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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
**Federal Communications Commission**  
Washington, DC

In the Matter of	)	
	)	
<i>Amendment of Section 202(b),</i>	)	MM Docket No. 99-259
<i>Table of Allotments,</i>	)	RM-9685
<i>FM Broadcast Stations</i>	)	
<i>(Soperton and</i>	)	
<i>East Dublin, Georgia)</i>	)	
	)	
To: <b>Chief, Allocations Branch</b>	)	

**SUPPLEMENTAL COMMENTS**

Transmitted herewith, on behalf of Metro Com Corp., licensee of Station WKKN(FM), Cordele, Georgia ("WKKN"), Broadcast Equities Corp, permittee of WEGF(FM), Montezuma, Georgia ("BEC"), Tri-County Broadcasting Company, licensee of Station WQSY(FM), Hawkinsville, Georgia ("WQSY"), and Multi-Service Corp., licensee of Station WPMX, Statesboro, Georgia ("Multi-Service"), are copies of a "Counterproposal" filed in MM Docket No. 00-18 by Multi-Service.

As a counterproposal to MM Docket No. 00-18, Multi-Service has proposed that the channel of operation of WPMX be modified from Channel 257C3 in lieu of Channel 257C3. As seen therein, that modification allows Channel 276C3 to be allotted to East Dublin in lieu of the Channel 251C3 proposed for East Dublin in this docket, MM Docket No. 99-199. An adoption of the modified of the East Dublin proposal not only will allow Lacom Communications, Inc. to have its desired Class C3 service allotted to East Dublin, it will also result in three additional beneficial results. Specifically, allotting Channel 276C3 in lieu of Channel 251C3 at East Dublin allows for the resolution of two existing Dockets proceedings pending before the Commission, and for the allotment of first service to one additional community.

No. of Copies rec'd \_\_\_\_\_  
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First, allotting Channel 276C3 in lieu of Channel 251C3 at East Dublin allows for the resolution of this docket, MM Docket No. 99-259, insofar as that modification clears the way for the allotment of Channel 253A to be allotted to Soperton, Georgia, as that community's second aural service, as proposed in RM-9685. Second, allotting Channel 276C3 in lieu of Channel 251C3 to East Dublin will also allow for resolution of MM Docket No. 99-199, insofar as allotting Channel 276C3 in lieu of Channel 251C3 will allow not only for a city of license change/Class C3 upgrade to occur for Lacom/WELT, it also will permit the substitution of Channel 236C3 for Channel 252A at Cordele, and the modification of Station WKKN's license to specify the higher class channel; the substitution of Channel 280C3 for Channel 236A at Montezuma, and the modification of the WEGF construction permit to specify the higher class channel; and the substitution of Channel 252C3 for Channel 280C3 at Hawkinsville and the modification of Station WQSY's license to specify the alternate Class C3, all as proposed in RM-9564. The net result there will be three upgraded channels and stations (WELT, WKKN, and WEGF).<sup>1</sup> Finally, as proposed in MM Docket No. 00-18, allotting Channel 276C3 in lieu of Channel 251C3 at East Dublin also allows for the allocation of Channel 251A to the community of Twin City. This allotment would constitute a first local service to Twin City.

Lacom/WELT, will not be unduly harmed by adoption of this modification to its proposal, insofar as Lacom/WELT still will receive a desired city of license change and Class C3 channel for use by Station WELT(FM), and the Commission routinely warns that "the filing of a counterproposal may lead the Commission to allot a different channel than was requested for any

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<sup>1</sup> Copies of the Comments and Counterproposal also is being filed in MM Docket No. 99-199, and served on all parties thereto.

of the communities involved.”<sup>2</sup>

Insofar as this proposal will result in a preferential arrangement of allotments and frequencies, it is respectfully requested that this proposal be considered in conjunction with this proceeding.

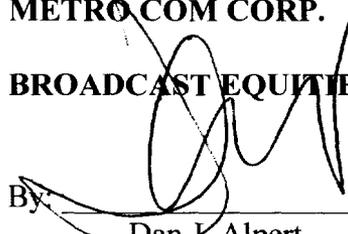
Accordingly, Metro Com Corp., Broadcast Equities, Inc., and Tri-County Broadcasting Company respectfully request that these Supplemental Comments be accepted and considered in this proceeding, and that the FM Table of Allotments be modified in the manner specified herein.

Respectfully submitted,

**TRI-COUNTY BROADCASTING  
COMPANY**

**METRO COM CORP.**

**BROADCAST EQUITIES CORP.**

By: 

\_\_\_\_\_  
Dan J. Alpert

Their Attorney

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(703) 243-8690

March 23, 2000

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<sup>2</sup> The Commission considers channels of the same class to be equivalent unless showings have been made that a station cannot be constructed for reasons such as environmental consequences or air hazards. *See Vero Beach, Florida*, 3 FCC Rcd 1049 (1988), *rev. denied*, 4 FCC 2184 (1989) and *Tawas City, Michigan*, 9 FCC Rcd 4794 (1994), *recon. denied*, 10 FCC Rcd 6108 (1995). Additionally, the fact that the allotment of Channel 276C3 to East Dublin requires a different set of reference coordinates be assigned to the East Dublin allotment is irrelevant. In *Indian Springs, NV, Mountain Pass, CA, et al.*, 14 Fcc Rcd 10568 (Allocations Branch 1999), the Commission observed that once a “petitioner has indicated her willingness to relocate [a station] should it be upgraded....the imposition of a different transmitter site falls within the Commission's existing policy to impose a different site restriction to accommodate an allotment elsewhere.” *Id.* at ¶ 14.

