

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 "Answers of Monticello Mountaintop Broadcasting, Inc., to First Set of Joint Interrogatories" were sent this 8th day of July, 1997, by first class United States mail, postage prepaid, to the following:

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

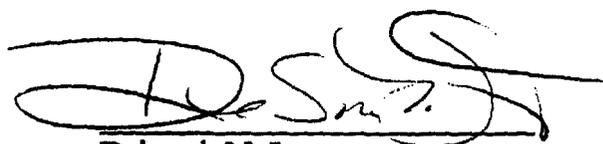
Suzan B. Friedman, Esq.*
Federal Communications Commission
2025 M Street
Room 8210
Washington, DC 20554

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

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.

*By Hand Delivery



Deborah N. Lunt

000663

11-24-97

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)	

To: Monticello Mountaintop Broadcasting, Inc.

**SECOND SET OF INTERROGATORIES OF THE MASS MEDIA BUREAU TO
MONTICELLO MOUNTAINTOP BROADCASTING, INC.**

The Mass Media Bureau (the "Bureau"), by its attorneys, pursuant to Section 1.311 and 1.323 of the Commission's Rules, hereby submits the following interrogatories to Monticello Mountaintop Broadcasting, Inc. ("MMBI") in the above-captioned proceeding. These interrogatories shall be deemed continuing and MMBI shall have an obligation to inform the Bureau of any additional and relevant information which may come to its attention subsequent to its response to the interrogatories.

000664

11-24-97

Federal Communications Commission	
Docket No.	97-122
Exhibit No.	MMB-31
Presented by	FCC
Disposition	Identified <input checked="" type="checkbox"/>
	Received <input checked="" type="checkbox"/>
	Rejected <input checked="" type="checkbox"/>
Reporter	11-24-97

Definitions and Instructions

- A. As used herein, MMBI includes its agents, employees, consultants, or other persons acting on its behalf, including legal counsel, as well as Wesley R. Weis.
- B. As used herein, Station WJUX-FM, Monticello, New York, refers to the FM radio station currently licensed to MMBI, with the former call sign WXTM.
- C. As used herein, the term "identify" when used with reference to a person or persons, means to state his/her full name, present position, last known business and residence addresses and telephone numbers, if known.
- D. As used herein, the term "identify" when used with reference to documents, means to state the date, author, addressee, type of document (e.g., letter, memorandum, report, etc.), a brief description of the subject matter, its present or last known location and its custodian. If any such document was, but is no longer in MMBI's possession or control, state the disposition which was made of it, the reason for such disposition and the date thereof. In lieu of completely identifying any document, it may be made available to the Bureau for inspection and copying by so stating in your answer, however, a brief identification of the document should still be made in answering the interrogatory.

Interrogatories

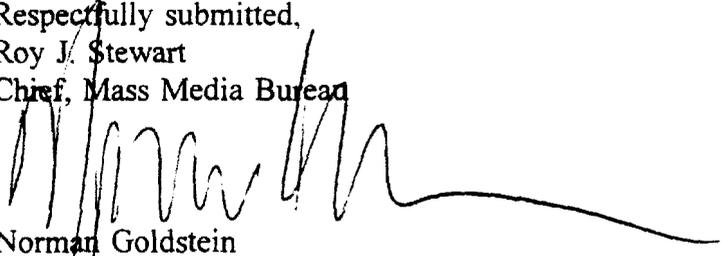
1. Does MMBI have an employee named George Spicka ("Spicka")?
2. When was Spicka hired to work at WJUX-FM? Include any time when Spicka was employed on a contract basis.
3. What is Spicka's job title at WJUX-FM?
4. How many hours per week did Spicka work prior to April, 1995?

