

BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D.C.

IN THE MATTER OF: )  
 )  
*Amendment of 47 C.F.R. §73.202(b)* )  
*Table of FM Allotments* )  
(Tipton, Mangum & Eldorado, OK) )  
 )  
To: The Chief, Allocations Branch )  
Policy and Rules Division )

MM DOCKET No. 99-23  
RM-9423

**RECEIVED**  
MAR 15 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**COMMENTS AND COUNTERPROPOSAL OF  
TEXAS GRACE COMMUNICATIONS**

Comes now **Texas Grace Communications**, ("Texas Grace"), by Counsel, and pursuant to Section 1.415 of the Commission's Rules, hereby respectfully submits the following Comments and Counterproposal in response to the Commission's *Notice of Proposed Rule Making and Order to Show Cause*, ("NPRM"), released January 22, 1999, in the above-captioned proceeding. The referenced NPRM proposes allocation of Channel 249 C2 to Tipton, Oklahoma; the substitution of Channel 282A for Channel 249A for Radio Station KHIM (FM), Mangum, Oklahoma; and the further substitution Channel 245A for Channel 246A for the vacant allocation at Eldorado, Oklahoma. In response to the NPRM, the following is shown:

***Background***

1. Texas Grace<sup>1</sup>, the Permittee of Radio Station KRZB (FM), Archer City, Texas, by counsel timely submits its Comments and Counterproposal in the above-referenced proceeding.

No. of Copies rec'd 074  
List A B C D E

<sup>1</sup> Comments due by March 15, 1999. See NPRM at page 3.

2. Under the above-referenced proceeding, the Petitioner, Good Government Radio ("GGR") proposed in its Petition for Rule Making (filed November 20, 1998), what Texas Grace shall clearly demonstrate, is an unnecessarily disruptive, circuitous scheme to allot a first local aural service to the Community of Tipton, Oklahoma, utilizing Channel 249 C2.

***Texas Grace Supports Service at Tipton, But Without Needless Channel Substitutions or Disruptions to Other Entities***

3. Texas Grace wishes to firmly state that Tipton, Oklahoma *does* merit a first local service, and should be afforded provision of such service. However, this can be readily accomplished without the needless disruption to operating station KHIM (FM), Mangum, Oklahoma (which the GGR scheme requires be moved from Channel 249A to Channel 282A), as well as without needless Commission reallocation of the vacant Eldorado, Oklahoma service (which the GGR scheme requires be moved from Channel 246A to Channel 245A).

***Texas Grace's Counterproposal--A Much More Efficient, Direct Allocation for Tipton Service Available***

4. By its Counterproposal, Texas Grace respectfully requests that the Commission instead make use of a readily available, much more efficient ***direct allocation*** for the Tipton, Oklahoma service, by using alternative Channel 275 C2.

5. The attached Technical Exhibit<sup>2</sup> clearly demonstrates the availability of such alternate Channel 275 C2 service for Tipton, as well as the fact that its' utilization

---

<sup>2</sup> Attached hereto is Texas Grace's Technical Exhibit prepared by R. Lee Wheeler of Wheeler Broadcast Consulting. Note that this exhibit is submitted in facsimile form and shall be supplemented in original form shortly hereafter.

will require absolutely no channel substitutions for, nor disruptions to, other services or allotments.

6. The issue of employing a direct allocation for Tipton, versus one that requires needless channel substitutions and disruption to other services and allotments, is noteworthy here, in that the Commission has customarily held that, when available, a direct allocation should be utilized. The direct allocation on Channel 275 C2 is thus consistent with the Commission's policies set forth in *Revision of the FM Assignment Policies and Procedures, 90 FCC Rcd. 2d 88 (1982)*, and with *Section 307(b) of the Communications Act, as Amended*, providing fair, efficient and equitable distribution of radio services in the United States.

7. Utilization of such a direct allocation simply makes the most efficient use of the Commission's mandate under the *Communications Act*, and serves the public interest by not causing unnecessary disruption or inconvenience to other broadcast service providers, or to members of the public who depend on such service. In contrast, utilization of GGR's indirect allocation unnecessarily burdens the Commission's time and workload, requiring such additional tasks as issuance of a "show cause" order to an existing operator (Radio Station KHIM (FM)) to change channel, when absolutely no such channel changes is necessary.

***The Texas Grace Counterproposal to Utilize Channel  
275 C2 for Tipton Service, Ensures A Less Cumbersome  
Site Restriction for the Tipton Facility***

8. Beyond effectuating two unnecessary channel substitutions, the circuitous GGR scheme also needlessly imposes a more cumbersome site restriction upon the prospective facilities site which would be built to provide the Tipton service. As demonstrated in the Technical Exhibit, employing Channel 249 C2 for Tipton (as requested by GGR),

imposes a site restriction of 23.6 km, whereas the Channel 275 C2 *direct allocation* necessitates only an 18.8 km site restriction, thereby allowing for a transmission site closer to the subject service community.

9. Texas Grace therefore respectfully requests that the Commission accordingly allocate first local service to Tipton, Oklahoma on the demonstrably more practical, efficient and direct allocation frequency afforded by Channel 275 C2.

***Other Provisions of Texas Grace's Counterproposal:  
Service Upgrade for KRZB (FM), Archer City Texas  
from Channel 248 C2 to 248 C1 and Allocation of  
First Aural Service for Granite, Oklahoma on  
Channel 282 C3***

10. In conjunction with utilizing Channel 275 C2 for the Tipton service, Texas Grace proposes to upgrade the service it will provide through KRZB (FM), Archer City, Texas from the presently allotted Channel 248 C2, to Channel 248 C1, serving its same community of license; and to allocate a new, first aural service to the community of Granite, Oklahoma on Channel 282 C3.

11. The benefits to the public interest generated by upgrading KRZB (FM) from Channel 248 C2 to Channel 248 C1, and by allocating a first aural service on Channel 282 C3 to Granite, Oklahoma are compelling and well-founded, and would clearly result in a superior arrangement of allotments as contemplated by *Section 307(b)* of the *Communications Act*. Moreover, both the KRZB (FM) service upgrade, and the establishment of first local service to Granite, Oklahoma, can be accomplished with absolutely no channel substitutions required, in full compliance with the Commission's engineering criteria.

