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

JAN 21 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In re Applications of)
)
Martin W. Hoffman,)
Trustee-in-Bankruptcy for Astroline) File No. BRCT-881201LG
Communications Company Limited)
Partnership)

For Renewal of License of)
Station WHCT-TV, Hartford, Connecticut)

and)

Astroline Communications Company)
Limited Partnership,)
Proposed Assignor)

and)

Two If By Sea Broadcasting Corporation)
Proposed Assignee)

For Consent to the Assignment of)
License of Station WHCT-TV,)
Hartford, Connecticut)

SHURBERG BROADCASTING OF HARTFORD) File No. BPCT-831202KF

For Construction Permit)

Ref. Rm. 239

TO: The Commission

RESPONSE OF SHURBERG BROADCASTING OF HARTFORD

1. Alan Shurberg d/b/a Shurberg Broadcasting of Hartford ("SBH") hereby responds to the letter filed on January 13, 1997 in the above-captioned proceeding on behalf of Two If By Sea Broadcasting Corporation ("TIBS").

2. In its December 27, 1996 Opposition to TIBS's initial request, SBH noted (in a footnote to the title of its pleading) that the instant proceeding is subject to the Commission's ex

parte rules. However, it has come to SBH's attention -- through remarks made to the Bankruptcy Court in Hartford by counsel for Martin W. Hoffman during a hearing on December 31, 1996 ^{1/} -- that ex parte communications have apparently occurred between Mr. Hoffman (or his representative) and at least one decision-making official of the Mass Media Bureau. In view of this, SBH submits that, until appropriate investigation is made into the ex parte communication(s) to determine the nature and extent of such communications and the identity of the person(s) involved, the Bureau should be recused from any involvement in the decision-making process. See, e.g., Press Broadcasting Company, Inc. v. FCC, 59 F.3d 1365 (D.C. Cir. 1995). Pursuant to Section 1.1214 of the Commission's Rules, a copy of the instant response is being served on the Office of the Managing Director.

3. SBH believes it important to note the complete lack of equity which characterizes TIBS's last-minute request for "emergency" (to use TIBS's own characterization) relief. TIBS claims that a "conscientious agency" should be able to act on TIBS's request "within days". TIBS's letter at 2. Perhaps so. But if that is indeed the case, why hasn't that same "conscientious agency" acted on any of SBH's requests for action over the last four-five years? SBH is entitled to the same

^{1/} SBH has obtained from the Clerk of the Bankruptcy Court a copy of the tape recording of the December 31 hearing. A copy will be made available to the Commission on request. In that tape, counsel for Mr. Hoffman advises the Bankruptcy Judge of at least one conversation which has occurred between Mr. Hoffman (or his representative) and Clay Pendarvis, Chief of the Television Branch.

promptness of response as is any other party to any Commission proceeding. It would be arbitrary and capricious for the Commission to accord TIBS, in effect, same day service, when the Commission has simply ignored SBH's repeated efforts, over the last four-five years, to obtain Commission action. ^{2/}

4. This is especially true in view of the fact that the circumstances underlying and supposedly justifying TIBS's claim of urgency are purely of TIBS's own making. Had TIBS heeded any of the Commission's clearly-articulated public notices advising potentially affected entities of the importance of the February 9, 1997 deadline, TIBS could and should have taken appropriate, timely steps to bring its situation to the Commission's attention. Had it done so, no need for immediate "emergency" relief would have existed. Since it is TIBS's own fault that the matter was not raised until the eleventh hour (or later), TIBS cannot legitimately claim that it is entitled to any equities at all here.

^{2/} And this assumes that TIBS is the correct party to be seeking "emergency" relief here. After all, the licensee is still the trustee in bankruptcy for Astroline Communications Company Limited Partnership ("Astroline"). Any concern about preserving the license, recommencing operation, or benefiting the Astroline estate should be coming from the trustee. And yet, to date the trustee has not sought any relief, "emergency" or otherwise. Instead, we have TIBS, which appears to be asserting some kind of right to immediate authorization to operate, even though no such right in fact exists -- at most, TIBS holds some potential opportunity arising from its agreement with the trustee in bankruptcy. But TIBS entered into that agreement fully aware of the pendency of SBH's application and the underlying Commission processes relative to such comparative renewal situations, and TIBS cannot legitimately be said to be entitled to any special consideration simply because those processes have not worked out as TIBS might have preferred.

