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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)
)
Grandfathered Short-Spaced)
FM Stations)
)
)

MM Docket No. 96-120
RM 7651

RECEIVED

OCT - 4 1996

Federal Communications Commission
Office of Secretary

**REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

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EXECUTIVE SUMMARY

This proceeding addresses the need for transmitter site flexibility for a specific “class” of FM stations. The affected stations are so-called “grandfathered” stations that became short-spaced with respect to the Commission’s minimum mileage separations prior to November 16, 1964. The current rules, as they relate to these affected stations, are in certain instances overly-restrictive, generally making it impossible for these stations to move their transmitter sites. Many of these facilities are Class A facilities located within the 60 dBu coverage pattern of larger Class B stations -- the former currently “locked” to their present site coordinates.

In response to the Commission’s *Notice of Proposed Rule Making*, and with the additional time granted NAB for the completion and analysis of two special studies -- one showing the probable number of stations that could be affected by this rule making; the other depicting current FM receiver performance in the presence of second adjacent channel interference -- NAB herein submits its reply comments in this proceeding. By these reply comments NAB supports a number of alternative ways in which grandfathered, short-spaced FM stations may be given the opportunity to improve/modify their technical facilities.

NAB’s support for revised FCC rules and policies to aid such grandfathered, short-spaced FM stations is based on notions of fairness and equity -- but also with a view toward the need to ensure the continued technical integrity of the FM radio service. NAB’s position also is founded on the recognition that scores of FM stations -- not just the grandfathered, short-spaced FM stations that are the focus of this proceeding -- may soon be required to seek new antenna sites. Thus, there is a present and growing need for

the Commission to adopt a policy of reasonable flexibility in allowing FM stations to relocate antenna facilities.

In these reply comments we have offered a series of suggestions for FCC rule and policy changes that will afford grandfathered, short-spaced stations the opportunity to seek and obtain facility changes. We believe that the Commission should be receptive to any of a number of concepts whereby these stations will be able to improve facilities without creating significant new interference to other affected stations. We also believe that many of these changes to grandfathered, short-spaced stations may actually result in *reduced* interference to the service of other, potentially affected FM broadcasters.

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REPLY COMMENTS OF THE
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I. INTRODUCTION AND SUMMARY

In these reply comments, based on a review of new data compiled by the National Association of Broadcasters¹ and with a view toward FM broadcasters' general need for flexibility of antenna siting over the immediate and near term, NAB offers a series of recommendations for Commission consideration. These recommendations go to the core issues in this proceeding -- the grant of antenna siting and facility change flexibility for "grandfathered, short-spaced" FM radio stations. However, they also reflect: (1) long-standing NAB policy on improving stations' facilities while also ensuring the technical integrity of the broadcast medium; and (2) the growing needs of *all* classes and categories of FM stations for flexibility in antenna siting and operation.

On July 22, 1996, NAB filed its initial comments in this proceeding. These comments were submitted in response to the *Notice of Proposed Rule Making* in the above-captioned proceeding.² In this proceeding the FCC is reviewing a range of

¹ NAB is a nonprofit, incorporated association of television and radio stations and networks which serves and represents the American broadcast industry.

² *Notice of Proposed Rule Making* ("Notice") in MM Docket No. 96-120 (FCC 96-236), released June 14, 1996.

potential changes to its rules and policies affecting certain "grandfathered" (authorized prior to November 16, 1964) and now "short-spaced" FM broadcast stations. Under current FCC regulations, these facilities generally are barred from modifying facilities or relocating transmitter sites.

The Commission's proceeding is based, in part, on theories advanced in a 1991 petition for rule making submitted by the consulting engineering firms of duTreil, Lundin & Rackley, Inc., Hatfield & Dawson and Cohen, Dippel & Everist. In comments filed on April 8, 1991, NAB generally opposed the petitioners' request. The basis for the NAB comments was concern over increased interference -- to other FM stations and to the FM medium as a whole -- were the FCC to adopt petitioners' plan. NAB's comments reiterated the Association's traditional view that the technical integrity of the broadcast media must be preserved and enhanced.

