in Truckee that are not currently met or served by radio stations which provide a paper signal over Truckee. There is rugged mountainous terrain around Truckee which prevents reliable signals. Furthermore, the stations which provide a 60 or 70 dbu paper signal over Truckee are western Nevada stations who are mostly concerned with the Reno, Nevada area first and the Carson City, Nevada area second, as their studios are located in Reno, Nevada (another state). These stations are licensed to Reno, Carson City, or Incline Village, Nevada. Two of the stations are licensed to communities in North Lake Tahoe, California, however, they still operate out of Reno, Nevada. Also North Lake Tahoe is located at least 15 miles south of Truckee.

The petitioner has explored many opportunities over the past few years for a new broadcast service at Truckee. The FM band is extremely crowded and shows no availabilities at anywhere near Truckee. This is due primarily to the large number of stations allocated in western Nevada, Sacramento and the Eastern Sierras north of Truckee. Therefore, the only possible way to allocate an FM radio frequency to Truckee is relocate allocations elsewhere.

The petitioner has devised a plan where only one licensed operating FM station will have to move its frequency. This frequency move is from 101.7 MHz to 102.1 MHz. They will not have to relocate their transmitter site and their existing transmitter and Antenna can be re-tuned.

An existing allocation which has no 301 filing, as of this date, will be substituted and the rule making petition in which we are responding to will be substituted.

Kidd Communications hereby proposes to allocate channel 268A to Truckee, California.

In order to allocate channel 268A to Truckee, channel 271C3 must be substituted for channel 269C3. These are the license facilities of KRNK-FM Reno, Nevada, which can be operated on the substituted channel at the same transmitter site with the same ERP and the same tower height. As stated above, the existing equipment can be re-tuned on site for this channel change.

In order to allocate 271C3 to Reno, Nevada, channel 271C2 at Susanville, California, must be changed to channel 222C2. This is an exact substitute and at the present time there are no facilities operating or in the process of construction for this facility. The petitioner checked with the commission staff and as of last week, June 17, 1996, there was not a 301 application on file for this allocation.

In order to allocate channel 271C3 to Reno, Nevada a substitute channel at Smith, Nevada must be utilized. Channel 259 will meet the spacing allocations of either a Class A or a Class C3. Our channel search indicates that there is either a pending allocation or application to upgrade the facilities of KGVM Gardnerville-Minden, Nevada from a Class A to Class C3. This would involve the substitution of channel 257A for channel 256C3.

It is unknown if the licensee has an intention to build this facility or if he has notified the commission otherwise. If KGVM is not going to pursue the upgrade then channel 259C3 will meet the mileage separations at Smith, Nevada. If KGVM is going to pursue the upgrade then channel 259A will meet the mileage separations at Smith, Nevada.

In order to provide a first aural service for Truckee, California channel 268A must be utilized. To do this channel 271C3 is the only possible same facility substitute for KRNV-FM at Reno, Nevada. It would be contrary to the public interest and in violation of FCC section 307b to allocate channel 271C3 to Smith, Nevada because this would foreclose any opportunity for a new FM aural service at Truckee, California. There are considerably more FM allocations assigned to communities in Western and Northern Nevada than there are to communities in Northeastern California. An allocation to Truckee would be a first step and perhaps the only action that could begin to fairly balance FM channel assignments between northeastern California and western Nevada.

There are many opportunities for other aural facilities at Smith, Nevada and a need for specifically a Class C3 has not been demonstrated. Furthermore, as stated by the commission and the petitioner in the rule making, Smith is only a subdivision. The petitioner indicates it has a zip code and 1033 persons. That amount of population hardly justifies operating a radio station of any size, let alone a Class C3. If any allocation is provided to Smith it is very speculative whether or not any facility will ever be built. In order to avoid warehousing of frequencies it would be more in the public interest to allocate a Class A channel to Smith, Nevada in lieu of a Class C3, even if a Class C3 will fit.