5. TIBS's claims about the "bare license" argument highlight this point. Let's review the history of that argument. It appears to be conceded by one and all that, by early 1993, Mr. Hoffman had assigned away all of the tangible assets of the estate of Astroline Communications Company Limited Partnership ("Astroline"). Those assets were not assigned to any one entity, but rather to a number of unrelated entities -- basically, the station's hard assets were scattered to the winds -- leaving Mr. Hoffman with only the Commission-issued licenses. That is the essence of a "bare license" situation, and in such a situation the licensee (whether or not the licensee happens to be a trustee in bankruptcy) is prohibited from selling the license. E.g., Donald L. Horton, 11 R.R.2d 417 (1967); Bonanza Broadcasting Corp., 11 R.R.2d 1072 (1967); Radio Station KDAN, Inc., 12 R.R.2d 584 (1968); E. Al Robinson, 33 R.R.2d 593 (1975)

6. SBH raised this point in 1992 and 1993. No rebuttal at all was ever submitted to the Commission on this point by Mr. Hoffman.

7. In late 1993, Mr. Hoffman proposed the assignment of the license to TIBS. The proposed assignment did not include anything but the bare license. SBH opposed the application based on, inter alia, the "bare license" argument. The most that TIBS could claim was that TIBS thought that it had some kind of leasehold interest in the equipment which was disputed and in litigation, and TIBS was in the process of negotiating to resolve the problem. See TIBS's Response to SBH's Petition to Dismiss or

Deny Application, filed January 10, 1994. ^{3/}

8. That was all the Commission heard from TIBS on that point from January, 1994 until December, 1996, a period of two years. Then, in its "emergency" request, TIBS claimed that it had in fact secured access to Astroline's former transmitter site. In support of that claim, TIBS submitted a "Stipulation" entered into by TIBS and Astroline Connecticut, Inc. on April 13, 1995. ^{4/} On its face, TIBS's reliance on the "Stipulation" reflects a concession that, even if the "Stipulation" afforded TIBS access to the site as TIBS claimed, TIBS had not obtained that access until April, 1995, more than 18 months after TIBS filed its assignment application and more than 15 months after SBH had challenged that application on "bare license" grounds. In other words, SBH's "bare license" argument was in any event plainly unanswerable by either Mr. Hoffman or TIBS from 1992 (when SBH first raised it) until at least April, 1995.

^{3/} Contrary to TIBS's claim that it had obtained some sort of lease to the transmitter site, SBH demonstrated (and as has been conclusively established by subsequent events) that the trustee had no such lease to assign, so contrary to TIBS's claim, TIBS could receive nothing but the license from the trustee. As TIBS itself has since demonstrated, it was not until April, 1995, that TIBS obtained not a lease, but an opportunity to obtain a lease to the transmitter site, an opportunity which would be available to TIBS no less than 90 days after Commission grant of TIBS's assignment application. That cannot be said to be a "lease" in any meaningful sense. And in any event, that arrangement became moot in December, 1995, when the other party thereto sold the site in question.

^{4/} If the "Stipulation" really was TIBS's answer to the "bare license" argument, it is not clear why TIBS did not submit it to the Commission in, say, May, 1995, as Section 1.65 of the Commission's Rules requires. TIBS has offered no explanation on that score.

9. And let's look at the terms of the "Stipulation" itself. Again, this is the document on which TIBS was placing sole reliance in its December, 1996 "emergency" request. The "Stipulation" specifically provides that, if a lease for the transmitter site were to be entered into,

the initial lease term . . . shall commence on a date the longer of 90 days after the FCC issues the right to broadcast or when the materials required for [TIBS's] transmitting facilities are delivered and installed. . .

In other words, any lease which might have arisen from the terms of the "Stipulation" would not have commenced until (at the very earliest) 90 days after Commission authorization to TIBS. So even if the Commission had granted TIBS authority to acquire Station WHCT-TV on January 1, 1997, under the terms of the "Stipulation" TIBS would not have had any lease until April 1, 1997, at the earliest.^{5/} Thus, the "Stipulation" on which TIBS sought to rely in its December 12, 1997 letter request did not help it at all.

