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October 5, 2000

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OCT 5 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Re: **Public Notice of Counterproposal**
In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Exmore and Cheriton, Virginia, and Fruitland, Maryland)
MM Docket No. 99-347, RM-9751, RM-9761

Dear Ms. Salas:

On behalf of Great Scott Broadcasting, I am transmitting herewith an original and four copies of its Reply Comments in the above-referenced matter.

Should there be any questions concerning this matter, please contact the undersigned.

Very truly yours,

Ross G. Greenberg

RGG:rg
Enclosures

No. of Copies rec'd 0+4
List A B C D E

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b),	)	MM Docket No. 99-347
Table of Allotments,	)	RM-9751
FM Broadcast Stations.	)	RM-9761
(Exmore and Cheriton, Virginia, and	)	
Fruitland, Maryland)	)	
	)	

RECEIVED

OCT 5 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch

REPLY COMMENTS OF GREAT SCOTT BROADCASTING TO COUNTERPROPOSAL

Great Scott Broadcasting ("Great Scott"), licensee of Broadcast Station WKHI(FM), Exmore, Virginia, by its attorneys, hereby responds to the Commission's September 20, 2000 Public Notice, Report No. 2440 (the "Public Notice"), concerning Be-More Broadcasting's ("Be-More") August 11, 1999 Supplement (the "Supplement") to a July 27, 1999 Petition to Amend the FM Table of Allotments (the "Be-More Petition"). The Commission stated in its Public Notice that it would treat the Supplement as a counterproposal in the above-captioned proceeding, and established October 5, 2000 as the deadline for filing reply comments.

I. BACKGROUND

On December 10, 1999, the Commission released a Notice of Proposed Rule Making in this proceeding, DA 99-2758 (the "Notice") in response to: (1) Great Scott's September 7, 1999 Petition for Rule Making (the "Great Scott Petition"), requesting that the Commission institute a rule making proceeding to amend Section 73.202(b), the FM Table of

Allotments, by deleting Channel 298B at Exmore, Virginia, and assigning Channel 298B1 for use at Fruitland, Maryland; and (2) the July 27, 1999 Be-More Petition proposing the reallotment of Channel 291B1 from Exmore to Cheriton, Virginia.[1/] Great Scott and Be-More each submitted comments to the Notice on January 31, 2000 (respectively, "Great Scott Comments" and "Be-More Comments"). Cumulus Licensing Corp. ("Cumulus"), Sound Enterprises, Inc. ("Sound") and Exmore-Nassawadox Radio Partners also filed comments. Great Scott and Be-More each submitted reply comments on February 15, 2000 (respectively, "Great Scott Reply Comments" and "Be-More Reply Comments"). Cumulus and Sound also filed reply comments.

The Notice sought comment on, *inter alia*, Be-More's proposal to reallocate Channel 291B1 from Exmore to Cheriton. Great Scott's comments and accompanying analysis primarily addressed this specific proposal. In its comments, however, Be-More stated that "in supplemental engineering filed on August 11, 1999, Be-More requested that Channel 291B be allocated to Cheriton, Virginia. In these Comments, Be-More reasserts its interest in and requests the allocation of Channel 291B to Cheriton." Be-More Comments at n.2 (emphasis in original). After conducting multiple searches at the Commission, Great Scott was only able to locate the Supplement on the reply comment deadline, February 15, 2000. Although Great Scott did anticipate the proposal contained in the Supplement in certain respects in its reply comments, it now comments on the fundamental issue raised by the Notice -- whether grant of Be-More's counterproposal would best serve the public interest.

1/ On April 24, 1998, the Commission granted a construction permit to Be-More for Channel 291B1, allotted to Exmore.

II. THE PUBLIC INTEREST BENEFITS OF GREAT SCOTT'S PROPOSAL ARE A MATTER OF RECORD IN THIS PROCEEDING

Be-More argues that its Channel 291B proposal at Cheriton should be preferred over Great Scott's proposal to allocate Channel 298B1 for use at Fruitland. Great Scott has, however, clearly identified the dispositive public interest benefits of its proposal. Fruitland is a thriving, independent community deserving of a first local service. See Great Scott Petition at 2; Great Scott Comments at 4; Great Scott Reply Comments at 6-7. Great Scott's proposed operation of WKHI(FM) on Channel 298B1 at Fruitland will result in an increase in coverage from 2,521 square kilometers containing 62,468 people to 3,724 square kilometers containing 124,544 people. Great Scott Comments at 2. There would be a gain area of 2,640 square kilometers containing 95,889 people and a loss area of only 1,437 square kilometers with 33,813 people, resulting in a net gain of 62,076 people in 1,203 square kilometers. Id. at 2-3. The entire loss area is well served during the day, with at least 5 daytime reception services over the entire area. Id. at 3. Operations from the proposed site would not create any nighttime white or gray area, *but would eliminate a nighttime gray area of 73 square kilometers containing 647 people, in furtherance of priority two of the Commission's allotment criteria.* Id.[2] The particulars of

---

[2] The allotment priorities are as follows:

(1) First full-time aural service;
(2) Second full-time aural service;
(3) First local service; and
(4) Other public interest matters.

