

ORIGINAL

DOCKET FILE COPY ORIGINAL

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Cheboygan and)
Rogers City, Michigan)

MM Docket No. 00-69

RM-

JUN 16 2000

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COUNTERPROPOSAL

D & B Broadcasting L.L.C., licensee of radio station WSRQ(FM) Bear Lake, Michigan, along with Fort Bend Broadcasting Company, proposed Assignee of WSRQ(FM) 1/ (hereinafter referred to jointly as "Counter-Petitioners") and 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 April 25, 2000 (DA 00-916).

In the NPR Escanaba License Corp ("Escanaba") proposed the allotment of Channel 260C2 to Cheboygan, Michigan, as a second FM service to that community and to accommodate that new allotment, also proposed a change in allotted channel in Rogers City, Michigan, from 260C2 to 292C2. Escanaba indicated it would file

No. of Copies rec'd
List ABCDE

0+4

1/ The parties have recently executed a contract for sale of the station and anticipate filing application form 314 requesting FCC approval of the sale within the next 15 days.

an application for new channel 260C2 in Cheboygan if that channel were so allotted.

Conversely, Counter-Petitioners in the instant counterproposal submit a plan that will in fact result in a preferable change in allotments from the original Escanaba proposal by maintaining the proposed equivalent channel change in Rogers City from 260C2 to 292C2 but also suggesting equivalent modifications in allotments that will result in a first aural service allotment to Bellaire, Michigan, an improved first local service in Bear Lake, and a new first local service for the town of Rapid River.

I. The Counter Proposal

Reference to the attached Engineering Exhibit in support of this counterproposal specifies and documents in full detail how each of the requested changes are accomplished and their compliance with the Commission's rules and policies that govern such changes. Specifically, as set forth therein, Counter-Petitioners propose to modify the existing license of WSRQ(FM) from channel 261A to channel 260C1 and change its community of license from Bear Lake to Bellaire, Michigan. Counter-Petitioners express their interest and commitment here that upon adoption of that change, Counter-Petitioners would file an application and construct the station as requested. The allocation in Bear Lake would then be replaced by equivalent channel 291A for which Counter-Petitioners hereby also state their interest and commitment to promptly file an application for construction and

operation on that channel if so allotted 2/Finally, Counter-Petitioner's propose to add new channel 259A to Rapid River, Michigan as its first local aural service, and Counter-Petitioner's also indicate their interest and commitment to promptly file an application for construction and operation of that channel if allotted.

A. The Proposed First Aural Service for Bellaire.

The city of Bellaire had a 1990 U.S. Census population of 1,104 persons and a Michigan mid-census adjusted population of 1,230. It is also the County Seat of Antrim County, Michigan, 1990 U.S. Census population of 18,185, located in Northwest lower Michigan. The County is bordered by Lake Michigan and several rivers and includes several lakes, all of which contribute to its popularity for skiing and other recreational activities.

The city of Bellaire was first established in 1879 and is a self-governing community with a Village Manager appointed by an elected Village Counsel which is presided over by the Village President. It is also presently in the process of incorporating. Bellaire has its own post office and local school system including Bellaire Elementary and Bellaire High School. The people of Bellaire are served by several Bellaire churches including Bellaire United Methodist Church, Hope Lutheran Of

2/ It is noted that the removal of existing channel 261A in Bear Lake and its replacement with 291A has already been proposed in a Petition for Rulemaking filed by Northern Radio of Michigan, Inc. on March 24, 2000, which proposal is totally consistent with the proposal here.

Bellaire, St. Luke's Catholic Church, Wesleyan Church, Living Word North and the Church in the Hills. Bellaire has a thriving local business community with dozens of businesses located in the downtown area.

It has its own airport, the Antrim County airport, located in Bellaire, and its own newspaper, the Antrim County news located in Bellaire. As County Seat, it also includes County Government offices including the County Court House, located in downtown Bellaire and recently listed as a historic landmark. Bellaire also includes several parks and swimming facilities within the Village Limits including Craven Park and Richardi Park, operated for the benefit of the people of Bellaire. A more detailed description of Bellaire, its businesses, organizations, government services etc. may also be found at <http://www.torchlake.com/bellaire> and at <http://www.multimag.com/city/mi/bellaire>.

