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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

In the Matter of)
)
Amendment of 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Greenwood and Mauldin, SC))

MM Docket No. 99-313
RM-9753

To: Sharon P. McDonald
Allocations Branch
Mass Media Bureau

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PETITIONER'S COMMENTS

Pursuant to 47 CFR 1.420(g), Petitioner Sutton Radiocasting Corporation ("SRC"), licensee of station WCRS (FM), Greenwood, SC, respectfully submits these Comments in response to the FCC's NPRM, Docket No. 99-313, DA 99-2272, released October 22, 1999, which proposes to amend the FM Table of Allotments (i) to reallocate channel 244A from Greenwood to Mauldin, SC as that city's "first local aural transmission service" and (ii) to modify the license of station WCRS (FM) accordingly. See Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990).

1. The NPRM notes that the proposed reallocation of channel 244A from Greenwood to Mauldin, SC in order to provide a "first local aural service" would be prima facie in the public interest. Id. at para. 1. Indeed, Mauldin has an uncommonly strong need for the reallocation of channel 244A as a "first local service." That need far outweighs any interest in keeping channel 244A as a fifth (5th) local service at Greenwood, SC.

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2. Mauldin, an incorporated city with a panoply of governmental services, had 1990 Census population of 11,662 persons -- up 41% from its 1980 Census population. Indeed, Mauldin's growth -- and its need for a local broadcast service -- appears to be accelerating. City Clerk, Cindy Miller, confirms that the current population of Mauldin is over 16,000. ^{1/} Mauldin not only has a mayor, city council, its own sewer department, its own police and fire departments and city library, but also is home to over 300 industries; its 107 retail businesses, employing more than 1,259 persons, generate an annual payroll of nearly \$12 million. See Appendix A at 2. It also has 21 wholesale businesses, which have an annual payroll of over \$4 million. Id. Mauldin's largest employers are Kemet Electronics Corp (4900 employees) and the Bi-Lo Grocery Chain (2100 employees).

3. Mauldin's "market area" includes over 330,000 persons. Id. Its per capita income is the highest in Greenville County, SC. Id. In short, Mauldin serves as the gateway to the Golden Strip, one of the fastest growing and most affluent areas of the Southeast.

4. Mauldin has numerous civic organizations -- such as the Lions Club, two Rotary Clubs and the Mauldin Economic Development Committee -- and a dozen churches. ^{2/} It has three city parks,

^{1/} Phone interview with City Clerk by undersigned counsel on December 8, 1999. See also Appendix A.

^{2/} Id.

a senior recreational facility and numerous tennis courts and soccer fields. It hosted the 1995 Dixie World Series.

5. Moreover, Mauldin currently has no local media for local self-expression on public issues -- such as the worsening traffic congestion. Not only is there no local broadcast station, there is not even a daily or even weekly newspaper published in Mauldin.^{3/}

6. In addition, the reallocation of channel 244A to Mauldin would result in WCRS-FM's service becoming available to a greater number of listeners. See Engineering Statement, attached as Appendix B.

7. Additionally, the reallocation of channel 244A to Mauldin would result in FM service to the fastest growing of the two, relatively equal-sized cities. Mauldin has grown approximately 42 percent since 1990,^{4/} while Greenwood's current population has declined since 1990.^{5/}

8. Furthermore, the reallocation of channel 244A to Mauldin would by no means deprive Greenwood of its "sole" local aural service. To the contrary, that city still would be "well served" by (i) another full-time FM station (WZSN-FM), (ii) a full-time AM station, and two daytimer AM stations. Given the strong need

^{3/} Id.

^{4/} See paragraph 2, supra.

^{5/} The Greenwood Region Economic Development Alliance estimates that the population of Greenwood, SC had dropped to less than 20,000 by July 1998.

of Mauldin for a "first local service," the public interest greatly favors the reallocation of "one" of Greenwood's several radio stations. Cf. Marysville and Hilliard, Ohio, Report and Order, Docket No. 98-123, released October 29, 1999.

9. In addition, the "loss" of channel 244A will not leave the Greenwood area "underserved." See Engineering Statement, attached as Appendix B ("loss" area is well served). Indeed, "every person residing within the proposed loss area will continue to receive at least five full-time aural reception services." Id. at 3.

