

LAW OFFICES
HALEY BADER & POTTS P.L.C.
4350 NORTH FAIRFAX DR., SUITE 900
ARLINGTON, VIRGINIA 22203-1633
TELEPHONE (703) 841-0606
FAX (703) 841-2345
E-MAIL: haleybp@haleybp.com

THEODORE D. KRAMER
ADMITTED IN VA AND DC
E-mail: tkramer@haleybp.com

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

OUR FILE NO.
1199-103-63

November 10, 1998

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Notice of Proposed Rulemaking
RM-9290, MM Docket No. 98-159
Bigfork, Montana

Dear Ms. Salas:

On behalf of Alpine Broadcasting Limited Partnership, permittee of Station KSIL(FM), Wallace, Idaho, submitted herewith are an original and four copies of its Reply Comments in response to Comments in Opposition to Notice of Petition For Rulemaking filed by Bee Broadcasting, Inc., in the above-referenced rulemaking.

If there are any questions in regard to this matter, kindly communicate directly with this office.

Very truly yours,


Theodore D. Kramer

TDK:dh
Enclosure

No. of Copies rec'd 0+4
UNASSGDE

ORIGINAL

Before The
Federal Communications Commission
Washington, D.C. 20554

In The Matter Of)
)
Amendment of Section 73.202(b)) MM Docket No. 98-159
of the Commission's Rules,) RM-9290
FM Table of Allotments,)
to Allocate Channel 264C to)
Bigfork, Montana)

TO: Chief, Allocations Branch
Mass Media Bureau

**Reply Comments
of Alpine Broadcasting Limited Partnership**

Alpine Broadcasting Limited Partnership¹ ("Alpine"), by its attorneys, hereby submits its Reply Comments in response to Comments in Opposition to Notice of Proposed Rulemaking ("Comments in Opposition") filed by Bee Broadcasting, Inc. ("BBI") in the above-referenced rulemaking.

I. Introduction

By Petition for Rulemaking filed on February 24, 1998, Alpine, permittee for KSIL(FM), Wallace, Idaho (BPH-960916MD), requested the Commission institute a rulemaking proceeding to amend Section 73.202(b) of the Commission's Rules, the Table of FM Allotments, by deleting Channel

¹ The correct name of Petitioner is Alpine Broadcasting Limited Partnership. The name submitted on the Petition for Rulemaking was a result of a typographical error. A letter was filed with the Commission on January 6, 1998 to correct the name in File No. BPH-960916MD.

264C from Wallace, Idaho, allotting Channel 264C to Bigfork, Montana as that community's first local aural service, and amending Alpine's construction permit to specify Bigfork as its new community of license ("Petition"). On September 4, 1998, the Commission released a *Notice of Proposed Rulemaking* ("*NPRM*") that proposed the requested change to the Table of Allotments and solicited the submission of comments. On October 26, 1998, Alpine submitted Comments and BBI submitted Comments in Opposition to the NPRM.

II. BBI Comments in Opposition

The Commission determines whether a proposed change would serve the allotment priorities better than the status quo "by comparing the proposed allotment plan to the existing allotment plan for the communities involved."² In its Comments in Opposition, however, BBI advances arguments that Alpine's proposed reallocation of 264C to Bigfork is not in the public interest because the public would be better served by a reallocation of channel 264C to Kellogg, Idaho, or by no reallocation at all.³ Whether or not reallocation to Kellogg is preferable to reallocation to Bigfork is simply not an issue in this

² *In the Matter of Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 5 FCC 2d 7094, Memorandum Opinion and Order, RM-6122 (released Nov. 30, 1990), citing the Report & Order, 4 FCC Rcd 4870 (1989).

³ See Comments in Opposition, p. 2.

proceeding, and all of BBI's engineering studies and other material related to Kellogg should be disregarded as completely irrelevant to the analysis in this proceeding.⁴ Moreover, it is axiomatic that the Commission will not consider an allotment to a community where there has been no expression of interest in the proposed allotment.⁵ Neither Alpine nor BBI has any intention of serving Kellogg. BBI's submission of an engineering "counterproposal" is a thinly-veiled attempt to distract the Commission's analysis from the real issue in this rulemaking.

Nor would the Commission's allotment priorities be better served by no reallocation at all, *i.e.* requiring Channel 264C to remain in Wallace, Idaho. As discussed in Alpine's Petition and in its Comments, deletion of Channel 264C from Wallace will not leave Wallace without a local aural service as Station

⁴ Although BBI's Engineering Statement is clearly designed to be a counterproposal to allot Channel 264C to Kellogg, BBI's Comments in Opposition are at best ambiguous as to whether this constitutes a counterproposal at all. It is not captioned a counterproposal, nor does BBI's prayer for relief request that Channel 264C be allotted to Kellogg. Moreover, a counterproposal for the reallocation of Channel 264C to Kellogg would be inappropriate because it would be mutually exclusive to Alpine's existing permit for Wallace.

