Mount urbanized area and Whitakers). More importantly, it is a separate and independent community. It is an incorporated community with a mayor and its own five-member town council. Although Whitakers does not have its own telephone book, it does have a separate section in the Rocky Mount telephone book. Whitakers does have its own zip code, 27891 (Rocky Mount's zip code is 27804). Whitakers has many businesses including: Whitakers Auto Supply, Whitakers Food Center, Whitakers Gin Company, Whitakers Medical Center, Whitakers Pharmacy, Whitakers Used Tires, Whitakers Food Center, Consolidated Diesel Co., Peaches and Cream, Watson Seed Farm, The May Apparel Group, Inc., Pierce's Garage, Pro Tech Racing & Repairs, Ricks Brothers Garage, Lisa D's Pizza & Grill, Quality Inn, Battle Grocery, Bruce Lewis Grocery, Cherry's Grocery, Journigan's Food Stores, Inc., K & B Grocery, Deluxe Inn, Florida Room Service, Quality Inn, Huie's Chimney Sweep, Mr. Chimney, Phillips Chimney Sweep, Whitehead's Chimney Sweep and Repair. Finally, Whitakers has its own police service, volunteer fire department, public library, post office and elementary school (Swift Creek Elementary). Perhaps most significantly, the coverage that would be achieved by the proposed Whitakers facility encompasses an

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the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries.

enormous number of people located outside the Rocky Mount urbanized area. As is explained in the attached Engineering Statement of R. Lee Wheeler, the proposed C3 facility at Whitakers would provide service to only 50,000 people in the Rocky Mount urbanized area, but would overall provide service to approximately 170,000 people, i.e., service to the Rocky Mount urbanized area would account for less than 30 percent of the coverage achieved by the proposed Whitakers facility.[10] In short, under a *Tuck* analysis, Whitakers is a community deserving of first local service.

2. MainQuad's Proposal Would Not Only Provide First Local Service to 109 More People than Would DRC's Counterproposal, it Also Would Provide Reception Service to 130,338 More People and Thus Would Better Serve the Public Interest

Even assuming that DRC's counterproposal is not technically deficient, as best as DRC can estimate, its counterproposal would provide 751 people with first local service. (DRC's Comments at 3.) and 41,688 people with reception service from Dinwiddie (Exhibit 4, MainQuad's Dinwiddie 60 dBu Engineering Study).

By contrast, MainQuad's proposal to substitute Channel 276C3 for Channel 276A at Alberta, reallot Channel 276C3 from Alberta to

[10] In fact, the number of people who would be served by the proposed Whitakers facility who do not reside in the Rocky Mount urbanized area is more than the populations that would be served by the proposed Garysburg and Dinwiddie facilities *combined*.

Whitakers and allot Channel 299A to Alberta would provide first local service to 860 people at Whitakers (MainQuad's Comments at 5). MainQuad's proposal would provide reception service reaching 172,026 people from Whitakers (MainQuad's Comments at Exhibit 1).

MainQuad's proposal would provide first local service to 109 more people and reception service to 130,338 more people than would DRC's counterproposal. Thus, even assuming that DRC's counterproposal should be considered, the conclusion is inescapable that MainQuad's proposal better serves the public interest.

IV. Conclusion

MainQuad's proposal represents a superior allocation of allotments and better serves the public interest as compared to Garysburg Radio's counterproposal because: (1) although both seek to provide first local service to a community, MainQuad's proposal would provide 113,860 more people with reception service; (2) the fact that Garysburg Radio's counterproposal would provide 197 more people with first local service is *de minimis* as compared to this reception gain; (3) contrary to Garysburg Radio's assertion, MainQuad's proposal would not deprive Alberta of its only existing local broadcast service, but rather, Alberta would retain its

first local service through the allotment of Channel 299A in accordance with the Commission's decision in *Llano*.

MainQuad's proposal represents a superior allocation of allotments than does DRC's counterproposal because: (1) DRC's proposal is technically deficient and should be rejected without further consideration; (2) assuming, *arguendo*, it is not deficient, MainQuad's proposal would provide first local service to 109 more people and reception service to 128,760 more people; (3) contrary to DRC's assertions, MainQuad's proposal would not constitute a move from a rural community to an urban community, even using DRC's alleged ideal coordinates; and (4) assuming, *arguendo*, that MainQuad's proposal would constitute such a move, requiring a *Tuck* analysis, that analysis demonstrates that Whitakers is an independent community deserving of first local service.

Accordingly, the MainQuad proposal, representing as it does a superior arrangement of FM allotments, is to be preferred and, as a result, the proposed rule making should be adopted.

Respectfully submitted,

MainQuad Broadcasting, Inc.

By: _____
John M. Pelkey
Michael I. Goulding
Its Attorneys

GARVEY, SCHUBERT & BARER
5th Floor, 1000 Potomac Street, N.W.
Washington, DC 20007

