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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

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| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| Amendment of Section 73.202(b), | ) | MM Docket No. 95-88 |
| Table of Allotments, | ) | RM-8641 |
| FM Broadcast Stations | ) | RM-8688 |
| (Rose Hill, Trenton, Aurora, and | ) | RM-8689 |
| Ocracoke, North Carolina) | | |

To: The Commission

**REPLY TO OPPOSITION TO APPLICATION FOR REVIEW**

Conner Media Corporation ("CMC"), by its attorneys and pursuant to Section 1.115(d) of the Commission's rules, hereby replies to the September 5, 2000 "Opposition to Application for Review" ("Opposition") submitted by Woolstone Corporation ("Woolstone") in the above-referenced proceeding. In support hereof, the following is respectfully shown:

By way of background, CMC has filed an "Application For Review" ("AFR") seeking Commission review of the Bureau's action allotting Channel 283A to Aurora, NC, over CMC's proposal to allot Channel 284C2 at Trenton, NC (as a Section 1.420(i) substitute for Channel 284A at Rose Hill, NC) and to modify of the license for CMC's existing FM station, WBSY, accordingly. The allotment of Channel 283A at Aurora was proposed in a counterproposal. In response, CMC identified an alternate allotment for Aurora, on Channel 221A ("Aurora Alternate Allotment"), which would have enabled grant of first local service allotments to both Trenton and Aurora. It is the Commission's well-established policy to attempt to identify alternate channels in order to accommodate conflicting proposals in FM rule making proceedings.[1] However, in the instant case, the Bureau rejected CMC's Aurora Alternate Allotment.

[1] See e.g. Willcox, AZ and Lordsburg, MN, 11 FCC Rcd 22257 (Chief, Alloc. Br.), and Rapid City and Lead, SD, 10 FCC Rcd 7715 (Chief, Alloc. Br. 1995).

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List A B C D E

Woolstone now holds a permit for the unbuilt Aurora facility on Channel 283A, which permit is expressly conditioned on the outcome of this proceeding. Woolstone claims that "[t]here is virtually no likelihood that it would be possible to find a suitable, fully-spaced site from which to operate a station on Channel 221A at Aurora," characterizing the "area to locate" on Channel 221A as "largely covered by marsh, swamp, and rivers,"[2] and/or on land owned by Weyerhaeuser Company ("Weyerhaeuser").[3] Woolstone represents that Weyerhaeuser is unwilling to make land available for a radio transmitter site[4], based on a previously submitted statement it obtained in 1997 from Howard Spence, a local Weyerhaeuser representative.[5]

Circumstances have changed since 1997. Exhibit A hereto is a September 14, 2000 statement by the same Howard Spence, in which Mr. Spence now confirms Weyerhaeuser's willingness to locate a proposed radio tower on the Weyerhaeuser property. Exhibit B hereto is a June 20, 2000 letter to a principal of CMC from Ms. Maro Imirzian, of Weyerhaeuser's corporate headquarters, offering a specific plot of Weyerhaeuser property for construction of a broadcast tower. At Exhibit C hereto, Tim L. Warner, P.E., CMC's technical consultant, demonstrates that the Channel 221A facility could be established at the Weyerhaeuser site in compliance with the Commission's spacing and coverage rules. (Mr. Warner further notes that the site is not a marsh or swamp, but rather, a parcel at the intersection of an all-weather paved highway, and suitable for tower construction.) Thus, there is indeed a site at which the Channel 221A facility could be constructed.

CMC recognizes that ordinarily the Commission will not review factual questions on which the delegated authority has had no opportunity to pass. CMC respectfully requests a waiver of Rule Section 1.115(c), if required, in order to update the record in this proceeding on the issue of site availability for the Aurora Alternate Allotment. Alternatively, CMC respectfully

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[2] Opposition at page 8.
[3] Opposition at page 9.
[4] Opposition at page 9.
[5] Opposition at Exhibit 2.

requests the Commission to refer this matter back to the Bureau for consideration of CMC's rebuttal evidence of changed circumstances.

In order to clear the way for the Aurora Alternate Allotment, CMC has asked that the vacant and unapplied for allotment on Channel 224C1 at Ocracoke, NC ("Ocracoke Allotment") be deleted or downgraded in this proceeding, noting that the allotment cannot place the required 70 dBu signal over Ocracoke[6] and is therefore substandard and defective. Woolstone claims that the Bureau previously found that the Ocracoke Allotment is "not substandard,"[7] but the record reflects that Bureau staff granted the one-step application underlying the Ocracoke Allotment ("Ocracoke Application") without comment. There is no basis to know whether the grant was reasoned or a mere oversight.

The requirement to place a 70 dBu signal over the entire community of license is a core allotment policy objective, even when the allotment is proposed, as was the Ocracoke Allotment, in a one-step application rather than a rule-making proceeding.[8] CMC placed technical evidence in the record to show that the Ocracoke Allotment cannot place a 70 dBu signal over Ocracoke.[9] CMC's coverage analysis assumed the license community to be Ocracoke Village[10], and not the entire Ocracoke Island as Woolstone claims[11]. More significantly, Woolstone is incorrect that an amendment to the Ocracoke Application[12] resolved

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[6] Rule Section 73.315.
[7] Opposition at page 5.
[8] Report and Order, "Amendment of the Commission's Rules to Permit FM Channel and Class Modifications by Application," 8 FCC Rcd 4735 at para. 13 (1993).
[9] See e.g. "Opposition To Motion To Accept Responsive Pleading," dated October 5, 1995, at Exhibit A. (Copy of Exhibit A attached hereto as Exhibit D.)
[10] Id. at Figure 1 (depicting the assumed boundaries of the license community) and Figure 2 (depicting the easternmost boundary of the license community).
[11] Opposition at page 5.
[12] The March 12, 1996 amendment to the Ocracoke Application was late-filed in response to the Bureau's October 18, 1995 "30-day" deficiency letter. Among other things, the amendment purported to make a miniscule change in the allotment coordinates, from 34-51-32, 76-25-00, to 34-51-32.3, 76-25-00.

the coverage shortfall.[13] The record reflects that the Ocracoke Applicant inappropriately assumed a height above average terrain of 300 meters as the basis of its calculation, rather than 299 meters, which is set forth in Rule Section 73.211(b) as the maximum height for a Class 1 facility at maximum power, thus exaggerating the predicted coverage.[14]

Woolstone's challenge to the Commission's authority to delete or downgrade the Ocracoke allotment in the context of the instant proceeding[15] is without merit. Woolstone would distinguish the cases cited in CMC's AFR[16] on the ground that in those cases no rule-compliant transmitter site could be found. However, CMC cited those cases as proof of the Commission's general authority to delete improvidently granted allotments on its own motion. In any event, the cited Jacksonville, Pine Knoll Shores, and Harkers Island, NC decision did expressly note that the deleted allotment could not provide 70 dBu coverage over the proposed license community, which is exactly the defect in the instant case.[17] Woolstone's suggestion to open a separate rule making proceeding to consider deletion or downgrade[18] would be a waste of Commission resources, as objective calculations show the Class C2 allotment to be deficient.

