

ORIGINAL

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of)	MM Docket No. 99-331
)	
Amendment of Section 73.202(b))	RM-
Table of Allotments)	
FM Broadcast Stations)	
(Madisonville, and)	
College Station, Texas))	
To: Chief, Allocations Branch		
Policy and Rules Division		
Mass Media Bureau		

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS AND COUNTERPROPOSAL

Garwood Broadcasting Company of Texas ("Garwood") pursuant to Sections 1.415 and 1.420 of the Commission's Rules hereby files the instant Comments and Counterproposal in response to the Notice of Proposed Rulemaking ("NPR") issued in the above-captioned proceeding as released November 19, 1999 (DA 99-2564).

In the NPR Sunburst Media, L.P. ("Sunburst") proposed the reallocation of Channel 241C2 from Madisonville, Texas, to College Station, Texas, as the third commercial station for College Station, and indicated it would file an application for that channel if so allotted. Obviously, although College Station would gain a new service, Madisonville would at the same time lose a service.

Conversely, as more fully documented in the attached Engineering Statement in support of this Counterproposal, Garwood in the instant Counterproposal submits a plan that will in fact vastly increase the public interest benefits beyond those suggested in the original NPR. As this proposal is mutually

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exclusive with the original proposal, it is properly filed as a counterproposal to be considered in this Docket. Garwood requests that the Table of Allocations be amended as follows:

City	Present	Proposed
Garwood, Texas	-	241A
Sheridan, Texas	-	252C3
Edna, Texas	241C3	- *
Columbus, Texas	252A	273C1
Bay City, Texas	273C2, 269C1	259C2, 269C1
Palacios, Texas	259C2	264A

* Edna would continue to receive local service from KTMR (AM), a 10KW station presently serving and licensed to Edna.

I. Allocation of New Channel 241A to Garwood, Texas.

The city of Garwood is a census designated place with its own zip code, which had a 1990 population of over 600 persons (1998 Rand McNally Road Atlas), is located in Colorado County, approximately 80 miles from Houston and 130 miles from San Antonio, and has no existing local radio service. It is located on the Colorado river and is the center of Rice farming, which is the largest revenue producer in the area. Typical of that area of Texas, although modest in size, it is an important center of operations for the large ranches and farms that surround it. It is located in Colorado County which itself has a population of 20,100 persons.

Garwood has its own identity, has an elementary and secondary school in town, has city water and a volunteer fire department. As a center for the wide area of farms and ranches surrounding it, Garwood hosts an annual Festival each year that brings thousands of persons into the town. Allotment of a new FM channel 241A as a first local radio service for Garwood would clearly serve the public interest of the Town of Garwood as well as the surrounding area which it would serve. Garwood Broadcasting Company of Texas hereby states its full intention and commitment without reservation to apply for use of the channel if allocated and, upon FCC approval of its application, to diligently construct and operate the station.

II. Relocation of channel 241C3 from Edna, Texas, to Provide a New Service on Channel 252C3 in Sheridan, Texas.

Radio Station KGUL(FM), licensed to Hill Country Radio, is presently licensed to operate on channel 241C3 in Edna, Texas. At the present time the station is, with FCC Authority, silent with an application for assignment of license to Fort Bend Broadcasting Company filed on October 7, 1999, and currently pending. In its request for silent authority as filed with the Commission on October 15, 1999, the licensee referred to the "dire financial straits" of the station in seeking to operate in Edna. Edna is a rural community with a population of 5,343 and is presently served by two stations licensed to Edna: KGUL(FM) and KTMR, a 10KW AM station also licensed to Edna.

It is proposed here to delete channel 241C3 from Edna and relocate station KGUL(FM) to a new allocation of channel 252C3 at

the new community of Sheridan, Texas. The city of Sheridan is a census designated place with its own zip code, located approximately 15 miles North of Edna, 90 miles from Houston and 120 miles from San Antonio. It had a 1990 U.S. Census population of over 450 persons and is known throughout the state as the state's "Deer Hunting Capitol". Sheridan has its own separate identity, elementary and secondary school, city water and volunteer fire department, churches, etc. Major employers in the town include the Shell Oil Company processing plant, along with Splash-Way, a major water park which swells the population during the summer months to over 1,000 persons during weekdays and up to 2,000 persons on weekends. Sheridan is surrounded by large ranches and farms and serves as a central community for the area.

