

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

<u>Federal Communications Commission</u>	
Basket No. <u>97-122</u>	Exhibit No. <u>MMB-34</u>
Presented by <u>FCC</u>	
Disposition	Identified <input checked="" type="checkbox"/>
	Received <input checked="" type="checkbox"/>
	Rejected <input type="checkbox"/>
Reporter <u>[Signature]</u>	
Date <u>11-24-97</u>	

**RESPONSE OF GERARD A. TURRO  
 TO FIRST JOINT DOCUMENT REQUEST**

Gerard A. Turro, by his attorneys, hereby submits his response to the First Request for Joint Production of Documents, by the Mass Media Bureau ("Bureau") and Universal Broadcasting of New York, Inc. ("Universal") in the above-captioned proceeding.

Pursuant to Section 1.325(a) of the Commission's Rules, Mr. Turro has produced, and is making available for inspection and copying, copies of the advertising records and/or logs, and the issues/programs lists for WJUX, Monticello, New York, which were requested by the Bureau and Universal and which are available from the files of Jukebox Radio. These documents fill a standard sized box which previously contained copier paper, representing a stack of paper about eighteen inches in height. Counsel to the Bureau or Universal are encouraged to contact counsel to Mr. Turro to arrange a convenient time for them to review these documents at the offices of

Koteen & Naftalin, L.L.P. Copying facilities will be made available for the convenience of the Bureau and Universal.

Respectfully submitted,

GERARD A. TURRO

By: /s/ Alan Y. Naftalin  
/s/ Alan Y. Naftalin

By: /s/ Charles R. Naftalin  
/s/ Charles R. Naftalin

Koteen & Naftalin, L.L.P.  
1150 Connecticut Avenue, N.W.  
Washington, DC 20036  
(202) 467-5700

August 4, 1997

His Attorneys

000685

**CERTIFICATE OF SERVICE**

I, Barbara Frank, a secretary in the law offices of Koteen & Naftalin, L.L.P., hereby certify that true copies of the foregoing "RESPONSE OF GERARD A. TURRO TO FIRST JOINT DOCUMENT REQUEST" have been served upon the following by first-class United States mail, postage prepaid, this 4th day of August 1997:

\* The Honorable Arthur I. Steinberg  
Administrative Law Judge  
Federal Communications Commission  
2000 L Street, N.W., Room 228  
Washington, D.C. 20554

\* Alan Aronowitz, Esq.  
Hearing Branch  
Enforcement Division  
Federal Communications Commission  
2025 M Street, N.W., Room 7212  
Washington, D.C. 20554

\* Stephen Barone  
Complaints and Investigations Branch  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 8210  
Washington, D.C. 20554

\* Suzan B. Friedman  
Federal Communications Commission  
2025 M Street, N.W., Room 8210  
Washington, D.C. 20554

James P. Riley, Esq.  
Fletcher, Heald & 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 Avenue  
Suite 600  
Washington, D.C. 20036

/s/ Barbara Frank  
Barbara Frank

\* By Hand Delivery

000686

*[Handwritten Signature]*

PG	END	PROGRAM TITLE / SPONSOR	LEN	TYPE	ORIG	ORDER NO	SP	SCHEDULE	
7:00:30a	08:01:30a	NATIONAL NEWS							
7:00:0a		080 BERGEN MEDICAL IMAGING CEN	60	NEWS		2528-02	1	SR 600-190	
7:02:30a	08:03:15a	SHADOW TRAFFIC							
7:03:15a	08:04:00a	WEATHER							
7:05:00a	08:05:15a	NEWS OUTRO							
<i>324 8:10</i>									
8:11:00a		038 SOUTH FALLSBURG DENTAL	60	60		2370-01	25	SR 600-190	
8:12:00a		091 AIRBROOK LIMOUSINE	60	60		1831-01	99	SR 600-190	
8:13:20a	08:13:40a	TIME CHECK							
8:13:40a	08:14:15a	SHADOW TRAFFIC							
8:14:15a	08:15:00a	WEATHER							
8:15:00a	08:15:10a	TIME CHECK							
8:15:00a		fp LIVE JOHN HARMS CENTER	60	60T		2403-01	81	FP 815	
<i>331 8:20</i>									
8:21:00a		059 NEW JERSEY EYE CENTER	60	60		2345-02	1	SR 600-235	
8:22:00a		LIVE SOLARI'S RESTAURANT	60	60T		2538-01	86	SR 600-90	
8:23:30a	08:24:15a	SHADOW TRAFFIC							
8:24:15a	08:24:45a	WEATHER							
8:30:00a	08:31:00a	LOCAL NEWS							
8:30:00a		fp LIVE THE RECORD	60	NEWS		2408-01	96	FP 830	
8:32:00a	08:32:45a	SHADOW TRAFFIC							
8:32:45a	08:33:30a	WEATHER							
8:43:30a	08:44:15a	SHADOW TRAFFIC							
8:44:15a	08:45:00a	WEATHER							
8:45:00a	08:45:10a	TIME CHECK							
<i>306 8:49</i>									
8:50:00a		045 JACK SCHLEIN BUICK	60	60		2341-01	1	SR 600-235	
8:51:00a		066 IL COCO PAZZO	60	60		2482-02	17	SR 600-190	
8:52:30a	08:53:10a	SHADOW TRAFFIC							
8:53:10a	08:53:45a	WEATHER							



