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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))	MM Docket No. 01-115
Table of Allotments)	RM-10129
FM Broadcast Stations)	
(Au Gres, Michigan))	

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COUNTERPROPOSAL

Crystal Clear Communications, Inc. ("Crystal Clear"), licensee of Station WBNZ(FM), Frankfort, Michigan, along with Fort Bend Broadcasting Company ("Fort Bend"), proposed transferee¹ of WBNZ (together, the "Proponents"), hereby submit this counterproposal to the *Notice of Proposed Rule Making*, DA 01-1303 (rel. May 25, 2001) in the above-captioned proceeding. The Proponents propose to upgrade WBNZ from Channel 257C2 to 257C1. In order to accomplish this Class C1 upgrade, the following changes to the FM Table of Allotments are requested (listed alphabetically):

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¹ The application for assignment of license was filed on April 25, 2001 (File No. BALH-20010425AAH) and is currently pending.

<u>Community</u>	<u>Channel</u>	
	<u>Existing</u>	<u>Proposed</u>
Alpena, MI	257C2	249C2
Beaverton, MI	249A	246A
Frankfort, MI	257C2	257C1
Cheboygan, MI (proposed)	249C3	271C3
Standish, MI	245A	295A

This proposal will require only three existing stations (WATZ, Alpena, WMRX, Beaverton, and WWCM, Standish) to change channel and only one of them (WWCM, Standish) to change its transmitter site reference point. As will be discussed further herein, the Proponents have entered into an agreement with the Standish station for reimbursement of the costs of its change, and the licensee has provided a consent statement for the change. In support hereof, the Proponents state as follows:

I. PRELIMINARY MATTERS

1. Crystal Clear and Fort Bend each hereby state that, as the licensee, it will reimburse all other licensees for their reasonable expenses in changing channel and/or transmitter site in accordance with *Circleville, Ohio*, 8 FCC 2d 159 (1967).² Crystal Clear and Fort Bend each also state that, as the licensee, it will apply for Channel 257C1 at Frankfort and construct the facility if the Commission grants this proposal.

2. Although two stations have not provided consent statements for their respective changes in facilities, this proposal complies with the Commission's policy in *Columbus, Nebraska*, 59 RR 2d 1185 (1986). The Proponents note that they are currently engaged in discussions with the licensee of WMRX, Beaverton, regarding reimbursement for its change, but,

² The Proponents anticipate that during the pendency of this proceeding, they will consummate the sale of Station WBNZ to Fort Bend, and Fort Bend will ultimately be responsible for the reimbursement of the affected licensees. Fort Bend hereby states that should it become the licensee of WBNZ, it will reimburse all other licensees for their reasonable expenses in changing channel and/or transmitter site.

at the filing deadline, had not yet finalized their agreement. The Proponents anticipate entering into an agreement with the WMRX licensee in the near future.

3. As a final preliminary matter, the Proponents hereby state that pursuant to Section 1.420(j), they have not paid or promised to pay any licensee, permittee or applicant for withdrawing an expression of interest, dismissing an application or forbearing to file an expression of interest or application.

II. CONFLICT WITH THE NPRM

4. As indicated in the attached Engineering Statement, this proposal conflicts with the *NPRM* proposal to allot Channel 295A to Au Gres, Michigan as its first local service. The Proponents offer an alternate channel (267A) to avoid the conflict, so that Au Gres can receive a new allotment and Frankfort can receive upgraded service. *See* Figure 9 and discussion below.

III. COMPLIANCE WITH THE COMMISSION'S TECHNICAL RULES

A. STATION WBNZ, FRANKFORT, MICHIGAN

5. As indicated in the attached channel study, Figure 1, Channel 257C1 can be allotted to Frankfort at coordinates 44-42-05 North Latitude, 85-39-24 West Longitude in compliance with the Commission's spacing rules and provide a 70 dBu signal to Frankfort (*See* Figure 2) provided a channel change is made at Alpena, Michigan.

6. The upgrade at Frankfort will result in a gain in service to 128,119 persons in an area of 7,682 sq. km., with a small loss in service to 8,121 persons in an area of 57 sq. km. *See* Figure 3.

7. Crystal Clear and Fort Bend reiterate that whichever is the licensee of WBNZ will apply for Channel 257C1 to serve Frankfort and construct the facility if the application is granted.

B. STATION WATZ, ALPENA, MICHIGAN

8. In order to allot Channel 257C1 to Frankfort, Channel 249C2 must be substituted for Channel 257C2 for Station WATZ, Alpena, Michigan at the station's current reference coordinates. Channel 249C2 can be allotted to Alpena provided channel substitutions are made at Beaverton and Cheboygan. *See* Figure 4. Each of these channel changes will be discussed below. The Proponents have not entered into a reimbursement agreement and did not obtain the consent of the Alpena licensee. Thus, the Proponents request that the Commission immediately issue an Order to Show Cause to WATZ Radio, Inc., the licensee of WATZ, in order to change its channel. The Proponents hereby state that they will reimburse the licensee in accordance with *Circleville, Ohio, supra*.

C. STATION WMRX, BEAVERTON, MICHIGAN

9. In order to substitute Channel 249C2 at Alpena, Channel 246A must be substituted for Channel 249A at Beaverton, Michigan for Station WMRX. Channel 246A can be substituted at the WMRX licensed site if an additional channel change is made at Standish, Michigan. *See* Figure 5. As discussed above, the Proponents are in negotiations with the licensee of Station WMRX to secure the licensee's consent to the channel change in exchange for reimbursement. Although no agreement has been reached as of the filing date, the Proponents reiterate that should the Commission adopt this proposal and substitute Channel 246A for Channel 249A at Beaverton, the Proponents will reimburse the licensee for its reasonable expenses in changing channels. In the interim, it will be necessary to issue an Order to Show Cause to Steel Broadcasting, Inc., the licensee of WMRX, in order to change its channel.

D. STATION WWCM, STANDISH, MICHIGAN

10. In order to substitute Channel 246A at Beaverton, Channel 295A must be substituted for Channel 245A at Standish, Michigan for Station WWCM. Channel 295A can be allotted at Standish at new reference coordinates. *See* Figure 6.

11. At the new site, Channel 245A will provide a 70 dBu contour to Standish. *See* Figure 7. The Channel 245A allotment will allow the Standish licensee to increase power. The channel and site change at Standish will result in a gain in service to 7,526 persons and in area of 413 sq. km., with no loss area. *See* Figure 8. Central Michigan University, the licensee of Station WWCM, has furnished a statement consenting to the change in channel and site. *See* Exhibit A. The Proponents have entered into an agreement with the licensee, and hereby state that they will reimburse the licensee for its expenses in changing channel and transmitter site.

12. The use of Channel 245A at Standish is mutually exclusive with its use at Au Gres, Michigan as proposed by Au Gres Broadcasting Company, the petitioner in this proceeding. As a result, this Counterproposal is appropriately considered in this proceeding. However, the grant of this Counterproposal need not preclude the initiation of a new first local service at Au Gres. Channel 267A can be allotted to Au Gres at new reference coordinates in place of Channel 245A. *See* Figure 9. At the proposed reference coordinates, the facility will deliver a 70 dBu signal to the community of Au Gres. *See* Figure 10. The proposed allotment of Channel 267A provides a signal to a population and area comparable to the petitioner's proposed Channel 245A allotment. *See* Figure 11.

