JUL 22 1999

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the matter of:	)	
	)	
Amendment of Section 73.202(b),	)	DOCKET FILE COPY ORIGINAL
Table of Allotments,	)	
FM Broadcast Stations	)	
	)	MM Docket 99-202
(Mountainaire, AZ)	)	RM-9620
	)	
(Flagstaff, AZ)	)	MM Docket 99-210
	)	RM-9629
	)	
(Winona, AZ)	)	MM Docket 99-211
	)	RM-9630

COMMENTS OF REC NETWORKS

COMBINED COMMENT FILING

1. Based on the facts in which we will state within these comments based on the geographic locations of the communities in the proceedings captioned above, REC Networks ("REC") feels that it is appropriate to file it's comments in a single document.

OVERVIEW

2. REC Networks, a group of people who support the development low power radio and through our wholly owned entity, The Arizona Microradio Assocation ("AzMA"), oppose the allotment Channel 293A to "Mountainaire", AZ as well as the allotment of 242C2 to Winona, AZ. REC will support the petitioner's request to allot Channel 279C3 to Flagstaff is it's fifth aural service.

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List A B C D E

MOUNTAINAIRE, ARIZONA

3. Just as the Commission was questioning about Mountainaire, Arizona; so were we. According to the US Census Bureau's TIGER Mapping Service, the geographic location the petitioner is stating for Mountainaire is actually located north west of Flagstaff right on the outskirts of the urbanized area. Actually the proposed coordinates shown in the NPRM are less than one tenth of one mile outside the city limit of Flagstaff.

4. Searching the U S WEST DEX White Pages directory[1], we find that Mountainaire is recognized as a "community" in the telephone directory however searching the word "Mountainaire", we only find "Mountainaire Store" and a tavern. An additional business, Mountainaire Media is located in nearby Munds Park.

5. "Mountainaire" is located in Coconino County. The Coconino County Sheriff Department's website lists many of the communities they serve. The Flagstaff Patrol district shows many of the unincorporated areas near Flagstaff however "Mountainaire" is not shown. This is not to say that the Sheriff Department does not cover "Mountainaire" but maybe that "Mountainaire" is not significant enough to be considered a community.

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1 – U S WEST is the telephone company for the Mountainaire area. Checking the prefixes (NXX) on the telephone numbers for Mountainaire Store and Mountainaire Tavern in the Local Exchange Routing Guide (LERG), the prefixes are in the Flagstaff rate center.

2 - http://co.coconino.az.us/sheriff/content.cfm?p=patrol

6. After doing web site searches using the popular Alta Vista, Hot Bot, Lycos web sites as well as the popular Access Arizona web site, we were not able to find any web pages with content relating to "Mountainaire", Arizona.

7. Based on our findings we are inclined to conclude that "Mountainaire" is a subdivision in the unincorporated area just outside of Flagstaff and therefore would not be a community for allotment purposes.

WINONA, ARIZONA

8. The community of Winona was glamorized in the 1960's song "Route 66".[3] as one of the roadside rests along "America's Highway". As the petitioner stated, Winona is several miles east of Flagstaff along Interstate 40.

9. Checking the U S WEST DEX directory, Winona is not recognized as a community however a search in the entire Coconino County directory only shows one listing for Winona Texaco where "Winona" is the first word[4].

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3 – In the lyrics of the song "Route 66", it mentions "..Gallup, New Mexico.. Flagstaff, Arizona, don't forget *Winona*... Kingman, Barstow, San Bernardino.".

4 – Many significant communities would have many listings in the directory that contain the town name as the first word. Winona only having one listing, a service station would indicate that Winona is strictly a roadside rest and not a community for allotment purposes.

10. Checking major search engines like Alta Vista, Lycos and Hot Bot, we find references to Winona is it relates to the old US Highway 66. In the appendix of this filing, we have enclosed a picture taken from a Route 66 fan web site[5] which shows a picture taken from a location one mile outside of Winona from the old U S Highway 66. In the background, you see Interstate 40 with a sign advising that Winona is one mile away.