TIME	END	PROGRAM TITLE / SPONSOR	LEN	TYPE	ORIG	ORDER NO	SP	SCHEDULE	
00:30a	06:01:30a	NATIONAL NEWS							
01:00a	06:03:15a	SHADOW TRAFFIC							
03:15a	06:04:00a	WEATHER							
05:00a	06:05:15a	NEWS OUTRO							
<i>309 6:00</i>									
11:00a		012 DENNIBERG ADV/BUICK DEALER	60	60B		2439-01	81	SR 600-190	
12:00a		014 PALERMO SUPPLY CO.	60	T/W		2392-01	17	SR 600-190	
13:30a	06:13:40a	TIME CHECK							
13:40a	06:14:15a	SHADOW TRAFFIC							
14:15a	06:15:00a	WEATHER							
<i>306 6:22</i>									
15:00a	06:15:10a	TIME CHECK							
21:00a		053 PROMOTION SLIDES INC	60	60		2241-01	96	SR 600-220	
22:00a		056 D & C CHEVROLET GEO HONDA	60	60B		2464-02	20	SR 600-235	
23:30a	06:24:15a	SHADOW TRAFFIC							
24:15a	06:24:45a	WEATHER							
<i>339 6:49</i>									
30:00a	06:31:00a	LOCAL NEWS							
32:00a	06:32:45a	SHADOW TRAFFIC							
32:45a	06:33:30a	WEATHER							
<i>500 6:35</i>									
43:30a	06:44:15a	SHADOW TRAFFIC							
44:15a	06:45:00a	WEATHER							
<i>339 6:49</i>									
45:00a	06:45:10a	TIME CHECK							
50:00a		LIVE SOLARI'S RESTAURANT	60	60T		2538-01	86	SR 600- 90	
51:00a		LIVE THE JEWELRY SOURCE	60	60		2426-01	23 2	600- 95	
52:30a	06:53:10a	SHADOW TRAFFIC							
53:10a	06:53:45a	WEATHER							
55:00a	06:55:00a	TRANSLATOR I.D.							
59:00a	06:59:30a	LEGAL ID/NEWS SOUNDER							
59:30a	07:00:30a	JUKEBOX RADIO NEWS							

