August 10, 1995

STATEMENT

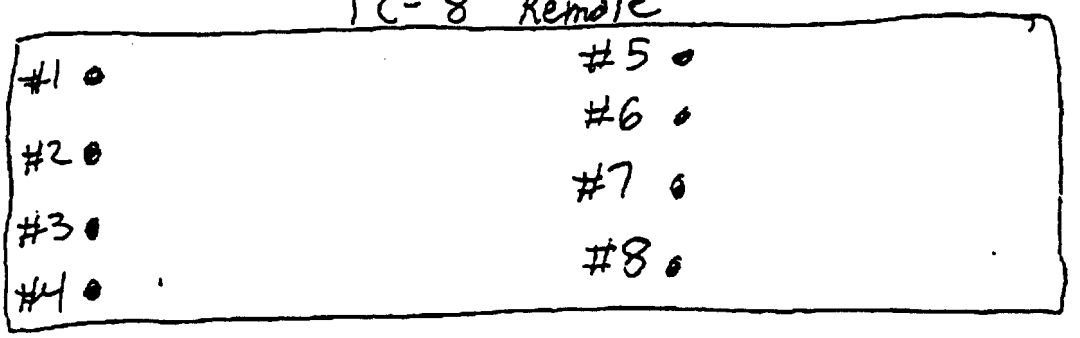
Under penalty of perjury, I the undersigned make the following statement:

My name is William Gaghan, employed by Jukebox Radio, Bergen County Broadcast Foundation as Music Director, then Program Director and Afternoon Disc Jockey from March 1, 1993 until May, 1995.

Most of the time, during my employment at Jukebox Radio, programming was sent directly from Dumont, NJ, studios over a microwave dish, located on the building next to 75 Second Street (Wes Weiss building). It was also set up that if Fort Lee lost the microwave signal then it would come over a back-up telephone line. I was told this by Jerry Turro. In fact a couple of times, we were off the air in Monticello, but were still on the air in Fort Lee.

In the main air studio underneath the reel to reel machine and processing equipment, was a panel that consisted of eight lights (TC-8 Remote) operated by a three button system control which was "channel, raise, lower".

TC-8 Remote



When light #1 was lit, this sent the signal to the Fort Lee translator over microwave or telephone line.

I was told by Gerry Turro if the FCC came around, I was to switch it over to the #5 light this way the signal for Fort Lee was coming from Monticello to Pomona then to Fort Lee.

During my employment , the few times we were off the air in Monticello we would still be on the air in Fort Lee because the light would be in the number #1 position.

I recall one specific episode in April of this year, where I had to partake in a situation that involved me and two other employees. We had received word that an FCC inspector was coming from Monticello (WJUX). Apparently, the inspector wanted to see if the Monticello unit could be shut off by remote control from our Dumont location. Jay Epstein, who is the general manager, told all three of us that our jobs would be in jeopardy if we did not follow Gerry's instructions. Gerry, at that time, was in Las Vegas at the NAB convention. While one employee had to take the Monticello transmitter off the air, I had to hold the switch that controlled the signal being sent to Monticello, while another employee had to turn the master gain on the console. Thus, making it look like we had control of the Monticello transmitter from the Dumont studios.

William Gaghan

EDITH M. ZECCA
Notary Public, State of New York
No. 41-4943323
Qualified in [illegible] County
Commission Expires October 17, 1996

July 31, 1995

LARRY HOPPER
2 ALADDIN AVE #303
DUMONT NJ 07628

RE: WJUX-FM, originally at 88.7 Franklin Lakes, NJ, doing business as JUKEBOX RADIO from studios at 75 Second ST Dumont, NJ and rebroadcasting through translator W276AQ at 103.1 FM Fort Lee, NJ.

According to an article by John Cichowski in the July 30th Bergen Record relating the Rube Goldberg manner in which Jukebox radio originates its signal in Bergen County and routes it through a rural NY state radio station and two subsequent Translators to broadcast in Bergen County, owner Jerry Turro is quoted in a sidebar highlight saying, "WHAT WE DO MAY BE UNUSUAL, BUT IT'S NOT ILLEGAL".
This is just another menifestation of a longstanding fiction.