202/965-7880

Date: February 13, 2001

EXHIBIT 1

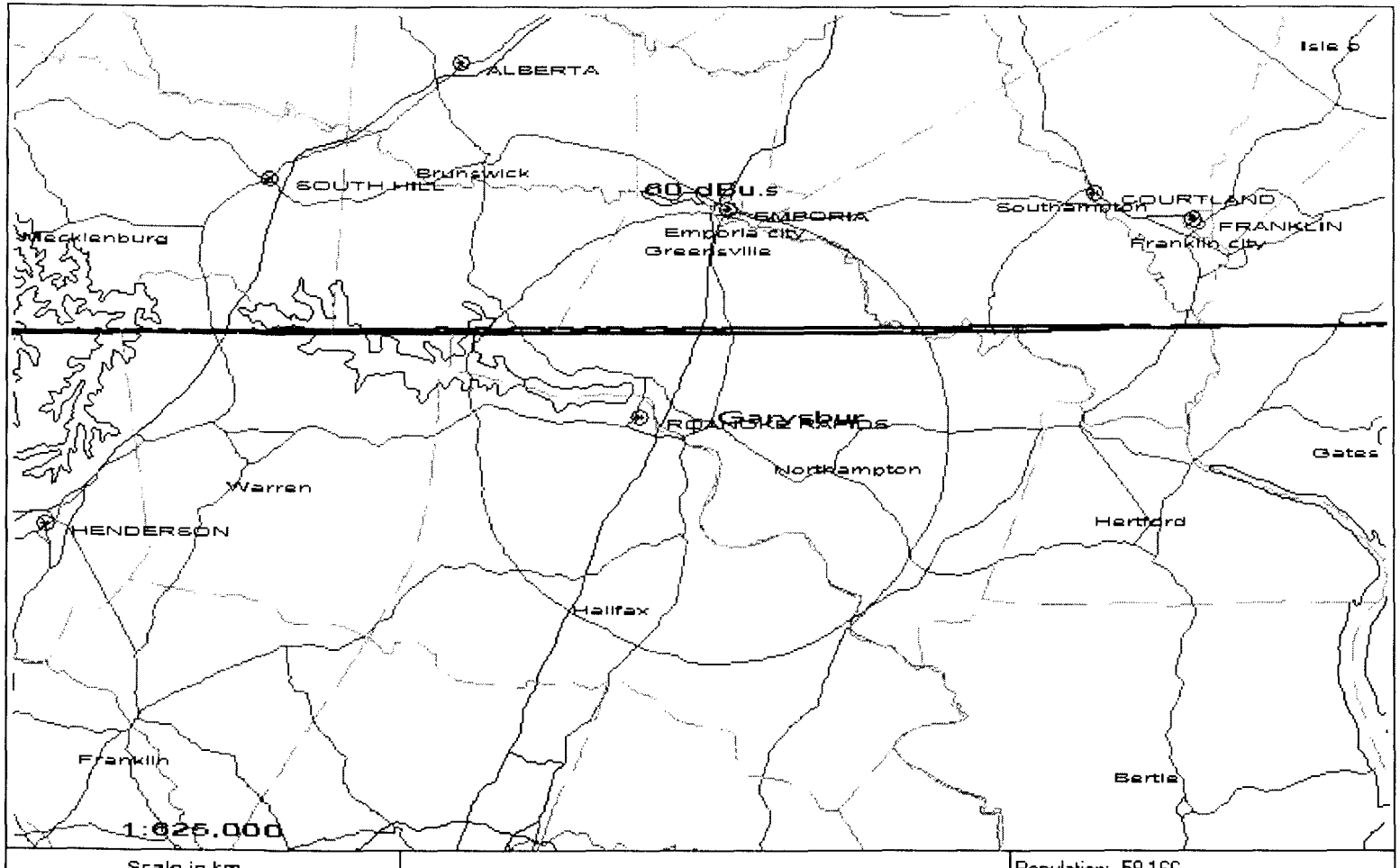
ENGINEERING STATEMENT

Attached is a study and map in support of the Reply Comments of MainQuad Broadcasting, Inc. showing that Garysburg Radio's counterproposal, requesting the Commission to substitute Channel 299A for Channel 276A at Alberta, Virginia and to allot Channel 276A to Garysburg, North Carolina at coordinates North Latitude 36° 26' 30" and West Longitude 77° 35' 00", would provide coverage to 58,166 people over 2,518 square kilometers within the 60 dBu contour of the proposed Garysburg allocation facilities.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

Frank White

February 13, 2001



Scale in km

0 10 20 30 40

Garysburg 276A 6kW 139.64M

N. Lat. 36 26 30 W. Lng. 77 35 00

Population: 58,166

Area: 2,518 Sq Kilometers

	Total	Caucasian	Afro Am	Amer Ind	Asian Am
NC	51,224	26,715	24,203	132	126
VA	6,942	3,428	3,481	22	11
Total=	58,166	30,143	27,684	154	137

EXHIBIT 2

WHEELER **BROADCAST** CONSULTING

Engineering Statement

Technical Support to Reply Comments of MainQaud Broadcasting, Inc.

MM Docket 00-245, RM-9971

This consultant has been retained by MainQuad Broadcasting, Inc. (MainQuad) for the purpose of providing technical support to its reply comments in the above captioned proceeding. MainQuad is the successor in interest in radio station WAQD (FM) and hence this proceeding by virtue of the assignment of the WAQD (FM) Construction Permit from the original petitioner, Broomfield Broadcasting, Inc. to MainQuad Broadcasting, Inc[1].

In its original request, Broomfield Broadcasting sought the amendment of 47 CFR 73.202(b) by allocating Channel 299 A at Alberta, VA, reallocating Channel 276 from Alberta, VA to Whitakers, NC as a Class C3 operation and modifying the license of WAQD accordingly. The Commission released a Notice of Proposed Rule Making on December 8, 2000 with comments due on January 29, 2001 and reply comments due on February 13, 2001. The notice elicited three comments; the comments in support of the proposal by MainQuad and two counterproposals which were filed by Garysburg Radio and Dinwiddie Radio Company (DRC).

6025 MARTWOOD
SUITE 117
MISSION, KS 66202
913 362 7287
913 362 7287

Urbanized Area Issues

DRC raises urbanized area issues with respect to the Whitakers, NC proposal sought by MainQuad. It begins by asserting that the allocation site referenced by Broomfield is incorrect as it is not the closest geographic point to the City of Whitakers. The requirements in selecting an allocation point for the purposes of allocation are:

[1] See BAPH-20000711 AAQ.

1) The allocation site must meet all minimum spacing requirements of 47 CFR 73.207.
2) The allocation site must be a site where a radio station transmitter could be located.
3) The entire community of license must be located within the flat earth 70 dBu distance to contour predictions (23.2 km in the case of a Class C3 operation) from the proposed allocation point so as to conform with 47 CFR 73.315 of the Commission's Rules.

So long as the above requirements are met, the petitioner is free to select whatever point it so chooses. The secondary Whitakers allocation point[2] suggested by DRC to be "more appropriate" is located adjacent to a creek and that creek has numerous wetlands surrounding it. While that particular point is not marked on the USGS topographic maps as being a wetland, its proximity to the creek bed and the number of wetland areas surrounding it raises the possibility that the site itself is a wetland. Much of the area around Whitakers, NC is wetland area that is not environmentally suitable for the construction of an FM radio transmitter. The original Whitakers Channel 276 C3 allocation reference site was chosen for two purposes. First, the point is on high elevation ground with no surrounding wetland areas. Secondly, the site affords a measure of protection against being locked on the allocation point due to subsequently filed modification applications or Rule Makings. If the allocation point were chosen at the point nearest to Whitakers which met the absolute minimum spacing requirements of 47 CFR 73.207 the possibility exists that, due to the actions of a third party, the allocation point would be the only available point to locate the Whitakers transmitter site.

The allocation reference site, as originally proposed, is located 18.17 km distant from the nearest point[3] to the Rocky Mount Urbanized area. The alternate DRC allocation point is located 15.40 km from the nearest point to the Rocky Mount Urbanized area. From the original Whitakers allocation point, a 23.2 km arc from the allocation site encompasses 14.02% of the total urbanized area. This overlap is graphically shown on a large scale in Exhibit 1 and in detail in Exhibit 2.

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[2] The coordinates of the secondary allocation point suggested as appropriate by DRC are N 36° 10' 23" by W 77° 49' 51".

[3] The Rocky Mount Urbanized area is disjointed with a small portion of that area being located 1.5 km North of the main body of the urban core.

From the alternate allocation point suggested by DRC, a 23.2 km arc[4] from that point encompasses 37.14% of the Rocky Mount urbanized area. In both cases, the proposed Whitakers operation overlaps with less than 50% of the urbanized area. A map depicting the overlap area from the alternate point suggested by DRC is included in this report as Exhibit 3.

The proposed Whitakers Channel 276 C3 operation will provide 60 dBu service to 100% of the Rocky Mount urbanized area. The population of the Rocky Mount urbanized area totals 50,870 persons according to the 1990 US Census. The total population served by the proposed Whitakers operation, as originally submitted, provides 60 dBu (360 radial real terrain) service to an area encompassing 4,757.7 km² which contains a population of 172,219 persons. When flat earth models are employed the 60 dBu service area is 4,802.9 km² which contains a population of 170,717 persons.