As noted above, KGUL in Edna has experienced financial difficulties in competing with the other station also licensed to Edna. The relocation of KGUL from Edna will provide a first local radio service to the town of Sheridan, and increase the prospects for financial viability of that station. At the same time, the town of Edna would continue to receive its own strong local radio service from KTMR(AM), whose own financial stability should also be substantially enhanced by the change.

As noted, at present, Sheridan has no local service at all and reallocation of KGUL(FM) to channel 252C3 in Sheridan would provide Sheridan with its first local transmission radio service. Adoption of this proposal would therefore serve the first priority of the Commission's allotment priorities, that of

providing a new first local transmission radio service, and would be in the public interest.

Since this proposed change in allotment could not be completed without use of the licensee's present assignment it is submitted that it is consistent with Section 1.420(i) of the Commission's rules and should be protected as such. It is therefore requested that upon approval of the requested reallocation, the existing license of KGUL(FM) be modified to specify operation on the new channel and community. Attached hereto is a statement of support and commitment from the current licensee of KGUL(FM) as well as the proposed assignee of KGUL(FM), both of whom fully support this proposal and are pledged to file an application for use of the new channel and community upon FCC approval of the requested change in allotment.

III. Modification of allocated channel and transmitter location for KULM(FM), Columbus, Texas.

KULM(FM) is currently licensed to Equicom. Inc. which operates the station on channel 252A in Columbus, Texas. There is also pending an application for assignment of license of KULM(FM) which was filed with the Commission on December 30, 1999, and which is currently pending. From its current location and channel, KULM has limited coverage of its general service area. It is proposed here to upgrade the operating channel from 252A to 273C1, thus, as shown in the attached Engineering Statement, substantially increasing the efficiency of service and providing a much larger area of service in both terms of area and population beyond what is currently provided. This can all be

achieved by relocating the transmitter location of the station due south by 40.9 Km to a new location at N 29-20-15; W 96-32-35.

Operating from this location on channel 273C1, KULM(FM) would continue to meet all coverage rules applicable to its existing city of license and would, at the same time, provide service not only to the 3,367 persons in the city of Columbus, but also to substantially more people in a substantially larger coverage area. As the only FM station licensed to Columbus, it is clearly in the public interest to also provide service to the widest possible surrounding area and this modification would clearly serve that purpose. It is noted that this proposed change is mutually exclusive with the current operating channel of KULM(FM) and it is therefore requested that upon approval of the change in allotment, the license of KULM(FM) be modified to specify operation on the new channel and transmitter location. Attached hereto is a statement of support and commitment from the current licensee of KGUL(FM) as well as the proposed Assignee of KGUL(FM), both of whom fully support this proposal and are pledged to file an application for use of this modified channel upon FCC approval of the requested change in allotment.

IV. Modification of operating Channel of KMKS(FM), Bay City, Texas from 273C2 to Equivalent Channel 259C2

Station KMKS(FM), presently licensed to Sandlin Broadcasting Co., Inc., operates in Bay City, Texas on channel 273C2. As part of the changes required to implement this Counterproposal it will be necessary to change the operating channel of KMKS(FM) in Bay City, Texas, from 273C2 to 259C2. As noted, there is no change

proposed in the channel class, with a C2 channel being substituted for the existing C2 channel, nor is there any need or proposal to change the existing transmitter site of KMKS(FM). It is therefore submitted that the proposed change in channel for KMKS(FM) will be of minimal inconvenience. In any case, Garwood commits here to reimburse the licensee of KMKS(FM) for any expenses incurred as part of the requested change in channel.

V. Proposed Change in Channel for Palacios, Texas.

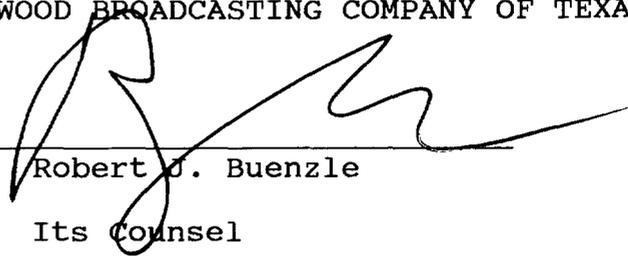
Station KKOS(FM) in Palacios, Texas, is licensed to Fort Bend Broadcasting Company and currently operates there on Channel 259C2. In order to implement the instant Counterproposal, it will be necessary to change the allocation in Palacios from 259C2 to 264A at a new transmitter site location of N 28-36-30, W 96-09-58. KKOS will continue to meet all coverage rules from that location and the City of Palacios will continue to receive its own local service from KKOS. Attached hereto is a Statement by the licensee of KKOS(FM) in full support and agreement with the change, without reservation, and verifying and affirming the licensee's intention to diligently and expeditiously file its application to construct and operate on the new channel if allotted by the Commission.

