

Lakeway students attend public schools in the Lake Travis Independent School District. Although the District primarily draws from nearby Bee Cave and various unincorporated areas around Lakeway, four of the district's six schools are located in the 78734 zip code, including two of its three elementary schools and its only high school. The district's most recent annual budget exceeded \$27 million. It is operated by a superintendent and a seven-member elected school board. In addition, the Lake Travis Education Foundation, a non-profit volunteer organization, raises money to support the students and teachers of the Lake Travis ISD.

#### **I. Station KAJA, San Antonio, Texas**

42. In order to reallocate KWTX to Lakeway on Channel 247C1, Station KAJA, San Antonio, Texas must change channel from 247C to 245C1 and relocate its transmitter to a new site. The accompanying channel study (Figures 42 and 43) demonstrates that Channel 245C1 can be allotted to San Antonio at a new transmitter site in compliance with the Commission's spacing rules provided that an additional substitution is made at Georgetown, Texas as described below. Clear Channel Broadcast Licenses, Inc., the licensee of KAJA, is one of the Joint Parties. Clear Channel hereby states that it will file an application for Channel 245C1 in compliance with the Commission's spacing rules should the Commission approve the changes.

#### **J. Station KHFI, Georgetown/Lago Vista, Texas**

43. In order to effectuate the changes at Waco/Lakeway and San Antonio, Station KHFI, Georgetown, Texas must change channel and downgrade from Channel 244C1 to 243C2, and change its community of license to Lago Vista, Texas. The accompanying Channel Study (Figures 46 and 47) demonstrates that these changes can be made in compliance with the Commission's spacing rules provided that additional substitutions are made at Ingram, Llano and Nolanville, Texas as described below. Clear Channel Broadcast Licenses, Inc., the licensee of KHFI, is one of the Joint Parties.

Clear Channel hereby states that it will file an application for Channel 243C2 at Lago Vista in compliance with the Commission's spacing rules should the Commission approve the changes.

44. The changes at Georgetown/Lago Vista require that Channel 256A be substituted for the vacant Channel 243A allotment at Ingram, Texas. This substitution can be made consistent with the Commission's spacing rules, and requires no other changes to the Table of Allotments. See Figure 61. In addition, the allotment of Channel 243C2 at Lago Vista is short-spaced to a proposal advanced in MM Docket No. 99-358 by Evant Radio Company to allot Channel 243A to Evant, Texas. However, Evant Radio Company is withdrawing its Evant proposal simultaneously with the filing of the instant Counterproposal. Consistent with Section 1.420(j), the Joint Parties hereby reiterate that they have no agreement and have not paid or promised to pay any consideration to Evant Radio Company in exchange for the withdrawal of its proposal or expression of interest.

45. The allotment of Channel 243C2 at Lago Vista complies with the Commission's rules for a change in community of license. Channel 243C2 at Lago Vista is mutually exclusive with Channel 244C1 at Georgetown, as Figure 49 demonstrates. Georgetown will continue to receive adequate aural service from 19 stations. See Figures 49-50. Lago Vista (pop. 2,199) will obtain a first local service (priority 3) while Georgetown (pop. 14,842) will retain local service from KAHK(FM) (priority 4). See Revision of FM Assignment Policies and Procedures, *supra*. The change in site and downgrade in class will result in a net loss of coverage to 147,654 persons in an area of 7,854 sq. km.. See Figure 48.

46. From Lago Vista, Channel 243C2 will place a 70 dBu contour over much of the Austin, Texas urbanized area. However, this relocation does not implicate the Commission's policy against the migration of stations from rural areas to urban areas. Indeed, if anything, the opposite is true. From its current location, KHFI places a 70 dBu contour over all of the Austin, Texas

urbanized area. The Joint Parties propose to downgrade the station and relocate it away from the city center. Nevertheless, should the Commission require it, a Tuck showing can be made in this case, demonstrating that Lago Vista should be awarded a first local service preference.

47. Lago Vista's population is 0.5% of that of Austin. See Ada, Newcastle and Watonga, Oklahoma 11 FCC Rcd 16896 (1996) (new city is 0.9% of the population of the central city); Scotland Neck and Pinetops, North Carolina, 10 FCC Rcd 11066 (1995) (3.1% of the central city). In any event, the Commission has repeatedly stated that these factors are less important than evidence of independence. See e.g., Headland, Alabama and Chattahoochee, Florida, 10 FCC Rcd 10352 (1995).

