

Before the  
Federal Communications Commission  
Washington, D.C. 20554

RECEIVED  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b) )  
of the Rules (Table of Allotments) )  
(Barnwell, SC; Pembroke, GA; )  
Douglas, GA; Willacoochee, GA) )

RM-

To: The Commission

PETITION FOR RULE MAKING

Bullie Broadcasting Corporation ("Bullie"), licensee of WBAW-FM, Channel 256C3, Barnwell, South Carolina, through counsel and pursuant to Sections 1.401 and 1.420 of the Rules, hereby petitions the FCC to initiate a rulemaking proceeding proposing the amendment of Section 73.202(b) of the Rules, the Table of FM Allotments, as follows:

STEP ONE

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Barnwell, South Carolina	256C3	--
Pembroke, Georgia	--	257C1
Douglas, Georgia	258C1, 294C1	294C1
Willahoochee, Georgia	--	258C1

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**STEP TWO**

<b><u>Community</u></b>	<b><u>After Step One</u></b>	<b><u>Proposed</u></b>
Barnwell, South Carolina	--	256C3 (with a site restriction) <sup>1</sup>

**FINAL TABLE**

<b><u>Community</u></b>	<b><u>Present</u></b>	<b><u>Proposed</u></b>
Barnwell, South Carolina	256C3	256C3 (with a site restriction)
Pembroke, Georgia	--	257C1
Douglas, Georgia	258C1, 294C1	294C1
Willahoochee, Georgia	--	258C1

***The Proposal***

Specifically, Bullie asks the FCC to exercise its power, under Section 316(a) of the Communications Act and pursuant to the *Report and Order* in MM Docket No. 88-526, 4 FCC Rcd 4870 (1989) ("Modification of FM and TV Authorizations to Specify a New Community of License") (hereafter, the "*Community of License R&O*") to, in Step One:

(1) Amend the FM Table of Allotments to delete Channel 258C1 at Douglas, Georgia, add Channel 258C1 at Willahoochee, Georgia, at reference coordinates of 31° 20' 27" N and 83° 24' 30" W, and modify the license of WDMG-FM to specify operation on Channel 258C1 at Willahoochee. The licensee of WDMG-FM, Jumbo Thing, Inc. ("Jumbo Thing"), has agreed to consent to the proposed modification of the WDMG-FM license (see Attachment A hereto), and Bullie has agreed to reimburse Jumbo Thing for the costs incurred in moving the WDMG-FM transmitter (including construction of a new transmission tower) to a site which conforms to the new allotment at Willahoochee.

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<sup>1</sup> The restricted coordinates are 33° 24' 29" N and 81° 16' 43" W, approximately twenty kilometers north-northeast of the center of Barnwell.

(2) Amend the Table of FM Allotments to delete Channel 256C3 at Barnwell, South Carolina, add Channel 257C1 to the Table of FM Allotments at Pembroke, Georgia, with reference coordinates of 32° 11' 13" N and 81° 48' 04" W, and modify the license of WBAW-FM to specify operation on Channel 257C1 at Pembroke.

Then, in Step Two, following the changes described in the two preceding paragraphs, Bullie asks the FCC to add Channel 256C3 to the Table of FM Allotments at Barnwell, South Carolina, with a site restriction approximately twenty kilometers north-northeast of the center of Barnwell, at reference coordinates of 33° 24' 29" N and 81° 16' 43" W.<sup>2</sup>

The foregoing changes are consistent with the *Community of License R&O*, with the *Report and Order* in BC Docket No. 85-313, 60 R.R. 2d 114 (1986) ("Modification of FM Broadcast Licenses to Higher Class Co-Channel or Adjacent Channels"), and with precedent articulated in the FCC's recent *Notice of Proposed Rule Making* in MM Docket No. 99-256 (Refugio and Taft, Texas), DA 99-1377, released July 16, 1999 (the "*Refugio NPRM*"). Each proposed change is mutually exclusive with operation under the existing Table of Allotments and the proposed changes will, overall, result in a preferential ordering of allotments.

***Demonstration of Overall Benefit to the Public Interest***

For reference purposes, the FCC's allotment priorities are as follows: (1) first aural service, (2) second aural service, (3) first local service, and (4) other public interest

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<sup>2</sup> The technical feasibility of the proposed changes in accordance with the minimum separation requirements for FM broadcast stations and other FCC policies affecting the allotment of FM channels is demonstrated in the engineering statement of the Bullie's consulting engineer, William A. Culpepper (Attachment B hereto).

matters. Priorities (2) and (3) are given equal weight. *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 92 (1982).

The proposed changes will provide a first local service (Priority Three) to the communities of Pembroke and Willacoochee. Bullie hereby pledges to file, promptly after completion of the requested rulemaking proceeding, an application on FCC Form 301 for modified facilities for WBAW-FM and to proceed promptly to construct the facilities authorized in the construction permit. (Bullie has a verbal agreement for a site for WBAW-FM at Pembroke.) As previously noted, Jumbo Thing has consented to modification of its license for WDMG-FM; Bullie has a verbal agreement with the landowner at the reference coordinates for the Willacoochee allotment and will cooperate with Jumbo Thing to secure a construction permit and construct a new, Class C1 transmission facilities at the site at the earliest possible date. Operation of the modified WBAW-FM facilities at Pembroke will commence only when WDMG-FM has commenced operation at Willacoochee with its modified facilities.

No community will be left without local service. Douglas, Georgia, will continue to be the community of license of AM stations WDMG and WOKA and FM station WOKA-FM. Barnwell, South Carolina, will continue to be the community of license of AM station WMXG. In addition, with the modification of the WBAW-FM license to specify operation on Channel 257C1 at Pembroke, Bullie proposes, in Step Two, the reallocation of Channel 256C3 to Barnwell with a site restriction approximately twenty kilometers north-northeast of the center of Barnwell, at reference coordinates of 33° 24' 29" N and 81° 16' 43" W, in

order that Barnwell will continue to have a second local service.<sup>3</sup> Bullie hereby pledges that it will (1) file an application for a construction permit for a new station on the site-restricted channel at the first opportunity; (2) if there are mutually-exclusive applications for the site-restricted facility, make a qualifying up-front payment and bid for the construction permit, and (3) if its application is granted, proceed promptly to construct the station and begin operation on the site-restricted Channel 256C3 allotment.

Both Pembroke and Willacoochee are significant, independent communities that will benefit from the allotment of a first local service.

Pembroke is an incorporated city, governed by a mayor and a five-member City Council which meets the second Tuesday of each month. It is the County Seat of Bryan County. Pembroke had a 1990 population of 1,503 and an estimated population in 1997 of 1,638. The city has a total of 16 employees, including its own police department with five officers, and a volunteer fire department. The city provides residents with parks (the largest park is Pickett Park), water and sewage services, and trash hauling, among other services. Pembroke has an elementary school, a middle school and a high school operated by Bryan County, and a K-12 private school. Churches in the community include the First Baptist Church of Pembroke, Beulah Baptist Church, Northside Baptist, Mt. Mariah Baptist, Pembroke United Methodist and St. Paul AME Church. Civic clubs include the Lions Club, an American Legion Post and a Masonic Lodge. The largest employer in Pembroke is Bryan County and the Bryan County Public Schools. Local businesses

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<sup>3</sup> Barnwell is a county seat and a significant community (population 5,255 (1990)) meriting a second local aural service. The reference coordinates are in a rural area which includes a number of potentially suitable transmitter sites.

include Shuman Owens Supply Company, Western Auto, Pembroke Pharmacy, the Green Roof Restaurant, an IGA grocery store, a used car dealer, convenience stores and fast food outlets, an auto parts store, gun and pawn shops, a monument company and other retail stores. First Bank of Coastal Georgia has operated in Pembroke since 1907. The *Bryan County Times*, one of two weekly newspapers in Bryan County, is published in Pembroke.

Willacoochee is an incorporated town with a population of 1,205. It is governed by a mayor and a five-member Town Council which meets on the first Monday of every month. The town has ten full-time and three part-time employees. The police department has four full-time officers and one part-time officer. There is a volunteer fire department. Water and sewer service is provided by the town. The Atkinson County Public Schools operate the Willacoochee Elementary School (K-7). Among the larger retail establishments are Corbitt's Hardware, Mickey's Food Store, Dollar General and various convenience stores. The manufacturing base includes Fleetwood Mobile Homes, Willacoochee Industrial Fabrics, Pak Limited Plastics, Dormany Manufacturing, Hodges Manufacturing, L&M Supply Co., Special Structures (makers of modular homes), S&J Manufacturing (boat factory), Willacoochee Garment Factory, Kirkland Boat Factory, Brown's Lumber, and Langboard Presswood. Several of these companies have moved to Willacoochee within the past year. The community includes the Willacoochee Public Library, a number of churches (Willacoochee Church of God, Willacoochee United Methodist, Faith Baptist, Union Holiness Baptist, First Baptist, Willacoochee Holiness Baptist and Ebenezer

Baptist) and civic clubs and organizations such as the Masonic Lodge, Warp and Woof Historical Club, Willacoochee Action Committee and the Mahogany Women's Club.