VI. Conclusion

In sum, it is submitted that the instant Counterproposal will result in the most efficient use of the available allocations in the Central Texas area to provide the greatest amount of service, both in terms of area and population. Accordingly, consistent with the priorities as set forth by the Commission in Revision of FM Assignment Policies and Procedures, 51 P&F RR 807, 810 (1982), and as further set forth in Columbus, Nebraska, et.al., 51 Fed. Reg. 4926, Feb. 10, 1986. For these reasons, it is respectfully submitted that the instant counterproposal is in the public interest and should be adopted.

Respectfully submitted,

GARWOOD BROADCASTING COMPANY OF TEXAS

by 
Robert J. Buenzle

Its Counsel

Law Offices
Robert J. Buenzle
12110 Sunset Hills Road
Suite 450
Reston, Virginia 22090
(703) 715-3006

January 10, 2000

Garwood Broadcasting Company of Texas
Comments and Counterproposal in
MM Docket No. 99-331
Madisonville and College Station, Texas
January 10, 2000

Statements of Commitment and Agreement

January 7, 2000

The Federal Communications Commission
Washington, D.C.

Re Consent to Channel Change and Relocation
of Radio Station KGUL(FM), Edna, Texas,
in Docket MM 99-331.

This is to confirm that Hill Country Radio, licensee of KGUL(FM), presently licensed to operate on channel 241C3 in Edna, Texas, hereby agrees without reservation to the proposed change in channel and relocation of community of KGUL(FM) from 241C3 in Edna to channel 252C3 in the new community of Sheridan, Texas, and requests that Hill Country's license for KGUL(FM) be modified accordingly. Hill Country Radio further confirms its present intention that upon FCC approval and allotment, it will file an application for use of the modified channel and, upon approval, to move diligently to construct and operate the station consistent with such approval and proceed to take any and all other actions necessary to complete the channel modification and change in community of license. I verify that this statement is true and correct to the best of my knowledge and is submitted in good faith.

Hill Country Radio

By: *[Signature]*
Its: *President*

This is to confirm that Fort Bend Broadcasting Company, proposed Assignee of Radio Station KGUL(FM) under an Assignment of License application filed with the FCC on October 7, 1999, subscribes in full and without reservation to the agreement and commitment as set forth above and upon FCC approval of the pending application for assignment of license of KGUL(FM) will proceed to honor those commitments in full, to file an application for construction and use of the modified facilities and to take any and all other actions as may be necessary to implement the change if adopted by the FCC. I verify that this statement is true and correct to the best of my knowledge and belief and is submitted in good faith.

Fort Bend Broadcasting Company

By: *[Signature]*
Its: *President*

FROM EQUUS

(MON) 01. 10' 00 14:11/ST. 14:10/NO. 3560249020 P 2

Jan-07-00 12:47P

P.02

January 7, 2000

The Federal Communications Commission
Washington D.C.

Re: Consent to channel change in Docket FM 99-331

This is to confirm that Equicom, Inc., licensee of Radio Station KULM(FM), licensed to operate on channel 252A in Columbus, Texas, hereby agrees to the proposed modification of that facility from its existing channel to a new operation on channel 273C1 at a new transmitter site located at 29-20-15; 96-32-35, and requests that Equicom's license for KULM(FM) be modified accordingly. Equicom further confirms its present intention that upon FCC approval and allotment, it will file an application for use of the modified channel and upon authorization will diligently construct and operate the station, and proceed to take any and all other actions necessary to implement such changes. I verify that this statement is true and correct to the best of my knowledge and is submitted in good faith.

Equicom, Inc.

By RBAale

Its: Chairman

This is to confirm that Roy E. Henderson, proposed assignee of Radio Station KULM(FM) under an Assignment of License application filed with the FCC on December 30, 1999, subscribes in full and without reservation to the agreement and commitment as set forth above and upon FCC approval of the pending application for assignment of license of KULM(FM) will proceed to honor those commitments in full, to file an application for construction and use of the modified facilities and to take any and all other actions necessary to implement the change if adopted by the FCC. I verify that this statement is true and correct to the best of my knowledge and belief and is submitted in good faith.

January 7, 2000

The Federal Communications Commission
Washington D.C.

