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Ron Meredith
P.O.Box 329
Clinton, TN. 37717

11/29/00

Office of the Secretary
Federal Communications Commission
445 12th Street, SW TW-A325
Washington, D.C. 20554

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NOV 30 2000

FCC MAIL ROOM

RE: Counterproposal
MM Docket # 00-195
RM-9973

Dear Secretary:

Enclosed please find an original and four copies of comments and counterproposal regarding MM Docket # 00-195; RM-9973. The information contained will demonstrate our opinion that channel 291a would be better allocated to Oliver Springs, TN.

Please note this counterproposal is supported by the original petitioner Clyde Scott, Jr., D.B.A. EME Communications.

Please send future notices regarding this matter to: Ron Meredith P.O.Box 329 Clinton, TN. 37717

Sincerely,

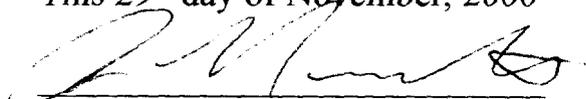


Ron Meredith

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been properly mailed to: Clyde Scott, Jr. D.B.A. EME Communications
293 JC Saunders Road
Moultrie, Georgia 31768

This 29th day of November, 2000


Ron Meredith

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FILING WITH FCC**

Prepared by:

Graham Brock, Inc.
Broadcast Technical Consultants
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St. Simons Island, GA 31522
912-638-8028
202-393-5133
Fax 912-638-7722

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Ron Meredith

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

COMMENTS AND COUNTERPROPOSAL

MM DOCKET #00-195

RON MEREDITH

NEW FM RADIO STATION

OLIVER SPRINGS, TENNESSEE

November 2000

TECHNICAL EXHIBIT

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COMMENTS AND COUNTERPROPOSAL
MM DOCKET #00-195
RON MEREDITH
NEW FM RADIO STATION
OLIVER SPRINGS, TENNESSEE
November 2000

1. This technical statement and attached exhibits were prepared on behalf of Ron Meredith ("Meredith"). These comments are being submitted in response to a Commission Public Notice, MM Docket # 00-195, in which the allotment of Channel 291A to Clinton, Tennessee, has been proposed. As an alternative to the Clinton, Tennessee, request, Meredith herein proposes Channel 291A be allotted as the second local audio service to Oliver Springs, Tennessee.

Oliver Springs, Tennessee, Proposal

2. Oliver Springs, Tennessee, is located at the juxtaposition of Anderson, Morgan and Roane Counties, Tennessee. Based on the 1990 Census, Oliver Springs has a population of 3,433 persons. Presently, there is one FM service licensed to Oliver Springs. The allotment of Channel 291A would provide second locally licensable service to the community of Oliver Springs.

3. Meredith, therefore, requests that Channel 291A be allotted to Oliver Springs, Tennessee, as that community's second local FM service at geographic coordinates North Latitude 36° 05' 35" and West Longitude 84° 22' 08". This reflects a site restriction of 5.6 kilometers north of the community to avoid shortspacing station WNGC, Channel 291C1, Toccoa, Georgia.¹ From this location, a maximum Class A facility will deliver a 3.16 mV/m

1) From this proposed location, Channel 291A is shortspaced to the proposed allotment of Channel 291A at Clinton, Tennessee.

contour over the community of Oliver Springs. Attached as Exhibit #1 is a usable area map depicting the area in which a transmitter site can be located for Channel 291A at Oliver Springs, Tennessee.² Attached as Exhibit #2 is a §73.207 spacing analysis showing that Channel 291A at Oliver Springs meets the Commission's minimum distance separation requirements to all licensed and applied for facilities.³

4. Therefore, Meredith proposes the following changes in the Commission's Table of FM Allotments, §73.202b of the rules:

Oliver Springs, Tennessee

Present

Proposed

254C3

254C3, 291A

Public Interest Aspects

5. The allotment of Channel 291A in Oliver Springs, Tennessee, will provide second locally licensable service to the community of Oliver Springs. The allotment of Channel 291A to Oliver Springs will provide 1.0 mV/m service to 372,769 persons in 3,113.4 square kilometers. When Channel 291A is allotted to Oliver Springs, Tennessee, and the filing window for the channel is announced, Meredith will submit, on a timely basis, an application or the appropriate expression of interest seeking authority to construct a new FM facility at Oliver Springs, Tennessee.

2) The map does not consider the Channel 291A proposal at Clinton, Tennessee.

3) With the exception of Channel 291A at Clinton, Tennessee.

6. This counterproposal is mutually exclusive with the proposal to allot Channel 291A to Clinton, Tennessee. However, Clinton is presently served by WDVX (FM), Channel 210C3; WYFC (FM), Channel 237A; and WYSH, 1380 kHz, all presently licensed to Clinton. The addition of Channel 291A to Clinton, Tennessee, would provide the fourth locally licensable service to the community.