⁵ See *In re Amendment of Sections 1.420 and 73.3594 of the Commission's Rules Concerning Abuses of the Commission's Processes*, 5 FCC Rcd 3911, 3914 (1990) (parties are required to include an expression of interest in applying for, constructing, and operating the proposed facility if the allotment is made); *c.f. Apalachiola and Carrabelle, Florida*, 6 FCC Rcd. 7147, n. 6 (1991); *Jefferson City, et. al., Virginia*, 10 FCC Rcd. 12207, 12208, n. 5 (1995); *Sanford and Robbins, North Carolina*, 12 FCC Rcd. 1, 3 (1997).

KWAL(AM) is licensed to Wallace.⁶ The reallocation of Channel 264C to Bigfork, however, will permit Bigfork to receive its first FM allocation as well as its first local aural service. Thus, Alpine's plan results in a net service benefit to both communities and advances the Commission's allotment priorities.⁷

Finally, BBI asserts that Alpine's request should be denied because more people in white areas would be served by reallocation to Kellogg, or maintaining the new FM service at Wallace.⁸ As indicated, however, comparison to Kellogg is irrelevant and the assertion that there would be white areas served from Wallace is not supported by BBI's engineering statement.

So why does BBI want Alpine to build its station in Kellogg, Idaho? One answer may be to ward off competition in the Bigfork area as BBI is the licensee of stations KDBR (FM) and KBBZ (FM),⁹ Kalispell, Montana, within

⁶ The Commission recognizes that KSIL(FM) is not a built facility and that any loss in service that may occur from reallocation to Bigfork is potential in nature, but still requests identification of gain and loss areas. *See NPRM* at para 6. This is a theoretical population loss and will not affect actual service to Wallace since an existing local aural service, KWAL(AM), will remain in Wallace. *See Alpine Comments*, p. 5.

⁷ 4 FCC Rcd. 4870, 4873.

⁸ *See Comments in Opposition*, pp. 2-3.

⁹ In its *Comments in Opposition*, BBI states that it is the licensee of KKBZ(FM), Kalispell, Montana. According to the Commission's data base and BBI's webpage, the correct call letters are KBBZ(FM).

the area sought to be served by the proposed reallocation of 264C to Bigfork.¹⁰

III. Errors in BBI Comments

Although BBI states that its Comments in Opposition do not address whether Bigfork is an appropriate “community” for FM allotment purposes, it claims that Bigfork has no police force, no municipal government, no mayor, no chamber of commerce, or identifiable boundaries, and is “merely a seasonal recreational area.”¹¹ These assertions, based on the self-serving sworn statement of BBI’s principal, Benny Bee, Sr., are clearly contrary to fact. Not only does the Bigfork Area Chamber of Commerce exist, BBI’s affiliate, Bee Broadcasting Radio Network, is a dues-paying member as is evidenced by its listing in the Chamber’s business directory.¹² As the Chamber of Commerce

¹⁰ BBI’s facilities will not be affected whatsoever by Alpine’s proposal to reallocate Channel 264C to Bigfork, Montana. In its Comments in Opposition, BBI does not state any intention to upgrade or change its facilities in any manner that might be inhibited by Alpine’s proposal. Nor does BBI propose to apply for and construct any new facilities that would be affected by Alpine’s proposal. BBI is simply trying to limit competition in its stations’ service area.

¹¹ See Comments in Opposition, pp. 2-3.

¹² See Bigfork Area Business Directory, published by the Bigfork Area Chamber of Commerce, attached hereto as Exhibit 1. According to the Chamber, all businesses who pay membership dues to the Chamber are listed in the directory. Although Alpine does not know the specific business relationship between BBI, Inc. and BBI Broadcasting Radio Network, the phone number, (406) 862-5565, is the same phone number listed in the Broadcasting and Cable Yearbook for KBBZ(FM), Kalispell, Montana and KJJR(AM), Whitefish Montana. In addition, the website for “Bee Broadcasting Network, Inc.” lists KBBZ(FM), KJJR(AM), KDBR(FM) and KKMT(FM) as its radio network. See selected pages from <http://www.beebroadcasting.com> attached hereto as Exhibit 2.

states in its extensive business directory, “throughout the year, Bigfork offers fine arts, gourmet dining, fun stores, great day and evening activities and a full line of accommodations ranging from ranches and rustic cabins to bayside condos.” [It was voted] as “One of the 50 Great Towns of the West” and designated as “one of the 100 Best Small Art Towns of the Nation. . .”¹³ This statement by the Chamber of Commerce as well as the extensive listing of businesses and services in its directory is a clear expression of community status and that the “residents function as and conceive of themselves as residents of a community, around which their interests coalesce.”¹⁴ Indeed, the Chamber directory lists over *125* businesses, associations and services identified as being located in Bigfork. If Bigfork is not a community worthy of an FM allotment, what interest does BBI have in being listed in the Bigfork business directory? In addition, even Mr. Bee concedes that Bigfork has its own school system.