As noted, Pembroke is located in Bryan County, which adjoins Chatham County. Much of Chatham County -- but not Bryan County -- is located in the Savannah, Georgia, Urbanized Area. However, the 70 dBu contour of the modified WBAW-FM facility at Pembroke will cover only ten percent of the Savannah Urbanized Area. Thus, the FCC's concern with the potential migration of stations from rural areas to urban areas (*Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) ) is not implicated by this aspect of the proposal. See *Headland, Alabama and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995).<sup>4</sup> Willacoochee is not near any urbanized area. Accordingly, a first local service preference -- Priority Three -- is justified for both communities.

Other public interest factors -- Priority Four -- overwhelmingly favor the proposed arrangement of allotments. The proposed modifications of the WBAW-FM and WDMG-FM licenses to specify Pembroke and Willacoochee, respectively, will result in a net gain of 680,579 persons within the stations' 60 dBu contours, calculated as follows:

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<sup>4</sup> Even if the modified WBAW-FM facilities were to cover a greater portion of the Savannah Urbanized Area, the foregoing information shows that Pembroke is clearly separate from and independent of the urbanized area. See *Report and Order* in MM Docket No. 97-72 (Mullins and Briarcliffe Acres, SC), DA 99-1284, released July 2, 1999 (town of 552 persons entitled to first local service preference and found to be independent of nearby Myrtle Beach urbanized area where the town had its own police department and contracted with private parties for other municipal services, even though the re-allotted station would provide 70 dBu service to 67 percent of the urbanized area).

	<u>Gain</u>	<u>Loss</u>	<u>Common</u>	<u>Net Change</u>
Barnwell/Pembroke	16,421 km <sup>2</sup>	4,688 km <sup>2</sup>	----	11,733 km <sup>2</sup>
	462,251(pop.)	60,258	----	401,993
Douglas/Willacoochee	13,719 km <sup>2</sup>	1,783 km <sup>2</sup>	2,701 km <sup>2</sup>	11,936 km <sup>2</sup>
	292,619(pop.)	14,033	35,629	278,586

In addition, the re-allotment of Channel 256C3 to Barnwell at the restricted transmitter site will provide service to a total of 81,477 persons, of whom 36,249 do not receive service from the existing WBAW-FM and none of whom would receive service from the modified WBAW-FM at Pembroke. A total of 15,030 persons who receive service from the existing WBAW-FM would not receive service from the new Channel 256CC3 restricted site facility. However, those persons have already been counted among the losses from re-allotment of WBAW-FM from Barnwell to Pembroke. (See the table at the end of the preceding paragraph of this Petition.) All of the 36,249 persons in the gain area for the restricted site Channel 256C3 allotment, therefore, represent a gain attributable to the proposed overall re-ordering of allotments, resulting in a total net gain of 716,828 persons.

The FCC endorsed a substantially identical proposal in the recent *Refugio NPRM*, to add a new channel at Refugio to replace the channel being deleted and re-allotted to Taft -- “[t]o ensure that local service will continue to be provided . . . .” *Refugio NPRM*, ¶ 5. The petitioner in that proceeding proposed to substitute Channel 293C2 for Channel 291C3 at Refugio and reallocate the substituted channel to Taft while modifying its license for station KTKY(FM) to specify operation at Taft. Then, to prevent the removal of Refugio’s

sole local aural service, the petitioner proposed to “backfill” by requesting the allotment of Channel 291A (the same frequency that had just been removed) to Refugio as a replacement channel and promising to file applications for both the re-alloted Channel 293C2 at Taft and Channel 291A at Refugio.

That, in essence, is what Bullie is proposing: to change in the FM Table of Allotments to remove Channel 256C3 at Barnwell, allot Channel 257C1 at Pembroke and modify the license for WBAW-FM accordingly, and then to “backfill” the Table of Allotments by assigning Channel 256C3 at Barnwell with a site restriction, to assure that Barnwell will continue to receive to local aural services (including AM station WMXG).

***Summary of Public Interest Benefits.***

Under Bullie’s proposal, two communities (Pembroke and Willacoochee) will receive a first local service. Through the combined reordering of the Table of Allotments, a net population of 716,828 will receive additional service. No community will be left with fewer than two local aural services. No area or population will be left “underserved” as a result of the proposed changes in the Table of Allotments. (See Attachment B, Figures 1A and 3A.)

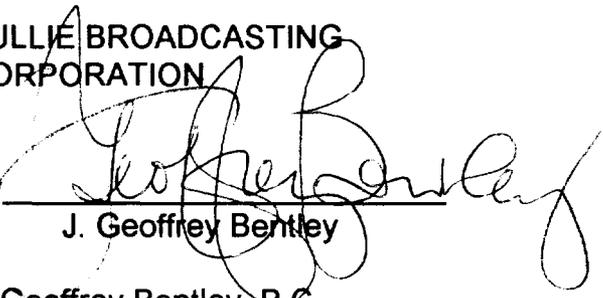
***Conclusion***

For the foregoing reasons, the FCC should grant this Petition, issue a Notice of Proposed Rule Making to amend the FM Table of Allotments in the manner described herein, and issue an Order to Jumbo Thing, Inc., to show cause why the license for

WDMG-FM should not be modified to reflect the change in the FM Table of Allotments and operation on Channel 258C1 at Willacoochee, Georgia.

Respectfully submitted,

BULLIE BROADCASTING  
CORPORATION

By 

J. Geoffrey Bentley

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Its Attorney

October 14, 1999

**ATTACHMENT A**

exhibit 1:

April 23, 1999

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

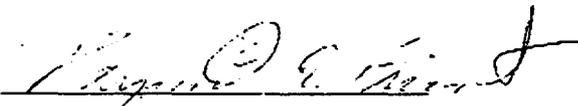
Re: RM- Barnwell, South Carolina, etc.

Dear Ms. Salas

Jumbo Thing Incorporated, licensee of FM broadcast station WDMG-FM, Douglas, Georgia, hereby consents to the proposal, made in the above-referenced Petition for Rulemaking by Bullie Broadcasting Corporation, to change the City Of License of, and transmitting coordinates of WDMG-FM. Jumbo Thing Incorporated also supports Bullie's proposed Rule Making Change for WBAW-FM, Barnwell, South Carolina from 256C3, Barnwell, South Carolina to 257C1, ~~Ludowici~~, Georgia.

**HAGAN**

Sincerely,

By 

President, Jumbo Thing Incorporated.

**ATTACHMENT B**

BULLIE BROADCASTING CORPORATION

BARNWELL, SC; PEMBROKE, GA; DOUGLAS, GA; WILLACOCHEE, GA

ENGINEERING EXHIBIT

September 1999

William Culpepper & Associates  
900 Jefferson Drive  
Charlotte, NC 28270

BULLIE BROADCASTING CORPORATION

BARNWELL, SC; PEMBROKE, GA; DOUGLAS, GA; WILLACOOCHEE, GA

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BULLIE BROADCASTING CORPORATION

BARNWELL, SC; PEMBROKE, GA; DOUGLAS, GA; WILLACOCHEE, GA

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BULLIE BROADCASTING CORPORATION

BARNWELL, SC; PEMBROKE, GA; DOUGLAS, GA; WILLACOCHEE, GA

DECLARATION

I declare, under penalty of perjury, that I have prepared the attached Engineering Exhibit for Bullie Broadcasting Corporation, and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief; and that I am a Registered Professional Engineer in the State of Georgia.

Executed on September 13, 1999.

  
\_\_\_\_\_

William A. Culpepper

William Culpepper & Associates  
900 Jefferson Drive  
Charlotte, NC 28270  
704-365-9995

BULLIE BROADCASTING CORPORATION

BARNWELL, SC; PEMBROKE, GA; DOUGLAS, GA; AND WILLACOOCHEE, GA

NARRATIVE

This exhibit has been prepared in support of a petition for rule making by Bullie Broadcasting Corporation, licensee of WBAW-FM, channel 256C3, Barnwell, South Carolina.

The purpose of the petition is to request:

1. A change in the channel of, and the upgrade of WBAW-FM from channel 256C3 to channel 257C1, and the re-assignment of the allotment from Barnwell, South Carolina to Pembroke, Georgia.
2. The re-assignment of WDMG-FM from Douglas, Georgia to Willacoochee, Georgia.
3. The re-allotment of channel 256C3 to Barnwell, South Carolina.

Barnwell, South Carolina / Pembroke, Georgia

The proposed reference point for WBAW at Pembroke is 32° 11' 13" north and 81° 48' 04" west, which is 17.8 kilometers at 288.7 degrees from Pembroke in order to avoid a short spacing to WYKZ and to the proposed Barnwell re-allotment on channel 256C3. This reference meets the spacing requirements of 73.207 (see page 5), and will easily place a 70 dBu signal over all of Pembroke. Pembroke is an incorporated town with a 1990 population of 1503, and it is the county seat of Bryan County.

Figures 1 and 1A show other services inside the WBAW-FM loss area by two methods as explained on the figures. Removal of WBAW-FM from Barnwell will not leave any under-served area (at least 5 services will remain in the present 60 dBu contour). The stations shown on the map are identified on Table 1, page 8. There is no common area between the present WBAW-FM coverage at Barnwell and the proposed coverage at Pembroke. These contours and area and population data are shown on Figure 4.

In addition to the fact that removal of WBAW-FM would not create any under-served area, implementation of the proposed re-allotment of channel 256C3 to Barnwell would create a large "back-fill" area. This is demonstrated on figure 1B and Figure 4. Figure 4 shows relevant area and population data for the re-allotment.