*Before the*  
**Federal Communications Commission**  
*Washington, DC*

In the Matter of	)	
	)	
Amendment of Section 202(b),	)	MM Docket No. 00-18
Table of Allotments,	)	RM-9790
FM Broadcast Stations	)	
<i>(Barnwell, South Carolina and Pembroke,</i>	)	
<i>Douglas and Willacoochee, Georgia;</i>	)	
<i>Statesboro, Pulaski, East Dublin,</i>	)	
<i>Swainsboro, Twin City, Georgia<sup>1</sup>)</i>	)	
	)	
To: Chief, Allocations Branch	)	

**COMMENTS AND COUNTERPROPOSAL**

Multi-Service Corp, licensee of Station WPMX(FM), Statesboro, Georgia, by its attorney, pursuant to the *Notice of Proposed Rule Making*, DA 00-172 (rel. Feb. 1, 2000) (“NPRM”), hereby submits the following comments and counterproposal in the above-referenced proceeding. In reference thereto, the following is stated:

According to the *NPRM*, Bullie Broadcasting Corporation, licensee of Station WBAW-FM, Channel 256C3, Barnwell, South Carolina, has requested the substitution of Channel 257C1 for Channel 256C3 at Barnwell, South Carolina, and the reallocation of the upgraded channel to Pembroke, Georgia, as the community’s first local aural service. To accommodate that allotment, Bullie also proposed to reallocate Channel 258C1 from Douglas, Georgia to Willacoochee, Georgia, as the community’s first local aural service. Finally, Bullie proposed that Channel 256C1 be allotted to Barnwell as a “back-fill” allotment, at new coordinates.

Multi-Service Corp. supports the reallocation of Channel 258C1 from Douglas to

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<sup>1</sup> The communities of Statesboro, Pulaski, East Dublin, Swainsboro, and Twin City, Georgia have been added to the caption.

Willacoochee. However, as a counterproposal to the allotment of Channel 257C1 to Pembroke, Multi Service proposes the following. Multi-Service proposes that the Commission allot Channel 257C3 in lieu of Channel 275C3 to Statesboro, and modify the license of Station WPMX to specify operation of WPMX on Channel 257C3. Multi-Service is the licensee of Station WPMX. Insofar as there will be only a change of channel for WPMX, but no change of site, power, or height of operation required to effectuate this channel exchange, the license of Station WPMX should be modified accordingly.

Allowing this lateral move of Station WPMX to occur in lieu of Bullie's proposal allows several additional, preferential modifications to the FM Table of Allotments to occur. First, by virtue of WPMX vacating Channel 275C3, Channel 275A can be allocated to the community of Pulaski, Georgia. Pulaski, Georgia is an incorporated community with no aural service currently allocated to the community.<sup>2</sup> This allotment, therefore, would constitute first local service to Pulaski.

Second, allowing this later move of WPMX in lieu of Bullie's proposal allows Channel 276C3 to be allotted to East Dublin in lieu of the Channel 251C3 proposed for East Dublin in MM Docket No. 99-199. This modification of the East Dublin proposal will allow the proponent in that proceeding to have its desired Class C3 service allotted to East Dublin, and will also result in additional three beneficial results. Specifically, allotting Channel 276C3 in lieu of Channel 251C3 at East Dublin allows for the resolution of two existing Dockets proceedings pending before the Commission, and for the allotment of first service to one additional community. First,

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<sup>2</sup> As seen in Attachment 1, which is a reproduction of information from the Georgia Municipal Association ("GMA"), Pulaski is a member of the GMA, and it has its own elected officials.

allotting Channel 276C3 in lieu of Channel 251C3 at East Dublin allows for the resolution of MM Docket No. 99-199, insofar as allotting Channel 276C3 in lieu of Channel 251C3 to East Dublin will allow not only for a city of license change/Class C3 upgrade to occur for Lacom/WELT, it also will permit the substitution of Channel 236C3 for Channel 252A at Cordele, and the modification of Station WKKN's license to specify the higher class channel; the substitution of Channel 280C3 for Channel 236A at Montezuma, and the modification of the Station WEGF construction permit to specify the higher class channel; and the substitution of Channel 252C3 for Channel 280C3 at Hawkinsville and the modification of Station WQSY's license to specify the alternate Class C3, all as proposed in RM-9564.<sup>3</sup> The net result there will be three upgraded channels and stations (WELT, WEGF, and WKKN).<sup>4</sup> Second, allotting Channel 276C3 in lieu of Channel 251C3 at East Dublin also allows for the resolution of MM Docket No. 99-259, insofar as that modification clears the way for the allotment of Channel 253A to Soperton, Georgia, as that community's second aural service, as proposed in RM-9685.<sup>5</sup> Finally, allotting Channel 276C3 in lieu of Channel 251C3 at East Dublin also allows for the allocation of Channel 251A to the community of Twin City. This allotment would constitute a first local service to Twin City.<sup>6</sup>

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<sup>3</sup> The sole stockholder of Multi-Service Corp. also is the sole stockholder of Metro Com Corp., licensee of Station WKKN, Cordele, Georgia; Broadcast Equities Corp., permittee of Station WEGF, Montezuma, Georgia; and Tri-County Broadcasting, Inc., licensee of Station WQSY, Hawkinsville, Georgia.

<sup>4</sup> Copies of these Comments and Counterproposal are being filed in MM Docket No. 99-199, and served on all parties thereto.

<sup>5</sup> Copies of these Comments and Counterproposal are being filed in MM Docket No. 99-259, and served on all parties thereto.

<sup>6</sup> As seen in Attachment 2, which is a reproduction of information from the Georgia Municipal Association ("GMA"), Twin City is a member of the GMA, and it has its own elected officials.

Lacom/WELT (the party that filed counterproposals in MM Docket Nos. 99-199 and 99-259) will not be unduly harmed by adoption of this modification to its proposal, insofar as Lacom/WELT still will receive a desired city of license change and Class C3 channel for use by Station WELT(FM), and the Commission routinely warns that “the filing of a counterproposal may lead the Commission to allot a different channel than was requested for any of the communities involved.”<sup>7</sup>

Multi-Service Corp. intends to file for the new facilities at Twin City and Pulaski, and to file the forms necessary for Station WPMX to be licensed to operate on Channel 257C3, upon grant of this proposal.

