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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, DC

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations)
(Dos Palos and Chualar, California))
)
)
)
To: Chief, Allocations Branch)

MM Docket No. 01-148
RM-10241

ORIGINAL

CONSOLIDATED REPLY COMMENTS OF KNT0, INC.

KNT0, Inc., licensee of Station KNT0(FM), Livingston, California, by its attorney, hereby submits reply comments¹ in response to the "Comments and Counterproposal" filed by Coyote Communications, Inc. ("Counterproposal"), and the "Comments in Opposition" filed by J&M Broadcasting, Inc. ("J&M Comments") in this proceeding. With respect thereto, the following is stated:

Coyote's Counterproposal Must Be Dismissed

In this proceeding, KNT0 is seeking Commission consent to move to Channel 240A, Station KNT0(FM) from Livingston to Chualar. As a counterproposal to that proposal, Coyote Communications, Inc. ("Coyote") has proposed that the Commission allot Channel 240A to "Big Sur, California. Coyote asserts that:

Big Sur is a community of about 1,500 population located along the scenic California Highway One, 27 miles south of Carmel, between Santa Lucia Mountain and the Pacific Coast. It is a significant area for tourism and recreation, and is well-settled and established, with a variety of businesses, community outlets, services and events.

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List A B C D E

¹ The Comment date recited in the NPRM was erroneously stated to be November 12, 2001, which was a National Holiday. Therefore, the correct Comment date was November 13, 2001, and the correct Reply Comment date is November 28, 2001.

Counterproposal at 3. No documentation establishing any of these claims has been filed with the Counterproposal.

The Counterproposal therefore must be rejected. The Commission's long-standing policy is to require allotments be made to communities composed of "geographically identifiable population groupings." This requirement is generally satisfied if the proposed community is either incorporated or listed in the U.S. Census. *Moncks Corner, Kiawah Island and Sampit, SC*, 11 FCC Rcd 8630, ¶ 15 (MMB 1996). In this case, the "Big Sur" locale is neither incorporated nor listed in the U.S. Census. Consequently:

It is the Commission's policy that, if a community is not incorporated or listed in the census reports, the proponents of an allotment must show the place to be a "geographically identifiable population grouping." Although the proponents need not show that the borders of the locality are precisely ascertainable, what must be shown is that residents of the locality are commonly regarded as a distinct group. This can be proven by the "testimony of local residents or by objective indications of the existence of a common perception that a locality's populace constitutes a distinct 'geographical population grouping'." Examples of objective indications of community status may include photographs indicating the existence of political, commercial, social and religious organizations, and services in the community.

Benavides, Bruno and Rio Grande, TX, 13 FCC Rcd 2096, ¶ 8 Chief, Allocations Branch 1998) (footnotes omitted). In the past, the Commission has rejected claims of "community" status where a nexus has not been shown between the political, social, and commercial organizations and the community in question. See *Moncks Corner, et al.*, 11 FCC Rcd at ¶¶ 15-17; *Gretna, FL, et al.*, 6 FCC Rcd 633 (1991), and cases cited therein.

It also is Commission policy that counterproposals are required to be "technically correct and substantially complete" at the time they are filed. See, e.g., *Fort Bragg, CA*, 6 FCC Rcd 5817 (MMB 1991); *Provincetown, Dennis, Dennis Port, West Yarmouth and Harwich Port, MA*, 8 FCC Rcd 19 (MMB 1992); and *Sanford and Robbins, NC*, 12 FCC Rcd 1 (MMB 1997).

