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February 11, 2002

OUR FILE NO.
20828-00101-63
1554-101-63

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William F. Caton, Acting Secretary
Federal Communications Commission
C/o Vistronix, Inc.
236 Massachusetts Avenue, NW, Suite 110
Washington, DC 20002

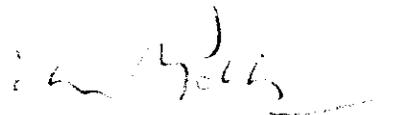
RE: MM Docket N. 00-245 /
RM-9971
RM-10185
RM-10186
Alberta and Dinwiddie, VA
Whitakers and Garysburg, NC

Dear Mr. Caton:

Transmitted herewith, on behalf of MainQuad Broadcasting, Inc., are an original and four copies of a **RESPONSE TO ORDER TO SHOW CAUSE** in reply to the Commission's Order in the above-referenced proceeding.

Should further information be necessary regarding this submission, kindly communicate directly with this office.

Sincerely,



John M. Pelkey

Enclosures
JMP/blr

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FEB 11 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of]	
]	
Amendment of Section 73.202(b),]	MM Docket No. 00-245
Table of Allotments,]	RM-9971
FM Broadcast Stations,]	RM-10185
(Alberta and Dinwiddie, Virginia,]	RM-10186
Whitakers and Garysburg, North Carolina]	

TO: Chief, Allocations Branch

RESPONSE TO ORDER TO SHOW CAUSE

MainQuad Broadcasting, Inc. ("MainQuad"), through counsel, hereby responds to the Order to Show Cause ("Show Cause Order") released by the Chief, Allocations Branch, in the above-referenced proceeding. In that Show Cause Order, the staff instructs MainQuad, which is the licensee of FM broadcast station WSMY-FM, Alberta, Virginia, to explain why the WSMY-FM license should not be modified to specify operation on 299A in lieu of Channel 276A so as to permit the allocation of Channel 276A to Garysburg, North Carolina. The proposed allocation of Channel 276 to Garysburg arises as the result of a counterproposal filed by Garysburg Radio in response to MainQuad's proposal in the instant proceeding to reallocate Channel 276 from Alberta to Whitakers, North Carolina.

As is set forth in detail below, the proposed modification of the WSMY-FM license would significantly and severely harm the public inasmuch as it would prevent nearly 114,000 people from receiving the additional service that would be realized through allocation of Channel 276 to Whitakers. At the same time, the proposed

modification would yield no offsetting public benefit inasmuch as the desired goal of providing Garysburg with first local service can be achieved without depriving Whitakers of service if, as has now been proposed by a MainQuad affiliate in a recently-submitted Petition for Rulemaking, the community of license of MainQuad's WPTM(FM) is changed to Garysburg. As a result, the public interest would be far better served if, rather than adopting the proposal set forth in the Show Cause Order and modifying WSMY-FM's license to specify operations on Channel 299A in Alberta, the Commission were to instead adopt MainQuad's proposal to modify WSMY-FM's license to specify operation on Channel 276C3 in Whitakers.

I. Modification of the WSMY-FM License to Specify Operations on Channel 299 Would Preclude the Initiation Of New Service to Whitakers, North Carolina.

As the Order to Show Cause recognizes, the Commission's decision to issue the Show Cause Order stems from a counterproposal filed in MM Docket No. 00-245 by an entity calling itself Garysburg Radio. The Garysburg Radio counterproposal was filed in response to a proposal made by MainQuad to reallocate Channel 276A from Alberta, Virginia, to Whitakers, North Carolina, and to allocate Channel 299A to Alberta. The Garysburg Radio and MainQuad proposals are fundamentally inconsistent with one another inasmuch as the allocation of Channel 276 to Garysburg would preclude the allocation of that channel to Whitakers.

