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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In re:)
)
 GERARD A. TURRO)
)
 For Renewal of License)
 for FM Translator Stations)
 W276AQ(FM), Fort Lee, NJ, and)
 W232AL(FM), Pomona, NY)
)
 MONTICELLO MOUNTAINTOP)
 BROADCASTING, INC.)
)
 Order to Show Cause Why the Construction)
 Permit for FM Radio Station WJUX(FM),)
 Monticello, NY, Should Not Be Revoked)

MM Docket No. 97-122
 File Nos. BRFT-970129YC
 BRFT-970129YD

To: Mass Media Bureau, for Serge Loginow, Jr.

FIRST SET OF INTERROGATORIES OF
 MONTICELLO MOUNTAINTOP BROADCASTING, INC.
 TO MASS MEDIA BUREAU,
FOR ANSWER BY SERGE LOGINOW, JR.

Monticello Mountaintop Broadcasting, Inc. ("MMBI"), by its attorneys, hereby propounds interrogatories, pursuant to Sections 1.311(b)(2) and 1.323 of the Commission's rules, to the Mass Media Bureau, a party, to be answered by Serge Loginow, Jr. ("Loginow"), an FCC employee.

There is pending before the Commission a request that examination of Loginow on oral deposition be permitted. The serving of these interrogatories is in no way to be

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Federal Communications Commission
 Docket No. 97-122 Exhibit No. MMB-19
 Presented by fcc
 Disposition { Identified ✓
 Received ✓
 Rejected _____

interpreted as a lessening of MMBI's support of that request or of MMBI's firm belief that only an oral deposition of Loginow will allow for necessary and adequate pre-trial discovery. These interrogatories are served as a precaution, notwithstanding MMBI's belief that examination of Loginow by written interrogatory will provide inadequate pre-trial discovery.

These interrogatories are explicitly directed to the Bureau for answer by Loginow, the answers to be signed by Loginow, for these reasons:

1. Section 1.311(b)(2) states that interrogatories shall be served on the appropriate Bureau chief (here, the Mass Media Bureau, the Bureau party to this case), and then states that the interrogatories "will be answered and signed by those personnel with knowledge of the facts."
2. The Bureau has, in answering interrogatories served by Gerard Turro, identified Loginow as the only member of the FCC's staff who has knowledge concerning the issues in this case. See, e.g., Bureau's June 6, 1997, Response to Turro Interrogatories at p. 2, interrogatory 3, p. 7, interrogatory 20, p. 10, interrogatory 30, and p. 11, interrogatory 36. Moreover, the interrogatories set forth below are specifically intended to elicit information concerning Loginow's actions, observations, and reports.
3. In responding to prior interrogatories, the Bureau's answers have, contrary to the express signing requirement of Section 1.311(b)(2), been signed by trial counsel for the Bureau, notwithstanding that trial counsel have not claimed in the Bureau's answers to have knowledge of the matters under inquiry.

4. Finally, in its opposition to the petition for authority to take Loginow's deposition, the Bureau said to the Commission that "there is no apparent reason that the parties could not direct those written interrogatories to Mr. Loginow" The interrogatories below are directed to Loginow. Thus, where an interrogatory is posed to "you" (e.g., "did you talk with Mr. Blabey") the "you" is Loginow.

INSTRUCTIONS

1. Provide the fullest possible answer to each interrogatory. Several of the interrogatories ask about conversations you may have had. Do not summarize recollections of conversations. Provide as complete an accounting of the conversation, repeating the words actually used in the conversation, that recollection allows.

2. Each interrogatory is continuing in nature. Should you recall additional information responsive to an interrogatory, or learn additional information, after answers have been served, the answers should be supplemented. It will be anticipated that your testimony at hearing will not differ materially from your answers, with respect to materially similar inquiries, as given to these interrogatories.

3. If an interrogatory answer refers to a document, identify the document as fully as possible, including:

- A. The writer or creator of the document.
- B. The recipient(s).
- C. The exact or approximate date.
- D. The present location of the document and the identity of its custodian.

If it cannot be located, the identity of its last custodian.

