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May 30, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

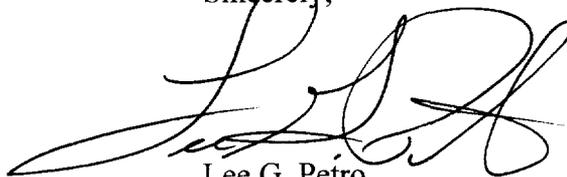
**Re: Comments of Tennessee Valley Radio, Inc.
Amendment of Section 73.202(b)-Table of Allotments-FM Broadcast
Stations (Tullahoma, Tennessee and Madison, Alabama)
MM Docket No. 00-64/RM-9117**

Dear Ms. Salas:

Transmitted herewith, on behalf of Tennessee Valley Radio, Inc., is an original and four (4) copies of its Comments in the above-referenced rulemaking proceeding.

Should there be any questions, please contact undersigned counsel.

Sincerely,



Lee G. Petro

Enclosures

DC01/334496.1

No. of Copies rec'd 014
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Tennessee Valley Radio, Inc.)	MM Docket No. 00-64
)	RM-9117
Amendment of Section 73.202(b), Table of)	
Allotments, FM Broadcast Stations (Tullahoma)	
and Madison, Alabama))	

To: Chief, Allocations Branch
Mass Media Bureau

COMMENTS OF
TENNESSEE VALLEY RADIO, INC.

Pursuant to Section 1.415 of the Commission's rules, 47 C.F.R. § 1.415 (1999), Tennessee Valley Radio, Inc. ("TVRI"), the licensee of Station WPZM(FM), Tullahoma, Tennessee, by and through its attorneys, hereby submits the following Comments in support of the *Notice of Proposed Rulemaking* ("Notice"), released on April 7, 2000. The Notice proposes the reallocation of Channel 227C1 from Tullahoma, Tennessee to Madison, Alabama, and the modification of Station WPZM(FM)'s license accordingly.

In proposing the reallocation from Tullahoma to Madison, the Notice sought additional comment on the overall public interest benefits that would be derived by the reallocation of Channel 227C1 from the larger community of Tullahoma, Tennessee to Madison, Alabama. As discussed more fully below, the reallocation would result in the preferential arrangement of allotments consistent with FM allotment priorities.¹

¹ *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 91 (1992) (establishing the priorities as (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters. [co-equal status given to priorities (2) and (3)]).

BACKGROUND

In its prior pleadings, TVRI established that Madison was a community for allotment purposes, boasting its own mayor, city council, police and fire departments, water sewage system, and school system. Further, TVRI submitted updated population figures as available at that time. Specifically, the Petition for Reconsideration filed on March 27, 1998, noted that Madison's population had increased by 27% from 1990 to 1994, whereas the population of Tullahoma only grew 5% during the same period. *Petition for Reconsideration*, ¶ 10. The result was that the population of Madison was approximately 22,000 in 1995, and that of Tullahoma was only 17,745. Furthermore, TVRI noted that Station WPZM currently provides a 70 dBu signal over the entire Huntsville Urbanized Area, and the proposed reallocation would not modify the technical parameters, thus eliminating the requirement of a *Tuck* analysis.²

While the Notice confirmed that Madison is a community for allotment purposes, and that a *Tuck* analysis would not be required, the Notice cited only the 1990 Census figures (rather than the 1994 figures) which reflects Tullahoma (population 16,761) with a larger population than Madison (population 14,904). As such, the Notice requested that TVRI provide a showing that the reallocation of WPZM from Tullahoma to Madison would benefit the public interest.

DISCUSSION

When a proposed reallocation would not provide either the first or second local service, the Commission turns to the "other public interest matters." *Revision of FM Assignment Policies and Procedures*, *supra* n.1. Under this examination, the Commission "take[s] into account the number of aural services received in the proposed service area, the number of local services, the

² See *Huntington Broadcasting Co. v. FCC*, 192 F.2d 33 (D.C. Cir.) 1951); *RKO General, Inc.*, 5 FCC Rcd 3222 (1990); *Fay and Richard Tuck*, 3 FCC Rcd 5374 (1988) (concerning the "moving into" of radio stations from rural communities to urban centers).

need for or lack of public radio service and other matters such as the relative size of the proposed communities and their growth rate.” *Id.* n.8.

As demonstrated in the attached Engineering Statement Of Mullaney Engineering, Inc., *Exhibit One*, Tullahoma already receives a plethora of other services, including six AM stations, 6 FM stations and 2 FM translators. Further, the reallocation of WPZM would not abandon Tullahoma without its own local service, as it would still receive local service from Station WJIG(AM), while Madison would receive its first local FM service.

As such, under Commission precedent, the most relevant remaining consideration would be the “relative size of the proposed communities and their growth rate.” Attached as Exhibit Two are excerpts from the U.S. Bureau of Census’s *Population Estimates for Cities with Populations of 10,000 and Greater, July 1, 1998*, which demonstrate that from April 1, 1990 through July 1, 1998, the estimated growth of Madison, Alabama was 71%, from 14,792 to 25,400 persons, whereas the estimated growth of Tullahoma, Tennessee was 14.3%, from 16,761 to 19,153 persons.

Additionally, as noted in the attached Engineering Statement, a conversation with the local Tullahoma officials revealed that its 1998 population count was actually 17,357 persons, which, assuming a continued steady growth rate, would place its current population at 17,506 persons, which is a 3.6% increase from Tullahoma’s population in 1990. A similar conversation with Madison officials establishes the its population, as of May 15, 2000, at approximately 29,000 persons, which is a 94.6% increase from Madison’s population in 1990. Also, Madison is now ranked as the 1,171 largest city, whereas Tullahoma is ranked 1,514. *See Exhibit Two.*

In analogous situations, *i.e.*, where the two (or more) proposals do not involve the first three criteria listed above, the Commission will grant the proposal that “will bring the benefits of

a new primary service to the larger population.” *Greenup, Kentucky, and Athens, Ohio*, 2 FCC Rcd 4319, ¶11 (1987). Indeed, the Commission has a long history of favoring those proposals that would expand service to the greatest population.³ Furthermore, the Commission has previously granted reallocation proposals, without the relocation of the transmitter site, based on the relevant “other public interest benefits.” See *Hallie and Ladysmith, Wisconsin*, 10 FCC Rcd 9257 (1995); *Fairbault and Northfield, Minnesota*, 7 FCC Rcd 3937 (1992).