The Savannah urbanized area consists of Chatham County, Georgia less Skidaway Island CDP and Tybee Island city. The 70 dBu contour of the proposed WBAW class C1 facility has been plotted

BULLIE BROADCASTING CORPORATION

BARNWELL, SC; PEMBROKE, GA; DOUGLAS, GA; AND WILLACOOCHEE, GA

NARRATIVE... (continued)

on the map on page 14 showing Chatham County and that portion of the county excluded from the urbanized area. Measurements with a planimeter show that the proposed 70 dBu contour covers 10 percent of the urbanized portion of the county.

Allotment of channel 257C1 to Pembroke will provide that community with a First Local Radio Service. In addition, channel 256C3 can be re-allotted to Barnwell, as shown later in this exhibit.

The petitioner has an agreement with the owner of the land at the reference coordinates to permit construction of a maximum class C1 facility. This constitutes reasonable assurance of the availability of a transmitter site.

Allotment of channel 257C1 to Pembroke will not provide service to any area that is now underserved. This is demonstrated on Figures 2 and 2A.

Douglas, Georgia / Willacoochee, Georgia

The proposed reference point for WDMG-FM at Willacoochee is 31° 20' 27" north and 83° 24' 30" west. This is 34.5 kilometers due west of Willacoochee in order to avoid a short spacing to the proposed allotment at Pembroke. This location meets the spacing requirements of §73.207 (see page 6), and a class C1 facility at this location will place a 70 dBu signal over all of Willacoochee. Willacoochee is an incorporated town with a 1990 population of 1205.

The proposed WDMG 70 dBu signal will not enter any urbanized area.

Figure 3 shows the present and proposed WDMG-FM 60 dBu contours with present services with all non-directional, commercial FM contours, (except class C) at class maximum. The present WDMG contour is also shown at class maximum on Figure 3. Figure 3A shows all facilities at licensed parameters, including the present WDMG-FM, which is licensed for 51 kilowatts at 61 meters HAAT. Figures 3 and 3A illustrate that there is no under-served area in the present or proposed WDMG-FM contours. Stations providing service are identified on pages 11 and 12.

The present and proposed WDMG-FM contours and the area and population data are shown on Figure 5.

BULLIE BROADCASTING CORPORATION

BARNWELL, SC; PEMBROKE, GA; DOUGLAS, GA; AND WILLACOCHEE, GA

NARRATIVE... (continued)

PETITION TO REALLOT CHANNEL 256C3 TO BARNWELL

Bullie Broadcasting Corporation petitions to re-allot channel 256C3 to Barnwell, South Carolina, an incorporated city, which had a 1990 population of 5255. Barnwell is the county seat of Barnwell County.

The reference point for this proposal is 33° 24' 29" north and 81° 16' 43" west. This is approximately 20 kilometers north-northeast of Barnwell in order to avoid a short-spacing to the reference coordinates proposed for channel 257C1 at Pembroke. The reference point is in a rural area, and there is reasonable assurance that a transmitter site will be available.

Page 7 is a Channel Study for channel 256C3 from the Barnwell reference point to known facilities, authorizations, applications and proposals on the cochannel, the first, second, third, fifty-third and fifty-fourth adjacent channels.

Figure 6 demonstrates that the 70 dBu contour covers all of Barnwell from the reference site. The distance to the contour is 23.2 kilometers, developed by using 25 kilowatts and a uniform height of 100 meters. Figure 1B shows the present WBAW-FM contour and the proposed re-allotment contour with other services.

General

The term Contour as used in this exhibit refers to the 60 dBu contour of FM stations and the 0.5 mV/m contour of AM stations. FM contours were calculated at ten degree intervals using terrain data from the NGDC 30 second data base. AM contours were calculated at ten degree intervals using the Equivalent Distance Method, where appropriate.

Areas of the present and proposed contours were calculated. Areas inside the areas common to both the present and proposed contours was determined by planimeter. Populations were determined by computer program based on the 1990 census. Populations of common areas were determined by identifying census data centroids common to both present and proposed populations.



WILLIAM CULPEPPER & ASSOCIATES  
 900 JEFFERSON DRIVE CHARLOTTE NC

CHANNEL STUDY  
 WILLACOCHEE, GEORGIA

REFERENCE		DISPLAY DATES
31 20 27 N	CLASS C1	DATA 08-12-99
83 24 30 W	Current rules spacings	SEARCH 09-12-19
----- CHANNEL 258 - 99.5 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AD258	258C1	Willacoochee	GA	0.0	0.00	244.5	-244.50 *
AD257	257C1	Pembroke	GA	58.4	178.84	176.5	2.34 <
WOOFFM	259C1	Dothan	AL	266.8	179.11	176.5	2.61 <
WRKG	258A	La Crosse	FL	151.1	202.84	199.5	3.34
WKN	257C2	Lumpkin	GA	303.9	181.92	157.5	24.42
WAFI	260A	Unadilla	GA	342.1	112.72	74.5	38.22
WWFO	260C2	Lafayette	FL	220.0	122.35	78.5	43.85
WBZE	255C1	Tallahassee	FL	221.7	125.81	81.5	44.31
WWFO	260C2	Lafayette	FL	207.2	123.51	78.5	45.01
WFSUFM	205C	Tallahassee	FL	214.4	90.06	40.5	49.56

WILLIAM CULPEPPER & ASSOCIATES  
 900 JEFFERSON DRIVE CHARLOTTE NC

CHANNEL STUDY  
 BARNWELL, SOUTH CAROLINA

REFERENCE		CLASS C3	DISPLAY DATES
33 24 29 N		Current rules spacings	DATA 08-12-99
81 16 43 W		CHANNEL 256 - 99.1 MHz	SEARCH 09-12-19

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AD256	256C3	Barnwell	SC	0.0	0.00	152.5	-152.50 *
AD257	257C1	Pembroke	GA	199.9	143.99	143.5	0.49 <
WKXCFM	258C2	Aiken	SC	293.6	65.93	55.5	10.43
WLXC	253A	Lexington	SC	5.0	54.65	41.5	13.15
WAYS	256C1	Macon	GA	251.2	224.97	210.5	14.47
WWKTFM	257C3	Kingstree	SC	75.5	126.52	98.5	28.02
WAFJ	202C2	Belvedere	SC	270.0	52.53	16.5	36.03
WHBZ	259C	Port Royal	SC	145.6	132.93	95.5	37.43
WSPAFM	255C	Spartanburg	SC	334.5	216.51	175.5	41.01
WSPAFM	255C	Spartanburg	SC	334.5	216.53	175.5	41.03
WWBZ	255C2	Mcclellanville	SC	98.7	162.06	116.5	45.56
WYKZ	254C1	Beaufort	SC	165.1	123.66	75.5	48.16
WYKZ.A	254C1	Beaufort	SC	165.1	123.66	75.5	48.16
WYKZ.C	254C1	Beaufort	SC	165.1	123.88	75.5	48.38

BULLIE BROADCASTING CORPORATION

BARNWELL, SOUTH CAROLINA

TABLE 1

STATIONS PROVIDING SERVICE INSIDE THE PRESENT  
60 dBu CONTOUR OF WBAW, BARNWELL, SOUTH CAROLINA

(See Figures 1, 1A and 1B)

FM STATIONS

<u>CALL</u>	<u>CHANNEL</u>	<u>CITY AND STATE</u>
WCOS	248C1	COLUMBIA, SC
WTCB	294C1	ORANGEBURG, SC
WBBQ	282C	AUGUSTA, GA
WHXT	280A	ORANGEBURG, SC
WZNY	289C	AUGUSTA, GA
WAFJ	202C2	BELVEDERE, SC
WAAW	234A	WILLISTON, SC
WWBD	239A	BAMBERG, SC
WYFA	296C3	WAYNESBORO, GA
WIIZ	250C2	BLACKVILLE, SC
WNKT	298C	ST. GEORGE, SC
WDOG	228A	ALLENDALE, SC
WBHC	276A	HAMPTON, SC
WJWJ	210C1	BEAUFORT, SC

AM STATIONS

WRIT	790	BAMBERG, SC
WMXG	740	BARNWELL, SC
WQIZ	810	ST. GEORGE, SC
WSYL	1490	SYLVANIA, GA

BULLIE BROADCASTING CORPORATION

PEMBROKE, GEORGIA

TABLE 2

STATIONS PROVIDING SERVICE INSIDE THE  
PROPOSED WBAW 60 dBu CONTOUR (Figures 2 and 2A)