As has been explained at great length in the previous filings submitted by MainQuad in MM Docket No. 00-245,¹ allocation of Channel 276A to Whitakers would

¹ See Reply Comments of MainQuad Broadcasting, Inc., filed February 13, 2001, at pp. 2-12; Reply Comments of MainQuad Broadcasting, Inc., filed August 3, 2001, at pp. 3 - 5;

better serve the public interest than would the allocation of that channel to Garysburg. Specifically, allocation of Channel 276 to Whitakers rather than Garysburg would permit the provision of additional service to nearly 114,000 more people than would be the case if the channel were allocated to Garysburg -- in large part due to the fact that allocating Channel 276 to Whitakers would permit operation of a C-3 facility on that channel, whereas allocation of Channel 276 to Garysburg would permit the operation of only a Class A facility. Although Garysburg is slightly larger than Whitakers, the Commission has previously held that such a difference is *de minimis* in view of the substantial disparity in the size of the populations that would receive additional service. *See Seabrook, Huntsville, Bryan, Victoria, Kennedy and George West, Texas*, 10 FCC Rcd. 9360 (1995). *See also Sparta and Buckhead, Georgia*, 16 FCC Rcd. 2169 (2001). Moreover, as is explained in the next section, MainQuad has taken steps to permit the provision of first local service to *both* Whitakers and Garysburg -- with the result that there is no need to deprive Whitakers of first local service and 114,000 listeners of additional service.

II. The Reallocation of Channel 276 to Garysburg is Unnecessary.

Underlying the Order to Show Cause is the assumption that Garysburg is a community in need of first local service. MainQuad does not disagree with this assumption. MainQuad is intimately familiar with Garysburg inasmuch as it has been providing service to Garysburg and the surrounding area for many years through the operation by affiliated entities of two stations, WCBT(AM) and WPTM(FM), which

currently have Roanoke Rapids, North Carolina, as their community of license.

Garysburg is a bedroom community of Roanoke Rapids.

In order to ensure that Garysburg will enjoy all of the rights and privileges associated with having a broadcast facility allocated to it, MainQuad Communications, Inc. ("MCI"), has filed with the Commission a Petition for Rulemaking in which it has proposed to change the community of license of WPTM(FM) from Roanoke Rapids to Garysburg. Favorable action on the MCI Petition for Rulemaking would provide Garysburg with the first local service that the Commission apparently deems in the Show Cause Order to be of great importance while, at the same time, also allowing the residents of Whitakers to enjoy first local service.²

Moreover, MainQuad's proposal would allow the provision of first local service to Garysburg to take place immediately upon the adoption of MCI's proposed rulemaking. WPTM(FM) already provides city-grade service to Garysburg. As a result, once MCI's rulemaking is adopted, it can be implemented simply by submitting an FCC Form 302-FM to modify the WPTM(FM) license to specify Garysburg as that station's community of license. By contrast, if the Commission were to adopt the Garysburg Radio proposal and to provide Garysburg with its first local service through the reallocation of Channel 276 from Alberta to Garysburg, Garysburg would not enjoy service from the

² Roanoke Rapids, which is WPTM(FM)'s present community of license, is the community of license of five broadcast stations other than WPTM(FM). Specifically, according to the Commission's CDBS database, Roanoke Rapids is the community of license of one AM station (WCBT), three FM stations other than WPTM(FM) (WPGT, WRTP-FM and WZRU) and one television station (WUNP-TV). The Petition for Rulemaking does not propose a change in WPTM(FM)'s channel. On that channel, WPTM(FM) is fully-spaced to all other stations and places a city-grade contour over Garysburg from its current site. Because of these factors, the proposed change in WPTM(FM)'s community of license has a very high probability of being adopted. Nevertheless, if the Commission requires absolute certainty that the WPTM(FM)

Channel 276 facility until (1) the Commission opens a window for the submission of applications, (2) an auction is held, and (3) a facility is constructed. Given the extremely slow pace with which windows for new facilities have been opened, and the delays that are part and parcel of station construction, it is unlikely that the new facility would be constructed for years.³

III. Alberta Would Not Lose Service Under MainQuad's Proposal.

Also apparently underlying the Show Cause Order is a concern that MainQuad's proposal to reallocate Channel 276 from Alberta to Whitakers would not permit the retention of the only local service in Alberta. This concern is unfounded. Consistent with the Commission's holding in *Llano and Marble Falls, Texas*, 12 FCC Rcd 6809(1997), MainQuad has made the requisite commitment to apply for its proposed substitute channel at Alberta if the channel is allocated and, if it is awarded the construction permit, to construct the facility promptly. Such a commitment satisfied the Commission's concerns in Llano and should provide like assurance in the instant case. Furthermore, as is explained below, the present case is different than Llano inasmuch as the Alberta station has not been operational for most of its short existence -- with the result that there would be no de facto withdrawal of service. Nevertheless, to the extent that the Commission continues to be concerned about withdrawal of service, MainQuad would

community of license will be changed to Garysburg, it should defer action on the Order to Show Cause until after the completion of the WPTM(FM) rulemaking.