Therefore, not only has Madison’s population exploded nearly 95% in the past ten years, but in real numbers, the population of Madison is approximately 10,000 persons greater than Tullahoma. Thus, it is clear that the reallocation of WPZM from Tullahoma to Madison would result in the preferential arrangement of allotments.

CONCLUSION

The Commission has consistently preferred the allocation of radio stations to the largest possible population. In the instant matter, the reallocation of Station WPZM from Tullahoma to Madison will result in a community with more than 10,000 additional persons receiving their first local FM service, without any loss of service.

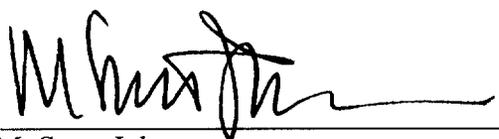
Therefore, Tennessee Valley Radio, Inc. respectfully requests that the Commission reallocate Channel 271C1 from Tullahoma, Tennessee to Madison, Alabama, and to modify the license of Station WPZM(FM) to specify Madison, Alabama as its community of license.

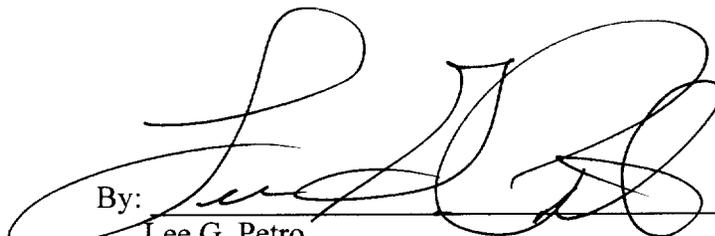
³ See *Okmulgee, Nowata, Pawhuska, Bartlesville, Bixby, Oklahoma, Rogers, Arkansas*, 10 FCC Rcd 12, 014 (1995) (selecting proposal with service to 102,605 more persons), *Ashland, California, Rolla and Monore City, Missouri*, 8 FCC Rcd 1799 (1993) (selecting proposal with service to 8,562 more persons), *Bowling Green and Elizabethtown, Kentucky and Ferdinand, Indiana*, 8 FCC Rcd 2097 (1993) (selecting proposal with service to 4,481 more persons), *Rocky Mount, North Carolina*, 8 FCC Rcd 6206 (1993) (selecting proposal with service to 24,347 more persons), *Spring Grove and Preston, Minnesota, and Mason City, Iowa*, 4 FCC Rcd 5738 (1989) (selecting proposal with service to 1,395 more persons).

Additionally, Tennessee Valley Radio, Inc. certifies that, should the Commission grant the proposed amendment to the Table of FM Allotments, it will file the necessary applications to specify the modified community of license.

Respectfully submitted

TENNESSEE VALLEY RADIO, INC.

By: 
M. Scott Johnson

By: 
Lee G. Petro

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Its Attorneys

May 30, 2000
DC01/334209.1

EXHIBIT ONE

Engineering Statement of Mullaney Engineering, Inc.

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-2:

MM DOCKET: 00-64 - COMMENTS IN SUPPORT

**TENNESSEE VALLEY RADIO, INC.
RADIO STATION WPZM (FM)
PROPOSED CHANGE OF CITY OF LICENSE
EXISTING CH. 227C1 - TULLAHOMA, TN
PROPOSED CH. 227C1 - MADISON, AL**

MAY 27, 2000

**ENGINEERING STATEMENT IN SUPPORT OF
COMMENTS IN SUPPORT
REGARDING A
PETITION FOR RULE MAKING
TO AMEND
THE FM TABLE OF ALLOTMENTS**

MULLANEY ENGINEERING, INC.

ENGINEERING EXHIBIT EE-2:

MM DOCKET: 00-64 - COMMENTS IN SUPPORT

**TENNESSEE VALLEY RADIO, INC.
RADIO STATION WPZM (FM)
PROPOSED CHANGE OF CITY OF LICENSE
EXISTING CH. 227C1 - TULLAHOMA, TN
PROPOSED CH. 227C1 - MADISON, AL**

TABLE OF CONTENTS:

1. Declaration of Engineer
2. Narrative Statement.
3. Figure 1, Other Services to Tullahoma, TN.
4. Figure 2, List of Local Services to Tullahoma, TN.

DECLARATION

I, John J. Mullaney, declare and state that I am a graduate electrical engineer and my qualifications are known to the Federal Communications Commission, and that I am an engineer in the firm of Mullaney Engineering, Inc., and that firm has been retained by Tennessee Valley Radio, Inc., licensee of Radio Station WPZM (FM) in Tullahoma, Tennessee, to prepare an engineering statement in support of a Petition to Amend the FM Table of Allotments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.



John J. Mullaney

Executed on the 27th day of May 2000.

ENGINEERING EXHIBIT EE-2:

MM DOCKET: 00-64 - COMMENTS IN SUPPORT

**TENNESSEE VALLEY RADIO, INC.
RADIO STATION WPZM (FM)
PROPOSED CHANGE OF CITY OF LICENSE
EXISTING CH. 227C1 - TULLAHOMA, TN
PROPOSED CH. 227C1 - MADISON, AL**

NARRATIVE STATEMENT:

I. GENERAL:

This engineering statement has been prepared on behalf of Tennessee Valley Radio, Inc. ("TVRI"), which presently operates FM Station WPZM (FM) on Ch. 227C1 at Tullahoma, Tennessee. The purpose of this statement is to provide comments in support of a petition to amend the FM Table of Allotments to delete a channel at Tullahoma, TN and to re-allot that channel at Madison, AL. In addition, WPZM requests that its license be modified accordingly.