***Upgrading Service of KRZB (FM) Archer City, Texas is  
Clearly in the Public Interest***

12. By virtue of amending the Table of Allotments to allow for upgrading of the KRZB (FM) service from that provided by Channel 248 C2, to Channel 248 C1, Texas Grace will be able to provide additional reception service to an overwhelming 92.45 percent additional geographical area, as well as to nearly 26 percent additional population, equating to 34,798 more persons, as demonstrated in the attached Technical Exhibit.

13. As the Technical Exhibit demonstrates, the geographic area gained is especially significant, in that the predominant gain region lies within rural, under served areas. From a population standpoint, the U.S. Census indicates that 168,901 persons would now be able to utilize the upgraded KRZB service.

14. At the same time, the Texas Grace Technical Exhibit indicates that the primary service community, Archer City, would continue to receive signal coverage well in excess of 70 dBu upon institution of Channel 248 C1 service.

15. The Commission database of March 10, 1999 indicates that provision of KRZB service on the upgraded Channel 248 C1 can be accomplished with absolutely no channel substitutions required, with no disruption to presently licensed or permitted facilities, and therefore with no service interruption imposed on the public.

***Provision of a First Local Aural Service for Granite,  
Oklahoma on Channel 282 C3 is Clearly in the Public  
Interest***

16. The community of Granite, Oklahoma is a community most deserving of its own local aural service, which will be accomplished under the Texas Grace counterproposal herein.

17. Granite, Oklahoma is an incorporated community with a 1990 U.S. Census Population of 1,844 persons. Granite has a Mayor and a City Council form of local government, maintains its own Police and Fire Departments, and provides

municipal water, gas, electric and sewer service to its citizens. Education is provided residents through the Granite City School District. Granite boasts several civic organizations, including a local Lyons Club, and Women's ESA Club. The Granite Chamber of Commerce coordinates economic development.

18. Along with providing a vital first local service to the residents of Granite, Oklahoma, the new service on Channel 282 C3 would provide an additional reception service to 41,943 persons.

19. The Commission database of March 10, 1999 indicates that provision of first aural service to Granite, Oklahoma on Channel 282 C3 can be accomplished with absolutely no channel substitutions required, with no disruption to presently licensed or permitted facilities, and therefore with no service interruption imposed on the public.

***The Texas Grace Counterproposal Offers Far Superior Usage of Channel 282 C3, Than Does the GGR Scheme as Adopted in the NPRM***

20. As the Commission explained in *Revision of FM Assignment Policies and Procedures, 90 FCC Rcd 88 (1982)*, provision of "first full-time aural service" constitutes the top FM Allotment priority. Allocation of the new Channel 282 C3 service at Granite, Oklahoma as counter proposed by Texas Grace clearly meets such Commission priority.

21. In contrast, GGR's disruptive allocation plan would wastefully employ Channel 282 A as a substituted channel for KHIM, Mangum Oklahoma (presently on Channel 249 A), even though such a substitution and disruption, as demonstrated, is absolutely unnecessary for achieving GGR's stated goal of establishing a first local service at Tipton, Oklahoma.

22. As the Commission can see, the Texas Grace counterproposal not only precludes the need for such channel substitution and show cause order proceeding, but also serves a viable, top Commission priority in its proposed utilization of Channel 282 C3 to give Granite, Oklahoma its well-deserved first local aural service.

***Texas Grace Will Apply for the Proposed New Facility at Granite, Oklahoma***

23. Upon Commission allocation of Channel 282 C3 service for Granite, Oklahoma, and subsequent opening of a filing window, Texas Grace will file for a construction permit to operate the new facility, and if designated by the Commission as the successful applicant, will promptly construct the facility.

***The Texas Grace Counterproposal Offers Far Superior Usage of Channel 248 C1 at Archer City, Texas (for KRZB), Than Does the GGR Scheme Requesting Channel 249 C2 Service at Tipton, Oklahoma as Proposed in the NPRM***

24. The Texas Grace Counterproposal clearly demonstrates that Channel 249 C2 need not, and should not, be utilized for service provision at Tipton, Oklahoma, in light of the fact that: a much more efficient and practical alternative channel, 275 C2, will allow for a direct allocation to Tipton, with a less cumbersome site restriction than usage of Channel 249 C2 would require, and without any channel substitutions needed; and, a far superior arrangement of allotments will be achieved by availing the spectrum space for KRZB to upgrade its Archer City service from Channel 248 C2, to Channel 248 C1, as evidenced within the Texas Grace Technical Exhibit.

***Even as a C2 Service, KRZB Would be Unnecessarily Negatively Impacted by GGR's Request to Place Channel 249 C2 Service at Tipton; However, Any Such Conflict is Immediately Resolved by the Texas Grace Counterproposal***

25. The Engineering Exhibit provided by GGR's "unidentified" technical person (incorporated by reference) indicates that the request for utilization of Channel 249 C2 to facilitate Tipton service was made with accommodation concern for, among other facilities, those of KRZB's Channel 248 C2 service at Archer City.

26. While a .05 km separation from Archer City "reference coordinates" are ostensibly accommodated by GGR, it should be noted that such coordinates merely represent the U.S. Census Bureau's definition of Archer City's theoretical center of town. As such, it is understandably not necessarily feasible to place a tower/C2 transmission facility at such precise coordinates, as this would be potentially disruptive to the most urbanized center of the community, as well as to the quality of life of nearby residents and businesses.

27. In fact, KRZB had been ordered to specify an *actual* new facilities site by the Commission in conjunction with moving said facility from Olney to Archer City, Texas, under MM Docket #97-225, DA 98-2002, but found its intended facilities site short spaced by the GGR proposal at Tipton.

28. With its counterproposal assuring more efficient, direct allocation service to Tipton on Channel 275 C2, and upgrading KRZB service at Archer City on Channel 248 C1, Texas Grace concurrently resolves any difficulty it would have utilizing the most advantageous transmission site from which to allow KRZB to provide its vital broadcast service.

