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Before the  
Federal Communications Commission  
Washington, DC

JUL 28 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In Re:

Jerry Szoka,  
Cleveland, Ohio

CIB Docket No. 98-48

Order to Show Cause Why a Cease  
and Desist Order Should Not Issue

Declaration of Jerry Szoka.

1. My name is Jerry Szoka. This declaration is submitted in opposition to the Motion for Summary Decision filed by the Compliance and Information Bureau on June 10, 1998.

2. I am the President of Grid Radio, Inc., which operates Grid Radio on 96.9 MHZ., channel 245A, Cleveland, Ohio, with 48.8 w. ERP and an antenna height of 80 feet HAAT.

3. Grid Radio went on the air in September of 1995 and now broadcasts seven days a week. The hours of operation are 4 p.m. to 3 am., Monday through Friday, with broadcasts beginning at 1 p.m. on weekends.

4. Grid Radio operates in the public interest serving an audience and program needs not otherwise served in the Cleveland market. At present there

are 11 FM stations assigned and operating in Cleveland. In addition, approximately 5 additional FM stations assigned to surrounding communities can also be readily received throughout the Cleveland market. These FM stations operate on a variety of formats, but none serves the distinct audience and programming content needs served by Grid Radio.

5. Grid Radio serves the aesthetic, cultural, entertainment, and information needs of an audience consisting primarily of the gay community in and around Cleveland. One of the ways the information and public affairs content is provided is through a program entitled "The Beat Boys Show," which airs prime time when people are home and able to listen, on Sundays 2-5 pm. It consists of, among other things, news that effects the local as well as national gay community i.e., gay marriage issues, hate crimes issues, local night life events, and interviews with people of interest to the gay community. We just recently interviewed a local cab driver who wrote a book about his experiences driving the streets of Cleveland, and all the crazy things that people do late at night, especially coming home from the clubs, and how often he gets requests from passengers to be taken to a gay nightclub who are in from out of town. Another way in which the gay community of Cleveland is served only by Grid Radio, is the way in which we are able to respond to local fund-raising events for various charitable organizations. Once such event called the "We Are

Family Picnic," a yearly event in which all proceeds benefit the local Aids Organizations, was broadcast live over Grid Radio. That event alone had several thousand people turn out for the fund-raising, and was an overwhelming success. Still yet another event is Pride. Gay communities all over the world celebrate Gay Pride in the month of June. The largest of these events are in New York and San Francisco. This year I had hoped to broadcast live from Pride as well but mother nature had other plans, and the event was rained out this year. I have yet to see any other station in the country broadcast from a gay event such as the ones I have mentioned. Grid Radio has been a leader, out on the cutting edge in many areas, with only a few examples mentioned in this declaration. Grid Radio's ability to serve the unique needs of its audience in the public interest is unique to in Cleveland, if not throughout the United States, and can best be accomplished through this type of microbroadcast station.

6. More generally, Grid Radio helps to facilitate a sense of "community" among its audience. When people have something in common, it brings them together. That feeling of bonding, that feeling of connection, or linkage is what Grid Radio does for the gay community. We provide a sense of empowerment and strength to a voice that would otherwise but stifled, and we do it in a manor that is inclusive to all people. We don't disparage, say, straight people, or any other group or community for that matter. We promote tolerance on all levels.

7. Grid Radio has a community bulletin board which I announce, and invite the listeners to send in any announcements or upcoming events they want aired. We promote the arts as well as local plays. We give out movie passes to the local independent theaters which may be showing movies with a gay theme that never make it to the main chain theaters. Grid Radio just recently had another contest in which the winners received passes to a gay comedy show that was appearing at the Improv Comedy Club. None of the full power "full service" commercial stations in Cleveland have promote such events? Grid Radio also promotes the State of Ohio's Designated Driver Courtesy Club Card Program of which The Grid is an active member. Unlike most commercial radio stations, Grid Radio truly does care about it listeners and does public service announcements during prime time and not during some obscure time of the wee morning hours when no one is listening. We promote AIDS Awareness, safe sex issues and where listeners can go for anonymous AIDS testing. I was a founding member of the AIDS Housing Council of Greater Cleveland which provide housing for persons who have no place to go for whatever reason, gay or straight.