E. CHANNEL 249C3/271C3, CHEBOYGAN, MICHIGAN

13. In order to allot Channel 249C2 to Alpena, Channel 271C3 must be substituted for Channel 249C3 at Cheboygan, Michigan, which was proposed in MM Docket No. 00-69. Channel 271C3 can be allotted at the proposed reference site for Channel 249C3 at Cheboygan, should Channel 249C3 be allotted there. *See* Figure 12.³ The Proponents are also filing comments in MM Docket No. 00-69 offering Channel 271C3 as an alternate channel at Cheboygan. The Proponents hereby state that should Channel 249C3 be allotted to Cheboygan

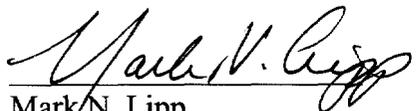
³ Figure 12 shows a short spacing to an application in Sault Ste. Marie, Michigan, File No. BPED-19981230MD. The applicant has requested dismissal of its application as part of a settlement agreement. Accordingly, the Proponents expect the application to be dismissed shortly.

in MM Docket No. 00-69, and the permittee construct its facility prior to the conclusion of this proceeding, the Proponents will reimburse the permittee for its costs in changing channels in accordance with *Circleville, Ohio, supra*.

IV. CONCLUSION

14. This counterproposal will provide upgraded service at Frankfort, Michigan. The proposal will provide overall net gains in area of 7,969 sq. km. and population of 127,439 persons. See Figure 13. The Proponents have provided an alternate channel for the Au Gres allotment requested by the petitioner, which will allow both the petition and this Counterproposal to be granted. The Proponents are confident that this Counterproposal can be implemented smoothly and rapidly. Therefore, the Proponents respectfully request that the Commission grant the Counterproposal to allot Channel 257C1 to Frankfort, Michigan.

CRYSTAL CLEAR COMMUNICATIONS, INC.
FORT BEND BROADCASTING
COMPANY

By: 
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Its Counsel

July 16, 2001

**Station WWCM
Standish, Michigan**

Central Michigan University, licensee of Station WWCM, Standish, Michigan, hereby agrees to have WWCM's channel changed from Channel 245A to Channel 295A and its allocation reference coordinates modified. Central Michigan University will file an application to implement the changes consistent with the FCC's spacing rules should the Commission take such action. Central Michigan University understands that this statement may be used in a filing with the Commission and hereby authorizes its use for that purpose.

I verify that this statement is true, complete and correct to the best of my knowledge and belief and is made in good faith.

CENTRAL MICHIGAN UNIVERSITY

By: 
Edward B. Grant,
Director of Public Broadcasting



ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM DOCKET 01-115, RM-10129

**Fort Bend Broadcasting Company
Crystal Clear Communications, Inc.**

Prepared by:

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July, 2001

**Engineering Statement
In Support of a
Counterproposal
MM Docket 01-104, RM-10129
The Joint Petitioners**

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Engineering Statement
In Support of a
Counterproposal
MM Docket 01-115
Fort Bend Broadcasting Company
Crystal Clear Communications, Inc.

General

The instant counterproposal was prepared for Fort Bend Broadcasting Company and Crystal Clear Communications, Inc. (herein referred to as "The Joint Petitioners"). Currently Crystal Clear is the licensee of WBNZ, channel 257C2, Frankfort, Michigan. A FCC Form 314 has been filed to transfer ownership of WBNZ from Crystal Clear to Fort Bend. This counterproposal is prepared and submitted in response to an NPRM for MM Docket 01-115. The Joint Petitioners propose to delete channel 257C2 at Frankfort and subsequently allocate channel 257C1 at Frankfort.

The instant counterproposal occurs due to The Petitioners' effort to upgrade WBNZ at Frankfort, Michigan from a class C2 to a class C1. A sub-move (additional spectrum modifications) required for this allotment create a mutually exclusive (MX) with the NPRM in its proposed use of channel 295A at Au Gres, Michigan. Because of this, The Joint Petitioners propose the use of channel 267A at Au Gres in lieu of channel 295A. Therefore, if the Commission adopts The Petitioners' counterproposal as submitted, the proposed allotment of channel 295A at Au Gres must be denied.

Methods

The Petitioners' counterproposal is presented in sections, with each channel or licensed facility where a change is proposed is discussed individually. All sections begin with an allocation or channel spacing study. Additional exhibits then support the proposed modification's technical compliance.

All searches were performed on a V-Soft SearchFM program and verified with the EDX FMSR search program. The FCC F(50,50) contours were calculated using SoftWright's Terrain Analysis Package (TAP) Version 4.00.571. The studies were based on the latest technical data from the Commission's databases. Mapping, population counts, and a professional mapping program from MapInfo Corporation, Version 5.5, conducted gain/loss area studies. The program contains the exact community boundaries of the relevant cities. In pertinent cases where community boundaries were critical, the boundaries were cross-checked with the U.S. Census Bureau's TIGER maps.

Nature of The Petitioners Counterproposal

A summary of all communities and their related channels (present and proposed) is included in Table 1 for reference. The Petitioners proposes to delete channel 257C2 at Frankfort and substitute channel 257C1 at Frankfort, Michigan for use by WBNZ. In order to accomplish this, various channels and licensed facilities are required to be modified in order to create compliance with §73.207. It produces a large increase in square kilometers covered. This is demonstrated by the large increase in the number of persons served by the new 60-dBu contours.

The allotment of channel 257C1 at Frankfort requires the following modifications:

- I). WATZ - channel 257C2, Alpena, Michigan. Presently WATZ, Alpena, Michigan, operates on channel 257C2. If WBNZ operates on channel 257C1 at its proposed reference coordinates, it creates a short spacing to WATZ of 55.79 kilometers. The instant counterproposal requires the substitution of channel 249C2 for channel 257C2 (WATZ) at the licensed site.

A). WMRX - channel 249A, Beaverton, Michigan. In order to allocate channel 249C2 at Alpena, the current WMRX channel of 249 must be substituted with channel 246 at its present site. (This is a MX channel change with no site modification..). If channel 249C2 is allocated to Alpena, it creates a prohibited short space to WMRX on channel 249A of 32.66 kilometers. The clearance for channel 249C2 at Alpena and the proposed third-adjacent channel of WMRX (channel 246A) has such an enormous separation clearance that it does not appear in the allocation studies.