Beginning in college Turro has sought to establish a broadcast outlet in Bergen County. His efforts to establish a station able to originate programming met with FCC rebuffs. He purchased a translator in Ft. Lee to rebroadcast distant signals. His next step was to petition the FCC to originate programming to the Translator. The FCC denyed the petition because it prohibited Translators from originating programming.
When the license for 88.7 fm became available in Franklin Lakes, NJ, he bought the station after forming the non-profit Bergen County Broadcast Foundation. He represented to the FCC his plan to originate programming for 88.7 which would be picked up by his Translator in FT. Lee. This was the fiction. In fact, 88.7fm was a decoy.

Programming originating in Dumont was transmitted to Franklin Lakes supposedly for rebroadcast on the translator. It was not.

Programming originating in Dumont was transmitted directly to Fort Lee via a microwave installation atop a neighboring building in Dumont housing MIKAB, a constructor of transmitter towers.

The test of signal movement is that all underwriting and promotional messages containing commercial aspects (i.e., *call to action, qualitative references...*) were recorded using a tertiary tone. When the tone reached Franklin Lakes it kicked in melodies generated by a Casio keyboard to replace the sensitive parts of the messages airing on the non-commercial outlet.

The keyboard melodies were broadcast from 88.7 but were never heard in the translator rebroadcast.

WHY?

Because programming originating in Dumont was going directly to Fort Lee, bypassing Franklin Lakes.

Turro's non-profit Bergen County Broadcast Foundation was directly feeding music and other programming to the translator; a commercial outlet.

When I told Gerry (correct spelling) that I was going to add music license information to the song inventory he said not to bother because he pays a flat non-commercial rate. I then mentioned his stated plans of future satellite feeds to distant, possibly commercial, stations. His response — "Don't worry about it".

Since he was limited by non-commercial restrictions on advertising he shut down 88.7 and began feeding the signal to WXTM and the Pomona translator. In effect, he realigned his decoy service.

The subterfuge became apparent approximately a month and a half ago. I was speaking with a Jukebox Radio staff member and asked how things were going. He told me Gerry had to go upstate because the station there was off the air.
"How long were you off down here," (Bergen County) I asked. He responded, "We weren't off down here."
Because he was broadcasting directly to Ft Lee by microwave from Dumont there was no broadcast lapse in Bergen county. He, Gerry Turro, was originating programming directly to a Translator in flagrant disregard for FCC regulations and rulings.

To reiterate an earlier point.
Since Turro is now Transmitting to commercial WJUX-FM (WXTM) in Monticello, NY, Translating through Pomona NY, and again, so his fiction goes, through Ft Lee, has his non-commercial music licensing fee been altered to commercial assessments?
It's a question ASCAP, BMI, et al. might wish to examine.

On Aug. 1, 1995 came before me Larry Hoppen.
In The State of N.J.
County of Bergen
Carol A. Ducato

August 9, 1995

STATEMENT

Under penalty of perjury, we the undersigned make the following statement:

My name is Vincent D. Luna, employed by Jukebox Radio, Bergen County Broadcast Foundation from February 28, 1993 until May, 1995.

There were times when W276AQ, Fort Lee received audio from Dumont via:

1. Microwave Line (microwave dish is installed on top of building next to 75 Second Street - This building is occupied by Mikab - a company owned by Wes Weis.

2. In the event that the microwave link failed - a back-up phone line would automatically engage so no interruption of the audio channel could occur. When the system ran in this mode (telephone line), the audio quality heard on 103.1 FM would be slightly diminished.

On a date in early April, I was informed that an FCC inspector was at the Monticello transmitter site. The inspector wanted to see if the Monticello unit could be shut off by remote control from Dumont. Gerry Turro was away at the NAB conference in Las Vegas and was contacted by General Manager, Jay Epstein. Gerry Turro was made aware of the the situation. (Note person A and B, are two employees). I was instructed by Gerry Turro to relieve the staff announcer (A). He (Gerry) told me that he wanted (A) to stand next to the remote control for Monticello while at the same time he wanted person (B) to stand next to the remote control for Fort Lee. He also instructed me to operate the Master Audio Control in the following manner: Gerry told me that he would give me a 3-2-1 countdown - upon 1, I was to drop the audio, Person (A) was to shut down Monticello and Person (B) was to shut off Fort Lee. Turro said that this had to be done to prove that by shutting off Monticello, there would be no way for 94.3 to receive audio and consequently 103.1 should also not be able to receive audio from 94.3 FM. Gerry's attempt at deception failed however

because the remote control for Monticello did not operate and did not shut off the transmitter. The resulting scenario witnessed by the FCC Inspector would show that the audio was indeed silenced but the transmitter was still at full power. There should have been audio heard at all 3 sites - because shutting down the Monticello transmitter does not normally shut down the audio feed.

