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April 1, 1999

FEDERAL EXPRESS #809881651399

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S. W.
Washington, DC 20024

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APR - 2 1999

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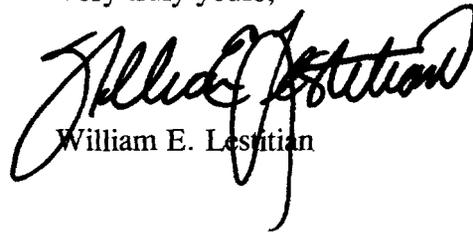
**RE: CLARION COUNTY BROADCASTING, INC.
LICENSEE OF FM BROADCAST STATION WCCR AND
AM BROADCAST STATION WWCH**

Dear Ms. Salas:

Transmitted herewith for filing on behalf of Clarion County Broadcasting, Inc., are an original and four copies of a Counterproposal in opposition to the Notice of Proposed Rulemaking issued pursuant to a petition filed on December 22, 1998, by West Wind Broadcasting.

If any additional information is necessary or desired, please communicate directly with the undersigned at the address shown above.

Very truly yours,


William E. Lestitian

FAP/lmw

Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

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In the Matter of	}	
	}	
Amendment of Section 73.202(b),	}	MM Docket No. 99-58
Table of Allotments,	}	RM-9461
FM Broadcast Stations,	}	
(Strattanville, Pennsylvania)	}	

To: Chief, Allocations Branch

COUNTERPROPOSAL

AND NOW, comes Clarion County Broadcasting, Inc., licensee of Stations WCCR-FM and WWCH-AM, Clarion, Pennsylvania (hereinafter "Clarion"), through counsel, and herein proffers this Counterproposal in opposition to the Notice of Proposed Rulemaking issued pursuant to a petition filed on December 22, 1998, by West Wind Broadcasting (hereinafter "West Wind") proposing the allotment of Channel 267A at Strattanville, Pennsylvania.

Clarion hereby represents that in the event Channel 267A is assigned to Township, Pennsylvania (hereinafter "Township"), it will file or cause to be filed an application for authority to construct and operate an FM broadcast station on that assigned frequency. In support thereof, the following is shown:

I. Geographic Information

The Township is situated in northern Clarion County, Pennsylvania. Clarion County is located in the western part of the state, just north of the midway point between the northern and southern borders of the Pennsylvania. The total area of the county is approximately 597 square miles. The Township is located approximately 70 miles northeast of Pittsburgh, Pennsylvania and approximately 3 miles southeast of the Borough of Clarion, the county seat of Clarion County. The Township is near the intersection of State Routes 66 and 36 and is approximately 5 miles east of the intersection of Interstates 79 and 80. The Township is situated in close proximity to Cook Forest State Park and the Clarion River.

II. Population and Demographics

According to the 1990 Census, the total population for the Township is 1,927 persons. The population of Clarion County increased by 0.3% between 1990 and 1997.

Over sixty-five (65%) percent of the households are made up of "family households". Seventy two (72%) percent of persons 25 years of age and older are high school graduates and over eleven (11%) percent of this same group are also college graduates.

Seventeen (17%) percent of employed persons age 16 and over are in the managerial field, while a combined fifty-five (55%) percent of persons age 16 and over are in the sales and labor industries.

III. History

The Township was founded in 1806. By 1808, the population of the Township rose to 2,185. The majority of the early settlers were Irish and German. Taking full advantage of the

upland forests in close proximity to the Township, these early settlers turned to timber and farming as their major industries. It became common to use the rivers flowing downstream to Pittsburgh as a means of transporting timber to market.

IV. Government

The Township is an incorporated township within the Commonwealth of Pennsylvania. The governing body is comprised of an elected board of three (3) supervisors. They are elected for overlapping terms of six (6) years. Elections are held every two (2) years.

V. Public Safety

Fire protection is provided to the citizens of the Township by the Farmington Volunteer Fire Company. The fire department consists of several fully equipped fire fighting units including first aid and resuscitation capabilities, as well as high power pumpers, ladder trucks, water tanks and a full arsenal of necessary supplies.

