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July 12, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554

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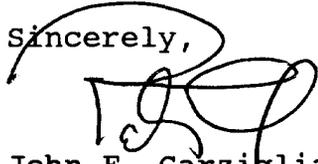
Re: **Amendment of Section 73.202(b)**
Table of Allotments
FM Broadcast Stations,
(Bethel Springs, Tennessee)
MM Docket No. 99-196; RM-9619

Dear Ms. Salas:

Transmitted herewith on behalf of Thunderbolt Broadcasting Company, is an original and four copies of its Comments and Counterproposal(s) in response to the above-referenced rule making proceeding pursuant to the Notice of Proposed Rule Making, DA 99-973, released May 21, 1999.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,


John F. Garziglia
Patricia M. Chuh

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 99-196
Table of Allotments)	RM-9619
FM Broadcast Stations,)	
(Bethel Springs, Tennessee))	

To: Chief, Allocations Branch

COMMENTS AND COUNTERPROPOSALS

Thunderbolt Broadcasting Company ("Thunderbolt"), the licensee of WCMT-FM, Martin, Tennessee, by its attorneys, hereby submits its Comments and Counterproposals in response to the instant rule making proceeding ("Bethel Springs NPRM") pursuant to the Notice of Proposed Rule Making, DA 99-973, released May 21, 1999.^{1/} Because there is a pending rule making proceeding that conflicts with the Bethel Springs rule making proceeding, Thunderbolt hereby respectfully requests that the Commission hold the Bethel Springs rule making proceeding in abeyance until the Commission first resolves the conflicting rule making proceeding that is still pending before the Commission.

In addition, Thunderbolt hereby proposes two counterproposals ("Option I" and "Option II"), both of which will result in a more preferential arrangement of FM allotments over the allotment proposed in the Bethel Springs NPRM under the guidelines set forth in

^{1/} The Bethel Springs NPRM established July 12, 1999 as the deadline for filing comments and counterproposals. Accordingly, the instant Comments and Counterproposals are timely filed.

Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982). In support whereof, the following is submitted for the Commission's consideration:

Conflicting Rule Making Proceeding

1. The Bethel Springs NPRM, which proposes the allotment of Channel 249A to Bethel Springs, Tennessee as that community's first local aural transmission service, directly conflicts with a pending allotment proposal in MM Docket No. 96-204, RM-8876 and RM-9015, concerning the communities of Martin, Tiptonville, and Trenton, Tennessee. The petitioner of the Martin, Tiptonville, and Trenton rule making proceeding (Thunderbolt) seeks: (1) the substitution of Channel 267C3 for Channel 269A at Martin, Tennessee and the modification of the license of WCMT-FM to specify operation on Channel 267C3 (RM-8876), (2) the substitution of Channel 247A for vacant Channel 267C3 at Tiptonville, Tennessee, and (3) the substitution of Channel 249C3 for Channel 248C3 at Trenton, Tennessee and the modification of the license of WWEZ(FM) to specify operation on Channel 249C3 (RM-9015).^{2/}

2. Although the Allocations Branch adopted a Report and Order in the Martin, Tiptonville, and Trenton rule making proceeding, which did not adopt Thunderbolt's ultimate allotment proposal,^{3/} a petition for reconsideration of the Report and Order is still pending before the Commission. Thunderbolt filed a Petition for Reconsideration of the Report and Order on October 19, 1998. The Commission has not yet taken any action to date.

^{2/} See Notice of Proposed Rule Making, 11 FCC Rcd 12695, MM Docket No. 96-204, RM-8876 and RM-9015 (1996). See also November 25, 1996 Comments and Counterproposal of Petitioner.

^{3/} See Report and Order, DA 98-1799, MM Docket No. 96-204, RM-8876 and RM-9015, released September 11, 1998 ("Report and Order").

Accordingly, the Commission ~~must~~ hold the Bethel Springs rule making proceeding in abeyance until the Commission first takes action on the Martin, Tiptonville, and Trenton rule making proceeding.

Counterproposals

3. Option I. In lieu of the allotment proposed in the Bethel Springs NPRM, Thunderbolt proposes the following counterproposal: (1) the substitution of Channel 267C3 for Channel 269A at Martin, Tennessee, the reallocation of Channel 267C3 to South Fulton, Tennessee as that community's first local aural transmission service, and the modification of the license of WCMT-FM to specify operation on Channel 267C3 at South Fulton, Tennessee, (2) the substitution of Channel 247A for vacant Channel 267C3 at Tiptonville, Tennessee, and (3) the substitution of Channel 249C3 for Channel 248C3 at Trenton, Tennessee and the modification of the license of WVEZ(FM) to specify operation on Channel 249C3.

4. The counterproposal proposed in Option I is in conflict with the Bethel Springs proposal as a result of the proposed substitution of Channel 249C3 for Channel 248C3 at Trenton, Tennessee. See Attached Technical Report, at Exhibit E-4. As shown in Exhibit E-1 of the Technical Report, the proposed upgrade of WCMT-FM to Channel 267C3 at South Fulton, Tennessee in Option I is entirely mutually exclusive with the licensed operation of WCMT-FM on Channel 269A at Martin, Tennessee, which qualifies the proposal in Option I for an upgrade without consideration of competing proposals. See 47 C.F.R. Section 1.420(i); Modification of FM Broadcast Licenses to Higher Class Co-Channels or Adjacent Channels, 60 RR 2d 114, 120 (1986). The proposed upgraded WCMT-FM facility on Channel 267C3 at South Fulton, Tennessee may be allocated at reference coordinates 36-26-27 North Longitude;

088-58-00 West Latitude, at 9.26 km Southwest of South Fulton, Tennessee (reference point (36-29-31 North Longitude; 088-53-06 West Latitude). See Technical Report, at Exhibit E-1.

5. As for the proposed substitution of Channel 247A at Tiptonville, Tennessee for vacant Channel 267C3, Channel 247A may be allocated at the Tiptonville reference point in accordance with all FCC allocations requirements with the substitution of Channel 249C3 for Channel 248C3 at Trenton, Tennessee. See Technical Report, at Allocation Study E-3. Since this proposed substitution involves vacant channels, there is no loss of service (from the existing allotment of Channel 267C3 as compared to the proposed allotment of Channel 247A). Furthermore, the Commission does not make a distinction between a Class A allotment and a higher class allotment in awarding a channel to provide first local service to a community (Tiptonville). In fact, Commission precedent requires the allotment of a lesser class channel to provide first local service to a community in lieu of a proposed higher class channel, when there is an expression of interest in the lesser class channel and there is no showing that the lesser class channel is insufficient to provide coverage to that community. Most importantly, the Commission treats an unactivated channel as a new allotment proposal when comparing alternate allotment proposals. Therefore, no equities or special considerations may be given to the fact that the channel at issue here is a vacant, unactivated channel.

6. In Americus, Fort Valley and Smithville, Georgia, 6 FCC Rcd 942 (1991), a Class A channel was allotted in place of Class C3 channel to provide Smithville with its first local service where the allotment of the Class A channel also allowed for the upgrade of a station at Fort Valley and there was an expression of interest in the Class A channel at

Smithville. As provided for in Americus, Fort Valley and Smithville, Georgia, the allotment of the Class A channel to Tiptonville will allow WCMT-FM to upgrade to Channel 267C3 at South Fulton, Tennessee, providing South Fulton with its first local aural transmission service, while at the same time retaining Channel 247A at Tiptonville for the provision of first local aural transmission service to Tiptonville in the future. See also, Cottage Grove and Bend, Oregon, 6 FCC Rcd 4208 (1991)(Class A channel allotted in lieu of a Class C1 channel to provide first local service where there was an expression of interest in the Class A channel and no showing that the lesser class channel could not cover the community); Durango and Telluride, Colorado, and Kirtland, New Mexico, 5 FCC Rcd 7467 (1990)(Class C1 channel was allotted instead of a Class C channel to provide first local service where there was no showing that the lesser class channel would not provide coverage to that community).