FM STATIONS

<u>CALL</u>	<u>CHANNEL</u>	<u>CITY AND STATE</u>
WYFA	296C3	WAYNESBORO, GA
WIIZ	250C2	BLACKVILLE, SC
WBHC	276A	HAMPTON, SC
WJWJ	210C1	BEAUFORT, SC
WHKN	235C3	MILLEN, GA
WZBX	293A	SYLVANIA, GA
WQZY	240C1	DUBLIN, GA
WELT	251A	SWAINSBORO, GA
WXRS	263A	SWAINSBORO, GA
WKKZ	224C2	DUBLIN, GA
WDCO	209C	COCHRAN, GA
WMCD	261C2	STATESBORO, GA
WVGS	220A	STATESBORO, GA
WHBZ	259C	PORT ROYAL, SC
WKTM	291A	SOPERTON, GA
WPMX	275C3	STATESBORO, GA
WBMZ	285A	METTER, GA
WYKZ	254C1	BEAUFORT, SC
WYUM	269A	MT. VERNON, GA
WGPH	218C2	VIDALIA, GA
WTCQ	249A	VIDALIA, GA
WCLA	297C3	CLAXTON, GA
WLVH	266C2	HARDEEVILLE, SC
WEAS	226C1	SAVANNAH, GA
WAEV	247C	SAVANNAH, GA
WSVH	216C	SAVANNAH, GA
WJCL	243C	SAVANNAH, GA
WHCJ	212A	SAVANNAH, GA
WIXV	238C1	SAVANNAH, GA
WZAT	271C	SAVANNAH, GA
WYFS	208C1	SAVANNAH, GA
WSCA	231C	SAVANNAH, GA
WRBX	281A	REIDSVILLE, GA
WLYU	265A	LYONS, GA
WMOC	204C2	LUMBER CITY, GA
WVOH	228C2	HAZLEHURST, GA
WBYZ	233C	BAXLEY, GA
WLPT	202C1	JESUP, GA
WSKX	222C2	HINESVILLE, GA
WAJQ	282A	ALMA, GA

BULLIE BROADCASTING CORPORATION

PEMBROKE, GEORGIA

TABLE 2... (continued)

STATIONS PROVIDING SERVICE INSIDE THE  
PROPOSED WBAW 60 dBu CONTOUR (Figures 2 and 2A)

FM STATIONS

<u>CALL</u>	<u>CHANNEL</u>	<u>CITY AND STATE</u>
WIFO	288A	JESUP, GA
WGCO	252C1	MIDWAY, GA
WOKA	294C1	DOUGLAS, GA
WBKF	213A	JESUP, GA
WXVS	211C1	WAYCROSS, GA
WBGA	273C1	WAYCROSS, GA
WWSN	277C	WAYCROSS, GA
WSOL	268C	BRUNSWICK, GA

AM STATIONS

WJAT	800	SWAINSBORO, GA
WPTB	850	STATESBORO, GA
WDMG	860	DOUGLAS, GA
WVOH	920	HAZLEHURST, GA
WWNS	1240	STATESBORO, GA

BULLIE BROADCASTING CORPORATION

WILLACOOCHEE, GEORGIA

TABLE 3

STATIONS PROVIDING SERVICE INSIDE THE  
 PRESENT AND PROPOSED WDMG 60 dBu CONTOURS (Figures 3 and 3A)  
FM STATIONS

<u>CALL</u>	<u>CHANNEL</u>	<u>CITY AND STATE</u>
WQZY	240C1	DUBLIN, GA
WKKZ	224C2	DUBLIN, GA
WDCO	209C	COCHRAN, GA
WGPH	218C2	VIDALIA, GA
WQIL	267C2	CHAUNCEY, GA
WUFF	248A	EASTMAN, GA
WTCQ	249A	VIDALIA, GA
WYUM	269A	MT. VERNON, GA
WQSY	280C3	HAWKINSVILLE, GA
WMCG	285C2	MILAN, GA
WLYU	265A	LYONS, GA
WYSC	274A	McRAE, GA
WRBX	281A	REIDSVILLE, GA
WAEF	212A	CORDELE, GA
WMOC	204C2	LUMBER CITY, GA
WHVL	284C3	HINESVILLE, GA
WDEC	234C3	AMERICUS, GA
WKKN	252A	CORDELE, GA
WVOH	228C2	HAZLEHURST, GA
WBYZ	233C	BAXLEY, GA
WRDO	245A	FITZGERALD, GA
WJIZ	242C1	ALBANY, GA
WJAD	278C3	LEESBURG, GA
WFFM	289A	ASHBURN, GA
WLPT	202C1	JESUP, GA
WIFO	288A	JESUP, GA
WAJQ	282A	ALMA, GA
WULS	279A	BROXTON, GA
WCAA	249A	OCILLA, GA
WRXZ	291A	SYLVESTER, GA
WKAK	283C1	ALBANY, GA
WKZZ	223C3	TIFTON, GA
WOKA	294C1	DOUGLAS, GA
WLPF	253A	OCILLA, GA
WOBB	262C	TIFTON, GA
WQVE	288A	CAMILLA, GA
WPNG	270A	PEARSON, GA
WXVS	211C1	WAYCROSS, GA
WWUF	249A	WAYCROSS, GA
WKUB	286C3	BLACKSHEAR, GA
WMTM	230C1	MOULTRIE, GA

BULLIE BROADCASTING CORPORATION

WILLACOOCHEE, GEORGIA

TABLE 3... (continued)

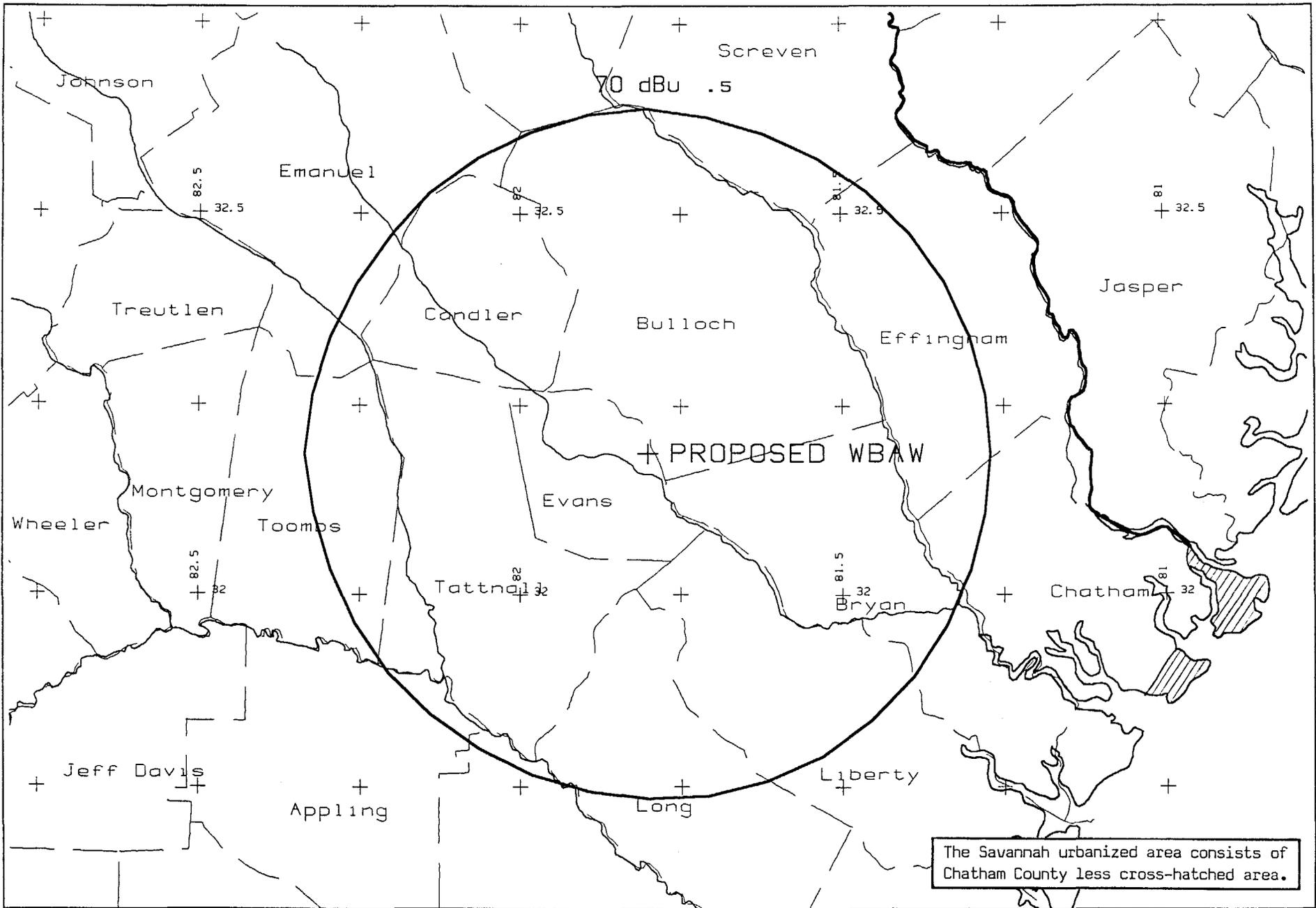
STATIONS PROVIDING SERVICE INSIDE THE  
PRESENT AND PROPOSED WDMG 60 dBu CONTOURS (Figures 3 and 3A)  
FM STATIONS

<u>CALL</u>	<u>CHANNEL</u>	<u>CITY AND STATE</u>
WMGR	247C	BAINBRIDGE, GA
WJYF	237C3	NASHVILLE, GA
WBGA	273C1	WAYCROSS, GA
WWSN	277C	WAYCROSS, GA
WSLE	272A	CAIRO, GA
WYZK	244C2	VALDOSTA, GA
WSOL	268C	BRUNSWICK, GA
WWRR	264C1	BRUNSWICK, GA
WAFT	266C1	VALDOSTA, GA
WWRQ	300C3	VALDOSTA, GA
WSTI	287A	QUITMAN, GA
WAAC	225C1	VALDOSTA, GA
WHLJ	248A	STATENVILLE, GA
WQPW	239C2	VALDOSTA, GA
WIMV	274A	MADISON, FL
WTNT	235C1	TALLAHASSEE, FL
WHTF	285C2	HAVANA, FL
WBZE	255C1	TALLAHASSEE, FL
WGLF	281C	TALLAHASSEE, FL
WQHL	251C2	LIVE OAK, FL

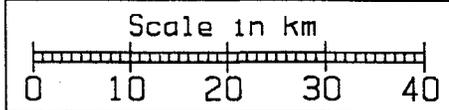
AM STATIONS

WVOH	920	HAZLEHURST, GA
* WDMG	860	DOUGLAS, GA
* WTHV	810	HAHIRA, GA
* WFVR	910	VALDOSTA, GA

\* Figure 3A only



The Savannah urbanized area consists of Chatham County less cross-hatched area.