E. If destroyed, the exact or approximate date of destruction of the document, the reason for its destruction, and its last known custodian. "Document" includes, whether original or copy, any memo, letter, note, diagram, map, certificate or any other record, whether on paper or electronically recorded or stored in computer media, e-mail, audio or video tape, formal or informal, handwritten, typewritten, photographic or other.

4. If an answer to an interrogatory requires that you provide a description, whether of a person, a location, an object or building, a document or an action, provide a full description. Do not say, for example, merely that an object "was located along a wall"; instead, indicate which wall (north, south, east or west, or left or right if with reference to some other known point).

5. If an interrogatory refers to a "proceeding", that term, unless otherwise indicated in the interrogatory, means the FCC proceedings in MM Docket 97-122 and matters, including inspections, investigations, complaints and correspondence, which preceded the release, on April 18, 1997, of the Hearing Designation Order, Order to Show Cause and Notice of Opportunity for Hearing in MM Docket 97-122.

INTERROGATORIES

1. During what years have you been employed by the FCC?

2. What educational background (*i.e.*, college, technical school, etc.) do you have?

Provide names of institutions, years attended, and degrees or diplomas received.

3. Other than your work for the FCC, what work experience do you have as an engineer? Give names and locations of employers, description of jobs, and years employed.

4. In what Bureaus, Divisions, job positions and locations have you been employed by the FCC? State the year(s) for each separately listed period of employment.
5. A. How many FM broadcast stations have you inspected as an FCC employee?
- B. (i) How many broadcast station remote control systems have you inspected as an FCC employee? (ii) How many of these stations used telephone dial-up remote control systems?
- C. How many broadcast station studios have you inspected, as an employee of the FCC, for the purpose of determining whether a studio was capable of originating programming and sending the originated programming to a transmitter for broadcast transmission? Identify the broadcast stations inspected for the purposes described in this interrogatory 5.C.
6. A. Have you inspected an FM broadcast station licensed to Monticello, New York, formerly with call sign WXTM and now assigned WJUX? (The call sign "WJUX" is used hereinafter to identify this station.)
- B. If so, on what date(s) did you inspect that station?
7. For each date listed in response to interrogatory 6.B., state the time that your inspection of the station began and the time it ended on that date. Then provide an accounting, according to your best recollection and any notes you may have, of all of the time between the beginning and ending times on that date. (E.g., 10 AM - 10:10 AM, introduced myself to receptionist; 10:10 AM - 10:30 AM, introduced myself to manager and took tour of building, etc.) Do not leave any time unaccounted for; if a lunch break was taken, provide

your best recollection of the time of that break. If you relied on any notes to provide this accounting for your time, fully identify those notes.

8. If your answer to interrogatory 7 does not do so, identify all locations visited during the dates of inspection listed in response to interrogatory 6.B. For example, if you visited the WVOS AM/FM-WJUX studio building in Ferndale, New York, so indicate; if you visited the WJUX transmitter site, so indicate; if you visited the location of the WJUX public inspection file, so indicate.

9. If your answer to interrogatory 7 does not do so, give the name and, if you know, the job title of each person you met during your inspection(s) of WJUX.

10. A. For each person listed in response to Interrogatories 7 or 9 as having been met by you in the course of your inspection(s) of WJUX, state whether you spoke with the person.

B. For each person with whom you spoke, provide as detailed a recounting of the words spoken by you and the other person as possible. If you had more than one occasion to speak with a person, provide a separate and detailed recounting of the words spoken on each occasion.

11. Notes provided by the Mass Media Bureau indicate that you spoke with Carol Montana and Eugene Blabey during your inspection of WJUX. Your conversations with Ms. Montana and Mr. Blabey should be fully recounted above. If those conversations are not, recount them here. In particular, but not to the exclusion of any other conversations, provide all that you recall of:

- A. Any conversations with Mr. Blabey about the WJUX main studio, its former use, its equipment and capabilities, and the extent to which it had been used by WJUX;
- B. Any conversations with Mr. Blabey and Ms. Montana about their positions with WVOS AM/FM and with WJUX; and
- C. Any conversations you had with Ms. Montana or Mr. Blabey (or anyone else) about WJUX remote control.
12. A. In your conversations with Mr. Blabey, Ms. Montana, or others at the WVOS-WJUX facilities, were the names of Wesley Weis or Gerard Turro mentioned by you or any persons with whom you spoke?
- B. If so, provide a detailed recounting of each conversation in which either Mr. Weis's or Mr. Turro's name was mentioned by you or others, clearly identifying the person with whom you were speaking at the time.
13. Did you speak with anyone about WJUX's telephone number, telephone line or telephone service? If so, with whom and, in detail, what was said?
14. Did Mr. Blabey indicate to you that to provide programming from the WJUX main studio to the WJUX transmitter would require going to the transmitter site and effecting a change of cabling at the patch panel to connect the transmitter to the studio? If he did so indicate, how did he give that indication? If by spoken words, provide a detailed recounting of both sides of the full discussion. If not by spoken words, describe in detail the means by which the indication was given, and state what caused you to conclude what it was that was being indicated.

15. With respect to remote control of the WJUX transmitter and remote reading of operating parameters, describe in detail the examination and tests you made of the WJUX facilities, any review you made of written WJUX operating instructions, and any inquiries about remote control which you made to any persons (identify such persons by name, job title or, if name and title unknown, by physical description), and the responses to your inquiries.

16. A. Did you conclude that the WJUX transmitter could not be controlled and its operating parameters could not be read from the WJUX main studio?

B. If 16.A. is answered affirmatively, describe in detail what inquiries, conversations, observations, tests or other parts of your inspection led you to that conclusion?

17. Were you instructed or requested to inspect WJUX? If so, who made the request or gave you the instructions?

18. If interrogatory 17 was answered "yes", did you receive the request or the instruction in the form of a document? If yes, provide a full identification of the document.

19. If you received a non-documentary request or instruction to inspect WJUX, provide a detailed recounting of the discussion(s) in which that request or instruction was conveyed.

20. What have you been told was the cause of the instruction or request you received for an inspection of WJUX?

21. Were you told prior to your inspection to examine any particular aspects of WJUX's facilities or operations? If so, by whom?

22. The Mass Media Bureau has produced only one two-page typewritten document purporting to contain a record of an inspection of WJUX. It is attached as Exhibit 1. Did you, or your secretary, type that document?

23. If the answer to interrogatory 22 is affirmative:

- A. When was the document typed?
- B. Did you prepare it from notes?
- C. If 23.B. is affirmative, where are the notes?

24. If you or your secretary did not type Exhibit 1, who did so, when was it typed, on what is the content of Exhibit 1 based, when did you first see and when did you last review the document prior to receipt of these interrogatories?

25. A. Have you had occasion to arrange for the interruption of transmissions by the WJUX broadcast transmitter?

B. If so, provide complete details of the circumstances of the transmission interruptions, including:

- (i) How and with whom the arrangements were made.
- (ii) The date on which you made the arrangements.
- (iii) The date on which the interruptions occurred.
- (iv) The means by which, and the location from which, you directed that the interruptions occur.
- (v) The name of the person to whom you gave instructions to turn the WJUX transmitter on and off.
- (vi) The number of on and off cycles that you directed to occur.

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(vii) The purpose (i.e., what you were testing or observing) for the WJUX transmission interruptions.

(viii) The observations you made and the conclusions you reached from the interruptions.

26. Information provided to date by the Mass Media Bureau shows that you inspected WJUX in April of 1995 and never thereafter. Have you inspected WJUX since April 14, 1995, either by visiting its studio location, its transmitter site or its public inspection file location, or by monitoring the over-the-air broadcast of WJUX on 99.7 Mhz?

27. If the answer to interrogatory 26 is affirmative, provide full details of any post-April 14, 1995, inspection(s), including dates, observations made and methods and locations of inspection, and identify any and all persons to whom you conveyed any information concerning such inspection(s), along with a detailed recounting of the conveyed information.

28. Have you inspected WVOS AM/FM, Liberty, New York, since April 14, 1995? If yes, provide full details as requested in interrogatory 27.

29. A. Was there an occasion in late July or early August of 1995 when you were talking with Gerard Turro and either Wesley Weis's name or station WJUX was mentioned during the conversation?