³ MainQuad, on behalf of its affiliate MCI, hereby commits to follow through to conclusion the rulemaking to reallocate Channel 272 from Roanoke Rapids to Garysburg as necessary to provide first local service to Garysburg and to file the requisite application to modify the WPTM(FM) license to specify Garysburg as the station's community of license -- thus ensuring that Garysburg receives its first local service. As a result, the Commission's decision to

remind the Commission that the same problem was overcome in Llano by requiring the proponent to continue operations in the old community of license until the community's new station became operational. The same approach could be used in the present case.

As has been noted above, Alberta currently is receiving local service in theory only. Slightly more than one year ago, MainQuad's WSMY-FM initiated service to Alberta on Channel 276A. Almost immediately, however, MainQuad began receiving complaints that WSMY-FM was causing interference to Television Channel 12 in Richmond. So as not to antagonize its future listeners and to accommodate the Mayor of Alberta, who had requested that MainQuad cease operations of WSMY-FM, MainQuad took WSMY-FM silent. Although it has on two additional occasions attempted to resume operations of WSMY-FM, MainQuad on both occasions again took the station silent because of the continued interference being experienced by the residents of Alberta. In the nearly 14 months that have elapsed since WSMY-FM first commenced operations, the station has been on the air for a grand total of less than one month.

MainQuad has found an alternative transmitter site from which it is hoped that no interference will be caused to Channel 12. MainQuad expects that it will be filing an application to move to that site shortly. WSMY-FM cannot operate from that site, however, on Channel 299 in accordance with the spacing requirements imposed by Section 73.207 of the Commission's rules, which means that MainQuad would either be forced to locate a new tower from which to operate⁴ or to operate under Section 73.215 of the Commission's rules. Operation pursuant to Section 73.215, in turn, would force the

allocate Channel 276 to Whitakers rather than Garysburg would be grounded on a firm commitment by the rulemaking proponent and not on a conjectural future change in the rules.

⁴ Normally, the Commission will not adopt a rulemaking proposal that requires a licensee to change its transmitter site.

station to incur the additional expense of a directional antenna⁵ or to reduce power – in either case leading to facilities that are operating at less than the full facilities authorized for Class A stations and that, as a result, would not be providing the fullest possible benefit to the public.

IV. Conclusion.

The Order to Show Cause seeks to implement a Counterproposal that would deprive more than 100,000 people of service. As a result, it is contrary to the public interest. Moreover, the Counterproposal at this point carries with it no public interest benefits whatsoever. The Counterproposal's sole prior public interest benefit, namely, the provision of first local service to Garysburg, is no longer of significance inasmuch as MCI's proposal to modify the license of WPTM(FM) to specify Garysburg as that station's community of license means that Garysburg will now enjoy its own local station. Thus, in determining whether Channel 276 should be allocated to Garysburg or Whitakers, the Commission is now confronted with the situation where there is no public benefit in allocating the channel to Garysburg and there is a substantial public benefit in

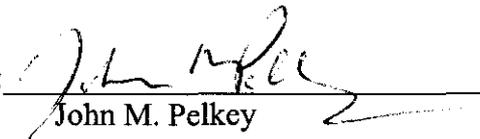
⁵ MainQuad has committed to apply for and construct an Alberta station operating on Channel 299 if its proposal to reallocate Channel 276 to Whitakers as a Class C3 station is adopted. That commitment, even if it results in MainQuad being required to construct a new tower, makes economic sense given the increase in the value of the Channel 276 facility resulting from the increase in Class and the designation of Whitakers as the community of license. If the MainQuad proposal is not adopted, however, there is no source of increased revenue to offset the additional expenses resulting from the modification of the WSMY-FM license to specify operation on Channel 299.