In this case, absolutely *no* testimonial or objective information has been submitted by Coyote to buttress its bald assertion that “Big Sur” is entitled to community status. Insofar as Coyote did not submit sufficient information at the time it filed its Counterproposal, its Counterproposal must be rejected. In this regard, Coyote’s situation is identical to that found in *Pike Road and Ramer, AL*, 10 FCC Rcd 10347 (MMB 1995). In that case, a Counterproposal was submitted for a nominal community that *also* was neither incorporated or listed in the U.S. Census. The Commission ultimately rejected the counterproposal, stating:

Next, we consider Miller's counterproposal to allot Channel 248A to Ramer, Alabama. In its proposal, Miller represented that Ramer is "a functioning, ... incorporated community... with municipal services." On the basis of those representations, as well as its acceptability from our preliminary engineering analysis, the proposal was accepted for consideration. In retrospect, we believe its proposal should not have been accorded such status. According to the 1990 U.S. Census, Ramer is not listed as an incorporated entity or a Census Designated Place.... Therefore, it was incumbent upon Miller to initially present the Commission with sufficient evidence to demonstrate that Ramer is a community for allotment purposes. See *Garden City, Indiana*, 6 FCC Rcd 3747 (1991). We conclude that Miller failed to provide substantially complete information with his counterproposal, in contravention of Commission policy, to demonstrate that Ramer has political, social, economic or cultural indicia, or to provide the testimony of local residents attesting to Ramer's community status. Therefore, we conclude that it is not a bona fide community for allotment purposes and must be denied.

Id. at ¶ 13. For the same reasons, Coyote’s Counterproposal must also be rejected and given no further consideration.

In any event, even *if* the Commission allows Coyote to overcome this Commission policy and even *if* at some point Coyote can develop information sufficient to establish that “Big Sur” is a licensable “community,” even in that event, the counterproposal must be denied. The local area residents refer to the Big Sur Area as an area extending approximately 25 miles of coast line, from Point Sur on the North, to the Area known as Lucia on the South. It is well-established that

at the allotment stage, the Commission assumes that city-grade coverage can be provided by Class A stations where the transmitter is located no more than 16.2 kilometers (10.1 miles) from the center of the community. *Fair Bluff, NC*, 11 FCC Rcd 12662, ¶ 3 (MMB 1996). Therefore, even *if* the allotment reference points were situated in the “center” of “Big Sur,” the allotment would be incapable of providing a City-Grade contour over the entirety of “Big Sur” in compliance with 47 C.F.R. § 73.315(a) of the Commission’s Rules.

Third, even if acceptable, the “Big Sur” proposal should be denied as an inefficient use of the spectrum. As noted previously, allotting Channel 240A to Chualar would allow 60 dBu service to **56,316 persons** over the present KNTD licensed facilities in Livingston, as well as improved 60 dBu service to **164,648 more persons** than would have been provided by the continued allotment and construction of Channel 240A at Dos Palos, California, for a total anticipated service of 204,817 persons. In contrast, the *total* service that can be provided by the “Big Sur” allotment is “6,550” persons. Attachment 1. This is in keeping with the fact that area is largely sparsely inhabited or uninhabited. Thus, there is little public interest benefit that would be furthered by approving the “Big Sur” allotment.

Finally, in any event, even *if* all of these infirmities were overcome, an alternative channel exists for “Big Sur,” namely Channel 236A, that can be allotted in place of Channel 240A. Attachment 1. Channel 236A can utilize the same designated reference coordinates as those proposed by Coyote, and therefore qualifies as an equivalent channel. Therefore, if necessary and appropriate, the Commission can grant *both* the Chualar and “Big Sur” proposals.

For all of these reasons, the proposal to allot Channel 240A to “Big Sur” in lieu of Chualar must be denied.

Chualar is a Community for Section 307(b) Purposes

The Commission's long-standing policy is to require allotments be made to communities composed of "geographically identifiable population groupings." This requirement is generally satisfied if the proposed community is either incorporated or listed in the U.S. Census. *Grant and Peralta, NM*, 14 FCC Rcd 21446, ¶ 8 (MMB 1999).

In this case, Chualar is a Census Designated Place (Attachment 2), and the Commission already has afforded Chualar "community status," insofar as Station KHAD(FM) already is licensed to the community. Moreover, nothing submitted by Coyote establishes a basis for removing that status. As even Coyote's declarations establish that although "modest" and "rural" in nature, the town consists of "dozen city blocks" (Counterproposal at 4), and has churches, stores, a small post office, and a public elementary school. *Id.* Nothing filed establishes that the area no longer is regarded by its residents as a separate and distinct community.