### ***Summary***

29. By way of summary of GGR's NPRM proposed Table of Allotment Amendment, and Texas Grace's Comments and Counterproposal, we have set forth below tables confirming the positions held:

<b>GGR's Proposal</b>	<b>Present</b>	<b>Proposed</b>
Eldorado, OK	246A	245A
Mangum, OK	249A	282A
Tipton, OK	-----	249 C2
<b>Texas Grace's Proposal<sup>3</sup></b>	<b>Present</b>	<b>Proposed</b>
Archer City, TX	248 C2	248 C1
Eldorado, OK	246A	246A
Granite, OK	-----	282 C3
Mangum, OK	249A	249A
Tipton, OK	-----	275 C2

### ***Conclusion***

30. Texas Grace's Counterproposal is a much preferable allocation of broadcast spectrum than that proposed by GGR. Texas Grace's plan eliminates the need for disruptively changing frequencies at Mangum, Oklahoma and Eldorado, Oklahoma, while still giving the community of Tipton, Oklahoma a well deserved service on a demonstrably more efficient frequency.

31. Furthermore, Texas Grace's plan will vastly improve service at Archer City, Texas and shall give the community of Granite, Oklahoma its first local service.

32. In total, an area encompassing 12,518.5 km containing a population of 76,270 persons would receive a new reception service as a result of the Class C1 upgrade at Archer City, and the Class C3 service at Granite.

33. Texas Grace's proposal will clearly result in a preferential arrangement of allocations consistent with Commission policy. Furthermore, Texas Grace's proposal promotes the Commission's goal of embracing diversity of thought and opinion in the broadcast media of adding and improving service reception to more rural and

---

<sup>3</sup> There will be absolutely no channel changes or substitutions required by the Texas Grace Proposal.

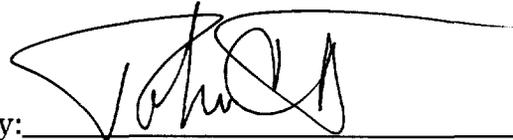
underserved areas, as well as Congress' charge to the Commission to ensure fair and efficient distribution of radio services.

**WHEREFORE**, the above premises considered, Texas Grace respectfully urges that the Commission ACCEPT its Comments and Counterproposal and AMEND Section 73.202(b) of the Rule, FM Table of Allotments, as follows:

<b>Texas Grace's Proposal</b>	<b>Present</b>	<b>Proposed</b>
Archer City, TX	248 C2	248 C1
Eldorado, OK	246A	246A
Granite, OK	-----	282 C3
Mangum, OK	249A	249A
Tipton, OK	-----	275 C2

Respectfully submitted,

**TEXAS GRACE COMMUNICATIONS**



By: \_\_\_\_\_

David M. Hunsaker  
John C. Trent  
Its Attorneys

March 15, 1999

*Law Offices*  
**PUTBRESE, HUNSAKER & TRENT, P.C.**  
100 Carpenter Drive, Suite 100  
P.O. Box 217  
Sterling VA 20167-0217

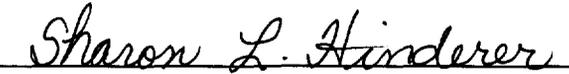
(703) 437-8400

## CERTIFICATE OF SERVICE

I, Sharon L. Hinderer, a secretary in the law firm of *Putbrese, Hunsaker and Trent, P.C.*, do hereby certify that I have, on March 15, 1999, sent by first class U.S. Mail, postage prepaid, the forgoing "***Comments and Counterproposal of Texas Grace Communications***" to the following:

Ms. Leslie K. Shapiro  
Allocations Branch  
Federal Communications Commission  
445 12th Street, S.W.  
12th Street Lobby, TW-A325  
Washington, D.C. 20554

Ellinor Nelson  
Good Government Radio  
P.O. Box 478  
Gonzalez, FL 32560

  
Sharon L. Hinderer



# WHEELER BROADCAST CONSULTING

## **Engineering Statement**

*Comments and Counterproposal  
RM 9423 - Tipton, OK*

This consultant has been retained by Texas Grace Communications for the purpose of preparing technical support to its comments and a counterproposal to the proposed Channel 249 C2 allocation sought by Good Government Radio (GGR) at Tipton, Oklahoma. The Tipton proposal (RM-9423, MM Docket 99-23) was adopted as a Notice of Proposed Rule Making on January 13, 1999 and was released January 22, 1999. The Comment date was set as March 15, 1999. The Texas Grace Comments are thus timely.

### **Good Government Radio's Proposal**

In its petition, GGR proposes a complicated scheme that would substitute channel 282 A for Channel 249 A for an operating radio station, KHIM in Mangum, Oklahoma. GGR further proposes to substitute Channel 245 A for Channel 246 A for the vacant allocation in Eldorado, Oklahoma. The result of this reordering would provide the community of Tipton, Oklahoma with a Channel 249 C2 service that is site restricted by 23.8 km.

### **Texas Grace Communications' Counterproposal**

Texas Grace Communications has determined that an alternate channel exists that can be allocated directly to Tipton, Oklahoma which would not require the disruptive changes in frequencies at Mangum and Eldorado. Channel 275 C2 can be allocated to Tipton, OK<sup>1</sup> with a less severe site restriction of only 18.8 km N.N.W.<sup>2</sup>

6075 MARLWAY  
SUITE 112  
MISSION, KS 66202  
913.362.7282  
913.362.7287

<sup>1</sup> The Coordinates of Tipton, Oklahoma are 34° 30' 05" N by 99° 08' 15" W.

<sup>2</sup> The proposed Channel 275 C2 allocation reference coordinates are 34° 38' 55" N by 99° 14' 21" W.

Exhibit 1 of this report is a search of the Commission's March 10, 1999 FM database which identifies Channel 275 as an alternate Class C2 channel at Tipton, OK<sup>3</sup>. In order to demonstrate compliance with the principal community signal requirements of 47 CFR 73.315, contours were predicted based on a model, Class C2 (50 kW at 150 m HAAT) reference facility at the proposed allocation reference site. A digitally generated map has been prepared which shows the 60 dBu and 70 dBu contours of such a facility and a copy of that map is included in this report as Exhibit 2. As shown in Exhibit 2, the entire corporate boundaries of Tipton, OK would be illuminated with a predicted signal well in excess of the prescribed 70 dBu minimum. Exhibit 2 further shows a large open area in which a suitable transmitter site could be selected.

