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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 00-31
Table of Allotments,)	RM-9815
FM Broadcast Stations)	RM-10014
(Nogales, Vail and Patagonia, Arizona))	RM-10095

To: The Chief, Allocations Branch

OPPOSITION TO MOTION TO STRIKE

Arizona Lotus Corp. ("Lotus") and McMurray Communications, Inc. ("McMurray"), by their undersigned attorneys, oppose the Motion to Strike Comments of Arizona Lotus Corp. and McMurray Communications, Inc. filed by Desert West Air Ranchers Corporation ("DWAR").

1. Lotus, the successful bidder in FM Auction 25 for the construction permit for Channel 270A, Oro Valley, Arizona, is permittee of Station KCMT (FM), which is operating on Channel 270A, Oro Valley pursuant to Program Test Authority. Lotus has made a one-step application to the Commission (File No. BPMH-20010110AAN) (the "Lotus Application") for authorization to upgrade KCMT's facilities to Channel 271C1, Oro Valley.

2. McMurray is the licensee of Station KWRQ, Clifton, Arizona. McMurray has made a one-step application to the Commission (File No. BPMH-20010110AAM) (the “McMurray Application”) for authorization to change KWRQ’s facilities to Channel 272C1, Clifton. The McMurray and Lotus Applications are contingent upon each other.¹

3. The Comments filed by Lotus and McMurray that are the subject of DWAR’s Motion to Strike had the limited purpose of suggesting that the Commission add Channel 267A to Vail, Arizona in lieu of Channel 272A, one of two channels suggested by DWAR in its December 20, 2000 Reply Comments to Big Broadcasting of Arizona, LLC. Lotus and McMurray suggested Channel 267A because allotting Channel 272A to Vail would conflict with the Lotus and McMurray Applications. Channel 267A, like Channel 283A, creates no such conflict.

4. The Motion to Strike asserts at ¶2 that there is no reason to entertain the suggestion to add Channel 267A to Vail because DWAR had also suggested adding Channel 283A to Vail. Lotus and McMurray have already stated at note 4 of their Comments that they would accept allotting Channel 283A to Vail in lieu of Channel 272A. But there is no way of knowing whether the Commission will allot Channel 283A to Vail instead of Channel 272A. Lotus and McMurray have suggested Channel 267A out of an abundance of caution to accommodate their applications. The Lotus and McMurray suggestion of Channel 267A is entirely consistent with Commission practice as set forth in ¶6 of their Comments.

¹ Lotus and McMurray have filed a Petition for Reconsideration of the April 30 ruling by the Audio Services Division returning the Lotus and McMurray Applications upon the ground that the Lotus Application erroneously responded “Not Applicable” to an Item in the Tech Box on Form 301. The Petition for Reconsideration demonstrates that the “Not Applicable” response was accurate in view of the specifics of the Lotus Application.

5. The Motion to Strike next asserts that adding Channel 267A to Vail conflicts with the Petition for Rule Making filed by Cochise Broadcasting, LLC (the “Cochise Petition”), assignee of Station KKYZ, Channel 269A, Sierra Vista, Arizona, to change the community of license and channel to Channel 267C3, St. David, Arizona. As set forth in the Motion by Arizona Lotus Corp. and McMurray Communications, Inc. to Dismiss Petition by Cochise Broadcasting, LLC to Amend Table of Allotments, attached hereto as Exhibit 1 (the “Motion to Dismiss”) and incorporated by reference, the Cochise Petition is technically defective and should therefore not be considered.

6. Moreover, the Cochise Petition is not timely to preclude the addition of Channel 267A to Vail in this proceeding. Channel 267A, just like Channels 272A and 283A as suggested by DWAR, resolves the conflict between (i) DWAR’s proposal to substitute Channel 253A, Vail for Channel 252A, Nogales, Arizona, and (ii) Big Broadcasting of Arizona, LLC’s (“BBA”) counterproposal to add Channel 253A to Vail with a site limitation that would protect Channel 252A in Nogales. Accordingly, Channel 267A is within the scope of the February 25, 2000 Notice of Proposed Rule Making in this proceeding.² Commission precedent therefore requires that the Cochise Petition be dismissed because of its conflict with the addition of Channel 267A to Vail. Pinewood, SC, 5 FCC Rcd 7609 (1990)).