7. Thunderbolt hereby certifies its intention to reimburse the licensee of WWEZ(FM) for the reasonable costs of changing frequencies should the Commission adopt the counterproposal in Option I.^{4/} Furthermore, Thunderbolt hereby certifies that it will file an application to specify operation of WCMT-FM on Channel 267C3 at South Fulton, Tennessee when Channel 267C3 is substituted for Channel 269A at Martin, Tennessee and reallocated to South Fulton, Tennessee, and when authorized, to promptly build the modified WCMT-FM facilities and commence operation. Further, Thunderbolt hereby states its interest in Channel 247A at Tiptonville and certifies that it will file an application for Channel 247A at Tiptonville when allotted, and when authorized, promptly build a facility.

^{4/} Circleville and Columbus, Ohio, 8 FCC Rcd 159 (1967).

8. Option II. Alternatively, Thunderbolt proposes the following counterproposal in lieu of the allotment proposed in the Bethel Springs NPRM: (1) the substitution of Channel 267C3 for Channel 269A at Martin, Tennessee, the reallocation of Channel 267C3 to South Fulton, Tennessee as that community's first local aural transmission service, and the modification of the license of WCMT-FM to specify operation on Channel 267C3 at South Fulton, Tennessee, (2) the substitution of Channel 247C3 for vacant Channel 267C3 at Tiptonville, Tennessee,^{5/} (3) the substitution of Channel 249C3 for Channel 248C3 at Trenton, Tennessee and the modification of the license of WWEZ(FM) to specify operation on Channel 249C3, (4) the substitution of Channel 228A for Channel 247A at Marble Hill, Missouri and the modification of the outstanding construction permit of KBGJ(FM) to specify operation on Channel 228A,^{6/} and (5) the modification of the transmitter site for KGKS(FM) on Channel 230C3 at Scott City, Missouri.^{7/}

9. Because KBGJ(FM) on Channel 228A at Marble Hill, Missouri is short-spaced to KGKS(FM), Channel 230C3, Scott City, Missouri,^{8/} Thunderbolt is seeking consent from Zimmer Radio of Mid-Missouri, Inc., the licensee of KGKS(FM), to implement a change in the transmitter site for KGKS(FM), if required, to accommodate the proposed substitution of

^{5/} See Technical Report, at Exhibit E-7, for allocation study.

^{6/} See Technical Report, at Exhibit E-9.

^{7/} Id.

^{8/} KGKS(FM) is currently licensed as a Class A facility (FCC File No. BLH-980922KA). However, KGKS(FM) has an outstanding construction permit for Channel 230C3 (FCC File No. BPH-981026IA) and a pending license application to cover the Class C3 construction permit (FCC File No. BLH-990528KB).

Channel 228A (in lieu of Channel 247A) for KBGJ(FM) at Marble Hill, Missouri in support this counterproposal. See Technical Reports, at Exhibits 10 and 11.

10. Because this Option II counterproposal only involves the substitution of two (2) other channels occupied by existing FM stations (WWEZ(FM), Trenton, Tennessee and KBGJ(FM), Marble Hill, Missouri) in order to accommodate the upgrade of WCMT-FM, consideration of the Counterproposal is proper. See Columbus, Central City, Crookston, Kearney, Lexington, McCook and Valentine, Nebraska; and Hill City, Kansas, 59 RR 2d 1184 (1986)(the Commission will not entertain allotment proposals which involve more than two channel substitutions of existing FM stations absent consent by all but two parties or in the absence of significant public interest benefits). 49 RR 2d at 1185 (emphasis added). The substitution of Channel 247C3 for vacant Channel 267C3 at Tiptonville, Tennessee is not counted towards the limit of two channel substitutions because it is a vacant channel. Id.

11. Thunderbolt hereby certifies its intention to reimburse the licensees of WWEZ(FM) and KBGJ(FM) for the reasonable costs of changing frequencies should the Commission adopt the counterproposal proposed in Option II.^{9/} Furthermore, Thunderbolt hereby certifies that it will file an application to specify operation of WCMT-FM on Channel 267C3 at South Fulton, Tennessee when Channel 267C3 is substituted for Channel 269A at Martin, Tennessee and reallocated to South Fulton, Tennessee, and when authorized, to promptly build the modified WCMT-FM facilities and commence operation.

Adoption of Either Counterproposal
Results in a Preferential Arrangement of the FM Allotments

^{9/} Circleville and Columbus, Ohio, 8 FCC Rcd 159 (1967).

12. South Fulton, Tennessee is a “community” for allotment purposes, in accordance with the Commission’s policy. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 100 (1982); Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations, (Cleveland and Ebenezer, Mississippi), 10 FCC Rcd 8807 (1995). The requirement of an allocation to a community is generally satisfied if the community is either incorporated or listed in the U.S. Census. South Fulton, Tennessee is an incorporated place, with a 1990 U.S. Census population of 2,688 persons. In addition, South Fulton, Tennessee is self-governing with its own mayor, four alderman board of government, city manager, police department, fire department, public works department, and cooperative ambulance service. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982)(it is sufficient that the community is incorporated for allotment purposes); Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations, (Asbury, Iowa), 5 FCC Rcd 5712 (1990)(public interest would be served by allotting to a community that is incorporated and self-governing). See also Attached Statement of Paul F. Tinkle [concerning South Fulton, Tennessee]. Further, there are several thriving industries in South Fulton, Tennessee (e.g., Stanley Jones Corporation, W.S.W. Manufacturing, Waymatic, Jiffy Steamer, Thomas Plating, Martin Tool and Dye, Liggett Manufacturing) in addition to a number of schools, health care facilities, retail businesses, financial institutions, and churches.^{10/}

13. The counterproposals proposed in Option I and Option II both result in a preferential arrangement of FM allotments as compared to the allotment proposed in the

^{10/} Id.; cf., Attached Statement of Paul F. Tinkle [concerning Bethel Springs, Tennessee].

Bethel Springs NPRM, under the guidelines set forth in Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982).^{11/} Because both counterproposals proposes first local aural transmission service to South Fulton, Tennessee, while the Bethel Springs NPRM proposes first local aural transmission service to Bethel Springs, Tennessee, the communities of South Fulton and Bethel Springs are initially equal for allotment purposes under priority 3 of the Commission's allotment policies. Id. It is well settled, however, that when choosing between proposed allotments for two communities (to provide a first local aural transmission service), the Commission bases its decision on a community population comparison. See Blanchard, Louisiana and Stephens, Arkansas, 10 FCC Rcd 9828, 9830 (1995) (allotment awarded to the larger of two communities where both are deserving of first local transmission service); Stanford and Whitesboro, New York, 7 FCC Rcd 1674 (1992) (larger of two communities receives the allotment). Thus, South Fulton, Tennessee, with a population of 2,688 persons (1990 U.S. Census), should be preferred over Bethel Springs, Tennessee with a population of only 755 persons (1990 U.S. Census).

14. In addition to providing first local aural transmission service to South Fulton, Tennessee, the upgrade of WCMT-FM to Channel 267C3 at South Fulton, Tennessee will serve a total area of 4,803 square kilometers serving 85,323 persons (based on a uniform 39.1 km 609 dBu and the 1990 U.S. Census), resulting in a gain in area served of 2,368 square kilometers (+97.2%) and a gain in population served of 25,075 persons (+41.6%). See Technical Report, at Exhibit E-6. Furthermore, the existing 60 dBu contour of WCMT-FM

^{11/} The priorities are (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters [co-equal weight given to priorities (2) and (3)].