As a final matter, CMC wishes to respond to Woolstone's reckless charges that CMC's filing of the AFR constitutes an "abuse of process"[19] and a "delay tactic."[20] CMC properly filed the AFR in exercise of its express due process right under Section 1.115 of the Rules. CMC seeks Commission review of a staff action based on a Bureau policy that CMC seeks overturned.

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[13] Opposition at page 5.
[14] See Amendment to File No. BMPH-950728IC, dated March 12, 1996, at Exhibit E-1B (copy of Exhibit E-1B is attached hereto as Exhibit E). See also "Petition For Reconsideration," dated January 17, 1997, at Exhibit 1.
[15] Opposition at page 6.
[16] Pinckneyville, IL, 41 RR 2d 69 (B/cast Bur. 1977) and Jacksonville, Pine Knoll Shores, and Harkers Island, NC, 10 FCC Rcd 13159 (Policy & Rules Div. 1995).
[17] The Bureau stated, "The reference coordinates set forth in the Report and Order appeared to enable a Class A allotment to provide a 70 dBu signal over all of Pine Knoll Shores. However, it now appears that this determination was based on inaccurate city boundaries."
[18] Opposition at page 7.
[19] Opposition at pages 6 and 10.
[20] Opposition at page 10.

CMC's lack of success at the staff level does not render its request for review abusive. Nor is there any basis to allege delaying tactics. Favorable action by the Commission will enable CMC to improve the broadcast service presently provided by its licensed station WBSY. CMC seeks expeditious action, not delay. Woolstone's scurrilous allegations should therefore be rejected out-of-hand.

WHEREFORE, the premises considered, CMC respectfully requests that its Application For Review in this proceeding be GRANTED.

Respectfully submitted,

**CONNER MEDIA CORPORATION**

By Ellen Mandell Edmundson
Peter Gutmann
Ellen Mandell Edmundson
Its Attorney

Pepper & Corazzini, L.L.P.
1776 K Street, NW, 200
Washington, DC 20006
(202) 296-0600

September 15, 2000

# EXHIBIT A

Weyerhaeuser

Date: September 14, 2000

From: Howard Spence

Location:NC Timberlands - New Bern

Subject: Land For Radio Tower

Zoph,

This letter is to confirm our earlier telephone conversations involving Weyerhaeuser lands located on NC Highway 33 east of Aurora for a possible radio tower location. I have discussed this with our operational folks and they are in agreement with a possible tower site location on the south side of NC 33 highway and bounded on the east by our Romico road.

We are interested in working with you on this project but will have to involve Maro Imirzian in working out the details on the agreement and the cost associated with this site. Please be aware that final approval of this transaction is subject to our management approval.

I look forward to talking with you further.

Sincerely,

Howard Spence

Howard Spence

0

# EXHIBIT B

Weyerhaeuser
*The future is growing*™

Corporate Headquarters
PO Box 2999
Tacoma WA 98477-2999
Tel (253) 924 2345

June 20, 2000

Dr. Ronald Benfield
Conner Media Inc.
702 Hartness Road
Statesville, NC 28677

Dear Dr. Benfield:

Thank you for your interest in property owned by Weyerhaeuser located on NC Highway 33 East of Aurora, NC. You have indicated a need for 3+/-acres for the construction of a FM radio broadcasting tower.

Please know we are interested in working with you on this project. We have discussed possible cost, terms and have explored various methods of ownership with your agents. While we have not settled on the preferred method to proceed, we are committed to working toward a mutually beneficial solution concerning the tower site.

The plot of land in question has NC Highway 33 as its northern boundary and Weyerhaeuser service road known as Romico road as its eastern boundary. The land is located several hundred yards west of the Smith Creek Bridge.

We look forward to continuing discussions with you and your associates. Please let me know if you need additional information at this time.

Sincerely,

Maro Imirzian

Maro Imirzian

100th Anniversary

# EXHIBIT C

# Conner Media Corporation

# Aurora, North Carolina

# Engineering Statement for a Response to an Opposition to Application for Review

# Aurora, North Carolina

# MM Docket No. 95-88

Timothy L. Warner, Inc.
87 North Liberty Street
Asheville, North Carolina 28801
(828) 258-1238

Conner Media Corporation
Aurora, North Carolina

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Conner Media Corporation
Aurora, North Carolina

## Declaration

I declare, under penalty of perjury, that I am a technical consultant to broadcasting and other communications systems, that I have over thirty years of experience in the engineering of broadcast and other communications systems, that I am familiar with the Federal Communications Commission's Rules found in the Code of Federal Regulations Title 47, that I am a Professional Engineer registered in North Carolina, that I have prepared or supervised the preparation of the attached Engineering Statement for Conner Media Corporation, and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief.

Timothy L. Warner, P.E.
87 North Liberty Street
Asheville, North Carolina 28801
(828) 258-1238
13 September 2000

Conner Media Corporation
Aurora, North Carolina

Narrative

## Background

Conner Media Corporation has proposed the allocation of Channel 221A to Aurora, North Carolina.

## Site

Conner Media Corporation has secured a commitment for a site which complies with the spacings considered in this Statement and provides 3.16 mV/m (70 dBu) coverage encompassing the entire Aurora community boundary. As shown elsewhere in this filing, the owner of the land, Weyerhaeuser, has committed in writing to providing 3 acres, more or less, for construction of a tower. Figure 1 shows the approximate site of a tower at the center of a 3 acre square parcel at the intersection identified in the Weyerhaeuser letter. The site is adjacent to North Carolina State Route 33, an all weather paved highway. The Weyerhaeuser service road is used to tend extensive forestry holdings South of SR 33. Weyerhaeuser is a forest products company. The road is used by heavy trucks and logging machinery. The proposed site is suitable for tower construction.

The entire Aurora area is low lying coastal plain. The swamp identification on the map is based on photographic data and is not field verified. The area South of SR 33, for instance, is shown as swamp ending in a straight line at the road, while the North side of the road, at lower elevation, is not shown as swamp. The swamp designation on the map is too general to provide information on the bearing capacity of the soil. All coastal sites require attention to soils for tower construction.

## Principal Community Contour

Figure 2 shows the predicted 3.16 mV/m or 70 dBu F(50,50) principal community contour for the proposed site as well as the 1 mV/m or 60 dBu contour. Height above average terrain is based on elevation data extracted from a 3 arcsecond digital elevation model from the

Defense Mapping Agency. The radiation center was selected to provide 100 meters Height Above Average Terrain based on eight cardinal radials. Height above average terrain and distance to contours were calculated and plotted at one degree horizontal azimuths.

