

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of )  
 )  
Amendment of Section 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations. )  
(Ardmore, Brilliant, Gadsden, Moundville, )  
Pleasant Grove, Scottsboro, Trussville, )  
Tuscaloosa and Winfield, Alabama, )  
Columbus and Okolona, Mississippi, )  
McMinnville, Pulaski and Walden, )  
Tennessee) )  
 )

MM Docket No. 01-62  
RM-10053

TO: Chief, Allocations Branch

**REPLY COMMENTS OF JIM LAWSON COMMUNICATIONS, INC.**

Jim Lawson Communications, Inc. ("Lawson"), by its attorney, hereby submits the following Reply Comments in this proceeding.

1. In Comments and Counterproposal, filed in this proceeding on April 18, 2001, Lawson, the licensee of FM Broadcast Station WQZZ, Eutaw, Alabama, requested the Commission to allot Channel 278C3 to Eutaw, Alabama, and to issue an order directing Lawson to show cause why the license of Station WQZZ should not be modified to specify operation on Chanel 278C3 instead of Channel 282A. Additionally, Lawson suggested that Channel 282 be allotted to Moundville, Alabama, as that community's first local broadcast service. Lawson continues to support its Counterproposal and reaffirms that if the allotments are made Lawson will file

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applications for both allotments. Furthermore, if Lawson is granted a construction permit for Channel 278C3 at Eutaw, Lawson will promptly construct the facilities and place them in operation in the public interest. Additionally, if granted a construction permit for a new facility to operate on Chanel 282A at Moundville, Alabama, Lawson will also promptly construct that facility and place it in operation in the public interest.

2. Lawson's principal objective in this proceeding is to secure an upgrade in the facilities of Station WQZZ. Lawson needs that upgrade because Station WQZZ provides a unique programming service to the Black community in Tuscaloosa, Alabama, but the quality of the signal provided by Station WQZZ, operating as a Class A facility, is substandard in many parts of the Tuscaloosa area.

3. Attached hereto is an engineering statement, prepared by Lawson's engineer, John Mullaney. In his statement, Mr. Mullaney shows, inter alia, that Channel 278C3 can be allocated to Eutaw, Alabama, consistent with the Capstar proposal to allot Channel 279C1 to Trussville. This can be done by specifying a special reference site for the Trussville allotment. Alternatively, Channel 279 can be allotted to Trussville as a C2 facility, without any short spacing and consistent with the upgrade at Station WQZZ to a C3 facility, operating on Channel 278. Lawson affirmatively suggests these alternatives as a means of satisfying both its own objectives and those of Capstar.

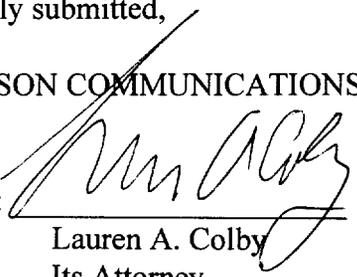
May 8, 2001

Respectfully submitted,

JIM LAWSON COMMUNICATIONS, INC.

Law Office of  
LAUREN A. COLBY  
10 E. Fourth Street  
P.O. Box 113  
Frederick, MD 21705-0113

By:

  
Lauren A. Colby  
Its Attorney

**MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877

**ENGINEERING EXHIBIT EE-RM:**

**REPLY COMMENTS - MM DOC 01-62**

**RULE MAKING TO AMEND  
FM TABLE OF ALLOTMENTS**

**ALLOT CH. 278C3 TO EUTAW, AL  
RE-ALLOT CH. 282A TO MOUNDVILLE, AL**

**MAY 7, 2001**

**ENGINEERING STATEMENT PREPARED ON BEHALF OF  
JIM LAWSON COMMUNICATIONS, INC.  
LICENSEE OF WQZZ (FM)  
CHANNEL 282A - EUTAW, ALABAMA**

Facility ID: 31145

**ENGINEERING EXHIBIT EE-RM:**

**REPLY COMMENTS - MM DOC 01-62**

**RULE MAKING TO AMEND  
FM TABLE OF ALLOTMENTS**

**ALLOT CH. 278C3 TO EUTAW, AL  
RE-ALLOT CH. 282A TO MOUNDVILLE, AL**

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From City Ref. Point for Trussville, AL.

Figures 1 to 4 are contained in initial comments of  
Jim Lawson Communications.

## Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested by Jim Lawson Communications, Inc., to prepare the instant engineering exhibit in support of reply comments concerning a rule making petition to amend the FM Table of Allotments in MM Docket 01-62.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.



John J. Mullaney, Consulting Engineer

Executed on the 7th day of May 2001

**ENGINEERING EXHIBIT EE-RM:**

**REPLY COMMENTS - MM DOC 01-62**

**RULE MAKING TO AMEND  
FM TABLE OF ALLOTMENTS**

**ALLOT CH. 278C3 TO EUTAW, AL  
RE-ALLOT CH. 282A TO MOUNDVILLE, AL**

**NARRATIVE STATEMENT:**

This engineering statement has been prepared on behalf of Jim Lawson Communications, Inc. ("Lawson"), licensee of Radio Station WQZZ, at Eutaw, Alabama (Facility ID: 31145). The purpose of this statement is to provide engineering reply comments in support of a rule making petition to amend the FM Table of Allotments to (1) Allot Ch. 278C3 to Eutaw, Alabama and to (2) Delete Ch. 282A at Eutaw and re-allot Ch. 282A to Moundville, Alabama, and to modify the license of WQZZ to upgrade to Ch. 278C3 while remaining licensed to Eutaw, AL. The proposal to allot channel 278C3 to Eutaw is in direct conflict with a proposal contained in MM Docket 01-62 by WQEN to re-allot Ch. 279C/C1 at Gadsden, AL to Ch. 279C1 at Trussville, AL.

## **Capstar - Modified Original Proposal**

In its formal comments, Capstar modified its original proposal in several respects. However, only one of those modifications impacts the Lawson proposal. Originally Capstar proposed to move Ch. 288A at Tuscaloosa to 290A at Moundville, AL. It now seeks to move Ch. 288A at Tuscaloosa to Ch. 290C3 at Brookwood, AL. This modification by Capstar of its original proposal makes the proposal by Lawson to move Ch. 288A at Eutaw to 288A at Moundville a first local aural service.

## **Alternate Proposal for Trussville, AL**

The proposal by Lawson to allot Ch. 278C3 to Eutaw is in direct conflict with the Capstar proposal to move Ch. 279C1/C at Gadsden to 279C1 at Trussville. The proposed sites are just 123.5 km apart whereas the FCC rules require a separation of 144 km (20 km short spaced with rounding). The allowable area map (Figure 1) submitted by Lawson in its initial comments illustrates that its proposed 278C3 reference site is as close to its city of license (Eutaw) as is possible. In addition, it can be seen that it is impossible to site restrict 278C3 to the southwest so as to avoid the conflict with 279C1 at Trussville. At most the Eutaw site could be moved 2.8 km southwest before a new short spacing would result.

Figure 5 attached hereto is an allowable area map for Ch. 279C1 at Trussville. As can be seen, the site specified by Capstar is significantly

further from Trussville than the FCC minimum separations would require (20 km further than necessary). Thus, it is possible for the Trussville 279C1 allotment to be fully spaced to the Eutaw proposal at either the ALT-1 or ALT-2 sites depicted on the map. As depicted on the map, the ALT-1 site is short spaced with another counterproposal filed in Doc 01-62 requesting the allotment of 278A at New Hope, AL (in lieu of substituting 278A at Scottsboro, AL). Thus, it may be necessary to utilize the ALT-2 site if the New Hope proposal is adopted. Figures 6 & 7 are channel spacing studies from the ALT-1 & ALT-2 sites respectively.

N. Latitude:        33° 31' 10"    NAD-27    **ALT-1**  
W. Longitude:      86° 37' 50"

N. Latitude:        33° 23' 10"    NAD-27    **ALT-2**  
W. Longitude:      86° 35' 30"

Despite the potential short spacings with the proposed channels at Eutaw & New Hope it is still possible for Trussville to maintain a first service. Figure 8 is a channel spacing study for 279C2 (50 kW) from the city reference coordinates for Trussville, AL. As a C2 facility no short spacings would exist. The following coordinates are for the city of Trussville:

N. Latitude:        33° 37' 11"    NAD-27    **City**  
W. Longitude:      86° 36' 32"

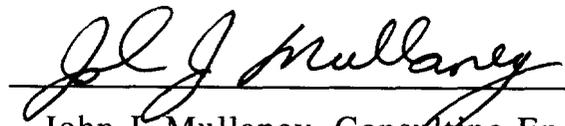
## SUMMARY

Jim Lawson Communications, Inc., licensee of Radio Station WQZZ, at Eutaw, Alabama requests that the FM Table of Allotments be amended to (1) Allot Ch. 278C3 to Eutaw, Alabama and to (2) Delete Ch. 282A at Eutaw and re-allot Ch. 282A to Moundville, Alabama, and to modify the license of WQZZ to upgrade to Ch. 278C3 while remaining licensed to Eutaw, AL.