#### KRZB - Archer City, TX

Texas Grace Communications is the permittee of KRZB in Archer City, TX<sup>4</sup>. Texas Grace Communications hereby proposes to upgrade the Channel 248 C2 allocation at Archer City to Channel 248 C1 at the same community. Archer City, TX is located at:

33° 35' 36" N  
98° 37' 31" W

Suitable allocation reference coordinates for the Channel 248 C1, Archer City, allocation were selected by choosing the point nearest to Archer City while meeting the minimum spacing requirements of 47 CFR 73.207 with respect to KLAQ in Durant, OK and KEAS-FM in Eastland, TX. Those allocation coordinates are:

33° 35' 38" N  
98° 51' 18" W

A study of the Commission's March 10, 1999 FM database, demonstrating the viability of Channel 248 C1 at Archer City, is included in this report as Exhibit 3. The site restriction associated with the proposed Class C1 operation is 21.23 km West.

---

<sup>3</sup> The allocation reference coordinates for Channel 275 C2 were selected by choosing the point nearest to the community of Tipton, OK while meeting the minimum spacing requirements of 47 CFR 73.207.

<sup>4</sup> KRZB was ordered from Olney, TX to Archer City, TX in the Report and Order in RM-9173, Docket 97-225.

Contours were predicted based on a model (100 kW at 299 m HAAT) Class C1 facility from the allocation reference point and plotted on a digitally generated map. A copy of that map is included in this report as Exhibit 4. As Shown in Exhibit 4, the city of Archer City would continue to receive a predicted signal well in excess of the 70 dBu minimum prescribed by 47 CFR 73.315. The proposed channel 248 C1, Archer City, operation would provide 60 dBu service to an area encompassing 16,419.7 km<sup>2</sup> and a population of 168,901 persons. This represents an increase of 92.45% in area when compared with the Class C2 allocation at Archer City and an increase of 25.95% in population served. An additional map exhibit, Exhibit 5, has been prepared which shows that the predicted 60 dBu contour of the proposed Channel 248 C1 reference facility would effectively encompass the predicted 60 dBu contour of the existing Channel 248 C2 allocation<sup>5</sup>. As such, there is effectively no loss in service that would be associated with the proposed upgrade.

#### Granite, Oklahoma

Texas Grace Communications, as a part of this counterproposal, further seeks to allocate Channel 282 C3 to Granite Oklahoma as that community's first local service. This Channel 282 C3 first service is mutually exclusive with the substitute Channel 282 A allocation proposed by GGR for KHIM at Mangum, OK.

Granite, Oklahoma is an incorporated community with a Mayor and City Council form of municipal government. The population of Granite is 1,844 persons according to the 1990 US Census. Granite provides its citizens with numerous services including water service, sewer service, gas service and electrical service. Education is provided to the citizens of Granite through the Granite City School District and the Granite City School. Granite City maintains a municipal Police Force and a municipal Fire Department. Economic development is handled by Jean Breeding at the Chamber of Commerce. For recreation, Granite maintains a municipal park and a municipal swimming pool. Granite is home to several civic organizations including the Lyons Club and the Women's ESA Club. Granite has a vibrant business community with numerous retail and service businesses. Granite, Oklahoma, however, has no local aural service.

---

<sup>5</sup> There is a *de minimis* loss area at the eastern extreme of the 60 dBu contour that encompasses 40.27 km. That 40.27 km represents 0.249% of the total 60 dBu service area of the proposed Channel 248 C1 operation.

The U.S. Census Bureau lists the coordinates of Granite, Oklahoma as:

34° 57' 47" N  
99° 22' 42" W

Suitable allocation reference coordinates for Channel 282 C3 at Granite were selected by choosing the point nearest to the City of Granite while meeting the minimum spacing requirements of 47 CFR 73.207 and are:

34° 57' 38" N  
99° 22' 00" W

The allocation coordinates thus represent a slight, 1.09 km, East site restriction. Exhibit 6 of this report is a search of the Commission's March 10, 1999 FM database that confirms that the proposed Channel 282 C3 allocation is compliant with the minimum spacing requirements of 47 CFR 73.207. The 60 dBu and 70 dBu contours of a model Class C3 (25 kW at 100m HAAT) radio station were predicted from the allocation reference site and were plotted on a digitally generated map. A copy of that map is included in this report as Exhibit 7. As shown in Exhibit 7, the entire community of Granite would receive a signal well in excess of the 70 dBu minimum prescribed by 47 CFR 73.315. The proposed 282 C3 operation in Granite, OK, in addition to providing the 1,844 persons in Granite with a first local service, would provide an additional aural service to an area encompassing 4,631.7 km<sup>2</sup> which contains a total population of 41,943 persons.

#### **Summary of Texas Grace Communications' Counterproposal**

The Texas Grace Communications counterproposal is clearly superior to the re-allotments proposed by Good Government Radio. The Texas Grace Communications plan spares the disruptive effects of changing the frequency of the licensed KHIM operation in Mangum, OK and the vacant allocation at Eldorado, OK while preserving the opportunity for a new service at Tipton, OK. In addition to the first local service at Tipton, the Texas Grace Communications plan would enhance service at Archer City, TX and provide for an entirely new first local service in Granite, OK. In total, an area encompassing 12,519.5 km<sup>2</sup> containing a population of 76,270 persons would receive new service as a result of the Class C1 upgrade at Archer City and the Class C3 Service at Granite. As such, Texas Grace Communications respectfully requests that the Commission amend the table of allotments, 47 CFR 73.202(b), as follows:

Community	Existing Allocation	Allocations Proposed in RM 9423	Allocations Proposed by Texas Grace Communications
Archer City, TX	248 C2	248 C2	248 C1
Eldorado, OK	248 A	245 A	248 A
Granite, OK	----	---	282 C3
Mangum, OK	249 A	282 A	249 A
Tipton, OK	----	249 C2	275 C2

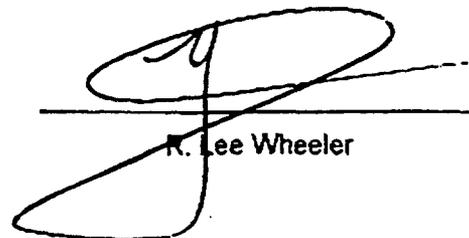
**Methodology**

All information for FM facilities was gleaned from the March 10, 1999 release of the Commission's FM database. All height above average terrain calculations were based on 8 cardinal radials as set forth in 47 CFR 73.313 and terrain data was extracted by a linear interpolation of the NGDC 30 second terrain database. Predicted service contours were plotted based on 380 evenly spaced radials for all FM facilities. All population determinations were based on a digital overlay of minor civil subdivision data as provided by the PL-94-171 census data files. The census files draw data from the 1990 US Census and rely on the block centroid retrieval methodology. Area determinations were measured by employing a K&E model 620000 Polar Planimeter or an arithmetic average of the 360 radials as was appropriate.