In this regard, it becomes important that the Commission, if it grants the proposed modification of the WSMY-FM license to specify operation on Channel 299, take steps to ensure that Garysburg Radio can abide by its commitment to reimburse MainQuad for the reasonable costs incurred by it in effectuating the channel change. At a minimum, the Commission should require Garysburg Radio to identify its principals and have those principals submit declarations affirming their obligations to reimburse MainQuad for such costs. As matters currently stand, the

allocating the channel to Whitakers. At the same time, the citizenry of Alberta would not be deprived of service as a result of the allocation of Channel 276 to Whitakers since, as a real world matter, it is not currently receiving service and, in any event, MainQuad has committed to provide service to Alberta if it is awarded the new channel that it has proposed for Alberta. As a result, MainQuad has demonstrated that there is good cause not to modify the license of WSMY-FM to specify operations on Channel 299 in lieu of Channel 276 and the proposed modification should not be adopted.

Respectfully submitted,

MAINQUAD BROADCASTING, INC.

By: 
John M. Pelkey

Garvey, Schubert & Barer
1000 Potomac Street, NW
Fifth Floor
Washington, DC 20007
202/965-7880

February 11, 2002

Commission does not even have a record as to the identity of the principals of Garysburg Radio, an organization that is not a Commission licensee.

Declaration of Daniel Berman

I, Daniel Berman, declare the following to be true under penalty of perjury:

1. I am the President of MainQuad Broadcasting, Inc., licensee of WSMY-FM. In that role, I have first-hand knowledge of the facts set forth in the foregoing Response to Order to Show Cause.

2. I have reviewed the foregoing Response to Order to Show Cause. The factual statements made therein are correct to the best of my knowledge, information and belief.

Dated February 11, 2002

A handwritten signature in black ink, appearing to read "Daniel Berman", written over a horizontal line.

Daniel Berman

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February 8, 2002

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William F. Caton, Acting Secretary
Federal Communications Commission
C/o Vistrionix, Inc.
236 Massachusetts Avenue, NE, Suite 110
Washington, DC 20002

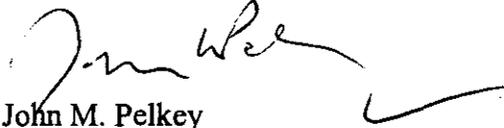
RE: Petition for Rulemaking
Roanoke Rapids, North Carolina

Dear Mr. Caton:

Transmitted herewith, on behalf of MainQuad Communications, Inc., are an original and four copies of a **PETITION FOR RULEMAKING**, requesting the reallocation of Channel 272A from Roanoke Rapids, North Carolina, to Garysburg, North Carolina.

Should further information be necessary regarding this submission, kindly communicate directly with this office.

Sincerely,


John M. Pelkey

Enclosures
JMP/blr

Before The
Federal Communications Commission

Washington, D.C. 20554

In the Matter of]
]]
Amendment of Section 73.202(b)]
]]
Table of Allotments]
FM Broadcast Stations]
Roanoke Rapids, North Carolina, and]
Garysburg, North Carolina]

File No.

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FEB 11 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch

Petition for Rulemaking

MainQuad Communications, Inc. ("MainQuad"), licensee of WPTM(FM), Roanoke Rapids, North Carolina, through counsel, hereby respectfully requests that the Commission institute a rulemaking to amend Section 73.202(b) of the Commission's rules, the Table of FM Allotments, to reallocate Channel 272A from Roanoke Rapids, North Carolina, to Garysburg, North Carolina, and to modify the license of WPTM(FM) to specify operation on Channel 272A at Garysburg, North Carolina.¹ In support of this proposal, MainQuad states as follows:

MainQuad is the licensee of WPTM(FM), which operates on Channel 272A. WPTM(FM)'s community of license is Roanoke Rapids, North Carolina. MainQuad seeks to change WPTM(FM)'s community of license from Roanoke Rapids, North Carolina, to Garysburg, North Carolina, because Garysburg, North Carolina has a need for local service whereas Roanoke Rapids is amply served by numerous stations. See *Modification of FM and TV Authorizations to Specify a New Community of License*, 4

FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990) (hereinafter referred to as "*Modification of FM and TV Authorizations*").

I. Allocation of Channel 272 to Garysburg rather than Roanoke Rapids would Better Serve the Commission's Allocations Priorities.