## Allocation Studies

An allocation table is included below, showing all facilities or allotments where the spacing exceeds the required spacing by no more than 100 kilometers.

FM CHANNEL §73.207 SPACING STUDY

Job title: Aurora Allocation
Proposed latitude: N 35 16 11.00
Proposed longitude: W 76 38 32.00
Use pre-1989 Class A spacings?: N

Proposed channel: 221A

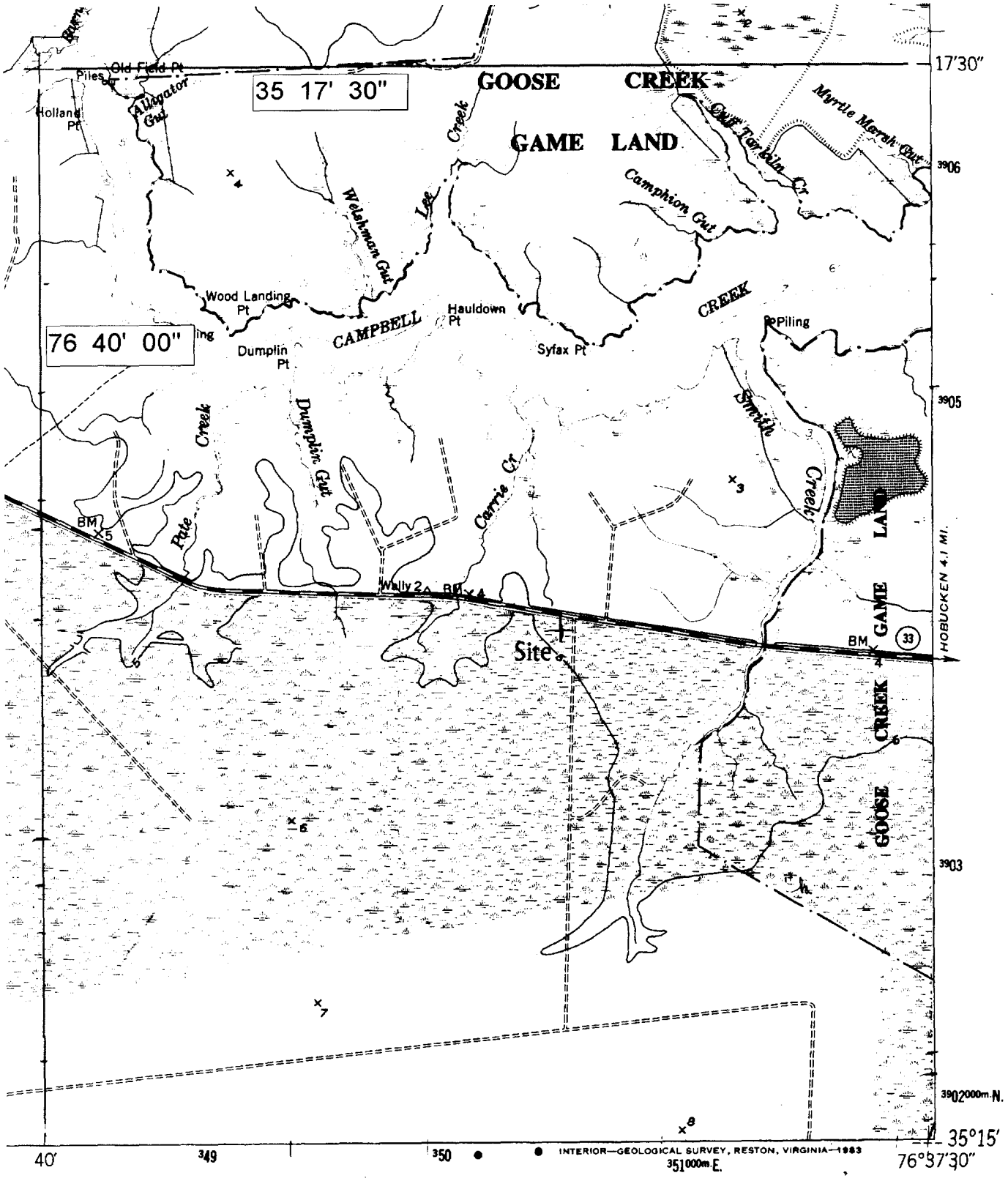
| CH | Call | Record | City | ST | Status | Bear. | Dist. | Reqd. Dist. | Result | Note |
|---|---|---|---|---|---|---|---|---|---|---|
| 222C3 | WNHW | 2479 | Nags Head | NC | LIC | 54.9 | 112.5 | 89.0 | 23.5 | |
| 218C2 | WBJD | 3089 | Atlantic Beach | NC | LIC | 198.9 | 59.8 | 55.0 | 4.8 | |
| 218C1 | WBJD | 3090 | Atlantic Beach | NC | APP | 198.9 | 59.8 | 75.0 | -15.2 | 1 |
| 224C1 | ALLOTM | 3092 | Ocracoke | NC | VACANT | 155.7 | 50.0 | 75.0 | -25.0 | 2 |
| 221A | | 3109 | Aurora | NC | ADD | 285.9 | 13.8 | 115.0 | -101.2 | 3 |
| 221C3 | WSVV | 3146 | Moyock | NC | LIC | 14.1 | 155.4 | 142.0 | 13.4 | |
| 222C2 | WQSL | 3622 | Jacksonville | NC | LIC | 221.6 | 111.1 | 106.0 | 5.1 | |
| 220A | WAAE | 3657 | New Bern | NC | LIC | 250.3 | 37.8 | 72.0 | -34.2 | 4 |
| 221A | WRSV | 3660 | Rocky Mount | NC | LIC | 301.5 | 116.5 | 115.0 | 1.5 | |
| 275A | WELSFM | 3687 | Kinston | NC | LIC | 271.3 | 93.0 | 10.0 | 83.0 | |
| 219C2 | WBKU | 3707 | Ahoskie | NC | APP | 331.0 | 104.9 | 55.0 | 49.9 | |
| 219C2 | WBKU | 3708 | Ahoskie | NC | CP | 330.9 | 98.4 | 55.0 | 43.4 | |
| 219C2 | WBKU | 3709 | Ahoskie | NC | APP | 330.8 | 104.8 | 55.0 | 49.8 | |
| 220C1 | WFSS | 4245 | Fayetteville | NC | LIC | 264.5 | 206.0 | 133.0 | 73.0 | |
| 223C | WYFL | 4288 | Henderson | NC | LIC | 307.4 | 176.3 | 95.0 | 81.3 | |

****** End of channel 221 study ******

Notes:

1. WBJD, Atlantic Beach, North Carolina, is licensed as a C2 noncommercial facility. WBJD has a pending application for increased facilities, including upgrading from Class C2 to C1, expressly dependent in part on the removal of the proposed Aurora 221A allotment. See file number BPED-19990628IB at Engineering Exhibit, page 3.
2. Defects in the vacant Ocracoke allotment are in controversy in the instant proceeding.
3. The proposed site is 13.8 kilometers from the reference coordinates for Aurora, North Carolina.
4. American Family Radio, licensee of WAAE, has provided a written commitment in the instant proceeding to propose an alternate frequency which would not be in conflict with the Aurora allotment.