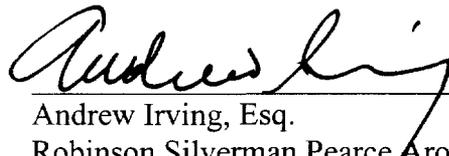
² In fact, another party to this proceeding, REC Networks had suggested assigning Channel 267A to Vail in its Comments filed on April 12, 2000. REC withdrew the suggestion because it favored the BBA counterproposal, not because of any technical flaws in a potential allotment of Channel 267A to Vail.

7. Finally, the Motion to Strike asserts that Channel 267A cannot be added to Vail because it is short-spaced to an application by Cochise (File No. 20001023AEO) to upgrade Station KKYZ from Channel 269A to Channel 269C2, Sierra Vista (the “Sierra Vista Application”). The Engineering Statement attached to the Comments demonstrates that Channel 272A at Vail, suggested by DWAR, is just as short-spaced to the Sierra Vista Application as is Channel 267A at Vail. There is no logical reason for finding that short-spacing of the Sierra Vista Application to Channel 272A at Vail is acceptable but identical short-spacing to Channel 267A at Vail is not. In any event, the Engineering Statement attached hereto demonstrates that allotment coordinates are available at Vail from which Channel 267A will satisfy the spacing requirements of Section 73.207 of the Commission’s Rules.

8. The Motion to Strike should be denied and the Comments should be accepted so that, in the event Channel 283A is not substituted for Channel 272A at Vail, Channel 267A would be so substituted..

Dated: July 5, 2001

Respectfully submitted,



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**EXHIBIT E
ENGINEERING STATEMENT
RE: OPPOSITION TO
MOTION TO STRIKE
AND MOTION TO DISMISS
PETITION TO AMEND
TABLE OF ALLOTMENTS**

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Prepared by
Lohnes and Culver Washington, D.C.
July, 2001

**EXHIBIT E
ENGINEERING STATEMENT
RE: OPPOSITION TO MOTION TO STRIKE
AND MOTION TO DISMISS
PETITION TO AMEND
TABLE OF ALLOTMENTS**

INTRODUCTION

This statement was prepared on behalf of Arizona Lotus Corp. ("Lotus") licensee of FM broadcast station KCMT Channel 270A Oro Valley, AZ and McMurray Communications, Inc. ("McMurray") licensee of FM broadcast station KWRQ Channel 271C1 Clifton, AZ. Lotus and McMurray have contingent applications pending at the Commission, proposing a channel change and upgrade of KCMT to Channel 271C1 and a channel change of KWRQ to Channel 272C1. Subsequent to the filing of the contingent applications, Lotus and McMurray discovered that the Allocations Branch of the Federal Communications Commission was considering the proposed addition of Channel 272A to Vail, AZ in a Rule Making proceeding in Docket No. 00-31. Since the addition of 272A to Vail, AZ would preclude a grant of the Lotus-McMurray contingent applications, allocation studies were conducted in search of an alternate channel to serve Vail, AZ. Accordingly, Lotus and McMurray submitted supplemental comments in Docket No. 00-31 demonstrating that Channel 267A can be assigned to Vail in lieu of 272A.

Desert West Air Ranchers Corporation ("Desert West"), the proponent who initiated the proposed Rule Making in Docket No. 00-31 filed a Motion to Strike the comments filed by Lotus and McMurray citing two reasons the proposed substitution of 267A for 272A at Vail should be denied. One of those reasons refers to a Rule Making petition to amend the Table of Allotments to substitute Channel 267C3 at Saint David, AZ for Channel 269A at Sierra Vista, AZ. The other reason is a spacing deficiency with respect to an application

to upgrade station KKYZ(FM), Sierra Vista, from Channel 269A to Channel 269C2. This statement provides a technical analysis demonstrating that: 1) the proposal to develop a Class C3 operation at a specified location to bring a first local service to Saint David, AZ is invalid and will not work and 2) the spacing deficiency between the Channel 267A reference coordinates in Vail and the antenna site coordinates of the KKYZ Channel 269C2 upgrade application can easily be rectified by using a different set of coordinates for the reference site in Vail.