000665

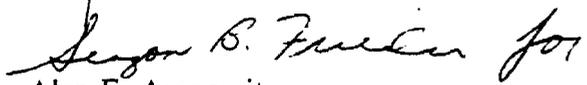
5. How many hours per week did Spicka work subsequent to April, 1995?
6. How many hours per week does Spicka currently work at WJUX-FM?
7. Was Spicka present at any inspections of WJUX-FM's facilities by a Federal Communications Commission ("FCC") field engineer in April, 1995?
8. What actions, if any, did Spicka perform during the inspection(s)?
9. Who directed Spicka to take the actions described in the response to Interrogatory No. 7, above.
10. Did Spicka speak with any WJUX-FM employees during the inspection(s)? If so, identify such employees and describe the nature of the conversation(s).
11. Did Spicka speak with any employees of Jukebox Radio, FM-103, Inc., or Bergen County Community Broadcast Foundation, Inc. during the inspection(s)? If so, identify such employees and describe the nature of the conversation(s).
12. Did Spicka speak with any employees of the FCC during the inspection(s)? If so, identify such employees and describe the nature of the conversation(s).
13. Did Spicka prepare any written report, memorandum, or other written description of the FCC inspection(s)? If so, please identify and furnish a copy of such document.
14. Did Spicka's duties of employment at WJUX-FM change after April, 1995?
15. Do Spicka's duties at WJUX-FM include the taking of meter readings?
16. If so, how often does Spicka take such meter readings?
17. Does Spicka prepare written records of the meter readings?

18. Where are these records maintained?
19. If no written records of the meter readings are made, are the result of meter readings conveyed orally to anyone, and if so, to whom?

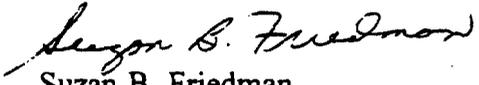
Respectfully submitted,
Roy J. Stewart
Chief, Mass Media Bureau



Norman Goldstein
Chief, Complaints and Political Programming Branch



Alan E. Aronowitz
Attorney
Mass Media Bureau



Suzan B. Friedman
Attorney
Mass Media Bureau

Federal Communications Commission
2025 M Street, N.W., Suite 8210
Washington, D.C. 20554
(202) 418-1430

August 5, 1997

CERTIFICATE OF SERVICE

CurTrisha Hicks, a secretary in the Enforcement Division, Mass Media Bureau, certifies that she has on this 5th day of August, 1997, sent by U.S. mail, U.S. Government frank, copies of the foregoing "Mass Media Bureau's Interrogatories of the Mass Media Bureau Monticello Mountaintop Broadcasting, Inc: to:

Administrative Law Judge Arthur I. Steinberg
Federal Communications Commission
2000 L Street, N.W., Suite 228
Washington, D.C. 20554

Alan Y. Naftalin, Esq.
Charles R. Naftalin, Esq.
Koteen & Naftalin
1150 Connecticut Ave., N.W.
Washington, D.C. 20036

James P. Riley, Esq.
Fletcher, Heald and Hildreth, P.L.C.
1300 North 17th Street
11th Floor
Rosslyn, VA 22209

Roy R. Russo, Esq.
Richard A. Helmick, Esq.
Cohn and Marks
1333 New Hampshire Ave., Suite 600
Washington, D.C. 20036


CurTrisha Hicks

37080316

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

PROVISIONAL RESPONSE OF
MONTICELLO MOUNTAINTOP BROADCASTING, INC.
TO MASS MEDIA BUREAU'S
SECOND SET OF INTERROGATORIES

HMB ENFORCEMENT
 COMPLIANCE
 INVESTIGATION

AUG 20 8 19 AM '97

RECEIVED

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

August 19, 1997

000669

MMB Ex. 32

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

Federal Communications Commission
 Docket No. 97-122 Exhibit No. MMB-30
 Presented by fcc
 Disposition } Identified ✓
 } Received ✓
 } Rejected _____
 Reporter F
 Date 11-24-97

PROVISIONAL RESPONSE OF
MONTICELLO MOUNTAINTOP BROADCASTING, INC.
TO MASS MEDIA BUREAU'S
SECOND SET OF INTERROGATORIES

Counsel for Monticello Mountaintop Broadcasting, Inc. ("MMBI") hereby submits the provisional response of MMBI to the Mass Media Bureau's ("Bureau") interrogatories of August 5, 1997.¹

