

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

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In the Matter of )  
)  
Amendment of Section 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations. )  
(Amboy, California) )

MB Docket No. 02-124  
RM-10446

JUL 15 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

TO: John A. Karousos  
Assistant Chief, Audio Division  
Office of Broadcast License Policy  
Media Bureau

**COUNTERPROPOSAL OF CAMERON BROADCASTING, INC.**

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## SUMMARY

Cameron Broadcasting, Inc. hereby proposes certain reallocations which, if approved and implemented, would result in a new competitive local service to one community and a gain in service to more than 1,000,000 persons, while retaining the proposal (advanced in the *NPRM* herein) to provide Amboy, California with its first local FM service. Consent from all but two of the affected licensees/permittees has been obtained, and the counterproposal complies in all other respects with the applicable rules and policies.

Accordingly, for the reasons set forth herein, Cameron urges the Commission to accept this Counterproposal for public comment.

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**COUNTERPROPOSAL OF CAMERON BROADCASTING, INC.**

1. Cameron Broadcasting, Inc. ("Cameron") hereby submits this Counterproposal to the Notice of Proposed Rule Making ("*NPRM*"), DA 02-124, released May 24, 2002, in the above-captioned proceeding. Cameron proposes the creation of a new FM allotment at Desert Center, California, which would be mutually exclusive with the allotment proposed in the instant proceeding for Amboy, California. In addition, Cameron proposes certain other modifications of the Table of Allotments, as follows:

<b>Community</b>	<b>Channels</b>	
	<b>Present</b>	<b>Proposed</b>
Desert Center, California	288A	237A, 288A
Amboy, California	237A (proposed)	231A
Henderson, Nevada	231C, 238C, 263C	230C, 238C, 263C
Parker, Arizona	230C3, 257C2	252B1, 257C2
Kingman, Arizona	234C, 261C2	261C2
Pahrump, Nevada	236A, 298C	234C, 250A, 298C
Caliente, Nevada	233C1	232C1
Baker, California	235B1, 268B	268B, 276B1
Boulder City, Nevada	274C	274C0
Mohave Valley, Arizona	229A	232A
Seligman, Arizona	277A	234C2

### Preliminary Matters

2. Agreements have been entered into with all of the stations that are required to make changes except KMXB(FM), Henderson, Nevada, and KKBK(FM), Baker, California. Each of the other licensees (or, in the case of the Parker, Arizona allotment, permittee) has provided a statement of consent to the proposed changes. Cameron hereby states that it will reimburse the licensees (or permittee) of all of the affected stations for the changes required to be made to their facilities.<sup>1</sup> Pursuant to Section 1.420(j) of the Commission's Rules, Cameron states that it has not paid or promised to pay, directly or indirectly, any licensee or permittee for withdrawing any expression of interest, dismissing an application or forbearing to file an express of interest.

3. The Commission has stated that it will not require more than two stations to change channels involuntarily. *Columbus, Nebraska*, 59 R.R.2d 1185 (1986). Here, all stations proposed to be subject to change have provided consent statements except Station KMXB(FM), Henderson, Nevada and KKBK(FM), Baker, California. Thus, this proposal complies with the Commission's *Columbus, Nebraska* policy. See also *Castle Rock, Colorado, et al.*, 8 FCC Rcd 4475 (1993); *Farmersville, Texas*, 12 FCC Rcd 4099 (1997), *recon. dismissed*, 12 FCC Rcd 12056 (1997).

4. Cameron also hereby states that, should the Commission amend the table of allotments as requested herein, Cameron intends to file an application for the new allotment and, if that application is granted, to construct the facility expeditiously, and with respect to the proposed changes of existing allotments, Cameron intends to file (or, with respect to stations of

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<sup>1</sup> Reimbursement will be made directly by Cameron or through its consultant, Spectrum Scan-Searchlight, LLC, which has assisted Cameron in the development of this Counterproposal. As the ultimate beneficiary of the channel changes proposed herein, Cameron will be responsible for all reimbursements.

which it is not the licensee, take appropriate steps to cause to be filed) appropriate applications to implement the changes.

