

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

In re Applications of)	MM Docket No. 99-153
)	
READING BROADCASTING, INC.)	File No. BRCT-940407KF
)	
For Renewal of License of)	
Station WTVE(TV), Channel 51)	
Reading, Pennsylvania)	
)	
and)	
)	
ADAMS COMMUNICATIONS)	
CORPORATION)	File No. BPCT-940630KG
)	
For Construction Permit for a New)	
Television Station to Operate on)	
Channel 51, Reading, Pennsylvania)	

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Magalie Roman Salas, Secretary
for direction to
The Honorable Richard L. Sippel
Administrative Law Judge

THRESHOLD SHOWING OF UNUSUALLY POOR BROADCAST RECORD

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September 3, 1999

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1. Adams Communications Corporation ("Adams") hereby submits its Threshold Showing of Unusually Poor Broadcast Record with respect to Reading Broadcasting, Inc. ("RBI").^{1/} As set forth below, it is well established that RBI's dominant principal, Micheal Parker, has "fail[ed] to carry out representations made to the Commission" with respect to other matters in which he has been involved before the Commission. Such failure is an expressly-stated basis for a "threshold showing" such as this. *See, e.g., Memorandum Opinion and Order*, FCC 99M-47, released August 9, 1999, ¶9, citing *Policy Statement on Comparative Broadcast Hearings ("Policy Statement")*, 1 FCC2d 393, 398 (1965). Similarly, Parker's operation of other stations he controls raises questions concerning whether his stations in fact "meet the public's needs and interests", a second expressly-stated basis for such a showing. *Policy Statement, supra*. And finally, available evidence indicates that, because of Parker's role in RBI, Thomas Root, a convicted felon who has been disbarred from practice before the Commission, may be in a position to influence the operations of Station WTVE(TV). Such involvement can be considered by the Commission in determining whether license renewal is warranted. *See The Petroleum V. Nasby Corporation*, 8 FCC Rcd 4035, 4036, ¶7 (1993).

Parker's Previously-Adjudicated Misconduct

2. As Adams has advised the Presiding Judge in a Motion to Enlarge Issues herein, Parker has at least twice been found to have engaged in fraudulent or deceitful conduct before the Commission. *See Mt. Baker Broadcasting Co., Inc.*, 3 FCC Rcd 4777

^{1/} This Threshold Showing, which seeks leave to present evidence of the past broadcast record of RBI principal Micheal Parker, is being submitted pursuant to the Presiding Judge's *Memorandum Opinion and Order*, FCC 99M-47, released August 9, 1999, ¶9 and n. 9. The deadline for such showings as specified by the Presiding Judge was September 3, 1999.

(1988); *Religious Broadcasting Network*, 2 FCC Rcd 6561, 6566-67 (ALJ 1987), *aff'd*, 3 FCC Rcd 4085, 4090 (Rev. Bd. 1988). *See also Doylan Forney*, 3 FCC Rcd 6330, 6338, n. 1 (Rev. Bd. 1988). RBI has acknowledged Parker's misconduct. *See* RBI Opposition to Adams's Motion to Enlarge Issues. RBI has not claimed that Parker has in any way been rehabilitated since his misconduct; rather, RBI has attempted to argue simply that RBI should not be deemed to be disqualified because of Parker's misconduct. ^{2/}

3. Adams has responded that a basic disqualifying issue can and should be added against RBI in light of the *Mt. Baker* and *Religious Broadcasting* decisions. But regardless of whether any such disqualifying issue is added, it is clear that Parker's conceded misconduct can and must also be considered in the context of the comparative issue. As the Presiding Judge himself has observed, the "unusually poor broadcast record" component of that issue specifically mandates consideration of previously-demonstrated unreliability with respect to statements made to the Commission. Here, Parker has twice been found to have engaged in fraud or deceit before the Commission. It is difficult to imagine any more conclusive demonstration of unreliability than repeated instances of fraud and deceit before this very agency.

4. Adams emphasizes that this Threshold Showing is offered separately and

^{2/} RBI has claimed that Parker's misconduct in *Mt. Baker* and *Religious Broadcasting* is too old to support addition of a basic qualifying issue. While Adams does not agree with RBI's "statute of limitations" argument, Adams notes that, in any event, no such argument is available in the context of an "unusually poor broadcast record" showing, since the *Policy Statement* imposes no time limitations at all in that particular regard.

In its Opposition to Adams's Motion to Enlarge Issues, RBI has also claimed that, in *Religious Broadcasting*, Parker was not really held to be disqualified because of his misconduct there. Again, Adams does not agree with that self-serving reading of the Review Board's decision in *Religious Broadcasting*, but in the context of the instant Threshold Showing that point is immaterial: RBI does acknowledge that, whatever its effect on the applicant there happened to be, the misconduct described in *Religious Broadcasting* *did* occur.

independently of Adams's Motion to Enlarge Issues. Adams continues to believe, as set forth in that Motion, that the previous adjudications concerning Parker can and should be considered herein with respect to RBI's basic qualifications. This Threshold Showing relates to the already-designated comparative issue, and affords a parallel justification for consideration of these matters in this hearing.^{3/}

Parker's Past Performance at Other Stations

Station KORC(TV), Anacortes, Washington

5. An "unusually poor broadcast record" showing may also include information concerning the extent to which the applicant's historical operation of stations indicates that the applicant will not meet the public's needs and interests. *See Policy Statement*. Parker's record of operation raises precisely such concerns.