Although BBI accurately states that Bigfork is an unincorporated place in Flathead County, Montana, it incorrectly states that “there is no hard evidence regarding the population of Bigfork because there are no

¹³ From the books entitled “one of the 50 Great Towns in the West” and “100 Best Small Art Towns in the West, John Muir Publications, 1996.

¹⁴ *North Naples, Florida*, 41 RR 2d 1549, 1551 (1977); *Mighty-Mac Broadcasting Co.*, 101 FCC 2d 303, 306 (1985); *Gretna et. al., Florida*, 6 FCC Rcd. 633 (1991).

boundaries.”¹⁵ As shown in Alpine’s Comments, the 1990 U.S. Census lists the population of Bigfork as 1,461.¹⁶ Furthermore, the population in Bigfork continues to grow. In a brochure produced by Travel Montana, the Department of Commerce, and Glacier County Tourism, the winter population is listed as 3,500 while the summer population soars to 10,000.¹⁷ Finally, the fact that the boundaries of Bigfork may not be precisely ascertainable is not “most significant” as asserted by BBI, where as here, there is ample evidence of community self-definition.¹⁸

IV. Conclusion

Alpine continues to believe that its proposal to allot Channel 264C to Bigfork, Montana, as its first FM allocation, as well as its first local aural service, is consistent with the Commission’s policy and would serve the public interest. If Channel 264C, is added at Bigfork, Montana, Alpine will promptly file an application for modification of its construction permit for a new FM station on that channel, and will promptly construct the modified facilities

¹⁵ See Sworn Statement of Benny Bee, attached to Comments in Opposition as Appendix A.

¹⁶ See Alpine Comments, p. 3 and Ex. 3 attached thereto.

¹⁷ See Alpine Comments, Ex. 5.

¹⁸ See 6 FCC Rcd. at 633.

after its application is granted. Accordingly, Alpine reaffirms its request to reallocate Channel 264C to Bigfork, Montana and amend Alpine's construction permit to specify Bigfork as its new community of license.

Respectfully submitted,

**Alpine Broadcasting Limited
Partnership**



Theodore D. Kramer

Lisa M. Patera

Its Attorneys

HALEY BADER & POTTS P.L.C.
Suite 900
4350 North Fairfax Drive
Arlington, VA 22203-1633
703/841-0606
November 10, 1998

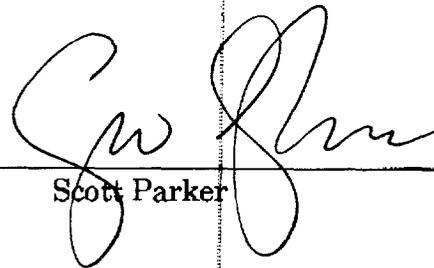
DECLARATION OF SCOTT PARKER

I, Scott Parker, do declare under penalty of perjury, as follows:

I am the General Partner of Alpine Broadcasting Limited Partnership. I have reviewed Alpine's Comments filed October 25, 1998 and the foregoing Reply Comments and accompanying Attachments to be filed with the Commission. I believe the facts stated therein are true and correct.

If the Commission allots Channel 264C to Bigfork, Montana, Alpine will promptly file an application for modification of its construction permit for a new FM station on that channel and will promptly construct the modified facilities after its application is granted.

Alpine does not intend to file an application to serve the community of Kellogg, Idaho.



