

DOCKET FILE COPY ORIGINAL  
Before the

Federal Communications Commission  
Washington, DC

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
*Amendment of Section 202(b),* )  
*Table of Allotments,* )  
*FM Broadcast Stations* )  
*(Eastman, Georgia)* )  
)  
To: Chief, Allocations Branch )

MM Docket No. 00-56  
RM-9839

**COUNTERPROPOSAL**

Radio Center Corp. hereby submits the following Counterproposal in response to the *Notice of Proposed Rule Making*, DA 00-647 (March 24, 2000) issued in this proceeding. With respect thereto, the following is stated:

Clyde and Connie Lee Scott d/b/a EME Communications has proposed that the Commission allot Channel 221A to Eastman, Georgia. This would provide Eastman with additional its third local aural service.<sup>1</sup> Radio Center proposes that the Table of Allotments instead be modified as follows:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Ellaville, Georgia	----	221A

Ellaville, Georgia is an existing community with a 1990 population of 1,726 persons. It has its own elected officials. Attachment 1. Adoption of this proposal will allow Ellaville to receive its first local service, which is "Priority 3" under the FCC's allotment priorities. *Revision of FM Assignment Policies and Procedures*, 90 F.C.C.2d 88 (1982). This proposal is mutually

<sup>1</sup> Stations WUFF and WUFF-FM currently are licensed to Eastman, Georgia.

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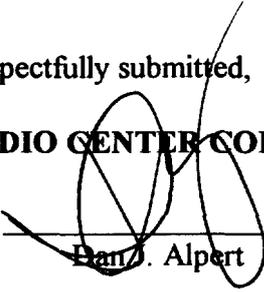
exclusive with the EME proposal for Eastman. In the event Channel 221A is allotted to Ellaville, Radio Center will file an application with the FCC for the allotment, and once granted, will build operate the facility.

Accordingly, Radio Center Corp. respectfully request that this Counterproposal be accepted and considered in this proceeding, and that the FM Table of Allotments be modified in the manner specified herein.

Respectfully submitted,

**RADIO CENTER CORP.**

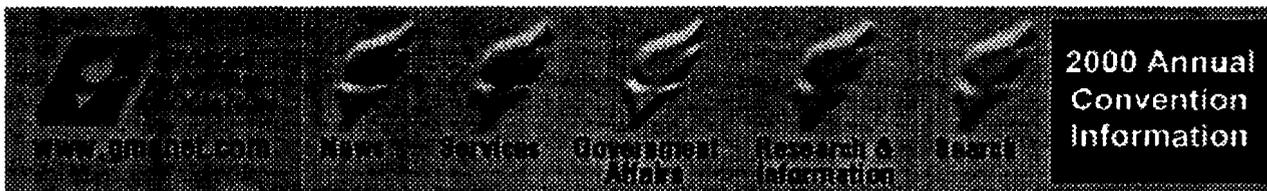
By: \_\_\_\_\_

  
Dan J. Alpert

Its Attorney

*The Law Office of Dan J. Alpert*  
2120 N. 21<sup>st</sup> Rd.  
Arlington, VA 22201  
(703) 243-8690

May 15, 2000

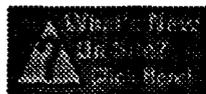


# Members

## Ellaville *(updated May 10, 2000)*

[Cities by Name](#)

[Cities by Population Size](#)



*Mall merge files now available!*

PO Box 839  
 Ellaville, GA 31806-0839  
 Phone: (912) 937-2207  
 Fax: (912) 937-5715

Pop: 1,726 ('90 Census)  
 RDC: Middle Flint  
 State Development Region: B  
 County: Schley

[View Map](#)  
[More on Ellaville from LockSmart](#)

Senate: Paul Coverdell, Max Cleland  
 Congressional District: 2  
 State Senate District: 14  
 State House District: 159

### Elected Officials

Mayor: Mr. Hughes Palmer  
 Council Member: Mr. Steve Arrington  
 Council Member: Mr. Curtis Haynes  
 Council Member: Mr. Samuel Wade  
 Council Member: Ms. Nell Wall  
 Council Member: Mr. Clarence Way

### Appointed Officials

City Manager: Mr. Richard Rowe  
 City Clerk: Ms. Kelly Newcomb  
 City Attorney: Mr. James Skipper

### Area Economic Development Agencies

### Area Newspapers

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**Petition for Rule Making**  
**Radio Center Corp.**  
**Channel 221A – 92.1 MHz**  
**Ellaville, Georgia**  
May 2000