Re: Consent to channel Change in Docket MM 99-331

This is to confirm that Equicom, Inc., licensee of Radio Station KULM(FM), licensed to operate on channel 252A in Columbus, Texas, hereby agrees to the proposed modification of that facility from its existing channel to a new operation on channel 273C1 at a new transmitter site located at 29-20-15; 96-32-35, and requests that Equicom's license for KULM(FM) be modified accordingly. Equicom further confirms its present intention that upon FCC approval and allotment, it will file an application for use of the modified channel and upon authorization will diligently construct and operate the station, and proceed to take any and all other actions necessary to implement such changes. I verify that this statement is true and correct to the best of my knowledge and is submitted in good faith.

Equicom, Inc.

By _____

Its:

This is to confirm that Roy E. Henderson, proposed assignee of Radio Station KULM(FM) under an Assignment of License application filed with the FCC on December 30, 1999, subscribes in full and without reservation to the agreement and commitment as set forth above and upon FCC approval of the pending application for assignment of license of KULM(FM) will proceed to honor those commitments in full, to file an application for construction and use of the modified facilities and to take any and all other actions necessary to implement the change if adopted by the FCC. I verify that this statement is true and correct to the best of my knowledge and belief and is submitted in good faith.



January 7, 2000

The Federal Communications Commission
Washington D.C.

Re: Consent to channel Change in Docket MM 99-331

This is to confirm that Fort Bend Broadcasting Company, licensee of Radio Station KKOS(FM), presently licensed to operate on channel 259C2 in Palacios, Texas, hereby agrees without reservation to the proposed modification of the allocation at Palacios from 259C2 to channel 264A and, upon adoption of such change in allotment by the FCC, verifies and affirms Fort Bend's intention to diligently and expeditiously file its application to construct and operate on that new channel and, if approved, to diligently construct and operate such facilities. I verify that this statement is true and correct to the best of my knowledge and is submitted in good faith.

Fort Bend Broadcasting Company

By *J. E. Anderson*
Its: *President*

Garwood Broadcasting Company of Texas

COMMENTS AND COUNTERPROPOSAL

MM Docket 99-331

January 2000

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F. W. Hannel, PE

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STATE OF ILLINOIS)
)
COUNTY OF PEORIA) SS:

F. W. Hannel, after being duly sworn upon oath, deposes and states:

He is a registered Professional Engineer, by examination, in the State of Illinois;

He is a graduate Electrical Engineer, holding Bachelor of Science and Master of Science degrees, both in Electrical Engineering;

His qualifications are a matter of public record and have been accepted in prior filings and appearances requiring scrutiny of his professional qualifications;

The attached Engineering Report was prepared by him personally or under his supervision and direction and;

The facts stated herein are true, correct, and complete to the best of his knowledge and belief.



January 8, 2000

F. W. Hannel, P.E.

F. W. Hannel, PE
911 Edward Street
Henry, Illinois 61537
(309) 364-3903
Fax (815) 327-9559
fred@fwhannel.com
<http://www.fwhannel.com>

Garwood Broadcasting Company of Texas

COMMENTS AND COUNTERPROPOSAL

MM Docket 99-331

January 2000

ENGINEERING STATEMENT

This firm has been retained by Garwood Broadcasting Company of Texas, ("GBC"), to prepare this engineering statement in support of its Comments and Counterproposal in the above captioned proceeding.

Summary

The Commission, by Public Notice dated November 19, 1999, has proposed the allotment of FM Channel 241C2 to the community of College Station, Texas, and the deletion of that channel from Madisonville, Texas.

As a counterproposal in this proceeding, GBC is proposing that the Commission assign first local services to 2 communities, Garwood and Sheridan, Texas, assign an upgraded channel to Columbus, Texas, and to make other related changes in the FM Table of Allotments which provide a more efficient distribution of the FM services to several communities in Central Texas. The public interest benefits of this proposal are vastly superior to the mere reassignment of an existing service from one well served community to another well served community as is proposed in the Notice of Proposed Rulemaking.

To summarize, this Counterproposal includes:

1. **Garwood, Texas.** Assign FM Channel 241A to Garwood, Texas as a first local service to that community.
2. **Edna, Texas.** Delete the presently assigned FM Channel 241C3 and amend the license of Radio Station KGUL(FM) to specify operation on FM Channel 252C3 at Sheridan, Texas, as that community's first local service and amend the license of KGUL(FM) accordingly.