Garysburg, North Carolina, is an incorporated community. Government of the community is through an elected mayor and commissioners. The town supports its own police force and is home to several churches and numerous businesses, including La Kitchen Delight, Turner's Auto Sales, Garysburg Convenience Store, Agrijohn Homes and J & B Childcare Center. It has its own post office and zip code. It is home to the Garysburg Elementary School, the Garysburg Family Resource Center and the Garysburg Community Center. Garysburg currently has no broadcasting service allocated to it, however.²

By contrast, Roanoke Rapids, which presently is WPTM(FM)'s community of license, currently enjoys service from 6 broadcast stations. Specifically, according to the Commission's CDBS database, Roanoke Rapids is the community of license of one AM station (WCBT), three FM stations other than WPTM(FM) (WPGT, WRTP-FM and WZRU) and one television station (WUNP-TV).

¹ Because the requested allocation of Channel 272 to Garysburg is mutually exclusive with the WPTM(FM) license, the proposal qualifies for treatment under Section 1.420(i) of the Commission's rules.

² There is currently pending a Counterproposal in MM Docket 00-245 seeking to allocate Channel 276 to Garysburg as that community's first local service. The Commission staff, apparently preliminarily persuaded that Garysburg is in need of first local service, has issued an Order to Show Cause that would require WSYM-FM, the licensee of which is a MainQuad affiliate, to change channel so as to accommodate the allocation of a channel to Garysburg. That counterproposal has not been adopted, however.

As the Commission explained in *Revision of FM Assignment Policies and Procedures*, the FM allotment priorities are: (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters (with co-equal weight being given to priorities (2) and (3)). 90 FCC2d 88, 91 (1982). More recently, the Commission has acknowledged that, because “there are virtually no populated areas of the country where our higher allotment priorities, such as first reception service, have not been attained[,] . . . as a practical matter, provision of first local service is the highest of our allotment priorities which remains in any significant degree unsatisfied.” *Modification of FM and TV Authorizations*, 5 FCC Rcd at 7096 (¶ 16). Reallocation of Channel 272 from Roanoke Rapids to Garysburg would allow the Commission to achieve this de facto highest of allotment priorities.

II. The Reallocation of Channel 272 from Roanoke Rapids to Garysburg Can be Accomplished in Full Compliance With the Commission’s Policies and Engineering Criteria.

Moreover, the proposed reallocation can be effectuated in full compliance with the Commission’s policies and rules. In that regard, two criteria come into play: first, does the proposal allow the continuation of service in the former community of license?; second, does the proposal satisfy the Commission’s engineering standards? The instant proposal satisfies both of these criteria.

With respect to the first criterion, because Roanoke Rapids would continue to enjoy service from numerous broadcast outlets after Channel 272 is reallocated to Garysburg, the proposal is consistent with the procedures for reallocating a channel from

one community to another that were sanctioned by the Commission in *Modification of FM and TV Authorizations*.

The proposal also satisfies the second criterion inasmuch as it complies with the Commission's spacing and city-grade coverage requirements. As is set forth in the table included as Exhibit 1 hereto, Channel 272A can be allocated to Garysburg in full compliance with the spacing rules through the imposition of a 9.5 km site restriction.³ The map included as Exhibit 2 depicts that, from the specified reference coordinates, the facility would be able to achieve coverage of all of Garysburg with a principal community contour.

III. MainQuad Will Apply for and Construct, as Applicable, the Facilities Necessary to Allow WPTM(FM) to Place the Requisite City-Grade Signal Over Garysburg.

MainQuad hereby commits that, if Channel 272A is allocated to Garysburg, it will file the requisite application for WPTM(FM) so as to allow the station to place the requisite signal over Garysburg and to promptly implement that authorization, through construction or otherwise, upon grant of the application. In this regard, MainQuad notes that its engineer has concluded that WPTM(FM) places a city-grade signal over Garysburg with its currently-licensed facilities. As a result, favorable action on the instant proposal would permit an immediate commencement of first local service to Garysburg.

³ The reference coordinates used in the spacing study are: 36°, 29', 22" NL; 77°, 39', 08" WL.

Conclusion

For the reasons stated above, the public interest would be served by the reallocation of Channel 272A from Roanoke Rapids, North Carolina, to Garysburg, North Carolina. Accordingly, MainQuad respectfully requests that the Commission institute a rulemaking proceeding that would amend the FM Table of Allotments as follows:

Community	Present	Proposed
Roanoke Rapids, North Carolina	272A	-----
Garysburg, North Carolina	-----	272A

MainQuad also requests that the WPTM(FM) license be modified to specify Garysburg as the station's community of license.