Person (B) and I were both told by Jay Epstein that our jobs were on the line if we didn't do the above. He said that the station could lose its license and we'd both be out of jobs. The control unit - TC-8, is located under the reel to reel in the studio behind the announcer position. This unit is the remote for the Fort Lee translator. When Light 1 is lit, audio is fed to Fort Lee from Dumont via a microwave dish. The system would divert to a back-up phone line if the dish failed to operate.

When light 5 was lit, I was told that the Fort Lee translator received audio from 94.3. 94.3 received its audio from 99.7 and 99.7 received its audio path from the Dumont studio.

To the best of my knowledge, the system ran in mode 1 most of the time, except at the time of the FCC inspections. When I requested from Gerry an instruction sheet for the Fort Lee remote control, he consistently avoided the issue. All other operations in the radio station had accompanying operating procedure sheets.

Vince D. Luna 8/9/95

EDITH M. ZECCA
Notary Public, State of New York
No. 41-4943323
Qualified in Queens County
Commission Expires October 17, 1996

CERTIFICATE OF SERVICE

CurTrisha Hicks, a secretary in the Enforcement Division, Mass Media Bureau, certifies that she has on this 23rd day of June, 1997, sent by U.S. mail, U.S. Government frank, copies of the foregoing **"Mass Media Bureau's Supplemental Answers to Interrogatories"** 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.
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1300 North 17th Street
11th Floor
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Roy R. Russo, Esq.
Richard A. Helmick, Esq.
Cohn and Marks
1333 New Hampshire Ave., Suite 600
Washington, D.C. 20036

CurTrisha Hicks

CERTIFICATE OF SERVICE

CurTrisha Hicks, a secretary in the Enforcement Division, Mass Media Bureau, certifies that she has on this 23rd day of June, 1997, sent by regular U.S. mail, U.S. Government frank, copies of the foregoing **"Mass Media Bureau's Opposition to Motion to Compel"** 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
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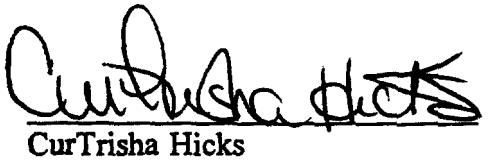
Washington, D.C. 20036



CurTrisha Hicks

TURRO EXHIBIT NO. 21

Turro hearing
Black
8/5

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

In re	)	
	)	
GERARD A. TURRO	)	MM Docket No. 97-122
	)	
For Renewal of License for FM Translator Stations	)	File Nos. BRFT-970129YC 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: Gerard A. Turro		

Case No. 97-122 Official Exhibit No. T-21
Disposition: Identified ✓
Rejected ___ Received ✓
IN THE MATTER OF: Turro
Date: 11-24-97 Witness: Reporter: Shomer
No. Pages:

MASS MEDIA BUREAU'S SECOND SUPPLEMENTAL ANSWERS TO INTERROGATORIES OF GERARD A. TURRO

On May 23, 1997, Gerard A. Turro (Turro), by his attorneys, submitted interrogatories to the Mass Media Bureau ("Bureau") and the Bureau filed its answers on June 9, 1997. On June 23, 1997, the Bureau filed Supplemental Answers to Interrogatories. The Bureau, pursuant to its continuing obligation to update its answers to such interrogatories as appropriate, submits the following second supplemental answers to Turro's interrogatories.

Interrogatories

Interrogatory No. 31: Describe the investigation conducted by the inspector referred to in the HDO and all information obtained.