9. Additionally, no other commercial FM channel is available for allotment at Mauldin. See Appendix B. Thus, unless Petitioner's proposal is granted and the requested re-allotment is made, the fast-growing community of Mauldin will be foreclosed from having the local transmission service that it so badly needs.

10. Finally, the reallocation of channel 244A (WCRS-FM) to the needy city of Mauldin, SC, will not deprive Greenwood of one of its media "voices." Petitioner not only is the owner of WCRS-FM but also owns full-time WCRS-AM, an award-winning radio station that has served Greenwood since 1941.^{6/} Indeed, Petitioner's WCRS-AM is Greenwood's only 24-hour AM radio station and the only Greenwood radio station with a local news staff. That

^{6/} WCRS-AM has been honored in recent years by the Greenwood Area Chamber of Commerce, the Salvation Army, the United Way of Greenwood and the Greenwood Kiwanis Club for its outstanding public service.

award-winning media "voice" will continue to be heard in Greenwood, even after WCRS-FM, channel 244A, is reallocated to Mauldin.

In sum, the reallocation of channel 244A to Mauldin, SC will result in a preferential arrangement of allotments, inasmuch as Priority (3) -- first local service at Mauldin, SC -- prevails in this case over Priority (4) -- other public interest factors, such as the retention of a "fifth" local aural service at Greenwood. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992). ^{2/}

Respectfully submitted,



Robert Lewis Thompson
TAYLOR THIEMANN & AITKEN, L.C.
908 King Street, Suite 300
Alexandria, VA 22314
(703) 836-9400

Counsel for SRC

December 13, 1999

^{2/} Should channel 244A be reallocated to Mauldin, SC, Petitioner will file an application and, after it is authorized, will promptly construct the new facility.

APPENDIX A

DEMOGRAPHIC DATA FOR MAULDIN, SC



Government

Mauldin has a responsive Council form of government. The six councilmembers and mayor are all elected at-large. Councilmembers serve four-year terms. The day-to-day operations of the City are the responsibility of the full-time City Administrator and a professional city staff.

Among the various services provided by the City are police and fire protection; economic development, zoning and code enforcement; sanitation and recycling pick up; and recreation programs. Many of these services are rated highly by the residents of Mauldin.

Local Taxes: In addition to its quality municipal services, Mauldin has strived to maintain a reasonable level of local taxation. The City has further encouraged a sound economic climate by maintaining low tax rates and service fees. Below is a breakdown of tax computation on an average \$100,000 market value home:

Property value = \$100,000

Assessed value is calculated as follows:

- 4% of value for residential
- 6% of value for commercial
- 10.5% of value for industrial

The average City of Mauldin tax for all services is 54.5 mills.

So a \$100,000 residence would pay an estimated:				
Tax District	Mauldin Millage	Mauldin City Tax	County Millage	County Taxes
City of Mauldin	54.5	\$ 218.00	0.0	\$ 0.00
Greenville County	55.9	\$ 223.60	55.9	\$223.60
School District	125.6	\$ 502.40	125.6	\$502.40
Greenville Tech	5.9	\$ 23.60	5.9	\$ 23.60
Library	7.8	\$ 31.20	7.8	\$ 31.20
Art Museum	1.3	\$ 5.20	1.3	\$ 5.20
Metro Sewer Dist. Bond	0.5	\$ 2.00	6.0	\$ 24.00
Memorial Auditorium	1.0	\$ 4.00	1.0	\$ 4.00
Hospital System	2.0	\$ 8.00	2.0	\$ 8.00
County Recreation	0.2	\$ 0.00	4.6	\$ 18.40
Fire Service District	0.0	\$ 0.00	18.0	\$ 72.00
Total Taxes	252.5	\$ 1010.00	226.1	\$904.40

State Taxes: The State of South Carolina is where most taxes originate. In addition to income tax, the state issues a 5% sales tax, road and highway taxes on gasoline and several other fees and taxes too numerous to enumerate. The State of South Carolina also offers businesses several incentives for new business development and existing business expansion. Information on these programs can be obtained by contacting the Governor's Office.