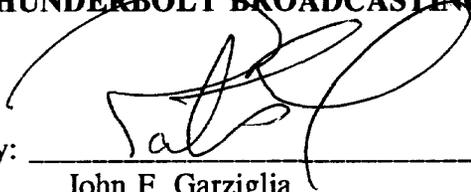
(currently licensed on Channel 269A at Martin, Tennessee) is entirely contained in the 60 dBu contour of the proposed upgraded facilities of WCMT-FM. Accordingly, there will be no loss of service. Id.

WHEREFORE, for the foregoing reasons, the Commission should hold the Bethel Springs rule making proceeding in abeyance until the Commission first takes action on the Martin, Tiptonville, and Trenton rule making proceeding. In the alternative, the Commission should adopt the counterproposals proposed in Option I or Option II because the adoption of either of these counterproposals will result in a more preferential arrangement of FM allotments than the allotment proposed in the Bethel Springs NPRM.

Respectfully submitted,

THUNDERBOLT BROADCASTING COMPANY

By: _____


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July 12, 1999

TECHNICAL REPORT

This technical report has been developed in support of a counterproposal to MM Docket No. 99-196 which proposes the allocation of 249A to Bethel Springs, TN. The two counterproposal options are in conflict with the Bethel Springs rule making as a result of the proposed substitution of 249C3 for 248C3 at Trenton, TN. The two are entirely mutually exclusive.

I. ALLOCATION ANALYSIS

The instant counterproposal requests the upgrade and reallocation of station WCMT-FM, currently licensed on channel 269A at Martin, TN, to specify operation on second adjacent channel 267C3 at South Fulton, TN as that community's first local service. Two options for accomplishing this objective are proposed.

Option I

<u>Community</u>	<u>Present</u>	<u>Proposed</u>	<u>Coordinates</u>
South Fulton, TN	----	267C3	N36-26-27 W88-58-00 (9 km SW)
Martin, TN	269A	---	
Tiptonville, TN	267C3	247A	N36-22-42 W89-28-30 (Community reference pt)
Trenton, TN	248C3	249C3	N36-05-10 W 88-54-39 (WWEZ licensed site)

Exhibit E-1 demonstrates that the proposed reallocation is entirely mutually exclusive with the WCMT-FM licensed operation at Martin, TN, and that the proposed WCMT-FM facility on 267C3 may be allocated at an arbitrary reference point -- **N 36-26-27 W 88-58-00** -- 9.26 km southwest of the South Fulton, TN reference point (N36-29-31 W 88-53-06). Exhibit E-2 shows that a maximum 267C3 70 dBu contour will

encompass the South Fulton boundaries, and Exhibit E-5 demonstrates that there is a clear line of sight to the community from the proposed allocation point with 100 meter HAAT.

Allocation study E-3 shows that 247A may be assigned at the Tiptonville reference point with the substitution of 249C3 for 248C3 at Trenton, TN. Exhibit E-4 shows the Trenton 249C3 substitution, and clearly demonstrates the conflict with the Bethel Springs, TN 249A proposal. The petitioner will reimburse the Trenton station, WWEZ, for the costs of changing frequency in accordance with Commission policy.

Option II

Community	Present	Proposed	Coordinates
South Fulton, TN	----	267C3	N36-26-27 W88-58-00 (9 km SW)
Martin, TN	269A	---	
Tiptonville, TN	267C3	247C3	N36-25-56 W89-28-38 (6 kilometers north)
Trenton, TN	248C3	249C3	N36-05-10 W 88-54-39 (WWEZ licensed site)
Marble Hill, MO	247A	228A	N37-22-49 W90-04-49 (KBGJ.CP)
Scott City, MO	230C3	230C3	N37-21-27 W89-36-45 (Modified site for KGKS)

An allocation study for channel 247C3 at Tiptonville, TN is included as Exhibit E-7. The site specified for 247C3 is an arbitrary reference point, and is believed to be useable. However, Exhibit E-8 demonstrates the substantial area within which 247C3 may be assigned to Tiptonville including a large area in Missouri. . E-8 also demonstrates that 247C3 will provide a 70 dBu contour over Tiptonville. Exhibit E-9 shows the allocation of channel 228A at the authorized site

for KBGJ on 247A at Marble Hill, MO with a slight change in site for station KGKS on channel 230C3 at Scott City, MO.

The licensee of station KGKS has consented to a slight change in transmitter site, if required, to accommodate the assignment of channel 228A at Marble Hill (see Exhibit E-10 based on an arbitrary site change). There is a significant area within which the KGKS site could be relocated utilizing Section 73.215 processing to station WMIX-FM at Mount Vernon, IL and KSPQ at West Plains, MO. An interference plot is provided from the arbitrary site (E-11) showing clearance to WMIX utilizing the current KGKS directional antenna. It is noted that KGKS is already authorized as a Section 73.215 station utilizing a directional antenna. The existing facility will fully clear a maximum class A KBGJ 228A facility without any change in site.

It is also noted that channel 254A may be assigned to Bethel Springs, TN if the pending application for review regarding the proposed assignment of channel 254A at Cloverdale, AL is not granted (A petition for reconsideration has already been denied). This alternate channel is noted here for information purposes because it would not appear to be permissible to propose it at this time contingent on the outcome of the application for review.

II. POPULATION AND AREA ANALYSIS

Exhibit E-6 demonstrates that the existing WCMT-FM 60 dBu will be contained within the proposed 267C3 60 dBu. Thus, there will be no loss of service. In addition to providing a new first local service at South Fulton, TN, the 267C3 allocation will serve a total area of 4,803 square kilometers with a population of 85,323 based on a uniform 39.1 km 60 dBu contour and the 1990 Census. The resulting gain in area served is 2,368 square kilometers (+97.2%), and the gain in population served is 25,075 (+41.6%).

III. CONCLUSION

It is concluded that WCMT-FM's licensed facility on channel 269A may be reallocated to South Fulton, TN on channel 267C3 through either of two options providing a first local service, a gain in population served of 25,075(+41.6%), and a gain in area served of 2,368 square kilometers (+97.2%).