No Tuck Showing is Required in this Case

Coyote also claims that a *Tuck*² showing is required, stating that the KNTO proposal for Chualar would result in 70 dBu service to "57%" of the Salinas, California Urbanized Area. This determination evidently is based upon use of actual terrain characteristics from the proposed allotment point. That methodology is inaccurate. As Commission policy clearly states: "Normally, the Commission does not evaluate specific terrain data in allotment proceedings." *Woodstock and Broadway, VA*, 3 FCC Rcd 6398, ¶ 9 (1988). Use of specific terrain at times is necessary to determine whether an applicant satisfies the city-grade coverage rule. While at the *application* stage, the FCC will evaluate specific terrain to determine whether an applicant satisfies the city-grade coverage rule (47 C.F.R. § 73.315(a)) at the *allotment* stage, because it

² *Faye and Richard Tuck*, 3 FCC Rcd 53374 (1988).

cannot be determined what specific transmitter site ultimately will be utilized, a similar analysis is not undertaken. A limited exception allows a *petitioner* to use actual terrain, and for it to be considered by the Commission, in instances where the petitioner is seeking the upgrade of an existing station, and where the petitioner “has taken the affirmative steps of securing assurances from the proposed sites' owner that the transmitter site will be available.” *Id.* at ¶ 10. In this case, (1) petitioner KNTD, Inc. is not using anything other than average terrain since the reference site is only 7.7 km from the center of Chualar, and city-grade coverage therefore will be achieved without consideration of “actual” terrain, and further (2) although an existing tower, the site proposed is for reference purposes only, and it has not yet been settled whether that is the site that will be used when the allotment is granted.

Thus, this case is similar to *Meeker and Craig*, DA 00-2714 (MMB, Dec. 1, 2000), in which a petition for city of license change sought to use actual terrain in his population calculations. The Commission rejected that showing, stating:

Although the petitioner has cited several cases in which terrain factors were considered by the Commission, they did not involve a change of community of license proceeding to determine population coverage areas. Section 73.313 of the Commission’s Rules requires that all predictions or determination of coverage use the Commission’s standard propagation methodology, the F(50,50) curves, which assumes uniform or “average terrain.” At the allotment stage, the ultimate location of the transmitter site is generally unknown, and therefore we do not know the specific terrain along any given signal path. Therefore, we assume uniform terrain in determining coverage and to predict the distance from a theoretical reference site to the 1.0 mV/m service contour given the effective radiated power (“ERP”) and the nominal or reference antenna height above average terrain (“HAAT”) for the class of station. This yields a coverage area that is perfectly circular. Petitioner’s use of contours inappropriately takes into account terrain differences that restrict the predicted 1.0 mV/m signal coverage to less than perfectly circular coverage....

* * *
Our staff engineering analysis employed a prediction methodology at Craig in accordance with § 73.313 of the Commission’s Rules.

Id. at ¶¶ 7, 9.

Therefore, Coyote's use of actual terrain in determining the extent of the hypothetical Chualar 70 dbu service for purposes of determining the necessity of performing a *Tuck* analysis is also inappropriate. Using the proper methodology, only 2.2 % of the Salinas Urbanized Area will be covered. Accordingly, under Commission policy, no *Tuck* analysis is needed.

Under Commission Policy, a Change of Community is Warranted

As stated previously, the predecessor of KNT0, Inc. was granted authority to change the community of license of KNT0(FM) from Livingston, California to Dos Palos, California, in MM Docket No. 00-92. *Report and Order*, 15 FCC Rcd 20226 (2000). Although a construction permit currently is outstanding to relocate Station KNT0 and change the community of license of KNT0 to Dos Palos, California (File No. BPH-20010214ACG), that facility has not yet been constructed.

In Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 5 FCC Rcd 7094 (1990), the Commission addressed the issue of the removal of a sole local service from a community. While the Commission has stated, "in general," it does not believe that the public interest would be served by removing a community's sole local transmission service merely to provide a first local transmission service to another community,³ it also has repeatedly stated that the underpinning for this policy is that the public has a legitimate expectation that existing local service will continue. Once again, that policy consideration, however, does not come into play in this proceeding. Although the reallocation of Channel 240A from Dos Palos to Chualar will deprive Dos Palos of its sole allotment, it must be emphasized, and reemphasized, that the Channel 240A

³ See *Ardmore, Oklahoma, and Sherman, TX*, 6 FCC Rcd 7006, ¶ 7 (1991).

Dos Palos allotment has not ever been constructed. Therefore, as the Commission often has recognized, the Commission does not consider the removal of a channel under such circumstances “to present parallel concerns with loss of service, as it does not constitute a service upon which the public has become reliant.” *Oraibi and Leupp, AZ*, 14 FCC Rcd 13547, ¶ 6 (Chief, Allocations Branch 1999).

Coyote argues that allowing a community change, even where no “loss of service” will be created, has not been allowed except in instances where sites are not available to the prior community. Counterproposal at 6. Coyote is wrong. In *Oraibi*, as here, the rulemaking proponent sought to remove the sole local aural service allotment from a community. As here, the allotment had not yet commenced operation. The availability of a transmitter site was not an issue. In fact, the proponent proposed no site change. Nevertheless, reallocation of the channel at issue was approved. Similarly, in *Hague, NY and Addison, VT*, 13 FCC Rcd 20997 (Chief, Allocations Branch 1998), the Commission permitted a reallocation of the sole local aural service allotment to a new community to occur where service under the previous allotment had not yet commenced without requiring a showing that the previous allotment was defective or that a viable transmitter site was not available.

Chualar currently is the community of license only of non-commercial educational station KHDC(FM). Therefore, in this case, the proposed reallocation will allow Chualar to be allotted its first commercial local service. More importantly, in light of the fact that service never commenced to Dos Palos, the real comparison that should be made in this case is between the existing community of license, Livingston (the city that KNTO will be directly departing), and the new, proposed community of Chualar. Contrary to J&M’s assertions, Station KNTO continues to be licensed currently to Livingston. See Attachment 3. No modified license has

issued, nor will one issue, until a license application for a new community of licensed is filed and granted. Cf. J&M Comments at 4.⁴ Livingston will continue to be served by noncommercial educational Stations KLVN, Channel 202A and KYCC, Channel 206A, both of which also are licensed at Livingston. Moreover, in light of the overall greater service that KNTO will be able to provide by virtue of the reallocation, namely 60 dBu service to **56,316 persons** over the present KNTO licensed facilities in Livingston, the reallocation will result in a more efficient use of the allotment, and the public interest will be served by approving this proposed reallocation.

As to the “expressions of support” filed by residents of Dos Palos in support of “keeping KNTO at Dos Palos” (J&M Comments at 3-4), they must be looked at in perspective. As noted above, KNTO is not “now a Dos Palos station” (J&M Comments at 4), and the declarants’ statements evidently were made with that misconception in mind. Second of all, Station KNTO is a Spanish-language station, and even as a Livingston station, has provided service to Dos Palos. Therefore, the declarants’ desire for KNTO to provide “instantaneous communications in times of emergencies, as well as to address the unique needs and interests of Dos Palos” (J&M Comments at 3) can only be provided to the segment of the Spanish speaking population residing in Dos Palos. Not only are “unique needs” that it anticipates KNTO to address not identified, the letters appear to be “form letters” written by some third party, thereby reducing any insight or relevance they may otherwise have. The fact of the matter is that the transmitter site specified in KNTO’s outstanding construction permit is the same site as that already used by Class A Station KQLB, which is owned, in part, by principals of Coyote. That is an English-language station, that already is providing the same technical level of service as KNTO would have provided at

⁴ Accord, Report and Order, 15 FCC Rcd 20226, ¶ 7 (MMB 2000) (authorization for KNTO is modified “subject to the following conditions”).

Dos Palos, and is licensed to the nearby community of Los Banos. Additionally, Dos Palos also already receives city-grade service from Station KHTN(FM). How “unique” are the needs of the residents of Dos Palos, and how those alleged “needs” are not already being addressed by these existing local stations, is left to speculation.