Figures 3 and 4 graphically illustrate that the proposed site is fully spaced with respect to all facilities, allotments or proposals other than those identified in the notes above. Figure 4 is an enlargement of the appropriate areas of Figure 3.




SCALE 1:24 000

1 ½ 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

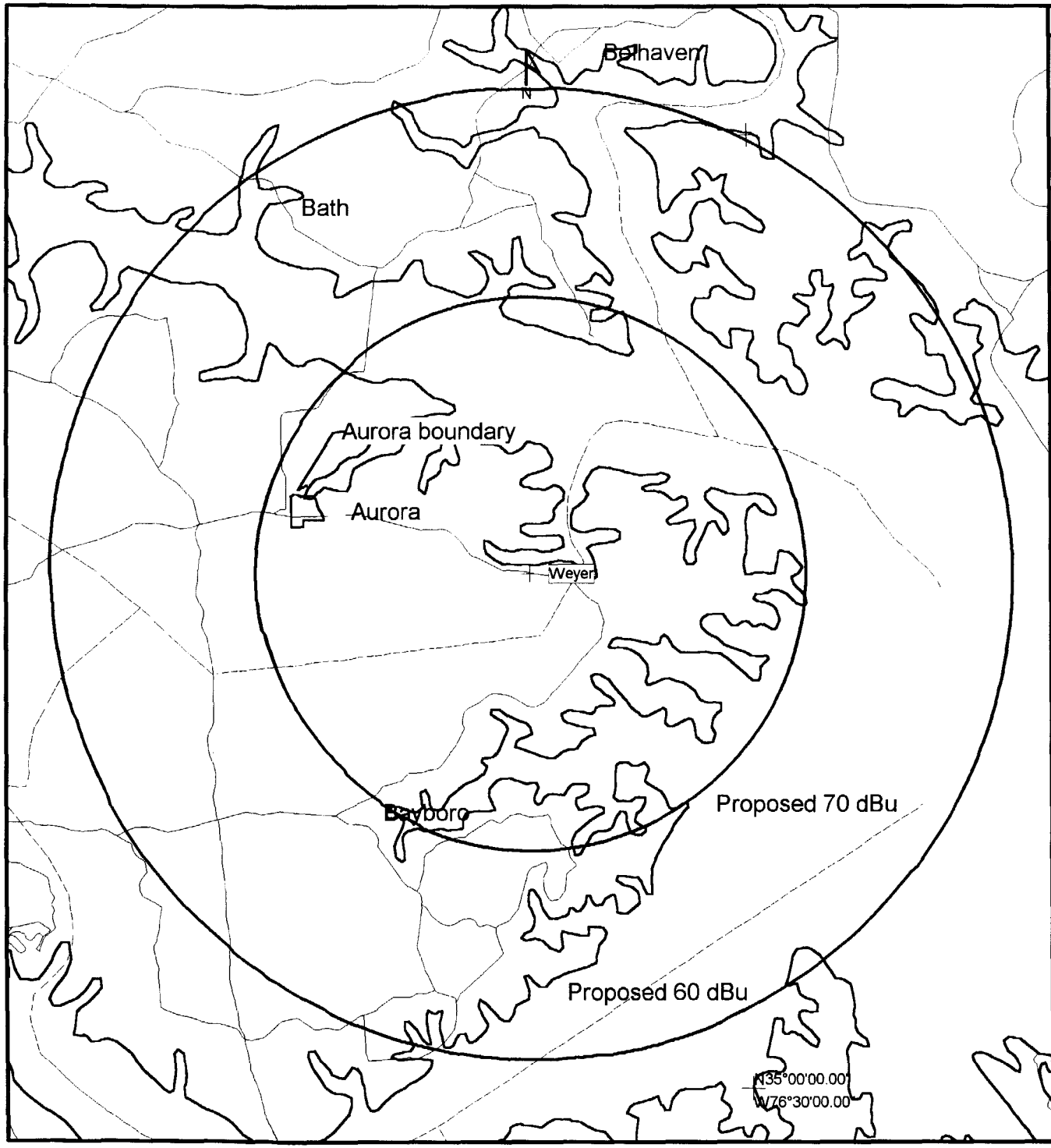
1 .5 0 1 KILOMETER

CONTOUR INTERVAL 5 FEET

SOUTH CREEK, N. C.

35076-C6-TF-024

1950
PHOTOREVISED 1983
DMA 5654 I SW-SERIES V842




FMSR™: Aurora.map

Prop. model: FCC-FCC
Time: 50.0% Loc.: 50.0%
Prediction Confidence Margin: 0.0dB
Climate: Continental Temperate
Land use (clutter): none
Atmospheric Abs.: none
K Factor: 1.333
RX Antenna - Type: OMNI
Height: 9.1 m AGL Gain: 0.00 dBd

Sites

Site: Aurora
N35°16'11.00" W76°38'32.00" 1.5 m
Weyer Tx.Ht.AGL: 99.0 m ERPd: 37.78 dBW
Grp: 1 Omni-VV/0.0° 92.1000 MHz