6. First and most obviously, in *Mt. Baker* the Commission entrusted to Parker^{4/} a permit to operate Station KORC(TV), a full-service television station in Anacortes, Washington. Despite Parker's claim that that station would commence operation "around the

^{3/} In its Motion to Enlarge Issues, Adams has sought addition of a second issue relating to the less than candid manner in which Parker has, in applications filed subsequent to *Mt. Baker* and *Religious Broadcasting*, failed to disclose the nature and extent of the misconduct identified in those decisions. That second requested issue is also separate and independent from this Threshold Showing, which relates to the already-designated comparative issue. Of course, if Adams's second requested issue were to be added herein, and if the evidence adduced thereunder established further misrepresentations or lack of candor by Parker, such additional misconduct could and should be considered in the context of his "unusually poor broadcast record" as well, even if that misconduct were not deemed to be disqualifying.

^{4/} The permittee was Mt. Baker Broadcasting Company, Inc. ("Mt. Baker"). According to Parker, he was the "corporate president and the largest stockholder, and had been authorized by the Board of Directors to carry out all of the functions, both corporate and day-to-day business" of Mt. Baker. *See* Tr. 3703 in MM Docket No. 83-911 (copy included as Attachment A). Parker also stated that he had "made a commitment to become general manager of Mt. Baker". Tr. 3858 in MM Docket No. 83-911 (copy included as Attachment B).

1st of October" in 1985 (*see* Attachment B), by early December, 1986 -- 14 months later -- operation had still not begun. Accordingly, the Commission cancelled the permit.

7. Less than a month later Mt. Baker sought reconsideration, claiming that the station had been constructed in December, 1986 and was ready to commence operation. On the basis of that representation, the Commission reinstated the permit in January, 1987, subject to the condition that a license application be filed within ten days. Months passed with no such filing. In April, 1987, the Field Operation Bureau inspected the station and found that Mt. Baker had in fact constructed the equivalent of a television translator facility, *not* the full service station which had been authorized. The station which had been built included: a different antenna than that specified in the permit; a tower which was less than one-quarter the height authorized by the permit - 100 feet above ground level built, as opposed to 403 feet AGL authorized; and an effective radiated power less than three-tenths of one percent (approximately 0.28%) of the authorized ERP - 10.3 kW installed, 3,630 kW authorized. 3 FCC Rcd at 4777.

8. Obviously, that construction cannot be said to reflect any serious intent to provide meaningful service to the intended audience, since those facilities could not even reach a substantial portion of the intended audience.

9. Further, in its dealings with the Commission Mt. Baker appears to have been using as a hostage the public's interest in receiving service from the station. After the permit had been cancelled a second time, Mt. Baker again sought reinstatement, arguing, *inter alia*, that cancellation of the permit would render the channel unusable for the public because of the "freeze" (*see Advanced Television Systems and Their Impact on the Existing Television Broadcast Service*, Mimeo No. 4074, RM-5811 (released July 17, 1987)) on new television

applications in certain markets. Mt. Baker thus seemed to be trying to convince the Commission that permitting Mt. Baker's sub-standard, misrepresentative operation would be better than nothing at all for the Anacortes audience. The Commission declined to allow the public interest to be so used; the Commission denied the requested reinstatement. *Mt. Baker Broadcasting Company, Inc.*, 3 FCC Rcd 4777, 4778 (1988).

Station KVMD(TV), Twentynine Palms, California

10. Parker is also the sole shareholder of Desert 31 Television, Inc., the licensee of Station KVMD(TV), Twentynine Palms, California. Parker acquired that interest from Joseph Shackelford pursuant to Commission approval in File No. BTCCT-920603KG. At the time, the station had not been constructed. A license application was filed in 1996. According to a website entitled "World-Wide Radio & Television Stations Carrying Dr. Gene Scott's Programs on the *University Network*" (<http://207/155/78/66/dg00001.htm>), that station has the distinction of being the only full service U.S. television station transmitting the programming of Dr. Gene Scott "7 days a week, 24 hours a day!" See Attachment C.^{5/} Adams has obtained from Station KVMD(TV) copies of programming logs which confirm that, to the limited extent that the station does in fact broadcast^{6/}, its programming consists nearly exclusively of Scott's University Network material. See Attachment D.

