

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

COUNTERPROPOSAL
LEGEND COMMUNICATIONS, INC.
KTMO RADIO STATION
KENNETT, MISSOURI
June 1999

TECHNICAL EXHIBIT

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COUNTERPROPOSAL
LEGEND COMMUNICATIONS, INC.
KTMO RADIO STATION
KENNETT, MISSOURI
June 1999

1. This technical statement and attached exhibits were prepared on behalf of Legend Communications, Inc. ("Legend"), licensee of KTMO, Channel 255C, Kennett, Missouri. These comments are being submitted in MM Docket # 99-140 in which Legend, the petitioner, requested that the community of license for KTMO be changed from Kennett, Missouri, to Keiser, Arkansas. These comments propose that, in lieu of the change in community of license to Keiser, Arkansas, KTMO's community of license be changed from Kennett, Missouri, to Munford, Tennessee, and that Channel 255C be allotted to Munford, Tennessee, as that community's first local service.

2. Munford, Tennessee, is located in northwest Tipton County, Tennessee. Based on the 1990 Census, Munford has a population of 2,326. Presently, there is no AM or FM service licensed to Munford. The allotment of Channel 255C would provide first locally licensable service to the community of Munford.

3. Legend, therefore, requests that Channel 255C be allotted to Munford, Tennessee, as that community's first local FM licensable service at geographic coordinates North Latitude 35° 46' 53" and West Longitude 89° 36' 46". This reflects a site restriction of 41.7 kilometers north of the community to avoid shortspacing station WYMX, Channel 256C, Greenwood, Mississippi.¹

1) From this proposed location, Channel 255C is shortspaced to the proposed allotment of Channel 254A at North Tunica, Mississippi, as proposed in MM Docket #99-146. The comment period in that docket closes on June 28, 1999. This proposal will be resubmitted in that docket by the deadline for comments.

From this location, a maximum Class C facility will deliver a 3.16 mV/m contour over the community of Munford. Attached as Exhibit #1 is a usable area map depicting the usable area for Channel 255C at Munford, Tennessee.² Attached as Exhibit #2 is a §73.207 spacing analysis showing that Channel 255C at Munford meets the Commission's minimum distance separation requirements to all licensed and applied for facilities.³

4. The relocation of KTMO from its presently licensed site to the herein requested reference coordinates for Channel 255C results in a withdrawal of the 60 dBu contour to a portion of an area presently services by the licensed KTMO 60 dBu. An evaluation has been conducted to determine the number of other services within the 60 dBu loss area of KTMO. Attached as Exhibit #3 is a map depicting the area that will no longer receive service from KTMO as a result of the change in community of license. As shown on the map, there are numerous FM commercial and non-commercial licensed facilities delivering service to portions of the loss area. There are at minimum five other FM services remaining in the area, after the withdrawal of the KTMO 60 dBu. A tabulation of the FM stations providing 60 dBu service to this area is attached as Exhibit #4. Therefore, the withdrawal of the KTMO 60 dBu contour from this area will not result in the creation of any white area or gray area.⁴ In fact, the area is serviced by more than five services, therefore, this area will remain well served. Further, there will also be areas that will receive first time service from a relocated KTMO. These areas likewise have numerous services.

2) The map does not consider the Channel 254A proposal at North Tunica, Mississippi.

3) With the exception of Channel 254A at North Tunica, Mississippi.

4) Gray area is defined as areas in which there are at least two services.

The relocation of KTMO will not provide white or gray area service as a result of the relocation.⁵ Exhibit #5 is a map showing the number of licensed FM commercial and non-commercial 60 dBu contours are in the gain area. A tabulation of the stations is shown on Exhibit #6.

6. Munford, Tennessee, (in Tipton County) is located in a county adjoining Shelby County in which Memphis is located. As shown on Exhibit #7, the 70 dBu contour of the relocated KTMO will not encompass 50% or more of the Memphis Urbanized Area. In fact, coverage from the KTMO facility, based on a maximum Class C from the herein proposed referenced site, will only be provided service from 6.25% of the 70 dBu contour over the Memphis Urbanized Area. As such, an evaluation pursuant to the Faye and Richard Tuck criteria was not undertaken.⁶

7. Therefore, Legend proposes the following changes in the Commission's Table of FM Allotments, §73.202b of the rules:

Munford, Tennessee

Present
None

Proposed
255C

Kennett, Missouri

Present
255C, 282A

Proposed
282A⁷

5) See Footnote 6 supra.

6) 3 FCC Rod 5374

7) In addition, non-commercial FM station KAUF on Channel 210A, as well as AM stations KOTC on 830 kHz and KBOA on 1540 kHz, will remain licensed to Kennett, Missouri.

PUBLIC INTEREST ASPECTS

8. The re-allotment of Channel 255C from Kennett, Missouri, to Munford, Tennessee, will provide first locally licensable FM service to the community of Munford, Tennessee, without depriving Kennett, Missouri, of its only facility, since stations KXOQ, KAUF, KOTC and KBOA will remain licensed to Kennett, Missouri. In addition, a maximum Class C facility operating at Munford, Tennessee, will provide 60 dBu coverage to 1,343,557 persons in 26,483.5 square kilometers.⁸ This represents an increase in 1,139,398 persons and 15,741.4 square kilometers over the currently authorized facility.^{9 10}

9. This counterproposal is mutually exclusive with the request contained in MM Docket #99-146 and the Munford, Tennessee, allotment of Channel 255C is mutually exclusive with the existing KTMO facility in Kennett, Missouri, as well as to the previously requested Keiser proposal. This proposed re-allotment is from one rural community to a second rural community (Kennett, Missouri, to Munford, Tennessee) and, as indicated above, it will not deprive Kennett of its only locally licensed services.