Respectfully submitted,

MAINQUAD COMMUNICATIONS, INC.

By:


John M. Pelkey
Its Attorney

Garvey, Schubert & Barer
5th Floor, 1000 Potomac Street, N.W.
Washington, DC 20007

202/965-7880

Date: February 8, 2002

Exhibit 1

Spacing Study

WPTM
Proposed Allocation to Garysburg

REFERENCE
36 29 22 N
77 39 08 W

CLASS = A
Current Spacings

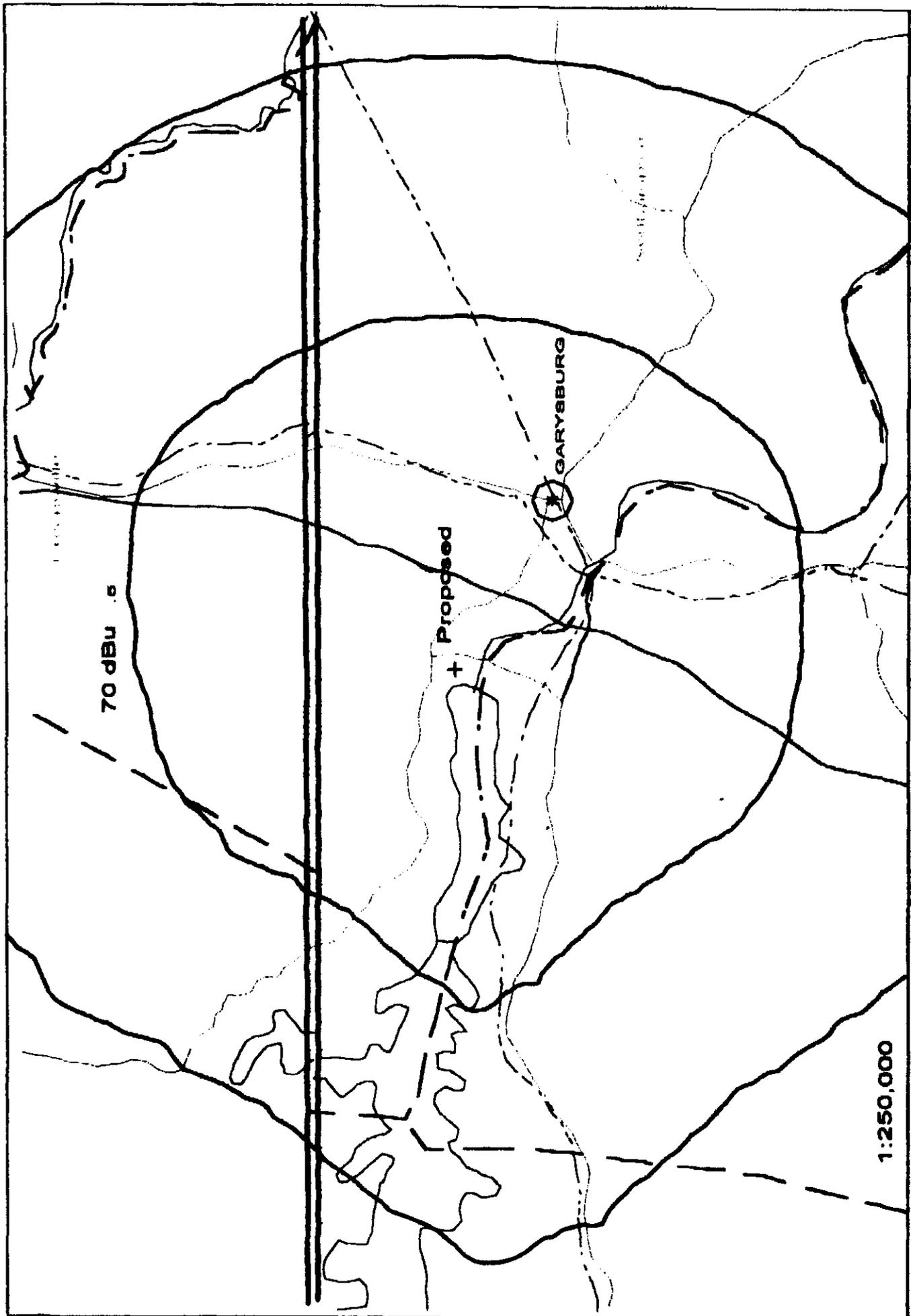
DISPLAY DATES
DATA 01-19-02
SEARCH 02-07-02