^{5/} Dr. Gene Scott was the central figure in *Faith Center, Inc.*, a former licensee whose problematic history is preliminarily summarized in *Faith Center, Inc.*, 45 RR2d 709 (1980). Faith Center's license renewal applications were designated for hearing in the late 1970s because of questions which the Commission had concerning certain aspects of the Faith Center/Scott programming and activities. *Id.* Faith Center's efforts to retain its licenses were unsuccessful. *Id.* Curiously, the name of Joseph Shackelford -- the individual from whom Parker acquired Station KVMD(TV) -- was mentioned in the Faith Center decision as a witness potentially knowledgeable about Scott. See *Faith Center, Inc.*, *supra* at ¶73.

^{6/} The station's logs indicate that the station generally operates only approximately eight hours per day or less.

11. Indeed, of the ten full service U.S. television stations which, according to that website, broadcast *any* such programming, three are presently controlled, directly or indirectly, by Parker: KVMD(TV) and WTVE(TV) (where Parker is the dominant principal of the respective licensees), and WHCT(TV), Hartford (with respect to which Parker has a time brokerage agreement).

Station KAIJ, Dallas, Texas

12. Additionally, Parker (through Two If By Sea Broadcasting Corporation ("TIBS"), of which Parker is the sole shareholder) is the licensee of International Broadcast Station KAIJ, Dallas. According to the website listing, KAIJ is one of only two such stations in the country which provide such programming "24 hours a day - 7 days a week". ^{7/} See Attachment D.

13. Parker's past performance as licensee of other stations -- including his unusual choices of programming on some of those stations -- raises questions as to whether the public will be served by renewal of license of Station WTVE(TV).

^{7/} Parker's acquisition of Station KAIJ is also interesting. That station was originally licensed to Criswell Center for Biblical Studies which, in 1990, proposed to sell the station to one Christine E. Shaw (File No. BALIB-901113ME). In June, 1991, the Commission sent Shaw a letter of inquiry in which it described questions the Commission had "concerning whether the application is really controlled by [Shaw] or by Dr. W. Eugene Scott (Dr. Scott) and/or organizations he controls." See excerpt of letter included as Attachment E. In a Petition for Special Relief filed on December 11, 1991, Shaw objected strenuously to the letter of inquiry. By letter dated July 29, 1992, Shaw requested the dismissal of her application. On that same day, she assigned her contractual right to acquire Station KAIJ to TIBS, Parker's corporation. Parker's application (File No. BALIB-920810OM) to acquire the station was filed two days before the Commission actually dismissed Shaw's application. Under Parker's control, the station is said to broadcast Scott programming on a full-time basis.

The Involvement of Tom Root with Station WTVE and Parker

14. In addition, there is the matter of Tom Root and his involvement with the operation of Station WTVE(TV) and Parker generally. Root is the former communications attorney who was indicted in the District of Columbia on 33 counts of fraudulent activity in connection with his practice before the Commission. *See, e.g., U.S. v. Root*, 12 F.3d 1116, 1117 (D.C. Cir. 1994). The charges included wire fraud, mail fraud and forgery; Root admitted "a host of fraudulent conduct . . . including forging the signatures of his clients and of administrative law judges, dismissing his clients' applications without their consent, lying to his clients, and drafting phony Federal Aviation Administration documents." *Id.* Root pled guilty to three counts of wire fraud. *Id.*^{8/}

15. Root was disbarred by both the District of Columbia Court of Appeals and the Commission. *See Thomas L. Root, Esquire*, 5 FCC Rcd 4038 (1990).

16. Adams has obtained evidence indicating that Root is currently involved in the operation of Station WTVE(TV) in some capacity. On August 9, 1999, counsel for RBI provided counsel for Adams with a statement, dated June 25, 1999 and signed by George Mattmiller, Assistant General Manager of Station WTVE(TV), listing various files which had been provided to an Adams representative. A copy of that statement is included as Attachment F. That statement includes a "c.c." notation reflecting that a copy of the statement was provided to "Tom Root".

17. Additionally, RBI has a website with the domain name of "WTVE.COM".

^{8/} In North Carolina, Root also pled no contest to 90 counts of selling unregistered securities, 90 counts of failing to register as a securities dealer, 180 counts of securities fraud, and four counts of conspiracy. In Florida, Root pled no contest to a 47-count superseding indictment including more than 20 fraud counts. *See The Petroleum V. Nasby Corporation*, 8 FCC Rcd 4035, 4035-36 (1993).

Domain names are assigned to "registrants" such as RBI by Network Solutions, Inc., which itself provides a website at which information concerning registrants may be reviewed.

According to that site, the "billing contact" for RBI (the registrant of "WTVE.COM") is "Tom Root". *See* Attachment G.

18. Thus, there are clear indications that Root is involved in the operation of Station WTVE(TV) -- why else would his name be included in these two documents?

19. Root's involvement with Station WTVE(TV) is not surprising because he has longstanding ties to Parker. Root served as Parker's personal counsel in the *Religious Broadcasting* proceeding. *See* Attachment H. In a comparative proceeding for a new television station in Avalon, California, Parker appeared as a consultant for Christine E. Shaw (*see* Footnote 7, above), who was represented by Root. Parker testified that he had been introduced to Shaw by Root. *See* Attachment I.