In summary, Multi-Service proposes the following:

<u>Community</u>	<u>Current</u>	<u>Proposed</u>
Douglas	258C1, 294C1	294C1
Willacoochee	None	258C1
Statesboro	220A, 261C2, 275C3	220A, 261C2, 257C3
Pulaski	None	275A

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<sup>7</sup> The Commission considers channels of the same class to be equivalent unless showings have been made that a station cannot be constructed for reasons such as environmental consequences or air hazards. *See Vero Beach, Florida*, 3 FCC Rcd 1049 (1988), *rev. denied*, 4 FCC 2184 (1989) and *Tawas City, Michigan*, 9 FCC Rcd 4794 (1994), *recon. denied*, 10 FCC Rcd 6108 (1995). Additionally, the fact that the allotment of Channel 276C3 to East Dublin requires a different set of reference coordinates be assigned to the East Dublin allotment is irrelevant. In *Indian Springs, NV, Mountain Pass, CA, et al.*, 14 Fcc Rcd 10568 (Allocations Branch 1999), the Commission observed that once a “petitioner has indicated her willingness to relocate [a station] should it be upgraded....the imposition of a different transmitter site falls within the Commission's existing policy to impose a different site restriction to accommodate an allotment elsewhere.” *Id.* at ¶ 14.

Swainsboro	251A, 263A	263A
East Dublin	None	275C3
Cordele	212A, 252A	212A, 236C3
Montezuma	236A	280C3
Hawkinsville	280C3	252C3
Soperton	291A	253A, 291A
Twin City	None	251A

The Commission's has an established allotment criteria which was set forth initially in *Revision of FM Assignment Policies and Procedures*, 90 F.C.C.2d 88 (1982), which establishes the following allotment priorities:

- (1) first full-time aural service
- (2) second full-time aural service
- (3) first local service
- (4) other public interest matters

Priorities (2) and (3) are given co-equal weight. Under Bullie's proposal, two communities (Douglas and Willacoochee) will receive first local service (Priority "3"). Under the Multi-Service proposal, *three* communities (Willacoochee, plus Pulaski and Twin City) will receive first local service (all Priority "3"), and in addition, two allotments (at Montezuma and Cordele) will receive upgraded service (Priority "4"); another community (Soperton) will receive second local service (Priority "4"); and East Dublin will receive its proposed first local service (Priority "3").

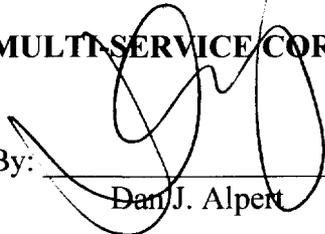
Moreover, the three new communities proposed for first local service by Multi-Service have a total population of 2,935 persons, while the two new communities proposed by Bullie have a

population only of 2,843 persons, and therefore are preferred under that criteria, as well. In short, under the Commission's established criteria, Multi-Service's proposal clearly is superior to that submitted by Bullie Broadcasting Corporation, and should be adopted in lieu of Bullie's proposal.

Accordingly, Multi-Service Corp. respectfully requests that this Counterproposal be adopted, and that the Commission amend the FM Table of Allotments in the manner specified above.

Respectfully submitted,

**MULTI-SERVICE CORP.**

By: 

\_\_\_\_\_  
Dan J. Alpert

Its Attorney

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March 23, 2000

**Counterproposal to MM Doc 00-18  
RM-9790  
by Multi-service Corp.  
Statesboro, Georgia  
March 2000**

This rule making request is filed on behalf of Multi-service Corp., ("MSC"), licensee of WPMX, Statesboro, Georgia and is filed mutually exclusive with MM Docket 00-18, RM-9790 filed by Bullie Broadcasting Corporation, ("Bullie"). While the Bullie proposal creates first service to the two towns of Pembroke and Willacoochee, the MSC counterproposal creates first service to Pulaski, Twin City, East Dublin and Willacoochee as well as expanded service at Cordele and Montezuma (all Georgia towns). Footnote one of MM Docket 00-18 informs us that:

"The licensee of Station WDMG-FM, Jumbo Thing, Inc. (Jumbo Thing)", has consented to the change of its station's community of license and change of transmitter site. Therefore, an Order to Show Cause is not necessary."

MSC also supports the new Willacoochee service and has based its counterproposal on the previously requested Willacoochee reallocation and site change.<sup>1</sup>

Exhibit #1 is a flowchart of the MSC proposal. It assumes Jumbo Thing has changed its city of license from Douglas to Willacoochee. First, MSC requests that WPMX, Channel 275C3 at Statesboro be ordered to Channel 257C3. This would be a lateral channel change at the current WPMX site. Because there

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<sup>1</sup> Willacoochee reference coordinates: 31° 20' 27", 83° 24' 30".

would be no change of site, height or power and only a change of channel, no further demonstration of the city grade coverage of Statesboro is being made. WPMX currently serves Statesboro with the 70 dBu signal.

Upon WPMX vacating Channel 275C3, Channel 275A is open to be allocated as first service to the town of Pulaski.<sup>2</sup> Pulaski has a population of 264 persons and is in Candler County. Exhibit #3A is the Pulaski allocation study and Exhibit #3B is the demonstration of city grade service to Pulaski from the proposed allocation site.

With WPMX moved from Channel 275C3, Channel 276C3 is available to be allocated to East Dublin (see Exhibits #4A and 4B).<sup>3</sup> Lacom Communications, Inc. ("Lacom") filed a counterproposal to MM Docket 99-199 to request first service to East Dublin on Channel 251C3 and simultaneously that Channel 251A be removed from Swainsboro and WELT (formerly WJAT) be ordered to 251C3 at East Dublin. This instant proposal allows Lacom to have its desired Class C3 service at East Dublin (but on Channel 276C3) and removes the mutual exclusivity of the Lacom Counterproposal at East Dublin. It is thought that this instant counterproposal is a resolution to the conflicts between the proposal and counterproposal in Docket 99-199.

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<sup>2</sup> Pulaski reference coordinates: 32° 26' 43", 81° 58' 07". 60 dBu area: 2,459.65 sq. km. 60 dBu population: 51,973.

<sup>3</sup> East Dublin reference coordinates: 32° 31' 58", 82° 55' 41". 60 dBu area: 4,688.37 sq. km. 60 dBu population: 63,542.

Additionally, when Lacom is ordered to Channel 276C3 at East Dublin, Channel 251A is available for allocation as first service to Twin City (see Exhibits #5A-5B)<sup>4</sup>. The town of Twin City is in Emanuel County and has a population of 1,466 persons.