48. The eight factors discussed below demonstrate Lago Vista's independence from Austin. Sources for this information are provided in Exhibit 5.

- (1) *There are Sufficient Employment Opportunities in Lago Vista for its Residents, and a Substantial Percentage of Lago Vista Residents Work in Lago Vista.*

There are a sufficient number of businesses located in Lago Vista that residents of the city need not go to Austin for employment. These employers include the Boaz Financial Group, Christopher Travels, Compass Bank, Gila Construction, The Island on Lake Travis, Lago Vista Marine, Micro n'More, Inc., Showtime Performance Boats, and Vista Video. Lago Vista has an active Chamber of Commerce.

Moreover, according to the last available census data, of the roughly 942 working Lago Vista residents over the age of sixteen, 38.0% (358) worked in Lago Vista. The Commission has found that much smaller percentages of residents working in the specified community have satisfied this *Tuck* criterion. See Coolidge and Gilbert, Arizona, 11 FCC Rcd. 3610 (1996) (finding that 13% of persons working in their place of residence satisfied this *Tuck* criterion). Moreover, of

the 584 residents who work outside of the town, only 353, or 37.5% of the town's workers, worked in the Austin MSA. The remaining 24.5% of Lago Vista's workers held jobs located either outside of the Austin MSA, or inside of the Austin MSA, but outside of Austin.

(2) *Lago Vista is Served by a Local Newspaper.*

The *North Lake Travis Log* publishes every Thursday, and has been in existence for over 18 years. Although it is distributed in communities throughout the North Lake Travis area, a substantial amount of the paper's coverage is dedicated to the city of Lago Vista. For example, the paper recently printed an editorial written by the Mayor of Lago Vista, Dennis Jones, in which he discussed the city council's work on the FY 2001 city budget. The paper also covered the Council's ultimate passage of that budget. None of the other communities served by the *Log* received similar coverage. Both the print version of the *Log*, as well as the *Log's* Internet site (<[www.zwire.com/site/news.cfmbrd=1553](http://www.zwire.com/site/news.cfmbrd=1553)>), provide news and sports stories of interest to Lago Vista residents. The *Log's* Web site carries comprehensive listings of area meetings and events, and local classified advertisements.

(3) *Lago Vista Residents Consider Their Community to be Separate from Austin.*

Lago Vista has well-established identity that is separate from that of Austin. The city has its own government, allows residents the opportunity to participate in matters of local concern. Lago Vista has a unique history. The area that is now Lago Vista was previously the Infamous Bar-K Ranch Resort, which flourished during the 1950's and '60s. The present-day city was developed as a planned community, and incorporated in the early 1980s. Moreover, the businesses and commercial opportunities available in Lago Vista, and the fact that Lago Vista provides many of its own municipal services, all suggest that the Lago Vista citizens view their city as a separate entity that could survive on its own if Austin did not exist.

(4) *Lago Vista Has its Own Local Government and Elected Officials.*

The City of Lago Vista is governed by a Mayor and six City Council members and a city manager, who oversees the provision of police protection, water and sewage service, as well as the operations of the Lago Vista municipal court. The city levies a real estate and sales tax. It has four full-time employees and one part-time employee. Lago Vista citizens may also participate in municipal affairs through city's Planning and Development Commission.

(5) *Lago Vista has its Own Zip Code*

The following zip code is associated with Lago Vista: 78645.

(6) *Lago Vista has Numerous Commercial Establishments, and is Not Dependent on Austin for Medical Care*

Lago Vista is the home of dozens of commercial establishments, including a number that identify with the community by using "Lago Vista" in their name: Lago Vista Chiropractic; Lago Vista Golf & Resort, Lago Vista Business Services, Inc., Lago Vista Rentals, and Lago Vista Real Estate, Inc. Lago Vista residents can obtain basic medical care from the two doctors and two dentists that practice in the city. Lago Vista has its own municipal airport, and its own library.

(7) *Businesses Can Advertise to Lago Vista Residents Directly and Need Not Use Media from the Austin Market.*

Business interested in reaching the residents of Lago Vista may do so through the *North Lake Travis Log* newspaper in either the print or online versions.

(8) *Lago Vista Provides its Own Municipal Services; It Does Not Receive them from Austin.*

The city of Lago Vista, and not Austin, provides municipal services to Lago Vista's residents. Lago Vista has its own police department, water and sewer services, and its own Municipal Court.