¹This response is provisional because it has not been reviewed or signed by Mr. Wesley R. Weis, owner and president of MMBI. Mr. Weis and counsel had worked toward completing MMBI's responses by August 18, 1997, so that a complete and signed filing could be made this date, the due date under Section 1.323 of the rules. On August 18, counsel was informed that Mr. Weis had been hospitalized on an emergency basis, with cardiac (by-pass)

Bureau Interrogatories 7 through 13 ask for responses that are within the personal knowledge of George Spicka. MMBI submitted those interrogatories to Mr. Spicka and received from him a handwritten and notarized response, a copy of which is attached. His exact answers are incorporated in MMBI's responses below.

Provisional Responses to Bureau's Second Interrogatories

1. Yes.
2. August 1995. MMBI records show a payment to Catskill Communications and "Weather Service" dated May 8, 1995. MMBI believes that this is or was Spicka's company, and that the May 8, 1995, payment was for manning the WJUX transmitter during an FCC inspection of the Fort Lee, New Jersey, translator in April 1995.
3. Spicka has no formal job title, but his function is as WJUX's part-time engineer.
4. None for MMBI. He may have been employed elsewhere.
5. None until August 1995.
6. He is scheduled to work one hour per week.
7. No.²

surgery scheduled for today, August 19. Counsel for the Bureau was then advised, and told that this provisional response would be submitted. When counsel can report on Mr. Weis's post-operative condition and anticipated period of recuperation, counsel will do so. Bureau counsel was told that only then will Mr. Weis be able to review the answers supplied today, and it is possible that modifications will be made before the answers are definitively filed over Mr. Weis's signature. However, given the form of the responses to interrogatories 7 through 13 (see main body of text), it is not expected that those would change.

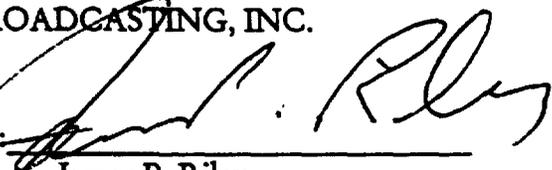
²MMBI observes that the Bureau's interrogatory asks whether Spicka was "present at any inspections of WJUX-FM's facilities" It does not ask whether Mr. Spicka was present

8. None.
9. None. N/A.
10. No.
11. No.
12. Ask the field engineer to see the equipment that they use and he said sure take a look.
13. No.
14. The interrogatory is not understandable. Spicka's employment did not begin until August 1995.
15. Yes, but only transmitter output power.
16. Weekly.
17. Yes.
18. 25-29 Aladdin Avenue, Dumont, New Jersey.
19. Not Applicable.

The foregoing submitted as MMBI's provisional response.

Respectfully submitted,

MONTICELLO MOUNTAINTOP
BROADCASTING, INC.

By: 

James P. Riley
J. Todd Metcalf

at WJUX's transmitter while an FCC inspector was inspecting some other facilities. See MMBI's answer to interrogatory 3.

of

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

Its Attorneys

August 19, 1997

7. Was Spicka present at any inspections of WTUX-FM's facilities by a Federal Communications Commission ("FCC") field engineer in April, 1995?

NO

8. What actions, if any, did Spicka perform during the inspection(s)?

NO ACT

9. Who directed Spicka to take the actions described in the response to Interrogatory No. 7, above

NO ONE N/A

10. Did Spicka speak with any WTUX-FM employees during the inspection(s)? If so, identify such employees and describe the nature of the conversation(s).

NO

11. Did Spicka speak with any employees of Jukebox Radio, FM-103, Inc., or Bergen County Community Broadcast Foundation, Inc. during the inspection(s)? If so, identify such employees and describe the nature of the conversation(s).

NO

12. Did Spicka speak with any employees of the FCC during the inspection(s)? If so, identify such employees and describe the nature of the conversation(s).

ASK THE FIELD ENGINEER TO SEE THE EQUIPMENT THAT THEY USE AND HE SAID SURE TAKE A LOOK.