Methodology

Overall service area calculations were performed by employing the arithmetic average of the distance to contours based on 360 equally spaced radials in the case of real terrain determinations. Flat earth calculations were based on the geometric formula (πr^2) with the radius being the standard distance to contour distance for the class of the station under study. Overlapping area determinations were made by employing a K&E Model 620000 polar planimeter.

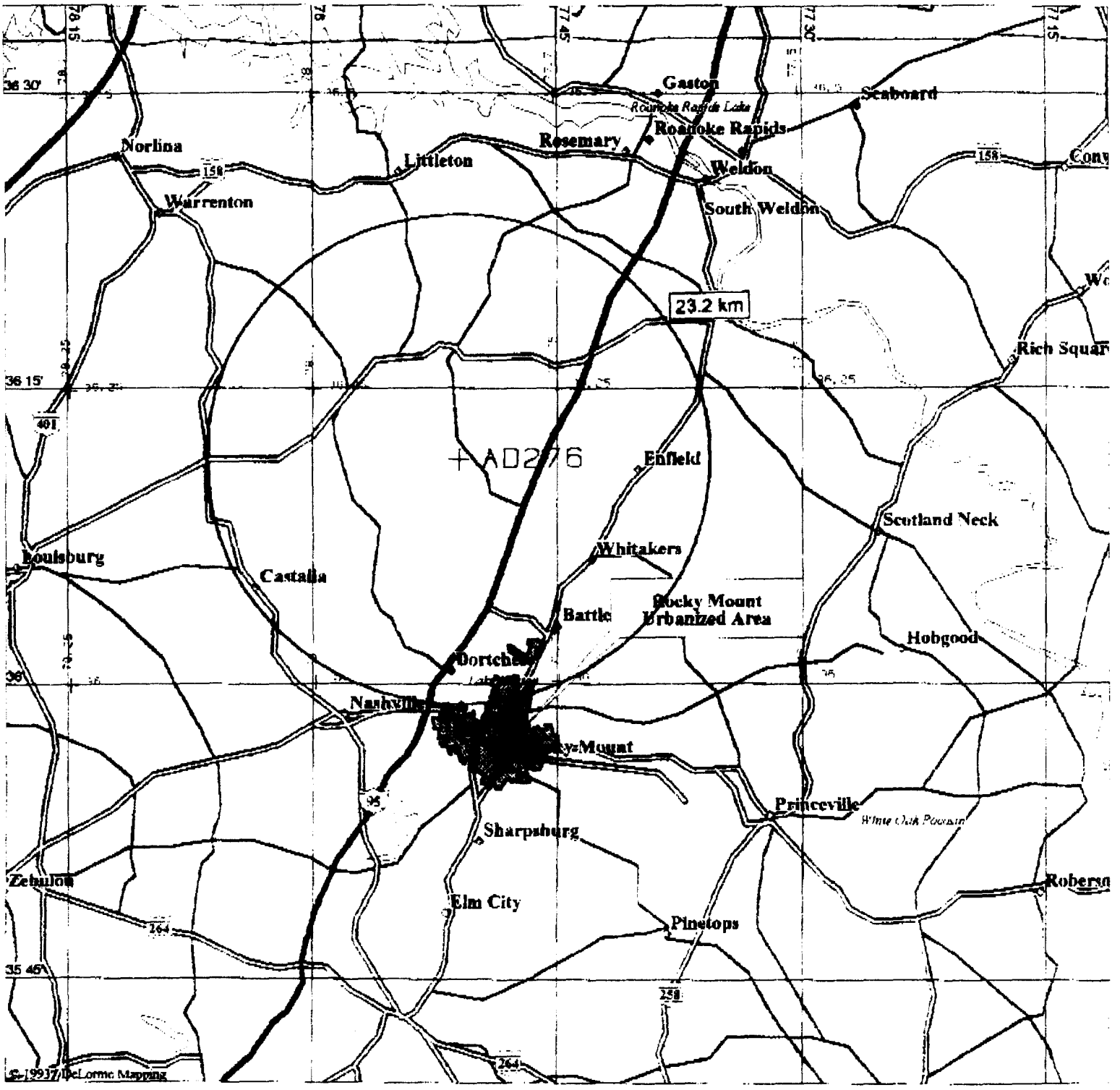
All information in this report is true and accurate to the best of my belief. Having had numerous matters before the Commission, my qualifications are a matter of record.

2/13/01
Date

R. Lee Wheeler

[4] The 23.2 km arc is based on the flat earth distance to the 70 dBu contour of a standard, 25 kW at 100m HAAT model class C3 facility. If flat earth standards must be upheld for the purpose of demonstrating 70 dBu coverage of the city of license, those same standards must apply to 70 dBu coverage of an urbanized area.

EXHIBIT 1



LEGEND

- Town, Small City
- Interstate, Turnpike
- US Highway
- State/Prov Boundary
- Population Center
- Major Street/Road
- Interstate Highway
- State Route
- US Highway
- Land Mass
- Open Water

Scale 1:500,000 (at center)

10 Miles

10 KM

Rocky Mount, NC Urbanized Area
Mag 10.00
Thu Feb 08 16:04:01 2001

EXHIBIT 2

LEGEND

- State Route
- Town, Small City
- Interstate, Turnpike
- US Highway
- County Boundary
- Population Center
- Major Street/Road
- Interstate Highway
- State Route
- US Highway
- Airfield
- Open Water