Co-equal weight is given to priorities (2) and (3). Since Fruitland would receive its first local service under the proposal, Great Scott's proposal also satisfies priority three.

Be-More's proposal do nothing to diminish the undeniable benefits to be gained from the allocation of Channel 298B1 for use at Fruitland.

III. GREAT SCOTT'S CONTINGENT PROPOSAL TO ALLOCATE CHANNEL 297A TO CHERITON MAY BE CONSIDERED BY THE COMMISSION AND IS SUPERIOR TO BE-MORE'S COUNTERPROPOSAL

In its February 15, 2000 reply comments, Be-More has quibbled with Great Scott's proposal that, if the Commission decides to treat Cheriton as a community for allotment purposes (despite Great Scott's argument to the contrary), the Commission should grant Great Scott's proposed relocation to Fruitland and also allot Channel 297A at Cheriton. Great Scott Comments at 4-5. Be-More claims that Great Scott has failed to provide a technically and procedurally correct counterproposal. Be-More Reply Comments at 6-7.

In support, Be-More cites two cases that dismissed counterproposals that were rife with procedural and technical deficiencies and are wholly inapposite. In Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Fort Bragg, California), 6 FCC Rcd 5817 (1991), the counterproposal in question: (i) would not have satisfied the Commission's principal city grade coverage requirement; (ii) did not state the counterproponent's intention to apply for the channel if allotted; (iii) requested modification of the subject station to a nonadjacent channel; and (iv) failed to provide a technical showing to demonstrate that the proposal complied with the Commission's minimum distance separation requirements. In stark contrast, under Great Scott's proposal: (i) the proposed allotment of Channel 297A to Cheriton will provide principal city grade coverage to Cheriton; (ii) Great Scott explicitly stated that it will apply for the channel if allotted, see Great Scott Comments at 5; (iii) the proposal does not contemplate the reallotment of an existing station to a nonadjacent channel; and (iv) Great Scott

provided a technical statement confirming that the proposal complies with the Commission's minimum distance separation requirements, see engineering statement attached to Great Scott Comments at 3 and Exhibit RM-3. Although the engineering statement attached to the Great Scott Comments informs all interested parties that the minimum distance separation requirements are met, the Engineering Statement of Cohen Dippell and Everist, P.C. (the "Engineering Statement"), annexed hereto as **Attachment 1**, reiterates this point and, for the Commission's convenience, includes a table setting forth actual and required separation between the proposed station and existing stations and contains an additional map illustrating the contours of the proposed station and existing area stations. This material merely confirms what Great Scott had stated previously in this proceeding, a factual reality that Be-More has never questioned -- Channel 297A can be allotted to Cheriton in a manner consistent with FCC minimum distance separation requirements if Great Scott's Fruitland proposal is granted.

In the other case cited by Be-More, Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Lincoln, Osage Beach, Steelville and Warsaw, Missouri), 11 FCC Rcd 6372 (1996), the Commission denied a counterproposal because it had not provided pertinent geographical and population data necessary to do a comparison between two mutually exclusive upgrades. Here, the record contains the requisite area and population data comparing Great Scott's Fruitland and Be-More's Cheriton proposals. Great Scott's previously proposed addition of Channel 297A at Cheriton would bring indisputable first local service benefits as well as obvious, additional coverage benefits. Again, for the Commission's convenience, the Engineering Statement states that Channel 297A at Cheriton would bring new service to 14,735 persons in 677 square kilometers. Be-More's hyper-technical argument is therefore meritless.

Be-More's claim that Great Scott has not proposed a technically feasible site for Channel 297A at Cheriton and its reliance on a letter from a local attorney are similarly unavailing. The Commission has held that such speculation is without value, particularly in the absence of showings or testimony from local zoning officials or environmental groups to substantiate such claims. See Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Kerman, California), 11 FCC Rcd 2887 (1996) at ¶ 9 ("While petitioner claims that the area to accommodate Channel 237A is near the Kerman Ecological Reserve, perhaps invoking environmental and zoning issues, as well as possibly invoking an air hazard concern, we find those allegations are speculative. Petitioner has provided no showings or testimony from local zoning officials or environmental groups to substantiate that a station could not be constructed on Channel 237A within the fully spaced area specified in [proponent's] comments to accommodate the allotment."). See also Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Rocky Mount, Bassett and Stanleytown, Virginia), 10 FCC Rcd 9285 (1995) at n.8; Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Beverly Hills, Chiefland, Holiday, Micanopy and Sarasota, Florida), 8 FCC Rcd 2197 (1993) at ¶ 6.