THE PROPOSED WBAW 70 dBu CONTOUR AND THE SAVANNAH URBANIZED AREA

BULLIE BROADCASTING CORP. PEMBROKE, GEORGIA

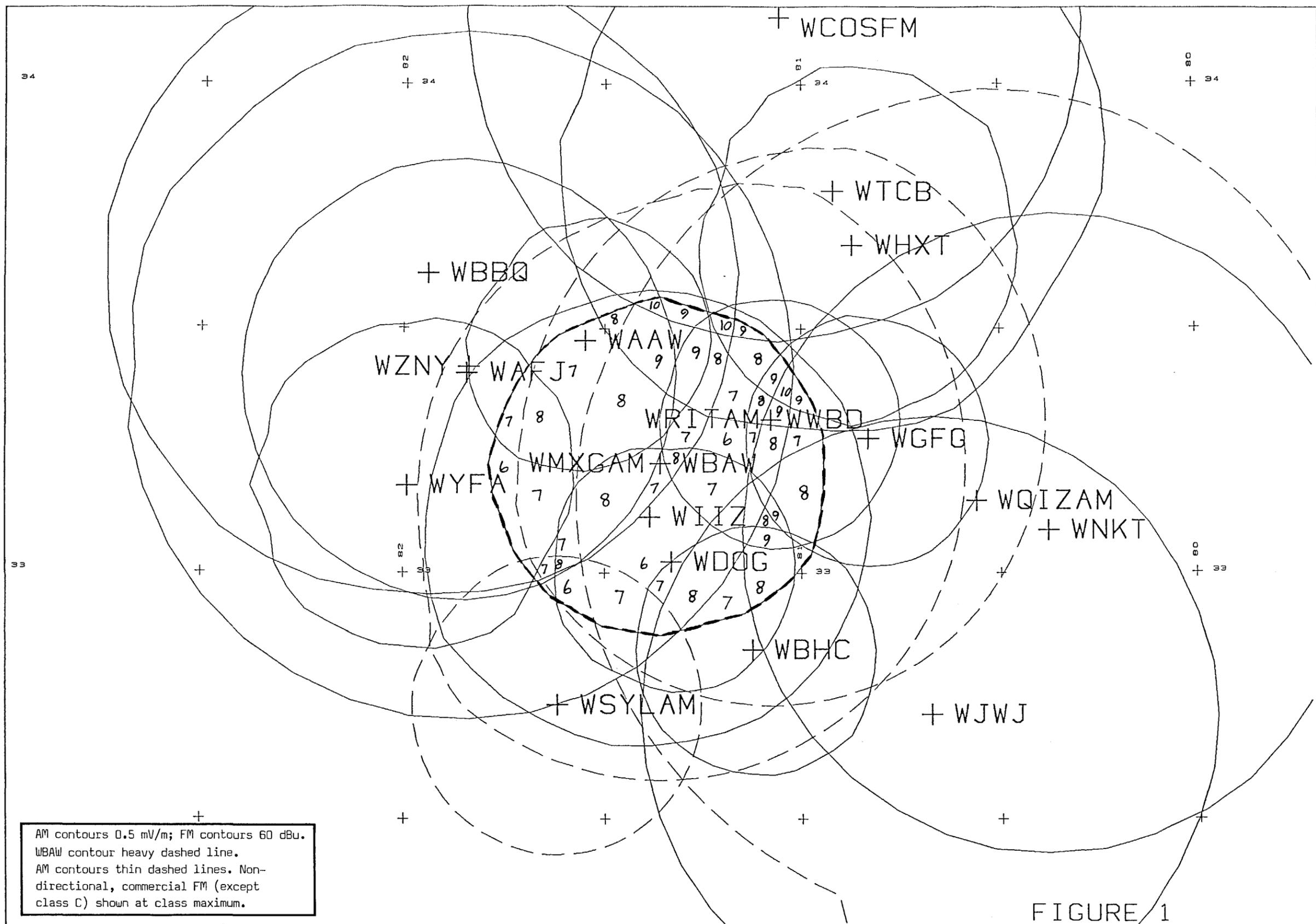
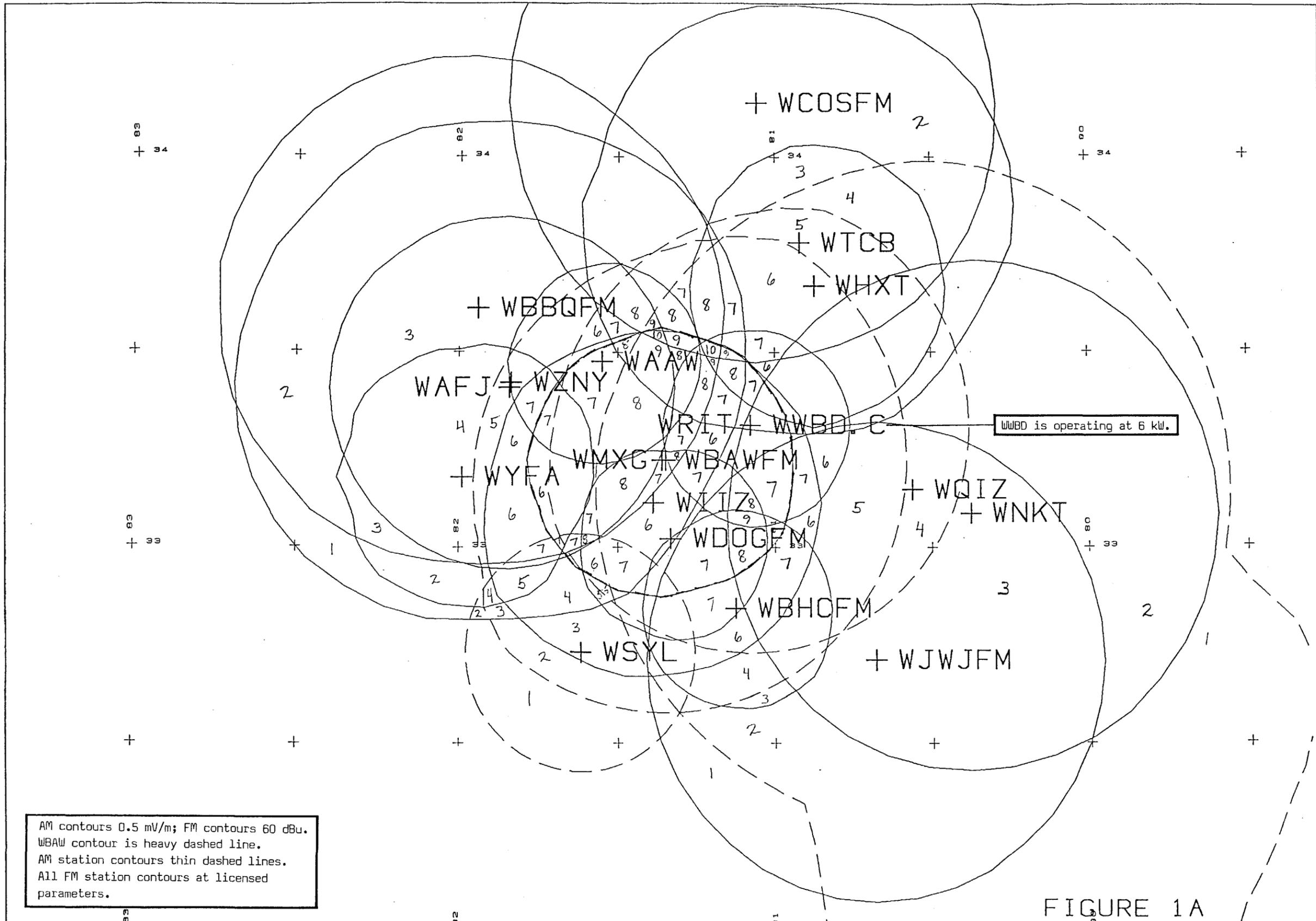
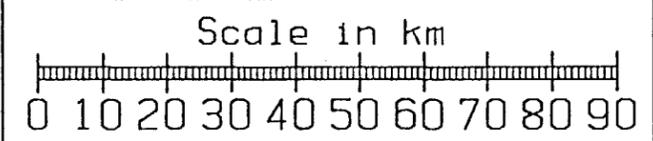