Morgan Dowdy is the proponent of RM 9685, a request to allot channel 253A to Soperton as that community's second FM station. Although this Soperton request is not mutually exclusive with the original Docket 99-199, it is mutually exclusive with the Lacom counterproposal to Docket 99-199. When Lacom is ordered to Channel 276C3 at East Dublin, the Morgan Dowdy proposal at Soperton is also removed from being mutually exclusive and allows a second FM allotment at Soperton.

The original Docket 99-199 requests upgraded service at Cordele and Montezuma as well as a lateral move of frequency at Hawkinsville. The entire original proposal of Docket 99-199 is thought to be grantable when Lacom at East Dublin is ordered to Channel 276C3. No duplication of exhibits is being made regarding the Cordele, Montezuma and Hawkinsville proposal (Docket 99-199) since that stands as filed.

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<sup>4</sup> Twin City reference coordinates: 32° 32' 03", 82° 16' 51". 60 dBu area: 2,482.02 sq. km. 60 dBu population: 27,861.

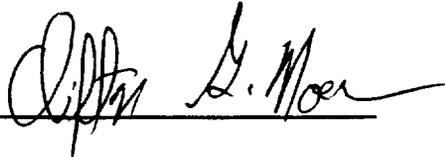
## SUMMARY

It is requested that the following changes in the Table of Allotments be made

City	Present	Proposed
Douglas	258C1, 294C1	294C1
Willacoochee	None	258C1
Statesboro	220A, 261C2 275C3	220A, 261C2 257C3
Pulaski	None	275A
East Dublin	None	276C3
Swainsboro	251A, 263A	263A
Twin City	None	251A
Cordele	212A, 252A	212A, 236C3
Montezuma	236A	280C3
Hawkinsville	280C3	252C3
Soperton	291A	253A, 291A

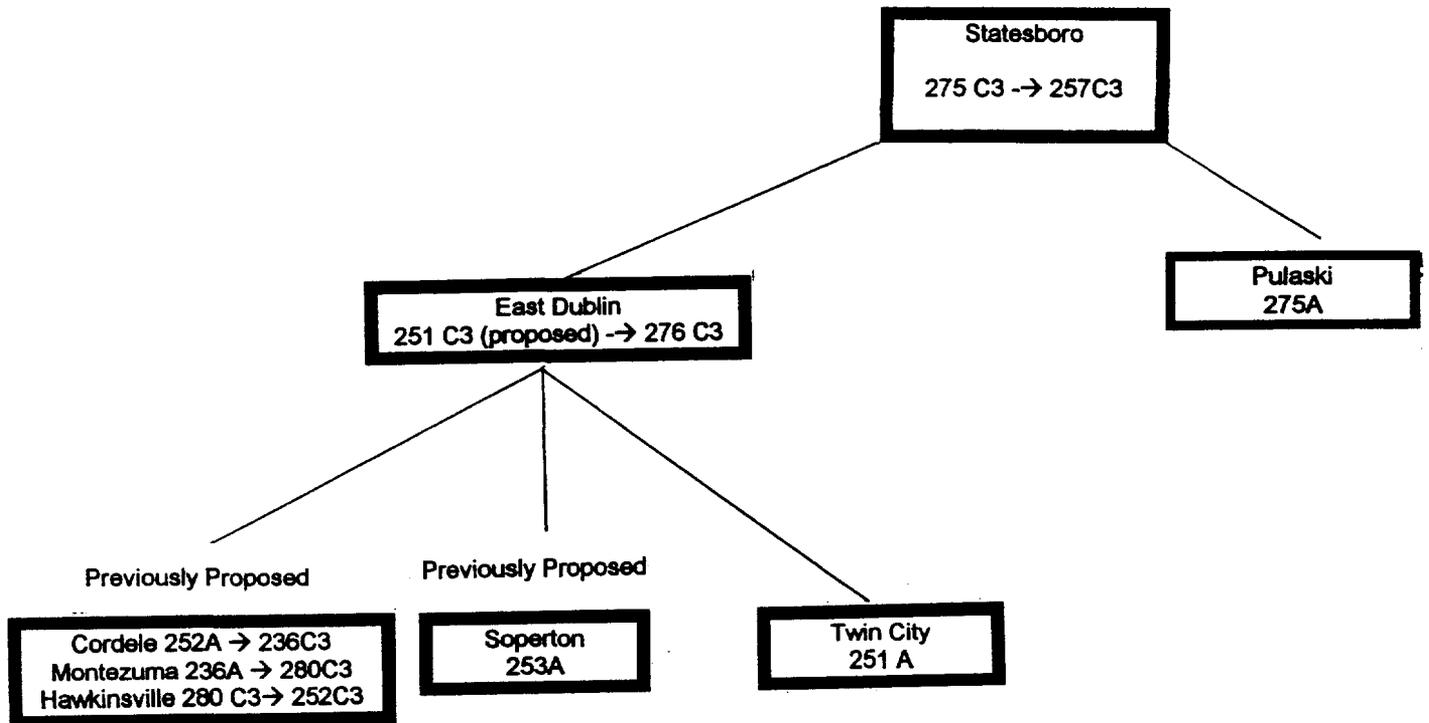
When allocated, Multi-service Corp. states its intention to file for the new facilities at Twin City and Pulaski as well as file the forms necessary to change the WPMX frequency from Channel 275C3 to Channel 257C3.

All information contained herein is thought to be true and correct to the knowledge of the undersigned.

A handwritten signature in black ink, appearing to read "Clifton G. Moor", is written over a horizontal line.

Clifton G. Moor  
Technical Consultant to  
Multi-service Corp.