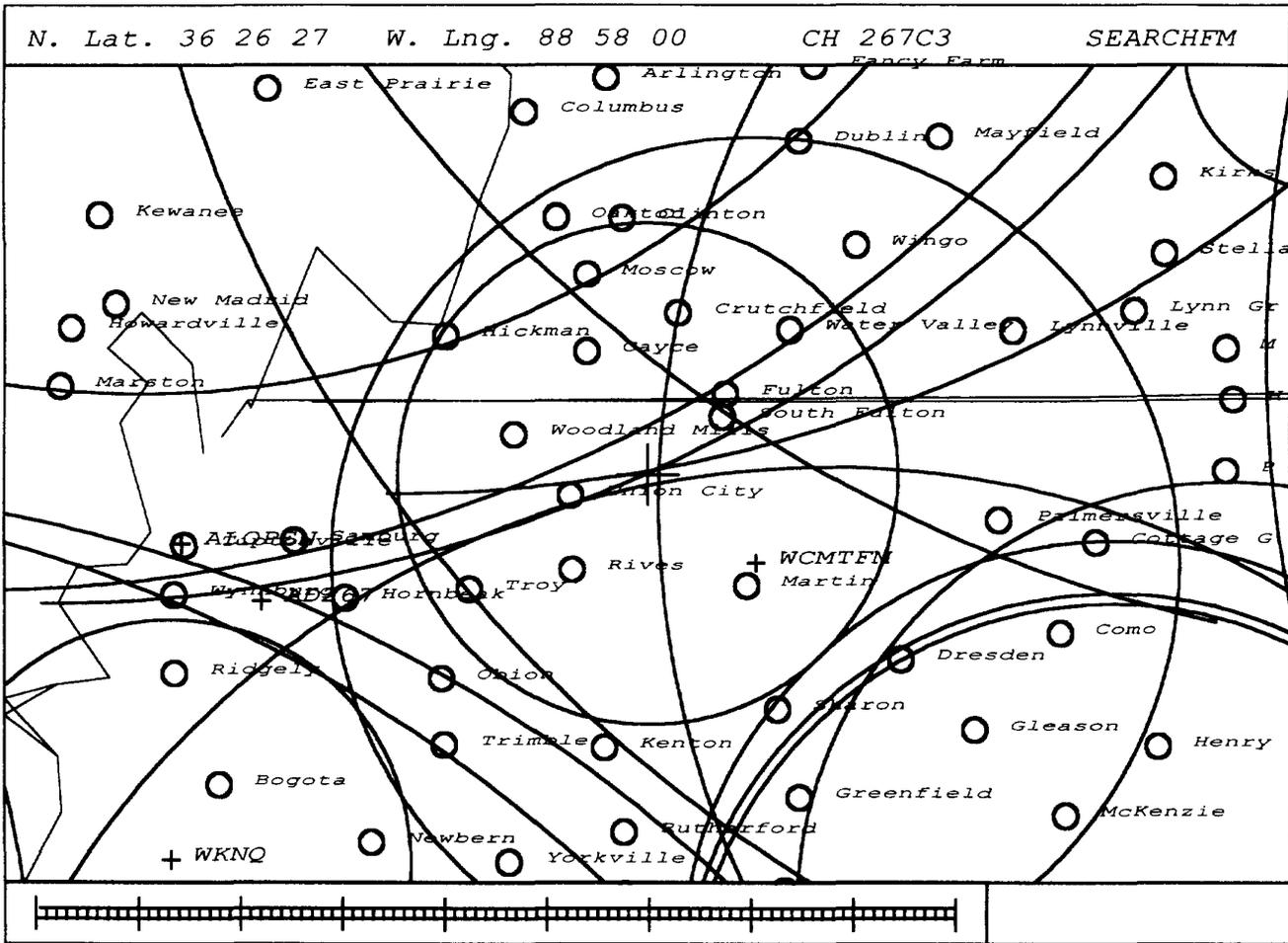
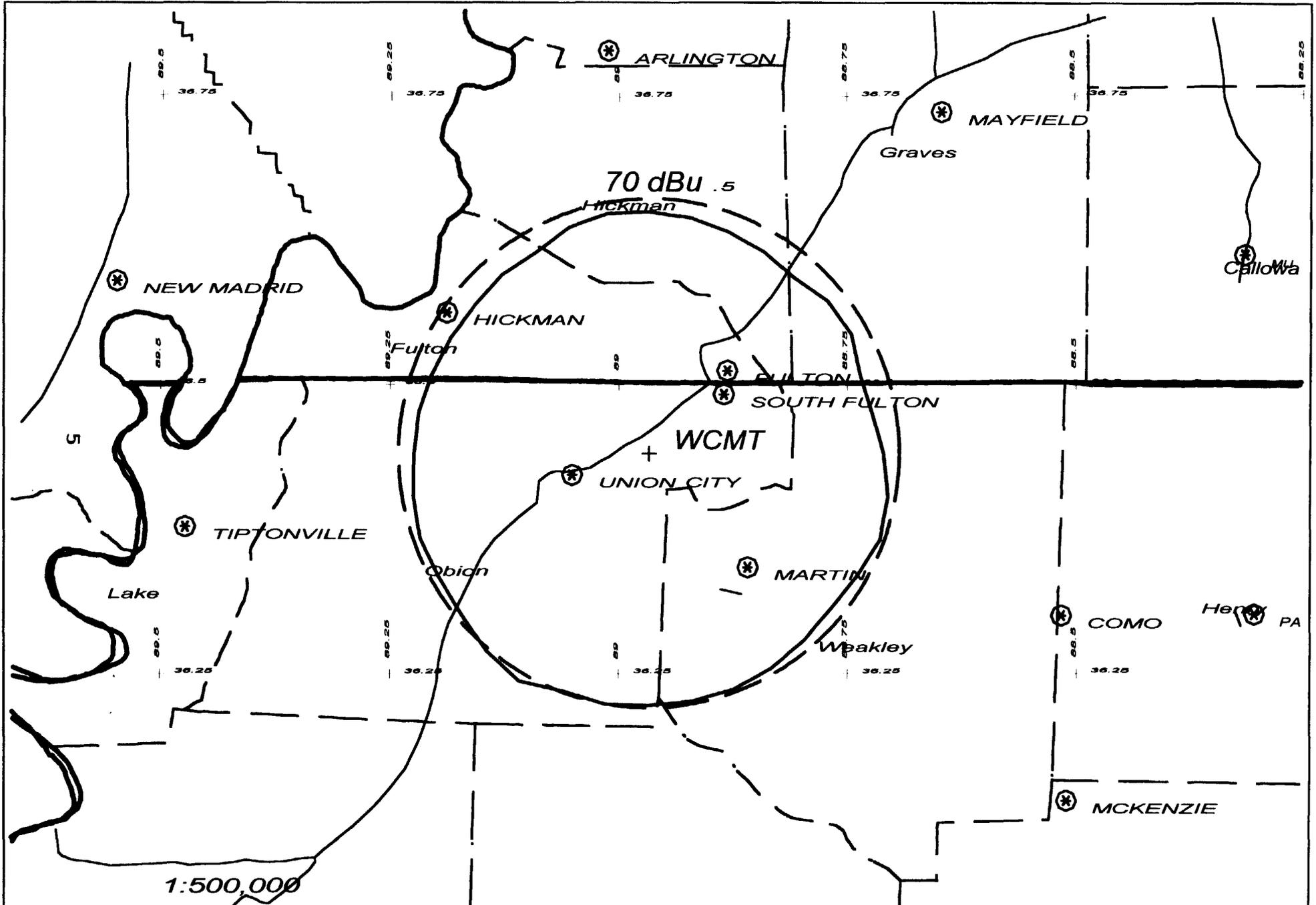


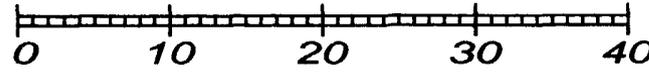
EXHIBIT E-1

Call	CH#	Location		D-KM	Azi	FCC	Margin
AD267	267C3	Tiptonville	TN	39.85	251.8	152.5	-112.65
ALOPEN	267C3	Tiptonville	TN	46.13	261.5	152.5	-106.37
WCMTFM	269A	Martin	TN	13.65	129.6	41.5	-27.85
AD267	267A	Princeton	KY	120.69	48.0	141.5	-20.81
ALOPEN	268C1	Carbondale	IL	143.66	335.6	143.5	0.16
WCILFM	268B	Carbondale	IL	144.87	349.9	144.5	0.37
WCILFM	268B	Carbondale	IL	144.87	349.9	144.5	0.37
WNWSFM	268A	Jackson	TN	89.54	168.6	88.5	1.04
WTPRFM	268A	Mckinnon	TN	89.58	91.8	88.5	1.08
WCILFM	268C1	Carbondale	IL	147.80	333.3	143.5	4.30
ALOPEN	267A	Sturgis	KY	150.81	35.0	141.5	9.31
KGMO	264C	Cape Girardeau	MO	114.85	334.3	95.5	19.35
ALOPEN	265C3	Huntingdon	TN	66.96	137.1	42.5	24.46
KJMS	266C1	Memphis	TN	170.68	212.0	143.5	27.18
WVHR.A	265C3	Huntingdon	TN	70.70	140.1	42.5	28.20
ALOPEN	265C3	Huntingdon	TN	71.55	127.2	42.5	29.05
WVHR	265A	Huntingdon	TN	70.70	140.1	41.5	29.20
KJMS	266C1	Memphis	TN	177.26	215.3	143.5	33.76
WKNQ	214C1	Dyersburg	TN	60.11	231.1	23.5	36.61
WJZC	266C1	Russellville	KY	204.48	86.6	143.5	60.98
WVHM	213C3	Benton	KY	77.97	58.1	13.5	64.47
KIYS	270C	Jonesboro	AR	164.55	251.3	95.5	69.05