1.) WWCM – channel 245A, Standish, Michigan. Presently WWCM operates as a sub-standard class A on channel 245A licensed to Standish, Michigan. In order to facilitate the substitution of channel 246A at Beaverton, channel 245A at Standish must be deleted and substituted for channel 295A at Standish for use by WWCM. A slight site modification is needed for this allotment. ***This is the point where the instant counterproposal is MX with the allocation of channel 295A at Au Gres, Michigan.***

a). AD295A – channel 295A, Au Gres, Michigan. In MM Docket 01-115 Au Gres Broadcasting Company requested the allocation of channel 295A at Au Gres, Michigan. However, this allocation is MX with the proposed use of channel 295A at Standish, Michigan. The Joint Petitioners propose the use of channel 267A in lieu of channel 4 295A at Au Gres. No other spectrum changes are necessary to allocate channel 267A at Au Gres.

b). AD249C3 - channel 249C3, Cheboygan, Michigan. Currently in MM Docket No. 00-69, a proposal for channel 249C3 at Cheboygan exists. If channel 249C3 is allocated to Cheboygan in MM Docket No. 00-69, it creates a short space to WATZ on channel 249C2 of 79.90 kilometers. The Joint Petitioners propose to eliminate this short space by deleting channel 249C3 at Cheboygan and substituting channel 271C3 with no reference site modification.

Even though channel 271C3 at Cheboygan is short spaced to an application for channel 272C3 at Sault Ste. Marie, Michigan, this application is of no concern, since the application to which channel 271C3 at Cheboygan is short spaced was the losing applicant at Sault Ste. Marie, Michigan. Therefore, it is of no concern. No other spectrum changes are necessary to effectuate this change.

This concludes all spectrum changes required to delete channel 257C2 at Frankfort and allot channel 257C1 at Frankfort.

EXHIBITS EXPLAINED

WBNZ

Exhibit E, Figure 1 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 257C1 at Frankfort. The study depicts all of the major on-channel and adjacent channel modifications required, but not the subchanges. Exhibit E, Figure 2 is a map generated using the programs and techniques in the Methods section of the instant counterproposal. This study depicts the WBNZ channel 257C1 allotment coordinates, a maximum class C1 70 dBu contour, and the community boundaries

of Frankfort. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 3 is a map demonstrating the gain and loss area of the respective 60 dBu contours for WBNZ.

WATZ

Exhibit E, Figure 4 is an allocation study depicting the spacing to all known FM facilities that are affected by the substitution of channel 249C2 for channel 257C2 at the licensed site of WATZ, Alpena, Michigan.

WMRX

Exhibit E, Figure 5 is an allocation study showing that channel 246A can be allocated to Beaverton once channel 249A at Beaverton is deleted. This allocation study shows that the substitution of channel 246A at Beaverton is dependent upon the deletion of channel 245A at Standish.

WWCM

Exhibit E, Figure 6 is an allocation study depicting spacing to all known FM facilities for the allocation of channel 295A in lieu of channel 245A at Standish, Michigan. Exhibit E, Figure 7 is a class A hypothetical 70 dBu contour showing 100% coverage of channel 295A over Standish. Exhibit E, Figure 8 is a gain/loss study map that provides the area and population gained and lost as a result of the change in WWCM's operation.

Vacant Allotment, channel 295A, Au Gres, MI

Exhibit E, Figure 9 is an allocation study showing the proposed substitution of channel 267A for channel 295A at Au Gres, Michigan. This substitution will allow Au Gres to maintain the proposed first local service. Exhibit E, Figure 10 is a hypothetical class A 70 dBu contour that shows the proposed 70 dBu contour covers 100% of the community of Au Gres. Exhibit E, Figure 11 is a gain/loss study showing the modified coordinates for the allotment at Au Gres versus the original allocation coordinates.

Vacant Allotment, Channel 249C3, Cheboygan, Michigan

Exhibit E, Figure 12 is an allocation study depicting the spacing to all known FM facilities that are affected by the substitution of channel 271C3 for channel 249C3 at Cheboygan, Michigan. The study shows short spacing to an application on channel 272C3 at Sault Ste. Marie, Michigan. However, that applicant (Broadcasting for the Challenged) was an unsuccessful applicant for that channel. Hence, no other spectrum changes are needed to substitute that channel with no site modification.

Cumulative Gain/Loss Study

Exhibit E, Figure 13 is a cumulative gain/loss study that includes two facilities (and one allocation) that have a deviation in their coverage area proposed by the instant counterproposal. Listed in the study is each station's loss and gain area in square kilometers and the population gains and losses in number of persons according to the U.S. Census Bureau's estimated 1999 population figures. It depicts a cumulative total loss area of 174 square kilometers and a gain area of 8,143 square kilometers. The Joint Petitioners' counterproposal has a net area gain of 7,969 square kilometers. The population loss has a cumulative loss of 10,820 persons, while the population gain is 138,259 persons. Therefore, the net population gain of The Petitioners' counterproposal is 127,439 persons.

Conclusion

The Petitioners' counterproposal has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The counterproposal produces an upgrade at Frankfort, Michigan (including significant population and area gains), and it also proposes an alternative channel for Au Gres, Michigan.

Statement of the Consultants

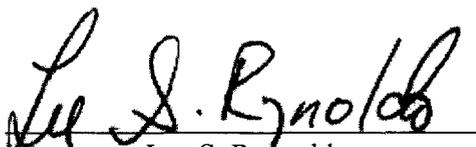
Lee S. Reynolds and Virgle Leon Strickland of Reynolds Technical Associates prepared this Counterproposal. The Joint Petitioners may not use it for purposes other than submission to the Commission.

It may not be reproduced in part, or in its entirety, by anyone (other than from the Commission) without the written consent of Reynolds and Strickland.

Reynolds and Strickland prepare it for the Petitioner under contractual agreement and their certification is used accordingly.

The information in this supplement is compiled from the most recent Commission and outside data. Reynolds and Strickland are not responsible for errors resulting from incorrect data, or unpublished procedures and rule changes.

For Reynolds and Strickland:


Lee S. Reynolds

July 13th, 2001

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ENGINEERING STATEMENT
 In Support of a
Counterproposal
 MM Docket 01-115, RM-10129
 The Joint Petitioners

Summary of Channel Assignments in Instant Counterproposal
 (Depicting all communities, channels, and modifications)

<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>	<u>COMMENTS (changes to NPRM shown as bold italic)</u>
Frankfort, MI	257C2	257C1	Delete Ch257C2 at Frankfort & add Ch257C1 as an upgrade.
Alpena, MI	257C2, 299C1	249C2, 299C1	Substitute Ch249C2 for Ch257C2 with no change in coordinates.
Beaverton, MI	249A	246A	Substitute Ch246A for Ch249A at Beaverton with no change in reference coordinates.
Standish, MI	245A	295A	Delete Ch245A and substitute Ch295A at WWCM licensed site. Ch295A at Standish is MX point with instant PRM (AD295A at Au Gres).
Au Gres, MI	295A	267A	Proposed substitution in instant counterproposal.
Cheboygan, MI	249C3, 260C2, 286C1	260C2, 271C3, 286C1	Substitute Ch271C3 for Ch249C3 at Cheboygan. Ch249C3 is a proposal allotment.