There are seven churches within the Lago Vista town limits, including the Good Shepherd Lutheran Church and the Rolling Hills Community Church. Seven hundred eight students attend either the elementary school, junior high, or high school in the Lago Vista Independent School District. The district has been in existence since 1975, and its most recent annual budget exceeded \$23 million. It is operated by a superintendent and an six-member elected school board.

#### **K. Station KBAE, Llano, Texas**

49. In order to make the changes at Georgetown/Lakeway, Channel 297A must be substituted for 242A at Llano, Texas at a new transmitter site. The accompanying Channel Study demonstrates that Channel 297A can be allotted to Llano in compliance with the Commission's spacing rules provided a substitution is made at Nolanville, Texas as described below. See Figures 50-51. Munbilla Broadcasting Corp. holds a construction permit for Station KBAE on Channel 242A at Llano. The permittee has provided a statement consenting to the proposed channel and transmitter site change. See Exhibit 1. Rawhide hereby states that it will reimburse the permittee for its reasonable expenses in changing channels and transmitter site.

50. At the new transmitter site, there will be a net loss in population of 12,962 persons in an area of 496 sq. km. See Figure 53.

#### **L. Station KLFX, Nolanville, Texas**

51. In order to change channels at Llano, Channel 249A must be substituted for Channel 297A for Station KLFX at Nolanville, Texas. The channel substitution may be made at the current transmitter site of KLFX, as Figure 54 demonstrates, provided that one additional change is made at McQueeney, Texas as described below. The Joint Parties again state that they will reimburse the licensee of KLFX for its reasonable costs in changing its channel in accordance with Circleville,

Ohio. The Joint Parties urge the Commission to issue an Order to Show Cause to Station KLFX in order to effectuate the proposed channel substitution.

#### **M. Station KVCQ, McQueeney/Converse, Texas**

52. The channel change at Nolanville requires that Channel 249C1, currently allotted to McQueeney, Texas for Station KVCQ, be relocated to a new transmitter site and change its community of license to Converse, Texas. The accompanying Channel Study demonstrates that Channel 249C1 can be allotted to Converse in compliance with the Commission's spacing rules. See Figures 55-56. No changes other than those discussed above are necessary for this reallocation. Rawhide, a Joint Party, is the licensee of KVCQ. Rawhide hereby states that it will file an application for Channel 249C1 at Converse should the Commission grant the changes. A gain/loss study is provided in Figure 57.

53. The allotment of Channel 249C1 at Converse complies with the Commission's rules for a change in community of license. The use of Channel 249C1 at Converse is mutually exclusive with its use at McQueeney, as Figure 55 demonstrates. McQueeney will continue to receive adequate aural service from 24 stations. See Figures 58-59. Neither McQueeney nor Converse currently has local service. (KVCQ, although allotted to McQueeney, currently operates from its previously allotted Channel 249C3 at Cuero, Texas. If the Commission grants this proposal, Rawhide does not intend to commence broadcast operations at McQueeney.<sup>7</sup>) Therefore, each community receives priority 3 as a first local service, but since Converse (pop. 8,887) is larger than

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7. While not required under Commission policy, in the event the Commission requires service to remain at McQueeney, KVCQ could be allotted to McQueeney instead of Converse. See Figures 60a - 60d.

McQueeney (pop. 2,063) Converse is preferred under the Commission's allotment priorities. See Revision of FM Assignment Policies and Procedures, supra.

54. Converse is a community deserving of its own local radio station. Converse is within the San Antonio, Texas urbanized area, which implicates the Commission's policy against the migration of stations from underserved rural areas to well-served urban areas. However, in this case there is ample evidence of the independence of Converse from San Antonio, and the Tuck criteria are clearly met.

55. Converse's population is 0.9% of that of San Antonio. See Ada, Newcastle and Watonga, Oklahoma 11 FCC Rcd 16896 (1996) (new city is 0.9% of the population of the central city); Scotland Neck and Pinetops, North Carolina, 10 FCC Rcd 11066 (1995) (3.1% of the central city). However, as discussed above, these factors are less important than evidence of independence. See e.g., Headland, Alabama and Chattahoochee, Florida, 10 FCC Rcd 10352 (1995).