March 20, 2000



**Flowchart**

**EXHIBIT #1**  
**Counterproposal to MM Doc. 00-18**  
**RM-9790**  
**by Multi-service Corp.**  
**Statesboro, Georgia**  
**March 2000**

**BROMO** BROADCAST  
 TECHNICAL CONSULTANTS  
**COMMUNICATIONS**

Searching at WPMX Site  
Statesboro Georgia

REFERENCE  
32 26 43 N  
81 58 07 W

CLASS = C3  
Current Spacings

DISPLAY DATES  
DATA 03-17-00  
SEARCH 03-19-00

----- Channel 257 - 99.3 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WDMGFM LIC	258C1	Douglas	GA	131.09	217.6	144.0	-12.91
WDMGFM CP	258C1	Douglas	GA	131.55	217.8	144.0	-12.45
WBAWFM LIC	256C3	Barnwell	SC	103.44	33.2	99.0	4.44
WAYS LIC	256C1	Macon	GA	153.13	283.4	144.0	9.13
WAYS.A APP	256C1	Macon	GA	155.20	289.3	144.0	11.20
WKXCFM LIC	258C2	Aiken	SC	133.16	1.6	117.0	16.16
WYKZ LIC	254C1	Beaufort	SC	97.75	97.2	76.0	21.75
WYKZ LIC	254C1	Beaufort	SC	97.83	97.4	76.0	21.83
WHBZ LIC	259C	Port Royal	SC	140.50	90.8	96.0	44.50
WSNTFM LIC	260A	Sandersville	GA	98.19	306.9	42.0	56.19
WQIKFM AUX	256C	Jacksonville	FL	236.15	173.6	176.0	60.15
WQIKFM LIC	256C	Jacksonville	FL	243.55	170.9	176.0	67.55
WMOC LIC	204C2	Lumber City	GA	88.48	229.8	17.0	71.48

**§73.207 Allocation Study**

**EXHIBIT #2**  
**Counterproposal to MM Doc. 00-18**  
**RM-9790**  
**by Multi-service Corp.**  
**Statesboro, Georgia**  
**March 2000**

**BROMO**  
TECHNICAL CONSULTANTS  
**COMMUNICATIONS**

BROADCAST

Searching at Pulaski Reference Site  
Pulaski Georgia

REFERENCE  
32 26 43 N  
81 58 07 W

CLASS = A  
Current Spacings

DISPLAY DATES  
DATA 03-17-00  
SEARCH 03-19-00

----- Channel 275 - 102.9 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
WPMX	LIC 275C3	Statesboro	GA 0.00	0.0	142.0	-142.00
RADD	ADD 276C3	East Dublin	GA 90.70	276.4	89.0	1.70
WGZO.C	CP 276C3	Parris Island	SC 98.33	90.3	89.0	9.33
WMXQ	LIC 275C	Jacksonville	FL 243.55	170.9	226.0	17.55
WBHCFM	LIC 276A	Hampton	SC 90.72	60.5	72.0	18.72
WBHCFM	CP 276A	Hampton	SC 90.72	60.5	72.0	18.72
WYSC	LIC 274A	Mcrae	GA 94.86	243.1	72.0	22.86
WIGL	LIC 275A	Orangeburg	SC 148.13	39.8	115.0	33.13
WIGL.C	CP 275A	Orangeburg	SC 148.13	39.8	115.0	33.13
WVRK	LIC 275C	Columbus	GA 264.84	267.8	226.0	38.84
WFXAFM	LIC 276A	Augusta	GA 117.01	1.6	72.0	45.01
WWSN	LIC 277C	Waycross	GA 142.94	180.1	95.0	47.94
WAJY	LIC 274A	New Ellenton	SC 122.46	14.6	72.0	50.46
WAJY.C	CP 274A	New Ellenton	SC 122.46	14.6	72.0	50.46
WPMA	LIC 274A	Sparta	GA 136.41	315.3	72.0	64.41
WPMA.C	CP 274A	Sparta	GA 136.41	315.3	72.0	64.41
WPEHFM	LIC 221A	Louisville	GA 74.48	328.0	10.0	64.48
WBGA	LIC 273C1	Waycross	GA 142.94	180.1	75.0	67.94

§73.207 Allocation Study

**EXHIBIT #3A**  
**Counterproposal to MM Doc. 00-18**  
**RM-9790**  
by Multi-service Corp.  
Statesboro, Georgia  
March 2000

