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

November 3, 2000

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

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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.)
)
(Overgaard, Arizona)) MM Docket 00-191
) RM-9986

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 to Amend dated September 8, 2000.

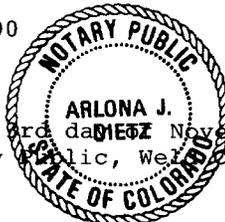
2. The Petitioner hereby restates its intention to be an auction participant and apply for the channel if allotted, and if authorized, to build the station promptly.

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

Overgaard is an unincorporated community in Navajo County, Arizona. The Overgaard post office was established in 1938. The community is governed by the Navajo County Board of Supervisors. Protection for the community and the many adjacent sub-divisions is provided by county deputies and highway patrolmen assigned to the area. There are many types of service providers in the community as well as medical services, volunteer fire department, banks, retail stores, chamber of commerce and an elementary, junior and senior high school system. Local sources estimate the area population to be 8,900 increasing to 9,600 during the summer. A copy of the Community Profile is included herewith.

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

Sworn before me this 3rd day of November, 2000.
Arlona J. Metz Notary Public, West County, Colorado
MY 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.