56. The relocation of KVCQ from McQueeney to Converse will result in an increase in population served of 11,261,462 persons and a loss in signal coverage area of 40 sq. km. within the respective 60 dBu contours. See Figure 57. This relocation will create a small gray area within the loss area. See Figures 58-59. However, as part of this Counterproposal, the Joint Parties propose the allotment of Channel 232A to Flatonia, Texas, as that community's first local service. See ¶¶ 58-61, *infra*. Rawhide will file an application to build a new station at Flatonia if the allotment is approved. The new allotment to Flatonia will provide a second aural service to the entire grey area.<sup>8</sup>

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8. Should the Commission determine that the reallocation of Channel 249C1 from McQueeney to Converse does not create a grey area or require a replacement service, then Rawhide withdraws its expression of interest in applying for the new allotment at Flatonia.

57. The eight factors discussed below demonstrate Converse's independence from San Antonio. Sources for this information are provided in Exhibit 6.

- (1) *There are Sufficient Employment Opportunities in the Converse for its Residents, and a Substantial Percentage of Converse Residents Work in Converse.*

Converse is home to dozens of businesses, and residents of the city need not go to San Antonio for employment. These businesses include AAA Bathtub Refinishing, Inc., Bug Free Pest Control Service, Chism Trail Antiques, Diamond Shamrock Corp., F & M Medical Supply, Northeast Janitorial Service, RR Truck Sales & Service, Star Custom Cabinets, and a Walgreens Drug Store.

Moreover, according to the last available census data, of the roughly 4552 working Converse residents over the age of sixteen, 11.6% (529) worked in Converse. Of the 4023 residents who worked outside of Converse, 2864, or 62.9 % of the town's workers, worked in San Antonio. The remaining 25.5% of Converse's workers held jobs located either outside of the San Antonio MSA, or inside of the San Antonio MSA, but outside of San Antonio. Converse businesses may join the Randolph Metrocom Chamber of Commerce, which promotes the industrial and commercial interests of communities, including Converse, that surround Randolph Air Force Base.

- (2) *Converse is Served by a Local Newspaper.*

The *Metrocom Herald* is published weekly and serves Converse and several surrounding communities. Both the print version of the *Herald*, as well as the *Herald's* Internet site (<[www.primetimenewspapers.com/herald/hercvr.htm](http://www.primetimenewspapers.com/herald/hercvr.htm)>), offer news and sports stories of interest to Converse residents. The paper provides a substantial amount of coverage to the city of Converse. For example, the *Herald* regularly covers the Converse City Council, as indicated by a recent story on a proposal before the Council to house stray animals found in Converse at the facilities of the nearby town of Live Oak. The

*Herald* also recently ran a feature on the extension of an existing bus route to include south Converse. The *Herald's* Web site also carries comprehensive weekly listings of meetings and events and a crime blotter for Converse and its other communities.

(3) *Converse Residents Consider Their Community to be Separate from San Antonio.*

Converse has a well-established identity and a distinct history that distinguishes it from San Antonio. As explained below, Converse has its own government, which allows residents the opportunity to participate in matters of local concern. There are also a wide range of businesses and commercial opportunities available in Converse. These factors, in combination, suggest that residents of the city view their community as a separate entity from San Antonio, one that could survive on its own if San Antonio did not exist.

(4) *Converse Has its Own Local Government and Elected Officials.*

The City of Converse is governed by a Mayor and six City Council members, who oversee provision of police and fire protection, water and sewer services, as well as the operations of the Converse municipal court. The city's operations are overseen on a day-to-day basis by a city manager. Converse citizens may also participate in municipal affairs through the Converse Parks and Recreation Commission, the Building and Standards Commission, the Street Commission, the Planning Commission, and the Zoning Commission. The Converse City Council has independent taxing authority.

(5) *Converse has its Own Zip Code*

The U.S. Postal Service associates the following zip code with Converse: 78109.

(6) *Converse has Numerous Commercial Establishments, and is Not Dependent on San Antonio for Medical Care*

As mentioned above, Converse is the home of dozens of commercial establishments. A number of these businesses identify with their community by using "Converse" in their name, including:

Converse AC & Heating, Converse Mini Storage, Converse Beauty Shop, Converse Chiropractic Center, and Converse Painting.

Although Converse has no hospital of its own, it does have several general practitioners and dentists, a vision care provider, and two chiropractors, to provide basic medical care to Converse residents.

Converse has its own library, which was created through the combined efforts of the Converse Lions' Club, the Converse Grange, and other volunteers.