11. Winona is located in Coconino County. Based on the same Sheriff Department web site we checked for "Mountainaire", there was also no mention of Winona.

12. Based on the information presented, it appears to us that Winona is a roadside rest and even though it may have residents, we feel that the area is dependent, both in the public and private sectors on Flagstaff and should not be considered a community for allotment purposes.

LPFM AS AN ALTERNATIVE

13. REC feels that based on the size, population and make up of these areas, these communities would be better served by the Low Power Radio Service being proposed in Mass Media Docket 99-25. According to the REC Channel Search, which takes into consideration all stations authorized at the release of MM Docket 99-25, giving primary preference to translators and boosters, we find that there are channels available in all proposed power levels from 10 to 1000 watts in both communities.

5 - http://astro4.ast.vill.edu/66/az.htm

THE CONNECTION BETWEEN THESE THREE PETITIONS

14. After doing additional research we have discovered that if the Commission grants all three allotments to the petitioner, it would result in **three additional stations whose 60dBu contours cover the entire City of Flagstaff.**[6] The petitioner has stated that they plan to apply for licenses on all three channels if allotments are made. We will attach a map which shows the 60 dBu contours of the allotments under consideration.

15. The location shown for the proposed Flagstaff allotment (35-17-19 NL; 111-38-26 WL) is within the 60 dBu protected service contours of 3 NCE-FM stations in Flagstaff and one in Sedona as well as within the 60 dBu protected service contours of 12 commercial FM stations as well as several translators. As you can see, Flagstaff is very well served by FM services and we don't feel there is a need for 3 additional stations.

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6 – It's not that we do not want to see the expansion of radio services in Flagstaff, we object to the trend of using a city of license of a nearby small town under the guise of "first aural service" in order to provide an additional channel to a more urbanized area which already has multiple FM services. What makes these petitions more interesting is that the same party is filing for three different channels to serve primarily the same area and intends to provide service on all three channels. In the case of Winona, it may be a highway roadside rest with a minimal population, but it is well served by FM stations in Flagstaff. We have no objection to allotments, similar to those given to Essex, CA and Ludlow, CA as these communities have no urbanized area within it's primary service area and it provides a vital service along two major interstate highways (I-15 and I-40).

7 – By proposing two channels to Flagstaff, it would better represent the area it serves without having to use the "city of license" loophole, which in our opinion INSULTS the communities that are being "used". In this petition, the communities of Mountainaire and Winona are being SLAPPED IN THE FACE by these allotments because just like we have seen with the allotments of Channel 262 to Globe, AZ and Channel 298 to Pahrump, NV; the licensee no longer programs to the city of license but instead programs to the major metropolitan areas (Phoenix and Las Vegas respectively).

CONCLUSION

16. We feel that the petitioner is capable of providing a radio service, which can meet the needs of the people of Flagstaff and we have confidence in the Commission's feelings that Flagstaff would benefit from a fifth aural service. Therefore, we ask the Commission to GRANT the petitioner's request to amend Channel 279C3 to Flagstaff, Arizona.

17. REC is concerned about the type of local service that the petitioner would be able to provide to the subdivision called "Mountainaire" and the area called Winona. REC is also concerned due to the fact that the grant of all three of these petitions would result in three new stations within the 60 dBu contour of Flagstaff which would comprise 20% of all of the commercial stations which have 60 dBu contours over Flagstaff. We urge the Commission to DENY the allotment of Channel 293A to "Mountainaire", AZ and the allotment of Channel 242C3 to Winona, AZ.

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8 - Our goal is to assure that there are low power channels available to small areas such as "Mountainaire" and Winona in the event that the Commission amends the rules as proposed in MM Docket 99-25.