8. Grid Radio also routinely provides counseling information, for example, where one might turn to if they are having trouble dealing with their

homosexuality. This especially applies to younger people who may have these feelings, and are either afraid to ask for help, or don't know who to ask. Teen suicide of gay adolescents is appallingly high, and if Grid Radio can reach one person to let them know that they are not alone and there are places that they can turn to for help in a supportive manner and not be subjected to ridicule or physical violence, than this whole FCC/Grid Radio struggle for legitimacy is worth it! Now that's Community Radio !!!

9. Grid Radio also highlights the latest import dance music, and let the listener know who the artist is as well as the title. We always encourage requests as the program has a very large listening audience. Many times other commercial radio stations will pull selected songs from Grid Radio's play list for their own airing. Grid Radio prides itself on being on the cutting edge of dance music as demonstrated by the volume of calls and by the favorable mail we get.

10. Grid Radio does not air any advertiser supported commercial announcements, in the belief that its audience is best served without any commercial messages. Grid Radio has no income and is entirely supported through the work and contributions of volunteers. Both of these decisions have contributed to an extremely loyal and enthusiastic audience and staff.

11. Grid Radio's aesthetic, cultural, and entertainment content is also provided through a format of club-oriented dance music. This type of program format is only available in Cleveland on Grid Radio.

12. There is one other commercial radio station in Cleveland that has a 3 hour radio show that plays some of the music that Grid Radio plays, but it's loaded with commercials and people calling in on-air requests. A sophisticated audience does not want to hear callers into the station saying "I want to say hi to all my friends [by name], all my cousins, bla, bla, bla etc." I happen to be talented in music, since I have been a nightclub DJ for 20 years, and I have taken that talent to the air, 7 days a week via Grid Radio. The key to Grid Radio's success has been without a doubt the music presented in a club-style (all songs blend into one another without a noticeable break) format without commercial interruptions.

13. Grid Radio broadcasts live everyday from The Grid nightclub. This format is also not offered by other stations in Cleveland, and provides our audience with a unique sense of "being there" and participation in the life of the community for listeners who are unable to be at a club. We hear all the time from listeners that are so happy they can hear such great club music and don't have do worry about having to be 21 years old to get into a club to hear it. I

feel it cuts down on drunken drivers because they can stay home and party to club music and don't have to worry about driving.

14. The Grid is in full compliance with copyright laws, and has been a dues-paying member of ASCAP since its inception. Grid Radio does not selectively promote The Grid nightclub, and routinely provides information to the audience concerning events at other area clubs, street festivals and entertainment activities

15. As for my technical and broadcast background, I am a licensed electrician. I was in technical repair & maintenance and had my own 3 hour weekly radio show for five years at WRUW F.M. 91.1, 1 kw., Cleveland, a college station. The experience at that station not only gave me insight as to FCC requirements as far as meter readings and just what it takes to keep a station going, but also what a huge demand there was for the type of music I played in the club-style format I pioneered.

16. The equipment for Grid Radio cost approximately \$4,000. Grid Radio is dedicated to the highest possible technical standards within its limited budget. We put out a very good quality clean stereo signal, without drifting, clipping or over-modulation. My equipment meets or exceeds technical standards for equivalent "type approved" equipment.

17. Being an electrician, I do have knowledge of electronics, and I reached this conclusion by this reasoning. If I install an outlet for someone, as long as it works when someone plugs into it, it doesn't matter if it's white, gold, yellow, or polka dot. Although polka dot may be a little harsh on the eyes, it will provide the electricity as it is designed to do. As long as it is well built to high standards, it will get the job done. The same is true with well-built broadcast equipment. As long as it meets or exceeds "type approved" standards, it will get the job done with or without the "type approved" label on it. I refuse to use equipment that is substandard or which may cause interference.

18. As is the case with computers ever changing on a daily basis and getting better & faster, so has the electronics industry as a whole. Broadcast and reception equipment are no different. It has gotten so good in the past decade or so, that many of the standards & laws of years past are simply outdated and haven't kept up with changing times. Grid Radio has proven that over the last two years. The FCC has yet to come up with any evidence of interference causing a problem to anyone. I take regular meter readings to make sure I am within FCC limits of equipment function.