The proposed re-allotment will provide a second local service to the community of Madison, AL.

II. ENGINEERING DISCUSSION:

A. Tullahoma, TN:

The City of Tullahoma has a 1990 population of 16,761 persons and is mainly located in Coffee County with a small part located in Franklin County. According to the Tullahoma City Hall, in a special census count done in 1998 the population was determined to be

17,357 persons. This represents a 3.6% increase during the 8 years since the 1990 U.S. Census and assuming the same rate of growth would represent a 4.4% increase in the year 2000 (17,506 persons).

According to the FCC's CDBS data base, Tullahoma has the following aural services:

WJIG	AM	LIC	740 kHz	0.25 kW	ND-Day
WAUT	FM	CP	203A	1.9 kW	at 54 meters
WTML	FM	CP	218A	1.55 kW	at 82 meters
W203AK	FX	CP	203D	.038 kW	‡
W218BC	FX	LIC	218D	.027 kW	‡

‡ - will cease operation when local full service begins operation.

Figures 1 & 2 are a map and tabulation of 12 aural services that provide service to the city of Tullahoma. Service is provided by six operating AM stations and by six FM stations (four of which are operating facilities & two of which are un-built CPs). It should be noted that since no change of site is proposed, WPZM FM will continue to provide service to Tullahoma.

B. Madison, AL:

The City of Madison has a 1990 population of 14,904 persons and is mainly located in Madison County with a small part located in Limestone County. According to the Madison City Hall, the current population as of May 15, 2000, was estimated to be approximately 29,000 persons. This represents a 94.6% increase over the subsequent 10 years since the 1990 U.S. Census. Based upon the revised population figures obtained from each city, in the year 2000 the City of Madison is estimated to be 67% larger than the City of Tullahoma.

According to the FCC's CDBS data base, Madison has the following aural services:

WUMP	AM	LIC	730 kHz	1.00 kW	ND-Day
W278AA	FX	LIC	278D	0.20 kW	

TVRI acknowledges that the city of Madison is served by more than 5 AM or FM services.

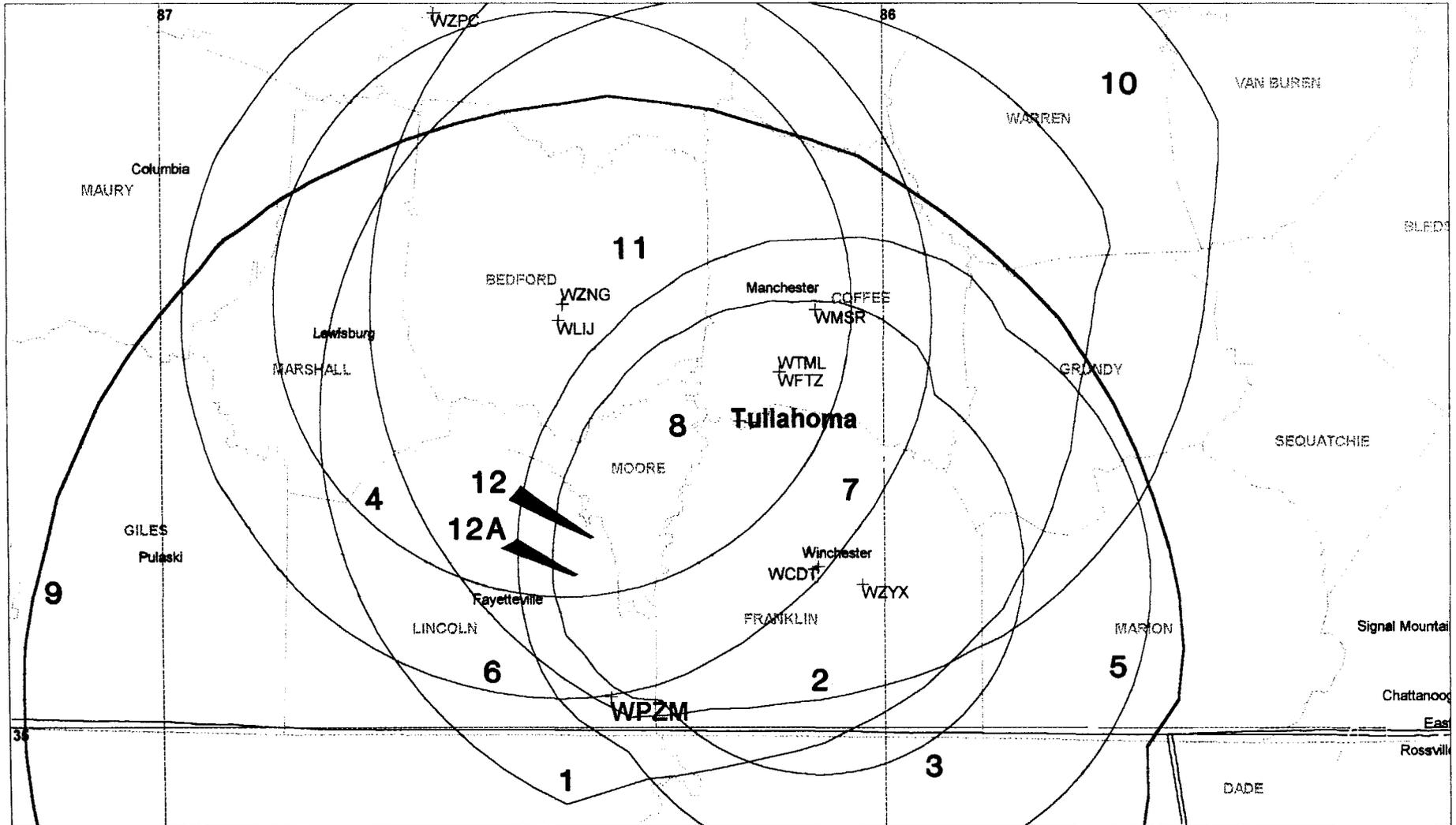
III. SUMMARY:

Tennessee Valley Radio, Inc., Licensee of Radio Station WPZM (FM) herein supports its requests that the FM Table of Allotments be amended to delete Ch. 227C1 at Tullahoma, Tennessee and to re-allot Ch. 227C1 to Madison, Alabama and to modify WPZM's license accordingly.