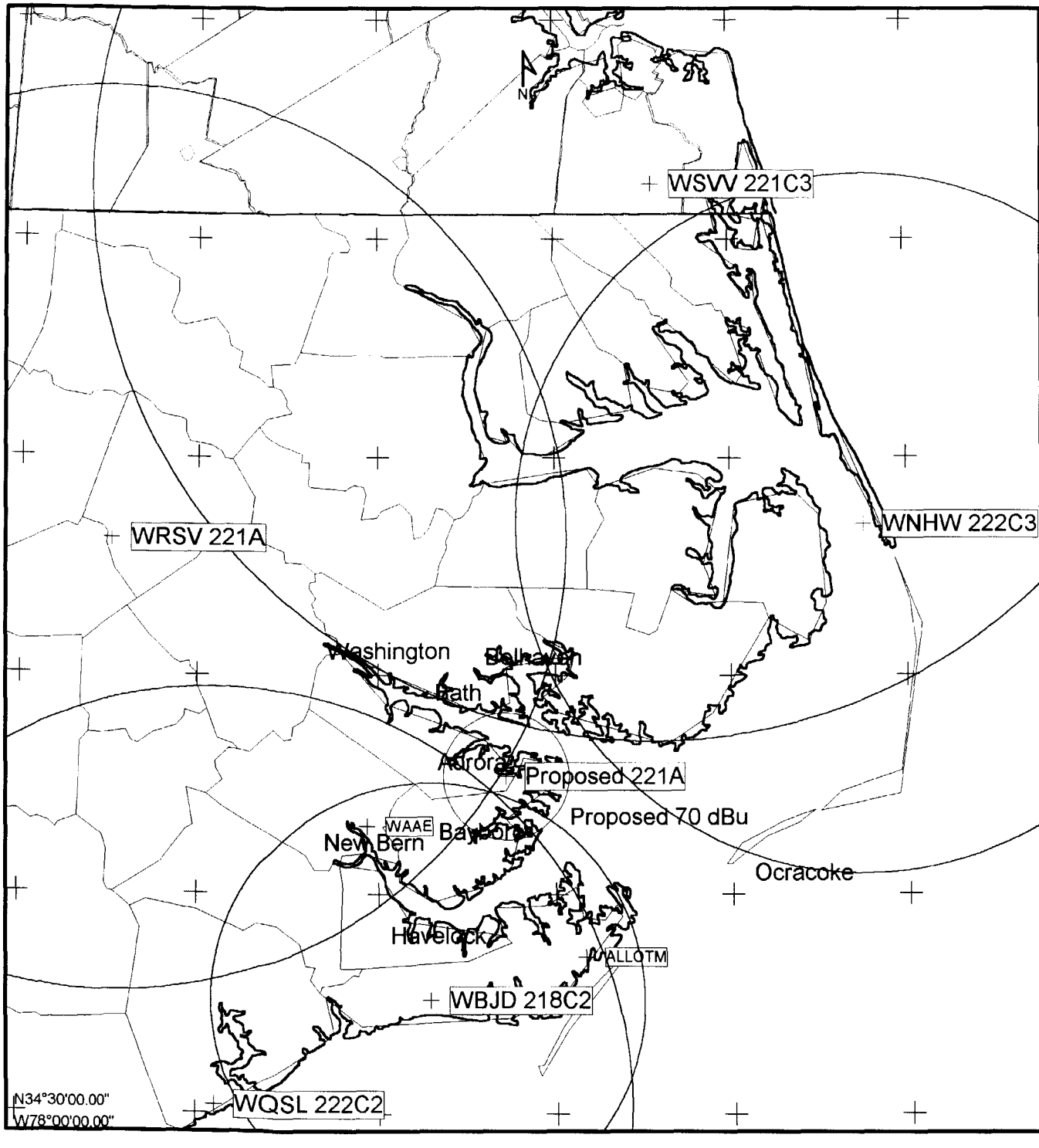
Notes

Reference grid spacing 30'

KILOMETERS
-5 0 10

Aurora
Coverage Contours

Figure 2 12 September 2000




FMSR™: Aurora.map

Sites

Site: Atlantic Beach
N34°45'34.00" W76°51'16.00" 8.0 m
WBJD Tx.Ht.AGL: 113.0 m ERPd: 46.99 dBW
Grp: 1 DA-HH/0.0° 91.5000 MHz

Site: Atlantic Beach
N34°45'34.00" W76°51'16.00" 8.0 m
WBJD001 Tx.Ht.AGL: 113.0 m ERPd: 49.29 dBW
Grp: 1 DA-HH/0.0° 91.5000 MHz

Site: Aurora
N35°16'11.00" W76°38'32.00" 1.5 m
Weyer Tx.Ht.AGL: 99.0 m ERPd: 37.78 dBW
Grp: 1 Omni-VV/0.0° 92.1000 MHz

Site: Jacksonville
N34°31'10.00" W77°26'52.00" 8.0 m
WQSL Tx.Ht.AGL: 218.0 m ERPd: 43.52 dBW
Grp: 1 Omni-HH/0.0° 92.3000 MHz

Site: Moyock
N36°37'38.00" W76°13'07.00" 6.0 m
WSVV Tx.Ht.AGL: 125.0 m ERPd: 41.61 dBW
Grp: 1 DA-HH/0.0° 92.1000 MHz

Site: Nags Head
N35°50'49.00" W75°37'19.00" 3.0 m
WNHW Tx.Ht.AGL: 114.0 m ERPd: 42.55 dBW
Grp: 1 Omni-HH/0.0° 92.3000 MHz

Site: New Bern
N35°09'17.00" W77°02'00.00" 5.7 m
WAAE Tx.Ht.AGL: 49.3 m ERPd: 31.30 dBW
Grp: 1 Omni-HH/0.0° 91.9000 MHz

Site: Ocracoke
N34°51'32.00" W76°25'00.00" 1.0 m
ALLOTM Tx.Ht.AGL: -1.0 m ERPd: 30.00 dBW
Grp: 1 Omni-HH/0.0° 92.7000 MHz

Site: Rocky Mount
N35°48'40.00" W77°44'33.00" 30.0 m
WRSV Tx.Ht.AGL: 161.0 m ERPd: 33.71 dBW
Grp: 1 Omni-HH/0.0° 92.1000 MHz

Notes

Reference grid spacing 30'