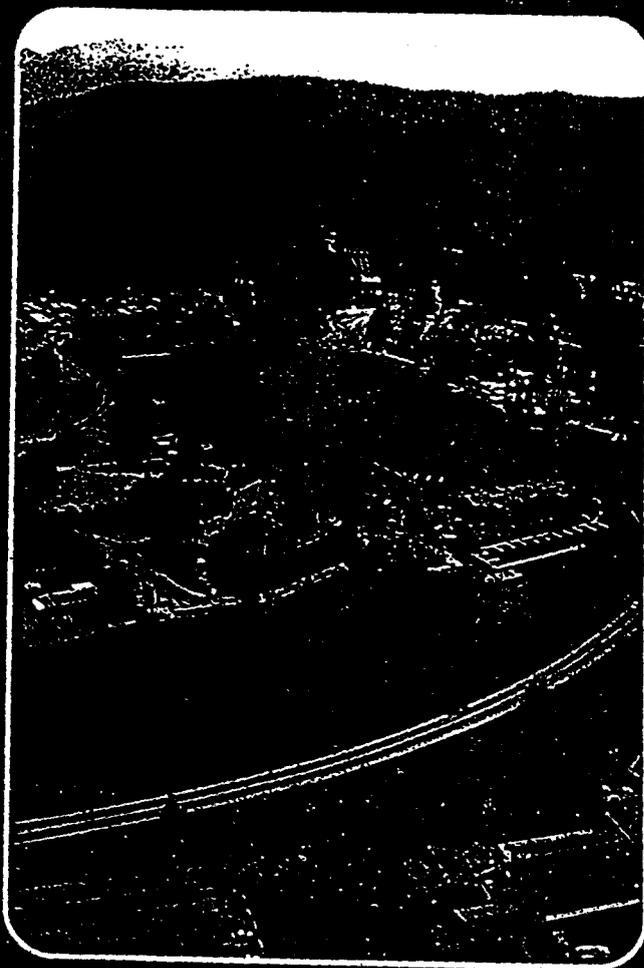
Scott Parker

Dated: November 9, 1998

EXHIBIT 1

BIGFORK AREA BUSINESS DIRECTORY

1996



BIGFORK AREA CHAMBER OF COMMERCE

Box 237

Bigfork, Montana 59911

(406) 837-5888

FAX (406) 837-5808

BIGFORK

"Village by the Bay"

Located at 2,900 feet above sea level, Bigfork is situated beside a sparkling blue bay where the wild, white waters of the Swan River run into Flathead Lake. With more than 180 miles of shoreline, Flathead Lake is the largest natural freshwater lake west of the Mississippi, and it provides visitors with challenging fishing, sailing, and a variety of other water sports. Bigfork's picturesque village offers everything from world-class galleries, and creative dining to the Bob Marshall and Swan Wilderness areas that offer wildlife and outdoor sports to thrill any enthusiast.

Bigfork is home to Eagle Bend Golf Course which has been rated by many as one of the most challenging and beautiful golf courses in the nation. Also in Bigfork is the Bigfork Summer Playhouse which is celebrating it's 37th year as one of the Northwest's finest repertory theatres.

Throughout the year, Bigfork offers fine arts, gourmet dining, fun stores, great day and evening activities and a full line of accommodations ranging from ranches and rustic cabins to basic condos. Voted as "One of the 50 Great Towns of the West" and designated as "One of the 100 Best Small Art Towns of the Nation", Bigfork offers you and your family a part of the West that you will never forget.

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Bigfork Chamber Business Members

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Bigfork, MT 59911
ph: (406) 837-4995
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Bigfork Summer Playhouse
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PO Box 456
Bigfork, MT 59911
ph: (406) 837-4886

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Bigfork, MT 59911
ph: (406) 837-3839

Buffalo Trails
Art Emporium
7583 Hwy 35 (north Bigfork)
Bigfork, MT 59911
ph: (406) 837-3790
Gallery of original art.

The Gallery Suites
PO Box 1380
Bigfork, MT 59911
ph: (406) 837-2288

Kootenai Galleries
573 Electric Avenue
PO Box 400
Bigfork, MT 59911
ph: (406) 837-4848
fax: (406) 837-6730
*Western fine art of significance,
since 1976.*

GOVERNMENT AGENCIES

U.S. Postal Service
8165 Hwy 35
Bigfork, MT 59911
ph: (406) 837-4479

Rural Employment
Opportunities, Inc.
307 1st Avenue East #20
Kalispell, MT 59903
ph: (406) 752-7208
fax: (406) 752-7209
*Career re-training opportunities for
seasonal ag workers.*

MEDIA

Bee Broadcasting
Radio Network
PO Box 880
Whitefish, MT 59937
ph: (406) 862-5565

Bigfork Eagle
8293 Hwy 35
PO Box 406
Bigfork, MT 59911
ph: (406) 837-5131
fax: (406) 837-1132
marcus@netrix.net
*Award-winning weekly newspaper
and Internet advertising on electronic
Eagle.*

Daily Inter Lake
PO Box 8
Kalispell, MT 59903
ph: (406) 755-7000
Daily valley-wide newspaper.

Homes & Land Magazine
730 Tally Lake Road
Whitefish, MT 59937
ph: (406) 862-0702

KOFI Radio
PO Box 608
Kalispell, MT 59901
ph: (406) 755-6690

Lakeshore Country Journal
8297 Hwy 35
Bigfork, MT 59911
Jan Krause/Jim Jackson
ph: (406) 837-2230
fax: (406) 837-2239
E-mail: JRJACK@digisys.net
A Bi-weekly good news journal.

TCI Cablevision
of Montana
333 1st Avenue East
Kalispell, MT 59901
ph: (406) 755-7200
fax: (406) 755-7204
Cable television entertainment.