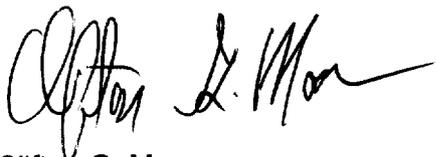
**TECHNICAL COMMENTS**

These comments are filed on behalf of Radio Center Corp., proponent to allot Channel 221A to Ellaville, Georgia. Exhibit #1 is an allocation study indicating that at the reference coordinates of North Latitude 32° 13' 05" and West Longitude 84° 15' 23" the spacing requirements of 73.207 are met or exceeded. From this location, Ellaville, the city of license, is served by the 70 dBu contour as seen in Exhibit #2.

Ellaville is the county seat of Schley County, Georgia. There are no other AM, FM or television services allocated to any city in this county. Ellaville has a population of 1,724 persons and Schley County has a population of 3,588 persons. From the reference coordinates and assuming a class maximum station, 2,464.64 square kilometers would be served and 42,028 persons reside within the 60 dBu contour.

When allotted to Ellaville, Radio Center Corp. will file timely any paperwork necessary to apply for the new station.

All statements made herein are though to be true and correct to the knowledge of the undersigned.



Clifton G. Moor  
Bromo Communications, Inc.

May 11, 2000

**EXHIBIT #1**  
**Petition for Rule Making**  
**Radio Center Corp.**  
**Channel 221A - 92.1 MHz**  
**Ellaville, Georgia**

**\$73.207 ALLOCATION STUDY**

Searching at Allocation Reference Site - Ellaville GA  
Radio Center Corp.

