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November 3, 2000

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

Dear Secretary:

Enclosed are my comments as the petitioner in connect with proposed Rule Making as listed below with an original and four copies of separate comments for the four communities:

Heber, Arizona	MM Docket No. 00-189	RM-9984
✓ Snowflake, A	MM Docket No. 00-190	RM-9985
Overgaard, AZ	MM Docket No. 00-191	RM-9986
Taylor, AZ	MM Docket No. 00-192	RM-9987

If there are any questions please contact me at 970-353-6522, my office in Greeley, CO.

Thank you,



Robert D. Zellmer
President & Director of Engineering
New Directions Media, Inc.
P.O. Box 1643
Greeley, CO 80632

3-111

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

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In the Matter of)
)
Amendment of Section 73.202(b),)
FM Table of Allotments,)
FM Broadcast Stations.)
)
(Snowflake, Arizona)) MM Docket 00-190
) RM-9985

COMMENTS BY PETITIONER

Proposed Rule Making adopted: September 27, 2000

Comment Date: December 1, 2000

1. The Petitioner incorporates by reference its previous pleadings in its Petition of Amend dated September 8, 2000.

2. The Petitioner hereby restates its intention to be an auction participant and apply for the channel if allotted, and if authorized, to build the station promptly.

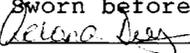
3. Petitioner has been requested to submit additional information to establish that Snowflake, Arizona is a community for allotment purposes. Petitioner submits the following information based upon data provided by the Arizona Department of Commerce and the local Chamber of Commerce.

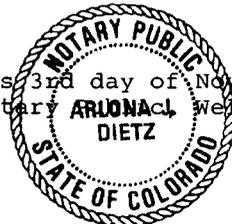
Snowflake, Arizona is an incorporated town in Navajo County, Arizona and is governed by a mayor and six additional council members elected by the town residents. Snowflake was founded in 1878. 85937 is the zip code for Snowflake post office. Snowflake has all the usual service providers found in a town of approximately 4,000 population, along with numerous banks, retail stores, police and fire protection as well as a complete school system. Snowflake has a 400 acre industrial park.

I, Robert D. Zellmer, hereby state that the information in this Comment is true and correct, and was obtained by me or under my direction:

Dated November 3, 2000


Robert D. Zellmer, Pres.
New Directions Media, Inc.

Sworn before me this 3rd day of November, 2000.
 Notary **ARIZONA** Weld County, Colorado.



COMMISSION EXPIRES
JUNE 16, 2004

Heber and Overgaard, in northeastern Arizona in Navajo County. Situated in the Sitgreaves National Forest north of the Mogollon Rim, their elevations range from 6,435 feet in Heber to 6,620 feet in Overgaard. Both are unincorporated. The communities are reached by taking state Highway 87 to Payson (north from Phoenix or south from Interstate 40), and continuing east via state Highway 260.

During the Mormon migration in 1876 and 1877, the Little Colorado River settlements were established. James E. Shelley and Sanford Porter, Jr. founded Heber in 1883. Heber was named after Heber J. Grant, a prominent member of the Mormon Church. The post office in Heber was established in 1890 by James E. Shelley.

Overgaard, adjoining Heber, was originally called Oklahoma Flat and was later named after the first sawmill owner. The post office in Overgaard was established in 1938.

PRINCIPAL ECONOMIC ACTIVITIES

Economic activities are varied; retirement and tourism are an important part of the economy. Proximity to the Sitgreaves National Forest provides recreation opportunities, and timber is harvested for Precision Pine Sawmill and Stone Container Paper Mill. A mulch plant processes forest by-products. Service businesses provide employment and services for the retirement community. Government and schools also contribute to the local economy. Retail trade is increasing. Construction is also a major factor in the economy.

SCENIC ATTRACTIONS

The Heber/Overgaard area is surrounded by many year-round recreational opportunities and points of scenic interest. Immediately south of Heber and Overgaard is the Mogollon Rim, a steep escarpment



ranging from 1,000 to 2,000 feet from the base to the highest plateau. The Rim divides the northern plateau region from the lower central and southern areas. The Rim offers many exceptional views and numerous man-made lakes ideal for boating and other water sports.

Hunting for elk, deer, turkey, antelope and bear is permitted. Fishing, in nearby trout streams, is popular. There are also extensive picnic and camping facilities available within the area. Other scenic attractions in the area include Chevelon Canyon Dam, the Canyon Creek Fish Hatchery, Chevelon Butte, and the Fort Apache Indian Reservation. The 200-acre Mogollon Lake three miles east of Overgaard is in the planning stages.

	POPULATION		
	1980	1990	1998
Heber/Overgaard	2,000	3,500	3,732*
Navajo County	67,629	77,658	92,500
Arizona	2,716,546	3,665,228	4,764,025

Sources: Arizona Department of Economic Security and U.S. Census Bureau.
 * 1998 estimate projected from county population growth rates. Local sources estimate area population to be 8,900 with summer population rising to 9,600.

	HEBER/OVERGAARD LABOR FORCE DATA		
	1994	1995	1998
Civilian Labor Force	616	646	628
Employed	556	587	567
Unemployed	60	59	61
Unemployment Rate	9.7%	9.1%	9.7%

Source: Arizona Department of Economic Security, U.S. Bureau of the Census.

	GROWTH INDICATORS		
	1990	1997	1998
Postal Receipts (\$)*	134,693	238,165	249,552
School Enrollment**	330	604	589
Net Assessed Valuation (\$)***	19,924,988	26,513,107	30,595,791

* Postal receipts are for fiscal year.
 ** Heber/Overgaard Unified District No. 6.
 *** Fire District.