10. And then there's the problem of exactly who owns the transmitter site. Now recall, TIBS came into the Commission in December, 1996, demanding emergency relief and asserting that TIBS had access to a transmitter site. But not only did TIBS not

^{5/} In its January 13, 1997 letter TIBS responded to this argument by saying that the "Stipulation" "simply deferred when TIBS' rent payments would begin". TIBS letter at 3. That's just wrong. As quoted in the text above, the "Stipulation" plainly provides that "the initial lease term" of any site lease entered into pursuant to the "Stipulation" would not "commence" until 90 days after Commission authorization. As SBH understands conventional contract principles, a party's rights under a lease do not arise until the commencement of the lease term.

have the access it was claiming (as discussed above), it failed to mention that the site was not even owned anymore by the other party to the "Stipulation" on which TIBS was placing exclusive reliance. How can TIBS claim that it is entitled to "emergency" relief when it didn't know, or at least failed to disclose, that the source of its supposed access to the site was not a valid source and had not been a valid source for a year? In its January 13, 1997 letter, TIBS neglects to address that point in any way at all.

11. Instead, TIBS now relies on documents which it asserts constitute a current lease for the site. But those documents were not executed until January 10, 1997! Where is the diligence in that?

12. And, while the supposedly new and improved January, 1997 documents purport to reflect a lease for tower space and an antenna and associated antenna line, those documents, even if taken as completely reliable (and, in light of TIBS's demonstrated unreliability, the validity of TIBS's most recent showing cannot be taken for granted ^{5/}), still fall short of

^{5/} With respect to the validity of TIBS's newly-generated documents, SBH also reminds the Commission that, as demonstrated by SBH in its December 27, 1996 pleading, TIBS is not, and has not for at least two years been, a corporation at all under the laws of Delaware. Oddly, TIBS did not even bother to mention that fact in its January 13, 1997 letter, much less dispute it. SBH has confirmed with state officials in Delaware that as of January 17, 1997, no effort had been made to seek to reinstate its corporate status.

In view of the fact that TIBS apparently does not really exist, any supposedly "legal" agreement which may have been entered into by TIBS as a corporation cannot be deemed to be valid and binding, and the Commission cannot as a result rely on any such supposed agreement.

what is needed to operate a broadcast station. Where, for instance, is the studio space? As SBH indicated in its December 27, 1996 opposition, the studio space originally utilized by Station WHCT-TV is apparently being utilized by another broadcast station and is thus unavailable to TIBS. TIBS has not bothered to respond to that problem, despite the fact that studio space is a necessary component of a television broadcast facility. And, indeed, where is the programming TIBS intends to air? An even more essential element of a television operation is programming - - and yet, TIBS has offered no indication of what, if any, arrangements it may have made for programming. ^{1/}

13. In summary, despite TIBS' current claims that it is in

^{1/} The lack of local studio facilities may indicate that TIBS intends to do with Station WHCT-TV what TIBS (and its owner, Micheal Parker) are doing with at least two other stations they own: provide the station's airtime, 24-hours a day, seven days a week, to Faith Center, Inc. and/or Gene Scott for their use. See Attachment A hereto (copy of station listing reflecting full-time programming service featuring Gene Scott on International Shortwave Station KAIJ, Dallas, Texas and Television Station KVDM(TV), Twentynine Palms, California, both of which are licensed to entities controlled by Mr. Parker). Mr. Parker's apparent dedication to Mr. Scott is consistent with information contained in an article which appeared (according to information obtained on the internet) in the Los Angeles Times on July 10, 1994:

"[Gene Scott] can do anything he wants with the contributions I send him," allows Mike Parker, the former mayor of Tacoma, Wash., who has been watching Scott for a decade and donates weekly.

It would indeed be a tragic irony if Faith Center were to return to the airwaves on Station WHCT-TV. This whole proceeding began more than 16 years ago with the designation of Faith Center's renewal application for that very station for hearing on disqualification issues. Bringing Faith Center back to the air on Channel 18 in Hartford, complete with its band of musical wind-up monkeys named after Commission personnel, would bring the Commission full circle.

a position to commence operation, the fact is that TIBS has previously represented the same thing, only to be forced to back-track when SBH was able to demonstrate that, for example, the entity from which TIBS claimed its access to the site had not even owned the site for a year prior to TIBS's claim to the Commission. Any claim TIBS might make now must be taken with more than a grain of salt. And even if TIBS's current claim about access to the site were to be correct, the fact is that TIBS still has not demonstrated to the Commission that TIBS has anything but that access -- where are the studios, where is the programming? TIBS offers no evidence at all that any of those are available.