B. Other Proposed Changes

In addition to the changes at Bear Lake and Bellaire, Counter-Petitioner's also propose to add new channel 259A as a first service allotment to Rapid River, Michigan. Rapid River is a town of 746 people (1990 U.S. Census) located in Delta County (1990 population 37,780). Since this first service can also be accomplished consistent with this Counterproposal and would result in an increased service throughout the Delta County area as well as a first service for Rapid River, it is submitted that

adoption of this allotment would be in the public interest. As previously noted, Counter-Petitioners have included their commitment to apply for and build this station if allotted.

In addition, in order to accommodate the allotment of 260C1 as a first service to Bellaire, the following minor changes in existing allotments would also be required:

1. Rogers City, Michigan: The NPR already proposes to change the allocation of 260C2 in Rogers City to 292C2, and Counter-Petitioners support that change. Channel 260C2 in Rogers City is presently occupied by radio station WHAK and Counter-Petitioners agree to reimburse the licensee of WHAK its reasonable costs in making the channel change as part of this proposal.

2. Manistique, Michigan: Channel 260A is presently assigned to Manistique but is not presently occupied. At this time one application is pending for use of that channel (BPH-970925MG). It is proposed that this unoccupied channel be deleted and replaced with equivalent channel 265A. As an unoccupied channel Counter-Petitioners do not believe that they would normally be obliged to reimburse the applicant for any expenses in re-designation of its requested frequency, but if the Commission determines otherwise, Counter-Petitioners would honor that determination.

3. Ludington, Michigan: Channel 292A in Ludington is presently occupied by radio station WKLA. Counter-Petitioners propose to change that allotment to equivalent channel 254A and

agree to reimburse the licensee of WKLA its reasonable costs in making the channel change.

4. Walhalla, Michigan: channel 255A allotted to Walhalla is presently vacant with no applications pending. Counter-Petitioners propose to change this vacant allotment to channel 293A.

It is noted that the instant proposal would have the benefit of not only providing a first service to Bellaire, but also at the same time replacing a short-spaced 3KW FM channel in Bear Lake with a fully spaced 6KW channel and that the Counter-Petitioners have committed to applying for and building a new station on that improved channel if allotted. Therefore, the net effect of the change would be beneficial to the people of Bear Lake, quickly providing an upgraded and more powerful first service station with a predictably larger service area, a substantial gain in service to replace the departing short-spaced allocation.

It is also noted that under the Commission's rules the proposed reallocation of channel 261A in Bear Lake to channel 260C1 in Bellaire would be an adjacent channel improvement by the licensee of WSRQ and as such would be a protected move, not subject to outside expressions of interest. Counter-Petitioners have committed to build and operate WSRQ on channel 260C1 in Bellaire as requested herein and it is therefore requested that any adoption of this Counterproposal include an Order directing

the licensee of WSRQ to proceed with such application and construction.

As also noted above, Counter-Petitioners have also agreed here to reimburse all reasonable and necessary out-of-pocket expenses to any party in this proceeding required to change their channel allocation consistent with this proposal.

II. Comparison of Proposals

In comparing the elements of the Cheboygan proposal by Escanaba to the conflicting proposal submitted here by Counter-Petitioners, the superiority of the Counter-Petitioners proposal is readily apparent and indisputable. At the present time Cheboygan is served by two existing local services, radio station WGFM(FM) operating on FM channel 286C1 and also fulltime service from radio station WCBY(AM) operating with 1KW fulltime on 1240 kilohertz. Escanaba proposes to add a third fulltime local service to Cheboygan.

Bellaire, a town of 1,104 (in 1990) and County Seat of Antrim County, population of 18,185 (in 1990) has nothing. Bellaire has no local radio service at all, of any kind. Adoption of this counterproposal would provide Bellaire with its first local aural service of any kind. The comparison is easy: a third local service for Cheboygan or a first local service for Bellaire.