May 27, 2000.


John J. Mullaney

12 EXISTING AM/FM SERVICES to TULLAHOMA, TN



OTHER SERVICES TO TULLAHOMA, TN

MM DOCKET: 00-64 - COMMENTS IN SUPPORT
 CH. 227C1 - TULLAHOMA, TN - MADISON, AL

MULLANEY ENGINEERING, INC.

GAITHERSBURG, MARYLAND

FIGURE 1

MAY 2000

25 Km



Reference Site: 35-21-00 / 86-13-00 - City of Tullahoma, TN 05/22/00
 Radius 80 KM

City	Freq	kW	Twrs	Hrs	ST	Call Class	Status	Coordinates	Dist(km)	Bearing
TULLAHOMA	740	0.250	1	DAY	TN	WJIG 0D	LIC	BL810804AK 35-20-36 86-12-00	1.7	116.12
TULLAHOMA	740	0.011	1	NIT	TN	WJIG 0D	LIC	35-20-36 86-12-00	1.7	116.12
MANCHESTER	1320	5.0	1	DAY	TN	WMSR 0D	LIC	35-28-03 86-05-42	17.1	40.13
MANCHESTER	1320	0.079	1	NIT	TN	WMSR 0D	LIC	35-28-03 86-05-42	17.1	40.13
WINCHESTER	1340	1.0	1	UNL	TN	WCDD 0C	LIC	35-10-51 86-05-34	21.9	149.09
SHELBYVILLE	1400	1.0	1	UNL	TN	WZNG 0C	LIC	35-28-26 86-26-45	24.9	303.62
COWAN	1440	5.0	1	DAY	TN	WZYX 0D	LIC	BL810203AG 35-09-39 86-01-51	27.0	141.21
COWAN	1440	0.066	1	NIT	TN	WZYX 0D	LIC	35-09-39 86-01-51	27.0	141.21
SHELBYVILLE	1580	5.0	1	DAY	TN	WLIJ 0D	LIC	BL980410KD 35-27-19 86-27-07	24.3	298.83
SHELBYVILLE	1580	0.012	1	NIT	TN	WLIJ 0D	LIC	BL980410KD 35-27-19 86-27-07	24.3	298.83

Six AMs Provide 0.5 mV/M or Better Service to Tullahoma

<p>LIST OF LOCAL SERVICES TO TULLAHOMA, TN MM DOCKET: 00-64 - COMMENTS IN SUPPORT CH. 227C1 - TULLAHOMA, TN - MADISON, AL</p>	<p>MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND FIGURE 2 PAGE 1 OF 2 MAY 2000</p>
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City Chan	Freq	H-ERP	H-HAAT	ST	Call V-ERP	Status V-HAAT	Coordinates	Dist(km)	Bearing
Tullahoma 203A	88.5	1.9	54	TN	WAUT 1.9	CP 54	BPED961120MB 35-20-30 86-11-05	3.0	7 107.72
Tullahoma 218A	91.5	1.55	82	TN	WTML 1.55	CP 82	BPED990903MF 35-23-53 86-08-40	8.5	8 50.76
Tullahoma 227C1	93.3	100.	299	TN	WPZM 100.	LIC 299	BLH890717KC 35-02-04 86-22-52	38.1	9 203.12
Madison 227C1	93.3			AL	WPZMFM	ADD	RM9117 35-02-04 86-22-52	38.1	203.12
Manchester 259C	99.7	100.	395	TN	WWTN 100.	LIC 395	BLH910606KG 35-49-03 86-31-24	58.9	10 332.01
Manchester 268A	101.5	3.00	100	TN	WFTZ 3.00	LIC 100	BLH921123KC 35-23-51 86-08-39	8.4	11 51.20
Shelbyville 275C1	102.9	100.	247	TN	WZPC 100.	LIC 247	BLH890619KD 35-48-01 86-37-17	62.0	12 323.95
Shelbyville 275C1	102.9	100.	291	TN	WZPC 100.	CP 291	BMPH981208IE 35-48-01 86-37-17	62.0	323.95
Note: CP also provides service.									
Tullahoma 203D	88.5	.038	55	TN	W203AK .038	CP 55	BPFT940208TA 35-20-30 86-11-05	3.0	107.72
Tullahoma 218D	91.5	.027		TN	W218BC .027	LIC	BLFT990119TF 35-22-54 86-13-30	3.6	347.89

Six FMs Provide 1.0 mV/M or Better Service to Tullahoma
 (4 Lic & 2 CPs and 2 translators which are MX with CPs)

<p>LIST OF LOCAL SERVICES TO TULLAHOMA, TN MM DOCKET: 00-64 - COMMENTS IN SUPPORT CH. 227C1 - TULLAHOMA, TN - MADISON, AL</p>	<p>MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND FIGURE 2 PAGE 2 OF 2 MAY 2000</p>
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EXHIBIT TWO

Population Figures from U.S. Census Bureau

(SU-98-7) Population Estimates for Places: Annual Time Series, July 1, 1990 to July 1, 1998
 (includes revised April 1, 1990 census population counts)

Source: Population Estimates Program, Population Division, U.S. Census Bureau, Washington, DC 20233
 Contact: Statistical Information Staff, Population Division, U.S. Census Bureau, (301) 457-2422