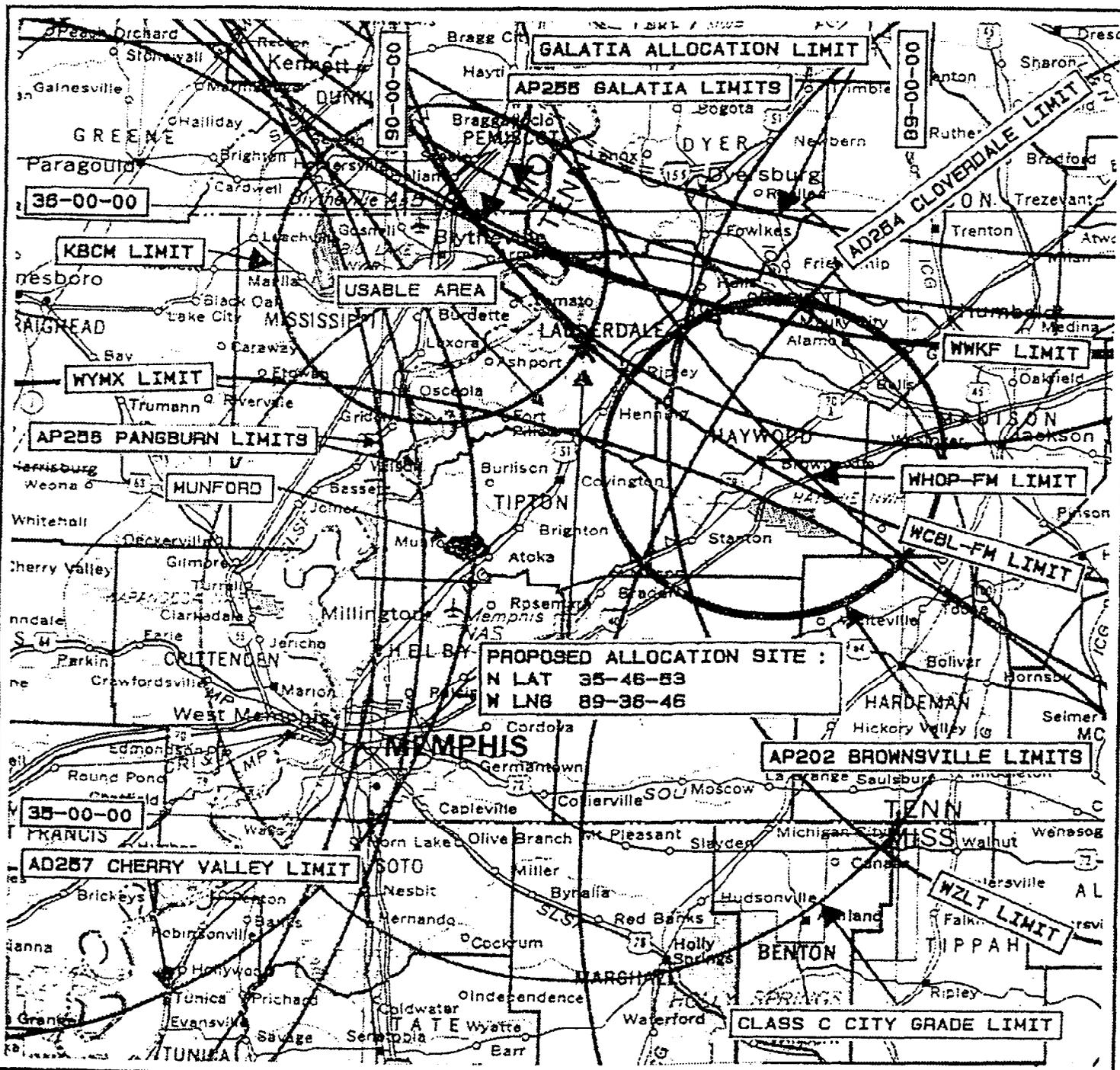
10. The foregoing comments were prepared on behalf of Legend Communications by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to FM facilities and allotments

8) As presently authorized, KTMO provides 60 dBu service to 320,028 persons in 16,506.9 square kilometers.

9) Less the amount of persons that would lose service from KTMO as a result of the relocation (115,869 persons reside in the theoretical loss area. Population and area calculations based on 36 equally spaced radii).

10) It is further noted that the originally proposed change in community to Keiser would have only served an additional 173,599 persons in 9,912.0 square kilometers over the licensed KTMO facility.

was extracted from the NTIA database as updated on June 10, 1999. We assume no liability for errors or emissions in that database, which may be adverse to the request contained herein. All population data was extracted from the PL 94-171 computer files. All terrain calculations were based on the use of a three second arc database.



MAP IS A PHOTO ENLARGED PORTION OF THE 1: 2, 000, 000 SCALE U.S.G.S. NATIONAL ATLAS MAP.

MAP DOES NOT CONSIDER THE PROPOSED NORTH TUNICA, MS PROPOSAL ON CHANNEL 254A.

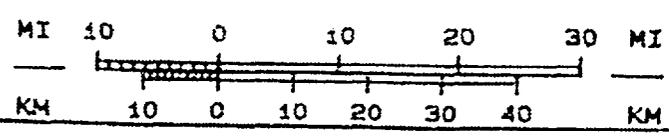


EXHIBIT #1

COMMENTS & COUNTERPROPOSAL
 LEGEND COMM., INC.
 MM DOCKET #99-140
 MUNFORD, TENNESSEE

June 1999

GRAHAM BROCK, INC.
 BROADCAST TECHNICAL CONSULTANTS

**COUNTERPROPOSAL
LEGEND COMMUNICATIONS, INC.
KTMO RADIO STATION
KENNETT, MISSOURI
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EXHIBIT #2

ALLOCATION STUDY FOR Munford, TENNESSEE
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE		DISPLAY DATES
35 46 53 N	CLASS C	DATA 06-18-99
89 36 46 W	Current rules spacings	SEARCH 06-18-99
----- CHANNEL 255 - 98.9 MHZ -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD255	255C	Munford	TN	0.0	0.0	290.0	-290.00
AD	35 46 53 89 36 46		0.000 kW	OM	0.0	180.2	
Legend Broadcasting, Inc.							
KTMO	255C	Kennett	MO	306.9	65.16	290.0	-224.84
LI CN	36 07 53 90 11 34		100.000 kW	303M	40.5	180.2	
Legend Broadcasting, Inc. BLH-890504KB							
* AD254	254A	North Tunica	MS	212.3	146.51	165.0	-18.49
AD	34 39 50 90 28 13		0.000 kW	OM	91.1	102.6	
Fred R. Flinn RM-9490							
KBCM.A	202A	Blytheville	AR	300.2	29.05	29.0	0.05
AP CN	35 54 45 89 53 29		0.500 kW	58M	18.0	18.0	
American Family Association BMPED-990326MA							
>From channel 201 A							
KBCM.C	201A	Blytheville	AR	300.2	29.05	29.0	0.05
CP CN	35 54 45 89 53 28		0.225 kW	58M	18.0	18.0	
American Family Association BPED-961205MB							
WCBLFM	256A	Benton	KY	43.3	165.55	165.0	0.55
LI CN	36 51 30 88 20 13		3.300 kW	91M	102.9	102.6	
The Purchase Broadcasting Co. BMLH960213KA							
WCBLFM	256A	Benton	KY	43.3	165.61	165.0	0.61
CP CN	36 51 31 88 20 11		3.300 kW	91M	102.9	102.6	
Jim W. Freeland BPH990128IK							
WWKF	257A	Fulton	KY	38.0	96.83	95.0	1.83
LI CN	36 27 59 88 56 47		3.000 kW	91M	60.2	59.0	
Wenk-FM of Union City, Inc. BLH821222AO							
AP202	202A	Brownsville	TN	121.3	38.65	29.0	9.65
AP CN	35 36 01 89 14 53		0.100 kW	20M	24.0	18.0	
Haywood County Board of Educ. BPED-970603MB							
AP202	202A	Brownsville	TN	122.4	39.17	29.0	10.17
AP DCN	35 35 33 89 14 50		0.500 kW	38M	24.3	18.0	
Broadcasting for the Challenged BPED-980108MI							