Table I

Engineering Statement

In Support of a Counterproposal

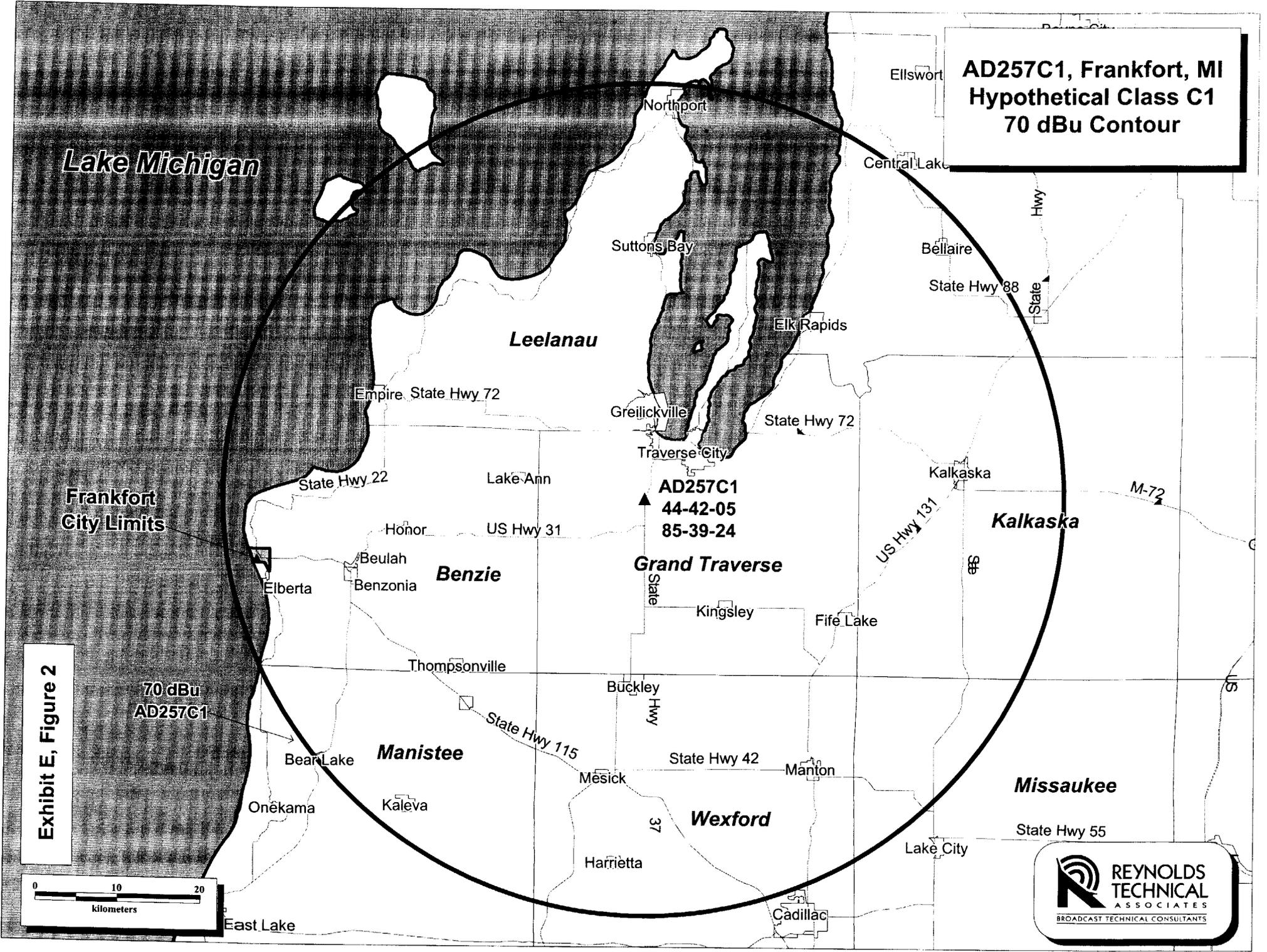
Channel 257C1 at Frankfort, MI (WBNZ) Allocation Study (Using Proposed Allocation Coordinates as Reference)

REFERENCE		DISPLAY DATES
44 42 05 N	CLASS = C1	DATA 07-07-01
85 39 24 W	Current Spacings	SEARCH 07-11-01
----- Channel 257 - 99.3 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin	

Community of	Frankfort	MI	46.42	260.4			
Reference Coordinates:							
North Latitude: 44-38-00							
West Longitude: 86-14-03							
WBNZ LIC 257C2	Frankfort	MI	41.22	256.0	224.0	-182.78	
Of no concern:							
Licensed facility for WBNZ							
Proposed deletion of channel 257C2 at Frankfort							
And the allotment of channel 257C1 at Frankfort							
WATZFM LIC 257C2	Alpena	MI	168.21	83.3	224.0	-55.79	
Of concern:							
Substitution of channel 249C2 for							
Channel 257C2 at Alpena proposed							
In instant counterproposal							
RADD	ADD 260C1	Bellaire	MI	82.88	29.8	82.0	0.88
WOWN	LIC 257C3	Shawano	WI	212.15	272.5	211.0	1.15
WIAA	LIC 204C	Interlochen	MI	47.50	185.5	41.0	6.50
WJQK	LIC 257A	Zeeland	MI	210.82	186.7	200.0	10.82
RADD	ADD 254A	Ludington	MI	93.71	220.4	75.0	18.71
RADD	ADD 254A	Ludington	MI	93.71	220.4	75.0	18.71
RADD	ADD 254A	Ludington	MI	93.71	220.4	75.0	18.71
WKLZFM	LIC 255C1	Petoskey	MI	102.62	32.4	82.0	20.62
ALLO	VAC 255A	St. Helen	MI	97.80	204.9	75.0	22.80
WFMK	LIC 256B	East Lansing	MI	243.61	157.2	195.0	48.61