However, in light of several factors enumerated below, NAB's above-referenced July 22, 1996, comments observed that there may well be reasons for -- and ways that -- grandfathered FM stations could be afforded new opportunities to modify facilities in a fashion that would not result in significant new interference nor would be at odds with related FCC policies applicable to such changes. It is that belief which has governed our development of the positions set forth in today's reply comments.

At the same time we filed our July 22, 1996, comments, NAB filed a "Motion for Extension of Time in Reply Comment Deadline." This pleading sought an additional complement of time for the completion of studies designed to: (1) better assess the technical characteristics of radio receivers, particularly their ability to reject adjacent

channel interference³; and (2) determine the number and identity of FM stations that might fall into this class of “grandfathered, short-spaced” facilities.

NAB commissioned the first study to explore the thesis that improvements and refinements to radio receiver design have resulted in better rejection of second and third-adjacent channel interference, which would lessen concern over facility changes creating significantly increased technical interference to other stations. The second study was conducted to determine the scope of the controversy, in terms of the numbers of stations affected and the extent to which the grant of relief to this class of grandfathered, short-spaced FM operators might create increased interference to listeners’ reception of other stations. Importantly, NAB had these studies conducted in order to provide a factual foundation which could support an NAB position aimed at the FCC’s granting needed relief to some or all of these grandfathered, short-spaced FM stations. Additionally, NAB convened three meetings of an *ad hoc* group of consulting engineers and in-house engineers at broadcast group-owned companies. This group helped NAB determine the methodology of these studies and, following the receipt of the studies, aided NAB staff in the interpretation of the studies’ results.

NAB’s approach to the issues involved in this proceeding is not a novel one. In 1979, the NAB Board of Directors passed a resolution supporting a national radio allocations policy whereby daytime-only radio stations would be authorized to provide full-time service, so long as the changes to these facilities would not significantly diminish the service provided by other classes of stations. That policy -- advanced in NAB’s

³ As further explained in Appendix II, *FM Receiver Performance in the Presence of Second Adjacent Channel Interference*, NAB’s consultant employed readily available data on second adjacent channel interference -- data developed during the process of evaluating digital audio broadcasting. Also, the focus was on second adjacent channel interference because of the greater potential for it to affect FM service negatively than does third adjacent channel interference.

comments⁴ resulted in FCC rule changes⁵ allowing many former daytime-only AM stations to increase hours of operation.

NAB took a similar position in the late 1980s, when the issue was the increase in power by Class A FM stations.⁶ Here we again supported a policy whereby the majority of Class A stations was given the ability to increase facilities to an extent which did not create significant new interference to the service provided by stations operating on co-channels or adjacent channels.⁷

In the instant proceeding involving grandfathered, short-spaced FM stations, we believe a similar approach should be taken. It is our view that reasons of equity support an FCC position that will provide these heretofore "trapped" stations⁸ with a series of tools for demonstrating eligibility for improved/modified facilities. These tools would take the form of various, alternative showings that would be accepted by the Commission -- under revised rules and policies -- as supporting a change in long-frozen facilities.

These new FCC regulations would not involve any changes in the interference protection afforded co-channel or first adjacent channel stations. And though NAB would support improvements/modifications of facilities that might result in *some* increased short-spacing to second and third adjacent channel stations,⁹ it is our expectation that such

⁴ See NAB Comments in BC Docket No. 82-538, filed January 14, 1983.

⁵ See *First Report and Order* in BC Docket No. 82-538, 54 RR 2d (P&F) 951 (1983).

⁶ See *Notice of Proposed Rule Making* in MM Docket No. 88-375, 3 FCC Rcd 5941 (1988).

⁷ See *Second Report and Order* in MM Docket No. 88-375, 4 FCC Rcd 6375 (1989).