14. Under these circumstances, the Commission's longstanding "bare license" policy remains a bar to the grant of TIBS's application.

15. TIBS also claims that the Commission can and should ignore the fact that the Station WHCT-TV license was originally issued to Astroline as a result of blatant fraud not only on the Commission, but also on the Court of Appeals and the Supreme Court. But as the Supreme Court has held,

tampering with the administration of justice [through fraud] involves far more than an injury to a single litigant. It is a wrong against the institutions set up to protect and safeguard the public, institutions in which fraud cannot complacently be tolerated consistently with the good order of society. . . . The public welfare demands that the agencies of public justice be not so impotent that they must always be mute and helpless victims of deception and fraud.

Hazel-Atlas Glass Co. v. Hartford-Empire Co., 322 U.S. 238, 246 (1944). The Commission cannot turn a blind eye to Astroline's

fraud without establishing for all future cases a precedent that fraud on the agency is plainly acceptable as long as the perpetrator is able to sneak it past the agency in the first instance. For its part, the Commission has already acknowledged the seriousness of SBH's allegations in the Commission's Opposition to SBH's Petition for Recall of Mandate filed with the U.S. Court of Appeals for the District of Columbia Circuit on January 17, 1997, and has clearly indicated that any resolution of this proceeding will depend on resolution of those allegations. Commission Opposition to Petition for Recall of Mandate at 3. ^{2/} Thus, on this point TIBS is unquestionably wrong.

16. TIBS claims that SBH has not demonstrated that fraud occurred in connection with Astroline's initial acquisition of the license. TIBS January 13, 1997 letter at 3. But that acquisition was initially granted, and then stalwartly defended by the Commission through the Supreme Court's action in 1990, on the basis of the claim that Astroline satisfied the standards for a "minority-controlled" entity, standards which included at least 20% controlling ownership by a minority person. But SBH has demonstrated that, by the end of 1985 (i.e., long before the grant of Astroline's initial acquisition became final and, indeed, even before oral argument in the Court of Appeals), the

^{2/} SBH assumes that the Commission's staffmembers who are presently working on this matter are aware of the position taken by the Commission in its January 17, 1997 pleading to the Court of Appeals. If those staffmembers do not have a copy of that pleading, SBH would be happy to make one available.

supposedly controlling minority owner of Astroline held only 0.75% of Astroline (according to Astroline's own tax returns).

17. TIBS also repeatedly urges the Commission to defer consideration of the hard questions which SBH has raised until some later time, when there might be a renewal hearing involving SBH's application. But such an approach -- i.e., a grant of an assignment application while action on a competing application is held in abeyance -- would be completely unprecedented. The Commission's standard approach in such situations is NOT to grant any of the applications. Rather, the most the Commission has done has been to put all applications in hearing, with the ultimate disposition of the applications (including, in particular, the assignment application) dependent on the outcome of the hearing. E.g., Arthur A. Cirilli, Trustee in Bankruptcy, 2 FCC 2d 692, 6 R.R.2d 903 (1966); Northwest Broadcasters, Inc., 3 FCC 2d 571, 7 R.R.2d 396 (1966); Bennett Gilbert Gaines, 5 FCC Rcd 2052 (Audio Services Division 1990). Under the circumstances presented by this case, SBH's application could be granted because the renewal and assignment applications may be dismissed, without hearing, for multiple reasons previously presented by SBH. But the converse is not true: under no circumstances could the TIBS assignment application be granted prior to a full evidentiary hearing. Id.

18. TIBS attempts to depict its proposed approach as a common and well-established notion. The fact is that that is simply not true. TIBS has not cited, nor is SBH aware of, any decision in which the Commission (or the Bureau, for that matter)

has granted an assignment application under the particular circumstances presented here. While TIBS seeks to mischaracterize the issue ^{2/}, the facts are the facts: this case involves (a) a renewal application with respect to which a competing application was timely filed and accepted for filing, and (b) an assignment application filed after the acceptance of the competing application, an assignment application which involves serious qualification questions relative to both the incumbent renewal applicant and the proposed assignee. In such cases, the Commission's invariable procedure has been to withhold action on the assignment application until the completion of a comparative hearing. Id.