PROPOSED ALLOTMENT OF CHANNEL 267C3

The Motion to Strike filed by Desert West refers to a petition for Rule Making filed by Cochise Broadcasting, LLC, licensee of FM broadcast station KKYZ to change the community of license of KKYZ from Sierra Vista, AZ to Saint David, AZ and upgrade the facility from Channel 269A to Channel 267C3. The justification for the proposed change in community of license is to bring a first local service to Saint David, AZ. The Cochise petition specifies a site to the nearest one tenth of a second at a location that is approximately 16 kilometers west of Saint David. An allocation study attached to the petition shows the proposed site is significantly short-spaced with a Mexican allotment on Channel 267B at Agua Prieta, Sonora. In fact the actual site-to-site separation is 103.8 km while the required separation to avoid interference is 211 km. A Class C3 FM broadcast station based on the reference antenna height of 100 meters AAT has a maximum ERP of 25 kW or a minimum ERP 6.1 kW.

An analysis of the Class C3 proposal for the proposed site toward the short-spaced Mexican allotment shows significant overlap of the Mexican protected contour at the minimum Class C3 minimum power level of 6.1 kW. In fact in order to provide contour protection to the Mexican Class B allotment in accordance with the U.S./Mexican agreement, the maximum ERP at 100 meters AAT at the on-line bearing between the proposed site and the Mexican allotment would be limited to approximately 20 watts.

Attached as Figure 1 is a map showing the protected contour of the Mexican allotment on Channel 267B (54 dBu) and the interfering contour (34 dBu) of the proposed Channel 267C3 operation at Saint David with power levels of 25 kW (maximum) 6 kW (minimum) and 20 watts. As shown on Figure 1, a Channel 267 operation from the site specified in the Cochise petition will have to be limited to an ERP of 20 watts in the direction of the protected contour of the Mexican allotment in order to comply with the protection requirements of the U.S./Mexican agreement. With a minimum ERP of 20 watts, the maximum power employing a conforming directional antenna with a max to min ratio of 15 dB, as required by Section 73.316(b)(1) of the Commission's Rules, would be 632 watts, or far below the minimum acceptable power of 6.1 kW for a Class C3 operation. As stated above, the site proposed by Cochise is approximately 16 km west of Saint David which will require an ERP of approximately 6 kW at 100 M AAT in order to provide 70 dBu or City Grade service over Saint David, as required by Section 73.315(a) of the Commission's Rules. The 267C3 proposal: 1) cannot be developed in compliance with the Commission's Rules, 2) cannot be developed in compliance with the U.S./Mexican agreement and 3) cannot provide City Grade service to Saint David.

CHANNEL 267A AT VAIL

The second reason argued by Desert West in the Motion to Strike cites a short-spacing between the reference site coordinates for Channel 267A in Vail, AZ and the coordinates of a proposed cut-off application for Channel 269C2 for KKYZ at Sierra Vista. The reference coordinates of Vail are short-spaced with the application coordinates of the 73.215 application filed by KKYZ but are fully spaced with the allotment coordinates of the two site proposal. There are coordinates, however, from which the separation can be met and from which City Grade service can be provided to Vail on Channel 267A. In fact, the Commission's CDBS contains a record noting a Rule Making in Docket No. 00-31 to assign Channel 267A to Vail at a set of coordinates that meet the separation requirement with

respect to the KKYZ application site and can comply with the City Grade service requirement since the site is less than 5 km from Vail.

Attached as Figure 2 are the results of an allocation study of Channel 267A at the site coordinates noted for the proposed addition of Channel 267A to Vail as shown in the CDBS.