⁸ Among all the stations currently considered to be "grandfathered, short-spaced" facilities, the ones which generally present, in our view, the most persuasive "equity" case for technical improvement are the so-called "donut" stations, as described in the second half of ¶ 26 of the *Notice*.

⁹ As will be further emphasized below, NAB's support of granting measures of needed modification flexibility to certain grandfathered, short-spaced stations blocked by second-adjacent and third-adjacent channel operations *does not stand for the proposition that second and third-adjacent channel protections should be revisited for purposes of station allocations in general*. On the contrary, the receiver study conducted by NAB -- as well as reasoned communications policy considerations -- support continued use of current second and third adjacent channel protection standards for station allocations and other, related regulatory purposes.

increases would be minimal -- and that many modifications actually would result in a net *decrease* in the interference caused to these other stations.¹⁰

II. NAB'S NEW STUDIES PROVIDE USEFUL INFORMATION RELATING TO THE ISSUES INVOLVED IN THIS PROCEEDING.

NAB presents, as appendices to these reply comments, the results of two studies conducted to determine how the removal of all separation requirements for grandfathered short-spaced second and third adjacent channel stations would impact radio broadcasters and listeners. It has been the view of NAB and the *ad hoc* engineering group which we convened for these purposes (*see discussion supra*) that two general topics needed to be considered. The first is the number of radio stations that would be impacted by such a change in the Commission's rules. The second is what impact the resulting increase in interference (in certain portions of station coverage areas) would have on today's radio receivers. The results of the former study are contained in Appendix I; the results of the latter study are contained in Appendix II.

A. Number of impacted radio stations

To determine how many radio stations would be impacted by the removal of all separation requirements for grandfathered, short-spaced, second and third adjacent channel stations, NAB produced an analysis of *probable* grandfathered second and third adjacent short-spaced stations (*see Appendix I*). This analysis shows that there are currently 312 FM stations that: (1) do not meet the second and/or third adjacent channel

¹⁰As interfering signals are brought closer together, approaching co-location, actual interference areas *may* decrease -- depending upon signal strength variations due to natural and man-made signal shadowing, antennas pattern aberrations, signal polarization, etc.

separation requirements in 47 CFR Section 73.209; and (2) appear to have first come on the air prior to November 16, 1964. These stations can be grouped by class as follows:

Class A	57
Class B	206
Class B1	2
Class C	44
Class C1	3

TOTAL	312

The stations can also be grouped by state as follows:

AL	2	NH	1
CA	50	NJ	17
CT	6	NY	24
DE	2	NC	25
DC	4	OH	28
FL	2	PA	32
GA	6	RI	4
IL	24	SC	4
IN	6	TN	6
KY	1	TX	5
MD	17	VA	7
MA	15	WV	3
MI	16	WI	5

Our analysis shows that there are 460 *probable* short-spaced *situations*. There are more short-spaced *situations* than there are short-spaced *stations* because a single station can be involved in more than one short spacing. These short-spaced situations can be grouped as follows:

2nd adjacent channel short spacings:	322
3rd adjacent channel short spacings:	138

TOTAL	460

To determine how many stations do not meet the second and/or third adjacent channel spacing requirements, the FCC's FM Engineering Database was used. To determine how many of these short-spaced stations came on the air prior to

November 16, 1964, data from *Broadcasting & Cable Yearbook* was employed. The resulting list of stations can only be deemed “probable” (as opposed to “definitive”) for the following reasons:

- It is likely that some of the stations on the list do not qualify as grandfathered short-spaced stations due to facilities modifications that they have made over the past 32 years. It is possible for a station that qualified for grandfathered status in 1964 to have modified its facilities since then in such a manner that the station still remains short-spaced, but has lost its grandfathered status.
- It is likely that some of the on-air dates that appear in *Broadcasting & Cable Yearbook* are not completely accurate because, in many instances, they are based on information supplied by broadcast licensees who may not know exactly when their stations first went on the air.