19. The only time that any different procedure has been discussed by the Commission was in Stockholders of CBS, 11 FCC Rcd 3733, 3748 (1995), where the Commission expressed a willingness to act on an assignment application, notwithstanding the pendency of a renewal application and a competing application, but only when

the renewal applicant for a single station has been challenged by a competing applicant, is the licensee of several broadcast stations, and seeks to sell all of its stations to a third party.

Here, the renewal applicant is not the licensee of several broadcast stations, and it does not seek to sell more than the one station in question. Thus, this case does not come close to fitting within the very narrow limits established by the

^{2/} See, e.g., TIBS January 13, 1997 letter at 6 ("The issue is whether an assignment application can be granted when a renewal application is pending.")

Commission in Stockholders of CBS for situations in which pre-comparative hearing grant of an assignment of a contested license would be permitted.

20. In other words, contrary to TIBS's facile (and inaccurate) assertions, there is no precedent which supports the "emergency" relief which it now seeks. Rather, the very few times the Commission has been confronted with fact patterns similar to this one, the Commission (and the Bureau) have withheld action on the pending assignment application. Cirilli; Northwest Broadcasters; Gaines. And, again contrary to TIBS's self-serving claims, any decision running counter to the overwhelming weight of precedent would have to be reached in the first instance by the full Commission itself, and not the Bureau. The Bureau does not have delegated authority to establish new rules and policies which run counter to the Commission's own decisions. ^{10/}

21. TIBS also attempts to belittle a number of serious matters raised by SBH. For example, there is the matter of Mr. Hoffman's failure to pay the required hearing fee in 1991. ^{11/} While TIBS says that the full Commission has rejected

^{10/} With respect to the Bureau's delegated authority, TIBS also makes the surprising argument that TIBS's request does not seek "emergency authority" and, thus, that Bureau action is not precluded by Section 0.283(a)(14)(i). In view of the fact that TIBS itself has chosen to characterize its request (repeatedly) as one seeking "emergency" relief, it is difficult to take this argument seriously.

^{11/} TIBS seems to characterize this as a "new contention". See TIBS January 13, 1997 letter at 4. But SBH first raised this "new contention" in August, 1991, more than five years ago. It is not clear why TIBS thinks this might be a "new contention".

that argument, that's news to SBH. The way in which an agency resolves arguments presented to it is by acting on those arguments. SBH has had pending before the full Commission for almost four years already an application for review relative to the fee matter. The Commission has thus far failed to act on that application for review. Of course, the Bureau itself cannot purport to act on the application for review, as the Bureau does not have the delegated authority to do so. See Section 0.283(b)(3); 47 U.S.C. §5(c)(4).

22. TIBS similarly poo-poo's SBH's assertion that the plain Congressional language of Section 312(g) of the Communications Act compels a conclusion that Station WHCT-TV's license expired long ago. But, as SBH has argued, Congress' language (referring to "any consecutive 12-month period") is, on its face, clear and unambiguous. Moreover, contrary to TIBS's claim, the Commission's own position relative to Section 312(g) was that the inclusion of pre-enactment silence for purposes of that provision would not necessarily be retroactive. Silent Station Authorizations, 3 C.R. 109, 110 (1996).

23. TIBS also renews its odd assertion that an application in which it is the proposed assignee can be granted summarily, without regard to questions concerning TIBS's own qualifications. Such action would, of course, be inconsistent with the Communications Act, see 47 U.S.C. §309. TIBS seems to think that SBH has somehow waived any arguments against TIBS. TIBS is mistaken in that regard. In its earlier pleadings in opposition to the TIBS assignment application, SBH -- knowing full well the

Commission's well-established procedure, discussed above, of withholding grant of an assignment until after a comparative hearing -- acknowledged that, under that procedure, it might be premature for SBH to weigh in prior to designation with a full presentation of the basic qualifications questions relating to TIBS (although, to be sure, SBH clearly alerted the Commission to the existence of those questions).