MEDICAL/DENTAL

Bigfork Dental Center PC
8289 Hwy 35
Bigfork, MT 59911
ph: (406) 837-5611
Gary R. McCrummen, DDS, modern dentistry for all ages.

Bigfork Medical Clinic
8259 Hwy 35
Bigfork, MT 59911
ph: (406) 837-5541
Thomas G. Jenko, MD and John Van Arendonk, MD - family practice.

PROFESSIONAL SERVICES

Allways Travel
PO Box 987
Bigfork, MT 59911
ph: (406) 837-5411
fax: (406) 837-5460
awtravel@netrix.net
Full service travel agency; air, cars, cruises, tours, hotels.

Anchor Alarms
99 Pierce Lane
PO Box 736
Bigfork, MT 59911
ph: (406) 837-5533
fax: (406) 837-5584
Fire, low temperature, water leak and security protection.

Chrysler & Gordon,
CPA's, PLLC
120 Village Lane
PO Box 738
Bigfork, MT 59911
ph: (406) 837-5461
fax: (406) 837-5464
Serving Bigfork's accounting and tax needs.

Dann Taylor, AIA Architect
470 Electric Avenue
PO Box 1423
Bigfork, MT 59911
ph: (406) 837-2051
fax: (406) 837-2083
Environmentally and energy conscious custom home design.

Falcon Enterprises
PO Box 747
Bigfork, MT 59911
ph: (406) 837-3764
fax: (406) 837-3764
A full service film, video, and still photography production company.

Flathead Insurance
PO Box 219
Bigfork, MT 59911
ph: (406) 837-5562
fax: (406) 837-1056
ionymrtin@digisys.net
Independent agents, all types of insurance.

Flathead Travel
PO Box 1544
Bigfork, MT 59911
ph: (406) 837-4999

Insty-Prints
131 Main Street
Kalispell, MT 59901
ph: (406) 752-8812

Lake View Care Center
1050 Grand Avenue
Bigfork, MT 59911
ph: (406) 837-5041
Long-term care and out-patient therapy.

Nagelhus & Co.
PO Box 428
Bigfork, MT 59911
ph: (406) 837-6639
fax: (406) 837-4900
nagel@cyberport.net
Office rental space available.

Nana's Little
Flathead Monsters
PO Box 1702
Bigfork, MT 59911
ph: (406) 837-2273

National Mortgage Co.
PO Box 509
Bigfork, MT 59911
ph: (406) 837-5121
fax: (406) 837-5135
Financial contract brokerage.

Nelson Electric, Inc.
PO Box 1260
Bigfork, MT 59911
ph: (406) 837-5558
fax: (406) 837-5536
Commercial, residential, industrial and generator work.

Nifty Needle & Notions
Lake Hills Shopping Center
PO Box 1156
Bigfork, MT 59911
ph: (406) 837-6303
Alterations, dressmaking, repairs and sewing notions.

Northwest
Management Inc.
PO Box 2395
Bigfork, MT 59911
ph: (406) 253-8182
Personal property management.

Paragon Consulting, Inc.
165 Landmark Lane
Bigfork, MT 59911
ph: (406) 837-6010
fax: (406) 837-6410
Management and organizational consulting.

Protective Services
PO Box 544
Bigfork, MT 59911
ph: (406) 756-4774
ph: (406) 752-3578
Security, fire, and CC TV systems, security patrol and guard services.

Robert Thomas Securities
PO Box 714
Bigfork, MT 59911
ph: (406) 837-2600

Smith & Smith, CPAs
8543 Hwy 35
PO Box 276
Bigfork, MT 59911
ph: (406) 837-2CPA
fax: (406) 837-2FAX
Taxes, financial statements, 1031 exchanges.

Snyder & Noble, PC
PO Box 717
Bigfork, MT 59911
ph: (406) 837-4383
fax: (406) 837-4385
General practice of law.

Sundance Video
Productions
PO Box 2007
Bigfork, MT 59911
ph: (406) 837-0333
Video production.