Finally, Be-More claims that the instant proceeding deals exclusively with proposals to change communities of license and that, because the Notice does not inform the public that any new channel allocation is contemplated, none may be proposed. Be-More Reply Comments at 7. Be-More's assertion contradicts established Commission doctrine, which states that where the Commission's Notice of Proposed Rule Making specifically advises the public that the filing of a counterproposal may lead the Commission to allot a different channel than

was requested for any of the communities involved, any such decision may be viewed as a "logical outgrowth" of the proposal set forth in such Notice, and the Commission need not issue a separate Notice for every channel under consideration. See Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Perry, Cross City, Holiday, avon Park, sarasota and Live Oak, Florida; Thomasville, Georgia), 11 FCC Rcd 4643 (1996) at ¶ 6; Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Sothampton, Bridgehampton, Westhampton and Calverton-Roanoke, New York), 10 FCC Rcd 6887 (1995) at ¶ 5; Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Pinewood, South Carolina), 4 FCC Rcd 8536 (1989) at ¶ 4. The Commission did so inform the public, in paragraph 3(c) of the Notice, and Great Scott's proposal to allot Channel 297A to Cheriton is therefore entirely valid.

Great Scott's proposal to allot Channel 297A would satisfy Be-More's professed public interest goal: providing Cheriton with a first local service. Given Be-More's declared intent, its criticisms of Great Scott's Channel 297A proposal come with poor grace. Great Scott has presented in a timely fashion a viable option should the Commission decide that Cheriton is a community for allotment purposes. Great Scott's proposal merits consideration and, if Cheriton is found to be a community, merits grant.

IV. GRANT OF BE-MORE'S PROPOSAL WOULD RESULT IN A NET LOSS OF SERVICE TO ALMOST 20,000 PEOPLE, WITH THE ENTIRE GAIN AREA ALREADY WELL-SERVED

In its reply comments, Great Scott commented on Be-More's amended proposal to allot Channel 291B (rather than Channel 291B1) to Cheriton and compared it to Be-More's proposed operations pursuant to its one-step application for Channel 291B at Exmore. Great Scott pointed out that a class B channel at Cheriton rather than Exmore would result in a net *loss*

of service to 19,133 persons in 615 square kilometers, with Be-More's entire proposed gain area already well-served by at least 5 reception services.[3/] Great Scott Reply Comments at 2-3. The results of this analysis have not changed since February. Rather than offering coverage benefits, Be-More's proposal contemplates a significant net loss of service. Even Be-More concedes that a net loss will result. Be-More Comments at 3.

V. AWARDING AN ALLOTMENT PREFERENCE TO BE-MORE FOR ITS LACK OF DILIGENCE WOULD UNDERMINE THE COMMISSION'S RULE MAKING PROCESSES

It has been almost six months since reply comments were filed in this matter, and Be-More's deadline to built its Exmore facilities is now six months closer. It appears that Be-More has not yet taken any significant steps towards building its Exmore station.[4/] As Great Scott has pointed out, the Commission has previously stated that, within allotted construction periods, permittees should "be advised that we expect station construction to commence and be brought to fruition expeditiously." Report and Order, Amendment of Section 73.3598 and Associated Rules Concerning the Construction of Broadcast Stations, 102 FCC 2d 1054 (1985)

3/ Great Scott also pointed out that the engineering study contained in Be-More's comments used the wrong predicted contour as a basis for its analysis, and its population and area data could not be used. Furthermore, Be-More's engineering statement inaccurately stated that Be-More's proposal would provide service to underserved areas. Rather than compare Be-More's proposal to the facilities authorized in its construction permit, Be-More's engineering statement improperly assumed that Be-More's construction permit *did not even exist* in reaching its conclusion that the proposed facilities would provide service to underserved areas.