20. More recently, in 1998, a broker representing Parker's interests vis-à-vis Station WHCT(TV), Hartford, rejected an offer which had been made to the broker concerning that station.^{9/} The rejection letter showed a "cc" to "Tom Root, Esq." *See* Attachment J. And the records of the Hartford bankruptcy proceeding relative to Station WHCT(TV) also indicate that on February 10, 1997 -- less than a week after the implementation of a time brokerage agreement pursuant to which Parker acquired the right to program that station -- the station's chief engineer billed the licensee for 10 hours of time, during which he met with "T. Root" and the station's general manager; similar records reflect a two-hour meeting between the engineer and Root on May 13, 1997 and a one-hour

^{9/} Parker's corporation, TIBS, is the proposed assignee of Station WHCT(TV). The broker's letter states that the broker was "authorized, on behalf of TIBS Corp. and associated Principles [sic]" to make a counter-offer.

meeting on September 17, 1997. *See* Attachment K. Nor has Root's involvement at WHCT(TV) been short-lived. According to bills filed with the Bankruptcy Court by communications counsel for the WHCT(TV) licensee, on September 16, 1998 that counsel conferred with "JH" (whom Adams believes to be Joseph Hennessey, the general manager of WHCT(TV)) concerning "Root letter". *See* Attachment L. And on April 20, 1999, that counsel conferred with "JH" again "re root issues". *See* Attachment M.

21. This is not Root's first contact with Station WHCT(TV). In 1989 he represented an individual -- Lynnette Ellertson (File No. BPCT-890301KM) -- who filed an application (later dismissed) for that station's channel in 1989. Ellertson might seem irrelevant to the instant proceeding, but for the fact that the address listed for Ellertson in her 1989 Hartford application was 22720 S.E. 410th Street, Enumclaw, Washington -- which just happens to be the same address listed by Parker not only in a number of his applications, but also in RBI's August 9, 1999 response to Adams's interrogatories. *See* Attachments N-Q. The Commission's records also reveal that, in 1989, Ellertson was a shareholder and officer of West Coast United Broadcasting Co. ("West Coast United"), which was at the time the licensee of Station KWBB(TV), San Francisco. *See* Attachment O. At the same time Parker was an officer and director of West Coast United; an application filed with respect to Station KWBB(TV) in March, 1989 listed the same address for both Ellertson and Parker. *Id.*

22. It is clear that Root and Parker have had a longstanding relationship. The available evidence indicates that that relationship is alive and well today, and has placed Root in some position relative to the operation of Station WTVE(TV).

23. The Commission has made clear, with respect to Root, that his extensive misconduct can and should be considered "where [he] has the potential to influence or

control the operations of a station." *The Petroleum V. Nasby Corporation*, 8 FCC Rcd 4035, 4036 (1993). Under these circumstances, Adams submits that Root's apparent involvement in the operation of Station WTVE(TV) -- both by itself and also in conjunction with Root's longstanding and, apparently, continuing relationship with Parker -- raise serious questions about RBI's ultimate reliability. Root's misconduct rose to staggering heights, and included falsification of official documents and even the forging of ALJ signatures. To the extent that Root is currently, or has been, in a position to influence the operation of Station WTVE(TV), such involvement raises questions about that operation. All of these questions should be considered in the context of the "unusually poor broadcast record" component of the comparative issue herein.

WHEREFORE, for the reasons stated, Adams Communications Corporation submits that the comparative issue in this proceeding should be deemed to include the unusually poor broadcast record of RBI principal Micheal Parker as set forth above, so that evidence regarding that record (including, but not necessarily limited to evidence of the matters discussed in the foregoing Threshold Showing) may be presented in this proceeding.

Respectfully submitted,

/s/ 

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September 3, 1999

ATTACHMENT A

Excerpt (Volume 19, page 3703) of Transcript of Proceedings
in Religioug Broadcasting Network, MM Docket No. 83-911

198 1 to the matter which is ancillary to this proceeding, if you
2 will indicate that, we will suspend the -- we will not require
3 an answer to that question today, but will provide the
4 attorney the right to restate the question tomorrow and by
5 that time we will have decided whether in fact we should permit
6 it or not.

7 THE WITNESS: Thank you, Your Honor.

8 JUDGE GONZALES: If you will continue, then.

9 BY MR. ANDREWS:

10 Q Mr. Parker, perhaps it's been a long day and I may
11 have forgotten this. But you do consider yourself, or have
12 considered yourself as a management agent for Mount Baker,
13 isn't that correct?

14 A In the case of Mount Baker I am the president of
15 the corporation and the largest shareholder of an interest
16 in the application. I would think in that case that I've
17 been empowered by the Board of Directors to carry out all of
18 the functions, both corporate and day-to-day business, of
19 the Applicant.