**Certification**

All information contained in this report is true and accurate to the best of my belief. Having had numerous matters before the Commission, my qualifications are a matter of record.

3/12/99  
Date

  
R. Lee Wheeler

WHEELER BROADCAST CONSULTING  
6025 Martway - Suite 112 - Mission KS 66202

Texas Grace Communications  
Tipton, OK Channel 275 C2

REFERENCE		DISPLAY DATES
34 38 55 N	CLASS C2	DATA 03-10-99
99 14 21 W	Current rules spacings	SEARCH 03-13-99
----- CHANNEL 275 -102.9 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KJYO LI CN	274C 35 32 52	Oklahoma City 97 29 29	OK 100.000 kW	57.3 160M	188.01 116.8	188.0 116.8	0.01 <
Clear Channel Radio Licenses, BLH880912KB							
KJYO LI DEN	274C 35 32 52	Oklahoma City 97 29 29	OK 100.000 kW	57.3 300M	188.01 116.8	188.0 116.8	0.01 <
Clear Channel Radio Licenses, BLH890303KC							
KVWCFM LI CN	272A 34 09 12	Vernon 99 16 09	TX 3.000 kW	182.9 43M	55.01 34.2	55.0 34.2	0.01 <
KVWC, Inc. BMLH870914KG							
KJYO.C CP CN	274C 35 35 52	Oklahoma City 97 29 22	OK 100.000 kW	55.9 372M	191.12 118.8	188.0 116.8	3.12
Clear Channel Radio Licenses, BPH980817IF 000310							
ALOPEN AL N	275C1 35 16 38	Amarillo 101 43 57	TX 0.000 kW	287.8 0M	238.16 148.0	224.0 139.2	14.16
>Site Restricted-Effective 3-20-89-Reserved for KRGN per D87-402							
KWFSFM LI CN	277C1 33 53 47	Wichita Falls 98 32 33	TX 100.000 kW	142.4 137M	105.25 65.4	79.0 49.1	26.25
American General Media-Texas, BLH6181							
AD278 AD	278C3 34 49 13	Wellington 100 14 29	TX 0.000 kW	282.1 0M	93.74 58.3	56.0 34.8	37.74
Hunt Broadcasting, Inc. 970519							
>Counterproposal-Petition for Recon filed 3-6-98							
ALOPEN AL N	278C3 34 49 13	Wellington 100 14 29	TX 0.000 kW	282.1 0M	93.74 58.3	56.0 34.8	37.74
97-104							
>A Filing Window for this Channel will be Opened by the Commission i							
>Subsequent Order.							
>Site Restriction 4.5km Southwest-Effective 4-13-98 per D97-104-Peti							
>Recon 3-6-98							
KQXC	273A	Wichita Falls	TX	141.7	99.80	55.0	44.80



WHEELER BROADCAST CONSULTING  
6025 Martway - Suite 112 - Mission KS 66202

Texas Grace Communications  
Archer City, TX Ch. 248 C1

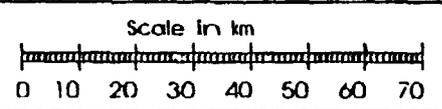
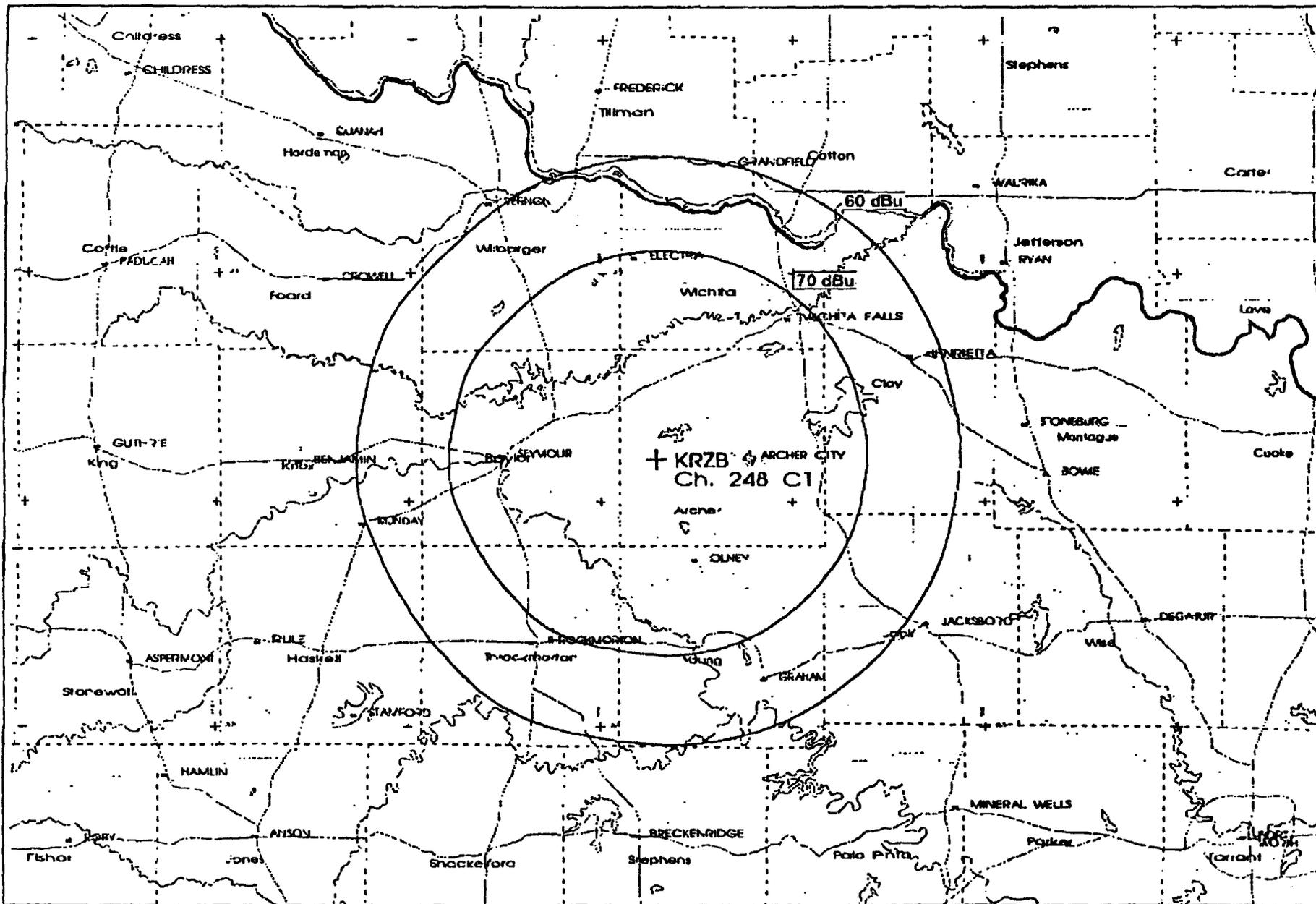
REFERENCE							DISPLAY DATES
33 35 38 N				CLASS C1			DATA 03-10-99
98 51 18 W				Current rules spacings			SEARCH 03-13-99
----- CHANNEL 248 - 97.5 MHz -----							