In Revision of FM Assignment Policies and Procedures ("FM Priorities"), 90 FCC 2d 88 (1982), the Commission listed the order of public interest priorities in making allotments. The first was for a first full time reception service which does not apply here. The second and third priorities, "second full time reception service" and "first local service" are considered equally important. Since Cheboygan already has two local fulltime services, it clear that by those two stations alone, it already has a first and second reception service. If we were to assume that Bellaire also receives at least two reception services from outside the city, that leaves the priority of first local service as paramount to consider. Cheboygan already has two local services and Bellaire has none.

We suggest that the analyses is clear and conclusive in favor of Bellaire. It is therefore respectfully submitted that the instant proposal by the Counter-Petitioners to provide a first local service to Bellaire, Michigan is patently and conclusively superior to the conflicting proposal of Escanaba to add a third local service to Cheboygan and in view thereof, the Counter-Petitioner's proposal should be adopted.

III. Conclusion

In sum, we note that adoption of this counterproposal would result in a new first local service for the town of Bellaire as well as a vastly improved first local service for the town of Bear Lake, and a new first local service to Rapid River, resulting in the most efficient use of the available allocations

to provide the greatest amount of service. 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, it is respectfully submitted that the instant counterproposal is in the public interest and should be adopted and the Commission's Table of Allocations amended as follows:

City	Present	Proposed
Bellaire, Michigan	-	260C1
Rogers City, Michigan	260C2	292C2
Manistique, Michigan	260A	265A
Bear Lake, Michigan	261A	291A
Ludington, Michigan	292A	254A
Walhalla, Michigan	255A	293A
Rapid River, Michigan	-	259A

Wherefore, it is respectfully submitted that the instant Counterproposal is in the public interest and should be adopted.

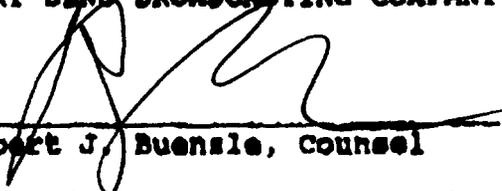
Respectfully Submitted,

D & B BROADCASTING L.L.C.

by 
Jarrod D. Miller, Counsel

Miller & Miller P.C.
1990 M Street, N.W., Suite 760
Washington, D.C. 20036
(202) 785-2720

FORT BEND BROADCASTING COMPANY

by 
Robert J. Buensie, Counsel

Law Offices, Robert J. Buensie
12110 Sunset Hills Road, Suite 450
Reston, Virginia 20190
(703) 715-3006

June 16, 2000

**Fort Bend Broadcasting Company
Post Office Box 948
Houston, TX 77001**

**Comments and Counterproposal
MM Docket 00-69
Cheboygan and Rogers City, Michigan**

June 2000

**(c) 2000
F. W. Hannel, PE
All Rights Reserved**

STATE OF ARIZONA)
) SS:
COUNTY OF MARICOPA)

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.



June 15, 2000

F. W. Hannel, P.E.

F. W. Hannel, PE
10733 East Butherus Drive
Scottsdale, AZ 85259
480) 585-7475
Fax (815) 327-9559
<http://fwhannel.com>

Fort Bend Broadcasting Company
Post Office Box 948
Houston, TX 77001

Comments and Counterproposal
MM Docket 00-69
Cheboygan and Rogers City, Michigan

June 2000

This firm has been retained by Fort Bend Broadcasting Company to prepare this engineering statement in support of its Comments and Counterproposal in the above captioned proceeding. The Commission's Notice of Proposed Rulemaking sought comments on a proposal to add FM Channel 260C2 at Cheboygan, Michigan as a second local FM Service¹. In order to accommodate the assignment of FM Channel 260C2 to Cheboygan it is required that FM Channel 260C2 at Rogers City, Michigan be changed to FM Channel 292C2 and that the license of Radio Station WHAK(FM) be modified to specify operation on FM Channel 292C2.