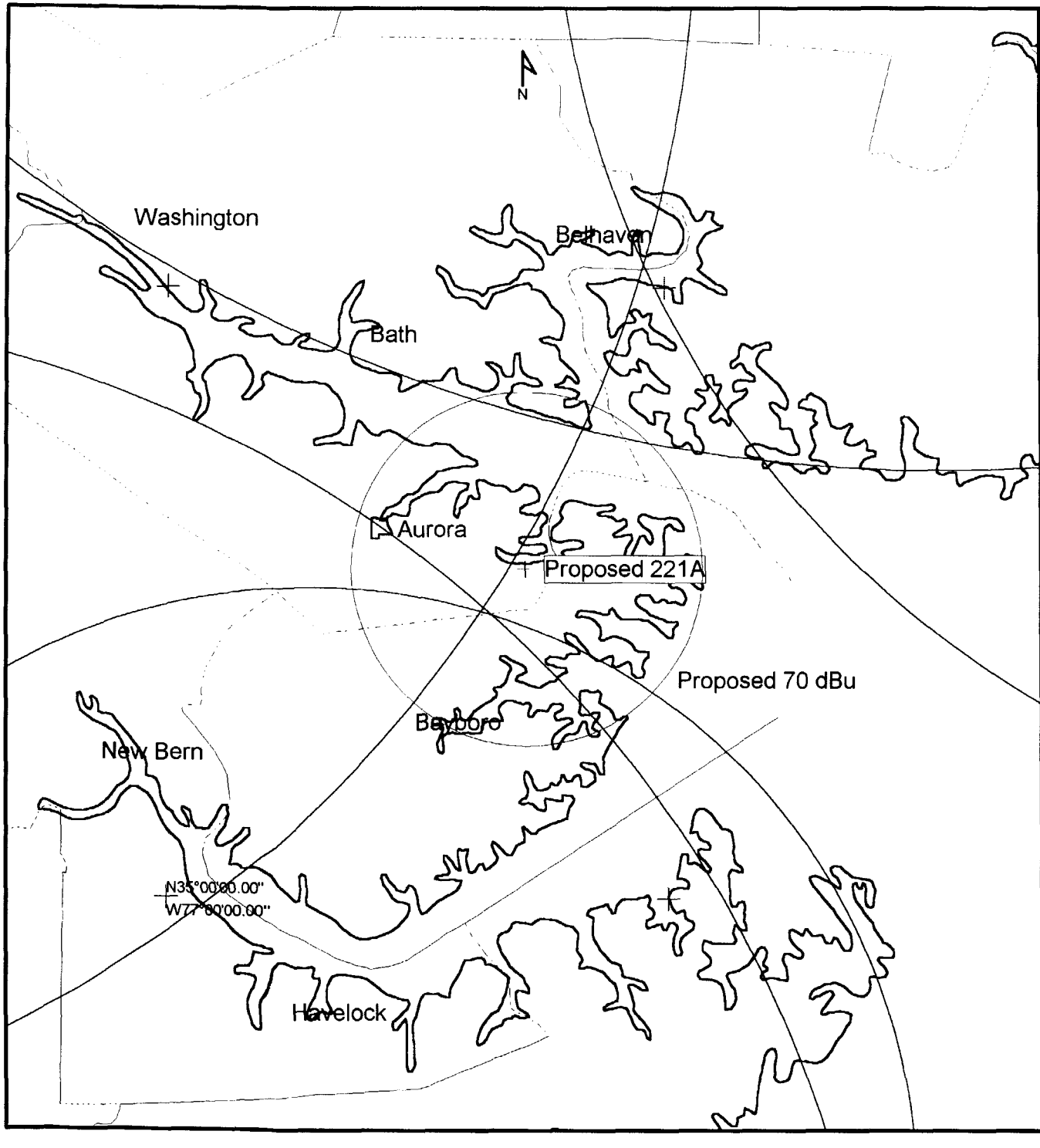
KILOMETERS

-25 0 25

Aurora

221A Spacing Study

Figure 3 12 September 2000




FMSR™: Aurora.map

Sites

Site: Atlantic Beach
N34°45'34.00" W76°51'16.00" 8.0 m
WBJD Tx.Ht.AGL: 113.0 m ERPd: 46.99 dBW
Grp: 1 DA-HH/0.0° 91.5000 MHz

Site: Aurora
N35°16'11.00" W76°38'32.00" 1.5 m
Weyer Tx.Ht.AGL: 99.0 m ERPd: 37.78 dBW
Grp: 1 Omni-VV/0.0° 92.1000 MHz

Site: Jacksonville
N34°31'10.00" W77°26'52.00" 8.0 m
WQSL Tx.Ht.AGL: 218.0 m ERPd: 43.52 dBW
Grp: 1 Omni-HH/0.0° 92.3000 MHz

Site: Moyock
N36°37'38.00" W76°13'07.00" 6.0 m
WSVV Tx.Ht.AGL: 125.0 m ERPd: 41.61 dBW
Grp: 1 DA-HH/0.0° 92.1000 MHz

Site: Nags Head
N35°50'49.00" W75°37'19.00" 3.0 m
WNHW Tx.Ht.AGL: 114.0 m ERPd: 42.55 dBW
Grp: 1 Omni-HH/0.0° 92.3000 MHz

Site: Rocky Mount
N35°48'40.00" W77°44'33.00" 30.0 m
WRSV Tx.Ht.AGL: 161.0 m ERPd: 33.71 dBW
Grp: 1 Omni-HH/0.0° 92.1000 MHz

Notes

Reference grid spacing 30'

KILOMETERS

-5 0 20

Aurora

221A Spacing Study: Details

Figure 4 12 September 2000

# EXHIBIT D

DUPLIN COUNTY BROADCASTERS

TRENTON, NORTH CAROLINA

NARRATIVE

This exhibit has been prepared for Duplin County Broadcasters. Its purpose is to demonstrate technical deficiencies in Ocracoke Broadcasters one-step application to upgrade its facility from channel 225A to 224C1 at Ocracoke,North Carolina (BMPH-950728IC).

The Ocracoke Broadcasters application for construction permit does not meet the requirements of §73.315(a). Figure 1 is a map that shows the proposed transmitter site, the Community of Ocracoke, and the 70 dBu contour. The distance to the contour was calculated by using the geographic coordinates, antenna height and power shown in the application.

As shown on Figure 1, the 70 dBu contour is approximately four kilometers from the center of the community. As further evidence that the application is deficient in city-grade coverage, refer to the coverage map in the Ocracoke Broadcasters application at E-6. This map also shows the 70 dBu contour approximately four kilometers short of the community center.

Figure 2 is a portion of the USGS 1:24,000 scale topographic map of Ocracoke. The eastern boundary of the Community of Ocracoke is defined by the boundary of the Cape Hatteras National Seashore. Figure 2 has a cross mark at the eastern boundary of the community which is at geographic coordinates 35° 06′ 52" north latitude and 75° 57′ 48" west longitude.

The distance from the allotment reference coordinates to this boundary is 50.17 kilometers on an azimuth of 055.6 degrees, as calculated by the method outlined in §73.208(c). Using the maximum power and antenna height of 100 kilowatts and 299 meters HAAT at the Ocracoke reference point, the 70 dBu contour falls at 50.0 kilometers, which is 0.17 kilometers short of the community boundary. A table of distances to the 70 dBu contour is shown on page 4.

DUPLIN COUNTY BROADCASTERS

TRENTON, NORTH CAROLINA

NARRATIVE...(continued)

This exhibit has shown that a class C1 facility operating at maximum permitted power and height at the Ocracoke reference point does not provide complete coverage of the principal community. It has also shown that the application for construction permit filed by Ocracoke Broadcasters falls far short of meeting the requirements of §73.315, therefore Ocracoke Broadcasters attempt to allocate channel 224C1 to Ocracoke by the "one-step" process has failed.