Tenth Dimension
Investments
197 Sylvan Drive
Bigfork, MT 59911
ph: (406) 837-2112
fax: (406) 837-2118
gsnaive@digisys.net
*Registered investment advisor
"Sensible advice for financial investments".*

Thomas Hoover, Attorney
PO Box 247
Bigfork, MT 59911
ph: (406) 837-6091

Thomas Printing, Inc.
38 6th Avenue West
Kalispell, MT 59901
ph: (406) 755-5447
fax: (406) 755-5449
*High-quality commercial printing -
process color.*

Weese Enterprises
PO Box 826
Bigfork, MT 59911
ph: (406) 837-4225
shirleen@cyberport.net
*Retail and office space rentals in
downtown Bigfork.*

Western States Insurance
255 Bridge Street
PO Box 160
Bigfork, MT 59911
ph: (406) 837-5281
fax: (406) 837-3540
*Property, casualty and life/health
insurance.*

REAL ESTATE

Bigfork Realty
8570 Hwy 35
PO Box 1076
Bigfork, MT 59911
ph: (406) 837-5300
fax: (406) 837-5303
bcrealty@digisys.net
*Friendly, full service real estate office,
est. 1962.*

Bowd & Associates Real
Estate
PO Box 773
Bigfork, MT 59911
ph: (406) 837-2200
fax: (406) 837-2201
*Selling Flathead Valley property for
over 21 years.*

Chuck Olson Real Estate
of Bigfork
8090 Hwy 35
PO Box 672
Bigfork, MT 59911
ph: (406) 837-5551
fax: (406) 837-5552
*Serving the real estate needs of the
Bigfork area since 1980.*

Coldwell-
Banker/Wachholz
710 Grand Drive
Bigfork, MT 59911
ph: (406) 837-1234
fax: (406) 837-1235
chwcbl@digisys.net
*Serving all your Flathead Valley real
estate needs.*

Dean & Leininger
836 Holt Drive
PO Box 249
Bigfork, MT 59911
ph: (406) 837-7333
fax: (406) 837-7344
*Agents for fine properties - town-
homes, homes and land.*

Eagle Bend Rental &
Property Management
836 Holt Drive
PO Box 374
Bigfork, MT 59911
ph: (406) 837-0323
fax: (406) 837-0322
*Fully equipped vacation rentals at
Eagle Bend and other locations.*

K-M Management, Inc.
300 Bridge Street
Bigfork, MT 59911
ph: (406) 837-4550

Mary Margaret Designer
Showroom
570 Electric Avenue
PO Box 1779
Bigfork, MT 59911
ph: (406) 837-6175
fax: (406) 837-6199
*Interior design services and retail
design showroom.*

Montana
Real Estate Group
PO Box 216
Bigfork, MT 59911
ph: (406) 837-6000

Paulson Real Estate
444 Electric Avenue
PO Box 1408
Bigfork, MT 59911
ph: (406) 837-6100
fax: (406) 837-6141
*Your "hometown" real estate firm
capable of serving all your real estate
needs.*

RE/MAX of Bigfork
PO Box 725
Bigfork, MT 59911
ph: (406) 837-5531
fax: (406) 837-5169
*We love Montana.
Let us show it to you!*

Silvertip Land & Real
Estate
PO Box 45
Bigfork, MT 59911
ph: (406) 837-3336
fax: (406) 837-3339

Trails West Realty/Better
Homes & Gardens
240 Electric Avenue
Bigfork, MT 59911
ph: (406) 837-6220
fax: (406) 837-3624
trailswt@digisys.net
*Professionally serving you for 25
years.*

RECREATION

A Able Fishing Charters
63 Twin Acres
Kalispell, MT 59901
ph: (406) 257-5214
"Shorty makes memories happen".

Bayview Resort & Marina
543 Yenne Point Road
Bigfork, MT 59911
ph: (406) 837-4843
1-800-775-3536
*Family resort, lakeview accommoda-
tions w/fully equipped kitchens, maid
service. Boat rentals, tackle shop,
marine fuel and lake swimming area.*

The Big Mountain
PO Box 1400
Whitefish, MT 59937
ph: (406) 862-3511

Bigfork Outdoor
Expeditions
Guy Shanks or Elizabeth Pazerla
PO Box 213
427 Sunburst Drive
Bigfork, MT 59911
ph: (406) 837-2031
Outfitter

Diving With Mike
PO Box 8055
Columbia Falls, MT 59912
ph: (406) 892-4751
fax: (406) 892-3240
*Dive with Mike and enjoy the under-
sea frontier.*

Eagle Bend
Golfing Community
279 Eagle Bend Drive
Bigfork, MT 59911
ph: (406) 837-7311
ph: (406) 837-7399
fax: (406) 837-7348
*Montana's #1 golf course, marina,
restaurant and beautiful homesites.*

Glacier Raft Co.
PO Box 218
West Glacier, MT 59936
ph: (406) 888-5454

Marina Cay Resort
180 Vista Lane
PO Box 663
Bigfork, MT 59911
ph: (406) 837-5861
1-800-433-6516
fax: (406) 837-1118
*Full service marina, boats, gas, wave
runners, ski, fishing boats, sports
equipment. Discount if staying in
hotel. Open to public. Parasailing,
wooded boat for lake cruise. Winter
sports arranged.*

Montana Athletic Club
Holt Drive
PO Box 337
Bigfork, MT 59911
ph: (406) 837-2582
fax: (406) 837-2588
*Flathead Valley's leading fitness
facility.*

Miss Kitty's
470 Electric Avenue
Bigfork, MT 59911
ph: (406) 837-0777
fax: (406) 837-0777
Romantic western apparel.