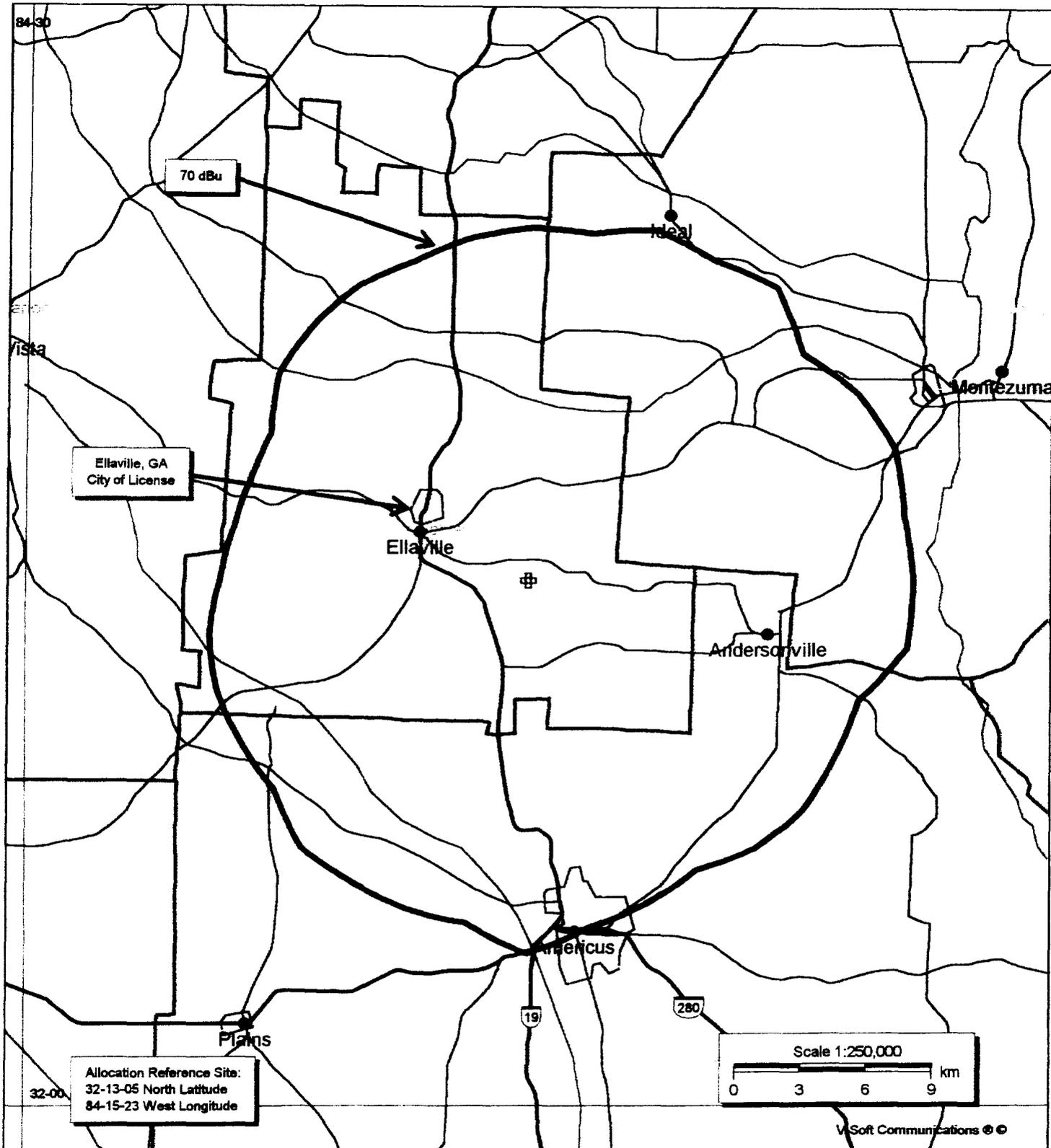
REFERENCE  
32 13 05 N  
84 15 23 W

CLASS = A  
Current Spacings

DISPLAY DATES  
DATA 05-06-00  
SEARCH 05-11-00

----- Channel 221 - 92.1 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
990224	APP 220A	Cuthbert	GA 72.01	224.5	72.0	0.01
WJGAFM	LIC 221A	Jackson	GA 120.53	12.9	115.0	5.53
WMKS	LIC 222A	Macon	GA 84.75	43.0	72.0	12.75
WLWIFM	LIC 222C	Montgomery	AL 183.87	277.0	165.0	18.87
980727	APP 220A	Eufaula	AL 92.35	248.3	72.0	20.35
WVRK	LIC 275C	Columbus	GA 50.65	283.6	29.0	21.65
WIOL.C	CP 224C2	Eufaula	AL 77.34	263.2	55.0	22.34
980604	APP 220A	La Grange	GA 98.15	318.3	72.0	26.15
WDDQ	LIC 221A	Adel	GA 145.02	145.6	115.0	30.02
WJJN	LIC 221A	Columbia	AL 147.13	218.2	115.0	32.13
WUNV	LIC 219A	Albany	GA 63.38	162.8	31.0	32.38
WIOL	LIC 224C2	Eufaula	AL 92.35	248.3	55.0	37.35
981203	APP 220A	La Grange	GA 110.42	324.5	72.0	38.42
981202	APP 220A	La Grange	GA 113.20	320.5	72.0	41.20
981203	APP 220A	La Grange	GA 116.30	321.7	72.0	44.30
WTJB	LIC 219A	Columbus	GA 76.33	287.5	31.0	45.33
WBTRFM	LIC 221A	Carrollton	GA 165.47	334.8	115.0	50.47
AP220	APP 220C3	Toombsboro	GA 139.93	46.6	89.0	50.93
AVAC	VAC 222A	Pelham	GA 124.20	175.1	72.0	52.20
931105	APP 222A	Pelham	GA 126.46	175.8	72.0	54.46
AP220	APP 220A	Milledgeville	GA 128.38	48.9	72.0	56.38
990514	APP 220A	Milledgeville	GA 136.18	45.4	72.0	64.18
WEKS	LIC 223A	Zebulon	GA 96.75	356.0	31.0	65.75
WKZZ.C	CP 223C3	Tifton	GA 116.11	131.1	42.0	74.11



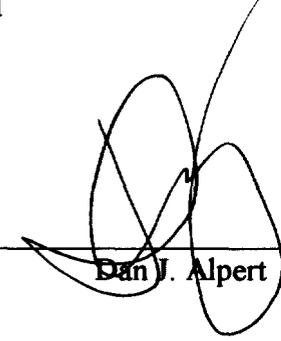
**EXHIBIT #2**  
**CITY GRADE CONTOUR**  
**Petition for Rule Making**  
**Radio Center Corp.**  
**Channel 221A - 92.1 MHz**  
**Ellaville, Georgia**

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

**CERTIFICATE OF SERVICE**

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

EME Communications  
293 JC Saunders Road  
Moultrie, GA 31768



Handwritten signature of Dan J. Alpert, consisting of several overlapping loops and a long vertical stroke extending upwards from the center.

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Dan J. Alpert