**AD257C1, Frankfort, MI
Hypothetical Class C1
70 dBu Contour**



**AD257C1
44-42-05
85-39-24**

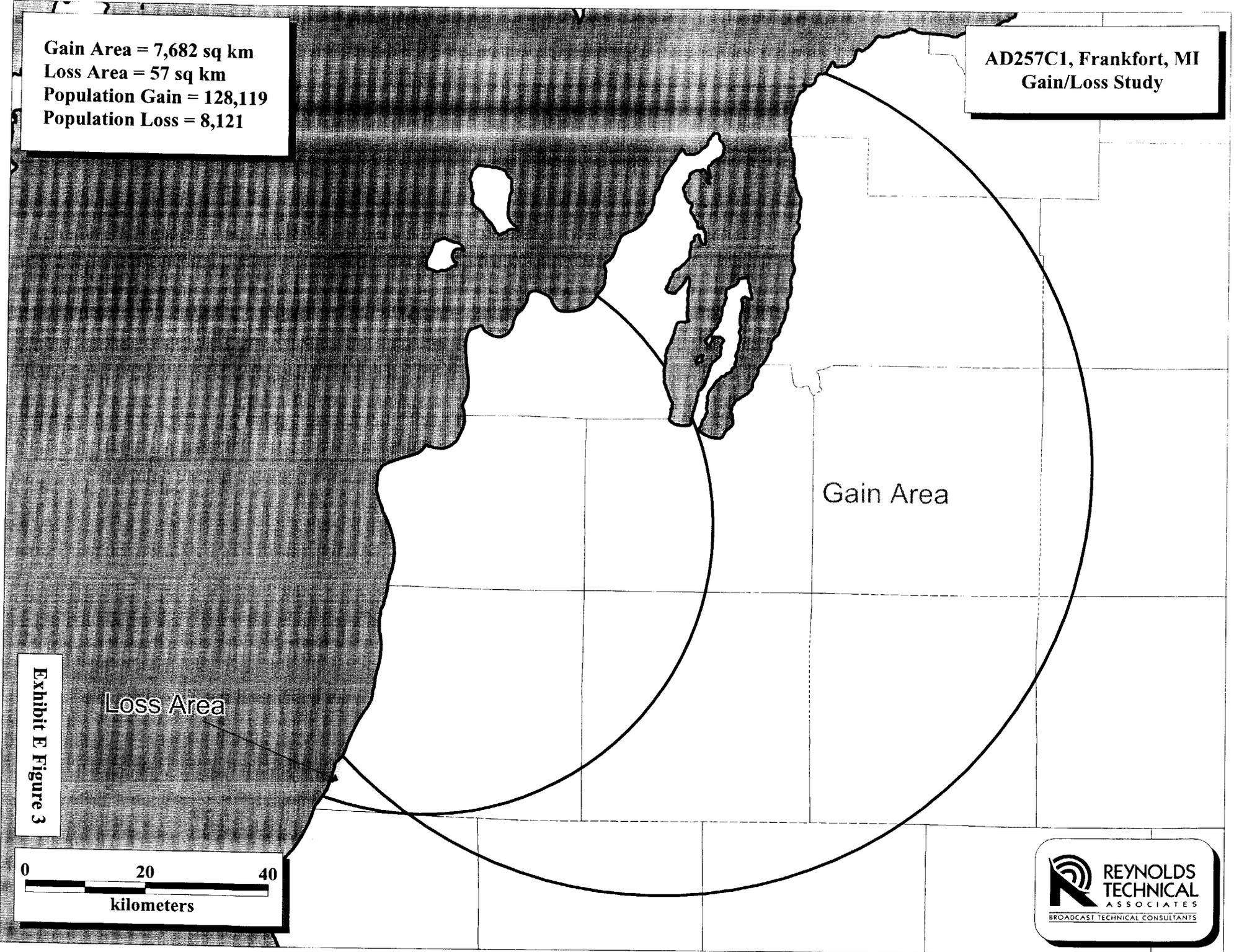
Exhibit E, Figure 2

**70 dBu
AD257C1**



Gain Area = 7,682 sq km
Loss Area = 57 sq km
Population Gain = 128,119
Population Loss = 8,121

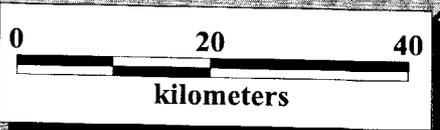
AD257C1, Frankfort, MI
Gain/Loss Study



Gain Area

Loss Area

Exhibit E Figure 3



Engineering Statement

In Support of a Counterproposal

Channel 249C2 at Alpena, MI (WATZ) Allocation Study (Using Current Licensed Site as Reference)

REFERENCE		DISPLAY DATES				
44 51 25 N	CLASS = C2	DATA 07-07-01				
83 32 34 W	Current Spacings	SEARCH 07-11-01				
----- Channel 249 - 97.7 MHz -----						
Call	Channel	Location	Dist	Azi	FCC	Margin

Community of	Alpena	MI	24.36	20.8		
Reference Coordinates:						
North Latitude: 45-03-42						
West Longitude: 83-25-57						
RADD	ADD 249C3	Cheboygan	MI	97.10	326.1	177.0 -79.90
Of concern:						
Substitution of channel 271C3						
At Cheboygan proposed in						
Instant counterproposal						
WMRXFM LIC 249A	Beaverton	MI	133.34	216.4	166.0	-32.66
WMRXFM LIC 249A	Beaverton	MI	133.34	216.4	166.0	-32.66
Of concern:						
Substitution of channel 246A						
At Beaverton proposed in						
Instant counterproposal						
WKLT	LIC 248C2	Kalkaska	MI	134.34	267.5	130.0 4.34
WTGVFM	LIC 249A	Sandusky	MI	172.27	160.6	166.0 6.27
CBCEFM	OPE 248B	Little Current	ON	170.42	44.8	164.0 6.42
ALLO	250	Port Elgin	ON	176.36	104.8	164.0 12.36
R---	ADD 249	Muskoka	ON	303.93	83.1	271.0 32.93
R---	ADD 249C1	Barrie	ON	319.44	94.8	271.0 48.44

Engineering Statement

In Support of a Counterproposal

Channel 246A at Beaverton, MI (WMRX) Allocation Study (Using Current Licensed Site as Reference)

REFERENCE					DISPLAY DATES		
43 53 16 N	CLASS = A				DATA 07-07-01		
84 31 45 W	Current Spacings				SEARCH 07-11-01		
----- Channel 246 - 97.1 MHz -----							
Call	Channel	Location	Dist	Azi	FCC	Margin	

Community of	Beaverton	MI	3.63	100.3			
Reference Coordinates:							
North Latitude: 43-52-55							
West Longitude: 84-29-05							
WMRXFM LIC 249A	Beaverton	MI	0.00	0.0	31.0	-31.00	
WMRXFM LIC 249A	Beaverton	MI	0.00	0.0	31.0	-31.00	
Of no concern:							
Current licensed facility of WMRX							
Proposed deletion of channel 249A							
At Beaverton and substitution of							
Channel 246A at Beaverton							
WWCM LIC 245A	Standish	MI	44.89	68.3	72.0	-27.11	
WWCM LIC 245A	Standish	MI	44.89	68.3	72.0	-27.11	
Of concern:							
Proposed deletion of channel 245A							
At Standish and substitution of channel							
295A at Standish in instant counterproposal							
WEEG LIC 247A	Essexville	MI	74.34	123.8	72.0	2.34	
WLAVFM LIC 245B	Grand Rapids	MI	124.29	220.5	113.0	11.29	
WKRKFM LIC 246B	Detroit	MI	189.60	145.1	178.0	11.60	
WDEEFM LIC 247A	Reed City	MI	88.22	262.6	72.0	16.22	

Engineering Statement

In Support of a Counterproposal

Channel 295A at Standish, MI (WWCM) Allocation Study (Using Proposed Allocation Site as Reference)

REFERENCE		DISPLAY DATES				
44 01 46 N	CLASS = A	DATA 07-07-01				
83 57 44 W	Current Spacings	SEARCH 07-11-01				
----- Channel 295 - 106.9 MHz -----						
Call	Channel	Location	Dist	Azi	FCC	Margin