20 That would include those activities that I would
21 generally associate with a managing agent.

22 Q But you have referred to yourself in Commission
23 documents as the managing agent of that application?

24 A As I stated, but it goes -- in Mount Baker's case
25 my authority goes beyond that of a managing agent to include

ATTACHMENT B

Excerpt (Volume 20, page 3858) of Transcript of Proceedings
in Religioug Broadcasting Network, MM Docket No. 83-911

1 A Well, there are really several reasons. The
2 first reason is that my financial advisors have advised me
3 that my consulting business is far more lucrative than the
4 ownership in these entities that I've undertaken, and that
5 I'm better to spend my time in the consulting business
6 rather than in ownership and operations.

7 Q What other reasons, if any, were there?

8 A Well, I've also made commitments from an
9 ownership standpoint that to fulfill those commitments will
10 really preclude any active involvement ownership-wise in any
11 other properties.

12 Specifically, I've made a commitment to become
13 general manager of Mt. Baker Broadcasting, KORC Television,
14 which will go on the air sometime around the 1st of
15 October.

16 Q You say Mt. Baker Broadcasting or KORC?

17 A The ownership of KORC is in the hands of
18 Mt. Baker Broadcasting.

19 Q So, that is the same project?

20 A Same project.

21 Q Now, there was testimony previously that you
22 had an ownership interest in TOTEM Broadcasting; do you
23 recall that?

24 A Yes, I do. That's correct.

25 Q Were any fees -- or what fees, if any, were ever

ATTACHMENT C

"World-Wide Radio & Television Stations
Carrying Dr. Gene Scott's Programs
on the *University Network*",
<http://207.155.78.66.dg00001.htm>
(downloaded August 26, 1999)

World-Wide Radio & Television Stations Carrying Dr. Gene Scott's Programs on the *University Network*

Below is a listing of the broadcast stations carrying "The University Network Presents Dr. Gene Scott." Times and frequencies given below are subject to change; call toll-free 1-800-338-3030 (in the USA) or 1-818-240-8151 collect from anywhere in the world for the latest time and frequency information.

• SATELLITES

24 HOURS A DAY - 7 DAYS A WEEK

- GENERAL ELECTRIC 3 Transponder 20 87° West
 - STATIONAR 11 Transponder 11 11° West
 - STATIONAR 21 Transponder 11 103° East
-

SHORT-WAVE RADIO

WWCR

Nashville, Tennessee - USA; **24 hours a day - 7 days a week!**

- 5935 KHz, from 7pm to 5am California Time (0200-1200 UTC)
 - 13845 KHz, from 5am to 7pm California Time (1200-0200 UTC)
-

KAIJ

Dallas, Texas - USA; **24 hours a day - 7 days a week**

Northern Antenna - serving the USA and Canada

- 13815 KHz, from 7am to 5pm California Time (1400-0000 UTC)
- 5810 KHz, from 5pm to 7am California Time (0000-1400 UTC)

Southern Antenna - serving all of Latin America

- 15725 KHz, from 7am to 5pm California Time (1400-0000 UTC)
 - 13740 KHz, from 5pm to 6pm California Time (0000-0100 UTC)
 - 9815 KHz, from 6pm to 7am California Time (0100-1400 UTC)
-

RADIO MOSCOW

24 hours a day - 7 days a week

Novosibirsk

- 12065 KHz, from 8pm to 3am California Time (0300-1000 UTC)
- 12050 KHz, from 3am to 9am California Time (1000-1600 UTC)

Krasnodar

- 13645 KHz, from 8pm to 12am California Time (0300-0700 UTC)

Samara

- 17590 KHz, from 12am to 9am California Time (0700-1600 UTC)
-

SWAZI RADIO

Swaziland, Southern Africa

- 6155 KHz SW, from 8pm to 12am California Time (0300-0700 UTC)
 - 1377 KHz AM, from 8pm to 12am California Time (0300-0700 UTC)
-

HIGH ADVENTURE

Mt. Hermon, Israel

Dr. Scott's "Table of the Lord" (Communion) programs can be heard on the following frequencies:

- 9960 & 6280 KHz Short-wave
 - 945 KHz AM
 - 104.5 & 105.1 MHz FM
-

THE CARIBBEAN BEACON

Anguilla, British West Indies; *24 hours a day - 7 days a week*

- 690 KHz AM

- 1610 KHz AM
- 100.1 MHz FM
- **New Short-Wave Transmissions!**

- 11775 KHz SW - Daytime
- 6090 KHz SW - Nighttime

TELEVISION INFORMATION

for Southern California viewers

WORLD TELEVISION

7 days a week from 9 pm to 11 pm, and from 1 am to 4 am
except Channel 38 (11 pm to 1 am also), and **Sunday Services** 11 am to 1 pm

- **Channel 38** - West Los Angeles and San Bernardino*
- **Channel 24** - San Fernando Valley
- **Channel 63** - San Diego
- ***11 PM to 1 AM seven days a week!**

CENTURY CABLE

- West Los Angeles area; **Wednesdays & Thursdays**, 10 pm - 11 pm

CHARTER CABLE

- Pasadena, Riverside & San Gabriel Valley areas; **Wednesdays & Thursdays**, 10 pm - 11 pm

