

Before the
Federal Communications Commission
Washington, DC 20554

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In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations.)
)
(Cloverdale and Cazadero, CA))

MM Docket No. 99-180
RM-9583

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JUL 12 1999

To: Mass Media Bureau (Policy & Rules)

COUNTERPROPOSAL

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Point Broadcasting ("Point"), by its attorney, respectfully submits this counterproposal in the above-captioned proceeding. In its Notice of proposed Rule Making ("NPRM"), the Commission proposed to allot Channel 274A to Cloverdale, California, as its first local service. However, Point submits that the public interest is better served by its allotment to Cazadero, and proposes the allotment to that community in lieu of its allotment to Cloverdale.

While Cazadero, in Sonoma County, is not incorporated, it is a viable community in need of its own broadcast service. As a result of its remote location, it receives very limited radio service. Its population is approximately 1,500 and it is home to a number of businesses and organizations, some of whom identify with Cazadero in their names.

Within Cazadero are the Cazadero General Store; the Cazadero Supply, a hardware and auto supply store; Cazadero Lodge with both dining and lodging; Fern Falls, offering unique accommodations; Elm Grove restaurant and Cabins; Flowers Vineyard and Winery. Cazadero residents worship at the St. Coleman's Catholic Church and the Cazadero Community Church. Young residents attend the Montgomery

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Elementary School, approximately 100 students in grades K-8, or the Cazacademy, a private alternative high school with approximately 30 students. Other points of interest in Cazadero include the Timber Hill Ranch; the Kruse Rhododendron State Reserve; the UCC Camp Cazadero; the Baptist camp; Camp Royaneh, a Boy Scout camp; and the Cazadero Performing Arts Camp.

Channel 274A will provide a city-grade signal over all of Cazadero and meet all Commission spacing requirements from a transmitter site located at 38° 34' 40"; 123° 09' 30". Attached hereto is a spacing study for Channel 274A at that location.

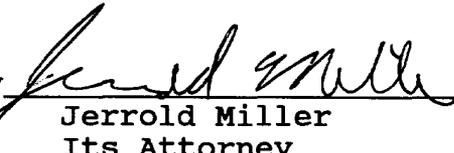
Point commits to apply for Channel 274A at Cazadero, California, upon the opening of a filing window, and, if authorized, to construct the new station promptly.

While Cloverdale (population 4,924 according to the 1990 Census) is a more populous community than Cazadero, Point is today filing a petition for rule making to move its construction permit from Point Arena to Cloverdale. Thus, adopting Point's counter-proposal will not leave Cloverdale without a local broadcast service. Allotting Channel 274A to Cazadero will result in both Cazadero and Cloverdale having local transmission services, while allotting Channel 274A to Cloverdale will result in Cloverdale having two transmission services with none for Cazadero.

Accordingly, the Commission should amend Section 73.202(b) to allot Channel 274A to Cazadero, California.

Respectfully Submitted,

POINT BROADCASTING

By 

Jerrold Miller
Its Attorney

July 12, 1999

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MAPFM search of channel 274A6 (102.7 MHz), at N. 38 34 40, W. 123 9 30.

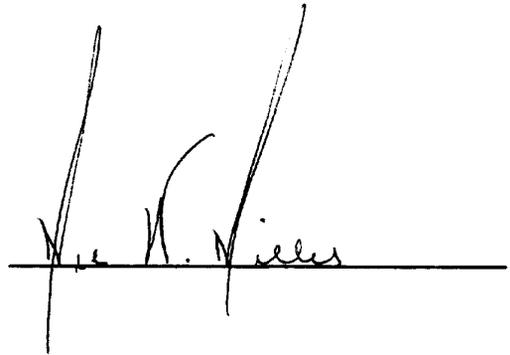
Searching Channel 274A6 (102.7 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEFN	BRNG
CLEARANCE								
KLVR	Santa Rosa	CA	220	B	L	47.0	15.0	77.5 0 32.0
ALC	San Francisco	CA	271	B	U	99.4	69.0	144.5 0 30.4
KDFCFM	San Francisco	CA	271	B	L	99.3	69.0	144.3 0 30.3
ALC	Point Arena	CA	272	B1	V	59.2	48.0	308.7 0 11.2
NEW	Point Arena	CA	272	B1	A	48.6	48.0	316.5 0 0.6
ALC	Woodland	CA	273	B	U	124.9	113.0	89.4 0 11.9
KSEFM	Woodland	CA	273	B	L	124.9	113.0	89.4 0 11.9
KSEFM	Woodland	CA	273	B	L	124.9	113.0	89.4 0 11.9
FR	Cloverdale	CA	274	A	A	22.2	115.0	35.9 0 -92.8
NEW-T	Rio Nido	CA	274	D	A	17.7	0.0	103.7 0 17.7
NEW-T	Cazadero	CA	274	D	A	0.0	0.0	0.0 0 0.0
ALC	Berkeley	CA	275	B	U	117.3	113.0	147.3 0 4.3
KBLXFM	Berkeley	CA	275	B	L	117.3	113.0	147.3 0 4.3
KBLXFM	Berkeley	CA	275	B	L	117.3	113.0	147.3 0 4.3
ALC	Ukiah	CA	277	B	U	83.7	69.0	353.4 0 14.7
KUKIFM	Ukiah	CA	277	B	L	83.7	69.0	353.4 0 14.7

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of July , 1999 , a copy of the foregoing document was placed in the United States mail, first class postage prepaid, addressed to the following:

Victor A. Michael , Jr.
Mountain West Broadcasting
6807 Foxglove Drive
Cheyenne, WY 82009



Victor A. Michael