Moreover, it should be noted that J&M’s motivation for filing its Comments in Opposition also should be considered. As J&M recites, J&M is licensee of Station KBOQ, Carmel, California. It operates on a second adjacent frequency, Channel 238. It appears that the only rational motivation for J&M, in particular, to attempt to prevent KNTO’s move is for private, anti-competitive reasons, possibly to enhance its own ability to move its station in the future.

The Commission tentatively has concluded that “a waiver of our restriction on removal of sole local transmission service is warranted” in this case. NPRM at ¶ 5. No new facts warrant deviation from that tentative conclusion. Accordingly, KNTO, Inc. respectfully requests that the proposed reallocation being considered in the *Notice of Proposed Rule Making* issued in this proceeding be granted, and that Channel 240A be reallocated from Dos Palos, California to Chualar, California, as proposed in this proceeding.

Respectfully submitted,

KNTO, INC.

By: _____

Dan J. Alpert

Its Attorney

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2120 N. 21st Rd.
Arlington, VA 22201
(703) 243-8690

November 28, 2001

ATTACHMENT 1

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

REPLY COMMENTS
MM DOCKET #01-248
KNTO, INC.
RE-ALLOT CHANNEL 240A
CHUALAR, CALIFORNIA
November 2001

TECHNICAL EXHIBIT

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REPLY COMMENTS
MM DOCKET #01-248
KNTO, INC.
RE-ALLOT CHANNEL 240A
CHUALAR, CALIFORNIA
November 2001

TECHNICAL STATEMENT

This technical statement and attached exhibit were prepared on behalf of KNTO, Inc., ("KI"), licensee of station KNTO, Channel 240A, Livingston, California. KI is also the petitioner in MM Docket #01-248, seeking the re-allotment of Channel 240A to Chualar, California.

BACKGROUND

During the comment period in MM Docket #01-248, two parties, in addition to KI, submitted comments. Coyote Communications, Inc., ("CCI") submitted comments and a counterproposal seeking the allotment of Channel 240A to Big Sur, California, in lieu of the proposed allotment to Chualar. CCI further claims that the city grade contour of the proposed Chualar facility encompasses 57% of the nearby Salinas Urbanized Area. J & M Broadcasting, Inc., submitted comments comparing the community of Chualar to Dos Palos. KI's comments are incorporated herein by reference.

DISCUSSION

CCI's claims that the theoretical 70 dBu contour of a re-allotted Chualar facility provides service to 57% of the Salinas Urbanized Area are incorrect. CCI's depiction of the 70 dBu contour is based on a maximum Class A facility with actual terrain characteristics used in the calculation of the contour. KI's depiction of the typical Class A city grade radius was calculated

using uniform terrain conditions and a radii of 16.1 kilometers based on the Commission's f(50/50) curves for a 6.0 kilowatt/100 meter height above average terrain facility, which complies with the Commission's Allocation Branch standard practices. As denoted in MM Docket #91-58 (Caldwell, College Station, and Gause, Texas), the Commission notes uniform terrain is assumed for the 70 dBu signal for rule making proceedings.¹ Similarly, in MM Docket #00-159 (Thermopolis and Story, Wyoming), the Chief of the Allocations Branch notes that the use of uniform terrain for the projection of FM stations in allotment proceedings is consistent with the Commission's policy.² As such, in keeping with Allocations Branch policy, the 70 dBu reference contour from the proposed Chualar site encompasses 2.2% of the Salinas Urbanized Area and, as such, a demonstration pursuant to the Faye and Richard Tuck decision is not necessary.

Further, CCI's proposed allotment of Channel 240A to Big Sur, California, is not comparable to the proposed Chualar allotment. A maximum Class A facility at Big Sur, California, will provide 60 dBu service to 6,550 persons within 2,498.3 square kilometers.³ In contrast, the proposed Chualar facility will provide 60 dBu service to 205,971 persons in 2,498.3 square kilometers, over thirty times the population of the Big Sur proposal. Further, Big Sur is not listed on the 2000 Census of California as either a town or a Census Designated Place. CCI's engineering data does not include the boundaries of Big Sur, and as such, it cannot be ascertained whether the channel will comply with the requisite rules of coverage of 100% of the community.