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
ALOPEN AL	248C2 N 33 35 36	Archer City 98 37 31	TX 0.000 kW	90.1 OM	21.32 13.3	224.0 139.2	-202.68 *
		97-225					>Effective 11-17-98-Reserved for KRZB, per D97-225
KRZB.C CP	248C2 CN 33 22 08	Olney 98 44 11	TX 50.000 kW	156.2 88M	27.28 17.0	224.0 139.2	-196.72 *
		Texas Grace Communications				BPH960201MB	981126
							>*To Channel 248C2, Archer City, TX, per D97-225
AD249 AD	249C2 34 34 53	Tipton 99 22 55	OK 0.000 kW	336.3 OM	119.85 74.5	158.0 98.2	-38.15 *
		Good Government Radio				RM9423	981120
							>site 23.8 km west
KLAK LI	248C2 CN 33 41 31	Durant 96 26 36	OK 27.000 kW	86.5 205M	224.00 139.2	224.0 139.2	0.00 *
		Lake Broadcasting, Inc.				BLH980508KE	
KEASFM LI	249A CN 32 23 47	Eastland 98 46 26	TX 3.000 kW	176.7 62M	133.02 82.7	133.0 82.7	0.02 <
		WDS Broadcasting Co.				BLH870130KB	
KEASFM AP	249A CN 32 23 47	Eastland 98 46 26	TX 3.000 kW	176.7 62M	133.02 82.7	133.0 82.7	0.02 <
		WDS Broadcasting Co.				BPH980713IC	
							>INCOMPLETE DATA IN APPLICATION--SOME DATA IN THIS RECORD IS CARRIED >FROM CURRENT LICENSE (ESPECIALLY ERP).
AD249 AD	249C3 34 17 28	Healdton 97 29 23	OK 0.000 kW	58.0 OM	148.03 92.0	144.0 89.5	4.03
		Wright & Wright, Inc.				RM9264	980413
							>Site Restriction 6.6km North
KWTXFM CP	248C CN 31 20 15	Waco 97 18 37	TX 100.000 kW	149.6 451M	289.31 179.8	270.0 167.8	19.31
		GulfStar Communications Waco				BPH970801IG	990503
KWTXFM AP	248C CN 31 20 15	Waco 97 18 37	TX 100.000 kW	149.6 430M	289.31 179.8	270.0 167.8	19.31