**Conflict with the *NPRM*.**

5. The *NPRM* proposes the allotment of Channel 237A to Amboy, California as its first local service. The instant Counterproposal is in conflict with the Amboy proposal due to the proposed allotment of Channel 237A to Desert Center, California. See the Accompanying Engineering Statement, Figure 1. However, no comparison of the relative need for the channel as between those communities is necessary, since Cameron is also proposing the allotment of Channel 231A at Amboy. As a result, Amboy would still obtain its first local service, while Desert Center would receive its first competitive local FM service.

**Compliance with the Commission's Technical Rules**

***Desert Center, California***

6. Channel 237A can be allotted to Desert Center consistently with the Commission's spacing requirements, except for the currently-proposed allotment of Channel 237A to Amboy. See Engineering Statement, Figure 1. The allotment to Desert Center would provide that community with its first local competitive FM station, a factor which is considered as part of the allotment criteria set forth in *Revision of FM Assignment Policies and Procedures ("FM Assignment Policies")*, 90 FCC2d 88 (1982).<sup>2</sup> As indicated above, should the Commission allot Channel 237A to Desert Center, Cameron intends to file an application for use of that channel and, if that application is granted, Cameron intends to construct and operate a station on that channel.

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<sup>2</sup> The fact that the Commission has already allotted one channel to Desert Center establishes that that community warrants its own radio service.

***Amboy, California***

7. In order to accommodate the proposed allotment of Channel 237A to Desert Center, Channel 231A is hereby proposed to be substituted for Channel 237A, which is proposed in the *NPRM*. As set forth in Figure 3 of the Engineering Statement, that channel substitution may be effected consistently with the Commission's spacing requirements with one exception. That exception involves Station KMBX(FM), Channel 231C, Henderson, Nevada, to which the proposed Channel 231A allotment at Amboy would be short-spaced.

***Station KMBX(FM), Henderson, Nevada***

8. The short-spacing between Channel 231A at Amboy and KMBX(FM), Henderson, can be corrected by substituting Channel 230C at Henderson using the presently licensed coordinates of KMBX(FM), as demonstrated in Figure 4 of the Engineering Statement. As shown therein, the only problems with that substitution are presented by the currently pending proposal to allot Channel 229A at Mohave Valley, California, and the outstanding construction permit to operate on Channel 230C3 at Parker, Arizona. Those two impediments may be removed as set forth below.

9. Should the Commission adopt this proposed substitution, as indicated above Cameron will reimburse the KMBX(FM) licensee for the reasonable costs involved in changing its channel in accordance with *Circleville, Ohio*. In addition, Cameron requests that the Commission issue an Order to Show Cause to Station KMBX(FM) in order to enable this proposed channel substitution to be effectuated.

***Parker, Arizona***

10. The conflict between the substitution of Channel 230C at Henderson and the outstanding Parker construction permit can be remedied by substituting Channel 252B1 for

Channel 230C3 at Parker. As demonstrated in Figure 5 to the Engineering Statement, that substitution can be accomplished consistently with the Commission's spacing requirements, using special reference coordinates desired by the Parker permittee. As set forth in Attachment A hereto, the Parker permittee has agreed to the proposed substitution.

***Mohave Valley, California***

11. The conflict between the substitution of Channel 230C at Henderson and the pending proposal to allot Channel 229A at Mohave Valley can be remedied by substituting Channel 232A at Mohave Valley. As demonstrated in Figure 11 to the Engineering Statement, that substitution can be accomplished consistently with the Commission's spacing requirements if Channel 234C at Kingman, Arizona, is moved to Pahrump, Nevada, using special reference coordinates.