3. **Columbus, Texas.** Allot FM Channel 273C1 as that community's first wide coverage area local service and amend the license of Radio Station KULM(FM) to specify operation on FM Channel 273C1.
4. **Bay City, Texas.** Delete FM Channel 273C2 and involuntarily amend the license of Radio Station KMKS(FM) to specify operation on FM Channel 259C2 at the present transmitter site of Radio Station KMKS(FM).
5. **Palacios, Texas.** Delete the presently assigned FM Channel 259C2 at Palacios, Texas, and amend the license of Radio Station KKOS(FM) to specify operation on FM Channel 264A.

These changes in the FM Table of Allotments as proposed in this Counterproposal will provide improved FM service, as well as new FM service, to several communities in Texas as well as provide upgraded local service at Columbus, Texas. No community involved is deprived of a local transmission service. The net public interest benefits as described below will result in a substantial improvement in the distribution of the FM service to various communities in central Texas and will result in a preferential arrangement of the FM Table of Allotments in a manner that is vastly superior to the proposal to merely relocate an existing service from one well served community to another well served community as is proposed in the Notice of Proposed Rulemaking.

DISCUSSION

I. GARWOOD, TEXAS. The community of Garwood, Texas is located at geographic co-ordinates N29-26-58, W96-23-48, and the allotment site for the assignment of FM Channel 241A is N29-20-01, W96-26-44. This allotment site is 13.5 kilometers south of Garwood, Texas, and a Class A facility located at these allotment co-ordinates will fully comply with the Commission's city grade illumination requirements. Attached as Exhibit E-1 is an FM Channel Study conducted from the allotment reference co-ordinates which show the channel allotment can be made provided FM Channel 241C3 at Edna, Texas was relocated.

The community of Garwood, Texas has a population of 600 persons, and is located in Colorado County, which has a population of 20,100 persons. The Community is fully qualified under Commission Rules to receive a first local FM assignment. The attached Exhibit E-1 is an FM Channel Study conducted from the allotment co-ordinates and this study demonstrates that the allotment is in full compliance with the Commission's mileage separation requirements with respect to all facilities except FM Channel 241C3 at Edna, Texas, occupied by Radio Station KGUL(FM).

II. EDNA AND SHERIDAN, TEXAS. It is proposed that FM Channel 241C3 at Edna, Texas, be deleted and the license of Radio Station KGUL(FM) be modified to specify operation on FM Channel 252C3 at Sheridan, Texas as a first local service to that community.

The community of Sheridan, Texas is located at geographic co-ordinates N29-29-36, W96-40-15 and has a city population of 450 persons. It is located in Colorado County which has a population of 20,100 persons, and the requested assignment of FM Channel 252C2 to Sheridan would provide that community with its first local aural service. A transmitter located at the allotment co-ordinates N29-23-50, W96-37-51, located 11.3 kilometers southeast of Sheridan and operating with 6 kw at antenna height 100 meters above average terrain will fully comply with the

Commission's minimum mileage separation and city grade illumination requirements. Exhibit E-2 is an FM Channel Study conducted from the allotment co-ordinates at Sheridan, Texas, which demonstrates that the allotment fully complies with the Commission's minimum mileage separation requirements with respect to all facilities except FM Channel 252A presently assigned to Columbus, Texas.

III. COLUMBUS, TEXAS. It is proposed that FM Channel 252A at Columbus, Texas be deleted and the license of Radio Station KULM(FM) be amended to specify operation on FM Channel 273C1 at that community as its first wide coverage area facility. The community of Columbus, Texas, is located at US Atlas co-ordinates N29-42-23, W96-32-32 and a transmitter operating on FM Channel 273C1 at the allotment reference site, (N29-20-15, W96-32-35), will fully illuminate the city with the required 70 dbu signal intensity and fully satisfy the mileage separation requirements of the Rules. The distance from the allotment reference site to the city is 40.9 km, and a transmitter operating on FM Channel 273C1 at the allotment site fully illuminates Columbus, Texas, with the required 70 dbu contour. Attached as Exhibit E-3 is an FM Channel Study conducted from the allotment site for FM Channel 273C1 at Columbus, Texas which shows that the allotment at Columbus can be made as requested if FM Channel 273C2, presently occupied by Radio Station KMKS(FM), Bay City, Texas, were relocated to FM Channel 259C2 as is proposed in this Counterproposal

IV. BAY CITY, TEXAS. It is proposed that FM Channel 273C2¹ at Bay City, Texas, presently occupied by Radio Station KMKS(FM), be deleted and the license of Radio Station KMKS(FM) be involuntarily modified to specify operation on FM Channel 259C2 at the present KMKS(FM) transmitter site. Attached as Exhibit E-4 is an FM Channel Study that shows that the allotment of FM Channel 259C2 can be made at Bay

¹ The Commission's records show that FM Channel 273C1 is allotted to Bay City, Texas. KMKS(FM) at Bay City held a Construction Permit several years ago for the Class C1 channel, but that Permit has long since expired. The channel has laid fallow for a number of years. This proposal seeks to utilize the channel that has been warehoused at Bay City for some considerable length of time.