City Services:

General Government: The City of Mauldin has a Council form of government with six main departments: administration, police, fire, recreation, sanitation, and streets. An administrator is responsible for day-to-day functions of all city. With seven part-time elected and a full-time administrator, the City of Mauldin is small enough to be accessible to its residents. With less bureaucracy, public concerns are addressed quickly.

Police: City police have an average emergency response time of less than five minutes compared to the County Sheriff's time of 12 minutes. Manpower is also a critical advantage for City residents with 2.22 city officers per 1,000 residents v .77 sheriff's deputies per 1,000 residents.

Fire: The Mauldin Fire Department service area provides its residents with tremendous insurance savings. Residents and businesses outside the city limits have a class 9 insurance rating for buildings more than 1,000 feet from a hydrant. For City property owners, the City's class 3 rating means an average of \$383.00 for a newly constructed \$100,000 home. Several prevention programs also ensure this high rating is protected.

Sewers: The City owns fifty plus miles of sewer line. Twenty-four hour, seven-day per week service is provided on city-owned lines.

Streets: As a member of the pothole busters, the City is committed to the repair of potholes within 72 hours of the report.

Street Lights: Street lights are also funded by the City in residential areas and most commercial areas.

Sanitation: Residents enjoy weekly pick up of garbage as well as a successful recycling program. Seasonal leaf pick up is available.

Population Growth:

1970.....	3,797
1980.....	8,245
1990.....	11,662
1995.....	13,237
1998.....	14,682
2000.....	16,719

Population:

- High School graduates make up 88.3%
- College graduates make up 38.7%
- Mauldin's planning area has 19,503
- Mauldin High School 1994 average SAT score was 919; this was 17 higher than the national average.

Income:

- Per Capita income is \$16,273 which is the highest in Greenville County.
- Median family income is \$45,990 which is also the highest in the County.

- 60.4% of all Mauldin households have a minimum annual income of \$35,000.

Market Area:

- Mauldin's market area within a ten-mile radius includes 336,267.
- Mauldin currently has 107 retail businesses employing more than 1,259 persons and an annual payroll of \$11,857,000.
- Mauldin has 21 wholesale businesses employing 206 persons and an annual payroll of \$4,326,000.

Traffic Counts:

- Laurens Rd between Butler and Old Laurens.....30,704
- Laurens Road between I-85 & Butler Road.....25,802
- Butler Avenue between Bridges Road and Laurens Road.....13,673
- Butler Avenue between Laurens Road & Ridge Road.....19,950

Housing Starts:

- Housing starts for 1994.....123
- Housing starts through 10/31/95.....167

Building Permits:

- The building department issued 1206 permits totaling \$252,420.74.

Mauldin, SC 29662
Phone/Fax: (803) 297-1323

Building Permit Valuation History:

1991.....	\$5,647,874
1992.....	\$7,532,882
1993.....	\$10,364,735
1994.....	\$22,199,613
1995.....	\$24,001,731
1996.....	\$29,476,127

Municipal Tax Rates:

Although there are seven municipalities in Greenville County who charge property tax, Mauldin's is significantly lower than most of the rapidly growing communities in the county. Combined with county levies, Mauldin is lower than six other municipalities in total millage assessed (see county valuation sheet).

City of Greenville.....	98.9
City of Travelers Rest.....	91.5
City of Greer.....	87.1
Unincorporated Mauldin areas.....	67.0
City of Mauldin.....	50.0

Per Capita Income:

1. Mauldin.....	\$16,273
2. Greenville.....	\$14,708
3. Simpsonville.....	\$13,698
4. Fountain Inn.....	\$12,562
5. Travelers Rest.....	\$10,341

Family Median Income:

1. Mauldin.....	\$45,990
2. Simpsonville.....	\$40,059
3. Greenville County.....	\$34,560
4. Greenville.....	\$30,997
5. Fountain Inn.....	\$30,525
6. Travelers Rest.....	\$28,321

For more information call:

City of Mauldin
5 E. Butler Road
P.O. Box 249
Mauldin, SC 29662
Phone: (864) 288-4910
Fax: (864) 297-3411