Predicted Signal Contours:

34 51 32 - DISTANCE TO THE 70 dBu CONTOUR FOR THE PROPOSED
76 25 00 - ALLOTMENT OF CHANNEL 224C1 TO OCRACOKE, NORTH CAROLINA

ERP = 100 kW, 20 dBk FM - 2-6 Tables

| Radial | HAAT | kW | dBk | Field | 70 dBu.5 |
|---|---|---|---|---|---|
| 0 Degs. | 299.0M | 100.000 | 20.000 | 1.000 | 50.0 |
| 45 Degs. | 299.0M | 100.000 | 20.000 | 1.000 | 50.0 |
| 90 Degs. | 299.0M | 100.000 | 20.000 | 1.000 | 50.0 |
| 135 Degs. | 299.0M | 100.000 | 20.000 | 1.000 | 50.0 |
| 180 Degs. | 299.0M | 100.000 | 20.000 | 1.000 | 50.0 |
| 225 Degs. | 299.0M | 100.000 | 20.000 | 1.000 | 50.0 |
| 270 Degs. | 299.0M | 100.000 | 20.000 | 1.000 | 50.0 |
| 315 Degs. | 299.0M | 100.000 | 20.000 | 1.000 | 50.0 |

Ave. HAAT= 299.0M, Ant. COR= 299.0M AMSL

Other Azimuths:

| | | | | | |
|---|---|---|---|---|---|
| 55 Degs. | 299.0M | 100.000 | 20.000 | 1.000 | 50.0 |
| 56 Degs. | 299.0M | 100.000 | 20.000 | 1.000 | 50.0 |

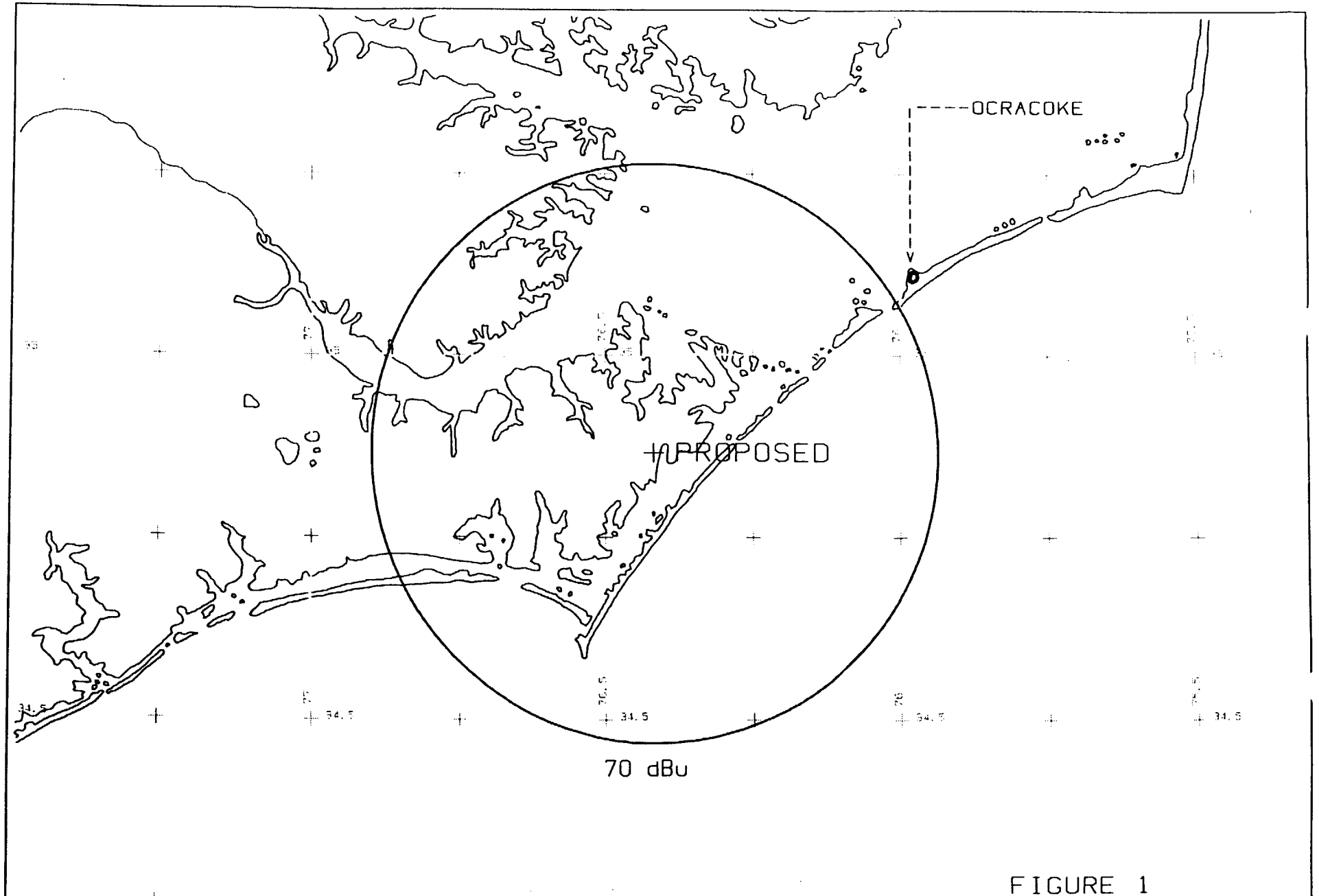



FIGURE 1

| | | |
|---|---|---|
| Scale in km<br>0 10 20 30 40 | THE 70 dBu CONTOUR FOR WAHL AS PROPOSED BY OCRACOKE BROADCASTERS ON CHANNEL 224C1 | DUPLIN COUNTY BROADCASTERS<br>TRENTON, NORTH CAROLINA |