7. The foregoing comments were prepared on behalf of Ron Meredith by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. The information contained in this application was extracted from the NTIA FM database as updated on November 27, 2000, and other sources. We assume no liability for errors or emissions in that database, which may be adverse to the request contained herein.

Graham Brock, Inc.

Broadcast Technical Consultants

290A - TAEHWEI

Lake City

WXVO

Norris

36-10-00 N
084-40-00 W

084-30-00 W

084-20-00 W

084-10-00 W

Morgan
Martburg

WOFE

USABLE AREA

Anderson

Clinch

WNGC

Oliver Springs

Powell

36-00-00 N

Oakdale

27

OLIVER SPRINGS

Oak Ridge

Karna

EXHIBIT #1
COMMENTS & COUNTERPROPOSAL
MM DOCKET #00-195
RON MEREDITH
NEW FM RADIO STATION
OLIVER SPRINGS, TENNESSEE
November 2000

Scale 1:250,000

0 3 6 9 km

Farragut

COMMENTS AND COUNTERPROPOSAL
MM DOCKET #00-195
RON MEREDITH
NEW FM RADIO STATION
OLIVER SPRINGS, TENNESSEE
November 2000

EXHIBIT #2

CLEARANCE STUDY FOR CHANNEL 291, OLIVER SPRINGS, TENNESSEE
 USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE			CLASS = A	DISPLAY DATES			
36 05 35 N			Current Spacings	DATA	11-27-00		
84 22 08 W			Channel 291 - 106.1 MHZ	SEARCH	11-28-00		
-----	Call	Channel	Location	Dist	Azi	FCC	Margin
-----	N. Lat.	W. Lng.	Power	HAAT			

WNGC	LIC 291C1	Toccoa	GA	200.96	161.1	200.0	0.96
34 22 41	83 39 30	ZC	100.000 kW		295 M		
	Southern B/casting Of Pensaco		BLH19990430KD		60810		
RADD	ADD 291C1	Sugar Hill	GA	200.96	161.1	200.0	0.96
34 22 41	83 39 30	D	0.000 kW		0 M		
			RM9263		0		
RADD	ADD 291C1	Lawrenceville	GA	200.96	161.1	200.0	0.96
34 22 41	83 39 30		0.000 kW		0 M		
			RM9263		0		
WNGC.A	APP 291C1	Toccoa	GA	201.03	161.1	200.0	1.03
34 22 40	83 39 25	CN	100.000 kW		299 M		
	Southern B/casting Of Pensaco		BPH20000911AAR		60810		
WXVO.C	CP 294A	Norris	TN	40.08	85.6	31.0	9.08
36 07 12	83 55 30	ZCN	1.100 kW		229 M		
	Newko General Partnership		BMPH20001011ABG		76263		
WOFEFM	LIC 289A	Rockwood	TN	40.16	231.0	31.0	9.16
35 51 55	84 42 54	CN	0.930 kW		255 M		
	P & G Properties Inc.		BLH19941028KC		51113		
AVAC	VAC 290A	Tazewell	TN	81.27	59.7	72.0	9.27
36 27 32	83 35 07	N	0.000 kW		0 M		
					96470		
WYFC	LIC 237A	Clinton	TN	31.36	94.1	10.0	21.36
36 04 21	84 01 18	CN	1.450 kW		204 M		
	Bible Broadcasting Network, I		BLED19980428KE		5153		
WRIL.C	CP 292A	Pineville	KY	94.40	38.7	72.0	22.40
36 45 15	83 42 23	CN	1.050 kW		234 M		
	Pine Hills Broadcasting, Inc.		BPH19950424IA		52625		
WANYFM	LIC 292A	Albany	KY	97.07	314.1	72.0	25.07
36 41 54	85 09 00	HN	2.700 kW		47 M		
	Albany Broadcasting Company		BLH7376		834		
WSKZ	LIC 293C	Chattanooga	TN	134.45	219.9	95.0	39.45
35 09 42	85 19 06	CN	100.000 kW		329 M		
	Citadel Broadcasting Company		BLH7303		54525		

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

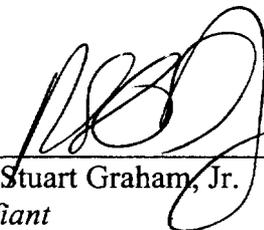
State of Georgia)
St. Simons Island) ss:
County of Glynn)

R. STUART GRAHAM, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Ron Meredith to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in Broadcast Engineering since 1972.

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

This the 28th day of November, 2000.



R. Stuart Graham, Jr.
Affiant

*Sworn to and subscribed before me
this the 28th day of November, 2000.*



Notary Public, State of Georgia
My Commission Expires: April 20, 2002