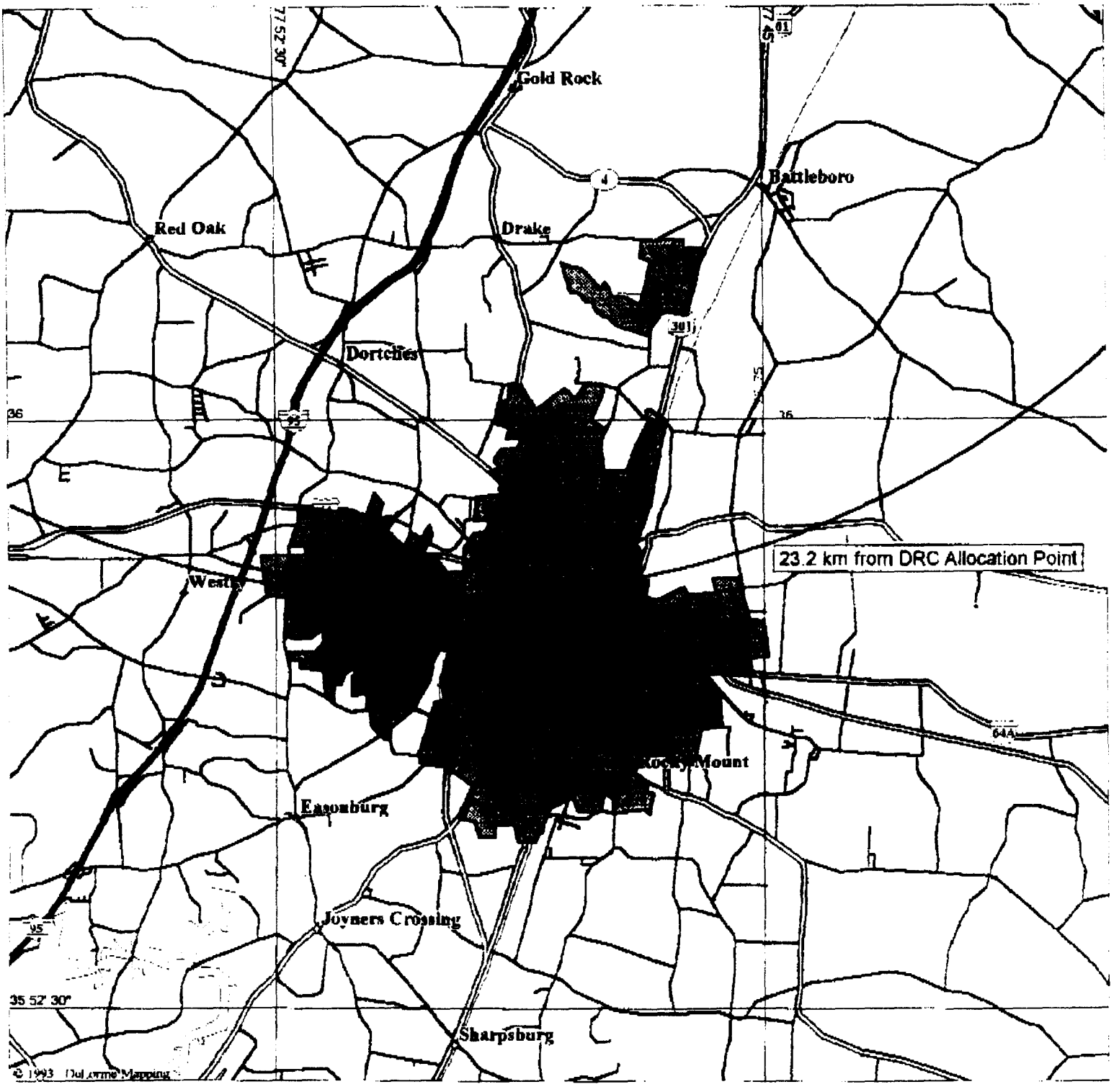
Scale 1:125,000 (at center)

2 Miles

2 KM

Rocky Mount, NC Urbanized Area
Mag 12.00
Thu Feb 08 15:53:59 2001

Exhibit 3



LEGEND

- State Route
- Town, Small City
- Interstate, Turnpike
- US Highway
- County Boundary
- Population Center
- Major Street/Road
- Interstate Highway
- State Route
- US Highway
- Airfield
- Open Water

Scale 1:125,000 (at center)

2 Miles

2 KM

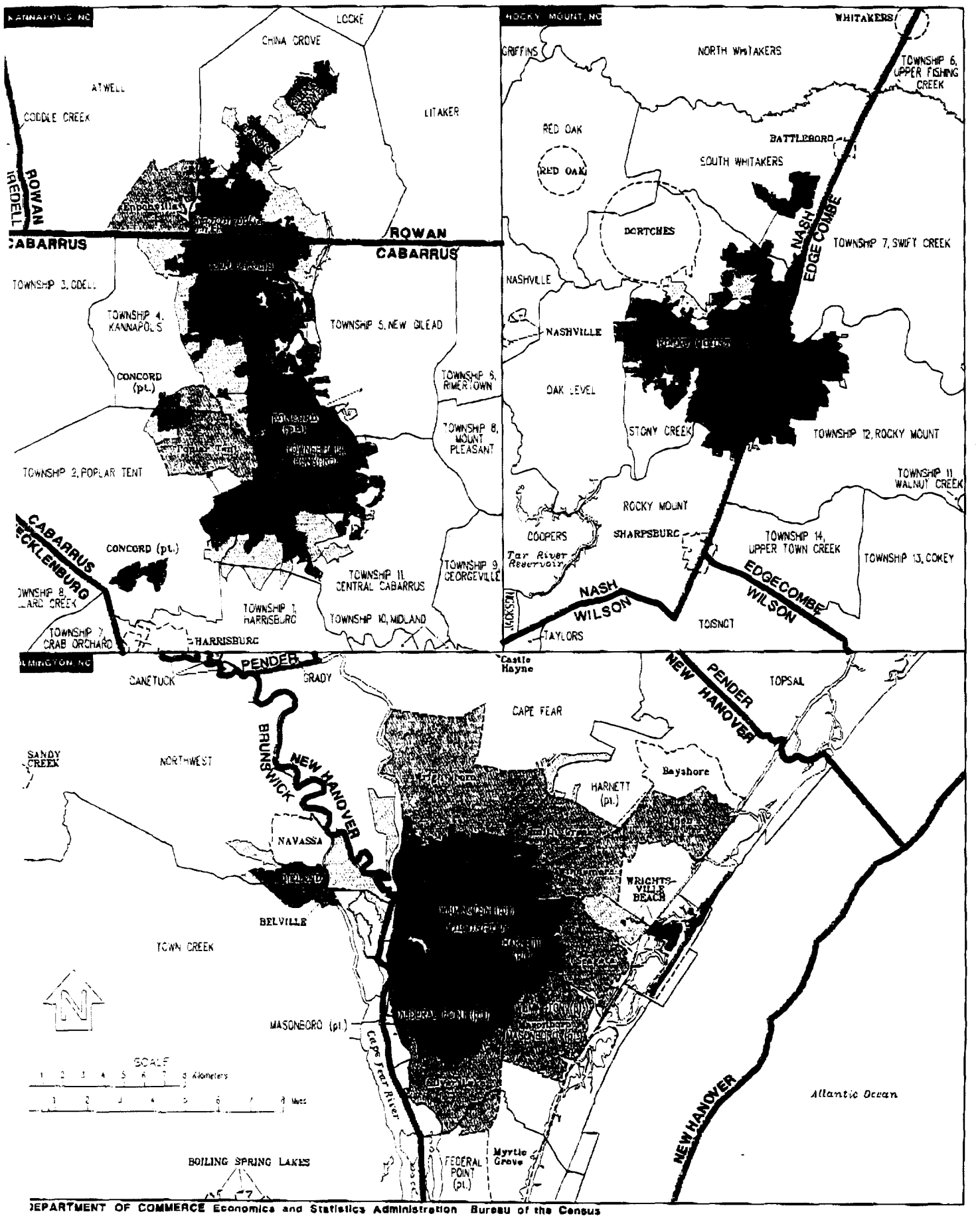
Rocky Mount, NC Urbanized Area

Mag 12.00

Thu Feb 08 15:53:59 2001

EXHIBIT 3

Urbanized Areas



DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census

Table 10. Population, Housing Units, Area Measurements, and Density for Urbanized Area: 1990 —Con.