18. Due to the fact that there were two petitioners who were asking for channels in the Flagstaff area, the Commission may wish to look at an alternate plan which would allot Channel 279C3 to Flagstaff as their fifth aural service and Channel 293A to Flagstaff, AZ as their sixth aural service. Channel 293A can serve Flagstaff from the same geographic location that Channel 279C3 is being proposed at while meeting all Commission distance spacing guidelines. This plan would provide Mountain West and Mark S. Haughwout with the allotments they petitioned for, provide better FM service to Flagstaff, have the city of license of the two stations better represent the actual communities they are serving as well as reduce the chances of mutually exclusive applications. We feel that this would serve the public interest better than assigning full power channels to "Mountainaire" and Winona.[8]

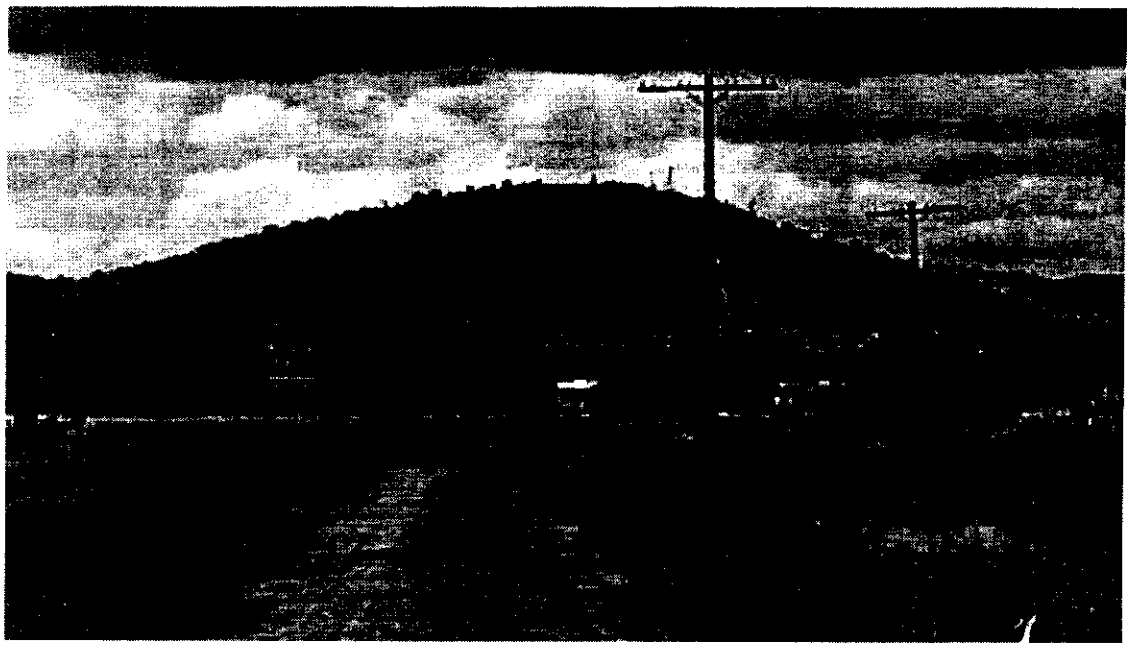
19. REC has no intention of filing any applications for any of the channels proposed.