Internet Release Date: June 30 1999

Block 1 of 2

FIPS State/County/Place Code and Area Name	7/1/98 Estimated Population	7/1/97 Estimated Population	7/1/96 Estimated Population	7/1/95 Estimated Population	7/1/94 Estimated Population
01 000 00124 Abbeville city, AL	3077	3081	3081	3135	3179
01 000 00460 Adamsville city, AL	5026	5004	5164	5459	5469
01 000 00484 Addison town, AL	679	674	669	660	655
01 000 00676 Akron town, AL	484	478	478	477	476
01 000 00820 Alabaster city, AL	23760	22544	20073	18571	17807
01 000 00988 Albertville city, AL	16867	16706	16545	16309	15970
01 000 01132 Alexander City city, AL	16024	15912	15743	15509	15449
01 000 01228 Aliceville city, AL	2937	2946	2970	2914	2939
01 000 01396 Allgood town, AL	599	574	551	529	507
01 000 01660 Altoona town, AL	934	945	950	982	987
01 000 01708 Andalusia city, AL	8907	9015	9119	9179	9173
01 000 01756 Anderson town, AL	344	342	343	343	342
01 000 01852 Anniston city, AL	25524	25854	25995	26292	26387
01 000 02116 Arab city, AL	7467	7446	7366	7228	7097
01 000 02260 Ardmore town, AL	1165	1142	1137	1135	1132
01 000 02320 Argo town, AL	1395	1369	1345	1310	1269
01 000 02428 Ariton town, AL	711	715	751	810	832
01 000 02500 Arley town, AL	367	367	364	358	354
01 000 02836 Ashford city, AL	1993	1985	1986	1980	1968
01 000 02860 Ashland city, AL	2117	2109	2082	2067	2063
01 000 02908 Ashville town, AL	1750	1722	1707	1666	1618
01 000 02956 Athens city, AL	19720	19370	19058	18878	18582
01 000 03004 Atmore city, AL	8169	8124	8078	8175	8197
01 000 03028 Attalla city, AL	6847	6877	6903	7107	7134
01 000 03076 Auburn city, AL	40425	39140	37951	37550	36498
01 000 03220 Autaugaville town, AL	762	756	746	734	723
01 000 03364 Avon town, AL	517	507	493	488	482
01 000 03556 Babbie town, AL	645	637	629	617	604
01 000 03676 Baileyton town, AL	375	373	372	368	369
01 000 03940 Banks town, AL	192	193	194	193	194
01 000 04660 Bay Minette city, AL	8166	8045	7914	7742	7681
01 000 04684 Bayou La Batre city, AL	2456	2519	2573	2679	2797
01 000 04852 Bear Creek town, AL	983	975	967	952	936
01 000 04900 Beatrice town, AL	435	440	445	448	449
01 000 04948 Beaverton town, AL	324	321	321	322	320
01 000 05164 Belk town, AL	266	266	264	261	259

01 000 45316	Macedonia town, AL	316	312	309	304	301
01 000 45472	McIntosh town, AL	253	254	253	253	252
01 000 45496	McKenzie town, AL	436	442	446	448	453
01 000 45640	McMullen town, AL	113	114	112	114	112
01 000 45784	Madison city, AL	25400	23812	23200	22717	22615
01 000 45904	Madrid town, AL	263	249	236	222	215
01 000 46264	Malvern town, AL	606	597	593	593	587
01 000 46504	Maplesville town, AL	826	815	797	774	761
01 000 46696	Margaret town, AL	825	815	806	788	769
01 000 46768	Marion city, AL	4151	4126	4077	4289	4141
01 000 47728	Maytown town, AL	645	642	662	702	705
01 000 48052	Memphis town, AL	60	58	59	57	55
01 000 48064	Mentone town, AL	467	465	468	473	481
01 000 48376	Midfield city, AL	5150	5175	5404	5778	5827
01 000 48400	Midland City town, AL	1834	1830	1916	2023	2077
01 000 48424	Midway town, AL	445	445	449	447	454
01 000 48712	Millbrook city, AL	10824	10021	8976	8213	7684
01 000 48808	Millport town, AL	1196	1203	1206	1216	1214
01 000 48832	Millry town, AL	821	817	813	806	798
01 000 50000	Mobile city, AL	202181	202281	202282	202169	202256
01 000 50192	Monroeville city, AL	6924	7034	7167	7251	7241
01 000 50312	Montevallo city, AL	4469	4440	4443	4525	4507
01 000 51000	Montgomery city, AL	197014	197427	197459	197602	197351
01 000 51096	Moody town, AL	6470	6349	6143	5984	5714
01 000 51264	Mooreville town, AL	56	56	56	56	56
01 000 51456	Morris town, AL	1804	1741	1689	1679	1569
01 000 51520	Mosses town, AL	1109	1097	1093	1099	1081
01 000 51600	Moulton city, AL	3236	3251	3262	3267	3261
01 000 51648	Moundville town, AL	1368	1354	1361	1361	1359
01 000 51672	Mountainboro town, AL	263	263	264	272	273
01 000 51696	Mountain Brook city, AL	18497	18492	19363	20744	20869
01 000 52608	Mount Vernon town, AL	1125	1125	1127	1144	1163
01 000 52776	Mulga town, AL	258	259	272	291	294
01 000 53016	Muscle Shoals city, AL	10966	10789	10517	10225	9979
01 000 53112	Myrtlewood town, AL	191	193	194	197	197
01 000 53256	Napier Field town, AL	503	495	489	481	475
01 000 53400	Nauvoo town, AL	243	243	244	241	241
01 000 53448	Nectar town, AL	277	270	263	258	251
01 000 53472	Needham town, AL	96	96	97	97	98
01 000 53784	Newbern town, AL	231	228	229	228	227
01 000 53856	New Brockton town, AL	1204	1205	1219	1239	1238
01 000 54168	New Hope city, AL	2998	2844	2790	2729	2729
01 000 54432	New Site town, AL	689	683	684	675	678
01 000 54480	Newton town, AL	1582	1584	1655	1773	1813
01 000 54600	Newville town, AL	502	505	507	516	526
01 000 55044	North Courtland town, AL	1064	1055	1042	1027	1011
01 000 55152	North Johns town, AL	174	174	179	192	191
01 000 55200	Northport city, AL	20247	20223	20100	20184	19564
01 000 55440	Notasulga town, AL	916	926	931	938	937
01 000 55752	Oak Grove town, AL	477	468	462	456	449
01 000 55848	Oak Hill town, AL	24	25	26	25	26
01 000 55992	Oakman town, AL	839	841	842	841	841
01 000 56400	Odenville town, AL	926	916	905	886	865
01 000 56472	Ohatchee town, AL	1095	1090	1076	1071	1060