***Station KFLG(FM), Pahrump, Nevada***

***(a) Technical Studies***

12. Channel 234C can be removed from Kingman, Arizona and relocated to Pahrump, Nevada, as set forth in the Engineering Statement.<sup>3</sup> This can be achieved consistently with the Commission's spacing requirements if the following additional changes are made:

- Channel 276B1 is substituted for Channel 235B1 at Baker, California, and the construction permit currently outstanding for Channel 235B1 at Baker is modified accordingly; and
- Channel 250A is substituted for Channel 236A at Pahrump at the special reference coordinates indicated the Engineering Statement, and the license of Station KNYE(FM), Pahrump, is modified accordingly; and
- Channel 232C1 is substituted for vacant Channel 233C1 at Caliente, California; and

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<sup>3</sup> As set forth in the Engineering Statement, special reference coordinates for the proposed allotment of Channel 234C to Pahrump

- Channel 230C is substituted for Channel 231C at Henderson, and the license of Station KMBX(FM), Henderson, is modified accordingly, as discussed above.

(b) *Change in Community of License*

13. In *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License ("Community of License")*, 4 FCC Rcd 4870 (1989), *recon. granted in part*, 5 FCC Rcd 7094 (1990), the Commission established three criteria to govern proposed changes in a station's community of license:

- First, the proposed channel must be mutually exclusive with its current use;
- Second, the existing community of license must retain local service; and
- Third, the proposed arrangement of allotments should be preferred over the existing arrangement under the Commission's allotment priorities.

14. As demonstrated in the accompanying Engineering Statement, the site proposed for the use of Channel 234C at Pahrump is short-spaced to the licensed site of Station KFLG(FM). Accordingly, the proposed substitution is mutually exclusive with its current use.

15. With respect to retention of local service, Channel 261C2 will remain as a Kingman channel. Station KGMN(FM) is licensed to operate on that channel. In addition, Station KAAA(AM) is licensed to Kingman. The new community of allotment (*i.e.*, Pahrump) is appreciably larger than Kingman: according to the 2000 U.S. Census, Pahrump has a population of more than 24,600, while Kingman's is barely 20,000. Moreover, comparison of the population increase in both communities since the 1990 Census reveals that, during that 10-year period, Kingman's population increased from 12,722 to 20,069, a total of 7,347 persons, while during the same period, Pahrump's population increased by more than twice that many, from 7,424 to 24,631, a total of 17,207 persons. *See* Attachment B. Under these circumstances,

reallotment of the channel to the larger community which is undergoing dramatically greater growth is plainly preferable and consistent with the Commission's allotment priorities. *See, e.g., FM Assignment Policies, supra*, 90 FCC2d at 92.

16. In *Community of License* the Commission expressed concern about the possibility that stations might migrate from underserved rural areas to well-served urban areas. In assessing that risk in particular cases, the Commission stated that it would apply the criteria set out in *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988). In this case, Pahrump is not part of any urbanized area (although Pahrump itself is shown as an "urban cluster" by the U.S. Census Bureau). Thus, it does not appear that a *Tuck* showing is required. However, since the reallotment of the channel to Pahrump would result in the provision of a 70 dBu signal in the Las Vegas urbanized area, the following information is provided.

17. The 2000 population of Pahrump (a census designated place, according to the U.S. Census website) is 24,631, which is 5.1% of the 2000 population of Las Vegas (478,434). While Las Vegas is no doubt larger than Pahrump, the two communities are some 50-60 miles apart and, as discussed below, Pahrump is distinctly independent of Las Vegas. *See, e.g., Headland, Alabama and Chattahoochee, Florida*, 10 FCC Rcd 10352 (1995) (relative populations are less important than evidence of independence).

18. The change in site location for Station KFLG(FM) will result in a net gain in population of more than 1,000,000 persons (151,430 present population v. 1,376,380 proposed population) within the station's 60 dBu contour. *See Engineering Statement*.