WHEELER BROADCAST CONSULTING  
6025 Martway - Suite 112 - Mission KS 66202

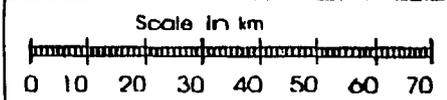
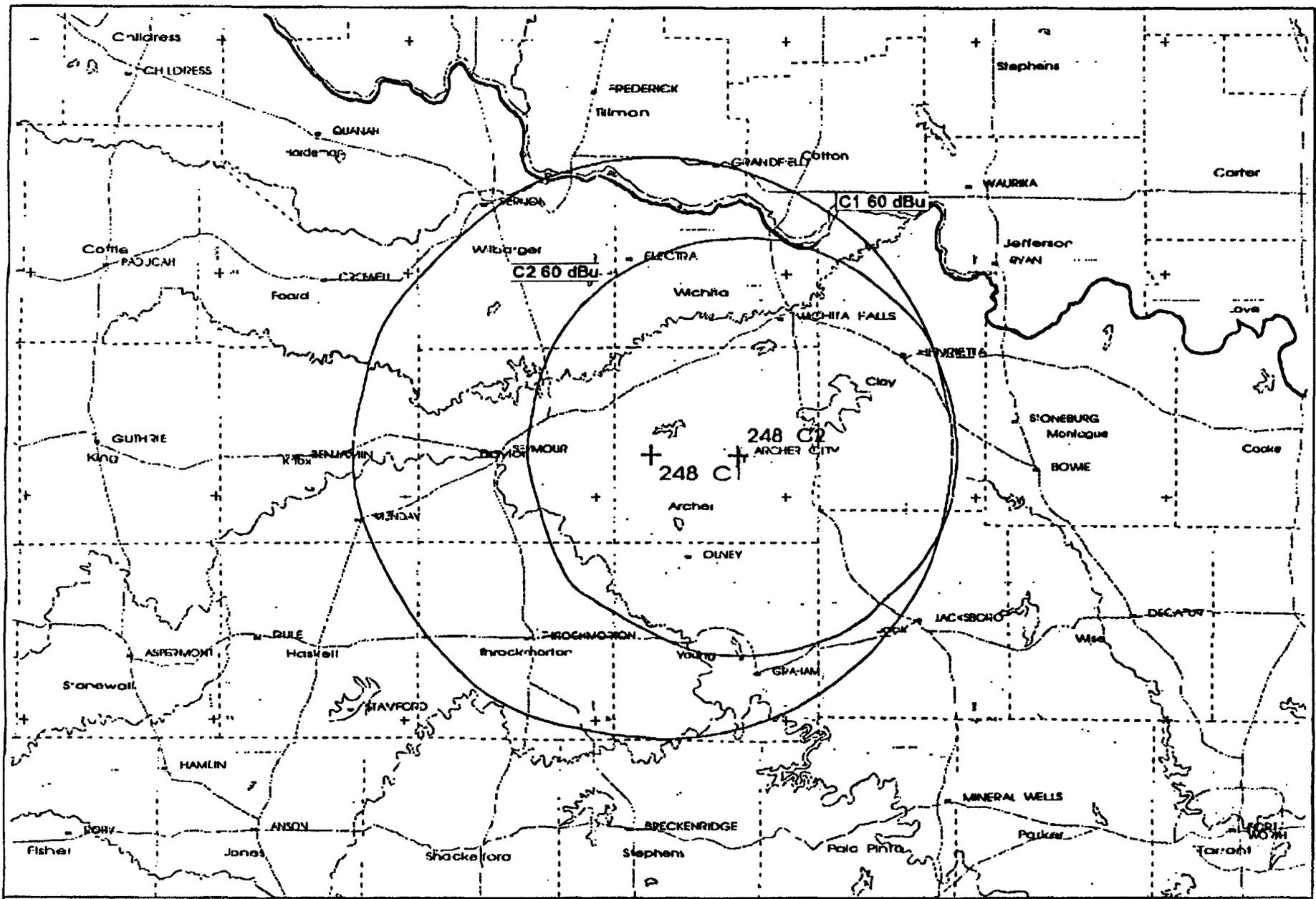
CLASS C1

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
GulfStar Communications Waco					BMPH981125IC		
KWTXFM	248C	Waco	TX	149.8	290.53	270.0	20.53
LI CY	31 19 19	97 18 58	100.000 kW	478M	180.6	167.8	
Gulfstar Communications Waco					BMLH881209KA		
KHIM	249A	Mangum	OK	337.5	153.98	133.0	20.98
LI CN	34 52 27	99 30 04	1.500 kW	50M	95.7	82.7	
Altus Educational Broadcastin					BLED980720KD		
>Commercial Channel Operating Educational							
DE249	249A	Mangum	OK	337.5	153.98	133.0	20.98
DE	34 52 27	99 30 04	0.000 kW	OM	95.7	82.7	
Good Government Radio					RM9423		981120
KGKLFM	248C1	San Angelo	TX	212.5	274.88	245.0	29.88
LI CN	31 29 46	100 24 50	100.000 kW	125M	170.8	152.3	
KGKL, Inc.					BLH851101KD		
KJMZ	251C1	Lawton	OK	22.5	119.90	82.0	37.90
LI HN	34 35 27	98 21 10	100.000 kW	61M	74.5	51.0	
Sovereign Broadcasting, Inc.					BLH4928		
>Horizontally polarized only							
KWEYFM	247C1	Weatherford	OK	2.9	217.34	177.0	40.34
LI CN	35 33 02	98 43 59	69.000 kW	122M	135.1	110.0	
Wright Broadcasting Systems,					BLH7488		
DE246	246A	Eldorado	OK	323.4	122.00	75.0	47.00
DE	34 28 24	99 38 54	0.000 kW	OM	75.8	46.6	
Good Government Radio					RM9423		981120
ALOPEN	246A	Eldorado	OK	323.4	122.00	75.0	47.00
AL N	34 28 24	99 38 54	0.000 kW	OM	75.8	46.6	
90-14							
>First Come/First Served Allotment							
>Effective 12-31-90							
KGOKFM	249C3	Pauls Valley	OK	49.4	191.63	144.0	47.63
LI CN	34 42 14	97 15 46	16.000 kW	125M	119.1	89.5	
Wright and Wright, Inc.					BLH960502KC		
>From Channel 249A per D93-247							
DE249	249C3	Pauls Valley	OK	49.4	191.63	144.0	47.63
DE	34 42 14	97 15 46	0.000 kW	OM	119.1	89.5	
Wright & Wright, Inc.					RM9264		980413



Proposed Channel 248 C1 - Archer City, TX  
 N. Lat. 33 35 38    W. Lng. 98 51 18

EXHIBIT 4  
 L. WHEELER - 03/99



Comparative Service Ch. 248 C1 and Ch. 248 C2  
 N. Lat. 33 35 38 W. Lng. 98 51 18