19. I first had the idea of establishing a station because so many members of my former college station audience asked when I would be back on the air. I had done a few remote broadcasts from a night club while on the college

station, and had considered doing it again, but it was a major event to set up the equipment every time that was to happen, and it would have only been on 3 hours a week. Hardly worth the effort considering now how Grid Radio serves the community 7 days a week on a permanent frequency. The college format is very difficult for the average listener to follow anyway, since the type of shows that air often change every hour or so, polka one minute and heavy metal the next. With Grid Radio the listener can enjoy a consistent format 7 days a week. No matter when they tune-in, they know they can expect quality programming!

20. A year a half later, I hit upon the idea of establishing an actual station. I had heard about the legal controversy surrounding Radio Free Berkeley and became intrigued with the micro broadcasting and community radio movement. By building and operating Grid Radio, I realized I could serve two important goals. First, I could broadcast great club music and serve the entertainment and information needs of the gay community which were being ignored by existing licensees. Second, I could help prove the necessity, utility, and efficiency of this service to the FCC, the broadcasting community at large, and the general public.

21. I selected 96.9 based on a frequency search for a clear channel at my intended ERP and HAAT. I had a formal frequency survey done, Exhibit A, that showed only minimal interference to a second adjacent channel station,

243B, in Akron. From a practical standpoint, especially given technological improvements in transmitting and receiving equipment and my low power operation, the actual likelihood of interference to a bona fide listener of WKDD-FM would be zero.

22. I wrote to the FCC to obtain a license application. After careful review of these materials and the Commissions rules and statutes, I realized that Congress and the Commission had erected a virtually impenetrable barrier to the operation of Grid Radio. The FCC had stopped licensing new low-power (Class D) FM stations in 1978. Low-power FM translator stations were being authorized without a formal frequency allocation, but FCC rules prohibited local program origination on these facilities. The cost of applying for a license for a "full power" station, the purchase of the equipment, and compliance with a plethora of rules, many of which had nothing whatsoever to do with actual programming content, far exceeded my fairly meager economic resources. Moreover, a "full power" station was not needed for the audience and format I wished to provide my community.

23. FCC Detroit sent me a February 20, 1997 letter critical of Grid Radio's unlicensed operation and demanding a response. The letter made no claim of harmful interference to other services or broadcasters. It did not ask

that I cease operations. My 3/26/97 response questioned why anyone "would want to shut down a fabulous station like 96.9 when it is not interfering with anyone on any other frequency and it is fulfilling a much needed community service." The letter went on to stress the unique nature of Grid Radio and invited the FCC to forbear until such time as there was either harmful interference or an unacceptable signal.

24. FCC Detroit's June 11, 1977 letter found Grid Radio's response "unacceptable," but provided no explanation.

25. By letter dated April 22, 1998 to the Chief, CIB, I asked for certain information which I believe is necessary in order to prepare a response to the FCC's Complaint, including the persons making complaints against Grid Radio; the nature of Grid Radio's activities that were complained about; whether there have been any complaints alleging harmful interference; and the nature and outcome of technical measurements made by the FCC. While some of this technical information was provided as attachments to the CIB's Motion for Summary Decision, I continue to believe it is essential to have all of this information in order to prepare an adequate response.

26. I want to emphasize that I never intended to violate the law, specifically the Communications Act of 1934. After careful study, it is my belief that the FCC is violating its own statute and the Constitution by making it virtually impossible for me to broadcast to my audience.

27. I was finally able to obtain the assistance of pro bono counsel on Jun 18. Upon the advice of counsel, I will file as quickly as possible for appropriate authority from the FCC to operate Grid Radio, including a license application and an application for temporary research and development authority to demonstrate the viability and necessity of micro broadcasting. I fully support, and have filed comments, in the rulemaking petitions to authorize this service, Dockets 9208 and 9242. Favorable Commission action on these proposals may facilitate my licensed operation.

28. In the meantime, while the micro broadcasting rulemaking's are under consideration, and while this enforcement proceeding is pending, it would be an unjust and unreasonable hardship on Grid Radio and on its listeners to terminate operation, especially given the vital public interest served by Grid Radio and the absence of harmful interference to other services or licensed broadcasters.