----- Channel 272 - 102.3 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WPTM	LIC 272A	Roanoke Rapids	NC	8.59	280.4	115.0	-106.41
ALLO	USE 272A	Roanoke Rapids	NC	8.59	280.4	115.0	-106.41
WERXFM	LIC 273C1	Columbia	NC	133.43	118.1	133.0	0.43
ALLO	USE 273A	Louisburg	NC	72.49	233.5	72.0	0.49
WHLQ	LIC 273A	Louisburg	NC	77.17	238.0	72.0	5.17
RDEL	DEL 272A	Goldsboro	NC	125.37	195.0	115.0	10.37
WRXL	LIC 271B	Richmond	VA	125.44	5.5	113.0	12.44
ALLO	USE 271B	Richmond	VA	125.45	5.6	113.0	12.45
ALLO	USE 272A	Goldsboro	NC	127.98	194.7	115.0	12.98
RADD	ADD 272A	Smithfield	NC	128.28	208.5	115.0	13.28
WKIX	LIC 272A	Goldsboro	NC	128.73	199.9	115.0	13.73
AP270	APP 270L1	Washington	VA	44.76	297.0	29.0	15.76
WERXFM	LIC 273C2	Columbia	NC	133.43	118.1	106.0	27.43
ALLO	USE 273C1	Columbia	NC	160.90	122.0	133.0	27.90
WLQMFM	LIC 269A	Franklin	VA	61.03	68.6	31.0	30.03
ALLO	USE 269A	Franklin	VA	62.77	65.2	31.0	31.77
WJMH	LIC 271C	Reidsville	NC	206.70	264.1	165.0	41.70
ALLO	USE 271C	Reidsville	NC	206.91	264.0	165.0	41.91
WBKU.C	CP 219C2	Ahoskie	NC	59.13	137.6	15.0	44.13
WBKU.A	APP 219C2	Ahoskie	NC	59.13	137.6	15.0	44.13
WBKU.C	CP 219C2	Ahoskie	NC	59.25	137.7	15.0	44.25
ALLO	USE 275B	Norfolk	VA	117.15	74.9	69.0	48.15
WOWI	LIC 275B	Norfolk	VA	117.15	74.9	69.0	48.15
W274AB	LIC 274D	Petersburg	VA	79.87	14.7	26.0	53.87
W274AK	LIC 274D	Wilson	NC	82.75	194.4	26.0	56.75
ALLO	VAC 274C1	Appomattox	VA	138.31	313.0	75.0	63.31
CP273	CP 273L1	Williamsburg	VA	120.36	40.6	56.0	64.36
WWHV.C	CP 271A	Virginia Beach	VA	137.56	77.3	72.0	65.56
WIKS	LIC 270C1	New Bern	NC	148.89	163.6	75.0	73.89
ALLO	USE 270C1	New Bern	NC	148.89	163.6	75.0	73.89

Exhibit 2

City-grade Coverage



Proposed 272A 6kW 153.76M AMSL	Garysburg 272A
N. Lat. 36 29 22 W. Lng. 77 39 06	- 02/02

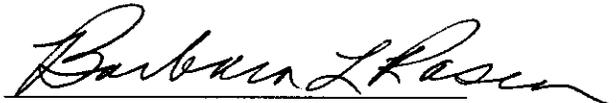
CERTIFICATE OF SERVICE

I, Barbara L. Rascon, a secretary in the law offices of Garvey, Schubert & Barer, hereby certify that I have on this 11th day of February, 2002, sent copies of the enclosed **"RESPONSE TO ORDER TO SHOW CAUSE"** by hand-delivery or first-class, United States mail, postage prepaid, to the following:

Anne Goodwin Crump, Esq.
Fletcher, Heald & Hildreth, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, VA 22209-3801
(Counsel for Garysburg Radio)

John D. Poutasse, Esq.
Leventhal, Senter & Lerman P.L.L.C
2000 K Street, NW, Suite 600
Washington, DC 20006-1809
(Counsel for Dinwiddie Radio Company)

R. Barthen Gorman
Federal Communications Commission
Mass Media Bureau
445 12th Street, SW, Room 3-A224
Washington, DC 20554


Barbara L. Rascon

February 11, 2002