EXHIBIT 5  
 L. WHEELER - 03/99

WHEELER BROADCAST CONSULTING  
6025 Martway - Suite 112 - Mission KS 66202

Texas Grace Communications  
Granite, OK Channel 282 C3

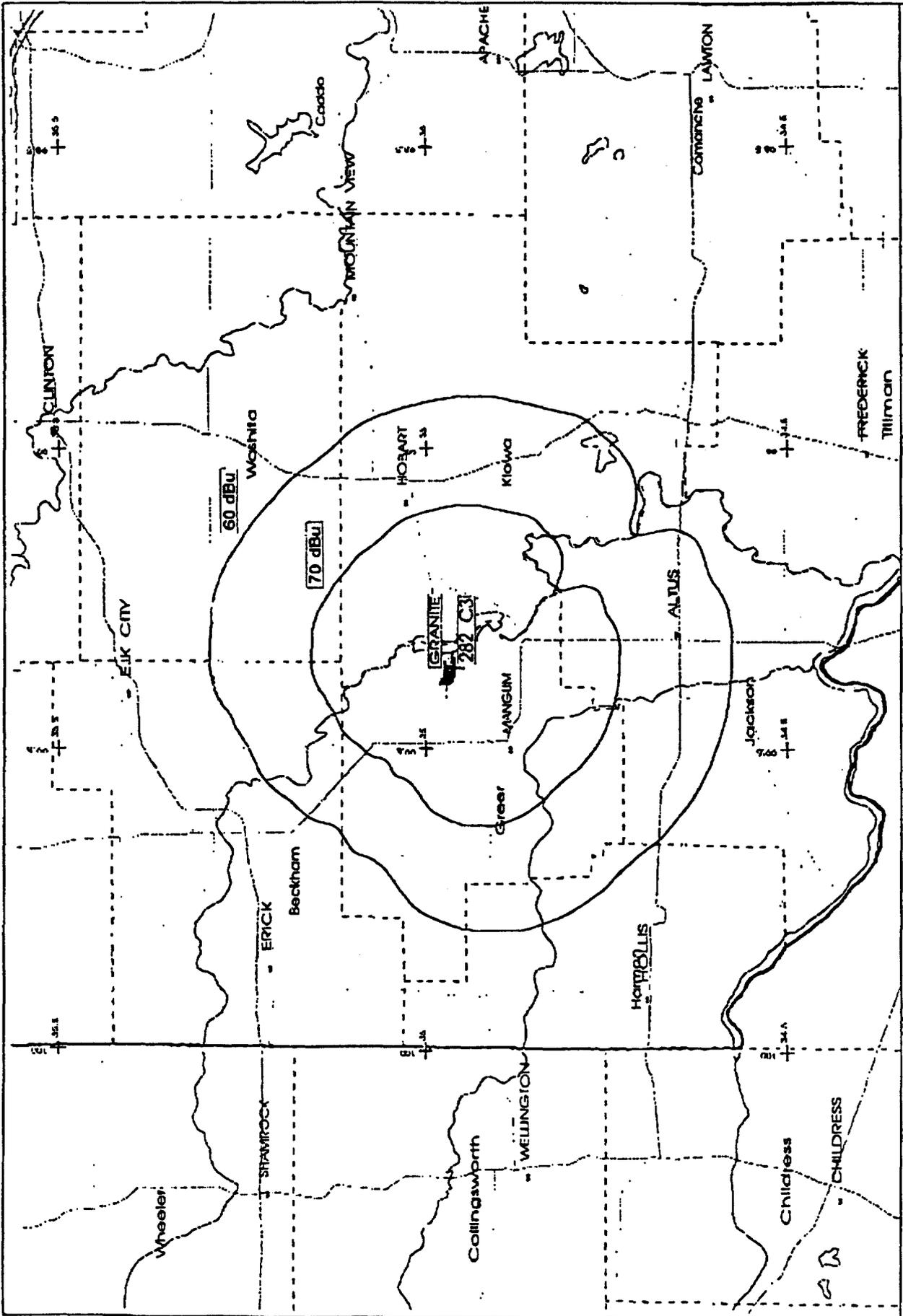
REFERENCE 34 57 38 N CLASS C3 DISPLAY DATES  
99 22 00 W Current rules spacings DATA 03-10-99  
CHANNEL 282 -104.3 MHz SEARCH 03-13-99

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD282 AD	282A 34 52 27	Mangum 99 30 04	OK 0.000 kW	232.0 OM	15.58 9.7	142.0 88.3	-126.42 *
		Good Government Radio			RM9423		981120
KQFX LI CN	282C1 35 25 34	Borger 101 36 47	TX 100.000 kW	284.9 175M	211.01 131.1	211.0 131.1	0.01 <
		Galbreath Broadcasting, Inc.			BLH920521KA		
KMGL LI CY	281C 35 32 58	Oklahoma City 97 29 18	OK 100.000 kW	68.5 415M	183.00 113.7	176.0 109.4	7.00
		Renda Broadcasting Corp. of N			BLH820830AH		
KYYI LI CN	284C 34 05 35	Burkburnett 98 52 44	TX 100.000 kW	155.0 310M	106.14 66.0	96.0 59.7	10.14
		Sam F. & Pamela S. Beard			BLH881118KA		
>*To channel 284C1							
AD283 AD	283C1 36 21 24	Mooreland 99 13 37	OK 0.000 kW	4.6 OM	155.41 96.6	144.0 89.5	11.41
		Ralph Tyler			RM9133		970827
>Site Restriction 9.3km South-Alternate Channel							
KRPTFM LI CN	279C1 34 56 30	Anadarko 98 22 34	OK 75.000 kW	91.0 85M	90.51 56.3	76.0 47.2	14.51
		Monroe-Stephens Broadcasting,			BLH811007AI		
ALOPEN AL N	282C2 33 08 47	Olney 98 52 00	TX 0.000 kW	167.0 OM	206.46 128.3	177.0 110.0	29.46
		97-225					
>A filing window for this channel will be opened by the Commission i							
>subsequent order.							
>Effective 11-17-98 per D97-225							
KYYI.C CP CN	284C1 34 05 35	Burkburnett 98 52 44	TX 92.000 kW	155.0 310M	106.14 66.0	76.0 47.2	30.14
		Cumulus Licensing Corp.			BPH980115IC		990729
>From Channel 284C							
ALOPEN AL N	229A 35 17 24	Cordell 98 59 24	OK 0.000 kW	43.0 OM	50.15 31.2	12.0 7.5	38.15

WHEELER BROADCAST CONSULTING  
6025 Martway - Suite 112 - Mission KS 66202

## CLASS C3

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
84-231			WO= 880413				880519
>First Come/First Served Allotment							
># 63							
KYYI	284C	Burkburnett	TX	146.9	134.73	96.0	38.73
LI CN	33 56 30	98 34 07	0.740 kW	87M	83.7	59.7	
Sam F. & Pamela S. Beard					BLH941220KD		
>*To channel 284C1							
KRKZ	228C2	Altus	OK	192.1	59.19	17.0	42.19
LI CN	34 26 20	99 30 08	45.000 kW	161M	36.8	10.6	
Altus Radio, Inc.					BLH890227KG		



Scale in miles  
 0 10 20 30 40

Proposed Ch. 282 C3 Granite, Oklahoma  
 N. Lat. 34 57 38 W. Long. 99 22 30

EXHIBIT 7  
 L. WHEELER - 03/99