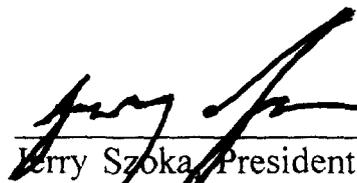
29. I have attached hereto as Exhibit B, a sampling of letters from 'The Community' that support the vital public interest being served by Grid Radio. After all, isn't it the "Community" at large that we are serving? It's the "Community" that is unhappy about commercial radio in general, and it is just people like me that are forced to make a stand with micro broadcasting for those that are calling for it, and for those that don't know that they should be calling for it because they think that nothing can be done about it.

30. Neither I nor Grid Radio have the ability to pay the proposed \$11,000 forfeiture. Nor do I believe that a forfeiture is justified because I am serving a vital community interest and have caused no harm. Moreover, I do not believe that I should be fined because I desire in good faith to test and challenge restrictions imposed by the Commission while I am exercising my right to speak (and protecting the right of my audience to listen) through Grid Radio as protected and guaranteed by the First Amendment.

31. I strongly believe that any and all hearings in this case should be held in Cleveland, Ohio. It is simply impossible to present evidence on the public interest issues that must be addressed in this hearing because the bulk of such evidence must come from the Community served by Grid Radio.

I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge.

7-24-98  
Date

  
\_\_\_\_\_  
Jerry Szoka, President  
Grid Radio, Inc.

**CERTIFICATE OF SERVICE**

I, Hans Bader, hereby certify that copies of the DECLARATION OF JERRY SZOKA were served via hand-delivery on this 28th day of July 1998, to the following:

Chief Administrative Law Judge Joseph Chachkin  
Federal Communications Commission  
2000 L Street, N.W., Suite 226  
Washington, D.C. 20554.

Jacqueline Ellington, Esq.  
Federal Communications Commission  
2025 M Street, NW, Suite 8210  
Washington, D.C. 20554.

William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554.  
(Original and six copies)

*Hans Bader*

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Hans Bader

**EXHIBIT A**

April 25, 1998

Mr. Jerry Szoka  
1281 West 9<sup>th</sup> St.  
Cleveland, OH 44113

Dear Mr. Szoka,

You asked our office to prepare a study of your FM radio station operating on 96.9 MHz at Cleveland.

You provided information on the antenna height and type, power, transmission type and length. From this information we derived the following parameters of operation:

Power Out put:	52 watts
Transmission Line RG8U (90 ft.)	Loss = 1.53 dB,
Antenna Comet Model CFM-95SL	Power Gain = 1.334
Antenna Height 80' AG, 36.6 Watts input	ERP = 48.8 watts (vertical)

Using the base elevation you provided of 648 feet and adding the antenna height above ground of 80' we get the value of 728' (221.9 meters) which is the antenna height above mean sea level. This is the antenna height we applied for the channel study. The power used in the study was 48.8 watts effective radiated power.

The attached channel-study shows the relationship between your station which is listed on the top the page as the reference station and other stations which have both a distance and channel relationship are listed below the dashed line.

The study shows that interference is caused to two stations, WKDD, channel 243B and WONEFM, channel 248B, both in Akron. <sup>96.5</sup>

Signal calculations using the FCC method places the WKDD F(50-50) 70 dBu signal contour at your station's transmitter site. Since this station is two channels removed from your operating channel, section 73.509 of the Commission's Rules and Regulations gives a ratio of +20 dB between an interfering signal contour and another station's protected signal contour. When the ratio is greater than +20 dB interference will be caused to the protected station. In the case of your <sup>97.5</sup> <sup>96.5</sup>

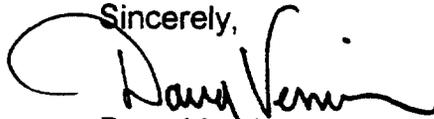
station, the 90 dBu signal (70 + 20 dBu) travels on the average of 1.5 kilometers. Therefore, interference will be caused to WKDD within a circle of approximately 1.5 kilometers from your transmitter. Using population figures from the 1990 US Census we have determined that there are 4,471 people within this area.

