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OFFICE OF THE SECRETARY

June 29, 2002

Sierra Grande Broadcasting
PO Box 51
Des Moines, New Mexico 88418-0051

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Reference: MM Docket 02-14

MM Docket 02-12

As proposed:

Beaver, Utah 221A

Salina, Utah 276C

Counter proposed by Spectrum Scan, LLC

Beaver, Utah 246A or 261A MM 02-12

Counter proposed by Millcreek Broadcasting, LLC, and others:

Salina, Utah 300C MM 02-14

Counter proposed by Sierra Grande Broadcasting:

Beaver, Utah 261A, 300C

Salina, Utah 276C or 277C0

Spectrum Scan, LLC has already provided the engineering and comments for Beaver, Utah 261A in their counterproposal. I have provided comments and engineering for Beaver, Utah 300C and Salina, Utah 277C0. I request that the proposal for Beaver, Utah 246A not be considered since channel 246 is an image channel to my proposed channel 300.

Millcreek and others have counter proposed that I take Salina, Utah 300C or forget it.

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Their suggested site has me in very low land surrounded by three sets of mountain ranges. If I was to build what maybe the world's tallest tower, I might be able to get enough HAAT for a Class C FM station. Exhibit E, Figure 20 of the Millcreek counter proposal is not taking into account the terrain.

I consider that I cannot use Signal Peak for the transmitter site just in case Cumulus Licensing Corporation decides to add about six meters to KBKL, Grand Junction, Colorado 300C to upgrade from a Class CØ facility to a Class C facility. Millcreek's KUDD, Roy, Utah, 300C will prevent me from using a site north of the spur to the west of Signal Peak. A spur that goes northwest from Signal Peak will block the signal the signal from a transmitter site on the west spur from getting to Salina. The FCC recently returned my petition for rule making for Garfield, Colorado because of terrain between the proposed transmitter site and Garfield.

I go to the westside mountain range, and again White Pine Peak is too close to Millcreek's KUDD. I move south of White Pine Peak to where the peak does not block the signal from Salina, and I have a major spur between any possible transmitter site and Salina. I can keep moving southwest, and that major spur will still be in the way.

I go to the southwest mountain range, where I can see down the Seiver River Valley to Salina, and I have an area about nine kilometers wide to look for a suitable transmitter site. My maps say that because of the terrain, I will have long range to the northeast (toward Salina) and south, but in other directions my signal will be blocked by the taller mountains. If I build a six-hundred meter plus tower where Millcreek wants me to build my tower, and I could still have a negative HAAT.

Since Millcreek has insisted that I take 300C, I have decided to put it where I can use it as

a Class C FM station without the need to build a tall tower. Mount Belknap is a site that has the required minimum separation from KBKL, KUDD, and the proposed Caliente, Nevada 299C2 allotment. According to the City of Beaver, <http://www.beaverutah.net>, web page, Beaver is a community of 2,454 residents. The Beaver County School District has their district offices in Beaver. Belknap Elementary and Beaver High School are in Beaver. The city owns and operates their own hydroelectric plant. They also have their own water and sewer, park and recreation, public works, and cemetery departments. They list three Churches of Jesus Christ of Latter Day Saints, First Baptist Church, and Jehovah Witnesses, Beaver Valley Hospital.

According to the demographics at <http://salinaut.areaguides.net/census.html>, Salina, Utah has a population of 2,393 people. At one time it was published in the Broadcasting Yearbook that a construction permit had been issued to construct a local channel (Class C) AM broadcasting station. The station was never built as far as I know. I think that the station would have been on 1450 kHz.

North of the Interstate Highway 70 interchange on US Highway 50 there are a number of motels, gas stations and restaurants. As I continue north, there is an arena on the west side of US Highway 50. I think the arena is called Blackhawk Arena. There might be homes before I get to the downtown business district. When US Highway 50 turns west, at the US Highway 89 junction, I am still in the downtown business district. There might be homes there, but I do not remember any homes until I am west of the US Highway 50 and Utah Highway 24 junction, on US Highway 50. These houses only last for a short distance until I am out in the country. It has been two years since I made my last trip to California.