**BROMO**  
**COMMUNICATIONS**  
BROADCAST  
TECHNICAL CONSULTANTS

Searching at East Dublin Reference Site

REFERENCE  
32 31 58 N  
82 55 41 W

CLASS = C3  
Current Spacings

DISPLAY DATES  
DATA 03-17-00  
SEARCH 03-19-00

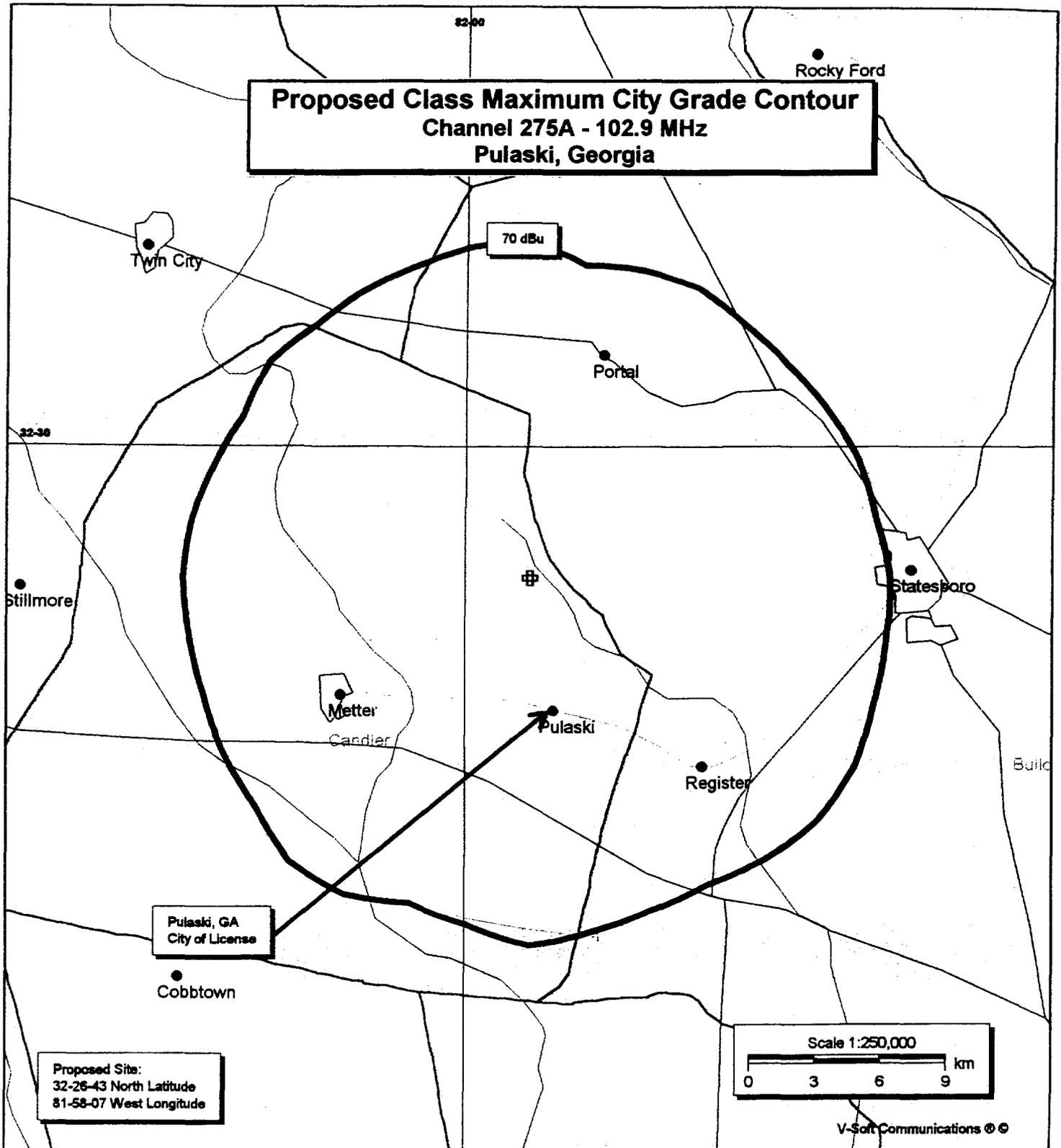
----- Channel 276 - 103.1 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WPMX	LIC 275C3	Statesboro	GA	90.70	95.9	99.0	-8.30
WVRK	LIC 275C	Columbus	GA	175.67	262.9	176.0	-0.33
WFXAFM	LIC 276A	Augusta	GA	141.88	40.5	142.0	-0.12
WWSN	LIC 277C	Waycross	GA	177.46	149.2	176.0	1.46
WVKX	LIC 279A	Irwinton	GA	45.44	328.1	42.0	3.44
WVKX.C	CP 279A	Irwinton	GA	45.44	328.1	42.0	3.44
WYSC	LIC 274A	Mcrae	GA	53.09	173.6	42.0	11.09
WVEE	LIC 277C	Atlanta	GA	189.09	316.5	176.0	13.09
WLCGFM	LIC 273A	Warner Robins	GA	69.85	273.8	42.0	27.85
WBHCFM	LIC 276A	Hampton	SC	172.64	77.9	142.0	30.64
WBHCFM	CP 276A	Hampton	SC	172.64	77.9	142.0	30.64
WGZO.C	CP 276C3	Parris Island	SC	188.76	92.7	153.0	35.76
WBMZ.A	APP 279A	Metter	GA	84.49	99.9	42.0	42.49
AVAC	VAC 279A	Metter	GA	85.01	99.9	42.0	43.01
WPMA.C	CP 274A	Sparta	GA	86.83	355.5	42.0	44.83
WPMA	LIC 274A	Sparta	GA	86.83	355.5	42.0	44.83
WMKS	LIC 222A	Macon	GA	71.73	292.2	12.0	59.73
WULS	LIC 279A	Broxton	GA	105.03	177.2	42.0	63.03
WRIXFM	LIC 276A	Honea Path	SC	212.96	9.6	142.0	70.96

**§73.207 Allocation Study**

**EXHIBIT #4A**  
**Counterproposal to MM Doc. 00-18**  
**RM-9790**  
**by Multi-service Corp.**  
Statesboro, Georgia  
March 2000

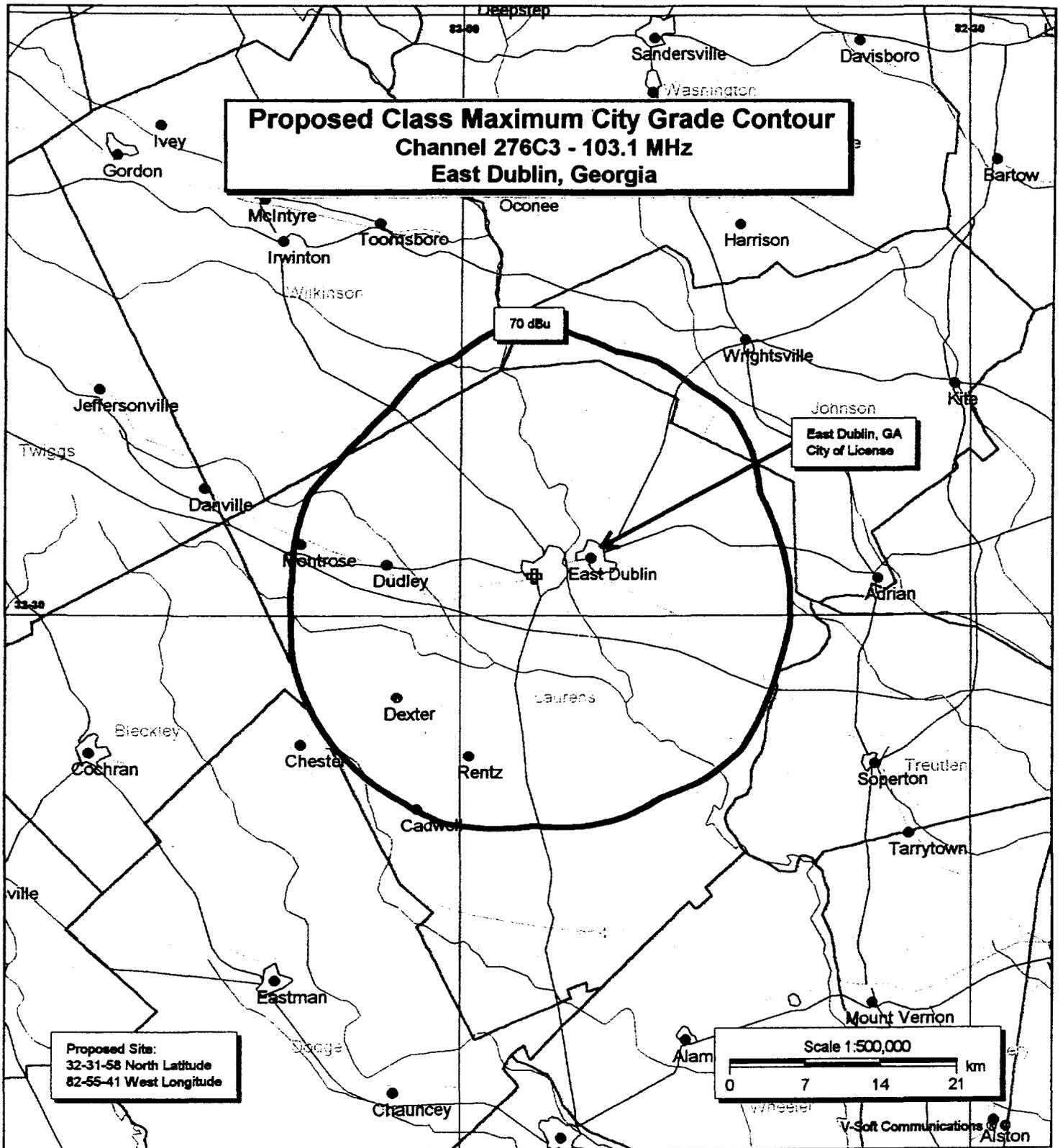
**BROMO**  
**COMMUNICATIONS**  
BROADCAST  
TECHNICAL CONSULTANTS