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EXHIBIT #2 (continued)

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-MI	R-KM R-MI	MARGIN (KM)
AP255 AP CN	255A 37 47 28	Galatia 88 42 02	IL 6.000 kW	19.7 100M	237.42 147.6	226.0 140.5	11.42
		W. Russell Withers, Jr.				941208MH	
AP255 AP CN	255A 37 47 02	Galatia 88 39 02	IL 6.000 kW	20.8 100M	238.24 148.1	226.0 140.5	12.24
		Southern Illinois Broadcasting				941205MB	
WYMX LI CY	256C 33 34 35	Greenwood 90 22 34	MS 100.000 kW	196.1 300M	254.41 158.1	241.0 149.8	13.41
		Telesouth Communications, Inc.				BLH-890724KB	
WYMX.C CP CY	256C 33 34 34	Greenwood 90 22 33	MS 100.000 kW	196.1 300M	254.43 158.1	241.0 149.8	13.43
		TeleSouth Communications, Inc.				BPH-980924IG	
WHOPFM LI CN	254C1 36 52 54	Hopkinsville 87 30 44	KY 100.000 kW	56.3 90M	224.67 139.6	209.0 129.9	15.67
		Hopkinsville Broadcasting Co.				BLH-790727AG	
WZLT LI CN	257A 35 38 05	Lexington 88 23 34	TN 5.000 kW	98.1 46M	111.60 69.4	95.0 59.0	16.60
		Lexington Broadcasting Services				BMLH-940811KA	
ALOPEN AL N	255A 37 50 53	Galatia 88 37 10	IL 0.000 kW	20.8 OM	245.87 152.8	226.0 140.5	19.87
		MM Docket #94-50	Window Closed	12/08/94			
AD257 AD	257A 35 28 21	Cherry Valley 90 51 51	AR 0.000 kW	253.5 OM	118.43 73.6	95.0 59.0	23.43
		Alalatex				RM-9340	
AD254 AD	254A 34 56 19	Cloverdale 87 46 17	AL 0.000 kW	118.8 OM	191.71 119.2	165.0 102.6	26.71
		Pulaski Broadcasting, Inc.				RM8472	940428
AP255 AP CN	255A 37 56 48	Galatia 88 36 49	IL 6.000 kW	20.0 100M	256.27 159.3	226.0 140.5	30.27
		Daniel R. Johnson				941208ML	
AP256 AP ZCN	256A 35 23 06	Pangburn 91 44 15	AR 3.800 kW	257.7 100M	197.54 122.8	165.0 102.6	32.54
		White County Broadcasting				BPH-970723MG	
ALOPEN AL N	256A 35 26 52	Pangburn 91 48 57	AR 0.000 kW	260.1 OM	203.01 126.2	165.0 102.6	38.01
		MM Docket #96-247	Window Closed	07/24/97			