Interference is also caused <sup>97.5</sup> WONEFM. Since this is a third adjacent channel that delivers a 60 dBu F(50-50) signal at your station's transmitting site, the undesired signal from your station can be as large as 100 dBu before interference is caused. Our calculations place this signal .5 kilometers from your transmitter. Therefore interference will be caused in a circular area around the transmitter having a .5 kilometer radius. The 1990 census figures place no permanent residents within this area. Consequently, your station causes no real interference to this station.

Please find enclosed two maps which depict the location of the calculated interference and which show population block clusters from the US Census.

Should you have any questions on this matter, please do not hesitate to give me a call.

Sincerely,



Doug Vernier  
Enc

## HOW TO READ THE FM COMPUTER PRINT-OUT

The computer printout should be self-explanatory for the most part. The parameters of the station being checked, (reference station) are printed in the heading. The 60 dBu protected contour is predicted from the Commission's F(50-50) table, while the 40, 54, 80 and 100 dBu contours are interference contours derived from the Commission's F(50-10) table. Contour distances are in kilometers and are predicted using spline interpolation from data points identical to those published in Report No. RS 76-01 by Gary C. Kalagian. Critical contour distances are determined using the Commission's TVFMINT FORTRAN subroutine. When interference contour distances are less than 16 kilometers the F(50-50) tables are used. If signal contour distances are less than 1.6 km the free-space equation is used.

The column listed **"\* IN \***" is the sum of the reference station's 60 dBu protected contour and the data file station's interference contour subtracted from the distance between the stations. (All distances are derived by the method detailed in Sec. 73.208 of the Rules and Regulations as amended in Docket 80-90.) Therefore, the column is a measure of incoming interference. Negative distances in this column indicate the presence of interference. Listed antenna heights are the average heights of eight standard radials as found in the Commission's records unless otherwise noted, in which case the specific antenna heights along the azimuths between the reference station and the database station are used and visa versa. The column labeled **"\* OUT \***" shows the distance of kilometers of overlap or clearance between the reference station's interference contour and the database station's protected contour. Negative distance figures in this column indicate outgoing interference.

Under the "BEARING" column, the first row of numbers indicate the bearings from true north of the data base stations in relationship with the reference station, while the numbers in the second row indicate the reverse bearings from the database station to the reference station.

The columns labeled "INT" and "PRO" hold the distance in kilometers of the appropriate interference contour and the protected contour of a data base station.

For I.F. relationships the "IN" and "OUT" columns change their significance. The letter "R" stands for the minimum **required** distance in kilometers, while the letter "M" in the next column follows the **available clear space** separation in kilometers. Minimum separation distances when displayed are taken from Sec 73.207 of the rules as amended. Canadian and Mexican separation distances, U/D ratios and protected contour values are from the US/Mexican Working Agreement and the US/Canada Working Agreement".

The first three letters of the "TYPE" column identify the current F.C.C. status of the stations. The fourth letter will be a "D" or "Z" (Sec. 73.215) if the facility is directional. The fifth letter will be an E, H or V depending on the type of antenna polarization. The sixth letter will be a "Y" if the antenna uses beam tilt.

04-23-1998

DOUG VERNIER

319 266-8402

CH# 245A - 96.9 MHz

Jerry Szoka

INTERFERENCE CHECKS WITH SZOKA, CLEVELAND, OH at N. LAT. 41 30 00 W. LNG. 81 42 01

PWR = .0488 kW H.A.A.T. = 14.6 M C.O.R. = 222 M AMSL

Protected F(50-50) 60 dBu = 4.72 km

F(50-10) 40 dBu = 15.21 54 dBu = 6.69 80 dBu = 1.61 100 dBu = .5

F(50-10) 37 dBu = 18.75 51 dBu = 8 77 dBu = 1.85 97 dBu = .71

F(50-10) 34 dBu = 23.06 48 dBu = 9.62 74 dBu = 2.25 94 dBu = .98

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR(kw)	INT(km)	PRO(km)
CITY	STATE	LICENSEE			<---		LNG.	HAAT(M)	COR(M)	FILE #