4/ In its reply comments, Be-More took issue with Great Scott's assertion that Be-More has not diligently constructed its facilities. Be-More's professed indignation does not refute Great Scott's assertion, however, nor does Be-More offer any evidence that it *has* taken steps to construct its facilities. Based on Great Scott's review of the Commission's files and its familiarity with the Exmore area, Great Scott's assertion appears to remain accurate even at this late date.

at ¶ 4. More recently, the Commission, in adopting a hard and fast three-year construction period, did not signal a retreat from its requirement that permittees diligently construct their broadcast facilities, but rather adopted an administrative solution that balanced its "*fundamental* interests in *expediting* new service to the public and *preventing* the *warehousing* of scarce spectrum, and [the Commission's] recognition that there are legitimate obstacles that may prevent the *rapid* construction of broadcast facilities." 1998 Biennial Regulatory Review -- Streamlining of Mass Media Applications, Rules, and Processes; Policies and Rules Regarding Minority and Female Ownership of Mass Media Facilities, 13 FCC Rcd 23056 at ¶ 90 (1998) (the "1998 Streamlining Order") (emphasis added). Station modifications voluntarily pursued by permittees, such as Be-More's proposal here, do not provide grounds for extension of the construction period. See 1998 Streamlining Order at ¶ 84; Temple University of the Commonwealth System of Higher Education; For Extension of Time to Construct and For Modification of Construction Permit WRTL(FM), Ephrata, Pennsylvania, 13 FCC Rcd 13668 (1998) at ¶ 10; Deltaville Communications For Reinstatement and Extension of Construction Permit for Unbuilt Station WLUD-FM, Deltaville, Virginia, 11 FCC Rcd 10793 (1996) at ¶ 12.

The Commission should not squander this opportunity to enforce its strict three-year deadline. It should hold Be-More to its responsibility to *build a station pursuant to the construction permit it has been granted.* In the normal course, Be-More should have long ago constructed the station it said it would build in Exmore and *then* pursued modifications. Its transparent reason for not doing so is to try to cling to an advantage it believes it gains from having an unbuilt station. At this stage, Be-More will need not only a grant of its proposal in this proceeding, but grant of an implementing FCC Form 301 Application before it can even begin

construction of its proposed Cheriton station in advance of the deadline of April 24, 2001. The Commission should not reward Be-More's continuing gamesmanship. It should reject Be-More's argument, deny the Be-More Petition and Supplement, and effectively hold Be-More to its commitment to build a station in Exmore. In any event, Great Scott has provided the Commission with ample public interest benefits to justify grant of its proposed allotment of Channel 298B1 at Fruitland, Maryland.

VI. CONCLUSION

Great Scott respectfully submits that the allotments proposed in its petition as set forth in the Notice and counterproposed in the Great Scott Comments would serve the public interest and should be implemented. For the reasons set forth above, the Commission should grant the Great Scott Petition and deny the Be-More Petition and Supplement.

Respectfully submitted,

GREAT SCOTT BROADCASTING

By: Dennis P. Corbett

Dennis P. Corbett
Ross G. Greenberg

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2000 K Street, N.W.
Suite 600
Washington, DC 20006-1809
202-429-8970

October 5, 2000

Its Attorneys

143318

ATTACHMENT 1

ENGINEERING STATEMENT
RE REPLY COMMENTS OF GREAT SCOTT BROADCASTING IN RESPONSE TO THE FCC PUBLIC NOTICE DATED SEPTEMBER 20, 2000 (REPORT NO. 2440) MM DOCKET 99-347, RM-9761, TO CHANGE CLASSIFICATION OF FM CHANNEL AND COMMUNITY OF LICENSE FOR WKHI, EXMORE, VIRGINIA

OCTOBER 2000

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Sudhir K. Khanna, being duly sworn upon his oath, deposes and states:

That he is a registered professional engineer in the District of Columbia, holds the degree of Master of Science in Electrical Engineering, and is Secretary-Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio-Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction; and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts, he believes them to be true.

S. K. Khanna

Sudhir K. Khanna
District of Columbia
Professional Engineer
Registration No. 8057

Subscribed and sworn to before me this 5th day of October, 2000.

Carol L. Tyson
Notary Public

My Commission Expires:
2/28/2003

This engineering statement has been prepared on behalf of Great Scott Broadcasting (Great Scott), licensee of FM station WKHI, Exmore, Virginia, and in support of its reply comments in response to the Commission's Public Notice dated September 20, 2000 (Report No. 2440) relating to the proposed rule making (RM-9761) in MM Docket 99-347. In this proceeding, Great Scott has proposed the deletion of Channel 298B1 at Exmore, Virginia and allotment of Channel 298B1 at Fruitland, Maryland. In a separate but related rule making (RM-9751) Be-More Broadcasting (Be-More) originally proposed the reallocation of Channel 291B1 from Exmore to Cheriton, Virginia. Be-More has on file a one-step upgrade application (BMPH-980630IC) for Channel 291B at Exmore, Virginia. In a supplemental filing to its rule-making petition, Be-More requested the allotment of Channel 291B to Cheriton, Virginia.