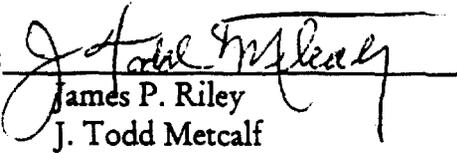
B. If so, did you say to Mr. Turro words to the effect that Mr. Weis was in trouble with the FCC and/or that the license for Station WJUX was in jeopardy?

C. If the answer to 29.B. is affirmative, provide a complete and detailed explanation of the basis of your comment. Include the identities of any FCC

employees with whom you had by then spoken about Mr. Weis or Station
WJUX, and a description of such conversations.

Respectfully submitted,

MONTICELLO MOUNTAINTOP
BROADCASTING, INC.

By: 
James P. Riley
J. Todd Metcalf

of

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 North 17th Street
11th Floor
Rosslyn, Virginia 22209
(703)812-0400

Its Attorneys

August 8, 1997

EXHIBIT 1

Monticello Mountaintop Broadcasting, Inc.

Interrogatories

To Mass Media Bureau (Loginow)

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RADIO STATION INSPECTION REPORT

WXIM Main Studio - Location

WXIM main studio is located at the existing studio of radio station WVO5 AM/FM on Old Route 17 in Ferndale NY. However, there were no signs on the outside of the building to indicate to the public that it is the studio for WXIM (only a WVO5 AM/FM sign). No telephone line is set aside for WXIM calls, nor is any line answered as WXIM.

WXIM Main Studio - Staff

The main studio is staffed by General Manager Eugene Blabey and Public Service Director Carol Montana. Eugene Blabey is also the owner of WVO5 AM/FM. Carol Montana is also the Business Manager of WVO5 AM/FM. She stated that she spends about 25% of her time for WXIM and 75% for WVO5.

WXIM Main Studio - Programming

The main studio for WXIM is a former production room of WVO5 leased by Wesley Weis. Blabey states, however, that although it is capable of being used, it has never actually provided programming to the WXIM transmitter. Indeed, he indicated that in order to do so would require going to the transmitter site and effecting a change of cabling at the patch panel to connect the transmitter to the studio.

Programming is 100 percent from Jukebox Radio in Dumont NJ, including music, advertising, news, and call sign identification. A telephone line is used deliver the audio to the transmitter.

WXIM Main Studio - Transmitter Control

There is no remote equipment installed at the main studio to control the WXIM transmitter or to read transmitter operating parameters. The transmitter is controlled full time by personnel of Jukebox Radio in Dumont NJ by telephone line.

WXIM - LMA

There is no Local Marketing Agreement between WXIM and Jukebox Radio. Instead, WXIM entered into a network agreement with Jukebox Radio. A copy of the network agreement, signed by Gerald Turro and Wesley Weis was provided to the inspecting engineer.

Jukebox Radio - STL WNG499

The transmitting antenna for the STL was observed to be in a southerly direction, within a few degrees of the direction of the translator W276AQ in Fort Lee NJ. The STL transmitter was active at the time of inspection, however, the translator at Fort Lee was determined to receiving programming off the air from the translator at Pomona NY operating on 94.3 MHz. The Pomona NY translator was determined to be receiving programming from WXIM on 99.7 MHz. Although the quality of the audio at Pomona and Fort Lee was degraded due to splatter from WBAI (in

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New York NY on 99.5 MHz), Turro stated that the condition was due to the WXTM transmitter operating at reduced power due to a recent lightning strike. The inspecting engineer had observed that the operating power at WXTM was reduced.

Jukebox Radio - Control of WXTM

Remote control equipment was observed at Jukebox Radio that was stated to be for the control of WXTM. Gerald Turro, by telephone, stated that he is Chief operator for WXTM, however, he does not receive any salary for that position.

WXTM, Monticello NY, and Jukebox Radio, Dumont NJ inspected on April 13 and 14, 1995 by engineer Serge Loginow Jr.

Fort Lee NJ Translator - Second Monitoring

The Fort Lee translator was monitored again on May 15, 1995. Audio quality was considered very high, with no detectable splatter from WBAI. While on the top floor of the apartment building housing the Fort Lee translator, the inspecting engineer transmitted a low level signal on the frequencies of 99.7 MHz, 94.3 MHz and 951.0 MHz while listening to the translator signal on 103.1 MHz. The translator output was blocked only with the transmission of a test signal on the frequency of the STL, 951.0 MHz.