13. Did Spicka prepare any written report, memorandum, or other written description of the FCC inspection(s)? If so, please identify and furnish a copy of such document.

NO

George Spicka 8/11/97

ON THIS 11TH DAY OF AUGUST 1997
GEORGE SPICKA PERSONALLY
KNOWN TO ME SIGNED
AND DATED THIS
DOCUMENT.

CAROL M. MONTANA
Notary Public, State of New York
Sullivan County Clerk's #2041
Commission Expires Dec. 12, 1998

Carol M. Montana

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 "Provisional Response of Monticello Mountaintop Broadcasting, Inc. to Mass Media Bureau's Second Set of Interrogatories" was sent this 19th day of August, 1997, by first class mail, postage prepaid, 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

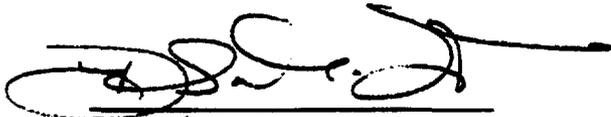
Suzan B. Friedman, Esq.*
Hearing Branch
Enforcement Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, Room 7212
Washington, DC 20554

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.

*By Hand Delivery

000675


Deborah N. Lunt

ANN BAVENDER*
ANNE GOODWIN CRUMP*
VINCENT J. CURTIS, JR.
RICHARD J. ESTEVEZ
PAUL J. FELDMAN
ERIC FISHMAN
RICHARD HILDRETH
FRANK R. JAZZO
ANDREW S. KERSTING*
KATHRYN A. KLEIMAN
EUGENE M. LAWSON, JR.
HARRY C. MARTIN
J. TODD METCALF*
GEORGE PETRITSAS
LEONARD R. RAISH
JAMES P. RILEY
KATHLEEN VICTORY
HOWARD M. WEISS
* NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW
11th FLOOR, 1300 NORTH 17th STREET
ROSSLYN, VIRGINIA 22209-3801

(703) 812-0400

TELECOPIER
(703) 812-0486

INTERNET
office@fh-telcomlaw.com

FRANK U. FLETCHER
(1939-1985)
ROBERT L. HEALD
(1956-1983)
PAUL D.P. SPEARMAN
(1938-1982)
FRANK ROBERSON
(1936-1981)
RUSSELL ROWELL
(1948-1977)
RETIRED
EDWARD F. KENEHAN
CONSULTANT FOR INTERNATIONAL AND
INTERGOVERNMENTAL AFFAIRS
SHELDON J. KRYS
U.S. AMBASSADOR (ret.)
OF COUNSEL
EDWARD A. CAINE*
JOHN JOSEPH SMITH*
WRITER'S DIRECT
703-812-0450

October 7, 1997

HAND DELIVERED

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: MM Docket 97-122

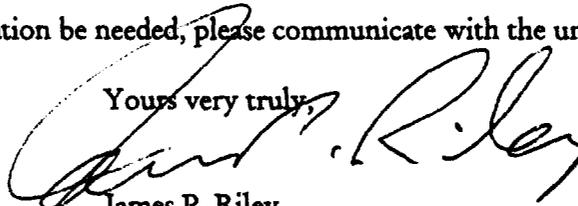
Dear Mr. Caton:

On September 30, 1997, Monticello Mountaintop Broadcasting, Inc., filed with the Commission the signed declaration of Wesley R. Weis, President of Mounticello Mountaintop Broadcasting, Inc., verifying the "Provisional Response" filed with the Commission on August 19, 1997.

The signature of Mr. Weis filed with the Commission on September 30 was a facsimile signature. There is attached hereto the original ink signature of Mr. Weis for association with this Docket proceeding.

Should further information be needed, please communicate with the undersigned.

Yours very truly,



James P. Riley
Counsel for Monticello Mountaintop Broadcasting, Inc.