In RM-9751, the Commission requested Be-More to provide data concerning the population and area to be served by its proposed Channel 291B1 allotment at Cheriton, Virginia. In addition, Be-More was asked to provide population and area data for the gain and loss areas which would be created by the re-allotment of Channel 291B1 from Exmore to Cheriton, Virginia. As previously indicated in Great Scott's February 15, 2000 reply comments, a review of Be-More's comments indicates it has used the 0.71 mV/m (57dBu) contour as the basis for its proposed Channel 291B1 allotment at Cheriton. The same contour has also been used to analyze the gain and loss areas. The use of a 0.71 mV/m (57 dBu) contour for the Channel 291B1 allotment is inappropriate. According to the Commission's policy governing allotment proceedings, a value of 1.0 mV/m (60 dBu) must be used for coverage and gain and loss analysis for all classes of FM stations (see Greenup, Kentucky and Athens, Ohio, 6 FCC Rcd 1493 (1991)). Therefore, the population data provided by Be-More for its proposed Channel 291B1

allotment at Cheriton, Virginia is not valid and cannot be used for comparison with the proposed allotment of Channel 298B1 to Fruitland, Maryland.

In its comments, Be-More also indicated that it submitted a supplemental engineering statement in August 1999, requesting the allotment of Channel 291B to Cheriton in lieu of Channel 291B1. Great Scott was only able to obtain a copy of the Channel 291B proposal from the Commission's files the day reply comments were due, February 15, 2000. Be-More indicates it used the 0.5 mV/m (54 dBu) contour as the basis for the proposed Channel 291B allotment at Cheriton, Virginia. Again, the use of the 0.5 mV/m (54 dBu) contour for Channel 291B is inappropriate. According to the Commission's policy, Be-More must provide population and area data for its proposed Channel 291B allotment based on the 1.0 mV/m (60 dBu) contour.

Therefore, the gain and loss studies provided by Be-More for Class B and B1 allotment are not appropriate.

As indicated earlier, Be-More has previously proposed the allotment of Channel 291B at Exmore, Virginia by filing a one-step upgrade application (BMPH-980630IC). Great Scott has analyzed coverage and gain and loss areas that would result when comparing Be-More's two Class B proposals at Exmore and Cheriton, Virginia (see Exhibits E-1 and E-2). The attached Table I shows the population and area comparisons when considering the two Class B proposals. Table I indicates that the Cheriton Class B proposal would result in a loss of 20,134 people and 637 square kilometers and a gain area of 1,001 people and 22 square kilometers compared to Class B station at Exmore, Virginia. This represents a net loss of 19,133 people and 615 square km area.

The gain areas of Cheriton Class B proposal with respect to Class B station at Exmore, Virginia are well served by more than five aural services by other FM stations (see Exhibit E-2).

Concerning Be-More's earlier comments with regard to Great Scott's proposed allotment of Channel 297A to Cheriton, Virginia, we are providing an allocation map (Exhibit E-3) and tabulation (Table II). Exhibit E-3 and Table II confirmed our previous statement that Channel 297A can be allotted to Cheriton, Virginia, in full compliance with the Commission's minimum distance separation requirements. The geographic coordinates for the reference site are located approximately 8 km north of Cheriton to meet the minimum separation requirements of first-adjacent channel proposal of station WKHI(FM), Channel 298B1, Fruitland, Maryland, and second-adjacent channel station WAFX(FM), Channel 295C, Suffolk, Virginia. Exhibit E-3 also shows the predicted City Grade (3.16 mV/m) contour for the proposed channel 297A operation which serves the entire community of Cheriton, Virgina. A new FM station on Channel 297A at Cheriton, Virginia would serve 14, 735 people and 677 square km area based on maximum Class A facilities.

In conclusion, the proposal of Great Scott is in the public interest since it would result in (1) a first local transmission service for Fruitland, a much larger community than Cheriton; (2) a second nighttime aural service to more than 600 people; and (3) a net gain in FM service to more than 62,000 people and 1,200 square km area compared to Be-More's Channel 291B proposal which would result in a net loss of FM service of 19,133 people and 615 square km area.

TABLE I
TABULATION OF
BE-MORE'S PROPOSED REALLOTMENT
OF CHANNEL 291B FROM EXMORE TO CHERITON, VIRGINIA
OCTOBER 2000

Channel	Location	Population	Area sq.km
291B	Exmore, VA	70,880	2,338
291B	Cheriton, VA	51,747	1,723

	Gain		Loss	
Relationship Comparison	Population	Area	Population	Area
Cheriton B/Exmore B	1,001	22	20,134	637

COHEN, DIPPELL AND EVERIST, P. C.