- or -

Mauldin Chamber of Commerce
110 East Butler Road
P.O. Box 645

APPENDIX B
ENGINEERING EXHIBIT

**ENGINEERING STATEMENT
IN SUPPORT OF
COMMENTS TO NOTICE OF
PROPOSED RULE MAKING**

December 10, 1999

Sutton Radiocasting Corporation
Station WCRS-FM
FM Channel 244A □ 96.7 Megahertz
Greenwood and Mauldin, South Carolina
MM Docket No. 99-313, RM-9753



LAWRENCE L. MORTON ASSOCIATES
2867 BELDEN DRIVE
HOLLYWOOD HILLS, CALIFORNIA 90068-1901
(323) 467-5010 / FAX (323) 467-5848

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EXHIBIT E-1

ENGINEERING STATEMENT

The information and data contained within these engineering exhibits were prepared on behalf of Sutton Radiocasting Corporation ("Sutton"), licensee of FM broadcast station WCRS-FM, FCC File No. BLH-920109KC, in support of comments to *Notice of Proposed Rule Making*, MM Docket No. 99-313, RM-9753, released October 22, 1999.

In Paragraph B of the *Notice*, the Commission requested additional information from the petitioner concerning existing aural broadcast services within the proposed gain and loss areas. This report serves to address these issues and provide the requested information.

Exhibit E-2 is a map showing the WCRS-FM licensed 60 dB μ service contour at Greenwood and the 60 dB μ contour from a hypothetical Class A facility at the proposed allotment reference site for Channel 244A at Mauldin.

I. METHODS

For each FM station presented in these exhibits, terrain elevation data from three to sixteen kilometers on radials spaced at one-degree azimuthal intervals, starting with True North, were extracted from topographic data obtained from the computerized Defense Mapping Agency three arc-second point elevation database. Along each radial 261 points were linearly interpolated according to the requirements of § 73.312(d). The height above average terrain along each of the 360 radials was computed by averaging the elevations between three and sixteen kilometers below the antenna radiation center in accordance with § 73.313(d)(3).

The locations of the 60 dB μ F(50,50) service contours were determined using computer methods outlined in F.C.C. publication PB-249144, *Field Strength Calculations for TV And FM Broadcasting*. These computer methods use digitized data taken from the graph of § 73.333 Figure 1. Intermediate values are obtained using bivariate interpolation techniques for surface fitting.

For non-Class C FM stations operating at less than maximum facilities, technical parameters were based on maximum facilities for the class of station under study. In the case of Class C stations, either the actual operating parameters or a minimum 300-meter height above average terrain and 100-kW effective radiated power was assumed, whichever is greater.

Technical data for AM broadcast stations were obtained from the latest version of the FCC AM Engineering Database. Soil conductivities used in the determination of distances to the nighttime interference-free contours were derived from the computerized FCC M-3 soil conductivity database. Conductivity data were extracted for every one degree of azimuth.

For stations employing directional antenna systems, the Standard Radiation using the theoretical operating parameters contained within the AM Engineering Database was computed and used for inverse field strength. In the case of nondirectional stations, the effective field strengths at one kilometer were employed. In accordance with § 73.183(e), the "equivalent-distance" (Kirke) method was used to determine the distances to the nighttime interference-free contours where more than one conductivity zone exists over the path length.

Pursuant to established Commission policy, full-time AM reception service is defined by the station's nighttime interference-free contour for non-Class A stations, and by the 0.5 mV/m groundwave contour for Class A stations. Nighttime interference studies were performed for all full-time AM facilities within the vicinity of the WCRS-FM 60 dB μ contour to determine those AM stations that provide nighttime interference-free service to the area.

Population figures for the areas within the contours were obtained through use of the computerized *1990 Census of Population and Housing Public Law 94-171 Data* made available by the U.S. Department of Commerce, Bureau of the Census. The census counts were taken down to the block level for maximum accuracy and resolution. There are approximately seven million block level records in the database. When the centroid coordinates of a census block fell within the contour the entire population associated with the block was assumed to reside within the contour. When the centroid fell outside the contour no portion of the population was counted.

The areas within the contours were computed using numerical integration employing the computed distances to the contours for each degree of azimuth. Distances to contours along intermediate azimuths were obtained mathematically by piecewise third-order polynomial approximations.

In cases where a station had a licensed and authorized facility, the contours were based on the authorized facility.