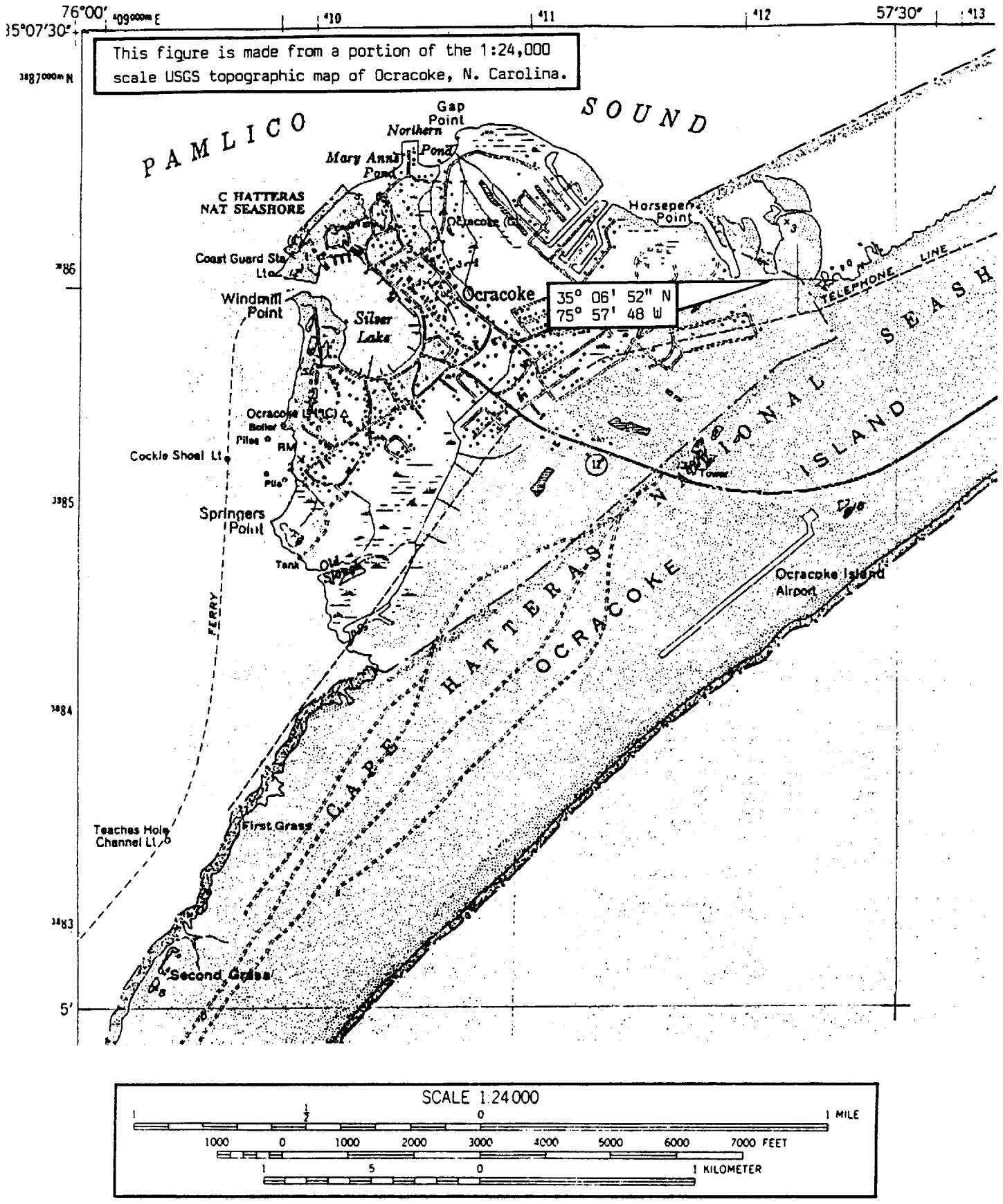



FIGURE 2

OCRACOKE COMMUNITY BOUNDARY

DUPLIN COUNTY BROADCASTERS
TRENTON, NORTH CAROLINA

# EXHIBIT E

**Predicted Signal Contours:**

34 51 32.3 OCRACOKE NC
76 25 00

ERP = 100 kW, 20 dBk FM - 2-6 Tables

| Radial | HAAT | kW | dBk | Field | 70 dBu.5 |
|---|---|---|---|---|---|
| 0 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 1 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 2 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 3 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 4 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 5 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 6 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 7 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 8 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 9 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 10 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 11 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 12 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 13 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 14 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 15 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 16 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 17 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 18 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 19 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 20 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 21 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 22 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 23 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 24 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 25 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 26 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 27 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 28 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 29 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 30 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 31 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 32 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 33 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 34 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 35 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 36 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 37 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 38 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 39 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 40 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 41 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 42 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 43 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 44 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 45 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 46 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 47 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 48 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 49 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 50 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 51 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 52 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 53 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 54 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 55 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 56 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 57 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 58 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |

| | | | | | | |
|---|---|---|---|---|---|---|
| 59 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 60 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 61 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 62 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 63 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 64 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 65 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 66 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 67 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 68 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 69 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 70 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 71 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 72 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 73 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 74 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 75 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 76 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 77 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 78 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 79 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 80 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 81 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 82 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 83 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 84 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 85 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 86 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 87 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 88 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 89 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 90 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 91 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 92 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 93 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 94 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 95 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 96 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 97 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 98 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 99 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 100 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 101 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 102 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 103 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 104 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 105 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 106 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 107 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 108 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 109 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 110 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 111 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 112 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 113 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 114 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 115 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 116 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 117 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 118 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 119 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 120 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 121 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 122 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 123 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 124 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 125 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 126 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 127 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 128 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |

| | | | | | | |
|---|---|---|---|---|---|---|
| 129 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 130 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 131 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 132 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 133 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 134 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 135 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 136 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 137 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 138 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 139 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 140 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 141 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 142 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 143 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 144 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 145 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 146 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 147 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 148 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 149 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 150 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 151 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 152 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 153 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 154 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 155 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 156 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 157 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 158 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 159 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 160 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 161 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 162 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 163 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 164 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 165 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 166 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 167 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 168 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 169 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 170 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 171 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 172 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 173 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 174 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 175 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 176 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 177 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 178 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 179 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 180 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 181 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 182 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 183 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 184 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 185 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 186 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 187 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 188 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 189 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 190 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 191 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 192 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 193 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 194 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 195 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 196 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 197 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 198 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |

| | | | | | | |
|---|---|---|---|---|---|---|
| 199 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 200 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 201 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 202 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 203 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 204 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 205 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 206 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 207 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 208 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 209 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 210 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 211 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 212 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 213 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 214 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 215 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 216 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 217 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 218 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 219 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 220 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 221 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 222 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 223 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 224 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 225 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 226 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 227 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 228 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 229 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 230 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 231 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 232 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 233 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 234 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 235 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 236 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 237 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 238 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 239 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 240 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 241 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 242 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 243 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 244 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 245 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 246 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 247 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 248 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 249 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 250 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 251 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 252 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 253 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 254 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 255 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 256 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 257 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 258 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 259 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 260 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 261 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 262 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 263 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 264 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 265 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 266 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 267 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 268 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |

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|---|---|---|---|---|---|---|
| 269 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 270 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 271 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 272 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 273 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 274 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 275 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 276 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 277 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 278 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 279 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 280 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 281 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 282 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 283 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 284 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 285 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 286 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 287 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 288 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 289 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 290 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 291 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 292 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 293 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 294 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 295 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 296 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 297 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 298 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 299 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 300 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 301 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 302 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 303 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 304 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 305 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 306 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 307 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 308 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 309 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 310 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 311 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 312 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 313 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 314 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 315 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 316 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 317 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 318 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 319 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 320 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 321 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 322 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 323 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 324 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 325 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 326 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 327 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 328 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 329 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 330 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 331 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 332 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 333 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 334 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 335 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 336 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 337 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 338 | Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |

| | | | | | |
|---|---|---|---|---|---|
| 339 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 340 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 341 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 342 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 343 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 344 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 345 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 346 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 347 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 348 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 349 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 350 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 351 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 352 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 353 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 354 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 355 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 356 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 357 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 358 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |
| 359 Degs. | 300.0M | 100.000 | 20.000 | 1.000 | 50.1 |

Ave. HAAT= 300.0M, Ant. COR= 300.0M AMSL

## CERTIFICATE OF SERVICE

I, Regina S. McFadden, a secretary in the law firm of Pepper & Corazzini, L.L.P., do hereby certify that true copies of the foregoing "Reply to Opposition To Application For Review" were sent this 15th day of September, 2000, by U.S. first class mail, postage prepaid, to the following:

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