19. In assessing the independence of a community for purposes of a *Tuck* showing, the Commission considers a variety of factors, including: (i) the extent to which the community's residents work in the larger metropolitan area, rather than the specified community; (ii) whether

the small community has its own newspaper or other media covering local needs and interests; (iii) whether community leaders and/or residents perceive the community as being separate from the larger metropolitan area; (iv) whether the community has its own local government and elected officials; (v) whether the community has its own telephone book or zip code; (vi) whether the community has its own businesses, health facilities and transportation systems; (vii) whether the community and the larger urbanized area are part of the same advertising market; and (viii) the extent to which the community relies on the larger metropolitan area for municipal services such as police, fire protection, schools and libraries. *Tuck*, 3 FCC Rcd at 5378. <sup>4</sup>

20. In the instant case, there can be no doubt but that Pahrump is plainly independent from Las Vegas.

(i) *Extent to which Pahrump residents work in Pahrump*

21. The most recent U.S. Census labor force data available (for 1990) indicate that 132 (4.5%) of the 2,885 persons 16 years and over who comprised the Pahrump labor force walked to work or worked in their place of residence. *See* Attachment C. According to the Chairman of the Pahrump Town Board, there are currently *over 1,800 businesses* in Pahrump. *See* Attachment D. These include several chain retail outlets, five full-service casinos, and “an endless variety of retail shops and commercial enterprises”, according to Pahrump’s website. *See* Attachment E.

(ii) *Newspapers and other media*

22. Pahrump has two local newspapers, one (*The Pahrump Valley Times*) published twice weekly, the other (*The View*) published weekly. *See* Attachment F. Both provide coverage of local news and events, including local sports, local crime incidents, obituaries and the like.

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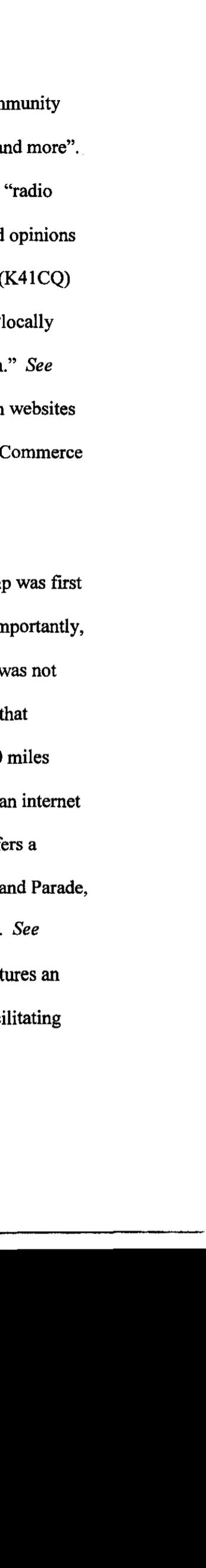
<sup>4</sup> Importantly, it is not necessary that *all* of these factors support the independence of the community. If a majority of the factors establish that independence, the Commission will treat it as an independent community. *E.g., Tuck; Parker and Port St. Joe, Florida*, 11 FCC Rcd 1095 (1996).

According to its website, *The View* “focuses on neighborhood news . . . including community news, personalities, zoning issues, entertainment, business growth, education, sports and more”. In addition, Pahrump has two local FM stations (KXTE and KNYE) and a web-based “radio station on the internet” which refers to itself as KPAH, “webcasting” news, issues and opinions pertaining to Pahrump. See Attachment G. Also, Pahrump has a local LPTV station (K41CQ) which promotes itself as a “source of daily community news and information”, with “locally produced shows [which] provide entertainment and information prevalent to our town.” See Attachment H. Finally, multiple websites concerning Pahrump are accessible through websites established by the community’s government ([www.pahrumpnv.org](http://www.pahrumpnv.org)) and Chamber of Commerce ([www.pahrumpchamber.com](http://www.pahrumpchamber.com)).

(iii) *Pahrump’s perception of independence*

23. As described at the website of the Pahrump town government, Pahrump was first settled in the 1870’s, and formally became a township in 1892. See Attachment E. Importantly, the town notes that Nevada Highway 160 (also referred to as “the Las Vegas Road”) was not paved until 1954, some 75 years *after* Pahrump was first settled. It is therefore clear that Pahrump was established and grew independently of Las Vegas, which is some 50-60 miles distant from Pahrump. More than 65 of the businesses listed in PahrumpPages.com (an internet listing of Pahrump business listings) contain “Pahrump” in their names. Pahrump offers a community center, community swimming pool, an annual Pahrump Harvest Festival and Parade, numerous rodeos, baseball, softball and soccer tournaments and an Indian Pow-Wow. See Attachment D. In addition to the Pahrump Chamber of Commerce, the town also features an Economic Development & Tourism Advisory Board dedicated to “promoting and facilitating

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business growth and encouraging existing business by planning and expanding the economic base of the community.” See Attachment I.