II. LOSS AREA

A study was conducted to determine the number of AM and FM stations that provide full-time aural broadcast service to the area contained within the WCRS-FM 60 dB μ service contour at Greenwood. Exhibits E-2 and E-3 show in pink shading the

portion of the WCRS-FM service contour at Greenwood that will become loss area by adoption of the proposed principal community change.

Also studied were the 60 dB μ contours of all FM stations in the area to determine those that provide some overlap to the loss area within the WCRS-FM contour at Greenwood. Exhibit E-5 is a tabulation of the stations that provide aural broadcast reception within the proposed loss area of the WCRS-FM facility at Greenwood.

Exhibit E-3 shows the WCRS-FM service contours from the Greenwood and Mauldin facilities, and the service contours of the AM and FM stations that provide full-time aural service within the proposed gain and loss areas. Exhibit E-4 tabulates the land areas and populations within identified regions subject to loss by ascending number of full-time aural broadcast services that serve each area.

The results of this study indicate that the proposed change in principal community will not create any white or gray areas. In fact, *every person residing within the proposed loss area will continue to receive at least five full-time aural reception services.*

III. GAIN AREA

The same type of study was performed to determine the number of existing full-time aural broadcast reception services within the WCRS-FM proposed gain area at Mauldin. Exhibit E-7 tabulates a list of contributing stations to the gain area. Exhibit E-6 lists the areas and populations served by existing stations within the proposed gain area.

Exhibits E-2 and E-3 show in green shading the portion of the WCRS-FM service contour at Mauldin that is the gain area created by adoption of the proposed principal community change.

IV. CONCLUSIONS

In conclusion, the following salient facts result from the outcome of the aforementioned analysis, and information provided by the petitioner in its original filing.

- The proposed loss area will be left with no fewer than five full-time aural reception services.
- Establishment of Channel 244A at Mauldin will provide the community with its first local full-time aural broadcast service.

- No other commercial FM channel is available for allotment at Mauldin as an alternative to Channel 244A.
- The proposed gain and loss areas are already well served under the Commission's criteria.
- Greenwood will be left with two aural broadcast services upon allotment of Channel 244A to Mauldin.

The petitioner reaffirms its intention to apply for Channel 244A at Mauldin if it is allotted and, if authorized, to build the requested facility promptly.

**Lawrence L. Morton, P.E.
Consulting Engineer to Sutton Radiocasting Corporation
December 10, 1999**



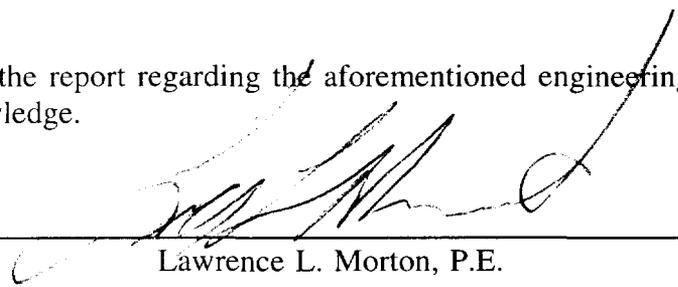
AFFIDAVIT

State of California)
)
County of Los Angeles) **ss:**

Lawrence L. Morton, being first duly sworn upon oath, deposes and says:

- That he is a qualified engineer,
- That he is a Registered Professional Engineer in the State of California,
- That he is a member of the Association of Federal Communications Consulting Engineers,
- That his qualifications are a matter of record with the Federal Communications Commission,
- That he has prepared many broadcast applications and engineering exhibits that have been filed with and granted by the Federal Communications Commission,
- That he has carried out such engineering work and that the results thereof are attached hereto and form part of this affidavit, and
- That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge.

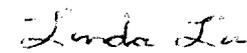
Date: December 10, 1999



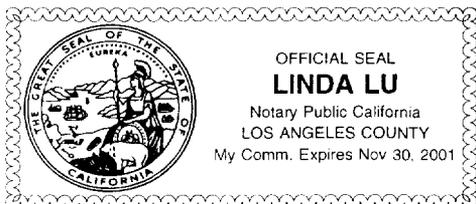
Lawrence L. Morton, P.E.