A definitive analysis of all grandfathered short-spaced stations would require review of individual station records on file with the Federal Communications Commission. The limited time and resources available to produce this report prevented NAB from providing such a detailed analysis here.

B. Impact of increased interference on receivers

If grandfathered short-spaced stations were allowed to move around within each other's coverage areas more freely, there would be certain geographical areas that would experience increased interference. NAB contracted with engineering consultant Thomas Keller to determine what impact this increased interference would have on the listening public. Keller's analysis (*see Appendix II*) shows that automotive receivers are generally much better at rejecting unwanted co and first adjacent channel interfering signals than home stereos and portable radios. Two of the three non-automotive receivers studied are significantly less capable of rejecting unwanted 2nd adjacent channel interfering signals

that the automotive receivers. (Due to limited time and resources, including the fact that second adjacent-channel data -- but not third adjacent-channel data -- were readily available, Mr. Keller's analysis does not include 3rd adjacent channel interference tests.)

The following table summarizes Keller's test results. It shows the desired signal to undesired signal (D/U) ratios, in dB, that resulted in a 35 dB signal-to-noise (S/N) ratio in the radio receiving the desired signal. The S/N ratio used was quasi-peak. A 35 dB quasi-peak S/N ratio is generally similar to a 45 dB root-mean-square (RMS) S/N ratio. Five different radios were tested. The table compares the test results with the D/U ratios that are the basis for the Commission's FM separation requirements.

<i>Radio</i>	<i>2nd Adjacent D/U at -35 dB S/N in Desired Signal</i>
Delco Model 16192463 (car)	< -48*
Denon Model TU-380RD (hi fi)	-40
Panasonic Model RX-FS430 (portable)	-17
Pioneer Model SX-201 (hi fi)	-26
Ford Model F4XF-19B132-CB (car)	< -48*
<i>FCC Allocation Standard</i>	<i>-40</i>

*No specific value could be obtained for these interference conditions because the radio under test rejected interference well enough to prevent signal degradation to 35 dB at the 48 dB D/U testbed limit.

The shaded area in the above table indicates all of the instances where a radio, under the given interference condition, does not meet the interference-rejection assumptions embodied in the Commission's current FM separation requirements. Thus, these receiver data do not support general relaxation of second adjacent-channel separation requirements.

III. **THE COMMISSION SHOULD DEVELOP A SET OF REVISED RULES AND POLICIES THAT WOULD ADDRESS GRANDFATHERED, SHORT-SPACED FM STATIONS.**

Based on the results of the above-described studies, on the discussions we have had with our *ad hoc* group of consulting and industry engineers and also with a view to the growing needs of the entire FM radio industry for greater siting flexibility, NAB believes the time is right for the Commission to develop a revised set of rules and policies aimed at aiding heretofore "locked-in" grandfathered, short-spaced FM radio stations. It is our view that affording a responsible level of relief to members of this limited class of FM stations may be accomplished without creating significant new interference to the reception of other stations' facilities. Indeed, the record of this proceeding already reflects proposals whereby the interference *created* by grandfathered, short-spaced FM stations could be *reduced* by certain facility changes -- reduced in terms of both population receiving interference and land area receiving interference.

In order to ensure that levels of interference are not increased significantly by grandfathered, short-spaced stations seeking to move or change facilities, the Commission should be presented with showings to support these stations' proposals. As explained further, below, we believe these stations should be afforded a series of devices by which they could present such a showing. These showings could be based on a number of factors -- factors which would provide a responsible foundation for the grant of relief.

However, in advancing this plan to the Commission, NAB must underscore its view that *no* regulatory change be based on lessened concern over co-channel or first adjacent channel protection. Additionally, we applaud the Commission's statement that it has "...no intention of relaxing second-adjacent-channel and third-adjacent-channel spacing

requirements as allotment and assignment criteria....”¹¹ Indeed, our concern over the possibility that this or a future Commission might modify its overall FM allocations criteria, based on the record in the instant proceeding, has been a paramount factor as NAB approached these issues and has worked to develop a supportable plan for modifying grandfathered, short-spaced FM facilities.