Respectfully Submitted,

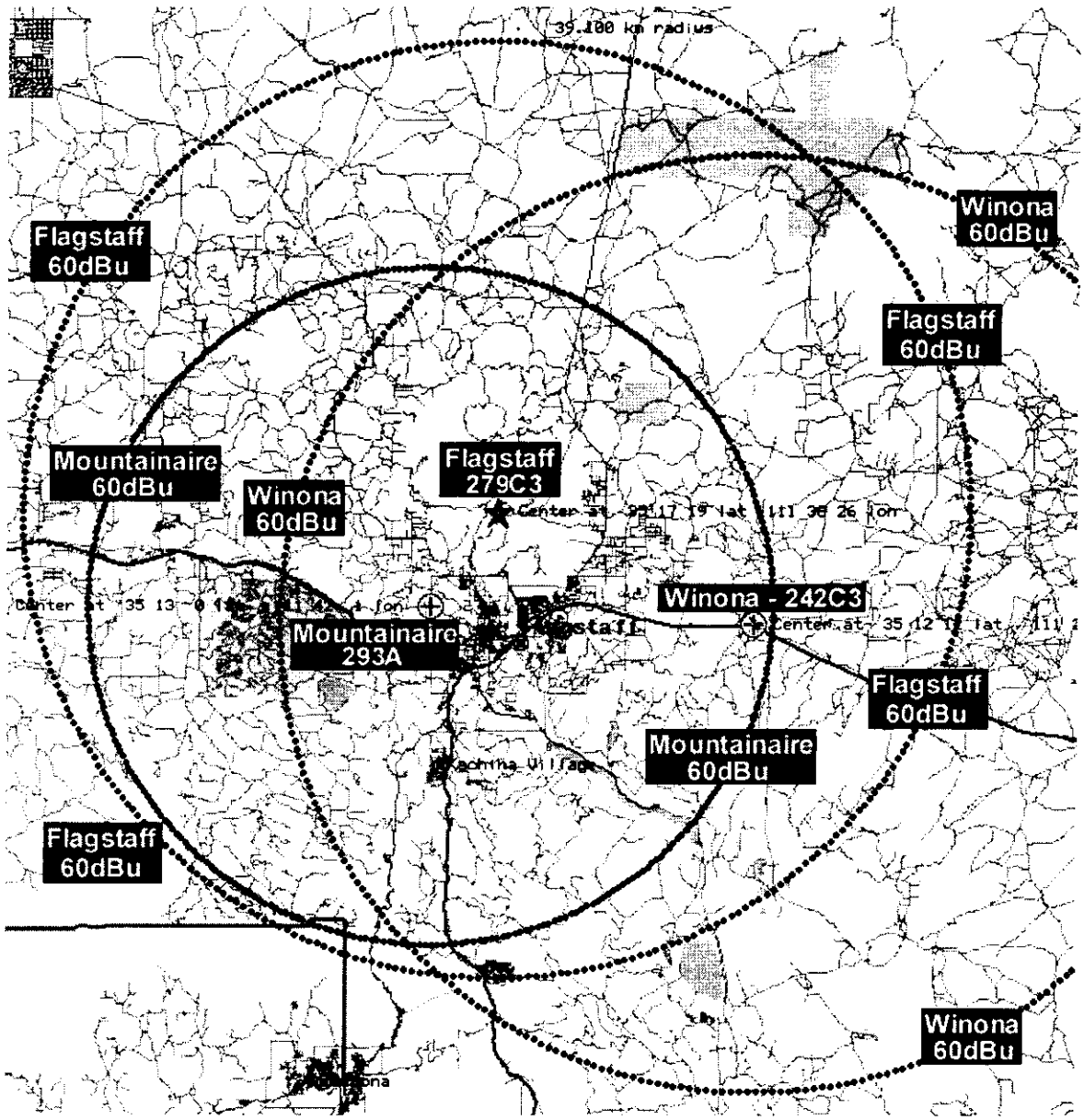
Rich Eyre
REC Networks
P O Box 2408
Tempe, AZ 85280-2408
rec@recnet.com
http://www.recnet.com

Enclosures

APPENDIX A – PICTURE OF WINONA, AZ MENTIONED AT 10



APPENDIX B – 60 dBu CONTOURS OF STATIONS PROPOSED BY MOUNTAIN WEST BROADCASTING AT FLAGSTAFF, MOUNTAINAIRE AND WINONA



CERTIFICATE OF SERVICE

This is to certify that a copy of these comments has been served on the petitioner:

MOUNTAIN WEST BROADCASTING
C/O VICTOR A MICHAEL JR.
6807 FOXGLOVE DR.
CHEYENNE, WY 82009

June 4, 1999