Nifty Needle & Notions
Lake Hills Shopping Center
PO Box 1156
Bigfork, MT 59911
ph: (406) 837-6303
Alterations, dressmaking, repairs and sewing notions.

Office Stop
700 Sunset Blvd.
Kalispell, MT 59901
ph: (406) 752-8655
fax: (406) 752-8651
Full line office supplies, furniture, machines, sales and service.

Pufferbelly's Classic Toys
470 Electric Avenue
Bigfork, MT 59911
ph: (406) 837-5620
sarahmg@selway.umn.edu
Old fashioned classic toys and a wide variety of toys to fascinate all ages.

Roma's
470 Electric Avenue
PO Box 1423
Bigfork, MT 59911
ph: (406) 837-2332
fax: (406) 837-2803
An intriguing shop for cooks - tools and accessories and gourmet treats.

Sportsman & Ski Haus
40 East Idaho
Kalispell, MT 59901
ph: (406) 755-1591
fax: (406) 755-5661
All types of sporting goods, clothing, and shoes.

Swan River Trading Co.
459 Electric Avenue
Bigfork, MT 59911
ph: (406) 837-4121
fax: (406) 837-4120
Furnishings and gifts of western elegance and rustic charm.

The Jug Tree, (BF Liquors)
Electric Avenue
PO Box 34
Bigfork, MT 59911
ph: (406) 837-6077

The Stone Chair
459 Electric Avenue
Bigfork, MT 59911
ph: (406) 837-2717
fax: (406) 837-2718
Antiques and vintages for house and garden.

Victorian Treasures
Hwy 35
PO Box 1112
Bigfork, MT 59911
ph: (406) 837-3716
A beautiful florist and gift shop.

Viki's Montana Classics
801 Grand Avenue
PO Box 85
Bigfork, MT 59911
ph: (406) 837-5545
1-800-248-1222
fax: (406) 837-5545
Retail, wholesale, manufacturing of flavor syrups, preserves, vinegars and dessert sauces.

Wild Birds Unlimited
426 Electric Avenue
Bigfork, MT 59911
ph: (406) 837-2473
Nature related gifts, bird feeders, books, music.

SCHOOLS

Bigfork Public Schools
PO Box 188
Bigfork, MT 59911
ph: (406) 837-7400
fax: (406) 837-7407
Elementary, Junior & Senior High Public School.

Flathead Valley Community College
777 Grandview Drive
Kalispell, MT 59901.
ph: (406) 756-3822
fax: (406) 756-3815
FVCC, an opportunity to learn and a partner in economic development.

SERVICES

Bigfork Library
Electric Avenue
PO Box 472
Bigfork, MT 59911
ph: (406) 837-6976
Hours: Tues 12-5, Wed 10-7, Thurs and Fri 12-5, Sat 1-5, closed Sun and Mon.

Cellular One
120 East Idaho
Kalispell, MT 59901
ph: (406) 257-2355
fax: (406) 257-2377
Montana's best cellular service provider.

City Service, Inc.
1645 Hwy 93 South
PO Box 1
Kalispell, MT 59901
ph: (406) 755-4321
fax: (406) 756-8591
Wholesale distributor of petroleum products Northwest/CFN Fuel Card.

Coca-Cola Bottling Company
230 South Complex Drive
Kalispell, MT 59901
ph: (406) 755-2653

Flathead Beverage Co.
PO Box 1038
Kalispell, MT 59901
ph: (406) 755-4203
fax: (406) 756-3452
Distributors of Anheuser-Busch products.

Fun Beverage, Inc.
3455 Hwy 93 South
Kalispell, MT 59901
ph: (406) 752-1455
fax: (406) 752-5678
Wholesale beverage distributor.

Pepsi-Cola Bottling/Kalispell
101 Kelly Road
Kalispell, MT 59901
ph: (406) 755-5060
fax: (406) 755-5010
Wholesale soft drink distributor.

PTI Communications
290 North Main Street
Kalispell, MT 59901
ph: (406) 758-1000
fax: (406) 758-1414
Telecommunications services.

The Washboard
8270 Hwy 35
Bigfork, MT 59911
ph: (406) 837-2131
Drop-off, dry cleaning, RV dump and coin laundry.

UTILITIES

Bigfork County Water & Sewer
PO Box 1108
Bigfork, MT 59911
ph: (406) 837-4566

Flathead Electric Coop, Inc.
2510 Hwy 2 East
Kalispell, MT 59901
ph: (406) 752-4483
fax: (406) 752-4283
jbrobst@digisys.net
Reliable electric service (to Co-op members) at the lowest possible cost.