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CERTIFICATE OF SERVICE

I, Deborah N. Lunt, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that true copies of the foregoing "First Set Of Interrogatories Of Monticello Mountaintop Broadcasting, Inc., To Mass Media Bureau, For Answer By Serge Loginow, Jr." was hand delivered this 8th day of August, 1997, to the following:

The Honorable Arthur I. Steinberg
Administrative Law Judge
Federal Communications Commission
2000 L Street, NW, Room 228
Washington, DC 20554

Alan Aronowitz, Esquire
Hearing Branch
Enforcement Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, NW, Room 7212
Washington, DC 20554

Suzan B. Friedman, Esq.
Hearing Branch
Enforcement Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, Room 7212
Washington, DC 20554

Charles R. Naftalin, Esquire
Koteen & Naftalin
1150 Connecticut Avenue, NW
Washington, DC 20036
Counsel for Gerard A. Turro

Richard A. Helmick, Esquire
Cohn and Marks
1333 New Hampshire Avenue
Suite 600
Washington, DC 20036
Counsel for Universal Broadcasting of New York, Inc.

003364


Deborah N. Lunt

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

In re)
)
GERARD A. TURRO) MM Docket No. 97-122
)
For Renewal of License) File Nos. BRFT-970129YC
For FM Translator Stations) BRFT-970129YD
W276AQ(FM), Fort Lee, NJ, and)
W232AL(FM), Pomona, NY)

MONTICELLO MOUNTAINTOP
BROADCASTING, INC.

Order to Show Cause Why the
Construction Permit for FM Radio
Station WJUX(FM), Monticello, NY,
Should Not Be Revoked

<u>Federal Communications Commission</u>	
Docket No. <u>97-122</u>	Exhibit No. <u>MMB-20</u>
Presented by <u>Fce</u>	
Disposition	Identified <u>/</u>
	Received <u>/</u>
	Rejected _____
Reporter <u>SP</u>	
Date <u>11-24-97</u>	

**INTERROGATORIES OF GERARD A. TURRO TO
SERGE LOGINOW, JR. AND THE MASS MEDIA BUREAU**

Gerard A. Turro, by his attorneys, pursuant to Sections 1.311 and 1.323 of the Commission's Rules, and consistent with the invitation of the Mass Media Bureau ("Bureau") of the Federal Communications Commission ("FCC") to direct written interrogatories to Mr. Loginow,¹ hereby submits his written interrogatories to the Bureau and Serge Loginow, Jr. in the above-captioned proceeding.

Pending before the Commission is Mr. Turro's petition for special authority to take the

¹Mass Media Bureau's Opposition to Petition for Special Authority to Take the Deposition of Serge Loginow, Jr., filed July 3, 1997, pp. 2-3. ("Turro has failed to establish that written interrogatories are not an adequate means for legitimately discovering facts from Commission personnel... there is no apparent reason that the parties could not direct those written interrogatories to Mr. Loginow, as contemplated by the rules, rather than a more burdensome and time-consuming oral deposition.")

oral deposition of Mr. Loginow, based upon a finding of Judge Steinberg issued previously. We continue to urge that the oral deposition of Mr. Loginow is essential to Mr. Turro's defense in this case and the most efficient means by which to examine one of the most important fact witnesses in this proceeding. However, given the looming discovery deadline of August 22, 1997, we offer these interrogatories addressed to Mr. Loginow. Although more detailed in their terms, these interrogatories are substantially the same in scope as the interrogatories which have been before the Bureau since May 23, 1997, and have not been fully answered. We present these interrogatories without prejudice to those earlier interrogatories, any remedies available to Mr. Turro based upon Bureau failures to answer, and our pending request for authority to take an oral deposition of Mr. Loginow.