1:500,000

Scale in km



WCMT 267C3 25kW 211.65M AMSL
 N. Lat. 36 26 27 W. Lng. 88 58 00

E-2 - WCMT
 CM ANDERSON - 07/9

EXHIBIT E-3

REFERENCE
 36 22 42 N
 89 28 30 W

CLASS = A
 Current Spacings

DISPLAY DATES
 DATA 07-10-99
 SEARCH 07-10-99

----- Channel 247 - 97.3 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WHRK	LI 246C1	Memphis	TN	138.06	201.9	133.0	5.06
KBGJ.C	CPM 247A	Marble Hill	MO	123.59	334.4	115.0	8.59
DE247	DE 247A	Marble Hill	MO	123.71	334.3	115.0	8.71
KBXB	LI 250C2	Sikeston	MO	70.45	347.4	55.0	15.45
KOEA	LI 248C2	Doniphan	MO	122.72	281.4	106.0	16.72
WWEZ	LI 249C3	Trenton	TN	60.20	122.5	42.0	18.20
WKJQFM	LI 247A	Parsons	TN	145.95	122.8	115.0	30.95
WDDJ	LI 245C1	Paducah	KY	107.00	45.6	75.0	32.00
WRUL	LI 247B	Carmi	IL	220.26	30.4	178.0	42.26
ALOPEN	AL 247A	Arcadia	MO	168.87	322.8	115.0	53.87
KAHR	LI 244A	Poplar Bluff	MO	99.82	296.0	31.0	68.82