TABLE II
FM ALLOCATION SITUATION
FOR THE POTENTIAL ALLOTMENT OF
CHANNEL 297A FOR CHERITON, VIRGINIA
OCTOBER 2000

Channel	Call	City/State	Geographic Coordinates NAD-27	Separation Actual km	Separation Required km
297A	Ref. Site	Cheriton, VA	37°20'38" 75°55'14"	–	--
295C	WAFX	Suffolk, VA	36°48'16" 76°45'17"	95.3	95
	None within 150 km			–	72
297A	WBBT-FM	Powhatan, VA	37°30'15" 77°42'14"	158.9	115
298B	WKHI[1]	Exmore, VA	37°42'01" 75°41'36"	44.4	113
298B1	ADD	Fruitland, MD	38°11'32" 75°41'58"	96.2	96
299A	WSVY-FM	Windsor, VA	36°48'32" 76°30'13"	78.8	31
300A	WPTG	West Point, VA	37°27'02" 76°48'48"	79.9	31
243B	None within 45 km			–	15
244B	None within 45 km			–	15

[1]CH.298B1 PROPOSED FOR FRUITLAND, MD.

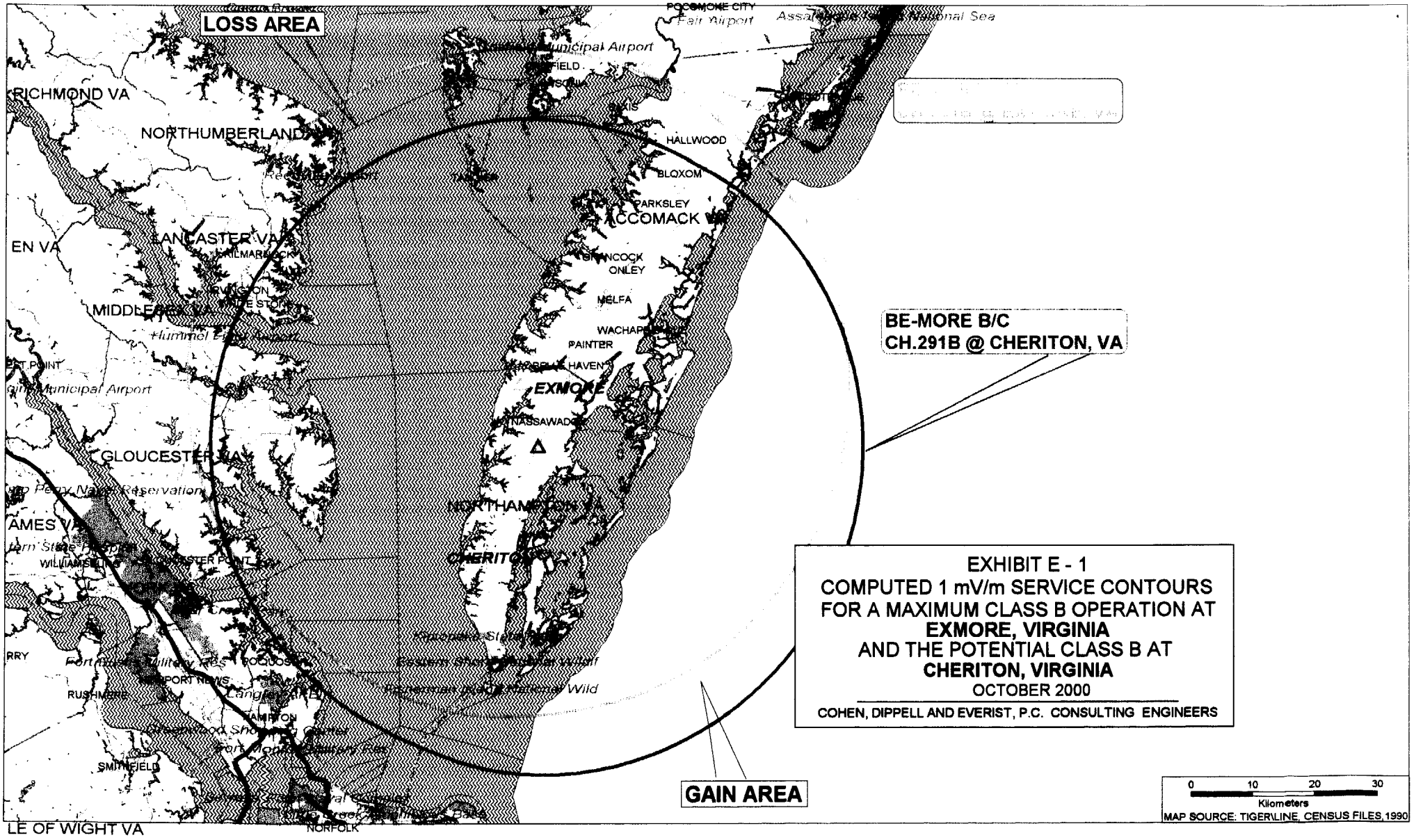

EXHIBIT E - 1
COMPUTED 1 mV/m SERVICE CONTOURS
FOR A MAXIMUM CLASS B OPERATION AT
EXMORE, VIRGINIA
AND THE POTENTIAL CLASS B AT
CHERITON, VIRGINIA
OCTOBER 2000

COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS

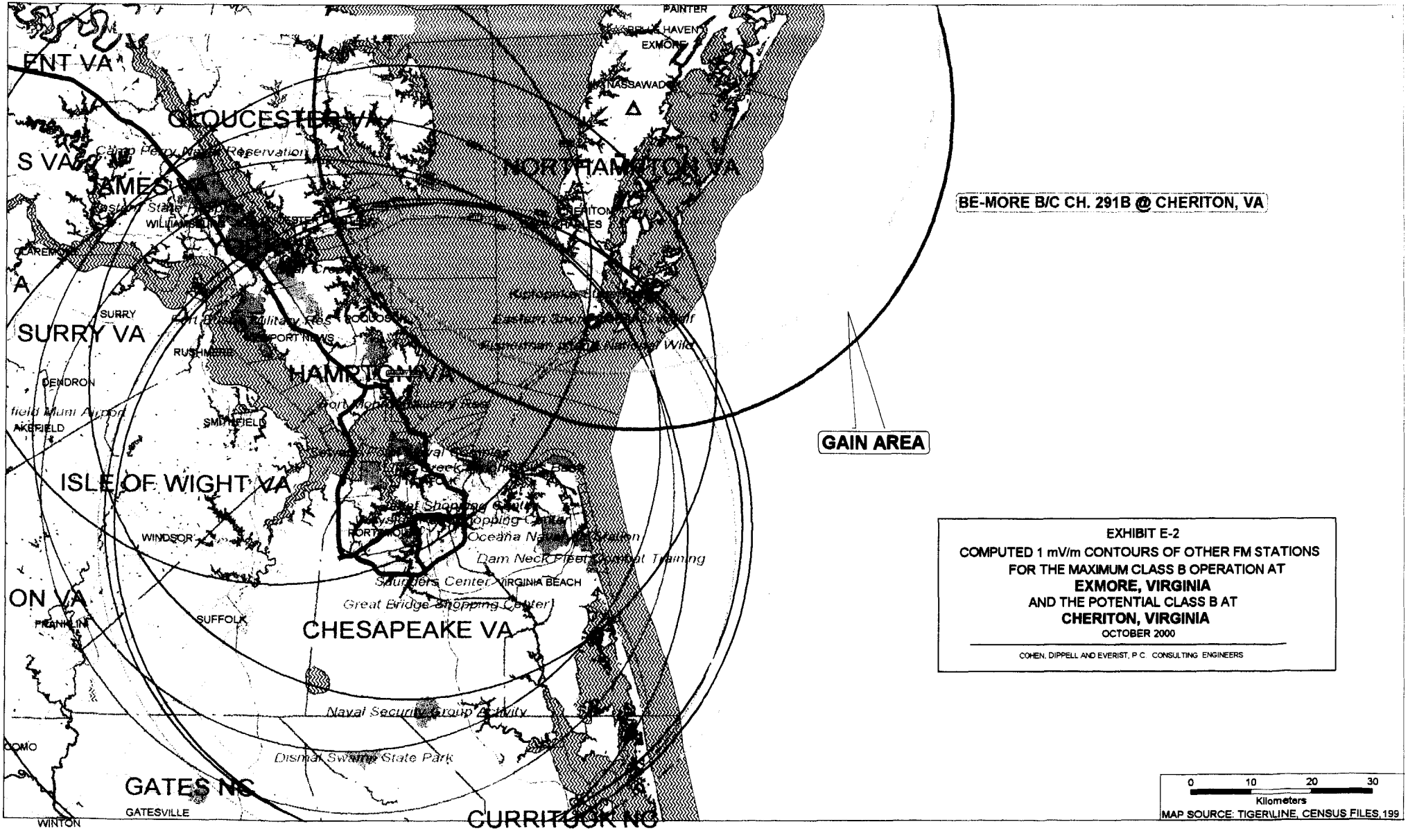

EXHIBIT E-2
COMPUTED 1 mV/m CONTOURS OF OTHER FM STATIONS
FOR THE MAXIMUM CLASS B OPERATION AT
EXMORE, VIRGINIA
AND THE POTENTIAL CLASS B AT
CHERITON, VIRGINIA
OCTOBER 2000

COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS

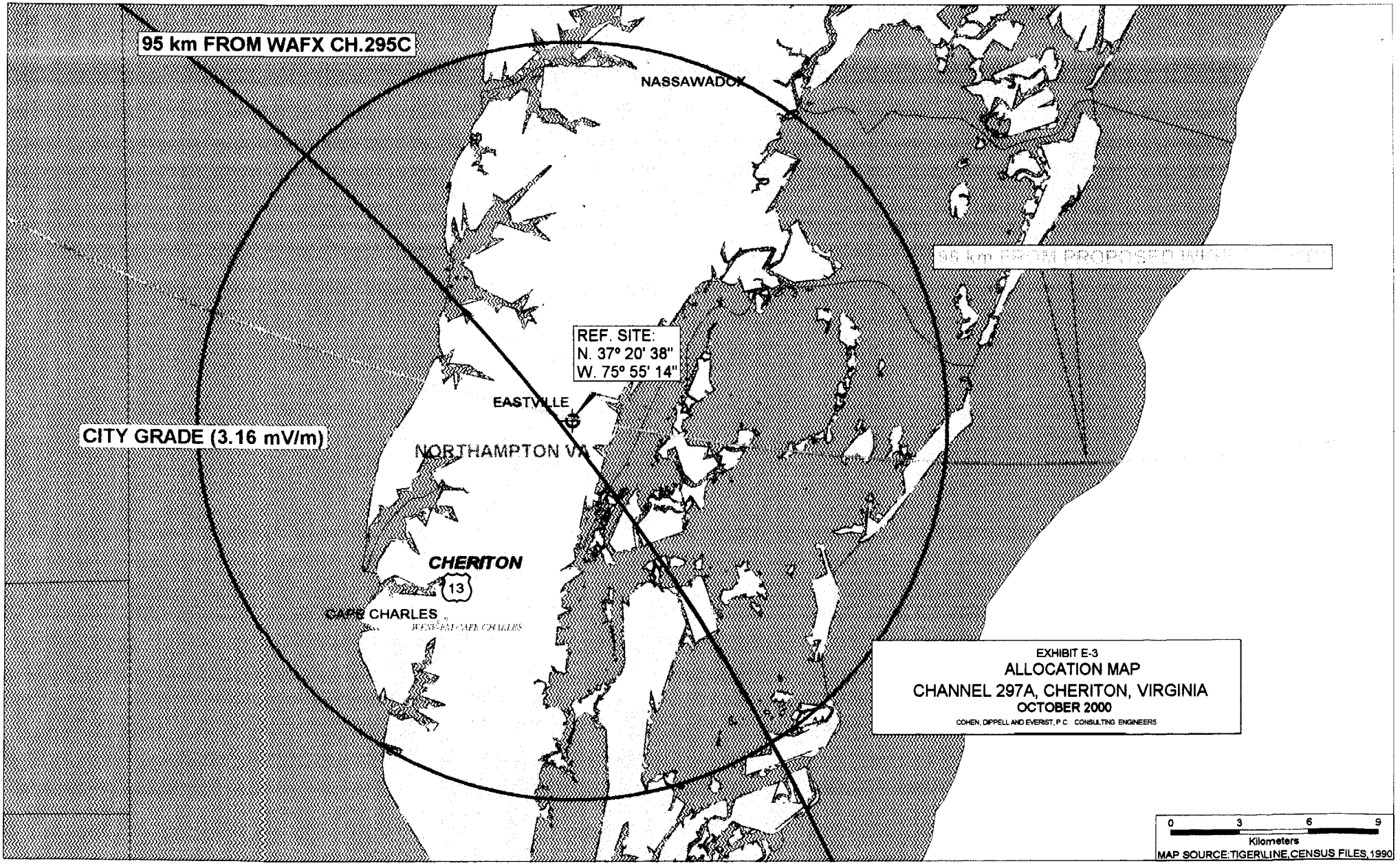

EXHIBIT E-3
ALLOCATION MAP
CHANNEL 297A, CHERITON, VIRGINIA
OCTOBER 2000
COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS

CERTIFICATE OF SERVICE

I, Yaiza E. Garabito, do hereby certify that copies of the foregoing *Reply Comments of Great Scott Broadcasting to Counterproposal* have been mailed by first-class mail, postage prepaid, this 5th day of October, 2000 to the following:

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