On December 10, 1999, before me, Linda Lu, a Notary Public, in and for the State of California, personally appeared Lawrence L. Morton known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

My Commission expires 11/30/2001



Notary Public

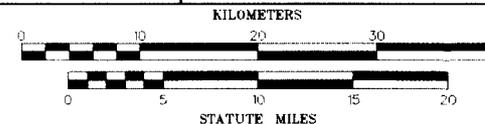


Lambert Azimuthal Equal-Area

15' 00" Graticule Spacing

CENTER OF MAP:
N LAT 34° 27' 31.00"
W LON 81° 56' 51.00"
Scale 1 : 644,291

EXHIBIT E-2
WCRS-FM LICENSED AND PROPOSED
60 DBU SERVICE CONTOURS
PROPOSED GAIN AREA



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Hollywood Hills, California

Proposed Gain Area

WCRS-FM LICENSED 60 DBU CONTOUR

Proposed Loss Area

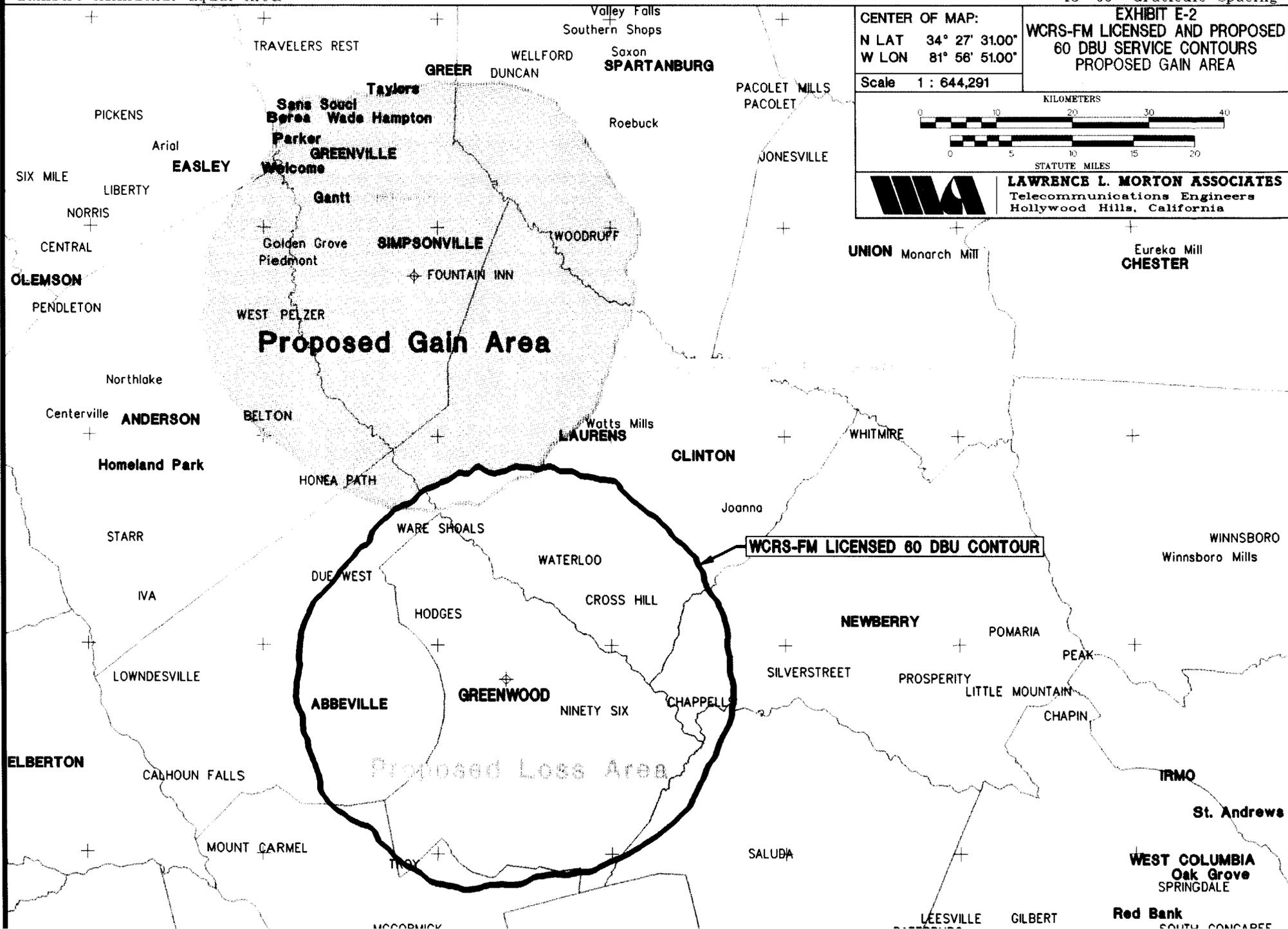


EXHIBIT E-4
OTHER AURAL SERVICES WITHIN WCRS-FM
PROPOSED LOSS AREA AT GREENWOOD

Sutton Radiocasting Corporation
December 1999

NUMBER OF STATIONS SERVING THIS AREA	LAND AREA			POPULATION	
	SQUARE KILOMETERS	SQUARE MILES	% OF LOSS AREA	1990 CENSUS POPULATION	% OF LOSS AREA
0	0.00	0.00	0.00	0	0.00
1	0.00	0.00	0.00	0	0.00
2	0.00	0.00	0.00	0	0.00
3	0.00	0.00	0.00	0	0.00
4	0.00	0.00	0.00	0	0.00
5	184.07	71.07	7.46	1,842	2.26
6	350.00	135.14	14.19	13,573	16.68
7	616.47	238.02	24.99	18,564	22.82
8	297.29	114.78	12.05	8,098	9.95
9	256.56	99.06	10.40	18,344	22.55
10	183.04	70.67	7.42	8,778	10.79
11	164.26	63.42	6.66	2,622	3.22
12	235.83	91.06	9.56	3,412	4.19