As a Counterproposal in this proceeding, Fort Bend Broadcasting is proposing that 1) that the license of Radio Station WSRQ(FM), Bear Lake, Michigan be modified to specify operation on FM Channel 260C1 and that it be assigned to Bellaire, Michigan as that community's first local aural service, 2) that the license of Radio Station WHAK(FM) be modified to specify operation on FM Channel 292C2 at its presently authorized site, 3) that the presently assigned FM Channel 260A at Manistique, Michigan be changed to FM Channel 265A² at the presently authorized site for FM Channel 260A³, 4) that FM Channel 291A be assigned to Bear Lake, Michigan to replace the presently assigned FM Channel 261A, 5) that the license of Radio Station

¹ While the proposal is for the addition of a second FM service, Cheboygan is presently served by 2 other aural services, Radio Station WGFM(FM), operating on FM Channel 286C1, and by Radio Station WCBY(AM), operating fulltime on 1240 kHz. Hence, the proposed addition of FM Channel 260C2 would, actually, be Cheboygan's third local aural service.

² While it is proposed that FM Channel 265A be substituted for FM Channel 260A at Manistique, Michigan, it should be noted that a number of other equivalent channels are available, (eg FM Channel 269A, 279A), and any of these alternate channels would be acceptable to Fort Bend Broadcasting as a replacement channel at Manistique.

WKLA(FM), Ludington, Michigan be modified to specify operation on FM Channel 254A and 6) that vacant FM Channel 255A at Walhalla, Michigan be deleted and FM Channel 293A be assigned to that community as a replacement channel. As is more fully documented below, the proposed changes in the FM Table of Allotments can be made in full compliance with the Commission's mileage separation and city grade illumination requirements and the changes proposed by Fort Bend Broadcasting Company result in a more equitable distribution of the FM services. No community is deprived of service and the community of Bellaire, Michigan receives its first local aural service.

DISCUSSION

The assignment of FM Channel 260C1 at Bellaire, Michigan can be made at reference co-ordinates N45-20-48, W85-07-46. This allotment site is 25 km north of the community of Bellaire, Michigan and a transmitter operating from this allotment site will fully comply with the Commission's city grade illumination and minimum mileage separation requirements. Attached as Exhibit E-2 is an FM Channel Study conducted from the allotment co-ordinates which clearly demonstrates that the assignment can be made to the community if the other changes proposed in this Counterproposal are adopted.

The Community of Bellaire, Michigan has a population of 1104 persons⁴ and is located in Antrim County which has a population of 18,185 persons. The assignment of FM Channel 260C1 would be that community's first local aural service. Bellaire is clearly a community for FM Allotment purposes and is fully qualified to receive a first local aural service.

In order to allot FM Channel 260C1 at Bellaire, Michigan several related changes in the FM Table of Allotments must be made and each is discussed more fully below.

³ The site used for this study is the site chosen by the winning bidder for FM Channel 260A at Manistique,

1. **Rogers City.** The Commission has proposed that the presently assigned FM Channel 260C2 at Rogers City be changed to FM Channel 292C2. Fort Bend Broadcasting Company supports this change in channel at Rogers City.

2. **Manistique, Michigan.** Presently FM Channel 260A is assigned to Manistique and one application is pending, File Number BPH970925MG, at geographic co-ordinates N45-58-05, W86-16-24. It is proposed that this channel be deleted and that FM Channel 265A be assigned to Manistique with the reference co-ordinates as specified in the above application. Attached as Exhibit E-3 is an FM Channel Study which demonstrates that the proposed FM Channel 265A complies fully with the Commission's minimum mileage separation requirements.