KTMO LICENSED 60 dBu

FM SERVICES IN LOSS AREA

PROPOSED MUNFORD 60 dBu

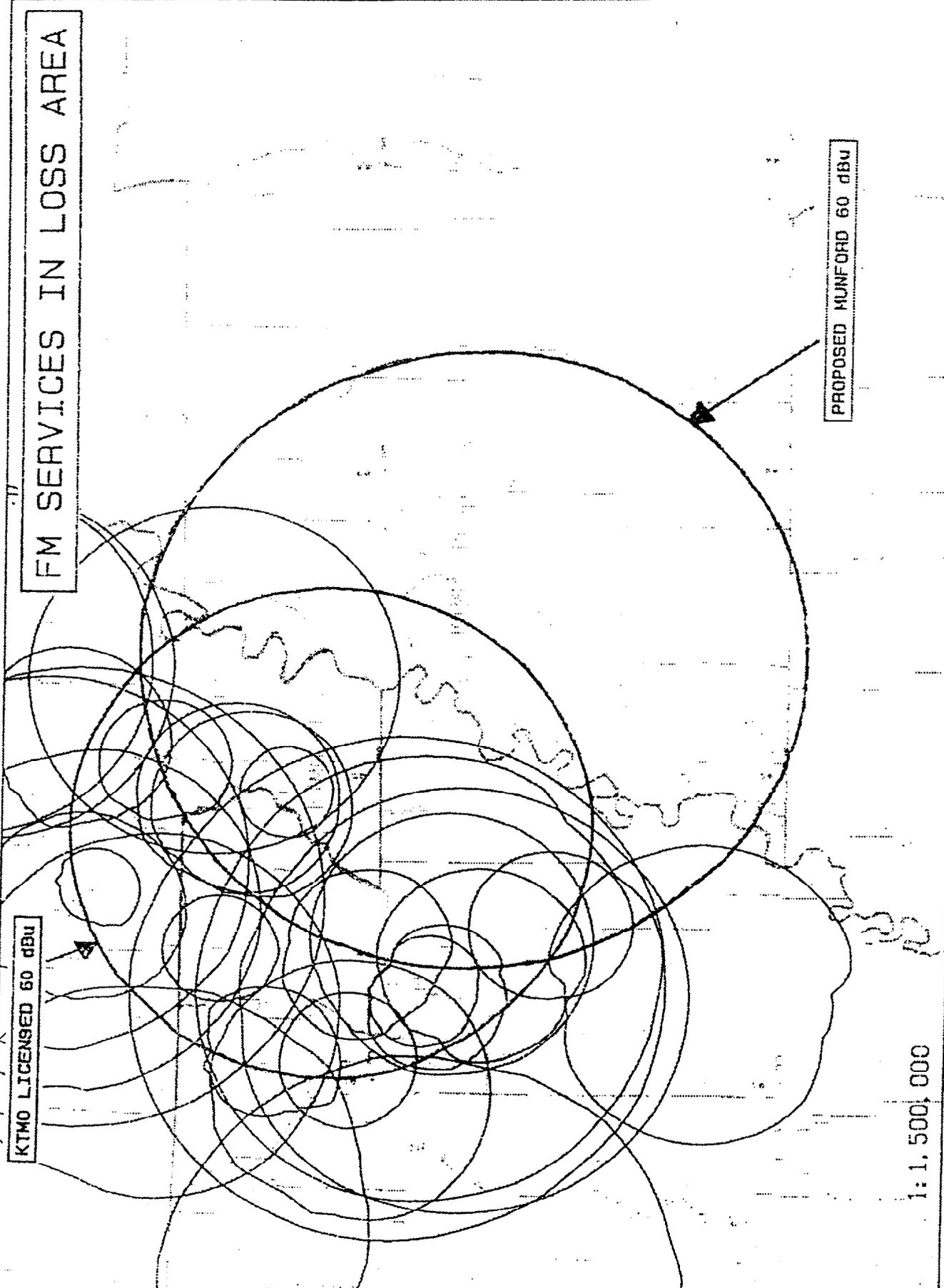
1:1,500,000

Scale in km

0 10 20 30 40 50 60 70 80 90

Comments & Counterproposal
Legend Communications, Inc.

Exhibit #3
Graham Brock, Inc.



**COUNTERPROPOSAL
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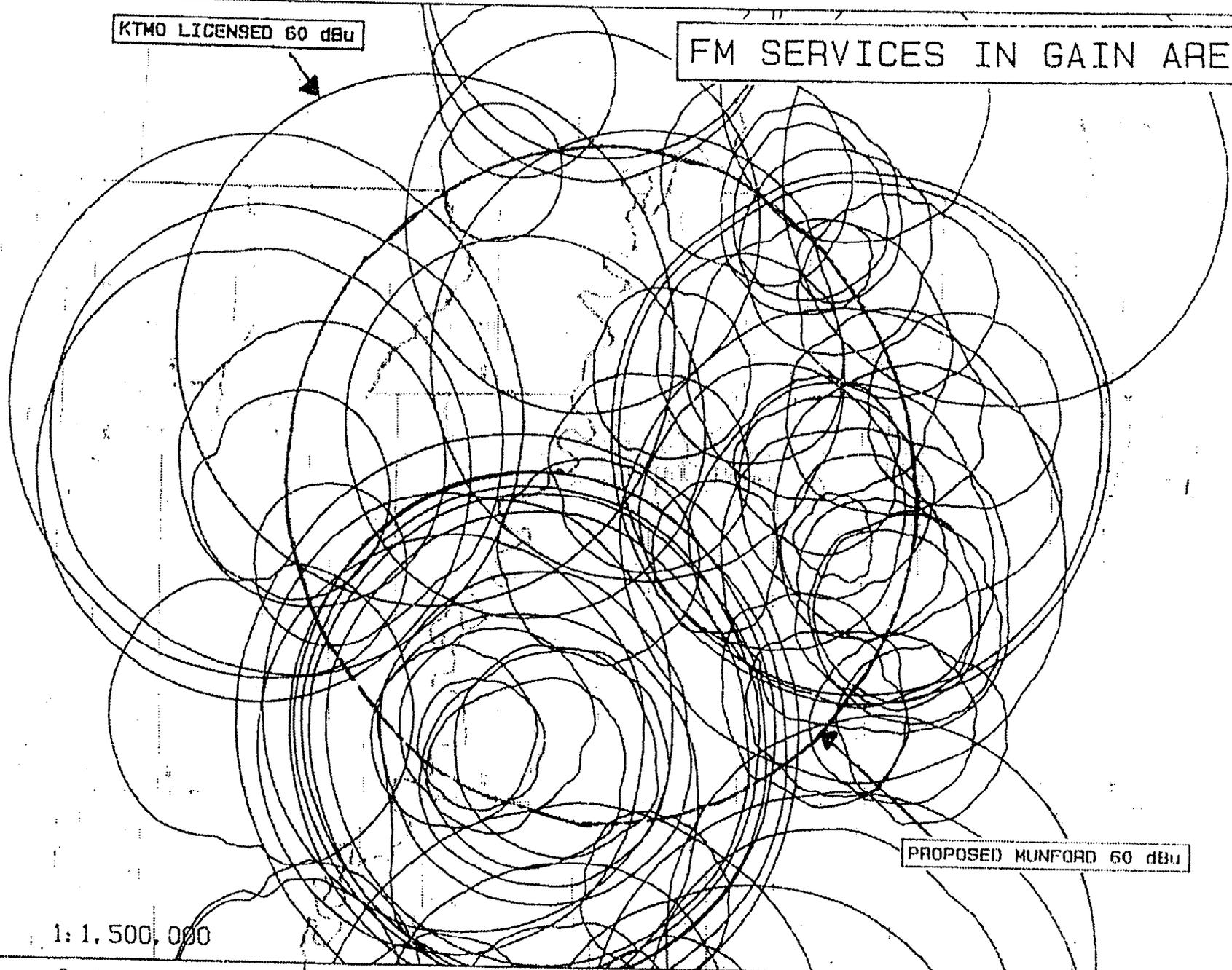
EXHIBIT #4