CONCLUSION

Based on an engineering analysis of the proposed change in community of license and channel by KKYZ from Channel 269A to 267C3 it is obvious that the proposal is flawed and can never be developed as proposed. Accordingly, the Rule Making Petition filed by Cochise should be dismissed. In addition the spacing deficiency with respect to the KKYZ Channel 269C2 upgrade application is not an issue since it can easily be rectified with a slight change in reference coordinates. Therefore, the reasons given in support of the Motion to Strike by Desert West have no substance and should be summarily dismissed.

Respectfully submitted,
LOHNES AND CULVER



Frederick D. Veihmeyer

July, 2001

**FIGURE 2
FM ALLOCATION STUDY
RE: PROPOSED ADDITION OF
CHANNEL 267A TO VAIL, ARIZONA
REFERENCE COORDINATES 32° 04' 58" 110° 44' 17"**

<u>CHANNEL</u>	<u>STATION</u>			<u>DISTANCE SEPARATION IN KM</u>	
	<u>CALL</u>	<u>CLASS</u>	<u>CITY, STATE</u>	<u>ACTUAL⁽¹⁾</u>	<u>REQUIRED⁽²⁾</u>
213	KUAT-FM	C	Tucson, AZ.	37	29
214	No stations within required separation plus 50 kilometers				
264	No stations within required separation plus 50 kilometers				
265	KZMK	A	Sierra Vista, AZ.	74	31
266	ALLOC ⁽³⁾	B	Sasabe, SO.	103 ⁽⁴⁾	113
267	ALLOC ⁽³⁾	B	Agua Prieta, SO.	141 ⁽⁴⁾	178
268	KZON	C	Phoenix, AZ.	186	165
269	KKYZ(APP) ⁽⁵⁾	C2	Sierra Vista, AZ.	55	55
269	KKYZ(APP) ⁽⁶⁾	C2	Sierra Vista, AZ.	75	55
270	KCMT(CP)	A	Oro Valley, AZ.	35	31

- Notes:
- (1) Calculated distance separation between stations in accordance with Section 73.208 of the FCC Rules.
 - (2) Required minimum distance separation between stations per Section 73.207 of the FCC Rules.
 - (3) Vacant Mexican Allotment.
 - (4) Mileage separation deficiencies.
 - (5) KKYZ antenna site.
 - (6) KKYZ allotment site.

**Before the
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In the Matter of)	
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Amendment of Section 73.202(b))	MM Docket No. _____
Table of Allotments,)	RM- _____
FM Broadcast Stations)	
(Sierra Vista and Saint David, Arizona))	

To: The Chief, Allocations Branch

MOTION BY ARIZONA LOTUS CORP. AND MCMURRAY COMMUNICATIONS, INC. TO DISMISS PETITION BY COCHISE BROADCASTING, LLC TO AMEND TABLE OF ALLOTMENTS

Arizona Lotus Corp. (“Lotus”) and McMurray Communications, Inc.

(“McMurray”), by their undersigned attorneys, hereby move to dismiss the Petition for Rule Making filed by Cochise Broadcasting, LLC (“Cochise”) to amend Section 73.202(b), Table of Allotments, to substitute Channel 267C3, St. David, Arizona, for Channel 269A, Sierra Vista, Arizona (the “Cochise Petition”), in contemplation of an application to modify Station KKYZ (FM), Channel 269A, Sierra Vista, to operate on Channel 267C3, St. David. As set forth below, the Cochise Petition is technically deficient and is intended solely to impede Lotus’ efforts to upgrade Station KCMT (FM), Oro Valley, Arizona, from Channel 270A to Channel 271C1.

1. Lotus, the successful bidder in FM Auction 25 for the construction permit for Channel 270A, Oro Valley, Arizona, is permittee of Station KCMT (FM), which is operating on Channel 270A, Oro Valley, pursuant to Program Test Authority. Lotus has made a one-step

application to the Commission (File No. BPMH-20010110AAN) (the “Lotus Application”) for authorization to upgrade KCMT’s facilities to Channel 271C1, Oro Valley.