City, Texas, at the present transmitter site of Radio Station KMKS(FM) if Palacios, Texas, were relocated to FM Channel 264A as requested in this Counterproposal.

V. PALACIOS, TEXAS. It is proposed that FM Channel 259C2 at Palacios, Texas, presently occupied by Radio Station KKOS(FM), be deleted and the license of Radio Station KKKOS(FM) be modified to specify operation on FM Channel 264A. FM Channel 264A can be assigned to Palacios, Texas, at transmitter reference site N28-36-30, W96-09-58, 12 kilometers from the city of Palacios, Texas, (US Atlas co-ordinates N28-42-28, W96-13-02). Attached as Exhibit E-5 is an FM Channel Study that shows that the allotment of FM Channel 264A can be made at Palacios, Texas at the requested allotment site reference co-ordinates.

CONCLUSION

In view of the foregoing, it is respectfully requested that the Commission adopt this counterproposal and amend the FM Table of Allotments as follows:

City	Present	Proposed
Garwood, Texas	-----	241A
Sheridan, Texas	-----	252C3
Edna, Texas	241C3	----- ²
Columbus, Texas	252A	273C1
Bay City, Texas	273C2, 269C1	259C2, 269C1
Palacios, Texas	259C2	264A

The adoption of this proposal will result in a number of substantial public interest enhancements as compared to the original proposal to simply move FM Channel 241C2 from one community to another, both of which are presently well served by other aural services. Two communities receive a first local aural service, Columbus, Texas receives its first wide coverage area facility, and no community is deprived of a local service, all of which are significant improvements in the distribution of FM services to the various communities.

This counterproposal clearly offers substantial improvements in the distribution of FM services and the numerous other public interest benefits and is superior to the proposal to reallocate FM Channel 241C2 from Madisonville to College Station, Texas, both

² Edna, Texas is served by AM station KTMR(AM), operating on 1130 khz with power of 10 kw as a remaining local aural service.

of which are already well served by existing local aural services. Garwood Broadcasting Company of Texas respectfully requests that its proposal be adopted and that the proposed re-allotment of FM Channel 241C2 from Madisonville to College Station, Texas, be denied.

Garwood Broadcasting Company of Texas

COMMENTS AND COUNTERPROPOSAL

MM Docket 99-331

January 2000

FM Channel Study

FM Channel 241A

Garwood, Texas

N29-20-01 W96-26-44

Exhibit E-1

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
ALC	Houston	TX	239	C	U	94.7	95.0	73.5°	-0.3
KIKKFM	Houston	TX	239	C	L	104.1	95.0	63.8°	9.1
KIKKFM	Houston	TX	239	C	L	94.7	95.0	73.5°	-0.3
KIKKFM	Houston	TX	239	C	L	94.7	95.0	73.5°	-0.3
ALC	Goliad	TX	240	C3	U	124.6	89.0	236.5°	35.6
KHMC	Goliad	TX	240	C3	C	111.2	89.0	229.5°	22.2
KHMC	Goliad	TX	240	A	L	111.2	72.0	229.5°	39.2
ALC	Edna	TX	241	C3	U	25.8	142.0	182.1°	-116.2
ALC	San Antonio	TX	241	C1	U	214.5	200.0	278.9°	14.5
ALC	Madisonville	TX	241	C2	U	180.0	166.0	11.2°	14.0
FA USE	College Station	TX	241	C2	A	157.8	166.0	1.3°	-8.2
KAGG	Madisonville	TX	241	C2	L	165.7	166.0	11.0°	-0.3
KGUL	Edna	TX	241	C3	L	25.8	142.0	182.1°	-116.2
KXXM	San Antonio	TX	241	C1	L	214.5	200.0	278.9°	14.5
ALC	Yorktown	TX	242	A	V	102.1	72.0	251.5°	30.1
ALC	Houston	TX	243	C	U	94.7	95.0	73.5°	-0.3
KHMX	Houston	TX	243	C	L	94.7	95.0	73.5°	-0.3