24. Now, TIBS is seeking to avoid the Commission's well-established procedure, while nonetheless shielding itself from those basic qualifications questions as if the procedure were still in place. TIBS appears to be telling the Commission that TIBS is qualified to be an assignee and that the Commission can go ahead and grant its application now, and if it turns out that there really are questions about its qualifications, well, those questions can be addressed somewhere down the line, long after TIBS's assignment application has been granted. But that's not the way the Communications Act requires that things be done. Before the Commission can act on an application, the Commission must assess the qualifications of the parties to that application. Here, if TIBS wants its assignment application acted on now, before any comparative hearing, then TIBS must submit itself and its own qualifications for Commission scrutiny. The mere fact that TIBS is seeking to avoid just such scrutiny through invocation of bizarre and unprecedented procedures should give the Commission some clear indication that

scrutiny is warranted. ^{12/}

25. In sum, then, the arguments which SBH presented to the Commission on December 27, 1996 remain compelling, while TIBS's continued efforts to convince the Commission to contort and distort its procedures and standards to TIBS's benefit are unavailing. The fact is that it is far too late in the day, and this case is now (and has for some time) been far too complicated, and the assignment application is subject to too many unanswered questions, to grant to TIBS the extraordinary relief it now seeks.

26. While SBH joins TIBS in its stated concern about returning Channel 18 to operation in Hartford, SBH is constrained to observe -- as it has repeatedly observed over the last five-plus years -- that that goal could easily be achieved, consistently with all applicable substantive and procedural rules and policies, by simply rejecting the pending license renewal application and granting SBH's competing application, which is the only other timely-filed, accepted-for-filing application

^{12/} Needless to say, TIBS has never bothered to provide any substantive explanation for the misconduct which has been noted both by the Commission (in Mt. Baker Broadcasting Co., Inc., 3 FCC Rcd 4777 (1988)) and by the Review Board (in Religious Broadcasting Network, 3 FCC Rcd 4085, 4090, ¶16 (Rev. Bd. 1988)). Nor has TIBS explained exactly how its less-than-complete and less-than-forthcoming statements in subsequent applications could have been deemed to place the Commission's processing staff on notice of the details of those earlier decisions. The Commission must (and does) depend on the total candor and forthrightness of its applicants. If an applicant chooses to be less than candid, that applicant cannot subsequently contend that the Commission's reliance on the less-than-candid responses somehow estops the Commission from inquiring into those matters once they are fully disclosed. While TIBS seems intent upon advancing some such estoppel theory, that effort cannot succeed.

still pending for the channel. Ample, fully sustainable grounds for such an approach have existed at least since July, 1991. SBH urges the Commission, once again, to act consistently with the Commission's own precedents, due process, fairness and the public interest: deny TIBS's request for emergency relief, reject the renewal application of Station WHCT-TV, dismiss the assignment application, and grant SBH's application.

Respectfully submitted,


/s/ Harry J. Cole
Harry J. Cole

Bechtel & Cole, Chartered
1901 L Street, N.W.
Suite 250
Washington, D.C. 20036
(202) 833-4190

Counsel for Alan Shurberg d/b/a
Shurberg Broadcasting of Hartford

January 21, 1997

ATTACHMENT A

STATIONS CARRYING DR. GENE SCOTT'S PROGRAMS

Below is a listing of the broadcast stations carrying "The University Network Presents Dr. Gene Scott." Times and frequencies given below are subject to change; call toll-free 1-800-338-3030 (in the USA) or 1-818-246-8151 collect from anywhere in the world for the latest time and frequency information.

SATELLITES

24 HOURS A DAY - 7 DAYS A WEEK

- GALAXY 6: Channel 19 74.2° West
 - STATIONAR 11 Transponder 11 11° West
 - STATIONAR 21 Transponder 11 103° East
-
-

SHORTWAVE RADIO

WWCR

Nashville, Tennessee - USA; *24 hours a day - 7 days a week!*

- 5935 KHz, from 4pm to 5am California Time (0000-1300 UTC)
 - 13845 KHz, from 5am to 4pm California Time (1300-0000 UTC)
-
-

KAIJ

Dallas, Texas - USA; *24 hours a day - 7 days a week*

- 13815 KHz, from 6am to 4pm California Time (1400-0000 UTC)
 - 5810 KHz, from 4pm to 6am California Time (0000-1400 UTC)
 - 15725 KHz, from 6am to 2pm California Time (1400-2200 UTC)
 - 13740 KHz, from 3pm to 5pm California Time (2300-0000 UTC)
 - 9815 KHz, from 6pm to 5am California Time (0200-1300 UTC)
-
-