Answer: The Bureau has supplied Turro with all the information pertaining to the investigation referred to in the HDO. However, in the course of the Bureau's investigation in this proceeding, it has come to our attention that Serge Loginow ("Loginow"), an FCC field engineer, conducted two other investigations of facilities licensed to Turro. These investigations occurred on July 31 and August 2, 1995. The Bureau did not rely on the information obtained from these inspections in preparing the HDO. The July 31 inspection was conducted at the request of the Wireless Telecommunications Bureau to determine if Turro had complied with an order from that Bureau to terminate his operation of inter-city relay station WMG-499. Having determined that the inter-city relay had been turned off, Loginow, on August 2, 1995, then inspected the Fort Lee and Pomona translators that are the subject of this proceeding. The purpose of the August inspection was to determine whether Turro was receiving the signal from WJUX off-air at the Pomona translator and whether Turro was receiving the signal from Pomona off-air at Fort Lee.

After each of these inspections, Loginow sent e-mail messages to FCC staff members in the Wireless and Mass Media Bureaus. Copies of these e-mails are attached. Loginow did not make any handwritten notes or other written accounts regarding these inspections and therefore, there are no other documents relating to these inspections.

I, Suzan B. Friedman, hereby swear under penalty of perjury that the foregoing

answers are true and correct.

Suzan B. Friedman

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

Norman Goldstein
Chief, Complaints & Political
Enforcement Division
Mass Media Bureau

Suzan B. Friedman for
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

From: Serge Loginow
To: SLINN,SBARONE
Date: 8/1/95 12:09pm
Subject: Gerald Turro Update

Gerald Turro Update

On site monitoring in area of Jukebox Radio studio in Dumont NJ on July 31, 1995. The STL (WMG499) was not observed to be in operation on 951.00 MHz, or any frequency near 951.00 MHz.

The audio quality of the Fort Lee NJ translator signal, however, indicated that the input signal was NOT off air from the Pomona NY translator on 94.3 MHz as licensee Gerald Turro claims, but rather from alternate means, presumably via telephone lines. (The audio quality of Fort Lee via off air means had been observed during April 1995 when WXTM Monticello NY and Jukebox Radio was inspected.)

From: Serge Loginow Jr
To: fobmail:oadal5:PCUNIX:CAD:CONV:B4.B4:SBARONE
Date: 8/4/95 9:46am
Subject: Gerald Turro Update # 2

On site monitoring in area of the Fort Lee NJ translator on August 2, 1995. The audio quality appeared to be very high. It was particularly free of sideband splatter from adjacent FM stations as was observed previously. Telephoned Turro and asked for an inspection of the Fort Lee translator. He replied no problem, he can be there in about twenty minutes. Turro arrived and demonstrated off air reception of the Pomona NY translator (94.3 MHz) by deactivating the receiver and observing the loss of audio output from the translator. He then offered to make a similar demonstration at the Pomona NY translator with the engineer. Turro and Loginow went to Pomona NY. The output of the translator there was deactivated and again the Fort Lee translator was observed to lose audio output. Turro had installed additional filters at Pomona to greatly improve the reception of WJUX Monticello NY.

It appears that Turro is now able to provide a consistent high quality audio signal off air from the Pomona NY translator at the Fort Lee NJ location.

Furthermore, while at Fort Lee, Turro demonstrated the ability to receive moderately good audio directly from WJUX Monticello (99.7 MHz). Again, he was using filters similar to those he installed at Pomona NY. Turro said he plans to fine tune the equipment to further improve the Monticello signal quality and then permanently connect it as part of the translator station.

Serge

CERTIFICATE OF SERVICE

CurTrisha Hicks, a secretary in the Enforcement Division, Mass Media Bureau, certifies that she has on this 5 day of Augst, 1997, sent by U.S. mail, U.S. Government frank, copies of the foregoing **"Mass Media Bureau's Second Supplemental Answers to Interrogatories"** 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.
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Roy R. Russo, Esq.
Richard A. Helmick, Esq.
Cohn and Marks
1333 New Hampshire Ave., Suite 600
Washington, D.C. 20036

CurTrisha Hicks

TURRO EXHIBIT NO. 22

CN-6 161-100
STAMP & RETURN

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

RECEIVED
AUG - 7 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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	)	

Case No. 97-122 Official Exhibit No. T-22
Disposition: Identified ✓ Rejected ____ Received ✓
IN THE MATTER OF: Turro
11-24-97 Shonard
Date: Witness: Reporter:
No. Pages:

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

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[1]Mass 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,