FM Services with 60 dBu Contour in KTMO Loss Area

KAHR	Ch 244A	Poplar Bluff, MO
KAMS	Ch 236C1	Mammoth Springs, AR
KAOG	Ch 213A	Jonesboro, AR
KASU	Ch 220C1	Jonesboro, AR
KAUF	Ch 210A	Kennett, MO
KBKG	Ch 228A	Corning, AR
KBOA-FM	Ch 288A	Piggott, AR
KBXB	Ch 250C2	Sikeston, MO
KDEX-FM	Ch 272A	Dexter, MO
KDEZ	Ch 262A	Jonesboro, AR
KDXY	Ch 285C3	Lake City, AR
KFIN	Ch 300C1	Jonesboro, AR
KIYS	Ch 270C	Jonesboro, AR
KJBR	Ch 229A	Marked Tree, AR
KJBX	Ch 294A	Trumann, AR
KJEZ	Ch 238C1	Poplar Bluff, MO
KKLR	Ch 233C1	Memphis, TN
KLQZ	Ch 296A	Paragould, AR
KLUH	Ch 213A	Poplar Bluff, MO
KMAL	Ch 224A	Malden, MO
KMIS-FM	Ch 293C2	New Madrid, MO
KOCY	Ch 287C3	Hoxie, AR
KOEA	Ch 248C2	Doniphan, MO
KOKS	Ch 208C1	Poplar Bluff, MO
KPOC-FM	Ch 280A	Pocahontas, AR
KRLW-FM	Ch 292A	Walnut Ridge, AR
KWKZ	Ch 291C2	Charleston, MO
KWYN-FM	Ch 223C2	Wynne, AR
KXOQ	Ch 282A	Kennett, MO
KZLE	Ch 226C	Batesville, AR

KTMO LICENSED 60 dBu

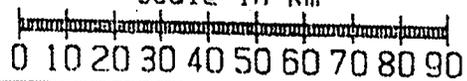
FM SERVICES IN GAIN AREA



PROPOSED MUNFORD 60 dBu

1:1,500,000

Scale in km



Comments & Counterproposal
Legend Communications, Inc.

Exhibit #5
Graham Brock, Inc.

COUNTERPROPOSAL
LEGEND COMMUNICATIONS, INC.
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KENNETT, MISSOURI

June 1999

EXHIBIT #6

FM Services with 50 dBu Contour in KTMO Gain Area.

WGKX	Ch 290C	Memphis, TN
WKNQ	Ch 214C1	Dyersburg, TN
WTVN	Ch 281C1	Jackson, TN
KASU	Ch 220C1	Jonesboro, AR
KBXB	Ch 250C2	Sikeston, MO
KDEX-FM	Ch 272A	Dexter, MO
KDXY	Ch 285C3	Lake City, AR
KFFA-FM	Ch 276C3	Helena, AR
KFIN	Ch 300C1	Jonesboro, AR
KHLS	Ch 242C1	Blytheville, AR
KIYS	Ch 270C	Jonesboro, AR
KJBR	Ch 229A	Market Tree, AR
KJBX	Ch 294A	Trumann, AR
KJTW-FM	Ch 233C3	Helena, AR
KJMS	Ch 266C1	Memphis, TN
KMAL	Ch 224A	Malden, MO
KMIS-FM	Ch Ch 293C2	New Madrid, MO
KTMO	Ch 255C	Kennett, MO
KWKZ	Ch 291C2	Charleston, MO
KWYN-FM	Ch Ch 223C2	Wynne, AR
KXHT	Ch 296A	Marion, AR
WAMP	Ch 201A	Jackson, TN
WASL	Ch 261A	Dyersburg, TN
WBLE	Ch 263C2	Batesville, MS
WCBF	Ch 271C3	Clinton, KY
WCDZ	Ch 236A	Dresden, TN
WCMT-FM	Ch 269A	Martin, TN
WEGR	Ch 274C1	Memphis, TN
WEVL	Ch 210C3	Memphis, TN
WFGE	Ch 279C1	Murray, KY
WFHC	Ch 218A	Henderson, TN
WFKX	Ch 239A	Henderson, TN
WHHM-FM	Ch 299A	Henderson, TN
WHKL	Ch 295A	Crenshaw, MS
WHRK	Ch 246C1	Memphis, TN
WIGH	Ch 204C2	Lexington, TN
WKBL-FM	Ch 228A	Covington, TN
WKNO-FM	Ch 216C1	Memphis, TN

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EXHIBIT #6 (continued)

WKWT	Ch 224A	Union City, TN
WLSQ-FM	Ch 232A	Dyer, TN
WLSZ	Ch 287A	Humboldt, TN
WMAE-FM	Ch 208C1	Booneville, MS
WMAV-FM	Ch 212C	Oxford, MS
WMC-FM	Ch 259C	Memphis, TN
WMFS	Ch 225A	Bartlett, TN
WMOD	Ch 244A	Bolivar, TN
WMXX-FM	Ch 276C2	Jackson, TN
WNWS-FM	Ch 268A	Jackson, TN
WOGY-FM	Ch 231C2	Germantown, TN
WOJG	Ch 234A	Bolivar, TN
WQLJ	Ch 229C3	Savannah, TN
WQOX	Ch 203C2	Memphis, TN
WRVR-FM	Ch 283C1	Memphis, TN
WRXQ	Ch 239A	Olive Branch, MS
WSIB	Ch 230A	Selmer, TN
WSRR-FM	Ch 251C1	Millington, TN
WTBG	Ch 237A	Brownsville, TN
WTKB-FM	Ch 229A	Atwood, TN
WTRB-FM	Ch 235A	Ripley, TN
WUMR	Ch 219C2	Memphis, TN
WUMS	Ch 221A	University, MS
WURC	Ch 201A	Holly Springs, MS
WUTM	Ch 212A	Martin, TN
WVHR	Ch 265A	Huntingdon, TN
WWEZ	Ch 248C3	Trenton, TN
WWGM	Ch 226C3	Alamo, TN
WWKF	Ch 257A	Fulton, KY
WWKZ	Ch 278C	New Albany, MS
WWMS	Ch 248C1	Oxford, MS
WWUC	Ch 289A	Union City, TN
WWYN	Ch 295C1	McKenzie, TN
WWZD-FM	Ch 294C2	New Albany, MS
WXOQ	Ch 288A	Selmer, TN
WYNU	Ch 222C	Milan, TN
WYPL	Ch 297A	Memphis, TN
WZDQ	Ch 272A	Humboldt, TN
WZLQ	Ch 253C1	Tupelo, MS

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

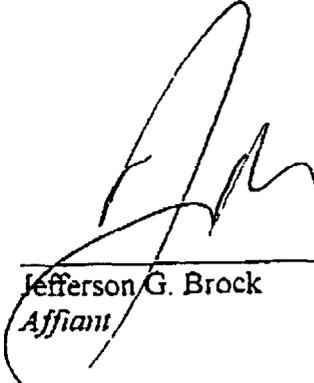
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Legend Communications, licensee of Radio Station KTMO, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