2. McMurray is the licensee of Station KWRQ (FM), Clifton, Arizona. McMurray has made a one-step application to the Commission (File No. BPMH-20010110AAM) (the “McMurray Application”) for authorization to change KWRQ’s facilities to Channel 272C1, Clifton. The McMurray and Lotus Applications are contingent upon each other.¹

Background

3. The Cochise Petition proposes to substitute Channel 267C3, St. David, Arizona, for Channel 269A, Sierra Vista, Arizona. Cochise also has a pending application (BPH-20001023AEO) to modify the Sierra Vista facility Station KKYZ from Channel 269A, Sierra Vista, to Channel 269C2, Sierra Vista.

4. Lotus and McMurray have an interest in the Cochise Petition because Desert West Air Ranchers, Inc. (“DWAR”) has relied on the Cochise Petition in its motion in MM Docket No. 00-31 (Nogales, Vail and Patagonia, Arizona) (the “Vail proceeding”) to strike the Comments filed by Lotus and McMurray in the Vail proceeding suggesting that the Commission allocate Channel 267A to Vail in lieu of Channel 272A. DWAR had suggested (but not formally proposed) adding either Channel 283A or 272A to Vail in the Vail proceeding in order to resolve a conflict between DWAR’s proposal and another party’s counterproposal in the

¹ Lotus and McMurray have filed a Petition for Reconsideration of the April 30 ruling by the Audio Services Division returning the Lotus and McMurray Applications upon the ground that the Lotus Application erroneously responded “Not Applicable” to an Item in the Tech Box on Form 301. The Petition for Reconsideration demonstrates that the “Not Applicable” response was accurate in view of the specifics of the Lotus Application.

Vail proceeding While Lotus and McMurray would accept allocating Channel 283A to Vail, adding Channel 272A to Vail would conflict with the Lotus Application proposing an upgrade of KCMT (FM) to Channel 271C1, Oro Valley and the McMurray Application to change KWRQ (FM)'s facilities to Channel 272C1, Clifton. Lotus and McMurray's Comments in the Vail proceeding suggested adding Channel 267A to Vail to accommodate the Lotus and McMurray Applications in the event the Commission was not inclined to add Channel 283A to Vail in lieu of Channel 272A. The DWAR Motion to Strike relies on both the Cochise application to upgrade Station KKYZ (FM) to Channel 269C2, Sierra Vista, and the Cochise Petition to add Channel 267C3 to St. David to oppose Lotus' suggestion to add Channel 267A rather than Channel 272A to Vail.

The Cochise Petition is Technically Defective

5. The attached Engineering Statement demonstrates that service on Channel 267C3 at St. David is severely short-spaced to a vacant allotment of Channel 267 at Agua Prieta, Sonora, Mexico (the "Mexican allotment"). The Mexican allotment can only be protected by reducing the ERP of a station on Channel 267C3 at St. David to 632 watts, well below the minimum power for a Class C3 station under Section 73.211(a) of the Commission's Rules. And at that power level, city-grade service cannot be provided over St. David, the proposed community of license, as required by Section 73.315 of the Commission's Rules.

6. Moreover, the Cochise Petition conflicts with the potential addition of Channel 267A to Vail in the Vail proceeding. Channel 267A, just like Channels 272A and 283A as suggested by DWAR, resolves the conflict between (i) DWAR's proposal to substitute Channel 253A, Vail for Channel 252A, Nogales, Arizona, and (ii) Big Broadcasting of Arizona, LLC's ("BBA") counterproposal to add Channel 253A to Vail with a site limitation that would

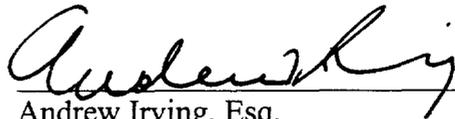
protect Channel 252A in Nogales. Accordingly, Channel 267A is within the scope of the February 25, 2000 Notice of Proposed Rule Making in the Vail proceeding.² Commission precedent therefore requires that the Cochise Petition be dismissed because of its conflict with the addition of Channel 267A to Vail, which appears in the CDBS database as allocated to Vail. Pinewood, SC, 5 FCC Rcd 7609 (1990).