243B	WKDD *	LI CN	6.2	-39.3	156.0	36.31 km	41 12 05	50.00	25.40	73.32
Akron	OH	Obc Broadcasting, Inc.			336.0	22.56 Mi	81 31 25	230.8*	443	BLH7094
> Reference HAAT at 156 degrees = 25.1 M, Pwr.= .0488 kW, Pro. Dist. = 4.72 km, Int. Dist. = 2.25 km										

244C1	AL244 *	AL	-20.4	-7.7	308.7	91.35 km	42 00 35	100.00	105.85	86.84
Leamington	OH				128.7	56.76 Mi	82 33 45	304.8*	0	

FCC Comment &gt; Specially-negotiated, short-spaced channel ltd. to 60kw ERP &amp; 138m HAAT,

25.6kw ERP &amp; 300m HAAT, 5kw ERP &amp; 150.5m HAAT, 1.5kw ERP &amp; 150.5m HAAT, 80kw

ERP &amp; 150.5m HAAT, 15.5kw ERP &amp; 144m HAAT, 4.5kw ERP &amp; 150.5m HAAT, 78kw ERP

&amp; 300m HAAT, 73kw ERP &amp; 300m HAAT in the directions of 1, 112, 155, 217, 249

280, 183, 160 &amp; 226 degrees towards WYDG, Lexington, MI, WKTJ Mercer, PA,

WKDD, Akron, OH, WBVI, Fostoria, OH, WZJU, Wauseon, OH, WJFN, Albion, MI,

WPJV, Willard, OH, WCMJ, Cambridge, OH, &amp; WCSM, Celina, OH, respectively.-

Objected by Commission 920701-Accepted by Commission 920902

&gt; Reference HAAT at 308.7 degrees = 48 M, Pwr.= .0488 kW, Pro. Dist. = 5.94 km, Int. Dist. = 12.18 km

245A	AP245	AP CN	7.5	55.5	232.8	99.00 km	40 57 29	6.00	86.76	28.29
Willard	OH	Christian Faith Broadcast,			52.8	61.52 Mi	82 38 16	100.0	420	BPH960507M5

245A	ALOPEN	AL N	1.7	49.7	237.5	93.17 km	41 02 49	6.00	86.76	28.29
Willard	OH	84-231		WO= 960	57.5	57.89 Mi	82 38 10	100.0	0	

FCC Comment &gt; Accepted by Canada as B1 on 920522

245A	AP245	AP CN	4.8	52.8	230.4	96.29 km	40 56 41	6.00	86.76	28.29
Willard	OH	KM Communications, Inc.			50.4	59.83 Mi	82 34 56	100.0	431	BPH960507MD

245A	AP245	AP DCN	1.1	49.1	235.3	92.57 km	41 01 23	6.00	86.76	28.29
Willard	OH	Great Plains Broadcasting			55.3	57.52 Mi	82 36 22	100.0	407	BPH960507MP

FCC Comment &gt; No Directional Antenna Tabulations Submitted

245A	AP245	AP CN	5.0	52.8	233.8	95.61 km	40 59 21	6.00	85.89	27.57
Willard	OH	Willard Community Broadcas			53.8	59.41 Mi	82 37 06	95.0	413	BPH960507MN

245A	AP245	AP CN	5.1	53.1	232.4	96.55 km	40 58 01	6.00	86.76	28.29
Willard	OH	Knox Broadcasting Corp.			52.4	59.99 Mi	82 36 36	100.0	421	BPH960507M1

246B	WREOFM*	LI CN	4.1	12.0	65.0	84.23 km	41 48 58	50.00	75.41	62.64
Ashtabula	OH	Radio Enterprises of Ohio,			245.0	52.34 Mi	80 46 52	133.1*	388	BLH6047

FCC Comment &gt; Grandfathered with 50 kW ERP at 152 meters HAAT

&gt; Reference HAAT at 65 degrees = 23.5 M, Pwr.= .0488 kW, Pro. Dist. = 4.72 km, Int. Dist. = 9.62 km

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR(kW)	INT(km)	PRO(km)
CITY		STATE	LICENSEE		<---		LNG.	HAAT(M)	COR(M)	FILE #

2488	WONEFM*	LI CN	39.5	-15.3	168.5	49.39 km	41 03 51	12.00	5.18	63.67
Akron		OH	US Radio, L.P.		348.5	30.69 Mi	81 34 59	283.6*	591	BLH810625AD