Flathead Muni Air Authority
4170 Hwy 2 East
Kalispell, MT 59901
ph: (406) 257-5994
Glacier Park International Airport (FCA).

Northwest Disposal Service
PO Box 326
Bigfork, MT 59911
ph: (406) 837-4153
Pick up all residential and commercial trash in the Bigfork area.

Pacific Power & Light
PO Box 232
Bigfork, MT 59911
ph: (406) 837-4371

EXHIBIT 2



NORTHWEST MONTANA'S MOST EFFECTIVE ADULT MARKETING NETWORK

18-34 Age Group Demographics

25-54 Age Group Demographics

35-54 Age Group Demographics

AM Demographics

Station Bios

info@beebroadcasting.com

B98 • KJJR • KDBR • KKMT

NORTHWEST MONTANA'S MOST LISTENED TO RADIO NETWORK

Flathead Valley's Best Radio Combination

© Bee Broadcasting Network, Inc. © [DigiSys, Inc.](http://www.digisys.com)

P.O. Box 5409, Kalispell, MT 59903 (406) 755-8700

(406) 756-5557 (**KJJR**), (406) 257-5327 (**KDBR**)

(406) 755-7625 (**KBBZ**), (406) 257-6686 (**KKMT**)

Fax (406) 755-8770, **Cellular** (toll-free) *BEE



NORTHWEST MONTANA'S MOST EFFECTIVE ADULT MARKETING NETWORK

B98 FM • KBBZ! The Flathead's Best Rock-n-Roll! Featuring classics based adult Rock-n-Roll. Target Demo: Adults 25-54, 60% Male to 40% Female ratio. A localized, custom produced Rocky Mountain blend of timeless Rock-n-Roll with today's hand picked favorites strategically designed to appeal to Northwest Montana's unique musical tastes and lifestyles. B98's good time Rock-n-Roll reputation combined with seasoned on-air talent, booming signal, superb fidelity, cutting edge quality production, unending promotion and uncluttered delivery makes KBBZ the Flathead Valley's leading radio favorite and perennial ratings winner!

880 AM • KJJR! The Flathead Valley's only full service News/Talk station! Target Demo: Adults 25-54. News/Talk is the most "switched to" format in America and KJJR is the only one of it's kind in Northwest Montana. Market exclusive with the ABC Information Network, Paul Harvey, Rush Limbaugh, Mike Reagan, Dr. Laura, Art Bell, local talk topics on "Montana Talk" plus a host of features from the highly regarded Associated Press and ESPN Radio Networks. 24 hours a day, KJJR News/Talk Radio is specifically designed to appeal to the area's highest earning and educated population sector... the people who can afford what you want them to buy!

106.3 FM • KDBR "The Bear!" The Flathead's Best Country featuring today's hot country and yesterday's all time favorites! Target Demo: Adults 25-54, 60% Female to 40% Male ratio. Featuring fun in the morning and 10-in-a-row every hour. KDBR signed on the air on November 2, 1993 and instantly became the Flathead Valley's #1 Country FM by a 2-to-1 margin. "The Bear" is located in one of the Country's most up-to-date Broadcast Centers featuring all digital programming. "The Bear" employs energetic, veteran broadcasters, who know, live, and love the Flathead Valley. Top flight production that sells, promotions that work and lots of fun on the radio make "The Bear" the Flathead's Best Country!

95.9 FM • KKMT "The Mountain" After extensive research, Bee Broadcasting realized that a station playing the lighter side of the Valley's music favorites was missing from the overall Radio picture. The solution: KKMT "The Mountain" offers listeners a core of music artists ranging from Elton John, Celine Dion, Neil Diamond and Michael Bolton to Mariah Carey, Phil Collins, James Taylor, Whitney Houston and many more. Targeting females 30-54, KKMT gives you the opportunity to reach one of the most sought after demographics.

B98 • KJJR • KDBR • KKMT
NORTHWEST MONTANA'S MOST LISTENED TO RADIO NETWORK

CERTIFICATE OF SERVICE

The undersigned, an employee of Haley Bader & Potts P.L.C., hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, or was hand-delivered*, to the following:

* John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Federal Communications Commission
2000 M Street, N.W., Room 554
Washington, D.C. 20554

* Nancy Joyner
Policy & Rules Division
Mass Media Bureau
2000 M Street, N.W., Room 557
Washington, D.C. 20554

Robert Lewis Thompson
Taylor Thiemann & Aitken, L.C.
908 King Street, Suite 300
Alexandria, VA 22314

Counsel for Bee Broadcasting, Inc.

A handwritten signature in cursive script, reading "Sarah L. Hood", is written over a horizontal line.

November 10, 1998