3. **Bear Lake, Michigan.** It is proposed that the presently assigned FM Channel 261A, a grand fathered short spaced 3 kilowatt Class A channel, be deleted and that the license for Radio Station WSRQ(FM) be amended to specify operation on FM Channel 260C1 at Bellaire, Michigan. As a replacement channel for the community of Bear Lake, Fort Bend Broadcasting proposes the allotment of a fully spaced Class A allotment, FM Channel 291A at reference co-ordinates N44-19-41, W86-16-14. This transmitter reference site is located 14.2 kilometers southwest of Bear Lake, and a transmitter operating at these co-ordinates will fully illuminate Bear Lake with the required city grade signal. Attached as Exhibit E-4 is an FM Channel Study which shows that the allotment of FM Channel 291A can be made to Bear Lake if the presently assigned FM Channel 292A occupied by Radio Station WKLA(FM) were relocated.

4. **Ludington, Michigan.** It is proposed that Radio Station WKLA(FM) be relocated to FM Channel 254A at the present transmitter site of that station. Attached as Exhibit E-5 is an FM Channel Study which shows that FM Channel 254A at Ludington fully complies with the Commission's minimum

File Number BPH970922ME No Construction Permit has been issued to the highest bidder at this time.

mileage separation requirements at the present WKLA(FM) transmitter site if vacant FM Channel 255A at Walhalla were relocated.

5. **Walhalla, Michigan.** It is proposed that the vacant FM Channel 255A at Walhalla be relocated to FM Channel 293A at allotment site reference co-ordinates N44-00-19, W86-08-54. This allotment site is 6.4 kilometers northwest of Walhalla, (US Atlas Co-ordinates N43-57-12, W86-06-53), and a transmitter operating from this site will fully illuminate the city with the required city grade signal. Attached as Exhibit E-6 is an FM Channel study at the allotment reference site which demonstrates that the proposed allotment of FM Channel 293A fully complies with the Commission's minimum mileage separation requirements.

6. **Rapid River, Michigan.** It is proposed that FM Channel 259A be assigned to Rapid River, Michigan as that community's first local service. This channel is presently precluded from assignment at this community by the assignment of FM Channel 260A at Manistique, Michigan which is proposed to be moved to FM Channel 265A. Rapid River has a population of 746 persons and is located in Delta County which has a population of 37,780 persons⁵. See Exhibit E-8. The assignment of FM Channel 259A to Rapid River can be made at reference co-ordinates N46-01-42, W86-52-00, 13.5 km northeast of the city, (US Atlas co-ordinates N45-55-37, W86-58-00), and a transmitter operating from this allotment site will fully illuminate the community with the required city grade signal and fully comply with the Commission's minimum mileage separation requirements.

Other Considerations: As a final matter, the spacing between the newly requested assignments fully comply with the Commission's mileage separation requirements. Specifically, the proposed allotment of FM Channel 292C2 at Rogers City Michigan is spaced 134 km from FM Channel 291A at Bear lake, 28 km in excess of the required spacing of 106 km. Additionally, the Rogers City allotment on FM

⁴ Bureau of Census 1990, See Exhibit E-1.

Channel 292C2 is 234 km from the proposed allotment of FM Channel 293A at Walhalla, Michigan, 128 km in excess of the required spacing of 106 km. Additionally, the assignment of FM Channel 291A at Bear Lake is spaced 37 km from the proposed allotment of FM Channel 293A at Walhalla, 6 km in excess of the required spacing of 31 km. In sum, all of the requested allotments comply fully with the Commission's minimum mileage separation requirements.

⁵ See Exhibit E-8

In view of the foregoing, it is requested that the Commission institute a rulemaking proceeding looking toward amending the FM Table of Allotments as follows:

Community	Present	Proposed
Bellaire, Michigan	-----	260C1
Rogers City, Michigan	260C2	292C2
Manistique, Michigan	260A	265A
Bear Lake, Michigan	261A	291A
Ludington, Michigan	292A	254A
Walhalla, Michigan	255A	293A
Rapid River, Michigan	-----	259A

As is shown above, the above proposed changes in the FM Table of Allotments results in a preferential arrangement of the FM Table of Allotments since the proposal provides a first local aural service to a total of 2 communities of substantial size while not depriving any community of a local aural service. This proposal is clearly superior to a proposal to add a third aural service to an already well served community and should be adopted by the Commission.