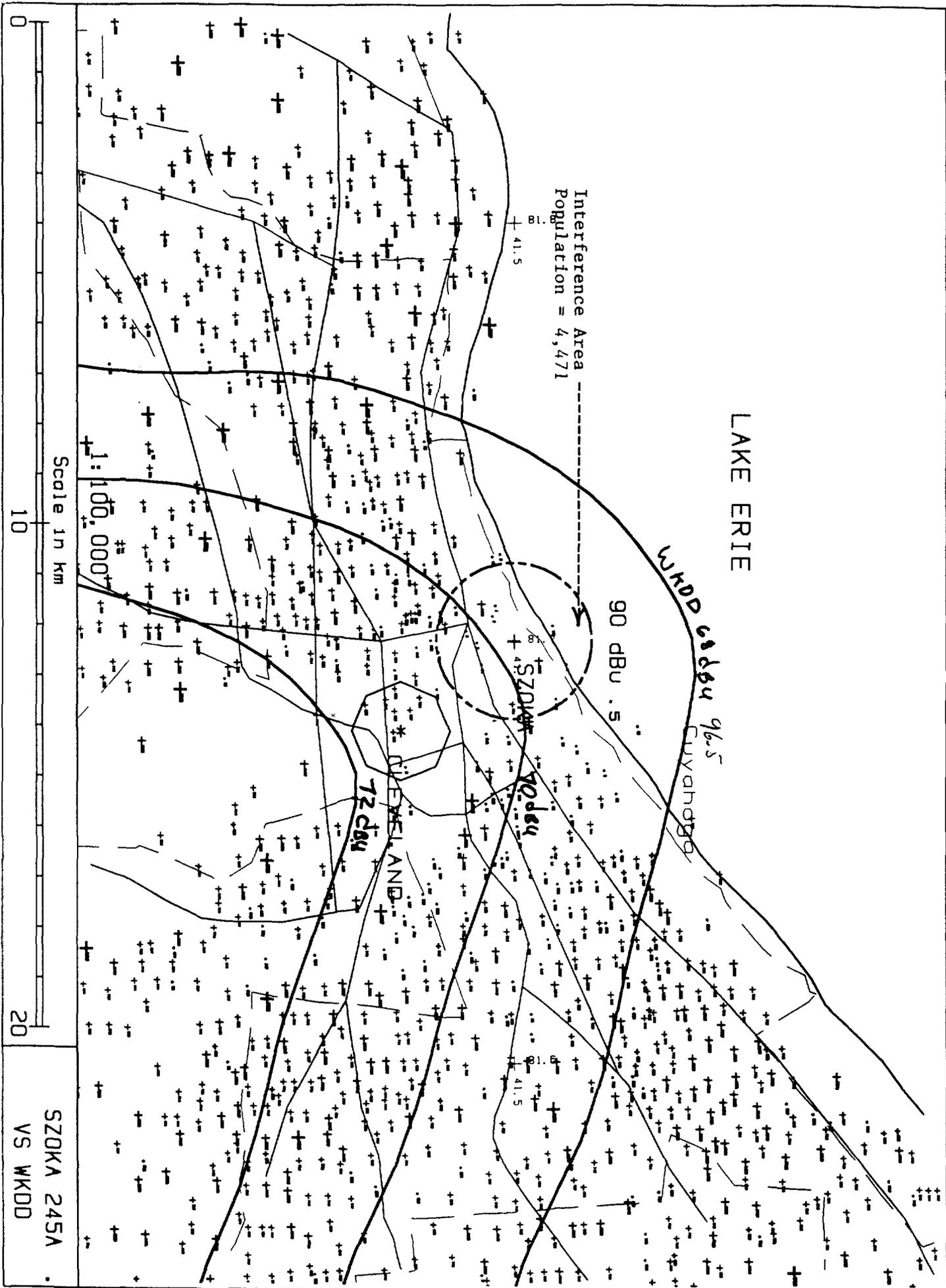
FCC Comment > SPECIAL NEGOTIATED SHORT-SPACED ALLOCATION