JPR:deb
Enclosure

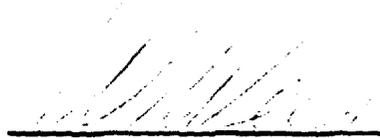
cc: The Honorable Arthur I. Steinberg (By Hand Delivery w/Enclosure)
Administrative Law Judge
Alan Aronowitz, Esquire (By Hand Delivery w/Enclosure)
Suzan B. Friedman, Esq. (By Hand Delivery w/Enclosure)
Charles R. Naftalin, Esquire (By Mail w/Enclosure)
Richard A. Helmick, Esquire (By Mail w/Enclosure)

000676

**VERIFICATION OF ANSWERS
TO MASS MEDIA BUREAU'S
SECOND SET OF INTERROGATORIES TO
MONTICELLO MOUNTAINTOP BROADCASTING, INC.**

I, Wesley R. Weis, president of Monticello Mountaintop Broadcasting, Inc., do hereby declare under penalty of perjury that, upon changing footnote 2 of the "Provisional Response" of August 19, 1997, to refer to MMBI's answer to interrogatory 2 rather interrogatory 3, the answers to the Mass Media Bureau's Second Set of Interrogatories to Monticello Mountaintop Broadcasting, Inc., filed on August 19, 1997, are true and correct to the best of my knowledge and belief.

Executed this 25th day of Sept, 1997.



Wesley R. Weis

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

JUL 20 1997
FEDERAL COMMUNICATIONS COMMISSION

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

Federal Communications Commission
Basket No. 97-122 Exhibit No. MMB 3
Presented by FCC
Disposition } Identified
 } Received
 } Rejected
Reporter DP
11-24-97

To: Gerard A. Turro and Monticello Mountaintop Broadcasting, Inc.

FIRST REQUEST FOR JOINT PRODUCTION OF DOCUMENTS

The Mass Media Bureau ("Bureau") and Universal Broadcasting of New York, Inc. ("Universal"), pursuant to Section 1.325 of the Commission's Rules, 47 C.F.R. § 1.325, hereby jointly request that Gerard A. Turro ("Turro") and Monticello Mountaintop Broadcasting, Inc. ("MMBI") produce the following documents for inspection or copying at the offices of the Complaints and Political Programming Branch, Enforcement Division, Mass Media Bureau, 2025 M Street N.W., Washington, D.C., within ten (10) days following the filing of this request.

Definitions and Instructions

a. As used herein, "Turro" means Gerard A. Turro, his agents, employees, consultants,

or other persons acting on his behalf, including legal counsel, as well as affiliated companies, including Bergen County Community Broadcast Foundation ("BCCBF"), Jukebox Radio and/or FM-103, Inc.

b. As used herein, MMBI means Monticello Mountaintop Broadcasting, Inc., any predecessor entity, subsidiary or affiliated company, and their present or former shareholders, directors, officers, principals, partners, employees, agents (including legal counsel), consultants or other persons acting on MMBI's behalf.

c. "Document" means any handwritten, printed, typed, computerized or visually or aurally reproduced material of any kind, and means the original (or duplicate original) and any non-identical copies thereof (whether different from the original because of notes made on or attached to such copy or otherwise), drafts or amendments thereof, including but not limited to, all writings, correspondence, memoranda (including memoranda of oral conversations), minutes, resolutions, agendas, notices, diaries, notes (including notes of meetings), papers, calendars, lists, records of telephone conversations, instructions, guidelines, affidavits, receipts, promissory notes, agreements, leases, contracts, financial statements, balance sheets, and federal income tax returns or any other documentary materials of any nature whatsoever including computer files in the possession, custody or control of Turro and/or MMBI.

d. As used herein, Station WJUX, Monticello, New York, refers to the FM Radio Station currently licensed to MMBI, with the former call sign WXTM.

e. As used herein, Station W276AQ, Ft. Lee, New Jersey, refers to the FM Translator Station currently licensed to Gerard A. Turro. As used herein, Station W232AL, Pomona,

New York, refers to the FM Translator Station currently licensed to Gerard A. Turro.

f. "Relate to," "relating to," "regarding," and "in regard to" mean constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or in any way is pertinent to the specified subject, including documents concerning the preparation of the documents.

g. Each document produced should be identified by the number of the document request to which it is responsive.

h. If any document which exists or existed is currently unavailable, explain why it is not currently available.

i. This request is continuing in nature, requiring supplemental responses if further or different documents are obtained during the pendency of this proceeding.