Another consideration supporting our views in this “grandfathered short-spaced” proceeding is the growing, general need for flexibility in modifying existing FM stations’ facilities. Each day, stations are finding their tower leases expiring and facing non-renewal. Local zoning authorities are often providing significant obstacles to stations seeking to modify facilities at locations that meet all relevant FCC interference-protection criteria. But, of even greater consequence -- and the subject of thorough discussion among the members of our *ad hoc* engineering group -- is the likelihood of massive numbers of FM antennas, currently mounted on TV towers, needing to be relocated to new tower sites upon these TV facilities’ modifications to accommodate the transition to digital transmission technology.¹²

That is, sooner or later, a majority of FM stations -- regardless of station class or regulatory history -- will be facing an involuntary site move. Thus, we believe that the steps taken by the Commission in the instant proceeding may well serve as a prototype for the rules and policies that the Commission will have to consider and adopt in order to allow absolutely necessary site moves by other FM operators.

¹¹ Notice, *supra* note 2, ¶25.

¹² See, e.g. *Sixth Further Notice of Proposed Rule Making* in MM Docket No. 87-268, adopted July 25, 1996.

IV. THE SHOWING(S) THAT WOULD SUPPORT RELIEF.

In adopting a revised set of rules and policies aimed at granting relief to grandfathered, short-spaced FM stations, the Commission has a number of possible choices. One choice simply is to ignore second and third-adjacent channel interference. And while this holds the attraction of simplicity, it is NAB's view that this single approach would be too blunt an instrument to use in affording relief, especially in light of the results of our receiver study. However, in the event that the Commission does choose this regulatory route, we would urge the agency to condition any such grants on a subsequent review of the interference levels actually created and changed.

But, rather than simply ignoring second and third adjacent channel interference, we would prefer that the Commission adopt a revised regulatory approach that would grant tailored relief to grandfathered, short-spaced FM stations. The station proponent would be given a series of choices in demonstrating why the requested modification should be approved by the Commission.

First of all, *every* proponent would be required to demonstrate that it actually is a "grandfathered, short-spaced" FM station. That is, and as we have acknowledged in these comments and the body of Appendix I as well, the list of stations we are providing the Commission may not depict the actual status of particular stations -- either those listed or not listed. Following this "basic qualification" showing, the FM proponent then would support its request with one or more additional showings. Among these showings would be:

1. That the modification would result in a net *decrease* in the number of listeners experiencing interference *caused* by the station proponent to the signals of other FM stations;

2. That the modification would result in a net *decrease* in the land area of interference *caused* by the station proponent to the signals of other FM stations;
3. That the transmitter site shift would not be to a location near a major traffic thoroughfare -- a site move that could create massive interference to the mobile radio audience; and/or
4. That the modification of the transmitter site would be to a site within a "buffer zone" around the current transmitter site. This buffer zone¹³ would be of a size determined by the Commission -- a size perhaps based on a fixed mileage standard for all stations, perhaps based on existing station class, perhaps based on the extent of existing short-spacing or perhaps based on a percentage of the service area radius of the station proponent.

Under such an approach, the FM station proponent's showing would qualify the station for a rebuttable presumption that grant of relief should be provided. That is, unlike the current situation where no modification could take place without the affected station(s) consent, the burden would then shift to these potentially affected stations to show why the requested modification should not be granted. In this fashion we believe that grandfathered, short-spaced stations would be given a reasonable mechanism for improving facilities without negating the due process rights of other affected stations.

V. CONCLUSION

In this proceeding the Commission addresses a limited class of FM stations, inaugurating service prior to November 16, 1964, that have been "locked in" involuntarily by the Commission's evolving FM allocations policies and the passage of time. As other stations have taken full and creative advantage of station modification opportunities, these

¹³ The center of the buffer zone would continue to be the site coordinates of the station transmitter as of the date of the Commission's action in the instant proceeding. That is, a station employing the buffer zone alternative could not, over time, create a series of sequential buffer zones in order to accomplish a site move beyond the farthest extent of the original (and only) buffer zone.

stations' technical facilities have remained unchanged for nearly 32 years. It is our view that these FM pioneers deserve a long-delayed, but measured, opportunity to modify and improve their own facilities.