VI. Religious Institutions

There are numerous religious institutions located in the Township, serving the needs of the residents including: (1) St. Mary's Church; (2) Good Shepherd United Methodist Church; and (3) Pilgrim Holiness Church. The churches have united their resources to provide a food bank for the citizens of the Township. The Pilgrim Holiness Church organizes summer camps for the local youth.

VII. Recreational Facilities

The Township is adjacent to the Cook Forest State Park which provides residents with over fifty (50) miles of fishing and boating and over 6,500 acres of hiking, camping, swimming, cross country skiing and horseback riding. Cook Forest is the largest stand of virgin white pines east of the Mississippi River. The State Park also features an expansive nature trail where hikers can interact with the local wildlife and is a site for over 800,000 visitors each year, in all seasons. Together, these resources offer activities for all ages and lifestyles.

VIII. Civic/Fraternal/Charitable Groups and Organizations

The citizens of the Township are actively involved in civic, fraternal and charitable groups and organizations. Such organizations include the Farmington Volunteer Fire Company Auxiliary and Boy/Girl Scout troops.

IX. Engineering Showing

Attached hereto is the engineering statement and affidavit of Ann Gallagher, an experienced and recognized communications engineer in support of Clarion's petition to assign Channel 267A to Farmington Township, Pennsylvania. Ms. Gallagher establishes that the allotment can be made in full compliance with the Commission's Rules.

X. Need for a FM Station in Township, Pennsylvania

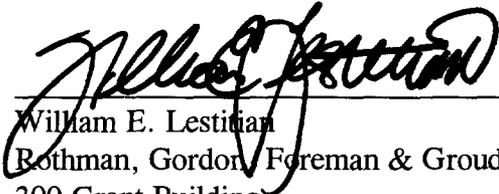
There is no local commercial FM station licensed to the Township. The only other radio stations licensed in the immediate area are: (1) a daytime only AM radio station, WWCH, licensed to Clarion; (2) WCUC FM, a non-commercial educational station, licensed to Clarion State College in Clarion; (3) WCCR FM, a licensed full service FM Station in Clarion; (4) WMKX FM, a licensed full service FM Station licensed to Brookville and (5) WBEU FM, a licensed full service FM Station licensed to Brookville.

There is a manifest need to bring a first commercial FM service to the Township. The existing FM service in the surrounding areas tends to service the needs and interests of the college students and faculty of nearby Clarion State University. The format and advertisers of these stations are not consistent with the wants and needs of the surrounding rural communities. Clarion County Broadcasting, Inc. hopes to bring the first, regular, full-time FM local service to Farmington Township, Pennsylvania. A FM Station operating on Channel 267A at Farmington Township, Pennsylvania will meet this need and thereby serve the public interest.

Wherefore, on the basis of the foregoing, Clarion County Broadcasting, Inc. respectfully requests the Commission to assign FM Channel 267A to Farmington Township, Pennsylvania.

Respectfully submitted,
Clarion County Broadcasting, Inc.

By: 
Frederick A. Polner
Rothman, Gordon, Foreman & Groudine, P.C.
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Pittsburgh, Pennsylvania 15219
(412) 338-1111

By: 
William E. Lestitian
Rothman, Gordon, Foreman & Groudine, P.C.
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Pittsburgh, Pennsylvania 15219
(412) 338-1111

Attorneys for Clarion County Broadcasting, Inc.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing **Counterproposal** was mailed, via federal express, this 1st day of April, 1999, to the following:

Victor A. Michael, Jr., President
West Wind Broadcasting
6807 Foxglove Drive
Cheyenne, Wyoming 82009



Steve A. Walton

ENGINEERING STATEMENT
IN SUPPORT OF COMMENTS
MM DOCKET NO. 99-58, RM-9461
STRATTANVILLE, PENNSYLVANIA

WEST WIND

This firm has been retained by Clarion County Broadcasting, Inc. to prepare engineering in support of a counterproposal in RM-9461. In this proceeding, ~~Waga~~ *WEST WIND* Broadcasting requested that channel 267A be allotted to Strattanville, Pennsylvania. Clarion County proposes instead that Section 73.202(b) of the Commission's rules be amended as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Farmington Township, Pennsylvania	-----	267A

The following reference point has been designated for Farmington Township:

41° 21' 46" N.
79° 17' 52" W.