13	103.50	39.96	4.20	3,481	4.28
14	76.17	29.41	3.09	2,649	3.26
15	0.00	0.00	0.00	0	0.00
16	0.00	0.00	0.00	0	0.00
17	0.00	0.00	0.00	0	0.00
18	0.00	0.00	0.00	0	0.00
19	0.00	0.00	0.00	0	0.00
20	0.00	0.00	0.00	0	0.00
21	0.00	0.00	0.00	0	0.00
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
TOTALS:	2,467.21	952.59	100.0 %	81,363	100.0 %

EXHIBIT E-5
STATIONS PROVIDING OTHER AURAL BROADCAST SERVICES
WITHIN WCRS-FM PROPOSED LOSS AREA AT GREENWOOD

Sutton Radiocasting Corporation
December 1999

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
1	WEPC(FM)	BELTON	SC	88.5 MHz
2	WLJK(FM)	AIKEN	SC	89.1
3	WLFJ(FM)	GREENVILLE	SC	89.3
4	WEPR(FM)	GREENVILLE	SC	90.1
5	WJES-FM	SALUDA	SC	92.1
6	WESC-FM	GREENVILLE	SC	92.5
7	WZLA-FM	ABBEVILLE	SC	92.9
8	WTPT(FM)	FOREST CITY	NC	93.3
9	WFBC-FM	GREENVILLE	SC	93.7
10	WBDQ(FM)	CROSS HILL	SC	94.1
11	WMUU-FM	GREENVILLE	SC	94.5
12	WRXR-FM	AIKEN	SC	96.3
13	WCOS-FM	COLUMBIA	SC	97.5
14	WPEK(FM)	SENECA	SC	98.1
15	WSPA-FM	SPARTANBURG	SC	98.9
16	WKXC-FM	AIKEN	SC	99.5
17	WSSL-FM	GRAY COURT	SC	100.5
18	WROQ(FM)	ANDERSON	SC	101.1
19	WRIX-FM	HONEA PATH	SC	103.1
20	WZSN(FM)	GREENWOOD	SC	103.5
21	WBBQ-FM	AUGUSTA	GA	104.3
22	WZNY(FM)	AUGUSTA	GA	105.7
23	WGVC(FM)	NEWBERRY	SC	106.3
24	WJMZ-FM	ANDERSON	SC	107.3
25	WPRW-FM	MARTINEZ	GA	107.7
26	WLMA	GREENWOOD	SC	1350. kHz
27	WCRS	GREENWOOD	SC	1450
28	WABV	ABBEVILLE	SC	1590