(SU-98-7) Population Estimates for Places: Annual Time Series, July 1, 1990 to July 1, 1998
 (includes revised April 1, 1990 census population counts)

Source: Population Estimates Program, Population Division, U.S. Census Bureau, Washington, DC 20233
 Contact: Statistical Information Staff, Population Division, U.S. Census Bureau, (301) 457-2422

Internet Release Date: June 30 1999

Block 1 of 2

FIPS State/County/Place Code and Area Name	7/1/98 Estimated Population	7/1/97 Estimated Population	7/1/96 Estimated Population	7/1/95 Estimated Population	7/1/94 Estimated Population
47 000 00200 Adams city, TN	638	634	632	629	615
47 000 00240 Adamsville town, TN	1770	1763	1763	1774	1774
47 000 00440 Alamo town, TN	2416	2407	2395	2400	2359
47 000 00540 Alcoa city, TN	7348	7259	7119	7051	6922
47 000 00620 Alexandria town, TN	757	751	742	742	732
47 000 00640 Algood town, TN	3061	3023	2914	2835	2755
47 000 00660 Allardt city, TN	657	648	642	636	627
47 000 00940 Altamont town, TN	741	731	719	709	703
47 000 01640 Ardmore city, TN	1061	1022	1003	970	943
47 000 01740 Arlington town, TN	1483	1479	1489	1509	1517
47 000 02180 Ashland City town, TN	3047	3048	2996	2953	2920
47 000 02320 Athens city, TN	13486	13415	13267	13143	12894
47 000 02340 Atoka town, TN	2724	2393	2093	1864	1621
47 000 02380 Atwood town, TN	1136	1125	1118	1111	1097
47 000 02400 Auburntown town, TN	265	265	259	255	251
47 000 02780 Baileyton town, TN	374	340	310	309	307
47 000 03078 Baneberry city, TN	341	325	307	298	275
47 000 03440 Bartlett city, TN	35391	34867	34758	33552	32267
47 000 03680 Baxter town, TN	1481	1456	1435	1413	1389
47 000 04240 Beersheba Springs town, TN	617	613	607	604	600
47 000 04460 Bell Buckle town, TN	341	344	342	338	336
47 000 04620 Belle Meade city, TN	2753	2792	2836	2848	2855
47 000 04720 Bells city, TN	1655	1647	1633	1631	1615
47 000 05040 Benton town, TN	1082	1065	1042	1041	1023
47 000 05140 Berry Hill city, TN	760	776	786	795	798
47 000 05380 Bethel Springs town, TN	805	794	792	787	779
47 000 05860 Big Sandy town, TN	569	566	558	552	540
47 000 06340 Blaine city, TN	1426	1409	1390	1365	1344
47 000 06960 Bluff City city, TN	1471	1468	1406	1402	1396
47 000 07180 Bolivar city, TN	5934	5972	6019	6103	6089
47 000 07840 Braden town, TN	344	340	334	326	327
47 000 07860 Bradford town, TN	1135	1144	1143	1142	1131
47 000 08280 Brentwood city, TN	23331	22651	22123	21328	20337
47 000 08500 Brighton town, TN	1186	1101	1055	953	831
47 000 08540 Bristol city, TN	23109	23170	23169	23330	23255
47 000 08920 Brownsville city, TN	10003	10107	10095	10050	9914

47 000 67540 Sharon town, TN	1024	1029	1035	1049	1047
47 000 67760 Shelbyville city, TN	14931	14739	14401	14099	14042
47 000 68540 Signal Mountain town, TN	7114	7105	7032	7035	7034
47 000 68560 Silerton town, TN	60	60	59	59	59
47 000 69080 Slayden town, TN	119	117	114	112	111
47 000 69320 Smithville town, TN	3880	3868	3841	3804	3791
47 000 69420 Smyrna town, TN	16864	15983	15200	14868	14720
47 000 69460 Sneedville town, TN	1654	1610	1509	1447	1446
47 000 69560 Soddy-Daisy city, TN	8532	8380	8335	8242	8240
47 000 69620 Somerville town, TN	1910	1972	2008	2053	2047
47 000 69680 South Carthage town, TN	953	930	902	853	851
47 000 69900 South Fulton city, TN	2627	2633	2663	2691	2688
47 000 70060 South Pittsburg city, TN	3216	3217	3254	3297	3295
47 000 70180 Sparta city, TN	4765	4739	4710	4693	4681
47 000 70240 Spencer town, TN	1168	1132	1133	1126	1125
47 000 70400 Spring City town, TN	2297	2260	2219	2202	2199
47 000 70500 Springfield city, TN	11663	11525	11410	11279	11227
47 000 70580 Spring Hill town, TN	2439	2244	2047	1477	1464
47 000 70820 Stanton town, TN	481	485	486	486	487
47 000 70840 Stantonville town, TN	270	267	268	265	264
47 000 72140 Sunbright city, TN	585	577	572	569	568
47 000 72380 Surgoinsville town, TN	1547	1526	1509	1501	1499
47 000 72540 Sweetwater city, TN	5198	5123	5070	5075	5066
47 000 73120 Tazewell town, TN	2241	2211	2182	2154	2150
47 000 73260 Tellico Plains town, TN	688	673	664	658	657
47 000 73460 Tennessee Ridge city, TN	1324	1303	1279	1268	1271
47 000 73900 Thompson's Station city, TN	802	764	735	710	703
47 000 74540 Tiptonville town, TN	2226	2151	2135	2143	2149
47 000 74640 Toone town, TN	281	282	280	279	279
47 000 74860 Townsend city, TN	383	363	348	330	329
47 000 74880 Tracy City town, TN	1563	1566	1563	1560	1556
47 000 75000 Trenton city, TN	4739	4766	4800	4844	4836
47 000 75100 Trezevant town, TN	891	882	882	876	874
47 000 75160 Trimble town, TN	712	699	698	696	694
47 000 75240 Troy town, TN	1057	1049	1051	1048	1047
47 000 75320 Tullahoma city, TN	17645	17370	17128	16816	16761
47 000 75560 Tusculum city, TN	2128	2108	2070	2060	2057
47 000 75940 Union City city, TN	10366	10397	10493	10526	10513
47 000 76860 Vanleer town, TN	390	383	376	371	369
47 000 77400 Viola town, TN	124	123	124	123	123
47 000 77480 Vonore town, TN	632	614	606	606	605
47 000 77540 Walden town, TN	1605	1573	1553	1523	1523
47 000 78100 Wartburg city, TN	925	923	925	934	932
47 000 78120 Wartrace town, TN	504	498	486	496	494
47 000 78240 Watauga city, TN	406	400	395	390	389
47 000 78320 Watertown city, TN	1263	1256	1254	1256	1250
47 000 78560 Waverly city, TN	4076	4023	4014	4016	4019
47 000 78600 Waynesboro city, TN	1959	1950	1894	1828	1824
47 000 79420 Westmoreland town, TN	1800	1761	1730	1733	1726
47 000 79980 White Bluff town, TN	2114	2070	2027	2000	1988
47 000 80200 White House city, TN	3814	3490	3188	3000	2987
47 000 80360 White Pine town, TN	1982	1903	1850	1777	1771
47 000 80540 Whiteville town, TN	1062	1059	1052	1050	1050
47 000 80620 Whitwell city, TN	1574	1575	1597	1623	1622