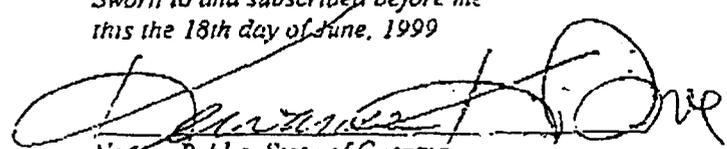
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 18th day of June, 1999.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 18th day of June, 1999*

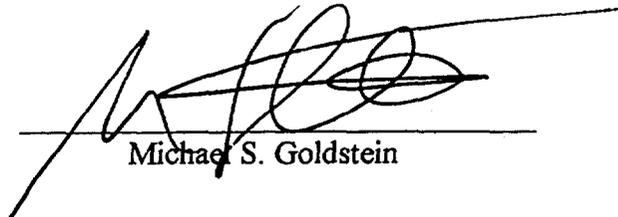


Notary Public, State of Georgia
My Commission Expires: April 20, 2002

CERTIFICATE OF SERVICE

I, Michael S. Goldstein, a secretary in the law offices of Shainis & Peltzman, Chartered, do hereby certify that on this 21st day of June, 1999, I had a copy of the foregoing "Comments and Counter Proposal" hand-delivered to:

John A. Karousos
Chief, Allocations Branch
Mass Media Bureau
Federal Communications Commission
445 - 12th Street, S.W., Room 3-A266
Washington, DC 20554



Michael S. Goldstein

EXHIBIT 2

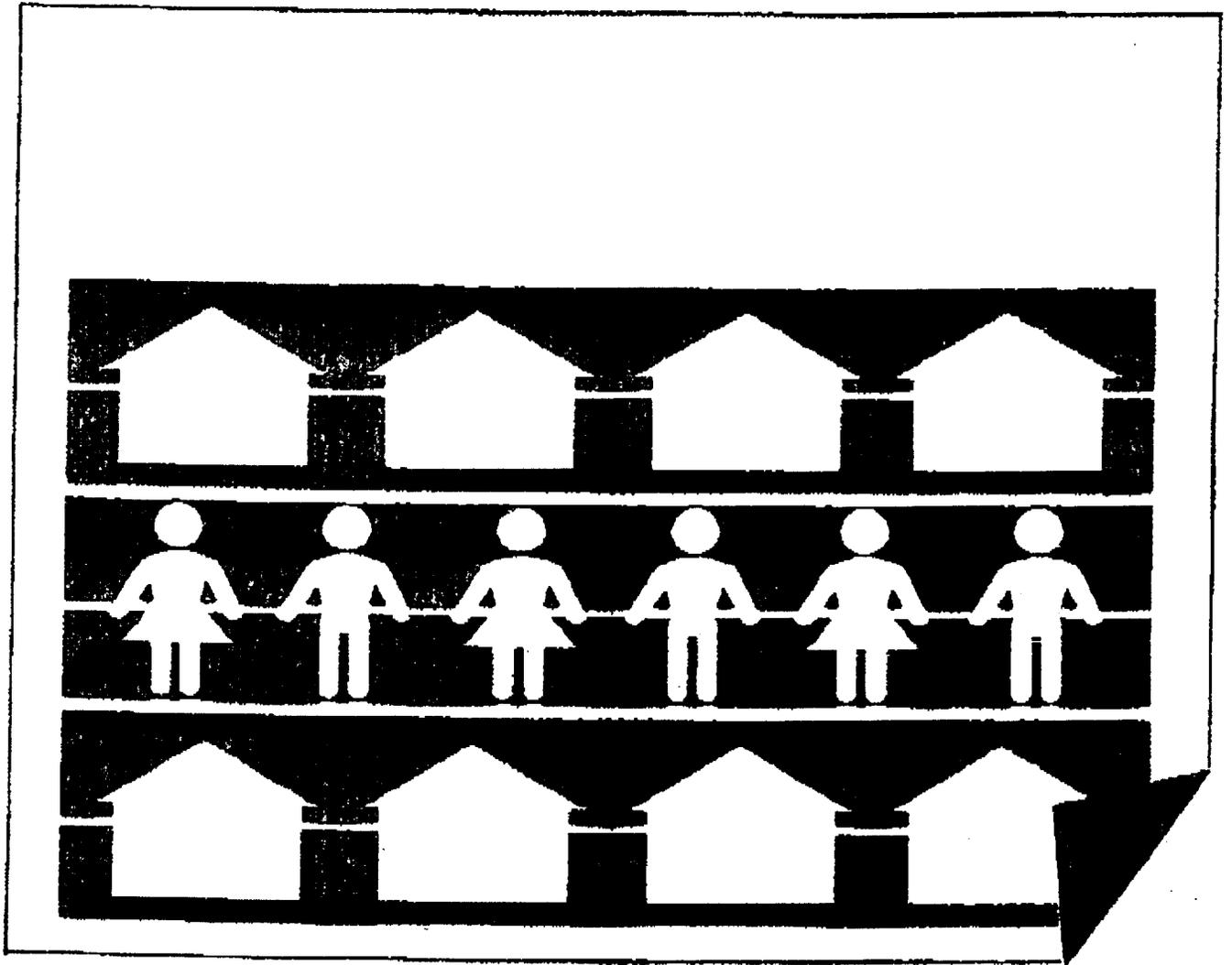
U.S. Department of Commerce
Economics and Statistics Administration
BUREAU OF THE CENSUS

1990 CPH-2-26

CENSUS '90



1990 Census of
Population and Housing
Population and Housing
Unit Counts
Mississippi



1990 CPH-2-26

**1990 Census of
Population and Housing
Population and Housing
Unit Counts
Mississippi**

Issued March 1993



**U.S. Department of Commerce
Ronald H. Brown, Secretary
John Reilwagen, Deputy Secretary
Economics and Statistics Administration
Jeffrey Mayer, Acting Under Secretary
for Economic Affairs
BUREAU OF THE CENSUS
Harry A. Sarr, Acting Director**

FRIARS POINT, MISSISSIPPI

Friars Point, which is approximately 137 years old, boasts the distinction of being the fourth settlement in Coahoma County and the oldest surviving one. The first three - Port Royal, Shufordsville and Delta - are no longer in existence.

It was in 1847 the Robert C. Friar, the first legislator from Coahoma County in 1838, donated a commons to the public in conjunction with the newly settled town of Friars Point. Two years later the Coahoms Masonic Lodge 104 of Friars Point was chartered.