All Distances in Kilometers

Garwood Broadcasting Company of Texas

COMMENTS AND COUNTERPROPOSAL

MM Docket 99-331

January 2000

FM Channel Study
 FM Channel 252C3
 Sheridan, Texas
 N29-23-50 W96-37-51

Exhibit E-2

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
ALC	Cuero	TX	249	C3	U	66.0	43.0	255.0°	23.0
KVCQ	Cuero	TX	249	C3	L	69.1	43.0	238.8°	26.1
ALC	Houston	TX	250	C	U	110.5	96.0	79.7°	14.5
KBXX	Houston	TX	250	C	L	110.5	96.0	79.7°	14.5
KBXX	Houston	TX	250	C	L	110.5	96.0	79.7°	14.5
ALC	Austin	TX	251	C1	U	143.6	144.0	310.8°	-0.4
KVETFM	Austin	TX	251	C1	L	147.5	144.0	308.4°	3.5
KVETFM	Austin	TX	251	C1	C	152.4	144.0	312.1°	8.4
ALC	Odem	TX	252	C2	U	196.3	177.0	205.8°	19.3
ALC	Bryan	TX	252	A	U	141.6	142.0	11.1°	-0.4
ALC	Columbus	TX	252	A	U	34.1	142.0	9.4°	-107.9
ALC	Palacios	TX	252	A	A	87.6	142.0	146.8°	-54.4 ³
KLHB	Odem	TX	252	C3	L	187.4	153.0	207.1°	34.4
KLHB	Odem	TX	252	C2	C	195.3	177.0	204.2°	18.3
KORAFM	Bryan	TX	252	A	L	141.6	142.0	11.1°	-0.4
KULMFM	Columbus	TX	252	A	L	34.1	142.0	9.4°	-107.9
ALC	Victoria	TX	254	C1	U	77.2	76.0	213.0°	1.2
KTXNFM	Victoria	TX	254	C1	L	77.2	76.0	213.0°	1.2

All Distances in Kilometers

³ The proposed assignment of FM Channel 252A at Palacios has been withdrawn by the petitioner.

Garwood Broadcasting Company of Texas

COMMENTS AND COUNTERPROPOSAL

MM Docket 99-331

January 2000

FM Channel Study
 FM Channel 273C1
 Columbus, Texas
 N29-20-15 W96-32-35

Exhibit E-3

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
ALC	Houston	TX	271	C	U	105.1	105.0	75.6°	0.1
KMJQ	Houston	TX	271	C	L	115.1	105.0	68.2°	10.1
KMJQ	Houston	TX	271	C	L	123.1	105.0	67.7°	18.1
KMJQ	Houston	TX	271	C	L	105.1	105.0	75.6°	0.1
ALC	Rockport	TX	272	C2	U	179.5	158.0	201.0°	21.5
KBTE	Rockport	TX	272	C2	L	175.5	158.0	200.5°	17.5
KBTE	Rockport	TX	272	C2	C	175.9	158.0	202.1°	17.9
KPEZ	Austin	TX	272	C2	L	158.3	158.0	308.3°	0.3
ALC	Bay City	TX	273	C1	V	28.4	245.0	157.9°	-216.6
ALC	Beaumont	TX	273	C2	U	246.2	224.0	73.1°	22.2
ALC	Hillsboro	TX	273	C1	U	282.0	245.0	347.9°	37.0
KBRQ	Hillsboro	TX	273	C1	L	282.0	245.0	347.9°	37.0
KMKS	Bay City	TX	273	C2	L	70.9	224.0	147.8°	-153.1
KTCX	Beaumont	TX	273	C2	L	233.9	224.0	72.0°	9.9
ALC	Caldwell	TX	274	A	A	139.3	133.0	351.0°	6.3
ALC	San Antonio	TX	274	C1	U	188.7	177.0	272.7°	11.7
KTFM	San Antonio	TX	274	C1	L	188.7	177.0	272.7°	11.7
ALC	Houston	TX	275	C	U	125.7	105.0	68.3°	20.7
KLTN	Houston	TX	275	C	L	125.7	105.0	68.3°	20.7