**EXHIBIT #3B**  
**Counterproposal to MM Doc. 00-18**  
**RM-9790**  
**by Multi-service Corp.**  
**Statesboro, Georgia**

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**Bromo Communications, Inc.**  
**Atlanta, Georgia**  
**March 2000**



**EXHIBIT #4B**  
**Counterproposal to MM Doc. 00-18**  
**RM-9790**  
**by Multi-service Corp.**  
**Statesboro, Georgia**

**Bromo Communications, Inc.**  
 Atlanta, Georgia  
 March 2000

Searching at Twin City Reference

REFERENCE  
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82 16 51 W

CLASS = A  
Current Spacings

DISPLAY DATES  
DATA 03-17-00  
SEARCH 03-20-00

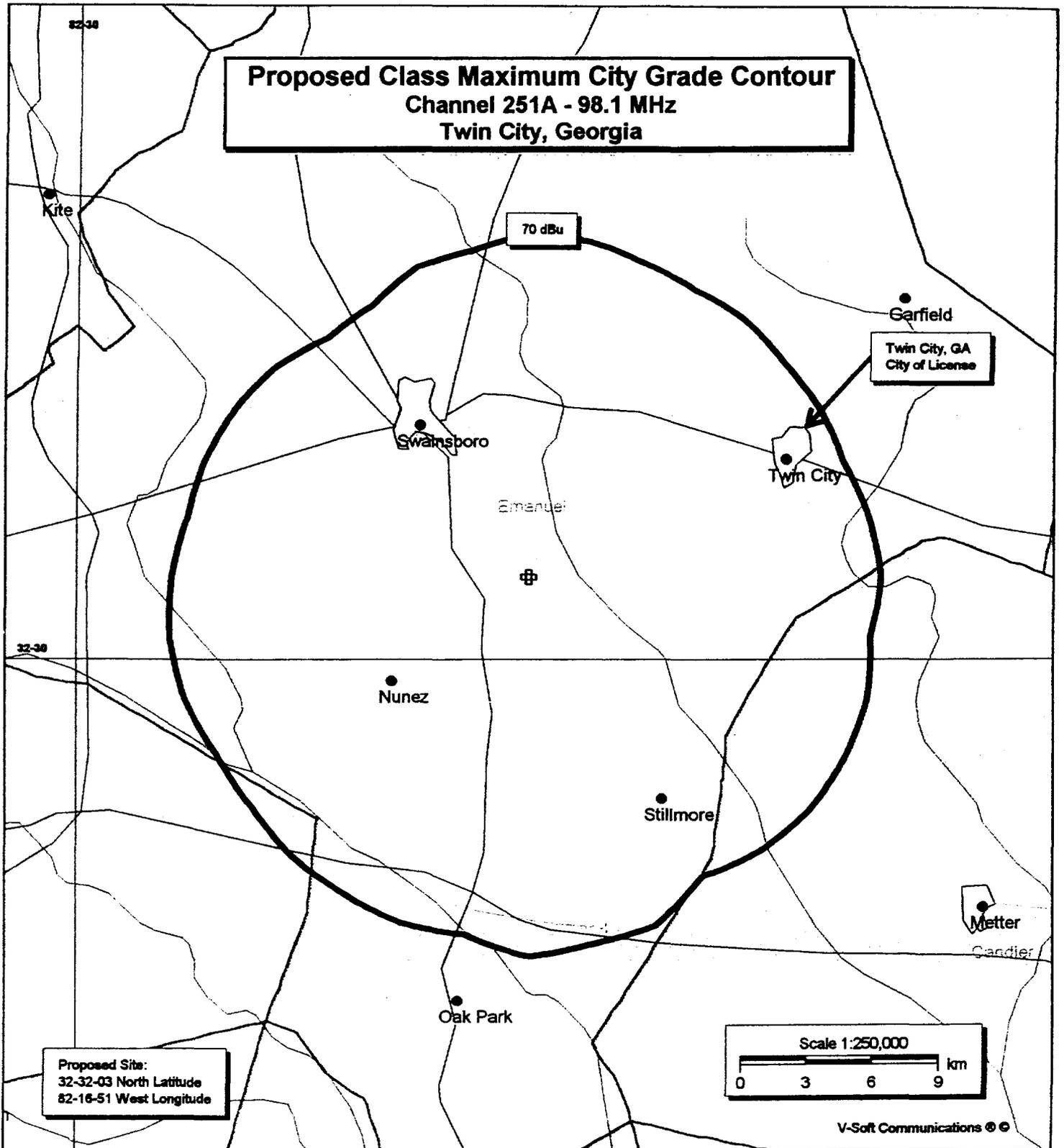
----- Channel 251 - 98.1 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WJATFM	LIC 251A	Swainsboro	GA	9.49	307.0	115.0	-105.51
RDEL	DEL 251A	Swainsboro	GA	9.49	307.0	115.0	-105.51
RADD	ADD 251C3	East Dublin	GA	39.72	273.9	142.0	-102.28
WIIZ	LIC 250C2	Blackville	SC	105.58	52.1	106.0	-0.42
RADD	ADD 253A	Soperton	GA	30.60	221.6	31.0	-0.40
WGCO	LIC 252C1	Midway	GA	134.16	139.5	133.0	1.16
WTCQ	LIC 249A	Vidalia	GA	37.81	202.8	31.0	6.81
WPEK	LIC 251C	Seneca	SC	247.66	344.9	226.0	21.66
RADD	ADD 252C3	Hawkinsville	GA	113.57	255.9	89.0	24.57
WSLT	LIC 252A	Clearwater	SC	110.39	20.0	72.0	38.39
WYBB	LIC 251C2	Folly Beach	SC	209.64	85.4	166.0	43.64
WIBBFM	LIC 250C3	Fort Valley	GA	138.73	272.0	89.0	49.73
WYKZ	LIC 254C1	Beaufort	SC	128.24	99.8	75.0	53.24
WYKZ	LIC 254C1	Beaufort	SC	128.33	99.9	75.0	53.33
WUFFFFM	LIC 248A	Eastman	GA	94.69	249.0	31.0	63.69