I am proposing Salina, Utah 277C0 as an alternate to my Salina, Utah 276C. Millcreek in

its letter of June 11, 2002 wants me off of 276C. These letters did not tell me where to put the transmitter site without building a very tall tower for the Salina, Utah 300C. In looking at my maps I do see a suitable site in either the two mountain ranges to the east nor west of their proposed, low land site that would allow an unblocked signal to get to Salina.

While channel 277 is not as clear as channel 276 was for the Salina area, it is clear enough to a site restricted allotment. Mount Terrill is 221.4 km from KRSP-FM, 278C, Salt Lake City, Utah, and the required separation is 220 km for a Class C0 to Class C allotment. The terrain is a gentle slope from Mount Terrill to Salina. While the ERP will be lower, it has been my experience that HAAT is more important than ERP. K291AD is my example of where HAAT is more important than ERP. K291AD is on top of Sierra Grande, and I have been able to receive that station to almost Elkhart, Kansas. Des Moines is on the north slope of Sierra Grande.

Salina will not be in the 70 dB μ contour of the Beaver allotment, and Beaver will not be within the 70 dB μ contour of the Salina allotment. Therefore 73 CFR 3555(a)(1) does not apply. Baker, Nevada is some distance from Beaver, Utah. My plan is to put my Baker station west of Baker, on Wheeler Peak.

If allotted, I will apply for the Salina, Utah 276C or 277C0, and the Beaver, Utah 300C construction permits. To the best of my knowledge the information contained in this document is correct.



Willison H. Gormly

**Sierra Grande Broadcasting
Beaver, Utah
300C FM Allocation**

City of License	State	Call Sign	Channel	Class	Latitude			Middle latitude			Longitude			
					Degrees	Minutes	Seconds	Decimal	Degrees	Radians	Degrees	Minutes	Seconds	Decimal
Beaver	Utah	Proposed station	300	C	38	19	22	38.323	38.3228	0.6689	112	25	31	112.43
Beaver	Utah	City			38	16	37	38.277	38.2999	0.6685	112	38	25	112.64
Salina	Utah	City coordinate			38	57	30	38.958	38.6406	0.6744	111	51	18	111.86
Co-channel														
Escalante	Utah	K300AG	300	D	37	47	15	37.788	38.0551	0.6642	111	35	45	111.6
Magna	Utah	KUDD-FM4	300	D	40	39	34	40.659	39.4911	0.6892	112	12	6	112.2
Parowan	Utah	MM 99-224	300	C2	37	50	30	37.842	38.0822	0.6647	112	49	30	112.83
Parowan	Utah	MM 02-14	300	C2	37	50	30	37.842	38.0822	0.6647	112	49	30	112.83
Provo	Utah	KUDD-FM3	300	D	40	39	34	40.659	39.4911	0.6892	112	12	6	112.2
Roy	Utah	KUDD	300	C	40	48	29	40.808	39.5654	0.6905	111	53	22	111.89
Salina	Utah	MM 02-14	300	C	38	34	2	38.567	38.445	0.671	112	16	42	112.28
Salina	Utah	MM 02-14	300	C	38	34	2	38.567	38.445	0.671	112	16	42	112.28
Salt Lake City	Utah	KUDD-FM1	300	C	40	48	29	40.808	39.5654	0.6905	111	53	22	111.89
Washington	Utah	K300AC	300	D	37	9	15	37.154	37.7385	0.6587	113	53	0	113.88
First Adjacent Channel														
Caliente	Nevada	MM 01-135	299	C2	37	39	18	37.655	37.9889	0.663	114	30	34	114.51
Second Adjacent Channel														
Third Adjacent Channel														
Image Channels														
Beaver	Utah	MM 02-12	246	A	38	16	37	38.277	38.2999	0.6685	112	38	25	112.64
Beaver	Utah	MM 02-12	246	A	38	16	37	38.277	38.2999	0.6685	112	38	25	112.64