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*Steve Harris*

G	END	PROGRAM TITLE / SPONSOR	LEN	TYPE	ORIG	ORDER NO	SP	SCHEDULE
10:00:00p	10:00:00p	LEGAL ID/NEWS SOUNDER						
10:05:00p	12:03:00p	JUKEBOX RADIO NEWS						
2:03:00p		024 DEUTSCH/RESNICK/SAVITS/GRE	60	NEWS		2536-01	17	SR 600-1
2:04:00p	12:05:00p	TRAFFIC & WEATHER TOGETHER						
2:06:00p	12:06:00p	JUKEBOX RADIO JINGLE						
2:12:00p	12:12:00p	LINER BOOK						
2:12:00p		047 PERO'S RESTAURANT/NEWBRIDG	60	60		2092-01	96	SR 600-1
2:13:00p		026 KENNEY'S APROPOS	60	60		2404-03	19	SR 600-1
2:14:00p		150 JACK SCHLEIN BUICK	60	M/HB		2343-01	1	SR 600-2
2:15:00p	12:15:00p	JUKEBOX RADIO JINGLE						
2:20:00p	12:20:00p	PROMO						
2:21:00p	12:22:00p	WEATHER FORECAST						
2:22:00p		269 HACKENSACK RECORD KING	60	60T		2414-02	96	ROS
2:23:00p		038 SOUTH FALLSBURG DENTAL	60	60		2370-01	25	SR 600-1
2:24:00p		150 JACK SCHLEIN BUICK	60	M/HB		2343-01	1	SR 600-1
2:26:00p	12:26:00p	JUKEBOX RADIO JINGLE						
2:41:00p	12:41:00p	SHADOW TRAFFIC REPORT						
2:42:00p	12:42:00p	PROMO						
2:49:00p	12:50:00p	WEATHER/COMMUNITY EVENTS CALENDAR						
2:51:00p		066 IL COCO PAZZO	60	60		2482-02	17	SR 600-
2:52:00p		039 INVESTMENT CONCEPTS	60	60B		2508-03	21	SR 600-
2:53:00p		150 JACK SCHLEIN BUICK	60	M/HB		2343-01	1	SR 600-
2:54:00p	12:54:00p	JUKEBOX RADIO JINGLE						
2:55:00p	12:55:00p	TRANSLATOR ID						

119  
 397  
 384  
 12:37



# The Sounds of Sinatra with Sid Mark

FS 97-8 • Hour 1 • w/e of Feb. 22 & 23

promo :34

Program Open, Billboard, Station ID at 1:42

HOURLY 8P-9P

00:00-02:00

Cue: right after this.

02:00-13:27

Program Material  
Only One to a Customer  
Love Makes us Whatever We Want to Be  
My Foolish Heart  
Say Hello

2

#5  
8:16 Joelle's (JL1296)  
Q: great trades be yours.

13:27-16:27

National 1 & 2 and Local 1  
1. & 2. PTP & Associates :2:00

16:27-30:43

Program Material  
All The Way Home  
Barbara  
The Girls I've Never Kissed  
The Saddest Thing of All

3

#21  
8:32 Beckman's Liquors (BEE 297)  
Q: Blue Eyes. #6  
8:33 Boiling Springs (BEE 114)

30:43-33:43

National 3 and Local 2 & 3  
3. Sinatra Auction Catalog :60

33:43-44:24

Program Material  
Desafinado  
Bonita  
Song of The Sabia

4

#56  
8:47 D+C Chevrolet (D+C 64)  
Q: 19106.

44:24-47:24

National 4 & 5 and Local 4  
4. Cold-seze :60  
5. Sinatra Songbook :60

47:24-53:13

Program Material  
Shadow of the Moon  
Blue Lace

5

53:13-56:13

National 6 and Local 5 & 6  
6. MBNA :60

56:13-59:50

Program Material  
Stay With Me

6

FRANK I.D  
Q: America Bank NA #48 (STI)  
8:55 STILLMAN Automotive  
8:56 IL BOCO #220 (IL 1)  
#66

Cue: right after this.

000630

*[Handwritten signature]*

Time	Program	Code	Length	Rate	Product	Spots	Start	End
10:00:00a	JUKEROX RADIO NEWS							
10:05:00a	TRAFFIC & WEATHER REPORTER							
10:06:00a	JUKEROX RADIO SINGLE							
10:12:00a	LEADER BOOK							
10:12:00a	039 INVESTMENT CONCEPTS		60	60			2502-01	21 SR 100-19
10:12:00a	045 COVER GIRL		60	60			2452-01	1 SR 100-22
10:14:00a	035 ENGLEWOOD VOLVO		60	60			2513-01	23 SR 100-19
10:15:00a	JUKEROX RADIO SINGLE							
10:20:00a	PRONO							
10:21:00a	WEATHER FORECAST							
10:21:00a	016 AMERICAN STAG COMPANY		30	60			2027-01	25 SR 100-22
10:23:00a	091 AIRBORNE LIBRARY INT		60	60			2031-01	25 SR 100-19
10:24:00a	006 SUPPORT PLANS		60	60			2033-01	19 SR 100-19
10:26:00a	JUKEROX RADIO SINGLE							
10:41:00a	WMOU TRAFFIC REPORT							
10:42:00a	PRONO							
10:49:00a	WEATHER/NATIONAL COMMISSION							
10:51:00a	070 EMERGENCY BUYERS		60	60			2405-03	1 SR 100-19
10:52:00a	007 HACKENSACK UNIVERSITY MEDICAL		60	60			2453-05	23 SR 100-19
10:53:00a	071 THE RECORD		60	60			2408-02	96 SR 100-20
10:54:00a	JUKEROX RADIO SINGLE							