> Reference HAAT at 168.5 degrees = -12.9 M, Pwr. = .0488 kW, Pro. Dist. = 4.72 km, Int. Dist. = .98 km

I.F. RELATIONSHIPS: NONE FOUND

\* Uses actual antenna radial HAAT and power toward reference





LAKE ERIE

WHDG 68 dBu 96.5  
Cuyahoga

Interference Area  
Population = 4,471

90 dBu .5

SZOKA 245A

70 dBu

72 dBu

DIXIELAND

Scale in Km

1:100,000

10

20

SZOKA 245A  
VS WKDD

**EXHIBIT B**

# Letters Sent in By THE LISTENING PUBLIC

[dj\\_turbo@hotmail.com](mailto:dj_turbo@hotmail.com)

I FEEL THAT GRID RADIO BRINGS A MUCH NEEDED CHANGE TO THE CLEVELAND RADIO SCENE. IF YOU'RE INTO DANCE MUSIC, THERE IS NOTHING FOR YOU IN CLEVELAND OTHER THAN GRID RADIO. ALL OTHER STATIONS PLAY THE SAME OLD PLAYED OUT SONGS DAY AFTER DAY. THE GRID PLAYS NEW MUSIC IN A DANCE FORMAT, CONTINUOUSLY WITHOUT ANY DJ BABBLE. I FEEL IT BELONGS IN CLEVELAND AS MUCH AS THE ROCK HALL DOES.

[reddevil29@aol.com](mailto:reddevil29@aol.com)

WE JUST WANTED TO LET EVERYONE AT THE GRID AND THE FCC KNOW THAT WE FEEL GRID RADIO IS A VALUABLE ASSET TO THE COMMUNITY. IT PROVIDES US WITH MUSIC THAT WE CANNOT HEAR ON COMMERCIAL RADIO. TO SHUT IT DOWN WOULD LIMIT THE CREATIVE OUTLETS IN THE CITY.

M. Callaghan "cal" Zunt

3674 W 138th St.

Cleveland, Oh 44111

I WOULD LIKE TO ENCOURAGE YOU TO KEEP THE RADIO KNOWN AS "GRID RADIO" BROADCASTING. THE STATION IS SORELY NEEDED IN THE CLEVELAND TO BALANCE THE COMMERCIAL-DRIVEN LARGER STATIONS. THE GRID PROVIDES A PUBLIC SERVICE IN OFFERING GREAT MUSIC TO OUR CITY. I HIGHLY ENCOURAGE YOU TO KEEP THIS STATION OPEN.

[Augk@aol.com](mailto:Augk@aol.com)

I AM WRITING TO VOICE MY SUPPORT OF THE RADIO STATION 96.9 FM. I FIND IT TO BE A PLEASANT ALTERNATIVE TO THE CURRENT SELECTIONS PLAYED ON MAINSTREAM RADIO. THE SONGS ARE CONSTANTLY UPBEAT AND ENERGETIC, WITH THE ABSENCE OF MINDLESS DJ CHATTER & COMMERCIAL INTERRUPTIONS. I HOPE THE FCC WILL ALLOW THE STATION TO CONTINUE ITS PROGRAMMING AS LONG AS THE FREQUENCY DOES NOT INTERFERE WITH ANY OF THE LICENSED STATIONS. KEEP UP THE GOOD WORK.

[greystarn@email.msn.com](mailto:greystarn@email.msn.com)

I AM WRITING IN SUPPORT OF GRID RADIO. MANY LISTENERS HAVE HEARD ABOUT GRID RADIO BY WORD OF MOUTH AND FIND THE MUSIC BROADCAST BY 96.9 TO THEIR LIKING. THEY FIND COMFORT KNOWING THAT THEY ARE LISTENING TO A STATION THAT IS FRIENDLY TO THEIR SEXUAL ORIENTATION. LISTENERS ARE ABLE TO OBTAIN UP TO DATE COMMUNITY INFORMATION ABOUT EVENTS THAT MAY BE OF INTEREST. SOME OF THE LISTENERS MAY FIND THIS TO BE THE ONLY WAY THAT THEY CAN OBTAIN INFORMATION ABOUT WHAT IS OCCURRING IN THE COMMUNITY.