The allotment of 282A to Moundville will now without any doubt be a first service given that Capstar no longer requests the allotment of 290A to Moundville.

The short spacing between 278C3 at Eutaw and 279C1 at Trussville can be solved by Trussville using a new reference site (ALT-1 or -2). In addition, it is possible to allot 279C2 to Trussville and eliminate all short spacings.

WQZZ believes that the proposed upgrade of the only aural service allotted to Eutaw and the allotment of a new FM first service to Moundville will result in a preferential arrangement of allotments and therefore, serves the public interest. If granted, WQZZ will quickly file a CP application for operation on 278C3 at Eutaw and when appropriate will file a construction permit application for 282A at Moundville.

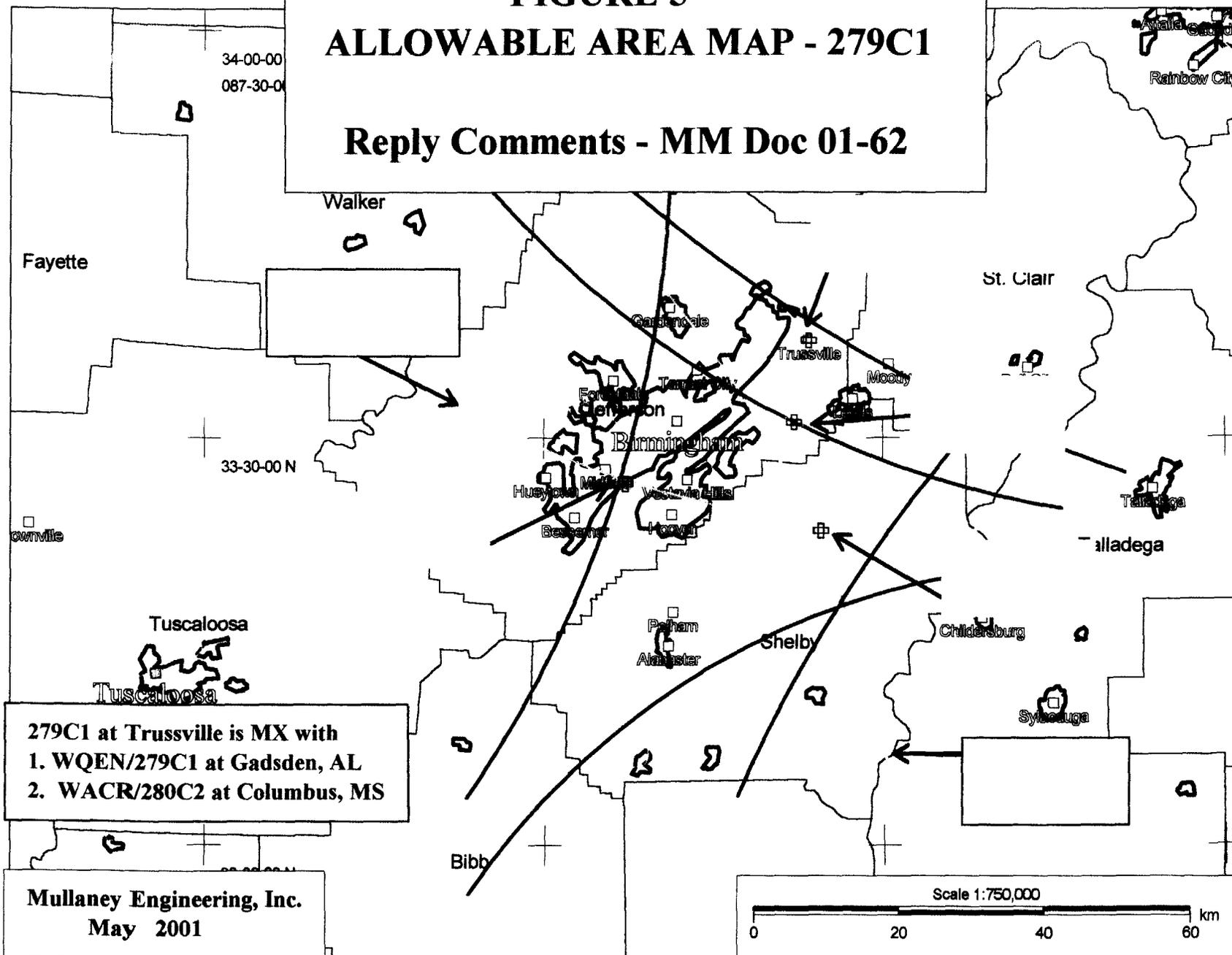


John J. Mullaney, Consulting Engineer

May 7, 2001.

**FIGURE 5  
ALLOWABLE AREA MAP - 279C1**

**Reply Comments - MM Doc 01-62**



ALT-1 279 C1 FR POLARIZATION ERP (KW) HAAT RCAMSL  
 TRUSSVILLE-ALT-C1 AL US HOR PLN BM TILT (METER) (METER)  
 33.3110 86.3750 (D.MMSS) 103.7 MHz HORIZONTAL 100.000 0.000 299.0 517.2  
 VERTICAL 100.000 0.000 299.0 517.2

THE FOLLOWING CONTOURS ARE CALCULATED USING: CALCULATED HAAT FROM TOPO DATA BASE  
 ERP= 100.000 (KW) 20.0 (DBK) HAAT= 299.0 (METERS)

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)	
					70 DBU	60 DBU
	DBU KM	DEGREES	(METERS)	(FEET)		
CO CHANNEL ( 40.0)	171.9	45.0	325.8	1069.0	51.8	74.3
1ST ADJACENT ( 54.0)	105.0	90.0	309.9	1016.6	50.7	73.1
2ND ADJACENT ( 80.0)	33.7	135.0	292.2	958.6	49.6	71.8
3RD ADJACENT (100.0)	10.1	180.0	279.3	916.2	48.7	70.7
		225.0	346.9	1138.2	53.1	75.9
PROTECTED ( 60.0)	72.3	270.0	293.4	962.5	49.6	71.9
		315.0	282.5	926.9	48.9	71.0
CITY GRADE ( 70.0)	50.0	AVERAGE	299.0	981.0	50.0	72.3

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AZIMUTH	LAT	LONG	ERP (KW)	HAAT D	IR	IC	REZLT					
FROM TO CALL STS	FILE NUMBER	CITY	ST C	(D.MMSS)	REL CHN	HORZ VERT	(M) A	MAP	DIST	RSEP	RSEP	IR IC