**Sierra Grande Broadcasting
Beaver, Utah
300C FM Allocation**

Call Sign	Kilometers per degree latitude	Kilometers per degree longitude	North South distance km	East West distance km	Distance km	Required seperation km	Direction degrees	Remarks
Proposed station	111.00027	87.4483	0	0	0			Mount Belknap
City	110.99984	87.47582	5.08749	18.8073	19.5		257.97	
City coordinate	111.00638	87.0652	70.55072	49.65135	86.3		41.9	
K300AG	110.99515	87.76886	59.41324	72.79939	94	226	122.84	
KUDD-FM4	111.0228	86.02661	259.42328	19.23651	260.1	226	5.47	
MM 99-224	110.99566	87.7365	53.40125	35.07023	63.9	249	219.72	
MM 02-14	110.99566	87.7365	53.40125	35.07023	63.9	249	219.72	Move to 272C2
KUDD-FM3	111.0228	86.02661	259.42328	19.23651	260.1	226	5.47	
KUDD	111.02424	85.93497	275.92608	46.04682	279.7	226	12.17	Auxiliary transmitter
MM 02-14	111.00262	87.30127	27.13397	12.82844	30	290	31.01	Move from 276C
MM 02-14	111.00262	87.30127	27.13397	12.82844	30	290	31.01	Move to 277C0
KUDD-FM1	111.02424	85.93497	275.92608	46.04682	279.7	226	12.17	
K300AC	110.98909	88.14566	129.70308	128.52127	182.6	226	231.29	
MM 01-135	110.99388	87.84791	74.11925	183.08969	197.5	188	252.23	
MM 02-12	110.99984	87.47582	5.08749	18.8073	19.5	29	257.97	Move to 246A or 261A
MM 02-12	110.99984	87.47582	5.08749	18.8073	19.5	29	257.97	Move to 261A

**Sierra Grande Braodcasting
Salina, Utah
277C0 FM Allocation**

City of License	State	Call Sign	Channel	Class	Latitude				Middle latitude		Longitude			
					Degrees	Minutes	Seconds	Decimal	Degrees	Radians	Degrees	Minutes	Seconds	Decimal
Salina	Utah	Proposed station	277	C0	38	42	44	38.7122	38.7122	0.67566	111	38	46	111.646
Salina	Utah	City coordinate			38	57	30	38.9583	38.8353	0.6778	111	51	18	111.855
Beaver	Utah	City			38	16	37	38.2769	38.4946	0.67186	112	38	25	112.64
Co-channel														
Castle Valley	Utah	K277AF	277	D	38	31	45	38.5292	38.6207	0.67406	109	19	21	109.323
First adjacent channels														
Bryce Canyon	Utah	K276DK	276	D	37	45	21	37.7558	38.234	0.66731	111	52	27	111.874
Cedar City	Utah	K276DA	276	D	38	6	16	38.1044	38.4083	0.67035	112	59	47	112.996
Coalville	Utah	MM 02-14	276	C	40	55	46	40.9294	39.8208	0.695	111	0	26	111.007
Manti, Utah		K276AS	276	D	39	14	44	39.2456	38.9789	0.68031	111	35	48	111.597
Millcreek	Utah	K276DP	276	D	40	48	29	40.8081	39.7601	0.69395	111	53	22	111.889
Panguitch	Utah	K276CU	276	D	37	49	19	37.8219	38.2671	0.66789	112	27	28	112.458
Park City	Utah	K276CE	276	D	40	40	59	40.6831	39.6976	0.69285	111	31	22	111.523
Richfield	Utah	K276AT	276	D	38	38	4	38.6344	38.6733	0.67498	112	3	33	112.059
St. George	Utah	K276DJ	276	D	37	3	49	37.0636	37.8879	0.66127	113	34	20	113.572
Montecello	Utah	KAJJ-LP	278	L1	37	52	41	37.8781	38.2951	0.66838	109	20	38	109.344
Salt Lake City	Utah	KRSP-FM	278	C	40	39	34	40.6594	39.6858	0.69265	112	12	5	112.201
Salt Lake City	Utah	KRSP-FM	278	C	40	39	35	40.6597	39.686	0.69265	112	12	5	112.201
Second adjacent channels														
Hurricane	Utah	MM 99-126	275	C3	37	10	30	40.6594	39.6858	0.69265	113	17	24	113.29
Juab County	Utah	K275AG	275	D	39	43	58	39.7328	39.2225	0.68456	111	56	34	111.943
Third adjacent channels														
Junction	Utah	K274AH	274	D	38	12	49	38.2136	38.4629	0.6713	112	14	23	112.24
Midvale	Utah	KQMB	274	C	40	39	34	40.6594	39.6858	0.69265	112	12	5	112.201
Hanksville	Utah	K280EA	280	D	38	22	28	38.3744	38.5433	0.67271	110	41	51	110.698
Kingston	Utah	K280AB	280	D	38	12	49	38.2136	38.4629	0.6713	112	14	23	112.24
Nephi	Utah	KMDG	280	C	39	45	37	39.7603	39.2363	0.6848	111	34	38	111.577