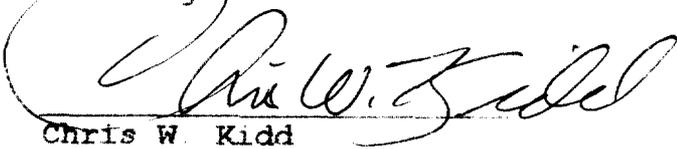
Because of the mountainous terrain it is very questionable whether a C3 at Smith would serve any significant additional population than a Class A. Therefore, this petitioner respectfully requests that the FCC demand from the original petitioner, proposed coverage maps with population and shadowing studies to document the bonafide need for a Class C3 over a Class A. If this is not done, a warehousing of frequencies will block other communities that need service.

In regard to the substitution of channels for KRNV-FM at Reno, Nevada there is a benefit to KRNV and the public, although not huge, should be noted. The FCC recently granted Class C2 facilities to KRNG at Fallon, Nevada channel 267C2, which is a second adjacent channel, to KRNV's channel 269C3. KRNG and KRNV both have overlapping 70 dbu and overlapping 60 dbu contours. Although they meet the mileage separations there are many table radios on the market which will have trouble separating these facilities in some areas. In their strong coverage areas an overload could be created where neither station could be heard clearly. In part of KRNV's 60 dbu area KRNG could be the only station heard.

KRNV-FM provides a unique news service to the public. They simulcast their television news and have provided exemplary news coverage when local and regional emergency situations have arisen in western Nevada. Although the FCC does not recognize second adjacent channel interference if it meets the mileage separations as these two facilities do, anything that could be done to maintain rather than deteriorate existing service is in the public interest. A move by KRNV-FM from channel 269C3 to channel 271C3 would clear them completely away by four channels from newly created interference by channel 267C2 and the future facilities of KRNG.

Naturally the petitioner recognizes that there will be some costs including an FCC filing fee and engineering fees to change the channels of KRNV-FM. Pursuant to FCC rules and guidelines if channel 268A is allocated to Truckee under this plan and petitioner becomes the grantee he will reimburse the licensee of KRNV-FM to change said facilities.

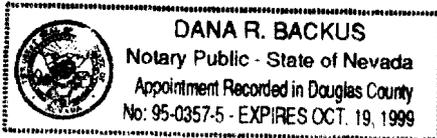
The petitioner hereby certifies that if channel 268A is allocated to Truckee, California that he will apply for said facilities and if so granted he will promptly build them as specified. Furthermore, petitioner certifies that all facts referenced in this exhibit are true and correct to the best of his knowledge.



Chris W. Kidd

c/o KTHO, PO Box AM
South Lake Tahoe, CA 96156
(702) 588-5259 (916) 542-5800

Date 6-26-96



ENGINEERING STATEMENT

**CHRIS KIDD
TRUCKEE, CALIFORNIA**

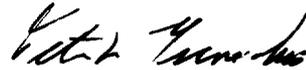
JUNE, 1996

**ENGINEERING STATEMENT IN SUPPORT OF A COUNTERPROPOSAL
TO AMEND THE FM TABLE OF ASSIGNMENTS**

PETER V. GURECKIS & ASSOCIATES

I, **PETER V. GURECKIS**, certify that I am a Consulting Radio Engineer, and that my qualifications are known to the Federal Communications Commission and that my firm has been retained by **CHRIS KIDD**, to prepare this statement.

I further state that the calculations and exhibits contained herein were prepared by me personally or under my direction and that all facts contained therein are true to my knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true.



PETER V. GURECKIS
PETER V. GURECKIS & ASSOCIATES

DATE: **JUNE 26, 1996**

PETER V. GURECKIS & ASSOCIATES

ENGINEERING STATEMENT

CHRIS KIDD
TRUCKEE, CALIFORNIA

I INTRODUCTION

This Engineering Statement has been prepared on behalf of **CHRIS KIDD**, who requests a new FM assignment for Truckee, California.