									***	(KM)	(KM)	(KM)
337.2 157.0 WEUP-F LIC	BLH000502AA	MOULTON	AL A	34.2708	87.0620	3RD 276C3	11.5H11.5V	150				112.4 76.
161.8 342.1 WMXS LIC	BLH890419KB	MONTGOMER	AL A	32.2411	86.1148	2ND 277C	100H 100V	334	X			130.3 105.
26.1 206.5 ADD	RMRAH10	SCOTTSBOR	AL A	34.3522	85.5931	1ST 278A	H V 0		X			132.5 133. s
176.3 356.4 WAAO-F LIC	BMLH900212KF	ANDALUSIA	AL A	31.2027	86.2802	CO 279A	3H 3V	100				242.1 200.
127.1 308.1 930701 APP	BPH930701ME	CUSSETA	GA A	32.1839	84.4545	CO 279A	6H 6V	100				220.2 200.
127.3 308.3 930701 APP	BPH930701MG	CUSSETA	GA A	32.1854	84.4644	CO 279A	2.8H 2.8V	145	X			218.7 200.
127.4 308.4 930701 VAC		CUSSETA	GA A	32.1818	84.4630	CO 279A	H V					219.7 200.
26.6 206.7 WQEN LIC	BLH980710KF	GADSDEN	AL A	33.4933	86.2646	CO 279C1	77H 77V	337				38.0 245. -
38.3 218.5 WQEN APP	BPH980713IA	GADSDEN	AL A	33.5711	86.1304	CO 279C	100H 100V	326				61.5 270. -
37.9 218.1 WQEN VAC		GADSDEN	AL A	33.5804	86.1235	CO 279C	H V					63.2 270. -
250.1 70.0 ADD	RMRAH10	TRUSSVILL	AL A	33.2638	86.5247	CO 279C1	H V					24.6 245. -
74.7 256.5 WPUP LIC	BLH920113KD	ROYSTON	GA A	34.1413	83.1603	CO 279C3	25H 25V	100				321.2 211.
73.5 255.3 ADD	RM9941	ARCADE	GA A	34.1509	83.2828	CO 279C3	H V					303.1 211.
30.7 211.5 ADD	RMRAH10	WALDEN	TN A	35.1432	85.2217	CO 279C3	H V		X			223.5 211.
265.3 84.5 WACR-F LIC	BLH961212KA	COLUMBUS	MS A	33.2427	88.0827	1ST 280C2	50H 50V	150	RM 01-62			140.9 158. S
282.8 101.8 ADD	RMRAH10	OKOLONA	MS A	33.5138	88.3044	1ST 280C2	H V		X			178.5 158.
239.3 58.7 WQZZ LIC	BMLH980806KC	EUTAW	AL A	32.5519	87.4908	3RD 282A	4.7H 4.7V	113				129.1 75.
240.8 60.2 WQZZ APP	BPH010402AA	EUTAW	AL A	32.5835	87.4636	3RD 282A	3.7B 3.7B	130				122.6 75.
356.1 176.1 WZYP LIC	BLH880510KB	ATHENS	AL A	34.4905	86.4416	3RD 282C	100H 100V	340				144.4 105.
240.1 59.3 WQZZ ADD	RM	EUTAW	AL A	32.5100	88.0000	1ST 278C3	H V		RM 01-62			147.7 144.
9.2 189.3 NEW ADD	RM	NEW HOPE	AL A	34.3450	86.2517	1ST 278A	H V		RM 01-62			119.3 133. S

