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August 9, 2000

RECEIVED

AUG 9 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**BY HAND**

Mr. John A. Karousos  
Mass Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room 3-A266  
Washington, DC 20554

In Re: MM Docket No. 00-102

Dear Mr. Karousos:

Enclosed is the original of a Technical Exhibit, a copy of which was filed yesterday in the above proceeding with the Reply Comments of Arso Radio Corporation.

Very truly yours,

*John P. Bankson, Jr.*  
John P. Bankson, Jr.

JPB/jb

Enclosure

No. of Copies rec'd 0  
List A B C D E

# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

**REPLY COMMENTS**  
**MM DOCKET #00-102**  
**ARSO RADIO CORPORATION**  
**WPRM-FM RADIO STATION**  
**SAN JUAN, PUERTO RICO**  
**August 2000**

**TECHNICAL EXHIBIT**

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**REPLY COMMENTS**  
**MM DOCKET #00-102**  
**ARSO RADIO CORPORATION**  
**WPRM-FM RADIO STATION**  
**SAN JUAN, PUERTO RICO**  
**August 2000**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Arso Radio Corporation ("Arso"), licensee of WPRM-FM, San Juan, Puerto Rico. Arso submits these comments in reply to submissions made during the comment period of MM Docket #00-102. The Petitioners in the instant Docket are requesting the allotment of Channel 257A to Charlotte Amalie, Virgin Islands; the allotment of Channel 258A to Frederiksted, Virgin Islands; and finally, that WVIQ, Channel 258B Christiansted, Virgin Islands, be ordered to change to Channel 293B.

2. During the comment period, Aurio & Juan Carlos Matos ("Matos"), submitted a counterproposal seeking the upgrade of their facility, WXZX, Channel 254A, Culebra, Puerto Rico, to Channel 254B1. To accommodate their request, Matos further requests Channel 258B1 be allotted to Charlotte Amalie (in lieu of Channel 257A), the allotment of Channel 248A at Frederiksted (in lieu of Channel 258A) and the substitution of Channel 253B for Channel 254B at Mayaguez, Puerto Rico. The proposed use of Channel 258B1 at Charlotte Amalie requires WVIQ, Channel 258B, to be relocated to Channel 293B. There is no change of site necessary for WVIQ to implement the channel change.

3. Arso herein states its supports for the proposed Matos counterproposal, as outlined above. The Matos counterproposal is partially based on previous work the undersigned had prepared on behalf of Matos. However, in the intervening time, the use of Channel 248A at Frederiksted has the potential for impacting a new FM facility on Channel 247C at the British Virgin Islands. Therefore, a study has been made and an alternate channel identified that does not impact any international facilities. As shown on Exhibit #1, Channel 300A can be allotted to Frederiksted and meet the Commission's minimum distance separation requirements at geographic coordinates North Latitude 17° 44' 51" and West Longitude 64° 50' 11" (the same coordinates proposed by the petitioners in MM Docket #00-102).

4. The foregoing statement was prepared on behalf of Arso Radio Corporation by Graham Brock, Inc. its Technical Consultants. All data related to FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in the database that may be adverse to the requests contained herein.

**REPLY COMMENTS**  
**MM DOCKET #00-102**  
**ARSO RADIO CORPORATION**  
**WPRM-FM RADIO STATION**  
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**August 2000**

**EXHIBIT #1**

ALLOCATION STUDY FOR FREDERIKSTED, VIRGIN ISLANDS  
 USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE		DISPLAY DATES
17 44 51 N	CLASS A	DATA 08-04-00
64 50 11 W	Current rules spacings	SEARCH 08-08-00
----- CHANNEL 300 -107.9 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD300 AD	300A 17 44 51 64 50 11	Frederiksted	VI 0.000 kW	0.0 0M	0.0 0.0	115.0 70.2	-115.00
> alternate channel							
WVOZFM LIC CN	299B 18 18 36 65 47 41	Carolina	PR 12.000 kW	301.8 841M	119.05 74.0	113.0 70.2	6.05
International B/cng Corp. BLH-19990205KA							
WVGN.C CP CN	297A 18 21 31 64 58 20	Charlotte Amalie	VI 1.400 kW	348.1 477M	69.15 43.0	31.0 19.3	38.15
D/b/a Calypso Communications BMPH-19970714ID							
WVGN.C CP CN	297A 18 21 31 64 58 20	Charlotte Amalie	VI 1.400 kW	348.1 477M	69.15 43.0	31.0 19.3	38.15
D/b/a Calypso Communications BMPH-19970714ID							
NEW OPE CN	247C 18 25 00 64 39 00	British Virgin Isl	VI 100.000 kW	14.8 488M	69.19 43.0	29.0 18.0	40.19
Carib Broadcasting							
NEW OPE CN	247C 18 25 00 64 39 00	British Virgin Isl	VI 100.000 kW	14.8 488M	69.19 43.0	29.0 18.0	40.19
Carib Broadcasting							
NEW OPE CN	247C 18 25 00 64 39 00	British Virgin Isl	VI 100.000 kW	14.8 488M	69.19 43.0	29.0 18.0	40.19
Carib Broadcasting							

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

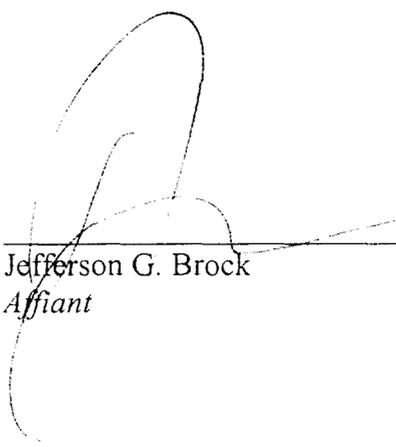
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Arso Radio Corporation, licensee of Radio Station WPRM-FM, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

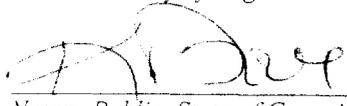
*This the 8th day of August, 2000.*



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Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 8th day of August, 2000.*



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*Notary Public, State of Georgia  
My Commission Expires: April 29, 2002*