INSTRUCTIONS

- A. Each interrogatory shall be deemed continuing in nature. The Bureau /Mr. Loginow should update or revise, and otherwise keep current, any substantial and material information provided in answer to these interrogatories as facts or circumstances become known or change.
- B. The Bureau /Mr. Loginow are requested to answer each interrogatory fully and completely. Where any interrogatory asks for information about documents, the Bureau /Mr. Loginow should fully describe each document identified, including the name of the document, its date, its author(s), the name(s) of the person(s) to whom it was addressed or delivered, its present location, and the name and address of the person(s) having custody of the document. In lieu of describing a document, a copy of the document may be provided. In the event that there existed at any time a document about which information is requested in these interrogatories and which no longer is in existence or cannot be found, this fact also should be provided accompanied with

an explanation as to why it is no longer in existence or cannot be found. For each such document, identify its last known location and its last known custodian.

C. Each interrogatory shall be answered under oath or penalty of perjury by a principal, officer, agent or other person with relevant knowledge and authority to act for the Bureau and/or by Mr. Loginow personally.

D. "Document," for the purposes of these interrogatories, means the original and any nonidentical copy, and/or amendment thereof, of any letter, memorandum report, handwritten note, working paper, summary of data compilation sheet, interview report, record, bill, receipt, canceled check, order, audio, data and/or video, and/or electromagnetic, and/or optical, and/or tape recording, or any other handwritten, typed printed or graphic materials to which the Bureau /Mr. Loginow or any of their agents or representatives have access. To the extent that any documents, or copies thereof, reside in or on any computer or other data system, such documents may be provided in paper form or in an electromagnetic form in a mutually agreeable format.

E. With respect to any document about which information is requested in these interrogatories and for which a claim of privilege is asserted, provide the date, type of document, author, addressee(s), general subject matter, the basis for the claim of privilege and the interrogatory number to which the document identification is responsive.

F. "Person," for the purposes of these interrogatories, means any legal or natural entity, including but not limited to corporations, partnerships, associations, firms, and their subsidiaries, principals, officers, directors, employees, subcontractors, agents and attorneys, persons, groups, collectives, cooperatives, governments and their subparts, including bureaus, offices, agencies, departments, branches, divisions, sections, boards, and commissions.

G. "Describe," for purposes of these interrogatories, means provide all information with respect to the data, rate, financial report, effects, consequences, information, person, matter, question or document inquired about, including its basis, location, origin, foundation and purpose.

H. "Identify," for purposes of these interrogatories, with respect to any document, shall mean to state its author and addressees, the type of document, including but not limited to report, computer generated output, letter, memorandum, etc., the date on which it was sent or transmitted and/or prepared, and its last known custodian and/or location.

I. The phrases "relating to," or "related to," for purposes of these interrogatories, shall mean constituting, referring to, reflecting, describing, discussing, embodying, modifying, amending, altering, concerning, in connection with, or expanding upon.

J. "Proceeding," for purposes of these interrogatories, shall mean the FCC's MM Docket No. 97-122, File No. BRFT-970129YC, File No. BRFT-970129YD, Hearing Designation Order, Order to Show Cause and Notice of Opportunity for Hearing, FCC 97-137 (released April 18, 1997) ("HDO"), and all matters referred to therein, including matters which preceded issuance of the HDO and initiation of MM Docket No. 97-122, File No. BRFT-970129YC and File No. BRFT-970129YD, including but not limited to any complaints or investigations concerning Mr. Turro and/or the broadcast stations of which he is the licensee and/or FM radio station WJUX, Monticello, New York, formerly WXTM (the "Monticello Station").

INTERROGATORIES

1. Describe and identify all information known to you relating to the allegation in the HDO that Mr. Turro's operation of translator station W276AQ, Fort Lee, New Jersey, was in violation of Section 74.531 of the Commission's Rules (47 CFR Section 74.531).
2. Identify and describe all documents relating to your response to Interrogatory No. 1, or in the alternative, provide access to such documents for copying.
3. Identify all members of the staff of the FCC who have knowledge relating to your response to Interrogatory No. 1.
4. Identify all persons who are not members of the Commission's staff known to you to have information relating to your response to Interrogatory No. 1.
5. Describe and identify all information known to you relating to the allegation in the HDO that Mr. Turro's operation of translator station W232AL, Pomona, New York, was in violation of Section 74.531 of the Commission's Rules (47 CFR Section 74.531).
6. Identify and describe all documents relating to your response to Interrogatory No. 5, or in the alternative, provide access to such documents for copying.
7. Identify all members of the staff of the FCC who have knowledge relating to your response to Interrogatory No. 5.
8. Identify all persons who are not members of the Commission's staff known to you to have information relating to your response to Interrogatory No. 5.
9. Identify and describe all technical analyzes of which you are aware relating to the operations of FM translator stations W276AQ, Fort Lee, New Jersey, and W232AL, Pomona, New York.