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X - SEE MAP, FIGURE 5

<p><b>CHANNEL ALLOCATION STUDY FOR CH. 279C1. FROM                  ALT - 1 SPECIAL REF. POINT FOR TRUSSVILLE, AL</b></p> <p><b>REPLY COMMENTS MM DOC. 01-62</b></p>	<p><b>MULLANEY ENGINEERING, INC.                  GAITHERSBURG, MARYLAND</b></p> <p><b>FIGURE 6                  MAY 2001</b></p>
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ALT-2	279 C1	FR	POLARIZATION	ERP (KW)	HAAT	RCAMSL
TRUSSVILLE-ALT-C1 AL	US			HOR PLN	BM TILT	(METER)
33.2310	86.3530 (D.MMSS)	103.7 MHz	HORIZONTAL	100.000	0.000	299.0
			VERTICAL	100.000	0.000	497.0

THE FOLLOWING CONTOURS ARE CALCULATED USING: CALCULATED HAAT FROM TOPO DATA BASE  
 ERP= 100.000 (KW) 20.0 (DBK) HAAT= 299.0 (METERS)

INTERFERING	DOMESTIC		AZIMUTH	HAAT	HAAT	CONTOURS (KM)	
	DBU	KM	DEGREES	(METERS)	(FEET)	70 DBU	60 DBU
			0.0	236.9	777.2	45.7	67.2
CO CHANNEL ( 40.0)	171.9		45.0	268.2	880.1	47.9	69.8
1ST ADJACENT ( 54.0)	105.0	WQEN ALT-2 C1 SITE	90.0	326.8	1072.2	51.9	74.4
2ND ADJACENT ( 80.0)	33.7		135.0	343.2	1126.1	52.9	75.6
3RD ADJACENT (100.0)	10.1		180.0	328.1	1076.3	51.9	74.5
			225.0	311.7	1022.7	50.9	73.3
PROTECTED ( 60.0)	72.3		270.0	288.6	946.7	49.3	71.5
			315.0	288.5	946.5	49.3	71.5
CITY GRADE ( 70.0)	50.0		AVERAGE	299.0	981.0	50.0	72.3