The purpose of this statement is to request a counterproposal to the Notice of Proposed Rule Making to amend the Table of Contents in MM Docket No. 96-103, RM-8794.

The present petition for rule making filed by Donegal Enterprises (RM-8794) requests the allotment of Channel 271C3 to Smith, Nevada.

The proposed counterproposal by Chris Kidd requests the allotment of Channel 268A to Truckee, California, Channel 259A to Smith, Nevada, Channel 271C3 in lieu of Channel 269C3 at Reno, Nevada and Channel 222C2 in lieu of Channel 271C2 at Susanville, California.

Thus, the proposed counterproposal by Chris Kidd requests the amendment of the FM Table of Assignments as follows:

	<u>Present</u>	<u>Assignment</u>	<u>Proposed</u>
Truckee, California	-----		268A
Smith, Nevada	-----		259A
Susanville, California	227C, 242C3, 271C2		222C2, 227C, 242C3
Reno, Nevada	225C, 238C, 269C3 283C, 289C, 295C		225C, 238C, 271C3 283, 289C, 295C

II ENGINEERING DISCUSSION

A. Proposed FM Assignment for Truckee, California

Channel 268 can be assigned to Truckee, California at a site area southwest of Truckee. Figure 1, is a map showing the proposed site, approximately 9.5 kilometers from Truckee. The proposed site has line-of-sight to all of Truckee. Further, the proposed site complies with the minimum distance rules with the requested changes as shown above.

The geographical coordinates of the proposed site is as follows:

N. Lat. : 39° 17' 00"

W. Long.: 120° 17' 52"

Figure 2 is a computer study of Channel 268A at the above coordinates which complies with the minimum rules except to Station KRNK on Channel 269C3 at Reno. It is proposed to change KRNK to Channel 271C3.

B. Proposed FM Assignment to Smith, Nevada

Channel 259A can be assigned to Smith, Nevada in lieu of its present request for Channel 271C3 using the coordinates specified in its rule making.

Figure 3 is a computer study of Channel 259A which complies with the minimum distance rules at its proposed site.

C. Proposed FM Assignment to Susanville, California

Channel 271C2 is presently assigned to Susanville, California. It is proposed that Channel 222C2 be assigned in lieu of Channel 271C2.

Channel 222C2 complies with the minimum distance rules at the site of Channel 271C2.

Figure 4 is a computer study of Channel 222C2 at the coordinates for Channel 271C2.

D. Proposed FM Assignment to Reno, Nevada

Station KRVN is now licensed to Channel 269C3 at Reno, Nevada. It is proposed by this counterproposal to change Station KRVN channel to 271C3.

Figure 5 is a computer study of Channel 271C3 at the licensed tower site of Station KRVN.

It should be noted that Station KQNC has been granted the allotment of Channel 271C2 to Susanville, California and therefore, Channel 271A has been deleted at Quincy, California.

Further, this counterproposal proposes the allotment of other channels as discussed above for Susanville, California and Smith, Nevada.

Station KRVN is now licensed to Channel 269C3 at Reno, Nevada, the first adjacent channel to Station KSSJ Shingle Springs, California, on Channel 270B. It is presently short spaced by 19.63 kilometers.

This counterproposal requesting the allotment of Channel 271C3 for Station KRVN at Reno, Nevada is also the first adjacent channel to KSSJ at Shingle Springs, California on Channel 270B. It would also be short spaced by 19.63 kilometers.

Thus, although this counterproposal requests a change in Channel for Station KRVN at Reno, Nevada, there is no change in the present short spacing between Stations KRVN and KSSJ as it now exist.

Furthermore, no new or additional interference will result to Station KSSJ because Station KRVN's contours will remain at the same distances on Channel 271C3 as on its present licensed channel of 269C3.