Then, in 1850, Friars Point's political life began. In an election on choosing the county seat, Friars Point won over the former seat of Delta. Two years later, the town was incorporated under the name of "Union", but the name was changed to read "Point Friars" that same year.

In 1862, the county records at Friars Point were ordered to be moved to a place of safety from the Yankee gunboats which shelled the town under the direction of General William T. Sherman, who had a rendezvous with his army of 32,000 men in Friars Point on his way to Vicksburg.

Friars Point was incorporated at the close of the war in 1865. Four years later, J. L. Alcorn, a former resident of Friars Point was elected Governor of Mississippi.

Through the years, there had been such controversy with the county over the site of a permanent county seat, the rapidly growing town of Clarksdale was a likely nominee but

Friars Point still held the title. It had built a new frame courthouse in 1881.

Finally, in 1892, the question was compromised by a passage of an Act of the Legislature which divided the county into two judicial districts with seats of Justice at both Friars Point and Clarksdale. Two years later new brick courthouses were completed in both towns, in compliance with the Act of the Legislature.

It wasn't until 1930 that the age-old question over the county seat was finally settled. The two districts were abolished and Clarksdale became the sole county seat.

Friars Point can also boast of the first newspaper in Coahoma County - the weekly Coahomian, the first issue of which appeared September 22, 1865. This paper underwent various name changes, being titled the New Coahomian, the Friars Point Coahomian and, again, the Coahomian in 1931. It was moved to Clarksdale in 1932 and became the Clarksdale News.

It was during these years that Friars Point was a bustling river port serving the entire northwest section of the state.

The city government is composed of a mayor, five aldermen, and city clerk, all of whom are working for the development of the community. A regularly-paid marshal and nightwatchman make the regular night patrols of the business establishments.

There are volunteer firemen in Friars Point whose fire department is backed up by the equipment and personnel of

the Clarksdale Fire Department.

The principal income of the community in the early 1960's was derived from cotton, wheats, oats, soybeans, cattle and hogs. Agricultural activities were carried on at several small farms and larger plantations surrounding the community.

On March 9, 1852 the Town of Union, Coahoma County, State of Mississippi received a charter from the State of Mississippi, which is a record on page 238, Laws of 1852.

This charter was amended on October 16, 1852, as of record on Page 171, Extra Session of 1852.

On February 21, 1854 the name was changed to Friars Point, Coahoma County, State of Mississippi under the Laws of 1854 and a record on Page 410.

The Town was Re-incorporated on October 31, 1865, under the laws of 1865, on Page 421.

The limits were extended on March 31, 1873, as of House Bill No. 334, Enrolls Acts of 1873.

Accepts of Code Provision, June 20, 1892, Recorded Municipal Charter, Book 1, Page 37.

Population -----	Year ----
946	1940
916	1950
1,030	1960
1,177	1970
1,400	1980
1,334	1990

(POPULATION COUNT WAS DERIVED FROM STATE COUNT)

EXHIBIT 3

 **BELLSOUTH**



GET AN IDEA

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North Delta

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at: www.ypp.bellsouth.com

Including Clarksdale, Crenshaw,
Duncan, Friars Point, Jonestown,
Lula, Marks, Sledge, Sumner,
Tunica, and Tutwiler.

Includes customer listings for all local
telecommunications companies.

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**HELP US HELP YOU
USE ZIP CODE**



What Is The Postal Zip Code? How Does It Work? How Can You Help?

ZIP CODE is a five-digit code which identifies a delivery unit and associates that unit with a major post office through which mail is routed for delivery. The first digit identifies one of ten large areas of the nation. The first three digits identify a major city or distribution point. The

five digits identify an individual post office, a zone of a city, or other delivery unit. The ZIP CODE number is always written after the state, or on the line below the state. It is never to be written between the city and state.

LIST OF ZIP CODES FOR NEARBY COMMUNITIES

Town	Zip Code	Town	Zip Code
Alligator	38720	Lula	38644
Askew	38621	Lyon	38645
Batesville	38606	Marks	38646
Belen	38609	Mattson	38758
Clarksdale	38614	Rena Lara	38767
Coahoma	38617	Robinsonville	38664
Coldwater	38618	Rome	38768
Como	38619	Sarah	38665
Crenshaw	38621	Sardis	38666
Crowder	38622	Savage	38665
Darling	38623	Sherard	38669
Dublin	38739	Sledge	38670
Duncan	38740	Stovall	38614
Dundee	38626	Sumner	38957
Falcon	38628	Swan Lake	38958
Farrell	38630	Tunica	38676
Friars Point	38631	Tutwiler	38963
Horn Lake	38637	Vance	38964
Jonestown	38639	Walls	38680
Lake Cormorant	38641	Webb	38966
Lambert	38643		

**FOR ADDITIONAL ZIP CODE INFORMATION,
CALL YOUR LOCAL POST OFFICE.**

North Delta

Coahoma County was chartered February 9, 1836 following the Treaty of Dancing Rabbit Creek, and constitutes one of numerous counties formed from the Choctaw Cession of 1830. The county derives its name from the Choctaw word "Co-i-humma" meaning red panther. This name was indicative of the large number of panthers then inhabiting the upper regions of the Delta.

Hernando DeSoto, the Portuguese explorer, was on a personal quest for gold in the New World when he met and massacred the proud Choctaws before moving north to discover the Mississippi River in 1541. DeSoto first looked out over the "great river" at Sunflower Landing in what would become, three centuries later, Coahoma County. This was the oldest theory uncovered by the United States DeSoto Commission report of January, 1939.

Clarksdale, founded by John Clark in 1848, was incorporated in 1882, and is now the major city of the county. Located at the head of navigation on the Sunflower River, many of Clarksdale's businesses are built fronting this stream. The original site of Clarksdale was also the former intersection of two important Indian routes: The Chakchiuma Trade Trail which ran northeastward to old Pontotoc, and the Lower Creek Trade Paths, which extended westward from Augusta, Georgia, to New Mexico.

In 1892, Clarksdale became one of the seats of Coahoma County when a controversy of more than 10 years was compromised by the passage of an act of the legislature. This act divided the county into judicial districts with two seats of the justice: one at Friars Point, the other at Clarksdale. In 1930, the two judicial districts were abolished and Clarksdale became the county seat. Frequent floods, a fire in 1889, and very poor roads retarded the early growth of Clarksdale; but, since 1900 Clarksdale's growth has been consistent, and it is now one of the largest cities in the Yazoo-Mississippi Delta.