**§73.207 Allocation Study**

**EXHIBIT #5A**  
**Counterproposal to MM Doc. 00-18**  
**RM-9790**  
by Multi-service Corp.  
Statesboro, Georgia  
March 2000

**BROMO**  
COMMUNICATIONS  
BROADCAST  
TECHNICAL CONSULTANTS



**EXHIBIT #5B**  
**Counterproposal to MM Doc. 00-18**  
**RM-9790**  
**by Multi-service Corp.**  
**Statesboro, Georgia**

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**Bromo Communications, Inc.**  
**Atlanta, Georgia**  
 March 2000

***ATTACHMENT 1***



# Members

## Pulaski *(updated March 23, 2000)*

[Cities by Name](#)

[Cities by Population Size](#)



**Mail merge files now available!**

PO Box 117  
 Pulaski, GA 30451-0117  
 Phone: (912) 685-2134  
 Fax:

Pop: 264 (90 Census)  
 RDC: Heart of Georgia -  
 Altamaha  
 State Development Region: 9  
 County: Candler

[View Map](#)  
[More on Pulaski from LookSmart](#)

**Senate:** Paul Coverdell, Max Cleland  
**Congressional District:** 1  
**State Senate District:** 20  
**State House District:** 145

### Elected Officials

Mayor: Mr. Monte Tillman  
 Council Member: Mr. Kenny Davis  
 Council Member: Mr. Marty Franklin  
 Council Member: Mr. Paul Greene  
 Council Member: Mr. Ernest Royal

### Appointed Officials

City Clerk: Mr. Tony Franklin  
 City Attorney: Mr. Judd T. Drake

### Area Economic Development Agencies

Metter-Candler County Development Commission  
 PO Box 497  
 Metter, GA 30439-0497  
 Telephone: (912) 685-2134  
 Fax Number: (912) 685-2100

### Area Newspapers

City of Pulaski  
 111  
 Metter, GA 30439-0111  
 Telephone: (912) 685-2134  
 Fax Number: (912) 685-2100

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***ATTACHMENT 2***



## Members

### Twin City *(updated March 23, 2000)*

[Cities by Name](#)

[Cities by Population Size](#)



**Mail merge files now available!**

PO Box 980  
 Twin City, GA 30471-0980  
 Phone: (912) 763-2695  
 Fax: (912) 763-3727

Pop: 1,466 ('90 Census)  
 RDC: Central Savannah River Area  
 State Development Region: 9  
 County: Emanuel

[View Map](#)

[More on Twin City from LookSmart](#)

Senate: Paul Coverdell, Max Cleland  
 Congressional District: 10  
 State Senate District: 20  
 State House District: 144

#### Elected Officials

Mayor: Mr. Johnny E. Baker  
 Council Member: Mr. George E. Archer, Jr.  
 Council Member: Mr. Artie Fields  
 Council Member: Mr. Jimmy Greenway  
 Council Member: Mr. John William Turner

#### Appointed Officials

City Clerk: Ms. Sylvia Bennett

#### Area Economic Development Agencies

Swainsboro Regional Chamber of Commerce  
 124 N Main St  
 Swainsboro, GA 30401-0500  
 Telephone: (912) 233-6626  
 Fax Number: (912) 327-3460

#### Area Newspapers

The Daily  
 PO Box 980  
 Morning News  
 Swainsboro, GA 30401-0980

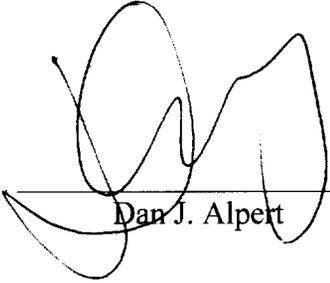
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**CERTIFICATE OF SERVICE**

I, Dan J. Alpert, hereby certify that the foregoing document has been sent to the following parties via First Class Mail, postage prepaid:

J. Geoffrey Bentley, P.C.  
P.O. Box 807  
Herndon, VA 20172-0807



Handwritten signature of Dan J. Alpert, consisting of stylized, overlapping loops and curves, positioned above a horizontal line.

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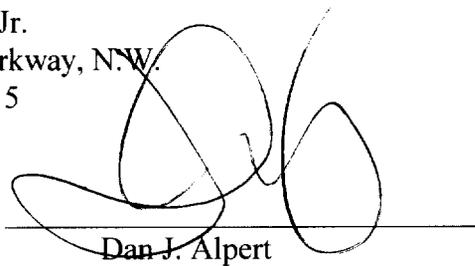
Dan J. Alpert

**CERTIFICATE OF SERVICE**

I, Dan J. Alpert, hereby certify that on March 23, 2000 the foregoing document is being served by First Class Mail, postage prepaid, to the following persons:

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Booth Freret Imlay & Tepper, P.C.  
5101 Wisconsin Ave., N.W.  
Suite 307  
Washington, DC 20016

Lawrence J. Bernard, Jr.  
5224 Chevy Chase Parkway, N.W.  
Washington, DC 20015



Dan J. Alpert