The point is 1.0 kilometer southeast of the town of Leeper¹, in central Farmington Township. The site restriction is necessary to provide the required minimum separation to CKOT, channel 267B, Tillsonburg, Ontario. The reference point is within 16 kilometers of Farmington Township, so that a class A facility could be located so as to provide the required principal community service.

The attached table shows that channel 267A meets all separation requirements at the designated reference point.

Allotment of channel 267A to Farmington Township would comply with all applicable FCC rules. The addition of this channel would provide a first local service to this community.


Ann Gallagher

¹ The U.S.G.S. lists the following reference point for Leeper, Pennsylvania: 41° 22' 12" N; 79° 18' 16" W.

FM ALLOCATION SEPARATION REPORT

Run by : AG
 CallSign : PRM
 City : Farmington Twp, PA
 Coordinates: 41 21 46.0 N
 : 79 17 52.0 W

Date : 3/30/99
 Channel : 267
 Frequency : 101.3 MHz
 Class : A

CallSign	Stat	Licensee	Chan	ERP-kw	Latitude	Bear	Notes
File-Number	City		Freq	HAAT-m	Longitude	Dist-km	Req-km Short-km
WMXO	LIC	Erin Communications, In	268A	1.45	42 6 24.0N	42.0	CLEAR
BMLH-940513KA		Olean, NY	101.5	119	78 23 28.0W	111.88	72.00
WZPT	CP	EZ Pittsburgh, Inc.	264B	12.00	40 29 43.0N	211.9	CLEAR
BPH-970618IA		New Kensington, PA	100.7	301	80 0 18.0W	113.27	69.00
WZPT	LIC	EZ Pittsburgh, Inc.	264B	17.00	40 29 43.0N	211.9	CLEAR
BLH-900807KA		New Kensington, PA	100.7	260	80 0 18.0W	113.27	69.00
WRKT	LIC	Rambaldo Communications	265B1	4.20	42 11 51.0N	338.0	CLEAR
BLH-950828KA		North East, PA	100.9	243	79 45 10.0W	100.13	48.00
WHUG	LIC	The Derrick Publishing	270A	6.00	42 7 53.0N	4.3	CLEAR
BLH-970613KD		Jamestown, NY	101.9	100	79 13 13.0W	85.61	31.00
WGMR	LIC	Allegheny Mountain Netw	266B	8.50	40 55 10.0N	113.5	CLOSE
BMLH-890316KC		Tyrone, PA	101.1	352	77 58 28.0W	121.52	113.00
17894	894		266B	0.00	42 53 52.0N	9.2	CLOSE
-		Fort Erie, ON	101.1	-176	78 57 27.0W	172.80	149.00
17946	946		266B	50.00	42 54 0.0N	9.3	CLOSE
-		Fort Erie, ON	101.1	79	78 57 9.0W	173.12	149.00
WHOTFM	LIC	Connoisseur Communicati	266B	24.50	41 3 26.0N	253.6	CLOSE
BLH-971006KD		Youngstown, OH	101.1	216	80 38 22.0W	117.53	113.00
WHOTFM	LIC	WHOT, Inc.	266B	25.00	41 5 26.0N	255.1	CLOSE
BLH-860128KB		Youngstown, OH	101.1	37	80 36 56.0W	114.56	113.00
CKOTFM	159		267B	50.00	43 0 44.0N	325.9	SHORT
-		Tillsonburg, ON	101.3	-288	80 50 10.0W	222.97	223.00 0.03
WORDFM	LIC	Kiss Limited Partnershi	268B	48.00	40 29 2.0N	211.1	CLOSE
BMLH-920420KD		Pittsburgh, PA	101.5	162	79 59 34.0W	113.81	113.00