*350 10:11*

*3971048*



02/10/77  
SATURDAY WITH SINATRA

*Dublin*  
Hour 1 7P-8P

[REDACTED]

[REDACTED]

11:00p CIN SOLARI'S 60 00/0 0107 01 17 08 1700 01

[REDACTED]

[REDACTED]

11:30p CIN SOLARI'S RESTAURANT 60 00/0 0107 01 17 08 1700 01

[REDACTED]

11:45:00p CIN SOLARI'S RESTAURANT 60 00/0 0107 01 17 08 1700 01

[REDACTED]

[REDACTED]

00p CIN SOLARI'S RESTAURANT 60 00/0 0107 01 17 08 1700 01

000033

MMB Ca. 35

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

ORIGINAL

11-5-97

**CORRESPONDENCE  
FILE**

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

**RESPONSE OF**  
**MONTICELLO MOUNTAINTOP BROADCASTING, INC.,**  
**TO FIRST JOINT DOCUMENT REQUEST**

Monticello Mountaintop Broadcasting, Inc. ("MMBI"), by its attorneys, hereby responds to the joint request of the Mass media Bureau and Universal Broadcasting of New York, Inc., filed pursuant to Section 1.325 of the FCC's rules, for production of documents in certain described categories.<sup>1</sup>

Federal Communications Commission	
Docket No. 97-122	Exhibit No. MMB-35
Presented by	FCC
Disposition	Identified <input checked="" type="checkbox"/>
	Received <input type="checkbox"/>
	Rejected <input type="checkbox"/>
Reporter	[Signature]
Date	11-24-97

<sup>1</sup>Counsel for the Bureau consented to an extension to this date for MMBI's production.

000034

No. of Copies rec'd 024

Documents are this date being delivered to the Bureau, as indicated below. Universal may either review the documents delivered to the Bureau or contact counsel for MMBI to inspect and copy the documents.

Category 1. Station logs for WJUX for August 17, 1995, to July 27, 1997, are delivered to the Bureau herewith. The fax key line is not a part of the original log.

Category 2. The public inspection file for WJUX is delivered to the Bureau herewith. The quarterly issues/programs lists, previously furnished to the Bureau from the WJUX public inspection file, are not included in the current delivery.

Category 3. Documents within this category are included in the Category 2 production.

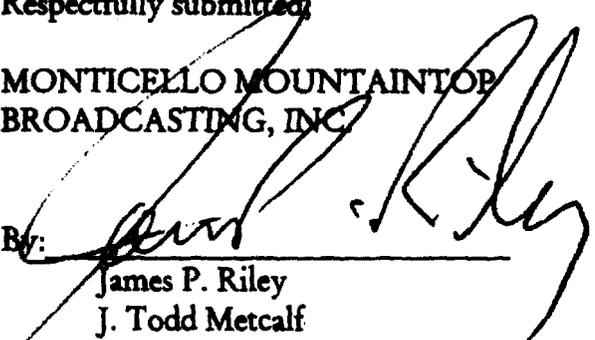
Category 4. No such documents for WJUX have been located.

Category 5. No such documents for WJUX have been located.

MMBI is continuing to examine records and files, and should additional documents responsive to the joint request turn up they will be promptly produced.

Respectfully submitted,

MONTICELLO MOUNTAIN TOP  
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 5, 1997

**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 "Response of Monticello Mountaintop Broadcasting, Inc., to First Joint Document Request" was sent this 5th day of August, 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

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

000657

  
Deborah N. Lunt



## Jukebox Radio Political Rates

	<u>Day</u>	<u>Run-of-Schedule</u>
60 seconds	\$75	\$65
30 seconds	\$60	\$55

**Day:** 6am-7pm, Mon-Fri, Best Times Available

**Run-of-Schedule:** 6am-12 midnight, Best Times Available

Rates above are net to station; for agency rates, contact your Jukebox Radio Account Executive.