To be sure, some non-grandfathered and non-short-spaced stations may be less than receptive to these facility changes. However, we expect that a significant number -- if not a majority -- of these stations may themselves soon be in critical need of a similar degree of site and facility flexibility. Thus, we trust that a reasonable set of revised FCC rules -- aimed at improvement of grandfathered, short-spaced FM stations -- not only will

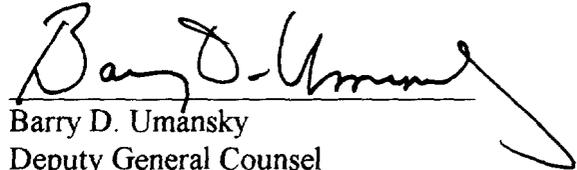
aid these stations but also will serve as a prototype for the kind of relief which may be required by vast numbers of FM operators over the near term.

Respectfully submitted,

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APPENDIX I



Analysis of
Probable Grandfathered 2nd/3rd Adjacent Short-Spaced
Stations

NAB Science and Technology Department

October 4, 1996

Methodology

The list of probable grandfathered 2nd and 3rd adjacent channel short-spaced situations included in this report was generated using a two-step process. These two steps are described below.

1. The FCC FM Engineering Database was downloaded via the Internet on September 6, 1996. A program was written to analyze this database and extract all situations where a pair of 2nd or 3rd adjacent channel stations do not meet the separation requirements in 47 CFR Section 73.209.
2. The stations on the resulting list were then compared with the stations that appear in the *1965 Broadcasting Yearbook*, which lists existing FM stations as of July 1, 1964. All of the stations on the probable grandfathered short-spaced list that did not appear in the *1965 Broadcasting Yearbook*, were “flagged.” Before deleting each flagged station from the probable grandfathered short-spaced list, its on-air date was checked in *Broadcasting & Cable Yearbook 1996*. If a station that was not included in the *1965 Broadcasting Yearbook* appeared in *Broadcasting & Cable Yearbook 1996* with an on-air date that would qualify it for grandfathered status, then its “flag” was removed. All of the remaining flagged stations were then deleted from the probable grandfathered short-spaced list.

Limitations of this Analysis

It is very likely that some of the stations listed in this analysis do not qualify as grandfathered short-spaced stations due to facilities modifications that they have made over the past 32 years. It is possible for a station that qualified for grandfathered status in 1964 to have modified its facilities since then in such a manner that the station still remains short-spaced, but has lost its grandfathered status.

It is also likely that some of the on-air dates that appear in *Broadcasting & Cable Yearbook 1996* are not completely accurate because, in many instances, they are based on information supplied by broadcast licensees who may not know exactly when their stations first went on the air.

A definitive analysis of all grandfathered short-spaced stations would require review of individual station records on file with the Federal Communications Commission. The limited time and resources available to produce this report prevented NAB from providing such a detailed analysis here.

Results

This analysis identified 312 probable grandfathered 2nd/3rd adjacent short-spaced stations. These stations can be grouped by class as follows:

Class A	57
Class B	206
Class B1	2
Class C	44
Class C1	3

TOTAL	312

The stations can also be grouped by state as follows:

AL	2	NH	1
CA	50	NJ	17
CT	6	NY	24
DE	2	NC	25
DC	4	OH	28
FL	2	PA	32
GA	6	RI	4
IL	24	SC	4
IN	6	TN	6
KY	1	TX	5
MD	17	VA	7
MA	15	WV	3
MI	16	WI	5

The "short-spaced situations" can be grouped as follows:

2nd adjacent channel short spacings:	322
3rd adjacent channel short spacings:	138

TOTAL	460*

*NOTE: There are more "short-spaced situations" than there are short-spaced stations because a single station can be involved in more than one short spacing.