EXHIBIT E-4

REFERENCE
36 05 10 N
88 54 39 W

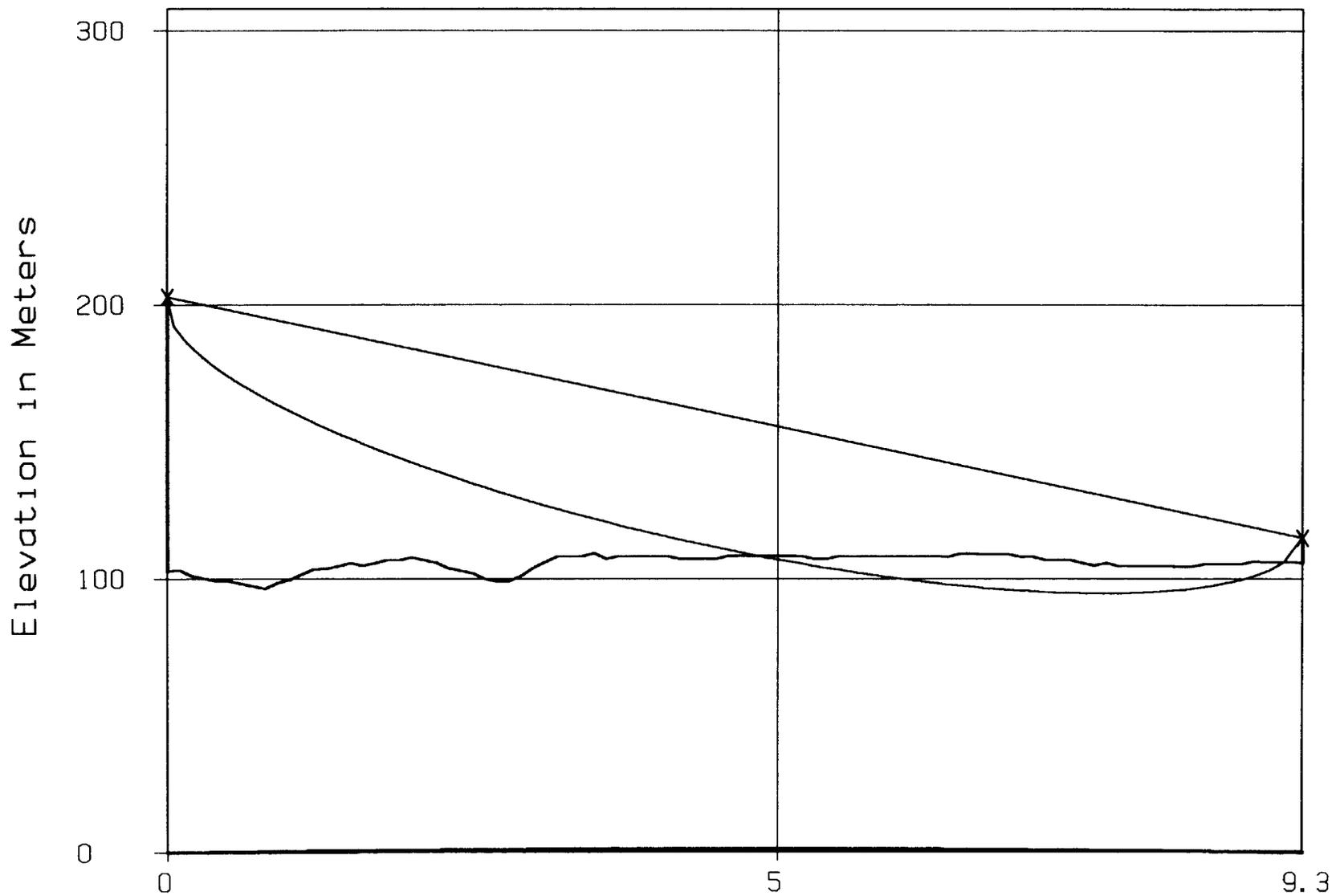
CLASS = C3
Current Spacings

DISPLAY DATES
DATA 07-10-99
SEARCH 07-10-99

----- Channel 249 - 97.7 MHz -----

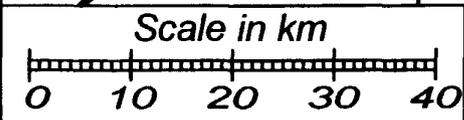
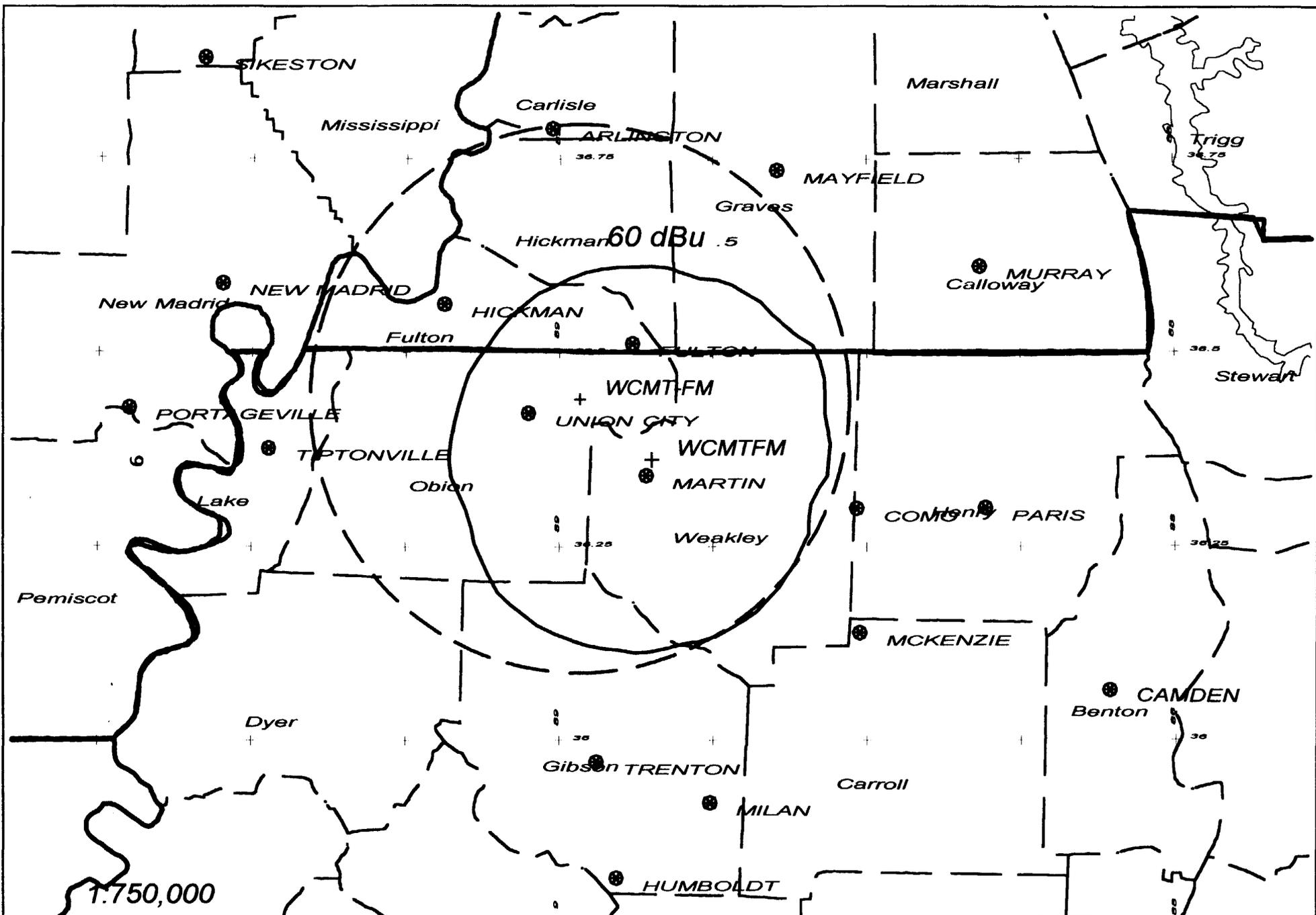
Call	Channel	Location		Dist	Azi	FCC	Margin
WWEZ	LI 249C3	Trenton	TN	0.00	0.0	153.0	-153.00
AD249	AD 249A	Bethel Springs	TN	92.72	163.7	142.0	-49.28
KBXB	LI 250C2	Sikeston	MO	120.78	327.2	117.0	3.78
WRIKFM	CPM 252C1	Metropolis	IL	82.64	26.3	76.0	6.64
WSIXFM	LI 250C	Nashville	TN	187.49	90.7	176.0	11.49
WRJB	LI 252A	Camden	TN	72.87	92.3	42.0	30.87
WQUL	LI 249A	West Frankfort	IL	185.12	359.4	142.0	43.12
WKJQFM	LI 247A	Parsons	TN	85.75	123.3	42.0	43.75
WHRZ	LI 249A	Providence	KY	189.74	38.5	142.0	47.74
WSRRFM	LI 251C1	Millington	TN	131.86	220.1	76.0	55.86
WSRRFM	CP 251C1	Millington	TN	132.30	218.8	76.0	56.30
WSRRFM	CPM 251C1	Millington	TN	132.30	218.8	76.0	56.30
WKGL	LI 249A	Russellville	AL	199.68	145.7	142.0	57.68
ALOPEN	AL 248A	Hopkinsville	KY	149.59	58.9	89.0	60.59
AP248	AP 248A	Hopkinsville	KY	151.57	59.8	89.0	62.57
AP248	AP 248A	Hopkinsville	KY	151.59	57.4	89.0	62.59
KOEA	LI 248C2	Doniphan	MO	180.21	288.7	117.0	63.21
AP248	AP 248A	Hopkinsville	KY	153.18	60.2	89.0	64.18
WHRK	LI 246C1	Memphis	TN	140.26	227.1	76.0	64.26
AP248	AP 248A	Hopkinsville	KY	155.09	59.6	89.0	66.09
WWMS	LI 248C1	Oxford	MS	213.96	186.0	144.0	69.96
KABKFM	LI 249C2	Augusta	AR	249.09	252.4	177.0	72.09

TERRAIN PROFILE AT 52.0 DEGREES T.
EXHIBIT E-5



8

Xmtr. AMSL = 203	Distance in km	Rcvr. AMSL = 115
Xmtr. AG = 100	K = 1.33	Rcvr. AG = 9
Transmitter Site coordinates	N. Lat. = 36 26 27	W. Lng. = 88 58 00