KDOC

- **Channel 56**, Orange County (carried by most cable companies); **Sundays**, 2 pm - 4:30 pm

KVMD

- **Channel 31**, California Desert areas; **7 days a week, 24 hours a day!**

K49EK

- **Channel 49**, Santa Barbara & surrounding areas; **7 days a week, 24 hours a day!**

for Connecticut viewers

WHCT

- **Channel 18**, Hartford, Connecticut; **Sundays**, 2 pm - 4 pm (Hartford time)
-

for Texas viewers

KXTX

- **Channel 39**, Dallas/Ft. Worth area; **Sundays**, 12 am - 2 am (Texas time)

KLNM

- **Channel 42**, Lufkin; **7 days a week**, 12 am - 5 am (Texas time)
-

for Chicago & northwest Indiana viewers

WJYS

- **Channel 62**, Chicago & northwest Indiana; **Sundays**, 1 pm - 3 pm (Chicago time)
-

for Pennsylvania viewers

Ch. 51

- Philadelphia area; **Sundays**, 11 am - 12 pm (Pennsylvania time)
-

for El Salvador viewers

Ch. 17, San Salvador

- **Sunday 1:30 pm - 3:30 pm** local time (2130 - 2330 UTC)
 - **Monday & Thursday 2:30 pm - 4:30 pm** local time (2230 - 0030 UTC)
 - **Wednesday 11:00 pm - 1:00 am** local time (0700 - 0900 UTC)
-
-



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ATTACHMENT D

Program Logs of Station KVMD(TV),
Twentynine Palms, California
for January 3-8, 1999

PROGRAM LOG KVMD CHANNEL 31

Pacific Standard Time

PAGE 1 OF 1
Sunday 1-3-99

START	PROGRAM	LENGTH	SOURCE	TYPE
9:05:05-9:06:15	Sign On Announcement	:70	VTR	PA
9:06:25-9:06:35	ID	:10	VTR	ID
9:06:36	University Network		Sat	Net
10:00:00-10:00:10	ID	:10	VTR	ID
10:00:11	University Network		Sat	Net
11:00:00-11:00:10	ID	:10	VTR	ID
11:00:11	University Network		Sat	Net
12:00:00-12:00:10	ID	:10	VTR	ID
12:00:11	University Network		Sat	Net
13:00:00-13:00:10	ID	:10	VTR	ID
13:00:11	University Network		Sat	Net
14:00:00-14:00:10	ID	:10	VTR	ID
14:00:11	University Network		Sat	Net
15:00:00-15:00:10	ID	:10	VTR	ID
15:00:11	University Network		Sat	Net
16:00:00-16:00:10	ID	:10	VTR	ID
16:00:11	University Network		Sat	Net
17:00:00-17:00:10	ID	:10	VTR	ID
17:19:40-17:19:50				
17:20:00-17:21:10	Sign off Announcement	:70	Sat	Net

Total Hours Aired for University Network: 8 hours 15 minutes

Larry Peterson
Stephanie Miles



PROGRAM LOG KVMD CHANNEL 31

Pacific Standard Time

PAGE 1 OF 1
Monday 1/4/99

START	PROGRAM	LENGTH	SOURCE	TYPE
8:38:00-8:39:10	Sign On Announcement	:70	VTR	PA
8:39:11-8:39:21	ID	:10	VTR	ID
8:39:22	University Network		Sat	Net
9:00:00-9:00:10	ID	:10	VTR	ID
9:00:11	University Network		Sat	Net
10:00:00-10:00:10	ID	:10	VTR	ID
10:00:11	University Network		Sat	Net
11:00:00-11:00:10	ID	:10	VTR	ID
11:00:11	University Network		Sat	Net
12:00:00-12:00:10	ID	:10	VTR	ID
12:00:11	University Network		Sat	Net
13:00:00-13:00:10	ID	:10	VTR	ID
13:00:11	University Network		Sat	Net
14:00:00-14:00:10	ID	:10	VTR	ID
14:00:11	University Network		Sat	Net
15:00:00-15:00:10	ID	:10	VTR	ID
15:00:11	University Network		Sat	Net
16:00:00-16:00:10	ID	:10	VTR	ID
16:00:11	University Network		Sat	Net
16:30:00-16:30:10	ID	:10	VTR	ID
16:30:11-16:31:21	Sign off Announcement	:70	Sat	Net