-
- 1) Memorandum Opinion and Order, MM Docket 91-58, FCC 98-165 at Paragraphs 10 and 11.
 - 2) Report and Order, MM Docket 00-159, at Paragraph 9, in response to issues raised in Paragraph 6.
 - 3) Based on uniform terrain, service radius 28 kilometers.

KI has, however, determined that should the Commission deem Big Sur ultimately deserving of a FM allotment, Channel 236A can be allotted to Big Sur at the site proposed by CCI. Attached, as Exhibit #1, is a §73.207 spacing study from the proposed CCI site showing that Channel 236A meets the minimum distance separation requirements to all licensed, applied for or proposed facilities. As such, Channel 236A could be allotted should the Commission find that Big Sur is worthy of an allotment, without the need to compare the proposal at Chualar to Big Sur. Therefore, in summary, KI restates that it is proposing the Commission re-allot Channel 240A to Chualar California, and if necessary, allot Channel 236A to Big Sur, California.⁴

The forgoing was prepared on behalf of KNTO, Inc., by Graham Brock, Inc., its Technical Consultants. All data contained herein was extracted from the CDBS database and the PL 94-171 2000 Census files. We assume no liability for errors or omissions in either database that may be adverse to the requests contained herein.

4) KI expressed no interest in a station at Big Sur, and the suggestion of an alternative channel should not be construed as an expression of interest.

REPLY COMMENTS
MM DOCKET #01-248
KNTO, INC.
RE-ALLOT CHANNEL 240A
CHUALAR, CALIFORNIA
November 2001

EXHIBIT #1

ALLOCATION STUDY FOR BIG SUR, CALIFORNIA
 USING COYOTE COMMUNICATIONS, INC. SITE AS REFERENCE

REFERENCE		DISPLAY DATES
36 15 28 N	CLASS A	DATA 11-16-01
121 49 28 W	Current rules spacings	SEARCH 11-16-01
----- CHANNEL 236 - 95.1 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD236	236A	Big Sur	CA	0.0	0.00	115.0	-115.00
ADD	36 15 28	121 49 28	0.000 kW	0M	0.0	71.4	
Alternate channel proposal							
KBOQ	238A	Carmel	CA	5.7	32.87	31.0	1.87
LIC CN	36 33 09	121 47 17	1.700 kW	192M	20.4	19.3	
	J & M Broadcasting, Inc.			BLH-19931216KF			
ALLO	290A	Carmel Valley	CA	46.8	13.55	10.0	3.55
VAC	36 20 28	121 42 51	0.000 kW	0M	8.4	6.2	
				RM			
KOTR	235B1	Cambria	CA	139.7	106.68	96.0	10.68
LIC CN	35 31 26	121 03 40	25.000 kW	100M	66.3	59.7	
	Central Coast Comm. B/cting,			BLH-19890206KA			
KHOP	236B	Oakdale	CA	33.8	206.19	178.0	28.19
LIC CN	37 47 34	120 31 08	29.500 kW	193M	128.1	110.6	
	Citadel Broadcasting Company			BLH-19850326KZ			
KRTY	237A	Los Gatos	CA	354.0	105.67	72.0	33.67
LIC CN	37 12 17	121 56 56	0.870 kW	262M	65.7	44.8	
	KRTY, Ltd.			BMLH-19930521KA			
KBAY	233B	Gilroy	CA	2.4	105.67	69.0	36.67
LICZCN	37 12 33	121 46 30	30.000 kW	179M	65.7	42.9	
	Infinity Radio License Inc.			BLH-19990721KG			
KAAX.C	236A	Avenal	CA	99.4	159.93	115.0	44.93
CP CN	36 00 40	120 04 26	0.920 kW	200M	99.4	71.5	
	Avenal Educational Services			BMPED-19960826IA			

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

State of Georgia)
St. Simons Island) ss:
County of Glynn)