10. Describe and identify all information known to you relating to the allegation in the HDO that Mr. Turro's operation of translator station W276AQ, Fort Lee, New Jersey, was in violation of Section 74.1231 of the Commission's Rules (47 CFR Section 74.1231).

11. Identify and describe all documents relating to your response to Interrogatory No. 10, or in the alternative, provide access to such documents for copying.

12. Identify all members of the staff of the FCC who have knowledge relating to your response to Interrogatory No. 10.

13. Identify all persons who are not members of the Commission's staff known to you to have information relating to your response to Interrogatory No. 10.

14. Describe and identify all information known to you relating to the allegation in the HDO that Mr. Turro's operation of translator station W232AL, Pomona, New York, was in violation of Section 74.1231 of the Commission's Rules (47 CFR Section 74.1231).

15. Identify and describe all documents relating to your response to Interrogatory No. 14, or in the alternative, provide access to such documents for copying.

16. Identify all members of the staff of the FCC who have knowledge relating to your response to Interrogatory No. 14.

17. Identify all persons who are not members of the Commission's staff known to you to have information relating to your response to Interrogatory No. 14.

18. Describe and identify all information known to you relating to the allegation in the Proceeding that Mr. Turro engaged in an unauthorized transfer of control, or otherwise exercised and/or continues to exercise *de facto* control over WJUX(FM), Monticello, New York (the Monticello Station), in violation of Section 310(d) of the Communications Act of 1934, as

amended, and Section 73.3540(a) of the Commission's Rules.

19. Identify and describe all documents relating to your response to Interrogatory No. 18, or in the alternative, provide access to such documents for copying.

20. Identify all members of the staff of the FCC who have knowledge relating to your response to Interrogatory No. 18.

21. Identify all persons who are not members of the Commission's staff known to you to have information relating to your response to Interrogatory No. 18.

22. Describe and identify all information known to you relating to the allegation in the Proceeding that Mr. Turro misrepresented and/or lacked candor to the Commission concerning the operation of translator station W276AQ, Fort Lee, New Jersey.

23. Identify and describe all documents relating to your response to Interrogatory No. 22, or in the alternative, provide access to such documents for copying.

24. Identify all members of the staff of the FCC who have knowledge relating to your response to Interrogatory No. 22.

25. Identify all persons who are not members of the Commission's staff known to you to have information relating to your response to Interrogatory No. 22.

26. Describe and identify all information relating to the allegation in the Proceeding that Mr. Turro misrepresented and/or lacked candor to the Commission concerning the operation of translator station W232AL, Pomona, New York.

27. Identify and describe all documents relating to your response to Interrogatory No. 26, or in the alternative, provide access to such documents for copying.

28. Identify all members of the staff of the FCC who have knowledge relating to your

response to Interrogatory No. 26.

29. Identify all persons who are not members of the Commission's staff known to you to have information relating to your response to Interrogatory No. 26.

30. Identify all persons who have investigated or in any way tested the operations of FM translator stations W276AQ, Fort Lee, New Jersey, and/or W232AL, Pomona, New York and/or the Monticello Station.

31. Describe the investigations or testing conducted by all persons and/or agencies identified in Interrogatory 30 and all information obtained or determinations made or conclusions reached.

32. Describe and identify all documents relating to the persons, agencies or matters identified or described in response to Interrogatories 30 and 31.

33. Identify all persons, other than members of the Commission's staff, from whom Mr. Loginow or any other member of the Commission's staff obtained any information relating to the Proceeding.

34. For each person identified in Interrogatory No. 33, describe the information obtained relating to the Proceeding.

35. Identify and describe all documents relating to your response to Interrogatory No. 33, or in the alternative, provide access to such documents for copying.

36. Identify all of the dates and times when Mr. Loginow conducted any investigations and/or testing related to the Proceeding.

37. For each date and time identified in Interrogatory 36, describe:

(a) the methods and equipment used for investigation and/or testing,