All Distances in Kilometers

Garwood Broadcasting Company of Texas

COMMENTS AND COUNTERPROPOSAL

MM Docket 99-331

January 2000

FM Channel Study
 FM Channel 259C2
 Bay City, Texas
 N28-47-47 W96-09-17

Exhibit E-4

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
ALC	Houston	TX	256	C	U	106.8	105.0	36.0°	1.8
KODA	Houston	TX	256	C	L	131.3	105.0	35.6°	26.3
KODA	Houston	TX	256	C	L	106.8	105.0	36.0°	1.8
ALC	San Antonio	TX	258	C	U	212.2	188.0	284.5°	24.2
KISSFM	San Antonio	TX	258	C	L	212.2	188.0	284.5°	24.2
ALC	Palacios	TX	259	C2	U	11.2	190.0	130.0°	-178.8
KKOS	Palacios	TX	259	C2	L	9.5	190.0	139.0°	-180.5
ALC	Robstown	TX	260	C1	U	179.1	158.0	231.7°	21.1
KSAB	Robstown	TX	260	C1	L	184.0	158.0	230.5°	26.0
KTXM	Hallettsville	TX	260	A	L	105.9	106.0	314.2°	-0.1
ALC	Houston	TX	262	C	U	106.8	105.0	36.0°	1.8
KILTFM	Houston	TX	262	C	L	106.8	105.0	36.0°	1.8

All Distances in Kilometers

Garwood Broadcasting Company of Texas

COMMENTS AND COUNTERPROPOSAL

MM Docket 99-331

January 2000

FM Channel Study
 FM Channel 264A
 Palacios, Texas
 N28-36-30 W96-09-58

Exhibit E-5

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
ALC	Houston	TX	262	C	U	124.8	95.0	30.8°	29.8
KILTFM	Houston	TX	262	C	L	124.8	95.0	30.8°	29.8
ALC	Austin	TX	264	C	U	247.3	226.0	320.1°	21.3
KASE	Austin	TX	264	C	L	247.5	226.0	320.1°	21.5
KASE	Austin	TX	264	C	L	247.5	226.0	320.1°	21.5
KASE	Austin	TX	264	C	L	247.3	226.0	320.1°	21.3
KRTXFM	Winnie	TX	264	C	L	225.7	226.0	44.9°	-0.3
ALC	Victoria	TX	265	C3	V	90.3	89.0	282.0°	1.3
ALC	Victoria	TX	265	A	U	88.7	72.0	283.0°	16.7
KEPG	Victoria	TX	265	C3	A	88.7	89.0	283.0°	-0.3
KEPG	Victoria	TX	265	A	L	88.7	72.0	283.0°	16.7
NEW	Victoria	TX	265	A	A	90.5	72.0	284.5°	18.5
ALC	Houston	TX	266	C	U	124.8	95.0	30.8°	29.8
KLLOL	Houston	TX	266	C	L	124.8	95.0	30.8°	29.8
KLLOL	Houston	TX	266	C	L	124.8	95.0	30.8°	29.8

All Distances in Kilometers

CERTIFICATE OF SERVICE

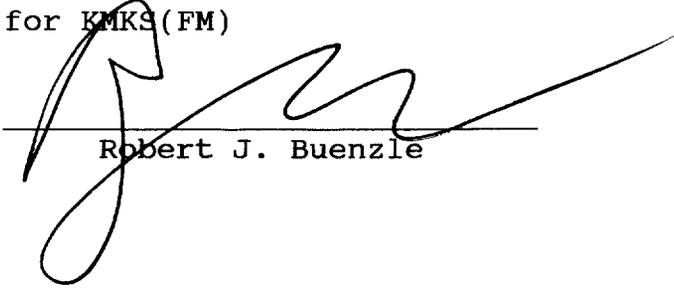
I, Robert J. Buenzle, do hereby certify that copies of the foregoing Comments and Counterproposal have been served by United States mail, postage prepaid this 10th day of January, 2000, upon the following:

Robert Hayne, Esq.
Federal Communications Commission
Mass Media Bureau
Portals II, Room 3-A266
445 12th Street SW
Third Floor
Washington, D.C. 20024

Gregg P. Skall, Esq.
Lee G. Petro, ESQ.
Pepper & Corazzini, L.L.P.
1776 K Street N.W., Suite 200
Washington, D.C. 20006
Counsel for Sunburst Media, LP

Sandlin Broadcasting Co., Inc.
P.O. Box 789
Bay City, Texas 77404
Licensee of KMKS(FM)

Helen E. Disenhaus, Esq.
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
Counsel for KMKS(FM)



Robert J. Buenzle