*(iv) Pahrump’s local government*

24. Pahrump is governed by an elected town board, an appointed professional town manager and a staffed town office. Local governmental boards include the Pahrump Arena Advisory Board, the Economic Development & Tourism Advisory Board, the Pahrump Emergency Services Advisory Board, the Pahrump-Nye County Fairgrounds and Recreation Advisory Board, the Pahrump Parks and Recreation Advisory Board, the Pahrump Public Lands Advisory Board and the Pahrump Tourism Advisory Board.

*(v) Pahrump has its own Zip Codes*

25. The U.S. Postal Service has designated 89041 and 89048 as the Zip Codes for Pahrump and its immediately neighboring area. A U.S. Postal Service Post Office is located in Pahrump.

*(vi) Pahrump has numerous commercial establishments and other facilities*

26. As indicated above, according to the Chairman of the Pahrump Town Board, there are over 1,800 businesses operating in Pahrump. Also as indicated above, more than 65 of those specifically identify themselves by using Pahrump in their names. There is also a Pahrump Chamber of Commerce and other organizations which promote the Pahrump business community and economic climate. A “Pahrump Town Hall” website ([www.geocities.com/pahrumptownhall](http://www.geocities.com/pahrumptownhall)) provides listings and links to Pahrump media, casinos, community events and a business directory. According to those resources, Pahrump features multiple health facilities (e.g., Family Health Care Center, Advanced Medical Center, Pahrump Medical Center), at least one dental facility (Pahrump Family Dental), multiple chiropractic

offices (e.g., Affiliated Chiropractic, Inc., Desert Valley Chiropractic and Family Chiropractic), and multiple animal care facilities (e.g., Animal Care Center of Pahrump, Nye County Veterinary Hospital).

27. The Pahrump Valley View lists 13 separate churches located in Pahrump. See Attachment J (<http://www.viewnews.com/pahrump/churches.html>). See also <http://www.rapidyne.com/pahrump/churches.htm>.

28. As indicated above, Pahrump features an annual Pahrump Harvest Festival and Parade, numerous rodeos, baseball, softball and soccer tournaments and an Indian Pow-Wow. The Pahrump Information and Welcome Center website lists approximately 50 civic and social organizations active in Pahrump, including the Elks, Kiwanis, Moose, American Legion, Knights of Columbus, Rotary and VFW. See <http://www.rapidyne.com/pahrump/lodge.htm>

*(vii) Nature of advertising market*

29. Businesses in Pahrump may advertise in either of the two Pahrump newspapers, on either of the two Pahrump radio stations, on the Pahrump LPTV station, or through a number of internet sites which provide links to Pahrump businesses. Plainly, Pahrump advertisers enjoy considerable opportunities to reach local customers through local resources completely separate from and independent of Las Vegas.

*(viii) Pahrump provides its own public services*

30. Pahrump has its own volunteer fire department, and shares police, ambulance, and search and rescue facilities with Nye County. Pahrump has its own library, open all day, Monday through Saturday, and a senior center. It also has an extensive local school system (administered by the Nye County School District, which is located in Pahrump) featuring three elementary schools, a middle school and a high school, all located in Pahrump, with total

enrollment of approximately 3,700 students. *See* Attachment K. Local garbage is disposed of at the Nye County Landfill/Pahrump, and recycling services are available locally.

(c) *Conclusion concerning Pahrump's independence*

31. The foregoing factors clearly demonstrate that Pahrump is an independent community separate and apart from the urbanized area of Las Vegas, both as a matter of economic, geographic and demographic reality and also as a matter of the self-perception of the townspeople of Pahrump.