Community of	Standish		MI	5.19	176.8	
Reference Coordinates:						
North Latitude: 43-58-58						
West Longitude: 83-57-31						
RADD	ADD 295A	Au Gres	MI	21.46	84.2	115.0 -93.54
Of concern:						
MX point with instant NPRM						
Channel 267A at Au Gres proposed						
As substitute to eliminate the MX						
WKPK	LIC 294C1	Gaylord	MI	132.91	328.5	133.0 -0.09
WTLZ	LIC 296A	Saginaw	MI	75.14	177.3	72.0 3.14
WMUSFM	CP 295B	Muskegon	MI	192.92	243.2	178.0 14.92
WMUSFM	LIC 295B	Muskegon	MI	192.92	243.2	178.0 14.92
WHNN	LIC 241C	Bay City	MI	57.31	157.5	29.0 28.31
WGER.C	CP 292A	Saginaw	MI	61.36	179.1	31.0 30.36
WGER	LIC 292A	Saginaw	MI	61.36	179.1	31.0 30.36
ALLO	295	Manitoulin Island	ON	248.86	31.1	210.0 38.86
WCKC	LIC 296A	Cadillac	MI	111.20	278.6	72.0 39.20

**AD295A, Standish, MI
Hypothetical Class A
70 dBu Contour**

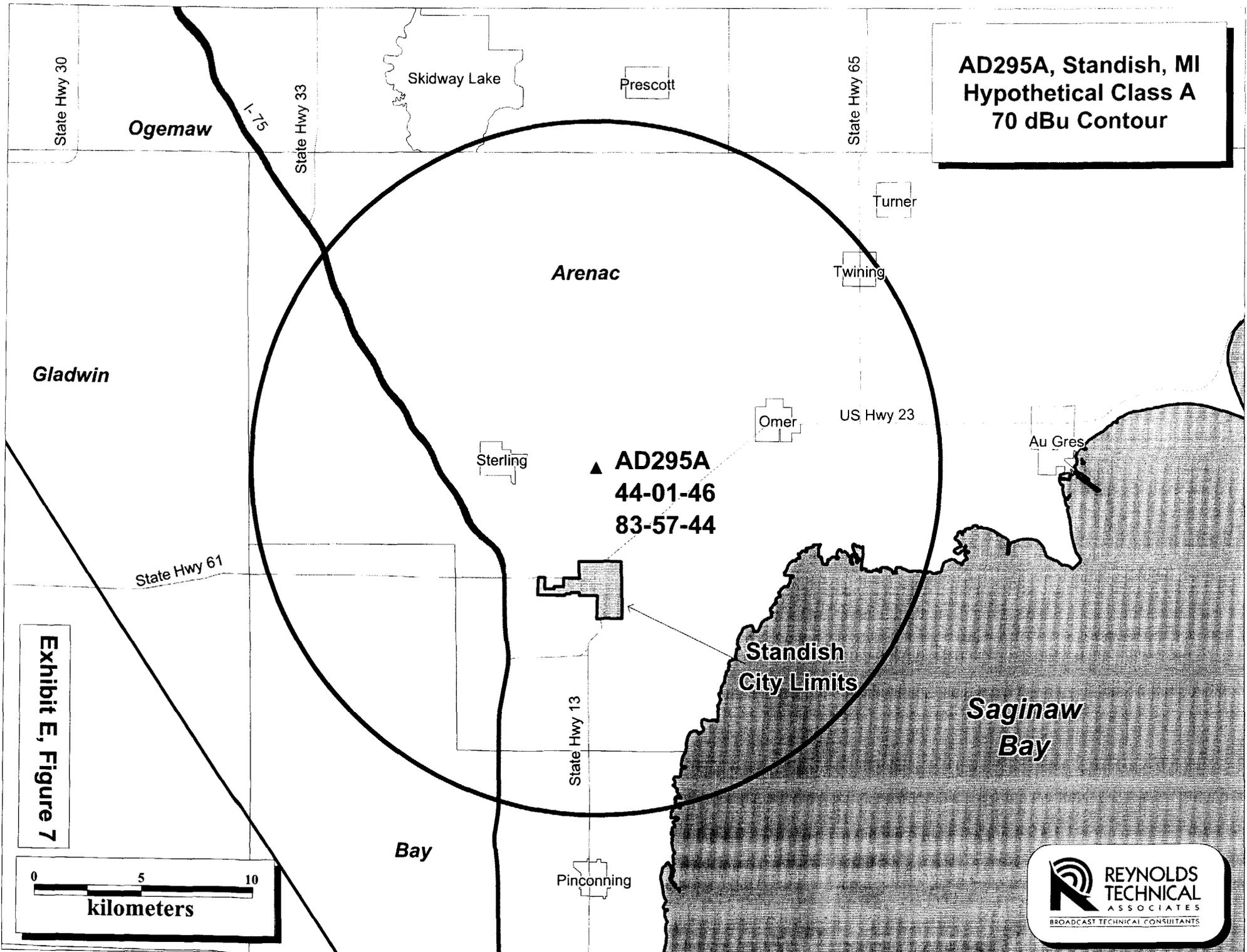
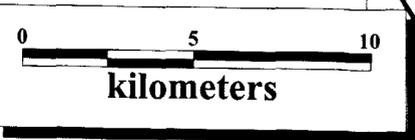


Exhibit E, Figure 7



Gain Area = 413.0 sq km
Loss Area = 0 sq km
Population Gain = 7,526
Population Loss = 0