Fort Bend Broadcasting Company
Post Office Box 948
Houston, TX 77001

Comments and Counterproposal
MM Docket 00-69
Cheboygan and Rogers City, Michigan

June 2000

Exhibit E-1

1990 US Census Data
Database: C90STF1A
Summary Level: **state--Place**

Bellaire village: FIPS.STATE=26, FIPS.PLACE90=06980

PERSONS

Universe: *Persons*

Total.....1104

1990 US Census Data
Database: C90STF1A
Summary Level: **state--County**

Antrim County: FIPS.STATE=26, FIPS.COUNTY90=009

PERSONS

Universe: *Persons*

Total.....18185

Fort Bend Broadcasting Company
Post Office Box 948
Houston, TX 77001

Comments and Counterproposal
MM Docket 00-69
Cheboygan and Rogers City, Michigan

June 2000

Exhibit E-2

FM CHANNEL STUDY
FM Channel 260C1
N45-20-48 W85-07-46

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
WTLI	Bear Creek Township	MI	207	C2	L	35.6	27.0	123.5°	8.6
WTLI	Bear Creek Township	MI	207	C1	A	35.6	34.0	123.5°	1.6
ALC	Frankfort	MI	257	C2	U	115.4	79.0	224.8°	36.4
WBNZ	Frankfort	MI	257	C2	L	115.4	79.0	224.8°	36.4
ALC	Midland	MI	259	C	U	208.7	209.0	167.2°	-0.3
NEW-T	Petoskey	MI	259	D	A	19.0	0.0	24.5°	19.0
WUGN	Midland	MI	259	C	L	208.7	209.0	167.2°	-0.3
ALC	Sturgeon Bay	WI	259	C2	U	183.0	158.0	254.5°	25.0
ALC	Carney	MI	260	A	A	199.8	200.0	277.8°	-0.2
ALC	Manistique	MI	260	A	V	110.4	200.0	307.9°	-89.6
ALC	Manistique	MI	260	A	D	110.4	200.0	307.9°	-89.6
ALC	Rogers City	MI	260	C2	U	103.0	224.0	85.4°	-121.0
NEW	Manistique	MI	260	A	A	112.7	200.0	307.5°	-87.3
NEW	Manistique	MI	260	A	A	107.6	200.0	310.0°	-92.4
NEW	Manistique	MI	260	A	A	112.8	200.0	307.8°	-87.2
WHAKFM	Rogers City	MI	260	C2	D	94.8	224.0	86.5°	-129.2
WHAKFM	Rogers City	MI	260	C2	L	94.8	224.0	86.5°	-129.2
ALC	Bear Lake	MI	261	A	U	129.3	133.0	217.3°	-3.7
WSRQ	Bear Lake	MI	261	A	L	129.3	133.0	217.3°	-3.7
ALC	Grayling	MI	262	C1	U	90.7	82.0	140.1°	8.7
WGRYFM	Grayling	MI	262	C1	L	92.9	82.0	158.2°	10.9
CHASFM	Sault Ste Marie	ON	263	C		143.5	111.0	25.8°	32.5

All distances in kilometers

Fort Bend Broadcasting Company
 Post Office Box 948
 Houston, TX 77001

Comments and Counterproposal
 MM Docket 00-69
 Cheboygan and Rogers City, Michigan

June 2000

Exhibit E-3

FM CHANNEL STUDY
 FM Channel 265A
 N45-58-05 W86-16-24

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
ALC	Crystal Falls	MI	264	C1	U	141.5	133.0	263.9°	8.5
WOBE	Crystal Falls	MI	264	C1	C	141.5	133.0	263.9°	8.5
ALC	East Jordan	MI	265	A	U	127.2	115.0	135.0°	12.2
WIZY	East Jordan	MI	265	A	L	126.9	115.0	133.8°	11.9

All distances in kilometers

Fort Bend Broadcasting Company
 Post Office Box 948
 Houston, TX 77001

Comments and Counterproposal
 MM Docket 00-69
 Cheboygan and Rogers City, Michigan