RADIO MOSCOW

24 hours ad ay - 7 days a week

Novosibirsk

- 12065 KHz, from 7pm to 2am California Time (0300-1000 UTC)
- 12050 KHz, from 2am to 8am California Time (1000-1600 UTC)

Krasnodar

- 13645 KHz, from 7pm to 11am California Time (0300-0700 UTC)

Samara

- 17600 KHz, from 11am to 2pm California Time (0700-1000 UTC)
- 9860 KHz, from 2am to 8am California Time (1000-1600 UTC)

HIGH ADVENTURE

Mt Hermon, Israel. Dr. Scott can be heard on the following frequencies:
9960 KHz SW, 6280 KHz SW, 945 KHz AM, 104.5 MHz FM, 105.1 MHz FM

SWAZI RADIO

Swaziland, Southern Africa

- 6155 KHz SW, from 8pm to 12am California Time (0300-0700 UTC)
- 1377 KHz AM, from 8pm to 12am California Time

THE CARIBBEAN BEACON

Anguilla, British West Indies; *24 hours a day - 7 days a week*

- 690 KHz AM
- 1610 KHz AM
- 100.1 MHz FM

TELEVISION INFORMATION

for Southern California viewers

WORLD TELEVISION

7 days a week from 9 pm to 11 pm, and from 1 am to 4 am

Sunday Services 11 am to 1 pm

- Channel 38** - West Los Angeles and San Bernardino
- Channel 24** - San Fernando Valley
- Channel 63** - San Diego

CENTURY CABLE

West Los Angeles area; **Wednesdays & Thursdays**, 10 pm - 11 pm

CHARTER CABLE

Pasadena, Riverside & San Gabriel Valley areas; **Wednesdays & Thursdays**, 10 pm - 11 pm

KDOC

Channel 56, Orange County (carried by most cable companies); **Sundays**, 2 pm - 4:30 pm

KVMD

Channel 31, California Desert areas; **7 days a week, 24 hours a day!**



Last Update: 12/19/96

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CERTIFICATE OF SERVICE

I hereby certify that, on this 21st day of January, 1997, I caused copies of the foregoing "Response of Shurberg Broadcasting of Hartford" to be placed in the U.S. Postal Service, first class postage prepaid, or hand delivered (as indicated below), addressed to the following:

Chairman Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W. - Room 814
Washington, D.C. 20554
(BY HAND)

Commissioner James H. Quello
Federal Communications Commission
1919 M Street, N.W. - Room 802
Washington, D.C. 20554
(BY HAND)

Commissioner Rachelle B. Chong
Federal Communications Commission
1919 M Street, N.W. - Room 844
Washington, D.C. 20554
(BY HAND)

Commissioner Susan Ness
Federal Communications Commission
1919 M Street, N.W. - Room 832
Washington, D.C. 20554
(BY HAND)

Daniel M. Armstrong,
Associate General Counsel
Federal Communications Commission
1919 M Street, N.W. - Room 602
Washington, D.C. 20554
(BY HAND)

Andrew S. Fishel
Managing Director
Federal Communications Commission
1919 M Street, N.W. - Room 852
Washington, D.C. 20554
(BY HAND)

Roy J. Stewart, Chief
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W. - Room 314
Washington, D.C. 20554
(BY HAND)

Barbara A. Kreisman, Chief
Video Services Division
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W. - Room 702
Washington, D.C. 20554
(BY HAND)

Clay Pendarvis, Chief
Television Branch, Video Services
Division
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W. - Room 700
Washington, D.C. 20554
(BY HAND)

Martin Hoffman, Esquire
50 Columbus Boulevard
Hartford, Connecticut 06106
Trustee-in-Bankruptcy for
Astroline Communications Company
Limited Partnership

Howard A. Topel, Esquire
Mullin, Rhyne, Emmons & Topel
1225 Connecticut Avenue, N.W.
Suite 300
Washington, D.C. 20036-2604
Counsel for Two If By Sea,
Broadcasting Corporation


/s/ Harry F. Cole
Harry F. Cole