FIGURE 2

PETER V. GURECKIS BROADCAST CONSULTANT
10410 WINDSOR VIEW DR. POTOMAC MD 20854

TRUCKEE
CA

REFERENCE		CLASS A	DISPLAY DATES
39 17 00 N			DATA 05-31-96
120 17 52 W		Current rules spacings	SEARCH 06-25-96
----- CHANNEL 268 -101.5 MHz -----			

CALL TYPE	CH# LAT	CITY LNG	STATE	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KRNVFM	269C3	Reno	NV	52.2	54.49	89.0	-34.51 *
LI ZCN	39 35 03	119 47 52	11.000 kW	150M	33.9	55.3	
	Olympic Broadcasters, Inc.				BLH941122KA		
KRNG.C	267C2	Fallon	NV	64.0	107.79	106.0	1.79 <
CP CN	39 42 30	119 10 16	1.650 kW	673M	67.0	65.9	
	Sierra Nevada Christian Music				BPH940405ML		961118
	>One-Step Application From Channel 267A						
KSSJ.C	270B	Shingle Springs	CA	232.9	70.88	69.0	1.88 <
CP CN	38 53 55	120 57 06	50.000 kW	145M	44.0	42.9	
	Olympic Broadcasters, Inc.				BPH921215IM		950502
	>From Channel 270B1 per D92-20						
AP268	268A	Gridley	CA	269.0	119.05	115.0	4.05
AP CN	39 15 55	121 40 38	6.000 kW	100M	74.0	71.5	
	Barney L. Dewey				BPH930514MB		931007
	>Amended 930819						
AP268	268A	Gridley	CA	269.0	119.05	115.0	4.05
AP CN	39 15 55	121 40 38	6.000 kW	100M	74.0	71.5	
	Kidd Communications				BPH930527MM		931007
KSSJ.A	270B	Shingle Springs	CA	229.3	73.23	69.0	4.23
AP ZCN	38 51 13	120 56 23	47.000 kW	154M	45.5	42.9	
	Olympic Broadcasters, Inc.				BMPH960215IE		
ALOPEN	268A	Gridley	CA	274.1	121.23	115.0	6.23
AL N	39 21 42	121 42 00	0.000 kW	0M	75.3	71.5	
	84-231		WO=	930422			930527
	># 55						
KHYL	266B	Auburn	CA	233.2	78.87	69.0	9.87
LI CN	38 51 28	121 01 39	36.000 kW	176M	49.0	42.9	
	Chancellor Broadcasting Licen				BLH850521KC		
KQNV	265A	Sparks	NV	78.0	45.18	31.0	14.18
LI CN	39 22 04	119 47 07	6.000 kW	62M	28.1	19.3	
	New World Enterprises, Inc.				BLH910830KB		

FIGURE 3

PETER V. GURECKIS BROADCAST CONSULTANT
10410 WINDSOR VIEW DR. POTOMAC MD 20854

SMITH
NV

REFERENCE		CLASS A or C3	DISPLAY DATES
38 47 53 N			DATA 05-31-96
119 16 55 W		Current rules spacings	SEARCH 06-25-96
----- CHANNEL 259 - 99.7 MHz -----			

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KGVM.C	256C3	Gardnerville-Minde	NV	290.2	51.92	42.0	9.92
CP ZCN	38 57 35	119 50 36	6.900 kW	-249M	32.3	26.1	
		Carson Valley Radio, Inc.			BPH910610ID		930916
>From channel 257A per D90-461							
KGVM.A	256C3	Gardnerville-Minde	NV	297.7	58.59	42.0	16.59
AP ZCN	39 02 35	119 52 49	0.160 kW	888M	36.4	26.1	
		Carson Valley Radio, Inc.			BMPH921223IG		
>From Channel 257A Per D90-461							
ALOPEN	259A	Jackson	CA	247.9	135.27	115.0	20.27
AL N	38 20 24	120 43 13	0.000 kW	0M	84.1	71.5	
		90-189					
>Effective 10-27-95-Reserved for KNGT per D90-189							
KGVM	257A	Gardnerville-Minde	NV	290.2	51.92	31.0	20.92
LI DCN	38 57 35	119 50 36	3.000 kW	-249M	32.3	19.3	
		Carson Valley Radio, Inc.			BLH850906KD		
>*To channel 256C3 per D90-461							
KZAK	261C2	Incline Village	NV	317.5	77.13	55.0	22.13
LI CN	39 18 38	119 53 01	0.760 kW	901M	47.9	34.2	
		North Lake Tahoe Broadcasting			BLH890414KA		
KCIV	260B	Mount Bullion	CA	204.9	154.74	113.0	41.74
LI CN	37 32 00	120 01 29	1.850 kW	640M	96.2	70.2	
		Bott Communications, Inc.			BLH890601KD		