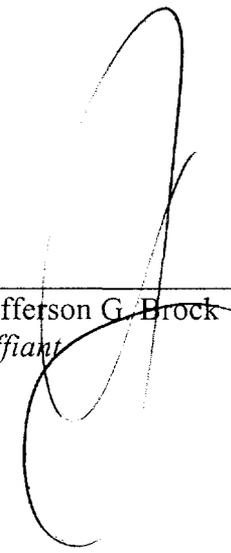
JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by KNT0, Inc., licensee of Radio Station KNT0, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

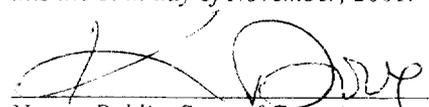
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 19th day of November, 2001.

Jefferson G. Brock
Affiant



*Sworn to and subscribed before me
this the 19th day of November, 2001.*


Notary Public, State of Georgia
My Commission Expires: April 20, 2002

ATTACHMENT 2

U.S. Census Bureau

American Fact

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Quick Tables

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Rela

DP-1. Profile of General Demographic Characteristics: 2000
 Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data
 Geographic Area: **Chualar CDP, California**

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see
<http://factfinder.census.gov/home/en/datanotes/expsf1u.htm>.

Subject	Number	Percent
Total population	1,444	100.0
SEX AND AGE		
Male	774	53.6
Female	670	46.4
Under 5 years	162	11.2
5 to 9 years	180	12.5
10 to 14 years	139	9.6
15 to 19 years	139	9.6
20 to 24 years	164	11.4
25 to 34 years	249	17.2
35 to 44 years	187	13.0
45 to 54 years	116	8.0
55 to 59 years	41	2.8
60 to 64 years	16	1.1
65 to 74 years	30	2.1
75 to 84 years	15	1.0
85 years and over	6	0.4
Median age (years)	23.0	(X)
18 years and over	875	60.6
Male	469	32.5
Female	406	28.1
21 years and over	780	54.0
62 years and over	59	4.1
65 years and over	51	3.5
Male	18	1.2
Female	33	2.3
RACE		
One race	1,382	95.7
White	223	15.4
Black or African American	6	0.4
American Indian and Alaska Native	8	0.6
Asian	46	3.2
Asian Indian	4	0.3
Chinese	0	0.0
Filipino	41	2.8
Japanese	1	0.1
Korean	0	0.0
Vietnamese	0	0.0
Other Asian ¹	0	0.0
Native Hawaiian and Other Pacific Islander	0	0.0
Native Hawaiian	0	0.0
Guamanian or Chamorro	0	0.0
Samoan	0	0.0
Other Pacific Islander ²	0	0.0

ATTACHMENT 3

 **Federal Communications Commission**

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[Help](#) | [Home](#)

Search returned: 1 matching station

Station Search Results

KNTD	1009	FM	KNTD, INC.	LICENSED	Click for Details
------	------	----	------------	----------	-----------------------------------



[Help](#) | [Home](#)

Station Search Details

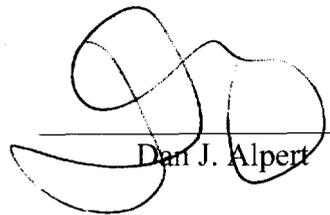
Call Sign:	KNTO
Facility Id:	1009
Community of License:	LIVINGSTON, CA
Service:	FM
Fac Type:	FM STATION
Status:	LICENSED
Status Date:	
Frequency:	95.9
Channel:	240
Lic Expir:	12/01/2005
Licensee:	KNTO, INC.
Address:	4043 GEER ROAD
Address 2:	
City:	HUGHSON
State:	CA
Zip Code:	95326
Call Sign History	<u>View Call Sign History</u>

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that on November 28, 2001, the foregoing document has been served upon the following by First Class Mail:

John Wells King, Esq.
Garvey, Schubert & Barer
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Washington, DC 20007-3501

Jerrold Miller, Esq.
Miller & Miller
P.O. Box 33003
Washington, DC 20033



Dan J. Alpert