June 2000

Exhibit E-4

FM CHANNEL STUDY
 FM Channel 291A
 N44-19-41 W86-16-14

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
AJC	Charlevoix	MI	290	C1	U	132.7	133.0	44.6°	-0.3
WKHQFM	Charlevoix	MI	290	C1	L	132.7	133.0	44.5°	-0.3
AJC	Waukesha	WI	291	B	U	190.5	178.0	223.7°	12.5
WMILFM	Waukesha	WI	291	B	L	190.6	178.0	223.7°	12.6
AJC	Ludington	MI	292	A	U	48.5	72.0	194.8°	-23.5
WKLAFM	Ludington	MI	292	A	D	32.2	72.0	201.2°	-39.8
WKLAFM	Ludington	MI	292	A	L	32.2	72.0	201.2°	-39.8

All distances in kilometers

Fort Bend Broadcasting Company
 Post Office Box 948
 Houston, TX 77001

Comments and Counterproposal
 MM Docket 00-69
 Cheboygan and Rogers City, Michigan

June 2000

Exhibit E-5

FM CHANNEL STUDY
 FM Channel 254A
 N44-03-27 W86-24-58

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
WGFM	Glen Arbor	MI	251	C2	L	91.2	55.0	21.5°	36.2
ALC	Houghton Lake	MI	253	C1	U	136.3	133.0	79.2°	3.3
WUPS	Houghton Lake	MI	253	C1	L	136.3	133.0	79.2°	3.3
ALC	Green Bay	WI	253	C1	U	151.9	133.0	295.4°	18.9
WQLH	Green Bay	WI	253	C1	L	151.9	133.0	295.4°	18.9
ALC	Grand Rapids	MI	254	A	U	128.6	115.0	152.9°	13.6
WFGR	Grand Rapids	MI	254	A	L	127.9	115.0	152.9°	12.9
ALC	Walhalla	MI	255	A	V	26.2	72.0	131.2°	-45.8
ALC	Two Rivers	WI	255	A	V	99.8	72.0	269.5°	27.8
NEW	Two Rivers	WI	255	A	A	100.7	72.0	268.9°	28.7
NEW	Two Rivers	WI	255	A	A	100.7	72.0	268.9°	28.7
NEW	Two Rivers	WI	255	A	A	100.7	72.0	268.9°	28.7
NEW	Two Rivers	WI	255	A	A	100.7	72.0	268.9°	28.7
NEW	Two Rivers	WI	255	A	A	99.9	72.0	270.3°	27.9
ALC	Frankfort	MI	257	C2	U	64.7	55.0	18.3°	9.7
WBNZ	Frankfort	MI	257	C2	L	64.7	55.0	18.3°	9.7

All distances in kilometers

Fort Bend Broadcasting Company
Post Office Box 948
Houston, TX 77001

Comments and Counterproposal
MM Docket 00-69
Cheboygan and Rogers City, Michigan

June 2000

Exhibit E-6

FM CHANNEL STUDY
FM Channel 293A
N44-00-19 W86-08-54

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
AJC	Lakeview	MI	292	A	U	94.1	72.0	131.7°	22.1
AJC	Ludington	MI	292	A	U	24.8	72.0	243.5°	-47.2
WKLAFM	Ludington	MI	292	A	D	22.2	72.0	285.1°	-49.8
WKLAFM	Ludington	MI	292	A	L	22.2	72.0	285.1°	-49.8
WPLBFM	Lakeview	MI	292	A	L	97.3	72.0	132.9°	25.3
AJC	Kalamazoo	MI	293	B	U	178.2	178.0	162.5°	0.2
WQLR	Kalamazoo	MI	293	B	L	178.2	178.0	162.5°	0.2
AJC	Sheboygan Falls	WI	293	A	U	130.0	115.0	255.5°	15.0
WWJR	Sheboygan Falls	WI	293	A	L	131.3	115.0	256.1°	16.3
AJC	Gaylord	MI	294	C1	U	155.2	133.0	41.9°	22.2
WKPK	Gaylord	MI	294	C1	L	155.2	133.0	41.9°	22.2
AJC	Muskegon	MI	295	B	U	86.3	69.0	176.6°	17.3
WMUSFM	Muskegon	MI	295	B	L	86.3	69.0	176.6°	17.3
WMUSFM	Muskegon	MI	295	B	L	86.3	69.0	176.6°	17.3
AJC	Cadillac	MI	296	A	U	67.5	31.0	74.1°	36.5
WCKC	Cadillac	MI	296	A	L	67.5	31.0	74.2°	36.5