WCMTFM 269A 6kW 210M AMSL
N. Lat. 36 21 45 W. Lng. 88 50 57

E-6 - WCMT
CM ANDERSON - 07/99

E-7

REFERENCE

36 25 56 N
89 28 38 W

CLASS = C3

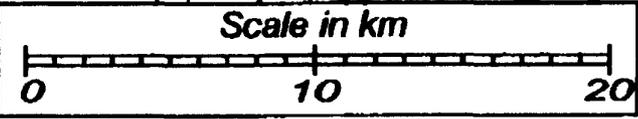
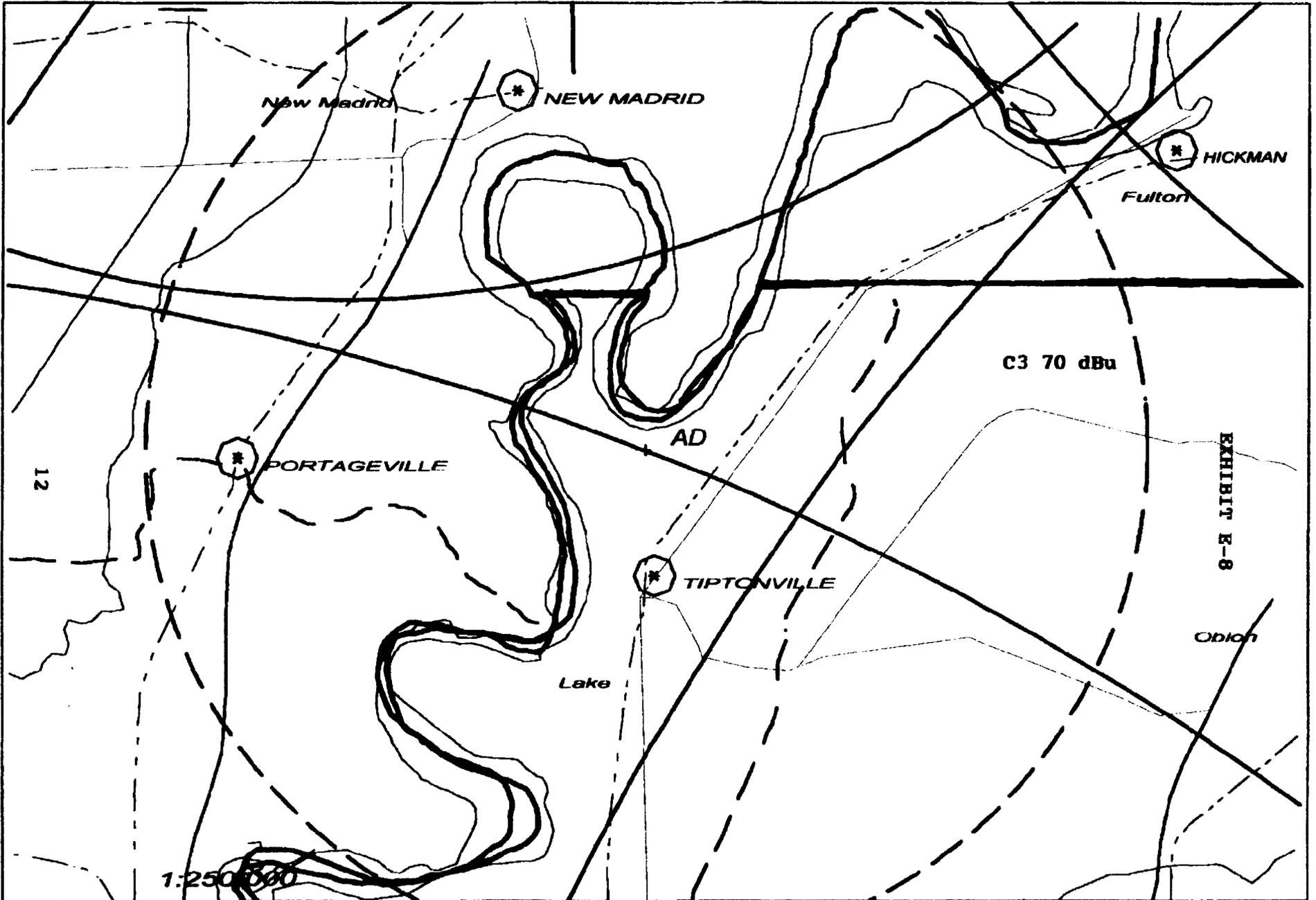
Current Spacings

DISPLAY DATES

DATA 07-10-99
SEARCH 07-11-99

----- Channel 247 - 97.3 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
WHRK	LI 246C1	Memphis TN	143.56	200.9	143.5	0.06
WRUL	LI 247B	Carmi IL	215.23	31.2	210.5	4.73
KOEA	LI 248C2	Doniphan MO	121.49	278.7	116.5	4.99
WKJQFM	LI 247A	Parsons TN	149.42	124.7	141.5	7.92
KBXB	LI 250C2	Sikeston MO	64.58	346.5	55.5	9.08
WWEZ	LI 249C3	Trenton TN	63.76	127.0	42.5	21.26
ALOPEN	AL 247A	Arcadia MO	164.03	321.6	141.5	22.53
WDDJ	LI 245C1	Paducah KY	103.06	48.0	75.5	27.56
KAHR	LI 244A	Poplar Bluff MO	97.18	292.8	41.5	55.68



247C3 0kW 0M AMSL
N. Lat. 36 25 56 W. Lng. 89 28 38

TIPTONVILLE 247C3
CM ANDERSON - 07/9

E-9

REFERENCE
37 22 49 N
90 04 49 W

CLASS = A
Current Spacings

DISPLAY DATES
DATA 07-10-99
SEARCH 07-11-99

----- Channel 228 - 93.5 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
KBGJ.C	CPM 228A	Marble Hill	MO	0.00	0.0	114.5	-114.50
AD228	AD 228A	Marble Hill	MO	0.20	278.8	114.5	-114.30
KGKS.C	CP 230C3	Scott City	MO	41.51	93.4	41.5	0.01
KSD	LI 229C1	St. Louis	MO	133.68	350.6	132.5	1.18
KBDZ	LI 226A	Perryville	MO	32.32	22.6	30.5	1.82
WKYQ	LI 227C1	Paducah	KY	135.21	105.4	132.5	2.71
KBKG	LI 228A	Corning	AR	117.71	202.5	114.5	3.21
KMHM	LI 281A	Lutesville	MO	12.92	91.2	9.5	3.42
KNSX	LI 227C2	Steelville	MO	116.79	313.9	105.5	11.29
KGKS	LI 230A	Scott City	MO	43.20	91.6	30.5	12.70
KYLSFM	LI 225A	Ironton	MO	58.27	291.8	30.5	27.77
KMAL.C	CP 225C2	Malden	MO	82.91	160.7	54.5	28.41
KMAL.C	CP 225C3	Malden	MO	92.34	174.4	41.5	50.84
KDBB.C	CP 282A	Bonne Terre	MO	63.17	317.8	9.5	53.67
KDBB	LI 282A	Bonne Terre	MO	63.19	317.9	9.5	53.69
KRMSFM	CP 228C2	Osage Beach	MO	238.73	292.2	165.5	73.23
KRMSFM	AP 228C2	Osage Beach	MO	238.73	292.2	165.5	73.23