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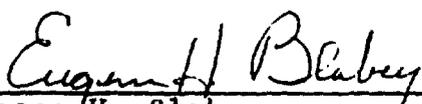
JUKEBOX RADIO  
99.7 FM



Box 888  
LIBERTY, NY  
12754

September 25, 1995

WJUX-FM, Liberty/Monticello is not accepting political  
orders until further notice.

  
\_\_\_\_\_  
Eugene/H. Blabey  
General Manager

000639

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NAB FORM PB 14 July 1992 -- (Item #40-16)



AGREEMENT FORM FOR POLITICAL BROADCASTS

STATION and LOCATION WXTH - Jukebox Radio Date 11-1 1994

I, Howard J. Bookbinder (being) (on behalf of) \_\_\_\_\_

a legally qualified candidate of the Democratic political party for the office of Freeholder

in the General election to be held on November 8, 1994, do hereby request station time as follows:

Length of Broadcast	Time of Day, Rotation or Package	Days	Class of Time	Times Per Week	No. of Weeks	Rate
<u>60</u>		<u>FRIDAY</u>		<u>4</u>		<u>75</u>
		<u>MONDAY</u>		<u>4</u>		
		<u>TUESDAY</u>		<u>4</u>		

Date of First Broadcast <u>11/4/94</u>	Date of Last Broadcast <u>11/8/94</u>
-------------------------------------------	------------------------------------------

Total Charges: \$900

The broadcast time will be used by Bergen County Democratic Committee  
I represent that the payment for the above-described broadcast time has been furnished by \_\_\_\_\_

\_\_\_\_\_ and you are authorized to announce the time as paid for by such person or entity. The entity furnishing the payment, if other than an individual person, is ( ) a corporation; (  ) a committee; ( ) an association; or ( ) other unincorporated group. The names and offices of the chief executive officers of the entity are:

Jerry Calabrese, Chairman  
Joseph Iaconne, Treasurer

I agree to indemnify and hold harmless the station from any damages or liability, including reasonable attorney's fees, that may ensue from the performance of the above-stated broadcasts. For the above-stated broadcasts I also agree to prepare a script or transcription, which will be delivered to the station at least \_\_\_\_\_ before the time of the scheduled broadcasts. (Note: the two preceding sentences are not applicable if the candidate personally appears during the broadcast.) This station has disclosed to me its political advertising policies, including: applicable classes and rates; and discount, promotional and other sales practices. (Note: The preceding sentence may be deleted). The purchase of the time described herein is controlled, approved or authorized by the candidate or his/her authorized committee. (Note: the preceding sentence applies only to candidates for non-federal office.)

Date: 11/1/94 \_\_\_\_\_  
(Candidate, or Agent)

Accepted  Rejected By [Signature] Title General Mgr

This request, whether accepted or rejected, will be available for public inspection for a period of two years.

**BROADCAST STATION  
ANNUAL EMPLOYMENT REPORT 1996**

(For FCC Use Only)

Code No.

**SECTION I**

<b>A. Name of Licensee or Permittee</b> MONTICELLO MOUNTAINTOP BROADCASTING, INC.	<b>B. Address</b> P.O. Box 888 Liberty, N.Y. 12754
-----------------------------------------------------------------------------------------	----------------------------------------------------------

**SECTION II**

**A. TYPE OF RESPONDENT (check ONLY one)**

COMMERCIAL BROADCAST STATION		NONCOMMERCIAL BROADCAST STATION		HEADQUARTERS
AM <input type="checkbox"/>	AM	TV <input type="checkbox"/>	TV	ER <input type="checkbox"/> Educational AM or FM Radio
FM <input checked="" type="checkbox"/>	FM	LP <input type="checkbox"/>	Low Power TV	ET <input type="checkbox"/> Educational TV
AF <input type="checkbox"/>	Combined AM & FM in same area (must file a combined report)	IN <input type="checkbox"/>	International	HQ <input type="checkbox"/>

**B. List call letters and location(s) of included stations. AM station is to be listed first in a combined report. Provide former call letters for each station if changed since last 395-B report.**