***Station KKBK(FM), Baker, California***

32. The conflict between the relocation of Channel 234C to Pahrump and the outstanding construction permit of Station KKBK(FM), Baker, California can be resolved by substituting Channel 276B1 for Channel 235B1. As demonstrated in Figure 8 to the Engineering Statement, that substitution can be accomplished consistently with the Commission's spacing requirements, using the license coordinates of Station KKBK(FM), with one exception. That exception involves the allotment of 274C at Boulder City, Nevada, currently utilized by Station KSTJ(FM). That problem can be resolved by downgrading that channel, as discussed below. As stated above, Cameron will reimburse the KKBK(FM) licensee for the reasonable costs involved in changing its channel in accordance with *Circleville, Ohio*. In addition, Cameron requests that the Commission issue an Order to Show Cause to Station KKBK(FM) in order to enable this proposed channel substitution to be effectuated, should such an order be deemed necessary to the implementation of the instant counterproposal.

***Station KSTJ(FM), Boulder City, Nevada***

33. The conflict between the substitution of Channel 276B1 at Baker and the existing allotment of Channel 274C at Boulder City, Nevada can be remedied by downgrading Channel

274C to Channel 274C0 at Boulder City. As demonstrated in Figure 9 to the Engineering Statement, that downgrading would be consistent with the Commission's spacing requirements. The licensee of Station KSTJ(FM) has authorized Cameron to represent to the Commission that it has granted its consent to the downgrading of Channel 274C to 274C0, subject to certain conditions which Cameron anticipates will be satisfied (e.g., that the Counterproposal is granted by the FCC).

***Station KNYE(FM), Pahrump, Nevada***

34. The conflict between the proposed relocation of Channel 234C to Pahrump and the existing allotment of Channel 236A, currently utilized by Station KNYE(FM), Pahrump, can be remedied by substitution of Channel 250A for Channel 236A. See Engineering Statement, Figure 10. As indicated in Attachment L, the licensee of Station KNYE(FM) has consented to the proposed substitution. While the substitution of Channel 250A for 236A at Pahrump will result in a short-spacing to Station KLUK(FM), Needles, California, the licensee of Station KLUK(FM) is Cameron, the counter-proponent herein. As demonstrated in Figure 13 to the Engineering Statement, Cameron will be able to relocate the transmitter of Station KLUK(FM) so as to accommodate the substitution proposed herein without requiring any relocation of Station KNYE(FM). In the event that this Counterproposal is approved by the Commission, Cameron hereby commits that it will file an application proposing the relocation of the transmitter of Station KLUK(FM), Needles, to accommodate the substitution of Channel 250A at Pahrump using the transmitter site presently authorized for the operation of Station KNYE(FM) and, if that application is granted, Cameron will implement the changes so authorized..

*Caliente, Nevada*

35. The conflict between the relocation of Channel 234C to Pahrump and the vacant allotment of Channel 233C1 at Caliente, Nevada can be remedied by substituting Channel 232C1 at Caliente. As demonstrated in Figure 7 to the Engineering Statement, that substitution can be accomplished consistently with the Commission's spacing requirements if Channel 230C is substituted for Channel 231C in Henderson (and used by KMXB(FM)), as specified above.

*Station KZKE(FM), Seligman, Arizona*

36. Cameron also proposed that Channel 234C2 be substituted at Seligman, Arizona for Channel 277A, using a special reference point for Station KZKE(FM) at Seligman, as set forth in Figure 12 to the Engineering Statement. Also as indicated in the Engineering Statement, the upgraded channel at Seligman will more than triple the persons within the 60 dBu contour, from 1,142 to 3,812. As indicated in Attachment M, the licensee of Station KZKE(FM) has consented to the proposed substitution.

**Conclusion**

37. The proposal described above affords multiple advantages: it will result in new local service, new local competitive service, and increased audience and areas to be served.

Accordingly, Cameron urges the Commission to grant this Counterproposal.

Respectfully submitted,

  
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