The first cotton crop commercially produced entirely by machinery, from planting to baling, was grown during the year 1944 on 28 acres owned by the Hopson Planting Company of Clarksdale. The soil was prepared, crop seeded and cultivated by machines, weeds eradicated by flame, and the crop harvested with a mechanical picker. Also, Clarksdale has the distinction of being the home of the first franchised Holiday Inn in the world. (Source: Linton Weeks, *Clarksdale & Coahoma County: A History*, Carnegie Public Library, Clarksdale, Mississippi, 1982.)

CLIMATE

The average normal temperature in January is 41 degrees and July is 83 degrees. Total normal

rainfall is 51.19 inches. Estimated average annual snowfall is two-three inches. Prevailing winds are south west. The average elevation is 175 feet.

POPULATION

The City of Clarksdale had an annexation approved in July, 1992 which increased its population to 21,148. The official 1990 census gave the county population as 31,665.

BANKING

Banks and branch banks are located in the majority of Coahoma County communities. First National Bank has a main office and two branches located in Clarksdale. Union Planters has a main office and two branch offices in Clarksdale and branch offices in Friars Point, Jonestown, and Lula. Deposit Guaranty Bank has a main office and two branches in Clarksdale. The Valley Bank has a branch bank in Clarksdale.

BUSINESS AND INDUSTRY

Agriculture: Coahoma County encompasses 357,760 acres or 559 square miles of land with agricultural enterprises utilizing approximately 76.5 percent of the land area. Principal crops of the county are corn, cotton, rice, soybeans and wheat, which comprised 310,000 planted acres in 1996. Their production was valued at \$133.7 million. Peanuts are also grown in Coahoma County and the county is the leading producer of Spanish peanuts in Mississippi. In 1996, approximately 2,065 acres were planted with Spanish peanuts and 2,900 tons produced. The gross revenue to farmers was \$1.5 million. The only peanut elevator (Jonestown Peanut Elevator) in Mississippi is located in Coahoma County. Cattle are raised in the county on a minor scale and contribute to the area's general economy.

Manufacturing: Coahoma County is considered a prime industrial location due to its geographic, economic and political advantages. The six incorporated communities in Coahoma County are: Clarksdale, Coahoma, Friars Point, Jonestown, Lyon and Lula. In 1984, Coahoma County gained status as an Enterprise Zone. Coahoma County has been certified as a Mississippi Key Community. Manufacturing plants in Coahoma County employ over 1,500 persons. Two industrial parks contain available sites in the county. The Sunbelt Industrial Park and the Leonard Pharr Industrial Park consist of over 200 available acres.

COUNTY GOVERNMENT

Coahoma County is governed by a five-man Board of Supervisors. The supervisors are publicly elected but designate their own president.

LIBRARY

The Carnegie Public Library and Delta Blues Museum at 114 Delta Avenue serve the Coahoma County area with a collection of 90,000 books, records, periodicals and other library material.

TRANSPORTATION

Highways: U. S. Highway 61 runs in a north-south direction through Coahoma County connecting it with Memphis, Tennessee, to the north, and Baton Rouge, Louisiana, to the south. U. S. Highway 49, also a major southern artery, connects Coahoma County to Jackson, Mississippi, the state capital, and the Gulf Coast area. State Highways 1, 6, 316 and 322 traverse the county and connect with paved roads offering quick and convenient access to all points in the area.

Air Transportation: Clarksdale's Fletcher Field Airport is a general purpose aviation facility with a 5,400 foot asphalt, lighted runway. Charter service is available, as well as maintenance, fuel and flight instruction by the FBO.

Water Transportation: Four major slack-water ports, within a 100 mile radius, are easily accessible to Coahoma County: Memphis, Helena, Greenville and Rosedale. All four ports operate barge, warehouse, and harbor facilities and maintain a minimum nine-foot channel depth. Ports at Greenville and Memphis are U. S. Customs Ports of Entry. A privately-owned port facility is located in Friars Point and provides tug, fleeting, crane and off-loading services to the public.

EDUCATION

Coahoma County has two public school districts; Coahoma County and Clarksdale Municipal Separate School Districts. Both districts provide elementary and secondary levels of education, and all schools are accredited by the Mississippi Commission of School Accreditation. Six private and parochial schools serve Coahoma County, with all six schools located in the Clarksdale area. Each school is accredited by the Mississippi State Department of Education and offers standard, traditional studies. Five of the schools are religiously affiliated and provide elementary levels of education. Lee Academy is nondenominational and college preparatory. Coahoma Community College, a two-year community college, provides not only academic courses, but also industrial training, vocational-technical courses and adult education.

MOTELS

There are six motels in Clarksdale and one in Coahoma County inside the Lady Luck Casino.

MEDICAL

Northwest Mississippi Regional Medical Center serves the Coahoma County area with a 194 bed capacity. There are three nursing homes with a 306 bed capacity. The Coahoma County Health Department in Clarksdale provides personal and environmental services to all residents of the county.

CITY GOVERNMENT

Clarksdale operates under a commission form of government in which four commissioners and mayor are elected. The other five incorporated communities in Coahoma County have aldermen elected from wards and the mayors elected at large.

CHURCHES

There are 50 different places of worship in Coahoma County.

ADDITIONAL INFORMATION

Publications, information and demographic data relating to Clarksdale, Coahoma County and the other towns in the county can be obtained by calling the Chamber of Commerce at 627-7337. Technical information on industrial sites and incentives can be obtained by contacting the Industrial Foundation at 627-7337.

PARKS AND RECREATION

Hunting and fishing on DeSoto Lake, Stovall Old River and Moon Lake are all within 30 minutes of Clarksdale. Numerous ball fields, swimming pools, tennis courts and parks are accessible to all residents of the county. One particular point of interest is the Delta Blues Museum, which houses blues memorabilia of all kinds. Other recreational facilities include a skating rink, 16-lane bowling alley and an auditorium. Two private clubs are located in Coahoma County. The Clarksdale Country Club is located on Friars Point Road with an 18-hole golf course and clubhouse. The Coahoma County Country Club is located on U. S. Highway 61 and operates a nine-hole golf course and clubhouse.

**THE INFORMATION IN THESE PAGES
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SERVICE BY BELL SOUTH.**