FIGURE 1

<p>Scale in km</p> <p>0 10 20 30 40 50 60 70</p>	<p>EXISTING SERVICES INSIDE THE PRESENT        WBAW 60 dBu CONTOUR AT BARNWELL</p>	<p>BULLIE BROADCASTING CORP.        BARNWELL, SOUTH CAROLINA</p>
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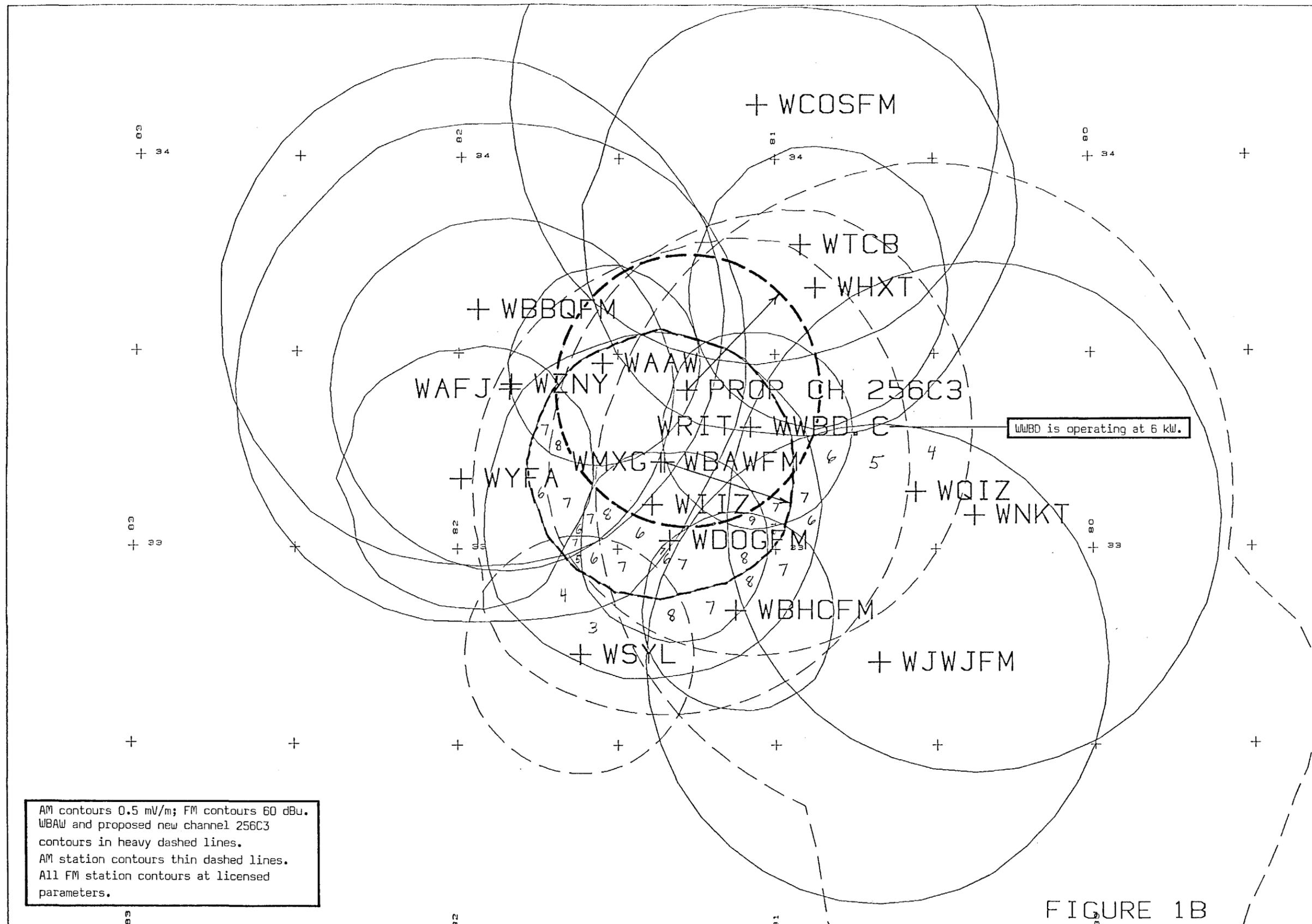
AM contours 0.5 mV/m; FM contours 60 dBu.  
 WBAW contour is heavy dashed line.  
 AM station contours thin dashed lines.  
 All FM station contours at licensed parameters.



EXISTING SERVICES INSIDE THE PRESENT  
 WBAW 60 dBu CONTOUR AT BARNWELL

BULLIE BROADCASTING CORP.  
 BARNWELL, SOUTH CAROLINA

FIGURE 1A



AM contours 0.5 mV/m; FM contours 60 dBu.  
 WBAW and proposed new channel 256C3  
 contours in heavy dashed lines.  
 AM station contours thin dashed lines.  
 All FM station contours at licensed  
 parameters.

WABD is operating at 6 kW.

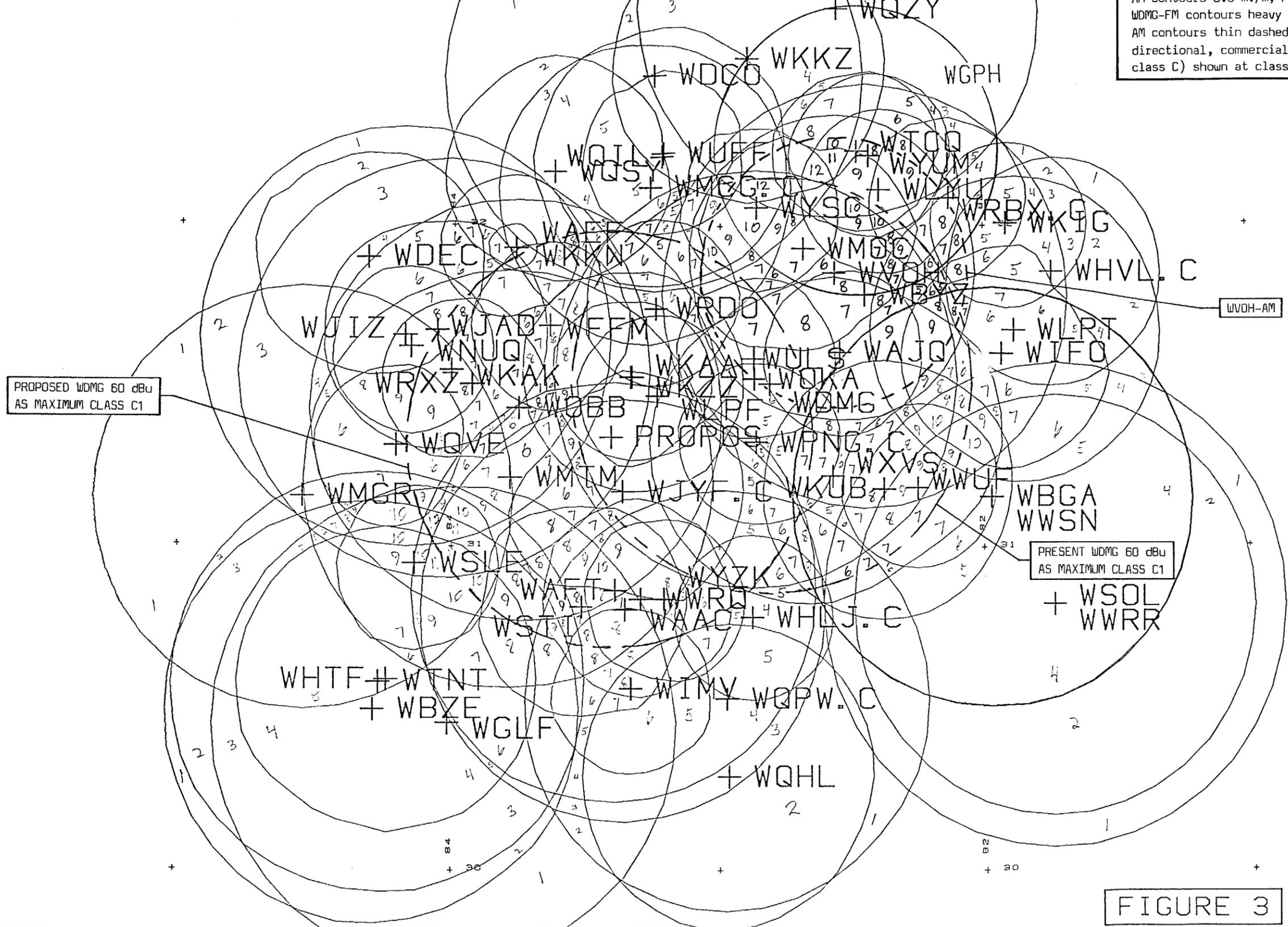
FIGURE 1B

<p>Scale in km</p> <p>0 10 20 30 40 50 60 70 80 90</p>	<p>WBAW 60 dBu CONTOUR AND PROPOSED CH          256C3 ALLOTMENT WITH REMAINING SERVICES</p>	<p>BULLIE BROADCASTING CORP.          BARNWELL, SOUTH CAROLINA</p>
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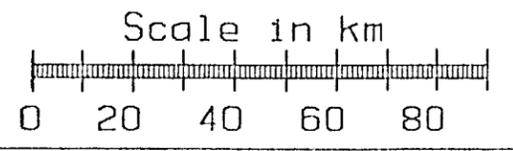
AM contours 50 dBu, FM contours 60 dBu.  
 WDMG-FM contours heavy dashed lines.  
 AM contours thin dashed lines. Non-  
 directional, commercial FM (except  
 class C) shown at class maximum.