Documents Requested

The following documents are requested:

1. All written station logs, transmitter logs, and/or operational logs and/or records concerning the broadcast operations of WJUX, W276AQ, and/or W232AL, particularly any logs and/or records indicating operations at variance with licensed parameters, interruptions in normal broadcast operations and/or emergency broadcasts, including the date, duration and descriptions of such events, from October, 1994, to the present. To the extent that such records may exist, but have not been reduced to writing, provide any details concerning operations at variance with licensed parameters, interruptions in normal broadcast operations and/or emergency broadcasts, including the date, duration and descriptions of such events,

from October, 1994, to the present.

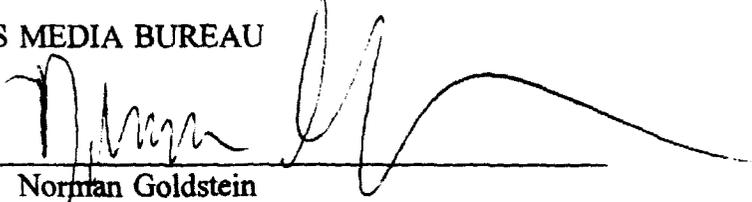
2. The public inspection file(s) for WJUX, W276AQ, and W232AL.
3. Written records of all requests for the purchase of political time on WJUX, W276AQ, and/or W232AL, as well as the disposition of any such requests.
4. All documents relating to requests for emergency broadcasts on WJUX, W276AQ, and/or W232AL, as well as the stations' response to such requests, including the date, duration, and description of the emergency broadcasts.
5. All advertising records and/or logs for WJUX, W276AQ, and/or W232AL, and/or those described in Answer No. 1 of Turro's Answers to the Bureau's and Universal's Joint Interrogatories, dated July 7, 1997, for the following time periods:
 - a. November, 1994, through February, 1995;
 - b. January and February, 1996; and
 - c. January and February, 1997.

The Bureau and Universal believe that these requested documents may contain relevant information regarding the issues specified in this proceeding or are reasonably calculated to lead to the discovery of admissible evidence. See Section 1.311(b) of the Commission's

Rules. Specifically, the requested documents will clarify the extent to which WJUX is and has been under the control of the licensee of record.

Respectfully submitted,

MASS MEDIA BUREAU

By: 

Norman Goldstein
Alan E. Aronowitz
Suzan B. Friedman

FEDERAL COMMUNICATIONS COMMISSION
2025 M Street, N.W., Room 8210
Washington, D.C. 20554
(202)418-1430

Its Attorneys

UNIVERSAL BROADCASTING OF NEW YORK, INC.

By: 

Roy R. Russo
Richard A. Helmick

COHN AND MARKS
1333 New Hampshire Ave., Suite 600
Washington, D.C. 20036
(202) 452-4830

Its Attorneys

July 22, 1997

CERTIFICATE OF SERVICE

CurTrisha Hicks, a secretary in the Enforcement Division, Mass Media Bureau, certifies that she has on this 22nd day of July, 1997, sent by regular U.S. mail, U.S. Government frank, copies of the foregoing "First Request for Joint Production of Documents" to

Administrative Law Judge Arthur I. Steinberg
Federal Communications Commission
2000 L Street, N.W., Suite 228
Washington, D.C. 20554

Alan Y. Naftalin, Esq.
Charles R. Naftalin, Esq.
Koteen & Naftalin
1150 Connecticut Ave., N.W.
Washington, D.C. 20036

James P. Riley, Esq.
Fletcher, Heald and Hildreth, P.L.C.
1300 North 17th Street
11th Floor
Rosslyn, VA 22209

Roy R. Russo, Esq.
Richard A. Helmick, Esq.
Cohn and Marks
1333 New Hampshire Ave., Suite 600
Washington, D.C. 20036


CurTrisha Hicks

000623

WIP Ex. 34