- (7) *Businesses Can Advertise to Converse Residents Directly and Need Not Use Media from the San Antonio Market.*

Business interested in reaching the residents of Converse may do so through the *Metrocom Herald* newspaper.

- (8) *Converse Provides its Own Municipal Services; It Does Not Receive them from San Antonio*

The city of Converse, and not San Antonio, provides municipal services to Converse's residents. As noted above, Converse levies its own property taxes, has its own police and fire departments, oversees its own garbage collection, water and sewer services, and municipal Court. The Converse Police Department employs twenty-three officers, two civilians and one K-9 unit. The Converse Fire & EMS Department has nine paid personnel and between fifteen and twenty-five volunteers. The Department is fully equipped, with three major class-A pumpers, three ambulances, one rescue vehicle and one brush truck. All of the full-time personnel are cross-trained in both fire and emergency medical services, as are most of the volunteers.

There are ten churches in Converse of various denominations.

Converse students attend public schools in the Judson Independent School District. Although the school district also draws students from other communities around Converse, a number of its schools, including its only high school, senior high school, and adult and community education center, are located

in Converse itself. The school district's most recent annual budget exceeded \$103 million. It is operated by a superintendent and a seven-member elected Board of Trustees.

#### **N. Flatonia, Texas**

58. The channel study attached as Appendix A to Exhibit E shows that Channel 232A can be allotted to Flatonia, Texas at coordinates 29° 37' 00" North Latitude, 97° 12' 44" West Longitude in compliance with the Commission's spacing rules. Appendix B demonstrated that the station will place a 70 dBu signal over the entire community of license.

59. Flatonia, Texas fully satisfies the FCC definition of "community" for allotment purposes. The town had 1,295 residents as of the 1990 Census. It is not part of any urbanized area. According to the staff at the Flatonia City Hall, the town is governed by its own elected mayor, five city council members, and a city manager. It provides its own fire and police protection, and its own water and wastewater service. The city also retails electricity, and contracts out for garbage collection. Residents can obtain local news from the weekly *Flatonia Argus*, as well as an Internet-based "newspaper," the *Flatonia News*. The city's Chamber of Commerce also operates a web site, <[www.flatonia-tx.com](http://www.flatonia-tx.com)>, that contains a substantial amount of information about local events and attractions. The city's approximately 600 public school students attend Flatonia Public Schools, which operates an elementary school, a middle school, and a high school. The city has its own library, and zip code (78941). Medical services are available to Flatonia residents at the city's medical clinic, eye doctor, and veterinary clinic. There are three churches in the town. See Exhibit 7.

60. There are dozens of small businesses and organizations located in Flatonia, including several that identify with the city by including "Flatonia" in their names, including the Flatonia Veterinary Clinic, the Flatonia Food Mart, the Flatonia Baptist Church, the Flatonia Livestock Commission, and the Flatonia

Community Clinic. The city's major employers include Cal-Maine Foods, the Flatonia Independent School District, Prototype (a machining company), the Oak Manor Nursing Center, and Central Texas Bank. See Exhibit 7.

61. The calendar of events maintained by the Flatonia Chamber of Commerce shows that there are a number of events that give the town an identity of its own, highlighted by Czilispiel XXVII, the 28th annual chili cook-off originated by the town's Czech immigrants. Other events include Flatonia Market Days in April and September, the 4-H and FFA Livestock Show, the Sacred Heart Catholic Church Picnic and Fall Festival, and the Christmas in Flatonia Candlelight Homes Tour. See Exhibit 7.

#### **IV. KLAKE ALTERNATIVE PROPOSAL**

62. The Joint Parties urge the Commission to adopt the above proposal in its entirety. The proposal offers first local service to five new communities and a substantial increase in population and coverage area. However, in the unlikely event that the Commission finds a defect in some portion of the proposal, it can be severed into two separate proposals, either one of which can be granted independently. The first of these groups incorporates, all of the changes discussed in Sections III.A through III.G, together with two additional changes discussed below, to form an independent proposal (the "KLAKE Alternative") that can be granted on its own merits. The following table lists all of the changes to the FM Table of Allotments required by the KLAKE Alternative:

<u>Community</u>	<u>Channels</u>	
	<u>Present</u>	<u>Proposed</u>
Ardmore, Oklahoma	239C1	-----
Durant, Oklahoma	248C2	-----
Elk City, Oklahoma	232C3	233C3
Healdton, Oklahoma	249C3	239C1
Lawton, Oklahoma	231C2	232C2
Purcell, Oklahoma	-----	249A
Archer City, Texas	248C1	230C1
Keller, Texas	-----	248C
Knox City, Texas	297A	257A
Marlin, Texas	225C2	248C2
Seymour, Texas	230C2, 222C2	222C2, 298C2
Waco, Texas	248C	225C2
Wellington, Texas	298C3	296C3

63. With the exception of the changes at Waco and Marlin, Texas, each of these changes has been discussed above. The Waco and Marlin changes are discussed below. The KLAKE Alternative would provide two first local services to Keller, Texas and Purcell, Oklahoma. In addition, it would provide an overall net gain in area of 3,736 sq. km. and population of 2,467,393 persons within the 60 dBu contours. See Engineering Statement at Exhibit E, Appendix C.

**A. Station KWTX, Waco, Texas**

64. In order to allot Channel 248C to Keller, Texas, Channel 248C must be deleted at Waco, Texas. Instead of substituting Channel 247C1 at Lakeway, Texas, as discussed above, Channel 225C2 can be allotted to Waco at a new transmitter site in compliance with the Commission's spacing rules, provided an additional substitution is made at Marlin, Texas. See Figures 30-31. Capstar (one of the Joint Parties), the licensee of KWTX, hereby states that it will file an application for Channel 225C2 consistent with the Commission's spacing rules if the Commission cannot grant the complete proposal described above but can grant the KLAKE Proposal. A gain/loss study is provided in Figure 32.

**B. Station KLRK, Marlin, Texas**

65. In order to allot Channel 225C2 at Waco, Texas, Channel 248C2 must be substituted for Channel 225C2 at Marlin, Texas for Station KLRK. Channel 248C2 can be allotted to Marlin at a new transmitter site consistent with the Commission’s distance separation rules. See Figures 35-35a. The KLRK licensee has provided a consent statement in which it agrees to change to Channel 248C2 at a new transmitter site. FBC will reimburse the licensee for the changes pursuant to an agreement between the parties. At the new site, the proposal would increase the net coverage area by 48 sq. km. and increase the net 60 dBu population served by 23,504 person. See Figure 36.

**V. KVCQ ALTERNATIVE PROPOSAL**

66. Should there be a defect in Section III.A - III.G of the Counterproposal, the second alternative proposal would involve only the changes discussed in Sections III.H through III.M (the “KVCQ Alternative”). The KVCQ Alternative can likewise be granted on its own merits. The following table lists all of the changes to the FM Table of Allotments required by the KVCQ Alternative:

<u>Community</u>	<u>Channels</u>	
	<u>Present</u>	<u>Proposed</u>
Converse, Texas	-----	249C1
Flatonia, Texas	-----	232A
Georgetown, Texas	244C1	-----
Ingram, Texas	243A	256A
Lakeway, Texas	-----	247C1
Lago Vista, Texas	-----	243C2
Llano, Texas	242A	297A
McQueeney, Texas	249C1	-----
Nolanville, Texas	297A	249A
San Antonio, Texas	247C	245C1
Waco, Texas	248C	-----

67. As demonstrated in the Engineering Statement, Figures 37-61, none of these changes depend upon the other portion of the complete proposal discussed above. If necessary, the Commission could accept and act upon the KVCQ Alternative in this proceeding since it has been advanced as a part of the complete

proposal which conflicts with the Quanah petition. The KVCQ Alternative would provide first local service to three communities: Lakeway, Lago Vista, and Converse, Texas. In addition, it would provide an overall net gain in population of 1,605,961 persons within the 60 dBu contours. See Engineering Statement at Figure 62.

## **VI. CONCLUSION**

68. The proposal advanced by the Joint Parties offers significant public interest benefits. The communities of Keller, Purcell, Lakeway, Lago Vista, and Converse will each receive a first local service while the current communities of Durant, Ardmore, Waco, Georgetown, and McQueeney will remain well served. There will be a substantial net increase in population and area. See Figure 62. All parties have consented to their respective changes except the licensees at Archer City and Nolanville but no opposition

is expected from those licensees. Two Orders to Show Cause will be necessary. Quanah, Texas can also obtain a new service on an alternate channel. Accordingly, the Joint Parties urge the Commission to grant this proposal.

Respectfully submitted,

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