Conclusion

7. The Petition is technically defective and should be dismissed.

Dated: July 5, 2001

Respectfully submitted,



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Attorneys for McMurray
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² In fact, another party to this proceeding, REC Networks had suggested assigning Channel 267A to Vail in its Comments filed on April 12, 2000. REC withdrew the suggestion because it favored the BBA counterproposal, not because of any technical flaws in a potential allotment of Channel 267A to Vail.

**EXHIBIT E
ENGINEERING STATEMENT
RE: OPPOSITION TO
MOTION TO STRIKE
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Desert West Air Ranchers Corporation ("Desert West"), the proponent who initiated the proposed Rule Making in Docket No. 00-31 filed a Motion to Strike the comments filed by Lotus and McMurray citing two reasons the proposed substitution of 267A for 272A at Vail should be denied. One of those reasons refers to a Rule Making petition to amend the Table of Allotments to substitute Channel 267C3 at Saint David, AZ for Channel 269A at Sierra Vista, AZ. The other reason is a spacing deficiency with respect to an application

to upgrade station KKYZ(FM), Sierra Vista, from Channel 269A to Channel 269C2. This statement provides a technical analysis demonstrating that: 1) the proposal to develop a Class C3 operation at a specified location to bring a first local service to Saint David, AZ is invalid and will not work and 2) the spacing deficiency between the Channel 267A reference coordinates in Vail and the antenna site coordinates of the KKYZ Channel 269C2 upgrade application can easily be rectified by using a different set of coordinates for the reference site in Vail.

PROPOSED ALLOTMENT OF CHANNEL 267C3

The Motion to Strike filed by Desert West refers to a petition for Rule Making filed by Cochise Broadcasting, LLC, licensee of FM broadcast station KKYZ to change the community of license of KKYZ from Sierra Vista, AZ to Saint David, AZ and upgrade the facility from Channel 269A to Channel 267C3. The justification for the proposed change in community of license is to bring a first local service to Saint David, AZ. The Cochise petition specifies a site to the nearest one tenth of a second at a location that is approximately 16 kilometers west of Saint David. An allocation study attached to the petition shows the proposed site is significantly short-spaced with a Mexican allotment on Channel 267B at Agua Prieta, Sonora. In fact the actual site-to-site separation is 103.8 km while the required separation to avoid interference is 211 km. A Class C3 FM broadcast station based on the reference antenna height of 100 meters AAT has a maximum ERP of 25 kW or a minimum ERP 6.1 kW.

An analysis of the Class C3 proposal for the proposed site toward the short-spaced Mexican allotment shows significant overlap of the Mexican protected contour at the minimum Class C3 minimum power level of 6.1 kW. In fact in order to provide contour protection to the Mexican Class B allotment in accordance with the U.S./Mexican agreement, the maximum ERP at 100 meters AAT at the on-line bearing between the proposed site and the Mexican allotment would be limited to approximately 20 watts.

Attached as Figure 1 is a map showing the protected contour of the Mexican allotment on Channel 267B (54 dBu) and the interfering contour (34 dBu) of the proposed Channel 267C3 operation at Saint David with power levels of 25 kW (maximum) 6 kW (minimum) and 20 watts. As shown on Figure 1, a Channel 267 operation from the site specified in the Cochise petition will have to be limited to an ERP of 20 watts in the direction of the protected contour of the Mexican allotment in order to comply with the protection requirements of the U.S./Mexican agreement. With a minimum ERP of 20 watts, the maximum power employing a conforming directional antenna with a max to min ratio of 15 dB, as required by Section 73.316(b)(1) of the Commission's Rules, would be 632 watts, or far below the minimum acceptable power of 6.1 kW for a Class C3 operation. As stated above, the site proposed by Cochise is approximately 16 km west of Saint David which will require an ERP of approximately 6 kW at 100 M AAT in order to provide 70 dBu or City Grade service over Saint David, as required by Section 73.315(a) of the Commission's Rules. The 267C3 proposal: 1) cannot be developed in compliance with the Commission's Rules, 2) cannot be developed in compliance with the U.S./Mexican agreement and 3) cannot provide City Grade service to Saint David.