(SU-98-4) Population Estimates for Cities with Populations of 10,000 and Greater (Sorted Within State by 1990-98 Percent Population Change): July 1, 1998 (includes revised April 1, 1990 census population counts)

Source: Population Estimates Program, Population Division, U.S. Census Bureau, Washington, DC 20233
 Contact: Statistical Information Staff, Population Division, U.S. Census Bureau, (301) 457-2422

Internet Release Date: June 30 1999

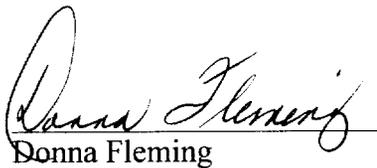
FIPS State/County/Place Code and Area Name	7/1/98 Estimated Population	4/1/90 Census Population	Numeric Population Change 1990-98	Percent Population Change 1990-98	State Size Rank 1998	Percent Change 1990-98, Rank in State	U.S. Size Rank 1998
01 000 48712 Millbrook city, AL	10,824	6,046	4,778	79.0	49	1	2438
01 000 45784 Madison city, AL	25,400	14,792	10,608	71.7	17	2	1171
01 000 00820 Alabaster city, AL	23,760	14,619	9,141	62.5	19	3	1237
01 000 58848 Pelham city, AL	14,146	9,356	4,790	51.2	34	4	1967
01 000 35896 Hoover city, AL	59,551	39,988	19,563	48.9	6	5	448
01 000 76944 Trussville city, AL	11,516	8,283	3,233	39.0	44	6	2305
01 000 19648 Daphne city, AL	15,687	11,291	4,396	38.9	30	7	1801
01 000 25240 Fairhope city, AL	12,734	9,189	3,545	38.6	39	8	2130
01 000 58896 Pell City city, AL	10,399	7,945	2,454	30.9	51	9	2501
01 000 62328 Prattville city, AL	25,769	19,816	5,953	30.0	15	10	1160
01 000 03076 Auburn city, AL	40,425	33,830	6,595	19.5	10	11	726
01 000 55200 Northport city, AL	20,247	17,297	2,950	17.1	24	12	1433
01 000 02956 Athens city, AL	19,720	16,901	2,819	16.7	25	13	1470
01 000 00988 Albertville city, AL	16,867	14,507	2,360	16.3	28	14	1698
01 000 57576 Oxford city, AL	11,031	9,537	1,494	15.7	46	15	2394
01 000 53016 Muscle Shoals city, AL	10,966	9,611	1,355	14.1	48	16	2407
01 000 33448 Hartselle city, AL	12,431	11,114	1,317	11.8	43	17	2168
01 000 78552 Vestavia Hills city, AL	21,838	19,550	2,288	11.7	22	18	1341
01 000 57048 Opelika city, AL	24,490	22,122	2,368	10.7	18	19	1210
01 000 68160 Saraland city, AL	12,976	11,784	1,192	10.1	38	20	2108
01 000 37000 Huntsville city, AL	175,979	159,880	16,099	10.1	4	21	109
01 000 20104 Decatur city, AL	54,694	49,917	4,777	9.6	8	22	508
01 000 59472 Phenix City city, AL	27,353	25,311	2,042	8.1	14	23	1085
01 000 18976 Cullman city, AL	14,437	13,367	1,070	8.0	32	24	1942
01 000 24184 Enterprise city, AL	21,663	20,119	1,544	7.7	23	25	1353
01 000 01132 Alexander City city, AL	16,024	14,917	1,107	7.4	29	26	1769
01 000 41968 Leeds city, AL	10,750	10,009	741	7.4	50	27	2448
01 000 26896 Florence city, AL	39,098	36,426	2,672	7.3	11	28	758
01 000 77256 Tuscaloosa city, AL	83,376	77,866	5,510	7.1	5	29	286
01 000 27616 Fort Payne city, AL	12,648	11,838	810	6.8	41	30	2140
01 000 21184 Dothan city, AL	57,069	54,131	2,938	5.4	7	31	480
01 000 38416 Jasper city, AL	14,110	13,553	557	4.1	35	32	1971
01 000 51000 Montgomery city, AL	197,014	190,350	6,664	3.5	3	33	85
01 000 76920 Troy city, AL	13,487	13,051	436	3.3	36	34	2040
01 000 68736 Scottsboro city, AL	14,215	13,786	429	3.1	33	35	1963
01 000 24568 Eufaula city, AL	13,463	13,220	243	1.8	37	36	2045
01 000 50000 Mobile city, AL	202,181	199,973	2,208	1.1	2	37	82
01 000 74352 Sylacauga city, AL	12,518	12,520	-2	-0.0	42	38	2154
01 000 28696 Gadsden city, AL	42,158	42,523	-365	-0.9	9	39	688
01 000 36448 Hueytown city, AL	14,978	15,280	-302	-2.0	31	40	1871