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AZIMUTH	FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	LAT	LONG	REL	CHN	ERP (KW)	HAAT D	IR	IC	REZLT
								(D.MMSS)				HORZ VERT	(M) A	DIST	RSEP	IR IC
														(KM)	(KM)	(KM)
351.0	170.9	NEW	APP		BNPL010122AI	PINSON	AL A	33.4549	86.3950	IF	225L1	H V		42.4	20.	
161.2	341.5	WMXS	LIC		BLH890419KB	MONTGOMER	AL A	32.2411	86.1148	2ND	277C	100H 100V	334	115.1	105.	
22.3	202.6		ADD		RMRAH10	SCOTTSBOR	AL A	34.3522	85.5931	1ST	278A	H V	0	144.5	133.	
177.0	357.1	WAAO-F	LIC		BMLH900212KF	ANDALUSIA	AL A	31.2027	86.2802	CO	279A	3H 3V	100	227.1	200.	
124.5	305.5	930701	APP		BPH930701ME	CUSSETA	GA A	32.1839	84.4545	CO	279A	6H 6V	100	208.7	200.	
124.6	305.6	930701	APP		BPH930701MG	CUSSETA	GA A	32.1854	84.4644	CO	279A	2.8H 2.8V	145	207.1	200.	C
124.8	305.8	930701	VAC			CUSSETA	GA A	32.1818	84.4630	CO	279A	H V		208.1	200.	
15.4	195.5	WQEN	LIC		BLH980710KF	GADSDEN	AL A	33.4933	86.2646	CO	279C1	77H 77V	337	50.6	245.	-
28.7	208.9	WQEN	APP		BPH980713IA	GADSDEN	AL A	33.5711	86.1304	CO	279C	100H 100V	326	71.8	270.	-
28.5	208.8	WQEN	VAC			GADSDEN	AL A	33.5804	86.1235	CO	279C	H V		73.6	270.	-
283.6	103.4		ADD		RMRAH10	TRUSSVILL	AL A	33.2638	86.5247	CO	279C1	H V		27.5	245.	-
72.0	253.8	WPUP	LIC		BLH920113KD	ROYSTON	GA A	34.1413	83.1603	CO	279C3	25H 25V	100	321.9	211.	
70.6	252.4		ADD		RM9941	ARCADE	GA A	34.1509	83.2828	CO	279C3	H V		304.2	211.	
28.2	208.8		ADD		RMRAH10	WALDEN	TN A	35.1432	85.2217	CO	279C3	H V		234.5	211.	
336.2	155.2	WFGE	LIC		BLH870724KA	MURRAY	KY A	36.3258	88.1952	CO	279C1	100H 100V	201	385.2	245.	
271.4	90.5	WACR-F	LIC		BLH961212KA	COLUMBUS	MS A	33.2427	88.0827	1ST	280C2	50H 50V	150	144.1	158.	S
287.1	106.0		ADD		RMRAH10	OKOLONA	MS A	33.5138	88.3044	1ST	280C2	H V		185.8	158.	
246.0	65.4	WQZZ	LIC		BMLH980806KC	EUTAW	AL A	32.5519	87.4908	3RD	282A	4.7H 4.7V	113	125.5	75.	
247.9	67.2	WQZZ	APP		BPH010402AA	EUTAW	AL A	32.5835	87.4636	3RD	282A	3.7B 3.7B	130	119.5	75.	
355.2	175.1	WZYP	LIC		BLH880510KB	ATHENS	AL A	34.4905	86.4416	3RD	282C	100H 100V	340	159.4	105.	
245.9	65.2	WQZZ	ADD	RM		EUTAW	AL A	32.5100	88.0000	1ST	278C3	H V		144.3	144.	
6.7	186.8	NEW	ADD	RM		NEW HOPE	AL A	34.3450	86.2517	1ST	278A	H V		133.4	133.	C

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<b>CHANNEL ALLOCATION STUDY FOR CH. 279C1. FROM                  ALT - 2 SPECIAL REF. POINT FOR TRUSSVILLE, AL</b>	<b>MULLANEY ENGINEERING, INC.                  GAITHERSBURG, MARYLAND</b>
REPLY COMMENTS MM DOC. 01-62	FIGURE 7 MAY 2001

ALT-C2	279 C2	FR	POLARIZATION	ERP (KW)	HAAT	RCAMSL
TRUSSVILLE-ALT-C2 AL	US			HOR PLN	BM TILT	(METER)
33.3711	86.3632	(D.MMSS)	103.7 MHz	HORIZONTAL	50.000	0.000
				VERTICAL	50.000	0.000
					150.0	385.0
					150.0	385.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

ERP= 50.000 (KW) 17.0 (DBK) HAAT= 150.0 (METERS)