PROPOSED WDMG 60 dBu  
 AS MAXIMUM CLASS C1

PRESENT WDMG 60 dBu  
 AS MAXIMUM CLASS C1

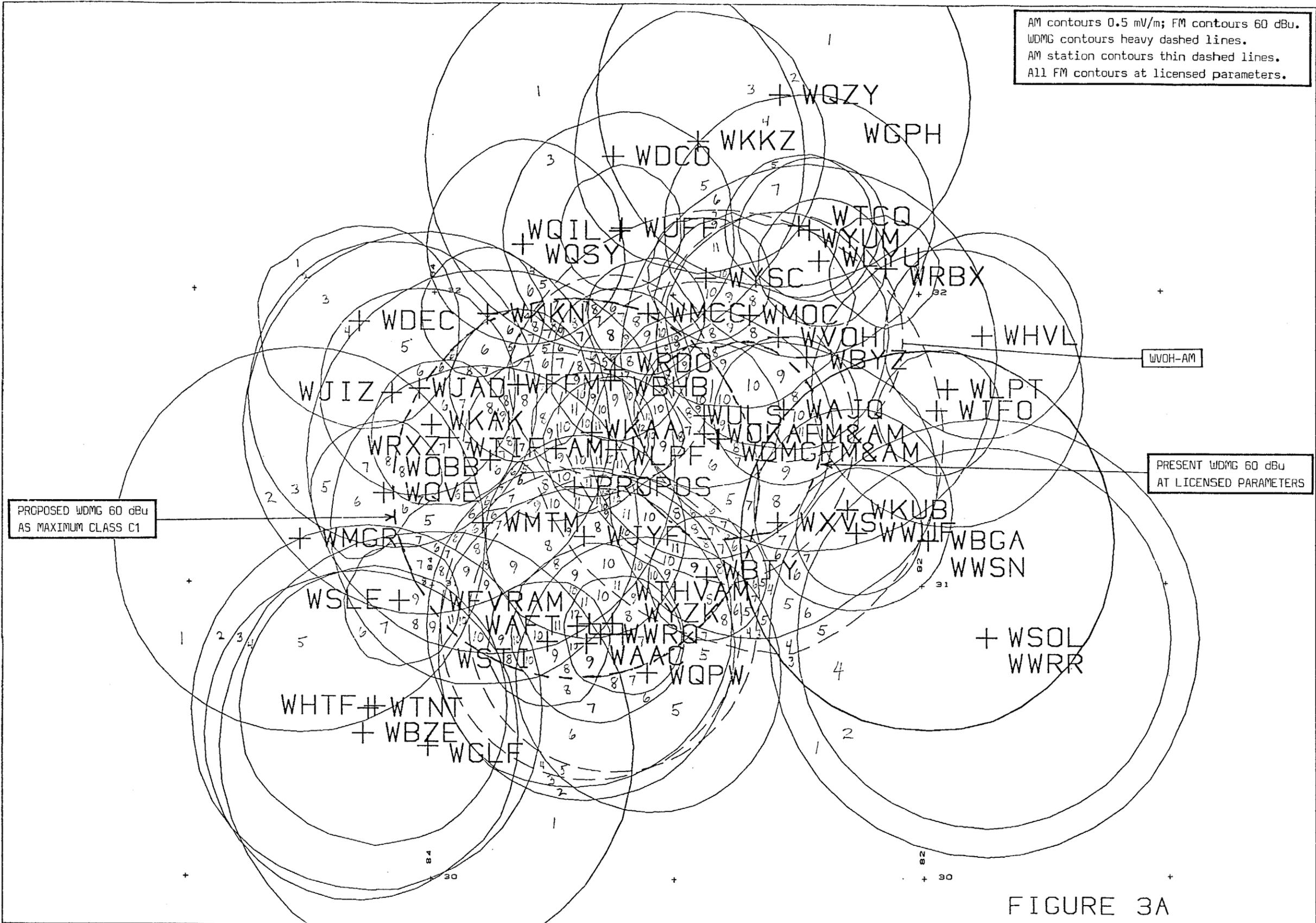
FIGURE 3



EXISTING SERVICES INSIDE THE PRESENT  
 AND PROPOSED WDMG 60 dBu CONTOURS

BULLIE BROADCASTING CORPORATION  
 WILLACOOCHEE, GEORGIA

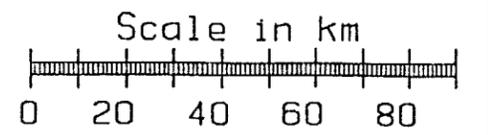
AM contours 0.5 mV/m; FM contours 60 dBu.  
 WDMG contours heavy dashed lines.  
 AM station contours thin dashed lines.  
 All FM contours at licensed parameters.



PROPOSED WDMG 60 dBu  
 AS MAXIMUM CLASS C1

WVOH-AM

PRESENT WDMG 60 dBu  
 AT LICENSED PARAMETERS



EXISTING SERVICES INSIDE THE PRESENT  
 AND PROPOSED WDMG 60 dBu CONTOURS

BULLIE BROADCASTING CORPORATION  
 WILLACOOCHEE, GEORGIA

PRESENT WBAW AREA 4688 SQ KM  
PRESENT WBAW POPULATION 60,258

+ PRES WBAW

PROPOSED WBAW AREA 16,421 SQ KM  
PROPOSED WBAW POPULATION 462,251

+ PROP WBAW

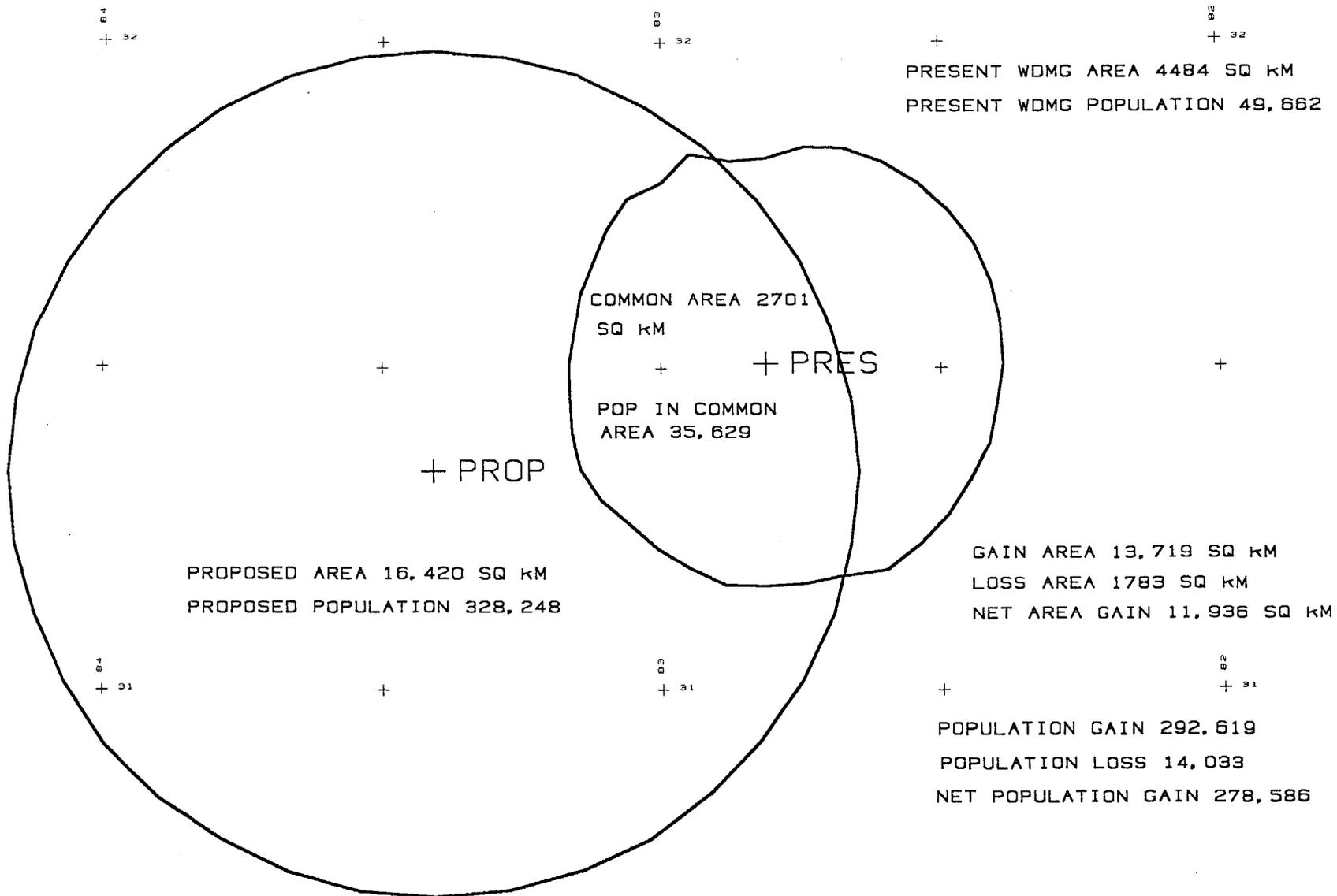
NET AREA GAIN 11,733 SQ KM  
NET POPULATION GAIN 401,993