**Probable Grandfathered 2nd/3rd Adjacent Short-Spaced
Stations**

Sorted by: State, City, Frequency

State	City	Freq	Class	Call	Licensee
Alabama	Albertville	105.1	C	WQSB	Sand Mountain B/Cting Service Inc
Alabama	Birmingham	104.7	C	WZZK	Newcity Communications of Alabama Inc
California	Alameda	92.7	A	KZSF	KZSF Broadcasting Inc
California	Anaheim	95.9	A	KEZY	Anaheim Radio Associates
California	Arcadia	107.1	A	KLYY	Odyssey Communications Inc
California	Auburn	101.1	B	KHYL	Chancellor Broadcasting Licensee Company
California	Fremont	104.9	A	KBRG	Radio America Inc.
California	Garden Grove	94.3	A	KIKF	K-Orange Broadcasting Corp
California	Inglewood	103.9	A	KACE	KFI Inc.
California	Long Beach	97.9	B	KLAX	Spanish Broadcasting System of Florida Inc
California	Long Beach	105.5	A	KBUE	Lieberman Broadcasting Inc
California	Los Angeles	93.1	B	KCBS	CBS Inc.
California	Los Angeles	93.9	B	KZLA	Shamrock Broadcasting Inc.
California	Los Angeles	94.7	B	KTWV	Group W Radio Inc (LA)
California	Los Angeles	95.5	B	KLOS	American Broadcasting Companies Inc
California	Los Angeles	96.3	B	KFSG	Internat'L Church Foursquare Gospel
California	Los Angeles	97.1	B	KLSX	Greater Los Angeles Radio Inc
California	Los Angeles	98.7	B	KYSR	KXEZ Inc.
California	Los Angeles	102.7	B	KIIS	Pacific & Southern Co Inc.
California	Los Angeles	103.5	B	KOST	KFI Inc.
California	Los Angeles	104.3	B	KBIG	Bonneville Holding Company
California	Los Angeles	105.1	B	KKGO	Mount Wilson FM Broadcasters Inc.
California	Los Angeles	107.5	B	KLVE	KLVE-FM License Corp
California	Newport Beach	103.1	A	KBCD	Brentwood Communications LP
California	Oceanside	102.1	B	KXST	Compass Radio of San Diego Inc.
California	Ontario	93.5	A	KREA	Chagal Broadcasting Inc
California	Pasadena	106.7	B	KROQ	Infinity Broadcasting Corporation of Los Angeles
California	Redondo Beach	93.5	A	KFOX	Chagal Communications Inc
California	Sacramento	100.5	B	KQPT	The Brown Organization
California	Salinas	100.7	B	KTOM	California Broadcasting Co Limited Partnership
California	San Bernardino	95.1	B	KFRG	Amaturo Group Ltd.
California	San Diego	101.5	B	KGBF	KGB Incorporated
California	San Fernando	94.3	A	KYKF	Chagal Broadcasting Inc
California	San Francisco	93.3	B	KYCY	Infinity Broadcasting Corporation of San Francisco
California	San Francisco	101.3	B	KIOI	Evergreen Media Corporation of the Bay Area
California	San Francisco	104.5	B	KFOG	Radio San Francisco Inc
California	San Francisco	105.3	B	KITS	Entertainment Communications Inc.
California	San Francisco	106.1	B	KMEL	Evergreen Media Corporation
California	San Francisco	106.9	B	KEAR	Family Stations Inc.
California	San Jose	98.5	B	KOME	The Audio House Inc.
California	San Jose	100.3	B	KBAY	United Broadcasting Company
California	San Jose	106.5	B	KEZR	Alta Broadcasting Company
California	San Mateo	107.7	B	KYLD	GCC Radio Inc
California	San Rafael	100.9	A	KKHI	Marin Broadcasting Co Inc.