[Density is computed using land area. For definitions of terms and meanings of symbols, see text]

Urbanized Area	Population	Housing units	Area measurements: Total area: Square kilometers	Total area: Square miles	Land area: Square kilometers	Land area: Square miles	Density: Population per— Square kilometer	Population per— Square mile	Housing units per— Square kilometer	Housing units per— Square mile
High Point, NC—Con.										
Trinity CDP	5 469	2 199	33.5	12.9	33.5	12.9	163.2	422.6	65.6	169.9
Jacksonville, NC	101 297	26 033	213.1	82.3	186.7	72.1	542.6	1 405.3	139.4	361.1
In central place	30 013	11 810	34.3	13.3	33.7	13.0	891.8	2 309.7	350.9	908.8
Jacksonville city, NC	30 013	11 810	34.3	13.3	33.7	13.0	891.8	2 309.7	350.9	908.8
Urban fringe	71 284	14 223	178.8	69.0	153.0	59.1	465.8	1 206.4	92.9	240.7
Onslow County (pt.)	101 297	26 033	213.1	82.3	186.7	72.1	542.6	1 405.3	139.4	361.1
Camp Lejeune unorg. (pt.)	46 472	4 637	95.5	36.9	70.6	27.2	658.6	1 705.7	65.7	170.2
Camp Lejeune Central CDP (pt.)	36 716	4 176	71.6	27.6	50.7	19.6	724.3	1 875.9	82.4	213.3
Jacksonville city (pt.)	-	-	.1	-	.1	-	-	-	-	-
New River Station CDP	9 732	447	23.8	9.2	19.8	7.6	492.5	1 275.5	22.6	58.6
Piney Green CDP (pt.)	24	15	-	-	-	-	1 200.0	3 108.0	750.0	1 942.5
Jacksonville township (pt.)	44 889	17 473	74.8	28.9	73.4	28.3	611.7	1 584.4	238.1	616.7
Camp Lejeune Central CDP (pt.)	-	-	-	-	-	-	-	-	-	-
Half Moon CDP (pt.)	5 754	1 921	9.6	3.7	9.6	3.7	596.4	1 544.7	199.1	515.7
Jacksonville city (pt.)	30 013	11 810	34.3	13.2	33.6	13.0	894.1	2 315.7	351.8	911.2
Pumpkin Center CDP	2 857	955	5.6	2.2	5.6	2.2	511.7	1 325.4	171.1	443.0
Richlands township (pt.)	552	185	6.6	2.6	6.6	2.6	83.5	216.3	28.0	72.5
Half Moon CDP (pt.)	552	185	6.6	2.6	6.6	2.6	83.5	216.3	28.0	72.5
Stump Sound township (pt.)	409	192	.9	.4	.9	.4	436.5	1 130.5	204.9	530.7
White Oak township (pt.)	8 975	3 546	35.3	13.6	35.2	13.6	254.9	660.2	100.7	260.8
Jacksonville city (pt.)	-	-	-	-	-	-	-	-	-	-
Piney Green CDP (pt.)	8 975	3 546	35.3	13.6	35.2	13.6	254.9	660.2	100.7	260.8
Kannapolis, NC	78 177	32 915	172.8	66.7	170.9	66.0	457.5	1 185.0	192.6	498.9
In central place	29 696	12 717	41.1	15.9	40.7	15.7	730.5	1 892.0	312.8	810.2
Kannapolis city, NC	29 696	12 717	41.1	15.9	40.7	15.7	730.5	1 892.0	312.8	810.2
Urban fringe	48 481	20 198	131.7	50.8	130.2	50.3	372.3	964.3	155.1	401.7
Cabarrus County (pt.)	58 829	24 661	129.2	49.9	128.5	49.6	457.8	1 185.8	191.9	497.1
Township 1, Harrisburg (pt.)	240	89	1.6	.6	1.6	.6	148.5	384.7	55.1	142.6
Township 2, Poplar Tent (pt.)	4 924	1 824	22.8	8.8	22.8	8.8	216.1	559.6	80.0	207.3
Concord city (pt.)	969	328	8.9	3.4	8.9	3.4	108.9	282.1	36.9	95.5
Poplar Tent CDP (pt.)	3 086	1 182	11.7	4.5	11.7	4.5	264.7	685.7	101.4	262.6
Township 4, Kannapolis (pt.)	28 633	12 283	57.0	22.0	56.3	21.7	508.7	1 317.5	218.2	565.2
Concord city (pt.)	2 743	1 305	8.8	3.4	8.3	3.3	328.2	837.2	153.8	396.3
Kannapolis city (pt.)	21 220	9 194	28.9	11.1	28.9	11.1	735.1	1 904.0	316.4	819.6
Poplar Tent CDP (pt.)	786	288	2.5	1.0	2.5	1.0	313.4	811.7	114.8	297.4
Township 5, New Gilead (pt.)	325	109	1.3	.5	1.3	.5	250.8	649.5	79.5	205.8
Concord city (pt.)	182	57	.8	.3	.8	.3	218.7	566.6	68.5	177.4
Township 11, Central Cabarrus (pt.)	7 705	3 057	24.7	9.5	24.7	9.5	311.6	807.1	123.6	320.2
Concord city (pt.)	6 451	2 621	16.5	6.4	16.5	6.4	391.2	1 013.2	158.9	411.7
Township 12, Concord (pt.)	17 002	7 305	21.8	8.4	21.8	8.4	780.8	2 022.3	335.5	868.9
Concord city (pt.)	17 002	7 305	21.8	8.4	21.8	8.4	780.8	2 022.3	335.5	868.9
Rowan County (pt.)	19 348	8 254	43.6	16.8	42.4	16.4	456.6	1 182.6	194.8	504.5
Atwell township (pt.)	2 906	1 159	12.1	4.7	11.5	4.4	253.6	656.8	101.1	261.9
Enochville CDP (pt.)	2 901	1 157	12.1	4.7	11.4	4.4	253.8	657.4	101.2	262.2
Kannapolis city (pt.)	-	-	-	-	-	-	-	-	-	-
China Grove township (pt.)	16 442	7 095	31.5	12.2	30.9	11.9	531.9	1 377.6	229.5	594.4
China Grove town	2 732	1 163	3.8	1.5	3.8	1.5	721.0	1 867.5	306.9	795.0