CHANNEL 267A AT VAIL

The second reason argued by Desert West in the Motion to Strike cites a short-spacing between the reference site coordinates for Channel 267A in Vail, AZ and the coordinates of a proposed cut-off application for Channel 269C2 for KKYZ at Sierra Vista. The reference coordinates of Vail are short-spaced with the application coordinates of the 73.215 application filed by KKYZ but are fully spaced with the allotment coordinates of the two site proposal. There are coordinates, however, from which the separation can be met and from which City Grade service can be provided to Vail on Channel 267A. In fact, the Commission's CDBS contains a record noting a Rule Making in Docket No. 00-31 to assign Channel 267A to Vail at a set of coordinates that meet the separation requirement with

respect to the KKYZ application site and can comply with the City Grade service requirement since the site is less than 5 km from Vail.

Attached as Figure 2 are the results of an allocation study of Channel 267A at the site coordinates noted for the proposed addition of Channel 267A to Vail as shown in the CDBS.

CONCLUSION

Based on an engineering analysis of the proposed change in community of license and channel by KKYZ from Channel 269A to 267C3 it is obvious that the proposal is flawed and can never be developed as proposed. Accordingly, the Rule Making Petition filed by Cochise should be dismissed. In addition the spacing deficiency with respect to the KKYZ Channel 269C2 upgrade application is not an issue since it can easily be rectified with a slight change in reference coordinates. Therefore, the reasons given in support of the Motion to Strike by Desert West have no substance and should be summarily dismissed.

Respectfully submitted,
LOHNES AND CULVER



Frederick D. Veihmeyer

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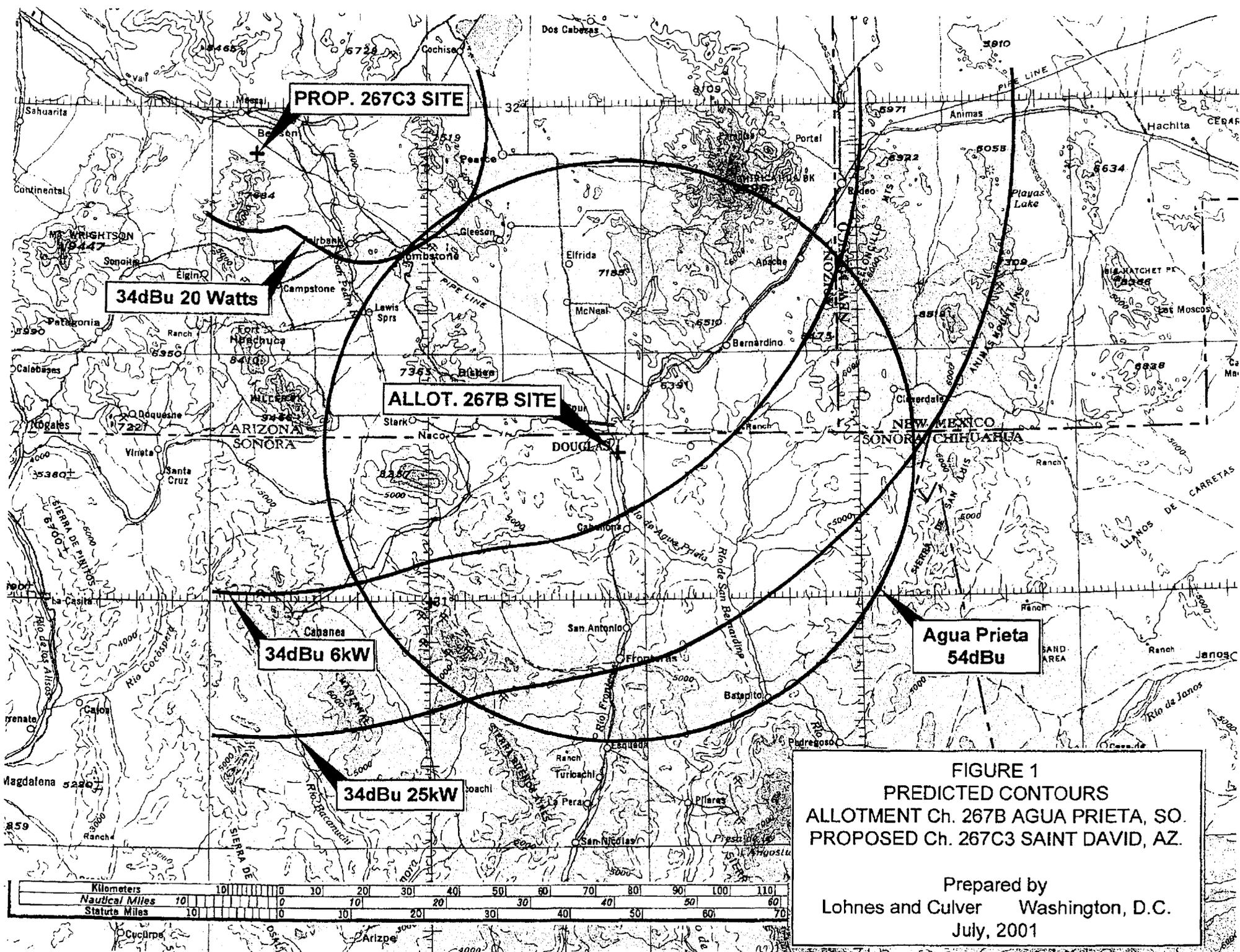