Total Hours Aired for University Network: 7.75 hours

Larry Peterson
Sherrie Karr



PROGRAM LOG KVMD CHANNEL 31

Pacific Standard Time

PAGE 1 OF 1
Tuesday 01-05-99

START	PROGRAM	LENGTH	SOURCE	TYPE
09:23:00-09:24:10	Sign on announcement	:70	VTR	PA
09:24:20-09:24:30	ID	:10	VTR	ID
9:24:31	University Network		Sat	Net
10:00:00-10:00:10	ID	:10	VTR	ID
10:00:11	University Network		Sat	Net
11:00:00-11:00:10	ID	:10	VTR	ID
11:00:11	University Network		Sat	Net
12:00:00-12:00:10	ID	:10	VTR	ID
12:00:11	University Network		Sat	Net
13:00:00-13:00:10	ID	:10	VTR	ID
13:00:11	University Network		Sat	Net
14:00:00-14:00:10	ID	:10	VTR	ID
14:00:11	University Network		Sat	Net
15:00:00-15:00:10	ID	:10	VTR	ID
15:00:11	University Network		Sat	Net
16:00:00-16:00:10	ID	:10	VTR	ID
16:00:11	University Network		Sat	Net
16:30:00-16:30:10	ID	:10	VTR	ID
16:30:11-16:31:21	Sign off announcement	:70	VTR	PA

Total Hours Aired for University Network: 7 Hours

Larry Peterson
Stephanie Miles



PROGRAM LOG KVMD CHANNEL 31

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Wednesday 1-6-99

START	PROGRAM	LENGTH	SOURCE	TYPE
8:29:30-8:30:40	Sign On Announcement	:70	VTR	PA
8:30:50-8:31:00	ID	:10	VTR	ID
8:31:01	University Network		Sat	Net
9:00:00-9:00:10	ID	:10	VTR	ID
9:00:11	University Network		Sat	Net
10:00:00-10:00:10	ID	:10	VTR	ID
10:00:11	University Network		Sat	Net
11:00:00-11:00:10	ID	:10	VTR	ID
11:00:11	University Network		Sat	Net
12:00:00-12:00:10	ID	:10	VTR	ID
12:00:11	University Network		Sat	Net
13:00:00-13:00:10	ID	:10	VTR	ID
13:00:11	Joshua Basin Water Dist.	2:02:00	VTR	taped: 12-16-98
14:00:00-14:00:10	ID	:10	VTR	ID
14:00:11	Joshua Basin Water Dist.	2:02:00	VTR	taped 12-16-98
15:00:00-15:00:10	ID	:10	VTR	ID
15:00:11-15:03:30	Joshua Basin Water Dist.	2:02:00	VTR	taped: 12-16-98
15:03:40-15:03:50	ID	:10	VTR	ID
15:04:00-15:05:10	Sign off Announcement	:70	Sat	Net

Total Hours Aired for University Network: 4 1/2 hours

Larry Peterson
Stephanie Miles



PROGRAM LOG KVMD CHANNEL 31

Pacific Standard Time

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Thursday 1-7-99

START	PROGRAM	LENGTH	SOURCE	TYPE
8:29:40-8:30:50	Sign On Announcement	:70	VTR	PA
8:31:00-8:31:10	ID	:10	VTR	ID
8:31:11	University Network		Sat	Net
9:00:00-9:00:10	ID	:10	VTR	ID
9:00:11	University Network		Sat	Net
10:00:00-10:00:10	ID	:10	VTR	ID
10:00:11	University Network		Sat	Net
11:00:00-11:00:10	ID	:10	VTR	ID
11:00:11	University Network		Sat	Net
12:00:00-12:00:10	ID	:10	VTR	ID
12:00:11	See Additional Sheets for Profiles in Praise and Childrens Shows			
16:01:50-16:02:00	ID	:10	VTR	ID
16:02:10-16:03:20	Sign Off Announcement	:70	VTR	PA

Total Hours Aired For University Network: 4 hours

Larry Peterson
Stephanie Miles



KVMD-TV 31 PROGRAM LOG

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Pacific Standard-

Day: Thursday

Date: 1-7-99

Start	Finish	Program	Length	Source	Type
12:00:00-12:00:20		Error	:20	VTR	PI
12:00:20-12:01:20		1-888-728-6639	:60	VTR	PI
12:01:20-12:01:30		Praise TV	:10	VTR	
12:01:30-12:08:00		Profiles In Praise	6:30	VTR	
12:08:00-12:08:30		Cafe Video	:30	VTR	
12:08:30-12:09:00		Praise TV	:30	VTR	
12:09:00-12:09:30		Touched by an Angel	:30	VTR	PI
12:09:30-12:10:30		Family Christian Stores	:60	VTR	PI
12:10:30-12:19:30		Profiles In Praise	9:00	VTR	
12:19:30-12:21:30		1-888-431-1122	2:00	VTR	PI
12:21:30-12:29:30		Profiles In Praise	8:00	VTR	
12:29:30-12:29:50		Error	:20	VTR	
12:29:50-12:30:00		Worship	:10	VTR	
12:30:00-12:30:10		Becky's Barn Icon	:10	VTR	
12:30:10-12:30:20		CTN	:10	VTR	
12:30:20-12:58:50		Becky's Barn	28:30	VTR	
12:58:50-12:59:20		Math is Power	:30	VTR	
12:59:20-12:59:50		American Heart Assoc.	:30	VTR	
12:59:50-13:00:00		ID	:10	VTR	ID
13:00:00-13:00:10		Sunshine Factory Icon	:10	VTR	
13:00:10-13:10:30		Sunshine Factory	10:20	VTR	
13:10:30-13:11:00		Worship	:30	VTR	
13:11:00-13:11:30		Physical Fitness	:30	VTR	PSA
13:11:30-13:12:00		Salvation Army	:30	VTR	PSA
13:12:00-13:12:30		RADD	:30	VTR	PSA
13:12:30-13:16:00		Sunshine Factory	3:30	VTR	
13:16:00-13:18:00		Little House	2:00	VTR	PI
13:18:00-13:27:00		Sunshine Factory	9:00	VTR	
13:27:00-13:27:30		Promise	:30	VTR	PSA