All distances in kilometers

Fort Bend Broadcasting Company
 Post Office Box 948
 Houston, TX 77001

Comments and Counterproposal
 MM Docket 00-69
 Cheboygan and Rogers City, Michigan

June 2000

Exhibit E-7

FM CHANNEL STUDY
 FM Channel 259A
 N46-01-42 W86-52-00

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLR
ALC	Negaunee	MI	258	A	U	77.9	72.0	312.9°	5.9
WNGE	Negaunee	MI	258	A	C	71.9	72.0	318.7°	-0.0
WLTM	Sturgeon Bay	WI	259	C2	L	165.9	166.0	201.1°	-0.1
ALC	Carney	MI	260	A	A	78.5	72.0	231.8°	6.5
ALC	Manistique	MI	260	A	V	48.7	72.0	99.4°	-23.3
ALC	Manistique	MI	260	A	D	48.7	72.0	99.4°	-23.3
NEW	Manistique	MI	260	A	A	46.2	72.0	98.9°	-25.8
NEW	Manistique	MI	260	A	A	53.1	72.0	97.1°	-18.9
NEW	Manistique	MI	260	A	A	46.5	72.0	98.3°	-25.5
ALC	Gwinn	MI	262	C3	A	47.4	42.0	307.6°	5.4

All distances in kilometers

Fort Bend Broadcasting Company
Post Office Box 948
Houston, TX 77001

Comments and Counterproposal
MM Docket 00-69
Cheboygan and Rogers City, Michigan

June 2000

Exhibit E-8

1990 US Census Data
Database: C90STF1A
Summary Level: **state--County--County** Subdivision

Rapid River Township county: FIPS.STATE=26, FIPS.COUNTY90=079,
FIPS.COUSUB90=67180
PERSONS
Universe: Persons
Total..... 746

1990 US Census Data
Database: C90STF1A
Summary Level: **state--County**

Delta County: FIPS.STATE=26, FIPS.COUNTY90=041
PERSONS
Universe: Persons
Total..... 37780

CERTIFICATE OF SERVICE

I, Robert J. Buenzle, do hereby certify that copies of the foregoing Counterproposal have been served by United States mail, postage prepaid this 16th day of June, 2000, upon the following:

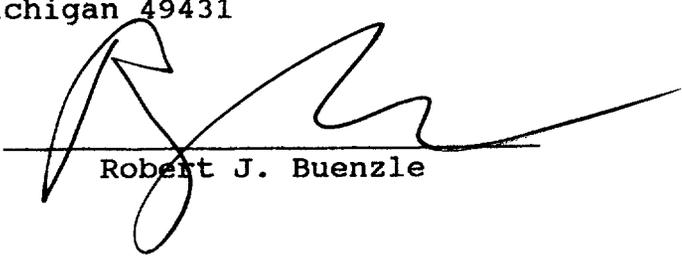
John A. Karousos, Esq.
Federal Communications Commission
Mass Media Bureau
Portals II, Room 3-A266
445 12th Street SW
Third Floor
Washington, D.C. 20024

Lyle Robert Evans, President
Escanaba License Corp.
1101 Ludington Street
Escanaba, Michigan 49829

Ives Broadcasting, Inc
Radio Station WHAK
1491 M-32 West
Alpena, Michigan 49707

Todd Stuart Noordyk
101 Huron Court
Negaunee, Michigan 49886

Lake Michigan Broadcasting, Inc.
Radio Station WKLA
215 Harbor Drive
Ludington. Michigan 49431



Robert J. Buenzle