45 000 00550	Aiken city, SC	22,861	20,386	2,475	12.1	15	6 1289
45 000 14950	Clemson city, SC	12,336	11,145	1,191	10.7	24	7 2179
45 000 12655	Cayce city, SC	11,936	10,824	1,112	10.3	25	8 2242
45 000 61405	Rock Hill city, SC	46,218	42,112	4,106	9.8	5	9 622
45 000 29815	Goose Creek city, SC	26,673	24,692	1,981	8.0	11	10 1113
45 000 70270	Summerville town, SC	24,292	22,519	1,773	7.9	14	11 1218
45 000 50695	North Augusta city, SC	16,307	15,684	623	4.0	18	12 1745
45 000 49075	Myrtle Beach city, SC	25,284	24,848	436	1.8	13	13 1181
45 000 16000	Columbia city, SC	110,840	110,734	106	0.1	1	14 192
45 000 75850	West Columbia city, SC	10,941	10,974	-33	-0.3	27	15 2414
45 000 28060	Gaffney city, SC	13,078	13,149	-71	-0.5	20	16 2091
45 000 66580	Simpsonville town, SC	11,661	11,744	-83	-0.7	26	17 2283
45 000 32065	Hanahan city, SC	13,047	13,176	-129	-1.0	21	18 2095
45 000 01360	Anderson city, SC	26,098	26,385	-287	-1.1	12	19 1140
45 000 70405	Sumter city, SC	40,518	40,977	-459	-1.1	8	20 722
45 000 25810	Florence city, SC	29,511	29,913	-402	-1.3	10	21 1006
45 000 13330	Charleston city, SC	87,044	88,256	-1,212	-1.4	2	22 269
45 000 30850	Greenville city, SC	56,436	58,256	-1,820	-3.1	4	23 493
45 000 50875	North Charleston city, SC	68,072	70,304	-2,232	-3.2	3	24 376
45 000 35890	Irmo town, SC	10,850	11,284	-434	-3.8	28	25 2432
45 000 68290	Spartanburg city, SC	40,954	43,479	-2,525	-5.8	7	26 712
45 000 30895	Greenwood city, SC	19,536	20,807	-1,271	-6.1	16	27 1479
45 000 53080	Orangeburg city, SC	12,733	13,772	-1,039	-7.5	23	28 2131
46 000 66700	Vermillion city, SD	11,967	10,034	1,933	19.3	9	1 2236
46 000 59020	Sioux Falls city, SD	116,762	100,836	15,926	15.8	1	2 179
46 000 69300	Watertown city, SD	19,909	17,623	2,286	13.0	4	3 1457
46 000 73060	Yankton city, SD	14,325	12,703	1,622	12.8	7	4 1953
46 000 52980	Rapid City city, SD	57,513	54,523	2,990	5.5	2	5 474
46 000 07580	Brookings city, SD	17,138	16,270	868	5.3	5	6 1672
46 000 43100	Mitchell city, SD	14,386	13,798	588	4.3	6	7 1948
46 000 49600	Pierre city, SD	13,267	12,906	361	2.8	8	8 2066
46 000 00100	Aberdeen city, SD	24,865	24,995	-130	-0.5	3	9 1199
46 000 31060	Huron city, SD	11,778	12,448	-670	-5.4	10	10 2270
47 000 41200	La Vergne city, TN	15,072	7,496	7,576	101.1	32	1 1862
47 000 16420	Collierville town, TN	23,720	14,501	9,219	63.6	18	2 1239
47 000 69420	Smyrna town, TN	22,686	14,720	7,966	54.1	23	3 1295
47 000 27740	Franklin city, TN	30,925	20,098	10,827	53.9	15	4 969
47 000 67120	Sevierville town, TN	10,662	7,178	3,484	48.5	43	5 2459
47 000 08280	Brentwood city, TN	23,331	16,392	6,939	42.3	19	6 1261
47 000 25760	Farragut town, TN	16,805	12,802	4,003	31.3	29	7 1703
47 000 03440	Bartlett city, TN	35,391	27,038	8,353	30.9	13	8 836
47 000 51560	Murfreesboro city, TN	58,430	44,922	13,508	30.1	6	9 464
47 000 15160	Clarksville city, TN	97,978	75,542	22,436	29.7	5	10 228
47 000 46380	Maryville city, TN	23,308	19,208	4,100	21.3	20	11 1264
47 000 33280	Hendersonville city, TN	38,625	32,188	6,437	20.0	10	12 770
47 000 29920	Goodlettsville city, TN	13,325	11,219	2,106	18.8	35	13 2057
47 000 16920	Cookeville city, TN	25,471	21,744	3,727	17.1	17	14 1170
47 000 70500	Springfield city, TN	12,952	11,227	1,725	15.4	37	15 2115
47 000 67760	Shelbyville city, TN	16,149	14,042	2,107	15.0	31	16 1760
47 000 28540	Gallatin city, TN	21,608	18,794	2,814	15.0	24	17 1355
47 000 20620	Dickson city, TN	11,996	10,487	1,509	14.4	39	18 2231
47 000 75320	Tullahoma city, TN	19,153	16,761	2,392	14.3	26	19 1514
47 000 41520	Lebanon city, TN	17,282	15,208	2,074	13.6	28	20 1662
47 000 38320	Johnson City city, TN	57,079	50,354	6,725	13.4	7	21 479

CERTIFICATE OF SERVICE

I, Donna Fleming, a secretary in the law firm of Gardner, Carton & Douglas, certify that I have this 30th day of May, 2000 caused to be sent by hand delivery, a copy of the foregoing "Comments" to the following:

Ms. Sharon P. McDonald*
Mass Media Bureau
Federal Communications Commission
445 12th Street, SW – Suite 3-A266
Washington, D.C. 20554


Donna Fleming