FIGURE 4



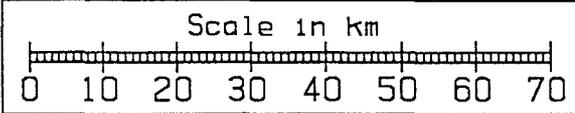
THE PRESENT AND PROPOSED WBAW  
60 dBu CONTOURS, AREAS AND POPULATIONS

BULLIE BROADCASTING CORP.  
BARNWELL, SC/PEMBROKE, GA



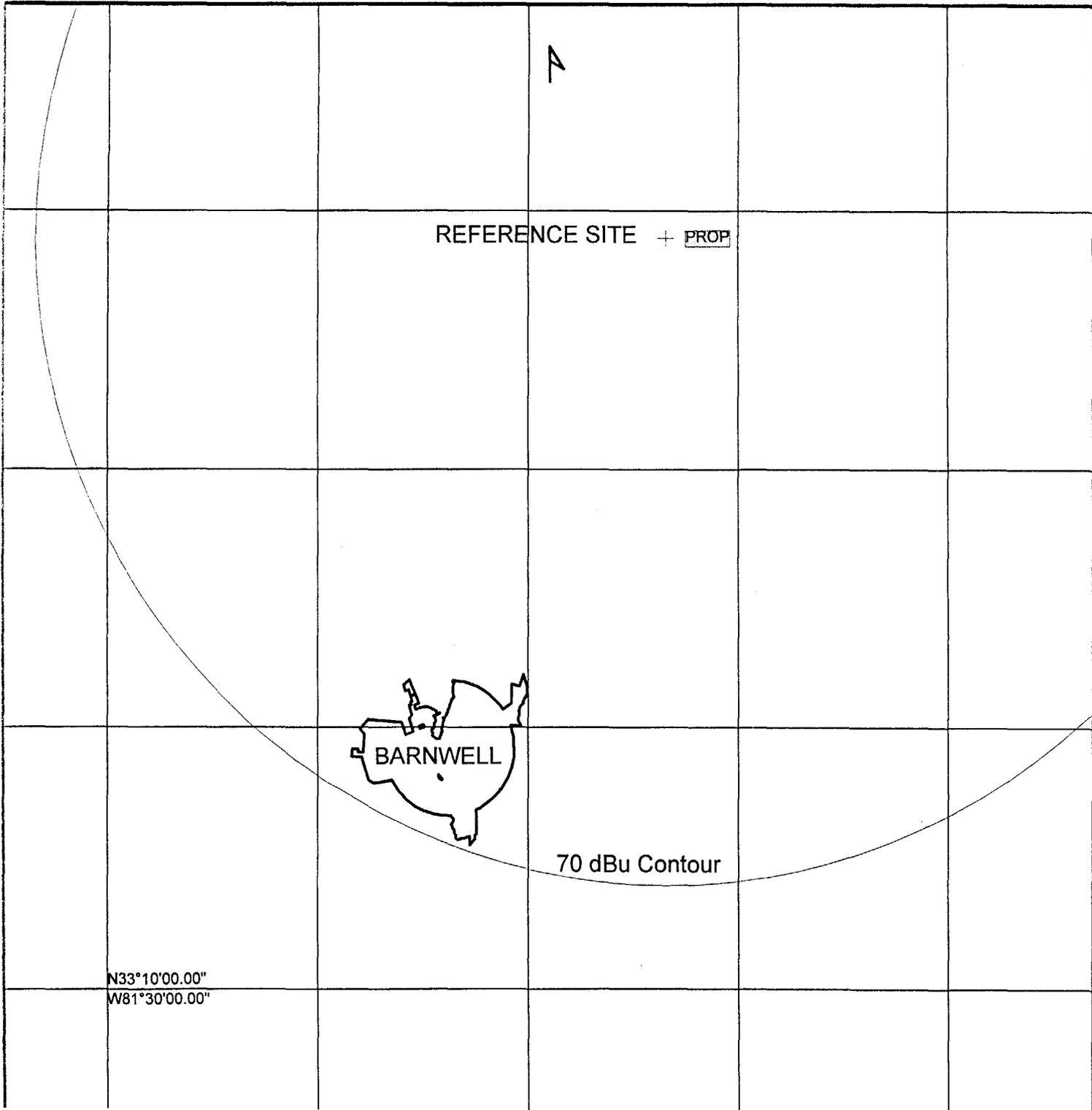
1:1,000,000

FIGURE 5



THE PRESENT AND PROPOSED WDMG  
60 dBu CONTOURS, AREAS AND POPULATIONS

BULLIE BROADCASTING  
WILLACOOCHEE, GA



AMW™: BARNMAP.am

Reference Grid (spacing: 5')

Field strength at remote

■ = 0.001 mV/m

Display threshold level: -120.0 dBmW

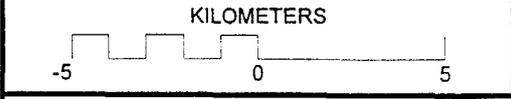
C:\test\BILLY1.bna

Sites

Call sign: PROP Power: 25.000 kW

Pattern: ND-D Frequency: 991 kHz

Coordinates: N33°24'29.00" W81°16'43.00"



**FIGURE 6**  
 MAP OF THE REFERENCE  
 SITE, BARNWELL AND THE 70 dBu CONTOUR

N33°10'00.00"  
 W81°30'00.00"

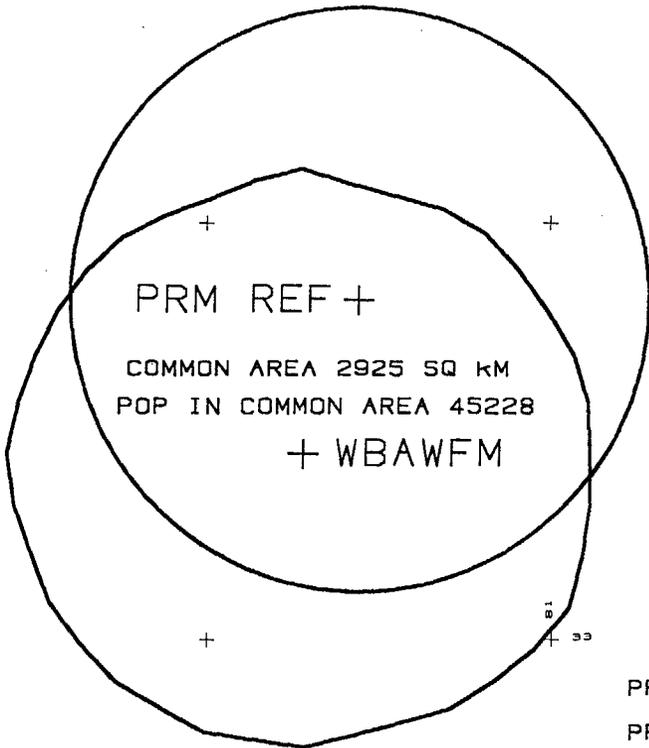
PROPOSED SITE IS AT PRM REFERENCE.

DISTANCE TO PROPOSED CONTOUR IS UNIFORM 39 KM.

+ + 34 + + 34 + + 34

PROPOSED CHANNEL 256C3 AREA 4778 SQUARE KM  
PROPOSED CHANNEL 256C3 POPULATION 81,477

+ + + + +



GAIN AREA 1853 SQ KM  
LOSS AREA 1763 SQ KM  
NET AREA GAIN 90 SQ KM

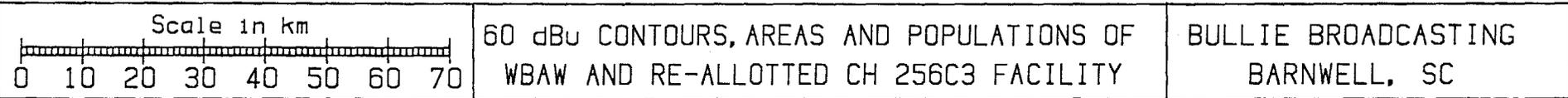
POPULATION GAIN 36,249  
POPULATION LOSS 15,030  
NET POPULATION GAIN 21,219

+ + 33 + 33 + + 33 + + 33

PRESENT WBAW AREA 4688 SQUARE KM  
PRESENT WBAW POPULATION 60,258

1:1,000,000

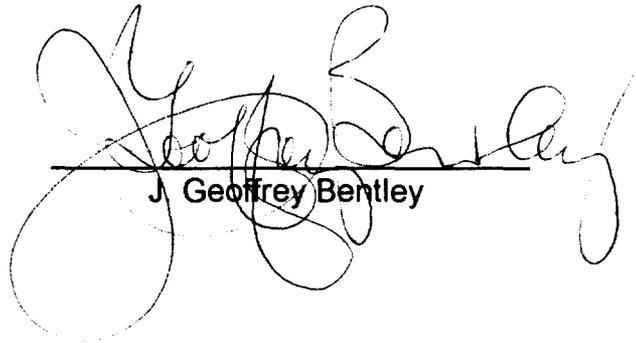
FIGURE 7



**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to Section 1.420(f) of the Rules, a copy of the foregoing Petition for Rulemaking was served, this 14th day of October 1999, by first-class United States mail, postage-prepaid, on the licensee of WDMG-FM, Douglas, Georgia, addressed to:

Raymond Firment, President  
Jumbo Thing, Inc.  
Radio Station WDMG-FM  
620 East Ward Street  
Douglas, GA 31533



J. Geoffrey Bentley