AD295A, Standish, MI
Gain/Loss Study

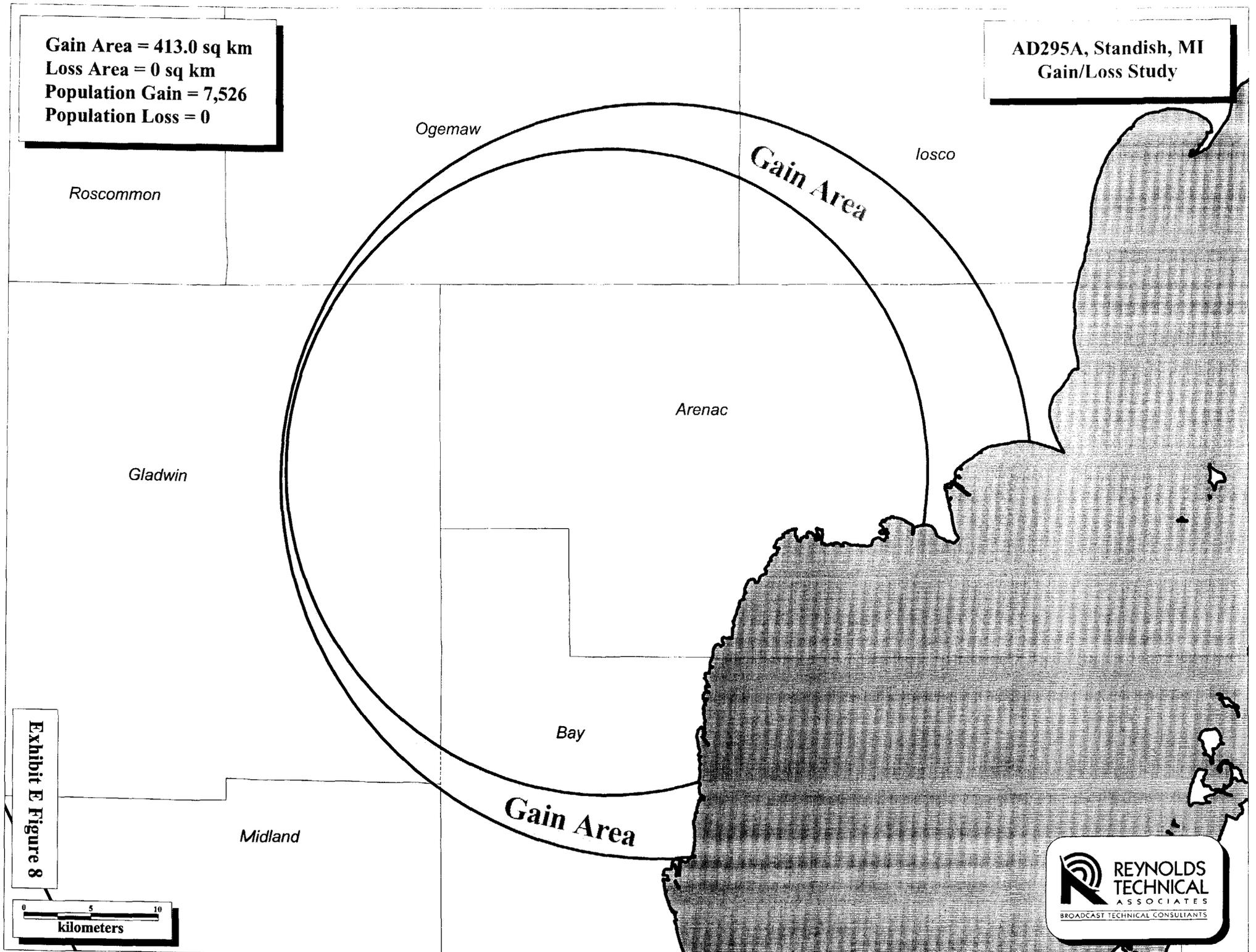


Exhibit E Figure 8

0 5 10
kilometers



Engineering Statement

In Support of a Counterproposal

Channel 267A at Au Gres, MI Allocation Study (Using Proposed Allocation Site as Reference)

REFERENCE		DISPLAY DATES				
44 03 47 N	CLASS = A	DATA 07-07-01				
83 39 40 W	Current Spacings	SEARCH 07-11-01				
----- Channel 267 - 101.3 MHz -----						
Call	Channel	Location	Dist	Azi	FCC	Margin

Community of	Au Gres	MI	3.21	239.3		
Reference Coordinates:						
North Latitude: 44-02-54						
West Longitude: 83-41-44						

WBFX	LIC 267B	Grand Rapids	MI	178.02	230.9	178.0 0.02
WYLZ	LIC 265A	Pinconning	MI	42.17	235.2	31.0 11.17
ALLO	VAC 268C2	Gaylord	MI	121.72	331.2	106.0 15.72
WMJZFM	APP 268C2	Gaylord	MI	121.72	331.2	106.0 15.72
WWBN	LIC 268A	Tuscola	MI	89.18	171.9	72.0 17.18
RDEL	DEL 268A	Tuscola	MI	89.18	171.9	72.0 17.18
RADD	ADD 268A	Clio	MI	89.25	185.2	72.0 17.25
WCLS	LIC 264C3	Oscoda	MI	61.56	21.4	42.0 19.56
WWBN.A	APP 268A	Tuscola	MI	96.25	175.0	72.0 24.25
WQON	LIC 266A	Roscommon	MI	99.77	304.9	72.0 27.77
WPRJ	LIC 269A	Coleman	MI	70.41	246.8	31.0 39.41
CKOTFM	OPE 267B	Tillsonburg	ON	256.40	116.2	210.0 46.40

**AD267A, Au Gres, MI
Hypothetical Class A
70 dBu Contour**

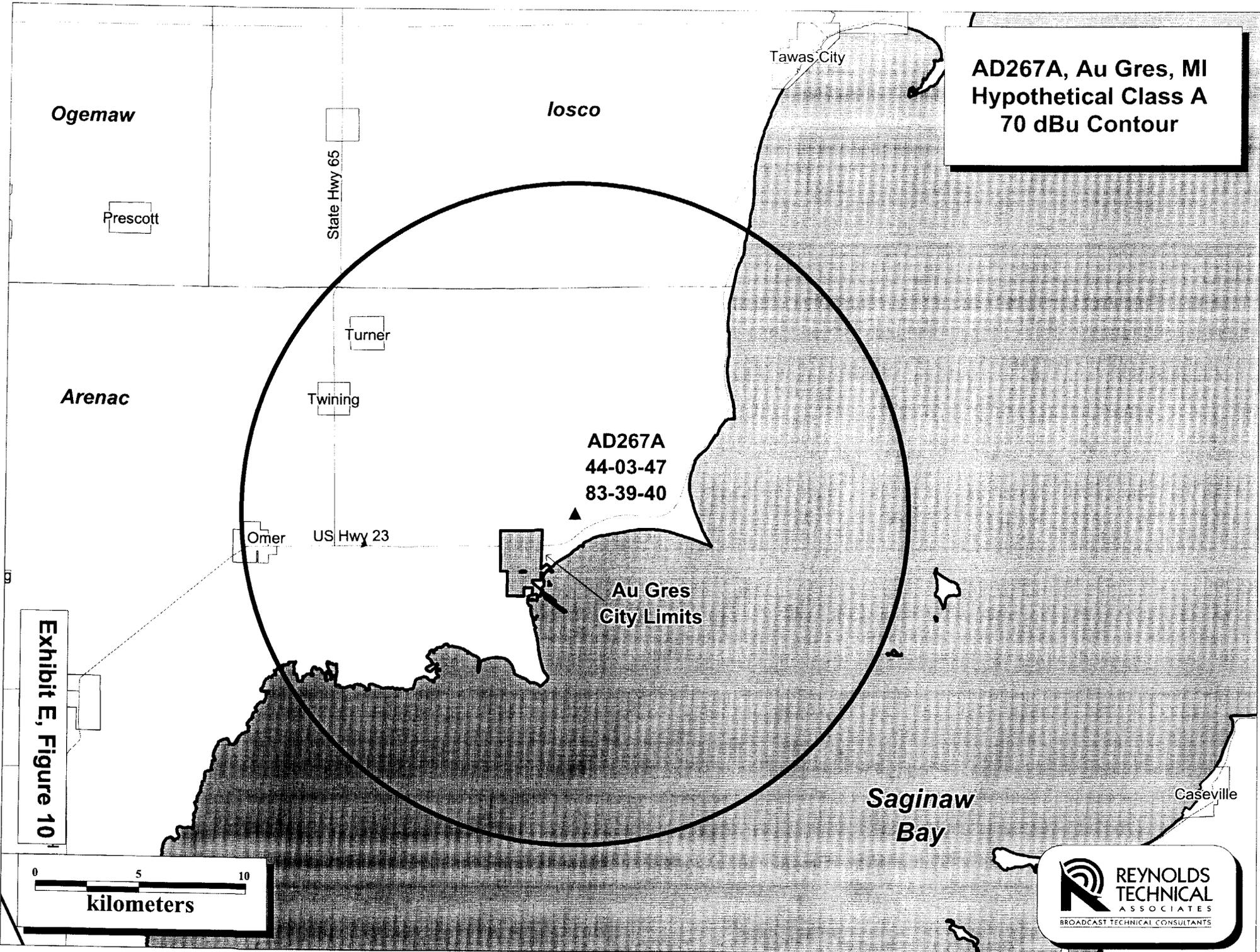
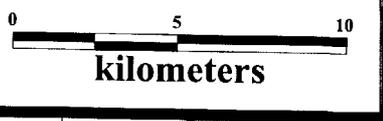