FIGURE 1
PREDICTED CONTOURS
ALLOTMENT Ch. 267B AGUA PRIETA, SO.
PROPOSED Ch. 267C3 SAINT DAVID, AZ.

Prepared by
 Lohnes and Culver Washington, D.C.
 July, 2001

**FIGURE 2
FM ALLOCATION STUDY
RE: PROPOSED ADDITION OF
CHANNEL 267A TO VAIL, ARIZONA
REFERENCE COORDINATES 32° 04' 58" 110° 44' 17"**

<u>CHANNEL</u>	<u>STATION</u>		<u>CITY, STATE</u>	<u>DISTANCE SEPARATION IN KM</u>	
	<u>CALL</u>	<u>CLASS</u>		<u>ACTUAL⁽¹⁾</u>	<u>REQUIRED⁽²⁾</u>
213	KUAT-FM	C	Tucson, AZ.	37	29
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- Notes:
- (1) Calculated distance separation between stations in accordance with Section 73.208 of the FCC Rules.
 - (2) Required minimum distance separation between stations per Section 73.207 of the FCC Rules.
 - (3) Vacant Mexican Allotment.
 - (4) Mileage separation deficiencies.
 - (5) KKYZ antenna site.
 - (6) KKYZ allotment site.

CERTIFICATE OF SERVICE

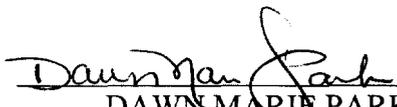
I, DAWN MARIE PARKES, a secretary in the law offices of Robinson Silverman Pearce Aronsohn & Berman LLP, do hereby certify that on this 5th day of July, 2001, I have caused to be mailed, via first-class mail, a copy of the foregoing Opposition to Motion to Strike of Arizona Lotus Corp. and McMurray Communications, Inc. to the following:

Ms. Nancy V. Joyner
Mass Media Bureau
Federal Communications Commission
The Portals
445 Twelfth Street, S.W., Room 3-A267
Washington, D.C. 20554
*** Via Federal Express**

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DAWN MARIE PARKES