State	City	Freq	Class	Call	Licensee
California	Santa Ana	96.7	A	KWIZ	Liberman Broadcasting Inc.
California	Santa Ana	106.3	A	KALI	KALI-FM Inc
California	Santa Clara	105.7	B	KARA	Santa Clara Broadcasters Inc.
California	Santa Cruz	99.1	B	KZOL	TMS License California Inc
California	Santa Monica	103.1	A	KACD	KACD-FM LP
California	Stockton	107.3	B	KSTN	Valley Broadcasters Inc
California	Walnut Creek	92.1	A	KZWC	Diamond Broadcasting of California Inc.
California	West Covina	98.3	A	KRTO	El Dorado 983 Inc
Connecticut	Bridgeport	99.9	B	WEZN	Newcity Communications of CT Inc.
Connecticut	Brookfield	95.1	B	WRKI	Danbury Broadcasting Inc.
Connecticut	Hartford	93.7	B	WZMX	American Radio Systems License Corp.
Connecticut	Hartford-Meriden	95.7	B	WKSS	Precision Media Limited Partnership
Connecticut	New Haven	94.3	A	WYBC	Yale Broadcasting Co Inc
Connecticut	Stamford	96.7	A	WKHL	Chase Broadcasting of Stamford Inc
Delaware	Wilmington	93.7	B	WSTW	Delmarva Broadcasting Company
Delaware	Wilmington	99.5	B	WJBR	CRB Broadcasting of Delaware Inc.
District of Colu	Washington	96.3	B	WHUR	The Howard University
District of Colu	Washington	99.5	B	WGAY	Greater Washington Radio Inc.
District of Colu	Washington	101.1	B	WWDC	Capitol Broadcasting Company A MD Ltd Partnershi
District of Colu	Washington	107.3	B	WRQX	WMAL Inc
Florida	Miami	97.3	C	WFLC	WIOD Inc.
Florida	Palm Beach	97.9	C	WRMF	Fairbanks Communications Inc
Georgia	Athens	95.5	C	WNGC	Clake Broadcasting Corporation
Georgia	Atlanta	94.9	C	WPCH	Jacor Broadcasting of Atlanta Inc.
Georgia	Atlanta	96.1	C	WKLS	Great American TV & Radio Co Inc
Georgia	Gainesville	106.7	C	WYAY	Newcity Comms of Atlanta Inc.
Georgia	Peachtree City	96.7	A	WMKJ	South Metro Broadcasting Co Inc.
Georgia	Toccoa	106.1	C	WLET	Sonic Broadcasting Limited Partnership - Fund I
Illinois	Arlington Heights	92.7	A	WCBR	Darrel Peters Productions Inc
Illinois	Aurora	95.9	A	WKKD	WKKD Inc
Illinois	Aurora	107.9	B	WYSY	WCKG Inc.
Illinois	Champaign	97.5	B	WHMS	DWS Inc
Illinois	Chicago	93.1	B	WXRT	Windy City Broadcasting Inc.
Illinois	Chicago	93.9	B	WLIT	Viacom Broadcasting Inc.
Illinois	Chicago	94.7	B	WKXK	WLS-FM Radio Inc.
Illinois	Chicago	95.5	B	WNUA	Pyramid West Associates Limited Partnership
Illinois	Chicago	96.3	B	WBBM	CBS Inc.
Illinois	Chicago	97.1	B	WNIB	Northern Illinois B/Cing Co Inc
Illinois	Chicago	99.5	B	WUSN	Infinity Broadcasting Corporation of Chicago
Illinois	Chicago	100.3	B	WPNT	Century Chicago Broadcasting
Illinois	Crete	102.3	A	WEMG	Word of Faith Fellowship Inc.
Illinois	Elgin	94.3	A	WJKL	Elgin Broadcasting Company Inc
Illinois	Highland Park	103.1	A	WVVX	WVVX Inc
Illinois	Joliet	93.5	A	WJTW	Barden Broadcasting Inc