KVMD-TV 31 PROGRAM LOG

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Pacific Standard

Day: Thursday

Date: 1-7-99

Start	Finish	Program	Length	Source	Type
13:27:30-13:28:00		Scruff McGruff	:30	VTR	PSA
13:28:00-13:28:30		The New JA	:30	VTR	PSA
13:28:30-13:29:00		Smokey The Bear	:30	VTR	PSA
13:29:00-13:29:30		Recycle	:30	VTR	PSA
13:29:30-13:30:00		1-800-790-DADS	:30	VTR	PSA
13:30:00-13:30:10		Sonshiny Day Icon	:10	VTR	
13:30:10-13:34:00		Sonshiny Day	3:50	VTR	
13:34:00-13:34:30		Math is Power	:30	VTR	PSA
13:34:30-13:35:00		Promise	:30	VTR	PSA
13:35:00-13:35:30		Woodsy	:30	VTR	PSA
13:35:30-13:36:30		American Heart Assoc.	:30	VTR	PSA
13:36:00-13:50:10		Sonshiny Day	14:10	VTR	
13:50:10-13:50:40		Childreach	:30	VTR	PSA
13:50:40-13:51:10		Worship	:30	VTR	
13:51:10-13:59:00		Sonshiny Day	7:50	VTR	
13:59:00-13:59:30		Scruff McGruff	:30	VTR	PSA
13:59:30-14:00:00		Promise	:30	VTR	PSA
14:00:00-14:00:10		ID	:10	VTR	ID
14:00:10-14:00:20		Worship For Kids Icon	:10	VTR	
14:00:20-14:07:30		Worship For Kids	7:10	VTR	
14:07:30-14:08:00		Math is Power	:30	VTR	PSA
14:08:00-14:08:30		Scruff McGruff	:30	VTR	PSA
14:08:30-14:27:50		Worship For Kids	19:20	VTR	
14:27:50-14:28:20		Worship	:30	VTR	
14:28:20-14:28:50		1-888-77YOUTH	:30	VTR	PSA
14:28:50-14:29:20		The New JA	:30	VTR	PSA
14:29:20-14:29:50		Promise	:30	VTR	PSA
14:29:50-14:30:00		Just Kids Icon	:10	VTR	
14:30:00-14:35:20		Just Kids	5:20	VTR	

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Pacific Standard

Day: Thursday

Date: 1-7-99

Start	Finish	Program	Length	Source	Type
14:35:20-14:35:50		United Negro College	:30	VTR	PSA
14:35:50-14:36:20		Worship	:30	VTR	PSA
14:36:20-14:44:20		Just Kids	8:00	VTR	
14:44:20-14:46:20		Little House	2:00	VTR	PI
14:46:20-14:51:30		Just Kids	5:10	VTR	
14:51:30-14:53:30		Little House	2:00	VTR	PI
14:53:30-14:58:30		Just Kids	5:10	VTR	
14:58:30-14:59:00		Math is Power	:30	VTR	PSA
14:59:00-14:59:30		The New JA	:30	VTR	PSA
14:59:30-15:00:00		United Negro College	:30	VTR	PSA
15:00:00-15:00:10		ID	:10	VTR	ID
15:00:10-15:00:20		Joy Junction Icon	:10	VTR	
15:00:20-15:00:30		CTN	:10	VTR	
15:00:30-15:29:20		Joy Junction	28:50	VTR	
15:29:20-15:29:50		American Heart Assoc.	:30	VTR	PSA
15:29:50-15:30:20		Smokey The Bear	:30	VTR	PSA
15:30:20-15:30:30		Error	:10	VTR	
15:30:30-15:36:10		Profiles In Praise	5:40	VTR	
15:36:10-15:36:40		Cafe Video	:30	VTR	
15:36:40-15:37:10		Praise TV	:30	VTR	
15:37:10-15:37:40		Touched by an Angel	:30	VTR	PI
15:37:40-15:38:40		1-888-523-DOVE	:60	VTR	PI
15:38:40-15:47:40		Profiles In Praise	9:00	VTR	
15:47:40-15:49:40		1-888-431-1122	2:00	VTR	PI
15:49:40-15:57:40		Profiles In Praise	8:00	VTR	
15:57:40-15:59:40		1-888-431-1122	2:00	VTR	PI