Image channels

Sierra Grande Braodcasting

Salina, Utah

277C0 FM Allocation

Call Sign	Kilometers per degree latitude	Kilometers per degree longitude	North South distance km	East West distance km	Distance Required km	Required seperation km	Direction degrees	Remarks
Proposed station	111.00776	86.97843	0	0	0			
City coordinate	111.01013	86.82912	27.32083	18.13764	32.8	Distance to Salina	319.68	
City	111.00357	87.24151	48.31739	86.7326	99.3		246.35	
K277AF	111.006	87.08922	20.32026	202.36148	203.4	215	94.5	
K276DK	110.99857	87.55481	106.1578	19.96736	108	152	193.41	
K276DA	111.00192	87.34542	67.4645	117.94058	135.9	152	245.77	
MM 02-14	111.02919	85.61886	246.17639	54.70094	252.2	220	16.07	
K276AS	111.0129	86.65436	59.20688	4.28458	59.4	152	5.3	
K276DP	111.02801	85.69413	232.6962	20.85224	233.6	152	353.38	
K276CU	110.99921	87.51516	98.82013	71.03314	121.7	152	222.36	
K276CE	111.0268	85.77154	218.81532	10.57849	219.1	152	3.58	
K276AT	111.00701	87.02553	8.63388	35.94638	37	152	259.34	
K276DJ	110.99195	87.96817	182.98256	169.43647	249.4	152	229.44	
KAJJ-LP	110.99974	87.48149	92.59228	201.40183	221.7		109.92	
KRSP-FM	111.02657	85.78615	216.1934	47.63514	221.4	220	344.08	
KRSP-FM	111.02657	85.78598	216.22425	47.63505	221.4	220	344.09	
MM 99-126	111.02657	85.78615	216.1934	141.0229	258.1	87	319.83	
K275AG	111.0176	86.35667	113.29963	25.61915	116.2	86	343.79	
K274AH	111.00297	87.27968	55.34731	51.81019	75.8	86	229.97	
KQMB	111.02657	85.78615	216.1934	47.63514	221.4	105	344.08	
K280EA	111.00451	87.18269	37.49486	82.70247	90.8	86	109.6	
K280AB	111.00297	87.27968	55.34731	51.81019	75.8	86	229.97	
KMDG	111.01787	86.33982	116.3529	5.94785	116.5	105	3.76	