FIGURE 5

PETER V. GURECKIS BROADCAST CONSULTANT
10410 WINDSOR VIEW DR. POTOMAC MD 20854

RENC
NV

REFERENCE		CLASS C3	DISPLAY DATES
39 35 03 N			DATA 05-31-96
119 47 52 W	Current rules spacings		SEARCH 06-25-96
----- CHANNEL 271 -102.1 MHz -----			

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
ALOPEN AL N	271C2 40 27 13	Susanville 120 34 14	CA 0.000 kW	325.7 0M	116.93 72.7	177.0 110.0	-60.07 *
	92-221						
>Site Restricted 8.2 km Northeast-Effective 8-31-95-Reserved for KQNC >D92-221							
AD271 AD	271C3 38 47 53	Smith 119 16 55	NV 0.000 kW	152.9 0M	97.99 60.9	153.0 95.1	-55.01 *
	Donegal Enterprises				RM8794		960408
>Site Restriction 3.9km East							
KRNVFM LI ZCN	269C3 39 35 03	Reno 119 47 52	NV 11.000 kW	0.0 150M	0.00 0.0	43.0 26.7	-43.00 *
	Olympic Broadcasters, Inc.				BLH941122KA		
KQNC LI CN	271A 40 03 36	Quincy 120 54 46	CA 0.130 kW	299.0 645M	109.11 67.8	142.0 88.3	-32.89 *
	Olympic Broadcasters, Inc.				BLH940309KA		
>*To Channel 271C2, Susanville, CA. per D92-221							
KSSJ.C CP CN	270B 38 53 55	Shingle Springs 120 57 06	CA 50.000 kW	232.6 145M	125.37 77.9	145.0 90.1	-19.63 *
	Olympic Broadcasters, Inc.				BPH921215IM		950502
>From Channel 270B1 per D92-20							
KSSJ.A AP ZCN	270B 38 51 13	Shingle Springs 120 56 23	CA 47.000 kW	230.6 154M	127.69 79.4	145.0 90.1	-17.31 *
	Olympic Broadcasters, Inc.				BMPH960215IE		
KNIS LI CN	217C 39 15 30	Carson City 119 42 36	NV 67.000 kW	168.2 660M	36.96 23.0	31.0 19.3	5.96
	Sapphire Broadcasting, Inc.				BLED891016KA		
KSSJ LI CN	270B1 38 37 51	Shingle Springs 120 51 22	CA 4.100 kW	220.9 252M	139.93 87.0	114.0 70.8	25.93
	Olympic Broadcasters, Inc.				BLH900918KA		
>*To Channel 270B per D92-20							

CERTIFICATE OF SERVICE

I, Tracey S. Westbrook, a secretary in the law firm of Pepper & Corazzini, L.L.P., do hereby certify that true copies of the foregoing "Counterproposal" were sent this 27th day of July, 1996, by first class, postage prepaid U.S. mail, to the following:

* Leslie K. Shapiro
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Federal Communications Commission
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Washington, D.C. 20554

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President
Donegal Enterprises, Inc.
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Sunbelt Broadcasting Company
Radio Station KRVN-FM
1790 Vassar Street
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Tracey S. Westbrook

* Via hand delivery