CURRENT CALL LETTERS	LOCATION(S)	FORMER CALL LETTERS
WJUX-FM	Monticello, New York	WXTM-FM

**SECTION III**

**A. PAYROLL PERIOD COVERED BY THIS REPORT (DATE)** \_\_\_\_\_

**B. CHECK APPLICABLE BOX**

- Fewer than five full-time employees during the selected payroll period (Complete page one only and certification statement and return to FCC)
- Five or more full-time employees during selected payroll period (Complete all sections of form and certification statement and return to FCC)

**SECTION IV CERTIFICATION**

This report must be certified, as follows: (a) By licensee, if an individual; (b) By a partner, if a partnership (general partner, if a limited partnership); (c) By an officer, if a corporation or an association; or (d) By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).**

I certify to the best of my knowledge, information and belief, all statements contained in this report are true and correct.

Signed E.H. Blabey Title General Manager  
 Print Name Eugene H. Blabey Date 26 May 96 Telephone No. (914) 292-0751

000701

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 )  
)  
To: Honorable Arthur I. Steinberg  
Administrative Law Judge

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

Federal Communications Commission	
Docket No. 97-122	Exhibit No. MMB-36
Presented by	FCC
Disposition	Identified <input checked="" type="checkbox"/>
	Received <input checked="" type="checkbox"/>
	Rejected <input type="checkbox"/>
Reporter	[Signature]
Date	11-24-97

**AMENDMENT TO ANSWERS OF GERARD A. TURRO  
TO JOINT INTERROGATORIES OF THE MASS MEDIA  
BUREAU AND UNIVERSAL BROADCASTING OF NEW YORK, INC.**

Gerard A. Turro, under penalty of perjury, hereby states the following:

During the final stages of preparing my direct case exhibits, which were filed with the Commission yesterday, I discovered that I had slightly misstated my answer to Interrogatory No. 29 to the Joint Interrogatories submitted to me by the Mass Media Bureau and Universal Broadcasting of New York, Inc., and the answers to which I originally provided on July 7, 1997. I hereby amend Interrogatory Answer No. 29 to state:

29. Mr. Turro believes that some telephone calls were forwarded from the studios of WJUX, Monticello, New York, to the studios of Jukebox Radio at some point in time. Mr. Turro

has no explanation as to why that call forwarding took place. He has no recollection of arranging or authorizing it. Mr. Turro took steps to end that call forwarding practice shortly after he discovered it by bringing it to the attention of MMBI personnel.

November 11, 1997

By:   
Gerard A. Turro

  
JOSEPH A. LAZIZZA  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires Sept. 1, 2002

**CERTIFICATE OF SERVICE**

I, Barbara Frank, a secretary in the law offices of Koteen & Naftalin, L.L.P., hereby certify that true copies of the foregoing "AMENDMENT TO ANSWERS OF GERARD A. TURRO TO JOINT INTERROGATORIES OF THE MASS MEDIA BUREAU AND UNIVERSAL BROADCASTING OF NEW YORK, INC." have been served upon the following by first-class United States mail, postage prepaid, this 12th day of November 1997:

- |                                                                                                                                                                                |                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| * The Honorable Arthur I. Steinberg<br>Administrative Law Judge<br>Federal Communications Commission<br>2000 L Street, N.W., Room 228<br>Washington, D.C. 20554                | * Suzan B. Friedman<br>Federal Communications Commission<br>2025 M Street, N.W., Room 8210<br>Washington, D.C. 20554                   |
| * Alan Aronowitz, Esq.<br>Hearing Branch<br>Enforcement Division<br>Federal Communications Commission<br>2025 M Street, N.W., Room 7212<br>Washington, D.C. 20554              | James P. Riley, Esq.<br>Fletcher, Heald & Hildreth, P.L.C.<br>1300 North 17th Street<br>11th Floor<br>Rosslyn, VA 22209                |
| * Stephen Barone<br>Complaints and Investigations Branch<br>Mass Media Bureau<br>Federal Communications Commission<br>2025 M Street, N.W., Room 8210<br>Washington, D.C. 20554 | * Roy R. Russo, Esq.<br>Richard A. Helmick, Esq.<br>Cohn and Marks<br>1333 New Hampshire Avenue<br>Suite 600<br>Washington, D.C. 20036 |

/s/ Barbara Frank  
Barbara Frank

\* By Hand Delivery