E-10

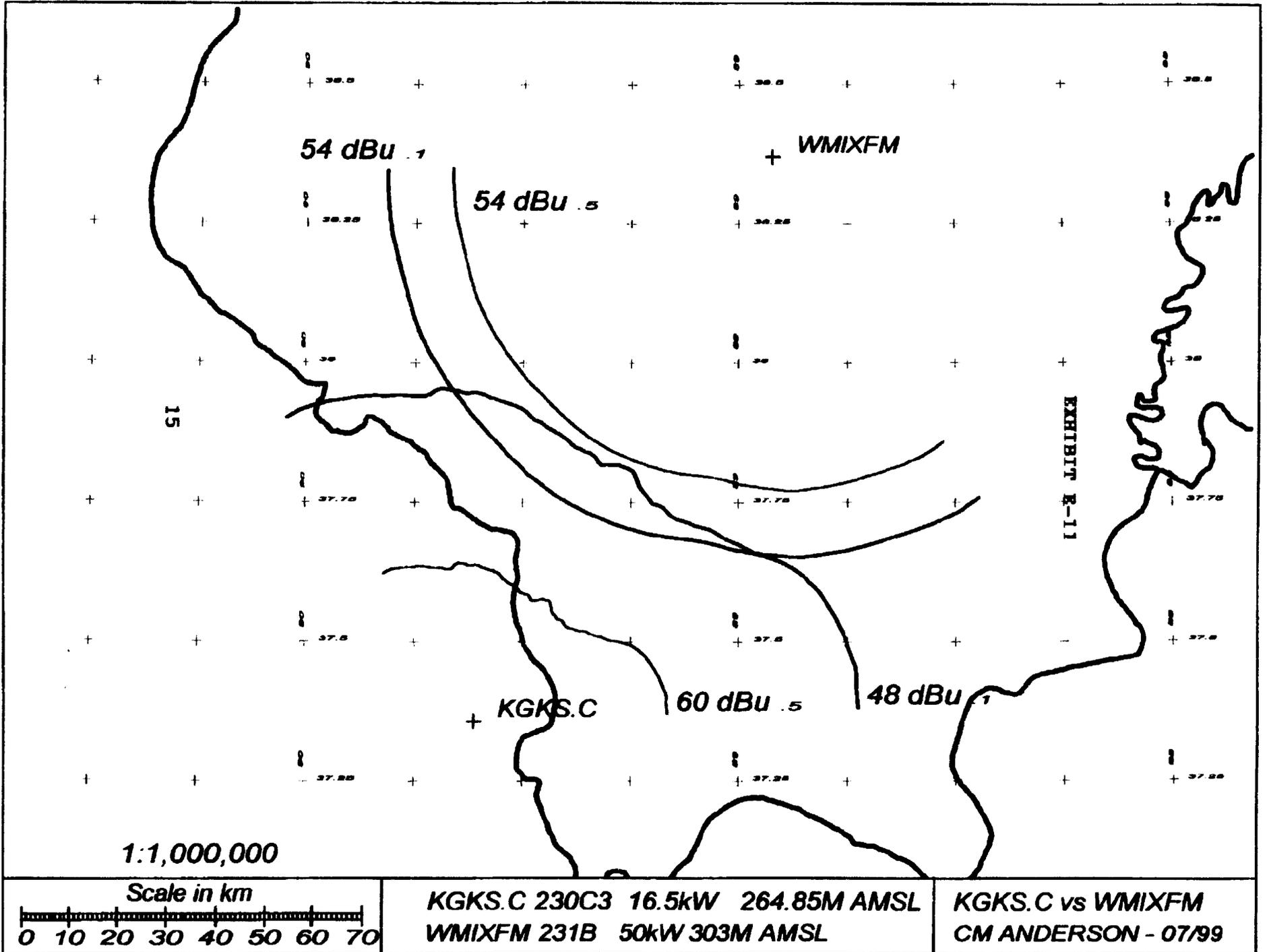
REFERENCE
37 21 27 N
89 36 45 W

CLASS = C3
Current Spacings

DISPLAY DATES
DATA 07-10-99
SEARCH 07-11-99

----- Channel 230 - 93.9 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
KGKS.C CP	230C3	Scott City	MO	0.79	285.9	153.0	-152.21
KGKS	LI 230A	Scott City	MO	2.14	54.7	142.0	-139.86
WMIXFM	LI 231B	Mount Vernon	IL	127.80	28.1	145.0	-17.20
KSPQ	LI 230C1	West Plains	MO	207.49	259.7	211.0	-3.51
KBGJ.C CPM	228A	Marble Hill	MO	41.51	273.6	42.0	-0.49
AD228	AD 228A	Marble Hill	MO	41.71	273.7	42.0	-0.29
KSD	LI 229C1	St. Louis	MO	148.50	335.1	144.0	4.50
KYRX	LI 284A	Chaffee	MO	22.20	178.4	12.0	10.20
KYRX.C CP	284C3	Chaffee	MO	24.64	151.6	14.0	10.64
WKYQ	LI 227C1	Paducah	KY	94.99	110.9	76.0	18.99
WKTG	LI 230C2	Madisonville	KY	196.40	83.9	177.0	19.40
KAMJ	LI 230A	Gosnell	AR	163.62	188.5	142.0	21.62
KKLR	LI 233C1	Poplar Bluff	MO	98.47	228.0	76.0	22.47
WDXRFM	LI 232A	Golconda	IL	99.88	97.6	42.0	57.88
WLZK	LI 231C3	Paris	TN	165.16	134.3	99.0	66.16



CERTIFICATION

Charles M. Anderson hereby certifies that;

His qualifications in broadcast allocation matters are a matter of record before the Federal Communications Commission having been presented and accepted on many occasions in the past;

That he holds a lifetime General Radiotelephone license (#PG-6-7352) , a bachelors degree in the physical sciences from Western Kentucky University, and advanced degrees from the University of North Carolina and Indiana University;

That he developed the accompanying technical report and exhibits personally or under his immediate supervision and that all the information presented therein is true and correct to the best of his knowledge and belief.

Charles M. Anderson
/s/ _____
Charles M. Anderson

July 11, 1999

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The following information has been provided to Thunderbolt Broadcasting by the South Fulton, Tennessee City Manager, Mr. David Bell.

South Fulton, Tennessee is a city with a population of 2,688 and the approximate number of families is 1,182. South Fulton Tennessee operates under a city charter with a mayor and four alderman board of government and city manager. The city budget is approximately \$2.3 million dollars and the city operates with a full time police department, full time fire department, full time public works department and cooperative ambulance service.

There are seven thriving industries in South Fulton including Stanley Jones Corporation, W.S.W. manufacturing, Waymatic, Jiffy Steamer, Thomas Plating, Martin Tool and Die and Liggett Manufacturing. Complimenting its industry are numerous retail businesses, bank, mortgage company and numerous churches.

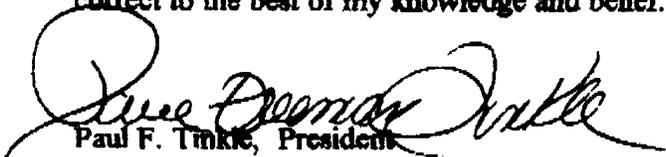
South Fulton has three schools including South Fulton Elementary (K-6 enrollment 538 students), South Fulton Middle School (7-8th grades enrollment 140 students) and South Fulton High School (9-12th grades enrollment 294 students) Total schools enrollment is 972 students. There are three health care facilities in South Fulton including the Baptist Clinic, Parkway Regional Hospital and Yates Pediatric Clinic.

The Tennessee State Department of Economic and Community Development has recognized South Fulton as a consistent "Three Star Award" winning city 13 times citing South Fulton's readiness for economical and industrial growth. The award is presented by the Governor of Tennessee.

South Fulton is also a major infrastructure hub for United States Highways 51 and 45 and the Kentucky Purchase Parkway. South Fulton is located on the proposed interstate 69 route.

The City of South Fulton shares its post office with the City of Fulton but has its own separate zip code. The zip code for South Fulton, Tennessee 38257.

I here by declare and attest under penalty of perjury the above information is true and correct to the best of my knowledge and belief.


Paul F. Tinkle, President

Thunderbolt Broadcasting Company

The following information was provided to Thunderbolt Broadcasting by Mayor Kay Cox, Mayor of Bethel Springs, Tennessee

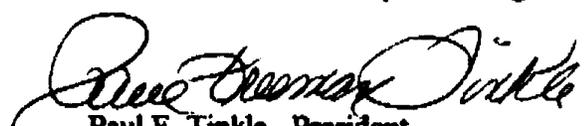
Bethel Springs is a town with a population of 755 and approximately 348 families. The town of Bethel Springs operates under a mayor and board of alderman charter with a full time city recorder. The town has one police officer and a volunteer fire department. The town has no sewer program. Bethel Springs has 3 industries, Hickman's Cabinet Shop, Them's Fine Apparel and Midwest Woodworking. This city budget is approximately \$125,000.

There is one school in the town of Bethel Springs; Bethel Springs Elementary school. The total number of students enrolled is 437 students in kindergarten-8th grade.

The town has no medical facilities in the town of Bethel Springs.

Bethel Springs is located off US Highway 45 bypass on Main Street. The town has one post office. The zip code is 38315.

I here by declare and attest under penalty of perjury the above information is true and correct to the best of my knowledge and belief.


Paul F. Tinkle, President
Thunderbolt Broadcasting Company

CERTIFICATE OF SERVICE

I, Lisa Skoritoski, a secretary in the law firm of Pepper & Corazzini, L.L.P., certify that the foregoing Comments and Counterproposals were mailed on this 12th day of July, 1999 to the following by first class mail, postage prepaid:

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Mass Media Bureau
Federal Communications Commission
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Washington, D.C. 20554

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c/o Jimmy D. Brown
3668 Kimball Avenue
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Arlington, VA 22209
(Counsel to Zimmer Radio of Mid-Missouri, Inc.)

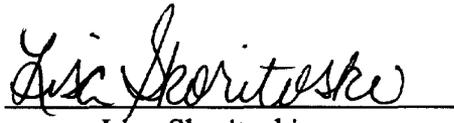
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* via hand delivery


Lisa Skoritoski