CALCULATED HAAT FROM TOPO DATA BASE

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)	
	DBU KM	DEGREES	(METERS)	(FEET)	70 DBU	60 DBU
		0.0	88.2	289.3	25.6	42.6
CO CHANNEL { 40.0}	137.7	45.0	122.8	402.7	29.7	48.4
1ST ADJACENT { 54.0}	78.1	90.0	167.2	548.5	34.5	54.3
2ND ADJACENT { 80.0}	19.9	135.0	165.1	541.6	34.2	54.1
3RD ADJACENT {100.0}	6.0	180.0	189.1	620.5	36.5	56.4
		225.0	143.6	471.2	31.9	51.3
PROTECTED { 60.0}	52.2	270.0	161.6	530.3	33.9	53.7
		315.0	162.4	532.8	34.0	53.8
CITY GRADE { 70.0}	32.6	AVERAGE	150.0	492.1	32.6	52.2

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AZIMUTH	LAT	LONG	ERP (KW)	HAAT D	IR	IC	REZLT	
FROM TO CALL STS	FILE NUMBER	CITY	ST C	(D.MMSS)	REL CHN	HORZ VERT	(M) A	
333.8 153.6 WEUP-F LIC	BLH000502AA	MOULTON	AL A	34.2708	87.0620	3RD 276C3	11.5H11.5V 150	103.1 56.
164.0 344.3 WMXS LIC	BLH890419KB	MONTGOMER	AL A	32.2411	86.1148	2ND 277C	100H 100V 334	140.3 105.
27.6 208.0 ADD	RMRAH10	SCOTTSBOR	AL A	34.3522	85.5931	1ST 278A	H V	121.7 106.
177.0 357.0 WAAO-F LIC	BMLH900212KF	ANDALUSIA	AL A	31.2027	86.2802	CO 279A	3H 3V 100	253.1 166.
129.7 310.7 930701 APP	BPH930701ME	CUSSETA	GA A	32.1839	84.4545	CO 279A	6H 6V 100	225.5 166.
129.9 310.9 930701 APP	BPH930701MG	CUSSETA	GA A	32.1854	84.4644	CO 279A	2.8H 2.8V 145	224.1 166.
130.0 311.0 930701 VAC		CUSSETA	GA A	32.1818	84.4630	CO 279A	H V	225.1 166.
33.3 213.3 WQEN LIC	BLH980710KF	GADSDEN	AL A	33.4933	86.2646	CO 279C1	77H 77V 337	27.4 224.
44.2 224.4 WQEN APP	BPH980713IA	GADSDEN	AL A	33.5711	86.1304	CO 279C	100H 100V 326	51.8 249.
43.5 223.7 WQEN VAC		GADSDEN	AL A	33.5804	86.1235	CO 279C	H V	53.4 249.
232.2 52.0 ADD	RMRAH10	TRUSSVILL	AL A	33.2638	86.5247	CO 279C1	H V	31.8 224.
31.8 212.5 ADD	RMRAH10	WALDEN	TN A	35.1432	85.2217	CO 279C3	H V	212.9 177.
261.0 80.1 WACR-F LIC	BLH961212KA	COLUMBUS	MS A	33.2427	88.0827	1ST 280C2	50H 50V 150	144.3 130.
270.3 89.4 WACR-F USE		COLUMBUS	MS A	33.3700	88.1225	1ST 280C2	H V	148.3 130.
279.2 98.1 ADD	RMRAH10	OKOLONA	MS A	33.5138	88.3044	1ST 280C2	H V	178.4 130.
355.0 174.9 WZYP LIC	BLH880510KB	ATHENS	AL A	34.4905	86.4416	3RD 282C	100H 100V 340	133.5 105.
236.9 56.1 WQZZ ADD	RM	EUTAW	AL A	32.5100	88.0000	1ST 278C3	H V	RM 01-62 155.2 117.
9.1 189.2 NEW ADD	RM	NEW HOPE	AL A	34.3450	86.2517	1ST 278A	H V	RM 01-62 108.0 106. C

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<b>CHANNEL ALLOCATION STUDY FOR CH. 279C2. FROM                  CITY REF. POINT FOR TRUSSVILLE, AL</b>	<b>MULLANEY ENGINEERING, INC.                  GAITHERSBURG, MARYLAND</b>
REPLY COMMENTS MM DOC. 01-62	FIGURE 8 MAY 2001

CERTIFICATE OF SERVICE

I, Traci Maust, a secretary in the law office of Lauren A. Colby, do hereby certify that copies of the foregoing have been sent via first class, U.S. mail, postage prepaid, this 8<sup>th</sup> day of May, 2001, to the offices of the following:

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