Enochville CDP (pt.)	-	-	-	-	-	-	-	-	-	-
Kannapolis city (pt.)	8 476	3 583	12.2	4.7	11.8	4.5	720.9	1 867.1	304.7	789.2
Landis town	2 333	1 055	4.0	1.5	4.0	1.5	590.2	1 528.6	266.9	691.2
Raleigh, NC	305 925	131 487	461.1	178.0	455.7	175.9	671.3	1 738.7	288.5	747.3
In central place	207 951	92 643	230.1	88.8	228.3	88.1	911.0	2 359.5	405.9	1 051.2
Raleigh city, NC	207 951	92 643	230.1	88.8	228.3	88.1	911.0	2 359.5	405.9	1 051.2
Urban fringe	97 974	38 844	231.1	89.2	227.4	87.8	430.8	1 115.7	170.8	442.3
Wake County (pt.)	305 925	131 487	461.1	178.0	455.7	175.9	671.3	1 738.7	288.5	747.3
Bartons Creek township (pt.)	5 366	1 728	16.1	6.2	16.0	6.2	335.3	868.5	108.0	279.7
Raleigh city (pt.)	101	33	1.1	.4	1.1	.4	90.3	233.8	29.5	76.4
Cary township (pt.)	44 048	18 011	63.9	24.7	63.3	24.4	696.0	1 802.7	284.6	737.1
Apex town (pt.)	-	-	.1	-	.1	-	-	-	-	-
Cary town (pt.)	40 926	16 804	49.8	19.2	49.3	19.0	829.5	2 148.4	340.6	882.1
Raleigh city (pt.)	7	3	5.1	2.0	5.1	2.0	1.4	3.6	.6	1.5
Cedar Fork township (pt.)	850	462	29.0	11.2	28.8	11.1	29.6	76.6	16.1	41.6
Cary town (pt.)	629	313	15.1	5.8	15.0	5.8	41.8	108.3	20.8	53.9
Raleigh city (pt.)	26	16	13.5	5.2	13.3	5.1	2.0	5.1	1.2	3.1
Holly Springs township (pt.)	223	72	1.8	.7	1.8	.7	126.3	327.2	40.8	105.7
Apex town (pt.)	223	72	1.8	.7	1.8	.7	126.3	327.2	40.8	105.7
House Creek township (pt.)	43 980	20 165	49.5	19.1	49.1	18.9	896.1	2 321.0	410.9	1 064.2
Raleigh city (pt.)	42 565	19 509	45.3	17.5	45.0	17.4	946.8	2 452.3	434.0	1 124.0
Leesville township (pt.)	11 992	5 430	19.1	7.4	18.8	7.3	638.1	1 652.7	288.9	748.3
Raleigh city (pt.)	6 258	3 496	4.3	1.6	4.1	1.6	1 532.3	3 968.7	856.0	2 217.1
Meredith township (pt.)	7 894	3 771	21.6	8.3	21.5	8.3	366.8	950.1	175.2	453.9
Raleigh city (pt.)	6 962	3 297	15.2	5.1	13.2	5.1	526.3	1 363.2	249.3	645.6
Neuse township (pt.)	31 370	13 941	32.4	12.5	32.3	12.5	971.1	2 515.1	431.6	1 117.7
Raleigh city (pt.)	26 134	12 006	21.5	8.3	21.4	8.3	1 218.7	3 156.5	559.9	1 450.1
Panther Branch township (pt.)	24	12	4.7	1.8	2.9	1.1	8.2	21.3	4.1	10.6
Garner town (pt.)	24	12	4.7	1.8	2.9	1.1	8.2	21.3	4.1	10.6
Raleigh township (pt.)	103 732	45 155	96.1	37.1	95.7	36.9	1 084.1	2 807.7	471.9	1 222.2
Raleigh city (pt.)	102 979	44 776	93.2	36.0	92.9	35.9	1 108.1	2 870.0	481.8	1 247.9
St. Marys township (pt.)	25 616	9 859	45.2	17.5	44.9	17.3	570.5	1 477.6	219.6	568.7
Garner town (pt.)	14 940	5 962	25.7	9.9	25.5	9.8	586.0	1 517.8	233.9	605.7
Raleigh city (pt.)	7 969	2 871	9.8	3.8	9.8	3.8	816.7	2 115.4	294.3	762.1
St. Matthews township (pt.)	15 552	6 326	40.9	15.8	40.6	15.7	382.9	991.6	155.7	403.4
New Hope CDP	5 694	2 354	21.6	8.3	21.4	8.3	265.9	688.6	109.9	284.7
Raleigh city (pt.)	8 649	3 539	16.1	6.2	16.1	6.2	538.8	1 395.5	220.5	571.0
Swift Creek township (pt.)	10 225	4 644	21.5	8.3	20.7	8.0	494.2	1 280.1	224.5	581.4
Cary town (pt.)	2 015	743	7.1	2.7	6.8	2.6	297.4	770.2	109.7	284.0
Garner town (pt.)	3	1	1.1	.4	1.0	.4	2.9	7.4	1.0	2.5
Raleigh city (pt.)	6 301	3 097	6.8	2.6	6.3	2.4	996.0	2 579.8	489.6	1 268.0
White Oak township (pt.)	5 053	1 911	19.3	7.5	19.4	7.5	260.7	675.1	98.6	255.3
Apex town (pt.)	4 745	1 754	9.0	3.5	9.0	3.5	528.0	1 367.5	195.2	505.5
Cary town (pt.)	288	148	9.6	3.7	9.6	3.7	30.1	78.1	15.5	40.1
Rocky Mount, NC	50 870	20 877	69.4	26.8	68.9	26.6	738.7	1 913.2	303.1	785.2
In central place	48 997	20 173	65.2	25.2	64.7	25.0	757.3	1 961.3	311.8	807.5
Rocky Mount city, NC	48 997	20 173	65.2	25.2	64.7	25.0	757.3	1 961.3	311.8	807.5
Urban fringe	1 873	704	4.2	1.6	4.2	1.6	449.8	1 165.0	169.1	437.9
Edgecombe County (pt.)	17 204	6 659	16.8	6.5	16.8	6.5	1 026.7	2 659.2	397.4	1 029.3
Township 7, Swift Creek (pt.)	-	-	1.1	.4	1.1	.4	-	-	-	-
Rocky Mount city (pt.)	-	-	1.1	.4	1.1	.4	-	-	-	-
Township 12, Rocky Mount (pt.)	17 204	6 659	15.6	6.0	15.6	6.0	1 102.4	2 855.2	426.7	1 105.1
Rocky Mount city (pt.)	17 057	6 594	15.2	5.9	15.2	5.9	1 118.9	2 897.8	432.5	1 120.3