EXHIBIT E-6
OTHER AURAL SERVICES WITHIN WCRS-FM
PROPOSED GAIN AREA AT MAULDIN

Sutton Radiocasting Corporation
December 1999

NUMBER OF STATIONS SERVING THIS AREA	LAND AREA			POPULATION	
	SQUARE KILOMETERS	SQUARE MILES	% OF GAIN AREA	1990 CENSUS POPULATION	% OF GAIN AREA
0	0.00	0.00	0.00	0	0.00
1	0.00	0.00	0.00	0	0.00
2	0.00	0.00	0.00	0	0.00
3	0.00	0.00	0.00	0	0.00
4	0.00	0.00	0.00	0	0.00
5	0.00	0.00	0.00	0	0.00
6	0.00	0.00	0.00	0	0.00
7	0.00	0.00	0.00	0	0.00
8	0.00	0.00	0.00	0	0.00
9	0.00	0.00	0.00	0	0.00
10	8.41	3.25	0.34	85	0.03
11	297.78	114.97	11.96	7,699	2.34
12	194.22	74.99	7.80	4,316	1.31
13	374.80	144.71	15.06	12,211	3.72
14	211.82	81.78	8.51	14,299	4.35
15	257.78	99.53	10.36	12,087	3.68
16	135.90	52.47	5.46	7,999	2.43
17	331.64	128.05	13.32	31,125	9.47
18	344.20	132.90	13.83	68,668	20.90
19	285.57	110.26	11.47	151,003	45.95
20	39.20	15.14	1.57	17,488	5.32
21	7.70	2.97	0.31	1,633	0.50
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
TOTALS:	2,489.03	961.02	100.0 %	328,613	100.0 %

EXHIBIT E-7
STATIONS PROVIDING OTHER AURAL BROADCAST SERVICES
WITHIN WCRS-FM PROPOSED GAIN AREA AT MAULDIN

Sutton Radiocasting Corporation
December 1999

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
1	WSBF-FM	CLEMSON	SC	88.1 MHz
2	WEPC(FM)	BELTON	SC	88.5
3	WLFJ(FM)	GREENVILLE	SC	89.3
4	WEPR(FM)	GREENVILLE	SC	90.1
5	WRAF(FM)	TOCCOA FALLS	GA	90.9
6	WYFG(FM)	GAFFNEY	SC	91.1
7	WTBI-FM	GREENVILLE	SC	91.7
8	WESC-FM	GREENVILLE	SC	92.5
9	WZLA-FM	ABBEVILLE	SC	92.9
10	WTPT(FM)	FOREST CITY	NC	93.3
11	WFBC-FM	GREENVILLE	SC	93.7
12	WMUU-FM	GREENVILLE	SC	94.5
13	WPEK(FM)	SENECA	SC	98.1
14	WSPA-FM	SPARTANBURG	SC	98.9
15	WKSF(FM)	ASHEVILLE	NC	99.9
16	WSSL-FM	GRAY COURT	SC	100.5
17	WROQ(FM)	ANDERSON	SC	101.1
18	WMYI(FM)	HENDERSONVILLE	NC	102.5
19	WRIX-FM	HONEA PATH	SC	103.1
20	WOLT(FM)	GREER	SC	103.3
21	WZSN(FM)	GREENWOOD	SC	103.5
22	WOLI(FM)	EASLEY	SC	103.9
23	WCCP-FM	CLEMSON	SC	104.9
24	WAGI-FM	GAFFNEY	SC	105.3
25	WMIT(FM)	BLACK MOUNTAIN	NC	106.9
26	WJMZ-FM	ANDERSON	SC	107.3
27	WPJM	GREER	SC	800. kHz
28	WSPA	SPARTANBURG	SC	950
29	WHYZ	SANS SOUCI	SC	1070
30	WAIM	ANDERSON	SC	1230
31	WMUU	GREENVILLE	SC	1260
32	WYRD	GREENVILLE	SC	1330
33	WGVL	GREENVILLE	SC	1440
34	WPCI	GREENVILLE	SC	1490
35	WFIS	FOUNTAIN INN	SC	1600