Exhibit E, Figure 10



Gain Area = 48 sq km
Loss Area = 117 sq km
Population Gain = 2,614
Population Loss = 2,699

AD295A/AD267A
Au Gres, MI
Gain/Loss Study

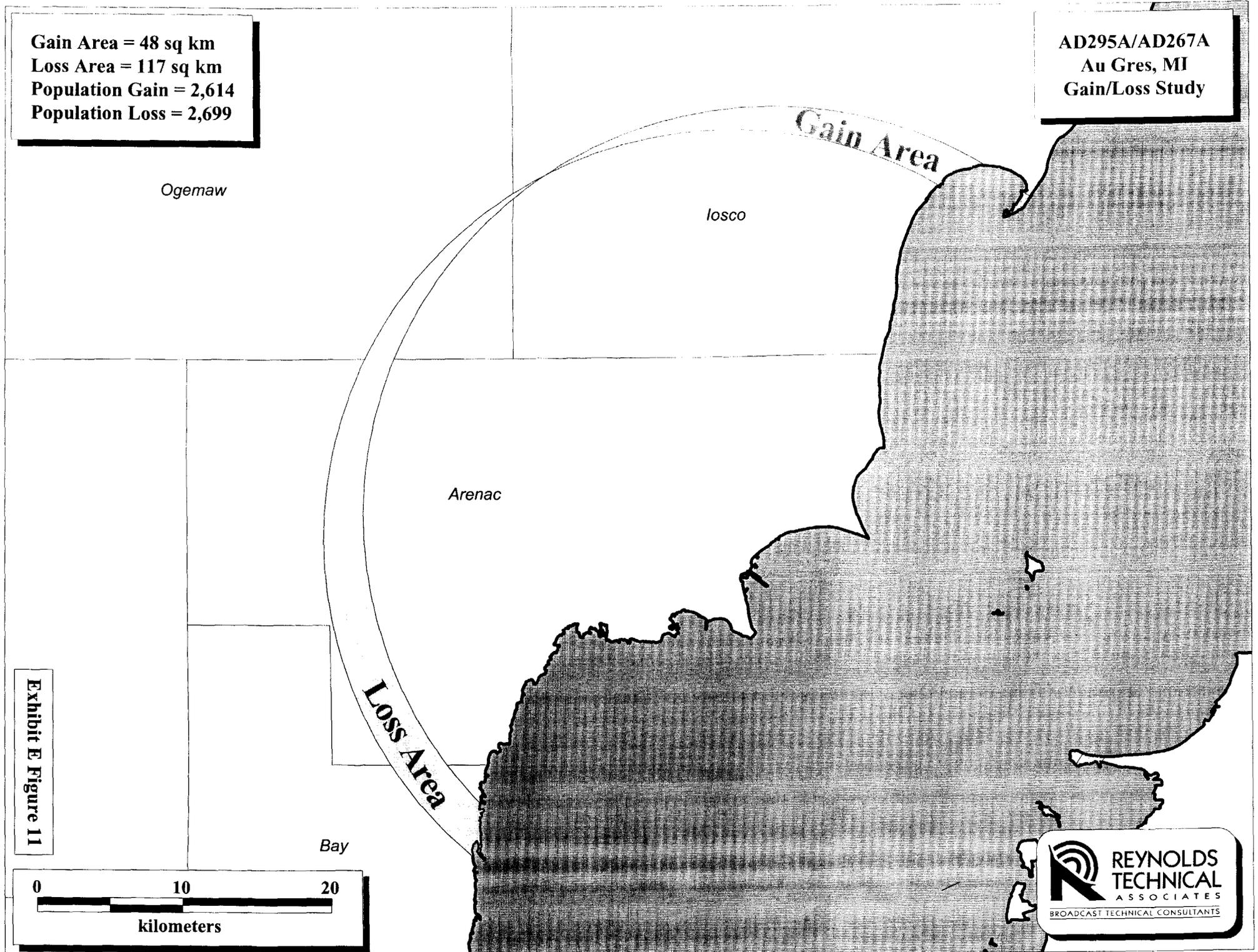


Exhibit E Figure 11



Engineering Statement

In Support of a Counterproposal

Channel 271C3 at Cheboygan, MI Allocation Study (Using Allocation Site of Channel 249C3 at Cheboygan as Reference)

Call	Channel	Location	Dist	Azi	FCC	Margin
----- Channel 271 - 102.1 MHz -----						
Community of	Cheboygan		MI	19.91	292.3	
Reference Coordinates:						
North Latitude: 45-38-49						
West Longitude: 84-28-27						
981230 APP 272C3	Sault Ste. Marie		MI	92.69	355.4	99.0 -6.31
Of note:						
Applicant (Broadcasting for the Challenged)						
Was the losing applicant for channel 272C3						
At Sault Ste. Marie. Hence, this facility						
Is of no concern.						
WLDR LIC 270C1	Traverse City		MI	145.65	232.3	144.0 1.65
980707 APP 272C3	Sault Ste. Marie		MI	100.78	0.3	99.0 1.78
ALLO VAC 272C3	Sault Ste. Marie		MI	101.96	355.1	99.0 2.96
WMJZFM APP 268C2	Gaylord		MI	63.65	192.1	56.0 7.65
ALLO VAC 268C2	Gaylord		MI	63.65	192.1	56.0 7.65
ALLO VAC 268A	Gaylord		MI	69.91	208.4	42.0 27.91
WMJZFM LIC 268A	Gaylord		MI	69.91	208.4	42.0 27.91
WLEWFM LIC 271C2	Bad Axe		MI	207.33	154.5	177.0 30.33

**Engineering Statement
In Support of a
Counterproposal
MM Docket 01-115, RM-10129
The Joint Petitioners**

Cumulative Gain/Loss Studies

<u>City</u>	<u>Loss Area (sq. km)</u>	<u>Gain Area (sq. km)</u>	<u>Pop. Loss (1999)</u>	<u>Pop. Gain (1999)</u>
Frankfort, Michigan	57	7,682	8,121	128,119
Standish, Michigan	0	413	0	7,526
Au Gres, Michigan	117	48	2,699	2,614
Totals	174	8,143	10,820	138,259

Net Area Gain: 7,969 sq. km
Net Population Gain: 127,439

CERTIFICATE OF SERVICE

I, Kay D. Dallosta, a secretary in the law firm of Shook, Hardy and Bacon, do hereby certify that I have on this 16th day of July, 2001, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Counterproposal" to the following:

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Mass Media Bureau
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Washington, D.C. 20554

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WATZ Radio, Inc.
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Traverse City, MI 49684

* HAND DELIVERED



Kay D. Dallosta