Table 10. **Population, Housing Units, Area Measurements, and Density for Urbanized Area: 1990** —Con.

[Density is computed using land area. For definitions of terms and meanings of symbols, see text]

Urbanized Area	Population	Housing units	Area measurements: Total area: Square kilometers	Total area: Square miles	Land area: Square kilometers	Land area: Square miles	Density: Population per— Square kilometer	Population per— Square mile	Housing units per— Square kilometer	Housing units per— Square mile
ocky Mount, NC—Con.										
Nash County (pt.)	33 666	14 218	52.6	20.3	52.1	20.1	646.0	1 673.3	272.8	706.7
Oak Level township (pt.)	916	374	.5	.2	.5	.2	1 828.3	4 735.4	746.5	1 933.5
Rocky Mount city (pt.)	916	374	.5	.2	.5	.2	1 828.3	4 735.4	746.5	1 933.5
Rocky Mount township (pt.)	14 544	6 409	12.8	4.9	12.8	4.9	1 140.9	2 954.8	502.7	1 301.9
Rocky Mount city (pt.)	14 524	6 398	12.7	4.9	12.7	4.9	1 143.3	2 961.0	503.6	1 304.4
South Whitakers township (pt.)	353	147	4.0	1.5	3.6	1.4	97.1	251.4	40.4	104.7
Rocky Mount city (pt.)	353	147	4.0	1.5	3.6	1.4	97.1	251.4	40.4	104.7
Stony Creek township (pt.)	17 851	7 288	35.4	13.6	35.2	13.6	506.8	1 312.6	206.9	535.9
Rocky Mount city (pt.)	16 147	6 660	31.6	12.2	31.5	12.1	513.1	1 329.0	211.7	548.2
Wilmington, NC	101 357	45 786	229.8	88.7	216.5	83.6	468.1	1 212.5	211.5	547.7
In central place	55 530	26 469	77.6	30.0	76.9	29.7	722.0	1 870.0	344.2	891.4
Wilmington city, NC	55 530	26 469	77.6	30.0	76.9	29.7	722.0	1 870.0	344.2	891.4
Urban fringe	45 827	19 317	152.3	58.8	139.6	53.9	328.3	850.2	138.4	358.4
Brunswick County (pt.)	2 725	1 101	14.1	5.4	13.6	5.2	200.9	520.3	81.2	210.2
Northwest township (pt.)	2 417	961	10.8	4.2	10.3	4.0	234.4	607.1	93.2	241.4
Belville town (pt.)	-	-	.1	-	-	-	-	-	-	-
Leland town (pt.)	1 559	643	3.8	1.5	3.6	1.4	427.2	1 106.6	176.2	456.4
Town Creek township (pt.)	308	140	3.3	1.3	3.3	1.3	94.7	245.2	43.0	111.5
Belville town (pt.)	66	33	.7	.3	.6	.2	110.6	286.3	55.3	143.2
Leland town (pt.)	242	107	1.7	.7	1.7	.7	141.0	365.3	62.4	161.5
New Hanover County (pt.)	98 632	44 685	215.7	83.3	203.0	78.4	486.0	1 258.7	220.2	570.3
Cape Fear township (pt.)	7 424	2 821	42.9	16.6	40.2	15.5	184.9	478.8	70.2	181.9
Smith Creek CDP (pt.)	1 379	541	2.8	1.1	2.8	1.1	492.9	1 276.5	193.4	500.8
Wrightsboro CDP (pt.)	4 745	1 798	32.0	12.3	32.0	12.3	148.4	384.3	56.2	145.6
Federal Point township (pt.)	438	177	2.8	1.1	2.8	1.1	158.5	410.6	64.1	165.9
Silver Lake CDP (pt.)	438	177	2.8	1.1	2.8	1.1	158.7	411.0	64.1	166.1
Harnett township (pt.)	24 864	11 298	58.7	22.7	54.0	20.9	460.2	1 191.9	209.1	541.6
Ogden CDP	3 228	1 319	12.5	4.8	12.2	4.7	263.6	682.8	107.7	279.0
Seagate CDP	5 444	2 259	13.0	5.0	11.5	4.4	474.3	1 228.3	196.8	509.7
Smith Creek CDP (pt.)	6 082	2 274	11.0	4.2	11.0	4.2	555.1	1 437.7	207.5	537.5
Wilmington city (pt.)	267	93	.9	.4	.9	.4	281.9	730.2	98.2	254.4
Windemere CDP	4 604	1 807	9.9	3.8	9.9	3.8	467.4	1 210.5	183.4	475.1
Wrightsboro CDP (pt.)	7	6	.1	-	.1	-	137.3	355.5	117.6	304.7
Wrightsville Beach town	2 937	2 413	5.8	2.3	3.4	1.3	851.6	2 205.5	699.6	1 812.0
Masonboro township (pt.)	10 623	4 006	34.7	13.4	30.0	11.6	354.0	916.9	133.5	345.8
Masonboro CDP (pt.)	6 990	2 680	17.4	6.7	15.8	6.1	443.4	1 148.4	170.0	440.3
Silver Lake CDP (pt.)	3 633	1 326	14.2	5.5	14.2	5.5	255.4	661.6	93.2	241.5
Wilmington township	55 283	26 383	76.7	29.6	76.0	29.3	727.5	1 884.3	347.2	899.2
Masonboro CDP (pt.)	20	7	-	-	-	-	740.7	1 918.5	259.3	671.5
Wilmington city (pt.)	55 263	26 376	76.6	29.6	76.0	29.3	727.5	1 884.2	347.2	899.3
nston-Salem, NC	185 184	83 274	314.7	121.5	312.6	120.7	592.5	1 534.5	266.4	690.1
n central place	143 485	65 631	185.8	71.7	184.2	71.1	778.9	2 017.4	356.3	922.8
Winston-Salem city, NC	143 485	65 631	185.8	71.7	184.2	71.1	778.9	2 017.4	356.3	922.8
Urban fringe	41 699	17 643	129.0	49.8	128.3	49.6	324.9	841.5	137.5	356.0
Davidson County (pt.)	118	50	.1	.1	.1	.1	791.9	2 051.1	335.6	869.1
Midway township (pt.)	118	50	.1	.1	.1	.1	791.9	2 051.1	335.6	869.1
Forsyth County (pt.)	185 066	83 224	314.6	121.5	312.4	120.6	592.4	1 534.3	266.4	690.0
Abbotts Creek township (pt.)	2 295	905	7.4	2.9	7.4	2.9	309.7	802.1	122.1	316.3
Sedge Garden CDP (pt.)	2 295	905	7.4	2.9	7.4	2.9	309.7	802.1	122.1	316.3
Bethania township (pt.)	7 917	3 543	23.8	9.2	23.7	9.2	333.8	864.5	149.4	386.9
Rural Hall town	1 652	786	2.6	1.0	2.6	1.0	634.4	1 643.1	301.8	781.8
Stanleyville CDP (pt.)	4 617	2 140	16.6	6.4	16.6	6.4	278.3	720.9	129.0	334.1
Broadbay township (pt.)	5 072	2 396	16.3	6.3	16.3	6.3	312.0	808.0	147.4	381.7
Sedge Garden CDP (pt.)	477	188	2.0	.8	2.0	.8	236.4	612.2	93.2	241.3
Clemmonsville township (pt.)	7 615	2 852	24.3	9.4	24.0	9.3	317.5	822.2	118.9	307.9
Clemmons village (pt.)	5 809	2 167	12.1	4.7	11.9	4.6	488.2	1 264.3	182.1	471.6
Kernersville township (pt.)	79	26	.3	.1	.3	.1	257.3	666.5	84.7	219.3
Sedge Garden CDP (pt.)	12	4	-	-	-	-	1 714.3	4 440.0	571.4	1 480.0
Lewisville township (pt.)	2 323	928	5.4	2.1	5.4	2.1	429.3	1 111.9	171.5	444.2
Clemmons village (pt.)	211	89	.2	.1	.2	.1	1 226.7	3 177.3	517.4	1 340.2
Middle Fork township (pt.)	5 280	1 996	18.9	7.3	18.9	7.3	279.9	724.8	105.8	274.0
Stanleyville CDP (pt.)	152	64	.7	.3	.7	.3	220.6	571.4	92.9	240.6
Walkertown town (pt.)	113	49	.8	.3	.8	.3	147.3	381.6	63.9	165.5
Winston-Salem city (pt.)	14	3	-	-	-	-	636.4	1 648.2	136.4	353.2
Old Town township (pt.)	2 984	1 319	7.5	2.9	7.5	2.9	398.2	1 031.4	176.0	455.9
Stanleyville CDP (pt.)	10	8	.2	.1	.2	.1	51.3	132.8	41.0	106.3
Winston-Salem city (pt.)	53	18	.1	-	.1	-	486.2	1 259.4	165.1	427.7
Salem Chapel township (pt.)	1 857	791	4.8	1.8	4.8	1.8	388.0	1 004.9	165.3	428.1
Walkertown town (pt.)	1 087	490	2.9	1.1	2.9	1.1	369.9	957.9	166.7	431.8
South Fork township (pt.)	4 554	2 218	15.4	5.9	15.4	5.9	296.5	767.8	144.4	374.0
Winston-Salem city (pt.)	-	-	.4	.1	.4	.1	-	-	-	-
Vienna township (pt.)	1 619	618	5.0	1.9	5.0	1.9	324.4	840.2	123.8	320.7
Winston township	143 471	66 632	185.4	71.6	183.8	71.0	780.5	2 021.6	357.1	924.8
Winston-Salem city (pt.)	143 418	65 610	185.3	71.5	183.7	70.9	780.6	2 021.8	357.1	924.9

EXHIBIT 4

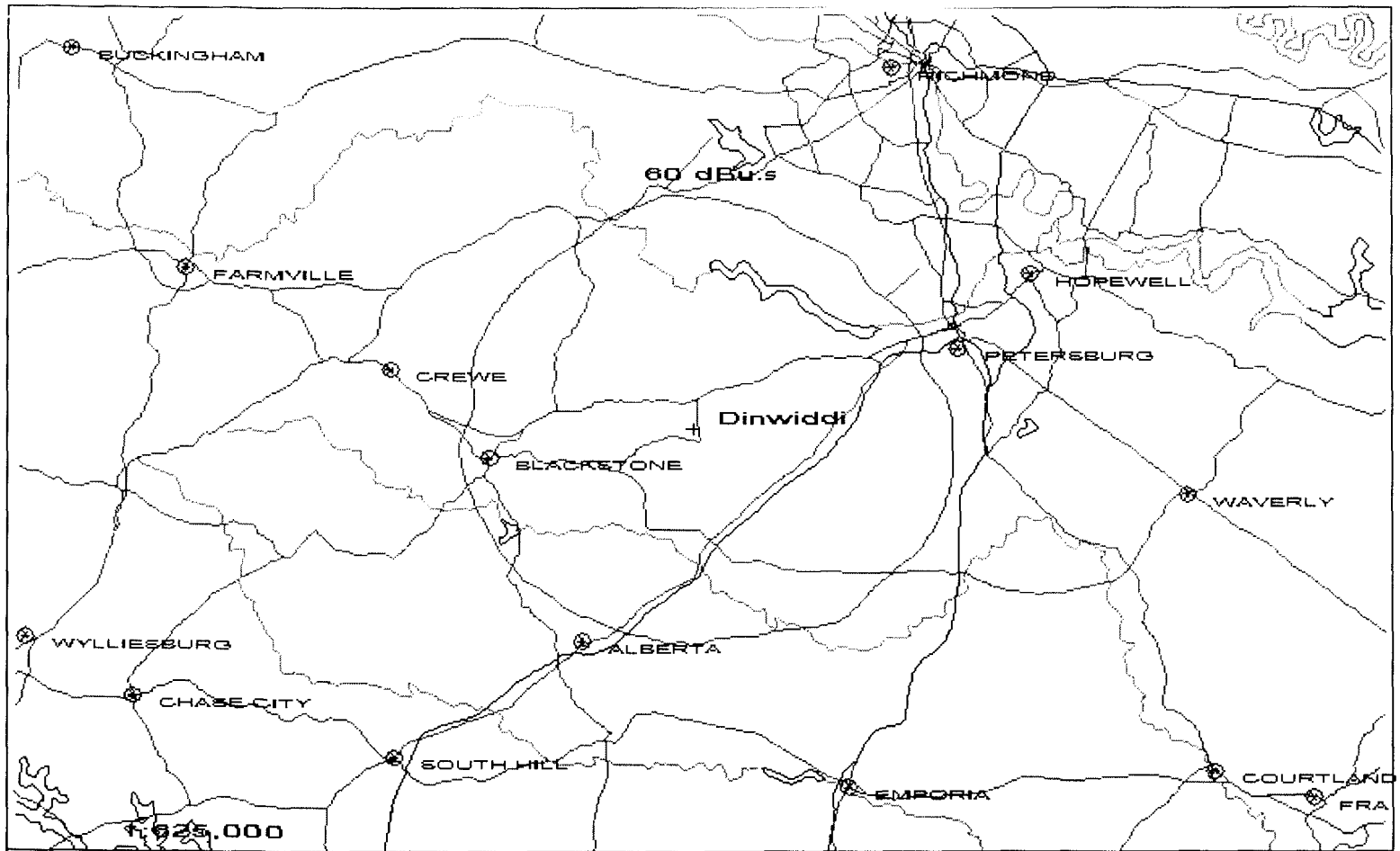
ENGINEERING STATEMENT

Attached is a study and map in support of the Reply Comments of MainQuad Broadcasting, Inc. showing that Dinwiddie Radio Company's counterproposal, requesting the Commission to allot Channel 299A to Dinwiddie, Virginia at coordinates North Latitude 37° 06' 47" and West Longitude 77° 44' 17", would provide coverage to 41,688 people over 2,513 square kilometers within the 60 dBu contour of the proposed Dinwiddie allocation facilities.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

Frank White

February 13, 2001



Scale in km

0 10 20 30 40

Dinwiddie 299A 6kW 182.11M

N. Lat. 37 06 47 W. Lng. 77 44 17

Population: 41,688

Area: 2,513 Sq Kilometers

	Total	Caucasian	Afro Am	Amer Ind	Asian Am
VA	41,688	25,889	15,559	58	116
Total=	41,688	25,889	15,559	58	116

Exhibit 5

Declaration

I, Frank White, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge and belief:

1. I have visited the site of the Dinwiddie Volunteer Rescue Squad, the Southside Middle School (which is the current location of the Dinwiddie Elementary School), the Restoration Christian Center and the Olive Branch Baptist Church. At the time of the visit, I took GPS readings at each of the locations so as to allow me to accurately measure the distance of the locations from the reference coordinates specified in the counterproposal of Dinwiddie Radio Company. My calculations revealed that each of the locations is more than 16.2 kilometers from the reference coordinates. The Commission considers 16.2 kilometers to be the standard distance to the 70 dBu contour of a Class A station.

2. Similarly, I have reviewed the information provided by the Census Bureau on its Internet site regarding the location of the Rowatny and Sapony Census Districts. Based upon that review, I have concluded that portions of those districts are located more than 16.2 kilometers from the Dinwiddie Radio Company reference coordinates.

3. I have reviewed a depiction of the Dinwiddie Voting Precinct. Portions of that precinct are more than 16.2 kilometers from the proposed Dinwiddie reference coordinates.

Frank White

February 13, 2001

CERTIFICATE OF SERVICE

The undersigned, an employee of Garvey, Schubert & Barer, hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, to the following:

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Grace M. Kavadoy

February 13, 2001

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