

EXHIBIT J

EXHIBIT K

TECHNICAL ANALYSIS

The attached maps were prepared by Arthur M. Hoover of Technical Services Group, 12015 Cloverland Court, Baton Rouge, Louisiana 70809.

Figure 1 shows the area in which a fully-spaced Channel 281C0 facility could be located. The area to the east is constrained by an arc from the proposed reference point of the proposed Westwego Channel 279C0 allocation. There is significant area to the east of the Westwego reference point in which a transmitter could be located and still provide a 70 dBu signal to the entire New Orleans Urbanized Area. If the transmitter for a relocated WUSW-FM were moved to the east, it would open additional area in which the Gonzales Channel C0 transmitter could be located. In addition, the area to the west of the specified point is constrained by a spacing arc from a Channel 282C2 at Bunkie, Louisiana. There is a pending application to modify the license of station KEZP to operate that station on Channel 282C2 from a location 30.97 kilometers from Bunkie on a bearing of 315.5 degrees. See BPH-20010515AAG. Grant of that application will pull the required spacing contour to the northwest by approximately 20 kilometers and make substantially more area available in which a station on Channel 281C0 could be located, thus permitting a significantly greater amount of coverage of the Baton Rouge Urbanized area.

Figure 2 depicts the predicted 70 dBu coverage from the point in the open zone shown on Figure 1 that is closest to Baton Rouge.

Figure 3 depicts the coverage of the Baton Rouge Urbanized Area that would result from a maximum facilities Class C0 station located at the point shown in Figure 1.

Figure 1

73.207 Analysis

Technical Services, Inc.

Job KSTE-FM2.fmj

Master Database: 2002_NOV_13.fmd

Lat: N29:56:25 Lon: W090:53:55 NAD-83

Scale: 1:1000000

Channel: 281 Class: Ⓞ

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 30 km, Clearance: -0.5km

Comments: CC KSTE Gonzales ATL

Description:

rfInvestigator Version 1.4.1

by rfSoftware, Inc.

Date: 11/17/02 4:36:22 PM

Key:

Short

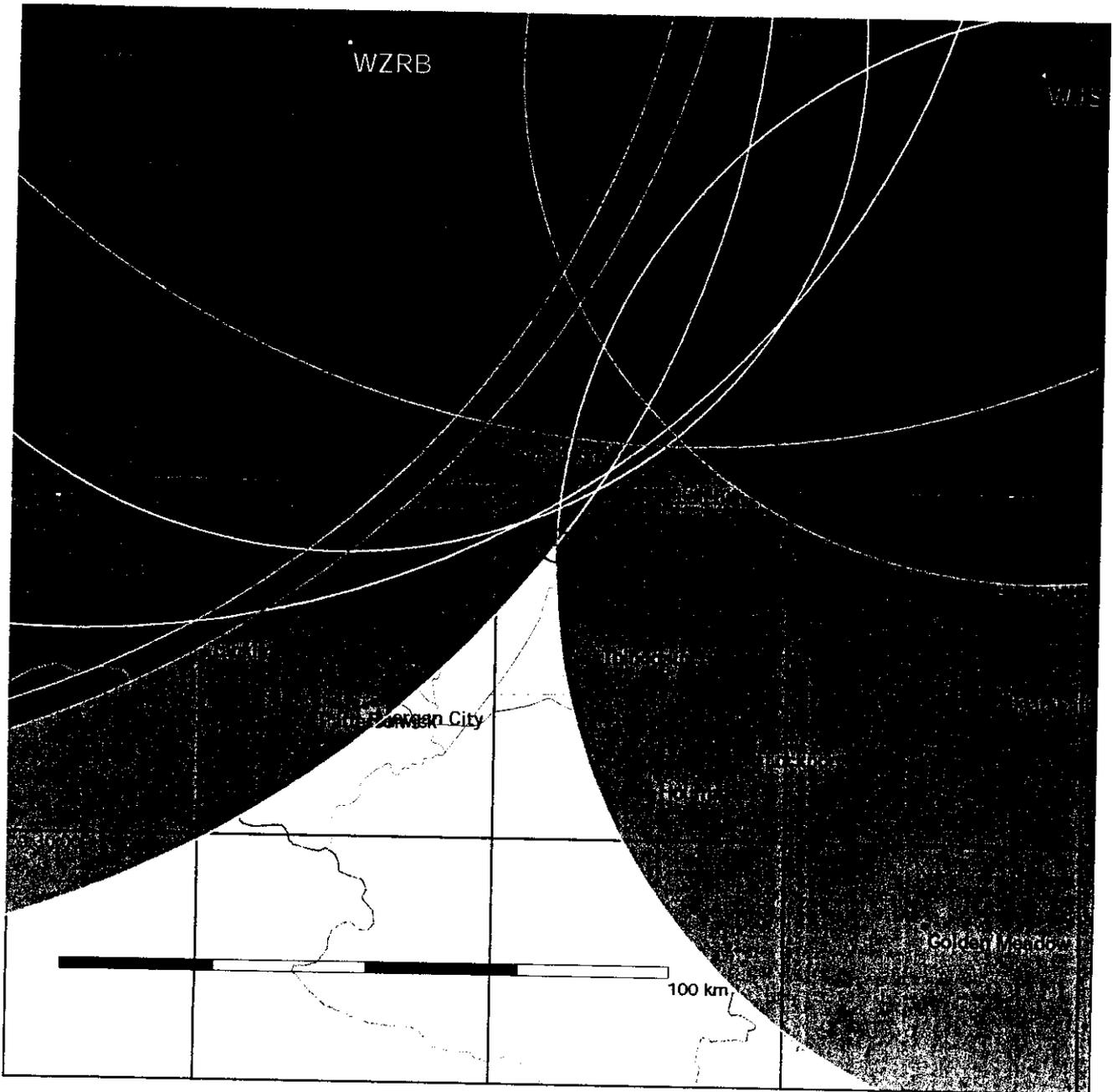


Figure 2

Contour Analysis

Technical Services, Inc.

Job KSTE-FM 2.fmj

Master Database: 2002_NOV_13.fmd

Lat: N29:56:25 Lon: W090:53:55 NAD-83

Scale: 1:1000000

Channel: 281 Class: C

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 30 km, Clearance: -0.5km

Comments: CC KSTE Gonzales ATL

Description: KSTE ATL C Closest 70 dBu

rfInvestigator Version 1.4.1

by rfSoftware, Inc.

Date: 11/17/02 4:40:14 PM

Key

Service
Protected

2nd 3rd Adj

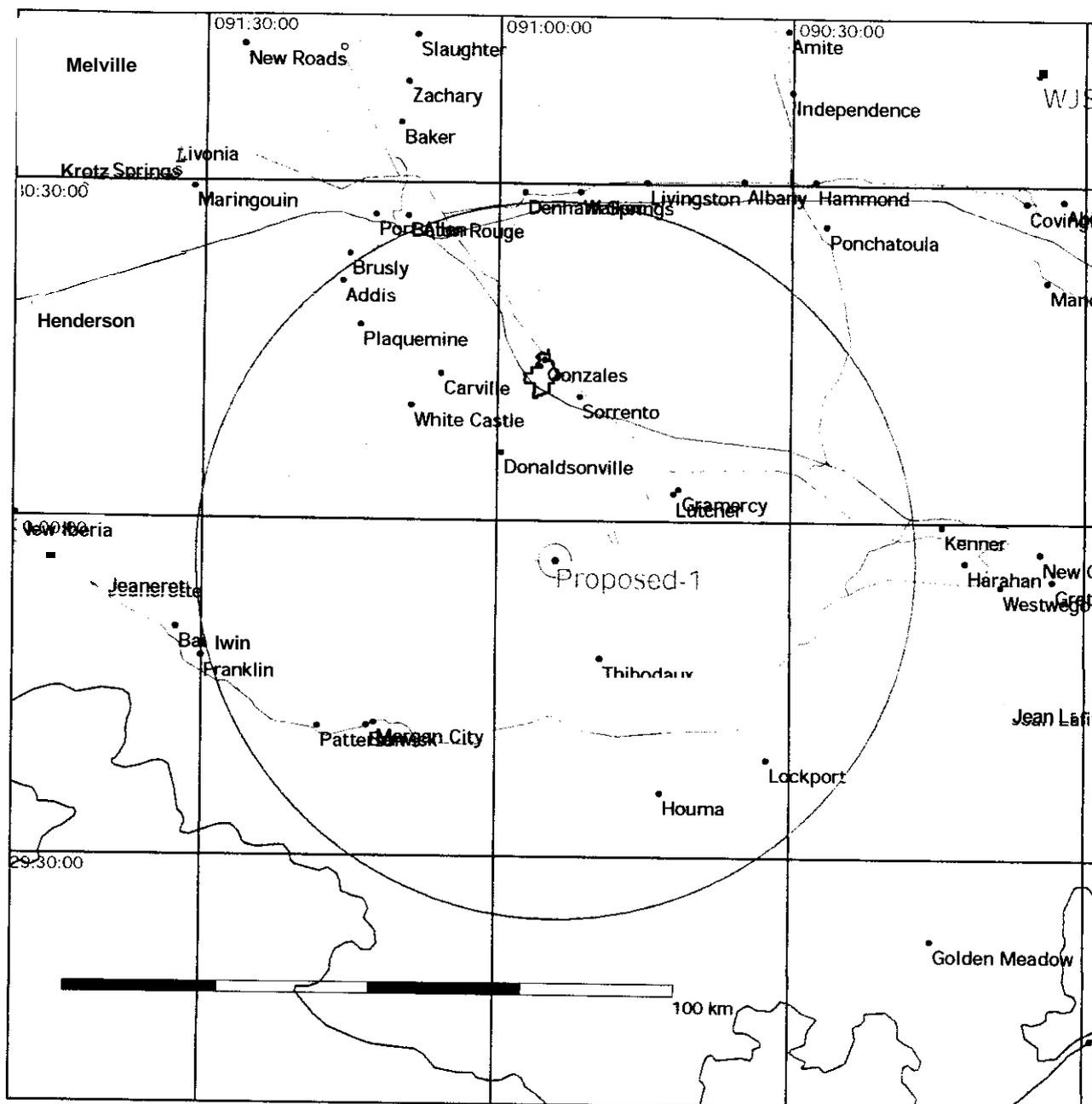


Figure 3

CERTIFICATE OF SERVICE

I, Julia Colish, a secretary with the law ~~firm~~ of Shaw Pittman LLP, hereby certify that copies of the foregoing "OPPOSITION COMMENTS WITH ALTERNATIVE PROPOSAL" were served via U.S. mail on this 18th day of November 2002 on the following:

Mark N. Lipp, Esq.
J. Thomas Nolan, Esq.
Tamara Y. Brown, Esq.
Shook, Hardy & Bacon
600 14th Street, N.W., Suite 800
Washington, DC 20005-2004



Julia Colish

ATTACHMENT II

RECEIPT COPY

Before the
Federal Communications Commission
Washington, D.C.20554

RECEIVED

NOV 18 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Gonzales, Houma and Westwego, Louisiana)
and Hattiesburg, Mississippi))
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Gonzales and Baton Rouge, Louisiana)

MB Docket No. 02-295
RM-10580

MB Docket No. _____
RM- _____

To: Chief, Audio Division
Media Bureau

PETITION FOR CONSOLIDATION

Guaranty Broadcasting Company, LLC and its affiliate, Guaranty Broadcasting Company of Baton Rouge, LLC (collectively, "Guaranty"), by their attorneys, hereby respectfully request that the Commission consolidate the above-captioned proceedings so that the public interest benefits and detriments of each proposal may be considered in the context of both proposals. initiate a rulemaking to make the following changes in its FM table of allotments.

1. In MB Docket No. 02-295, two subsidiaries of Clear Channel Communications seek to amend the FM Table of Allotments (1) to downgrade a Class C FM station allotted to Hatitesburg, Mississippi, to Class CO, and to change its allotted city of license to Westwego, Louisiana, in the heart of the New Orleans Urbanized Area, and (2) to downgrade FM channel 281C, utilized by a Clear Channel station allotted to Houma, Louisiana, to Class CO, and to change its allotted city of license to Gonzales, Louisiana, in the Baton Rouge Urbanized Area.

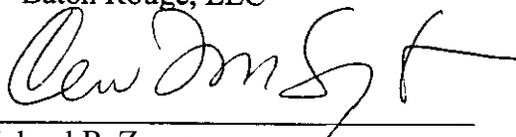
2. In addition to opposing to the Clear Channel proposal, Guaranty suggested in its comments in MB Docket No. 02-295 an alternative arrangement of allotments that offers a number of public interest advantages. It proposed that the Houma Channel 281C allotment be retained in Houma without the change proposed by Clear Channel, and instead that Channel 264C1 (occupied by Guaranty's station WTGE) be shifted from Baton Rouge to Gonzales. It is unclear whether, under Commission precedent, this alternative proposal is "mutually exclusive" and thus may be considered a counterproposal in MB Docket No. 02-295. Because of this, Guaranty is filing a Petition for Rulemaking simultaneously herewith requesting the allotment changes discussed herein.

3. Because of the important public interest questions raised, including avoiding withdrawal of one of only two FM channels from Houma and Terrebonne Parish, as well as the elimination of the substantial net population loss that would result from approval of the move of Channel 281C from Houma to Gonzales, a Public Notice should be issued consolidating MB Docket No. 02-295 with the rulemaking petition filed by Guaranty today, and a decision issued which considers both alternatives.

For all these reasons, Guaranty requests that the Commission consolidate MB Docket No. 02-295 with its pending rulemaking petition and consider the alternative proposals in making an informed decision..

Respectfully submitted,

Guaranty Broadcasting Company, LLC
Guaranty Broadcasting Company *of*
Baton Rouge, LLC

By: 
Richard R. Zaragoza
Clifford M. Hanington

Their Attorneys

SHAW PITTMAN, LLP
2300 N Street, NW
Washington, D.C. 20037
(202)663-8000

Dated: November 18, 2002

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MB Docket No. _____
Table of Allotments,)	RM- _____
FM Broadcast Stations.)	
(Gonzales and Baton Rouge, Louisiana)	

To: Chief, Audio Division
Media Bureau

PETITION FOR RULEMAKING

Guaranty Broadcasting Company of Baton Rouge, LLC (“Guaranty”), by its attorneys, and pursuant to Section 1.420(i) of the Commission’s Rules, hereby respectfully requests that the Commission initiate a rulemaking to make the following changes in its FM table of allotments:

City _____	Channel Existing	Proposed
Baton Rouge, Louisiana	251C, 264C1 268C, 273C,	251C, 268C, 273C
Gonzales, Louisiana	_____ _____	264C1

1. The instant proposal seeks the reallocation of Channel 264C1 from Baton Rouge, Louisiana, to Gonzales, Louisiana. The channel is currently licensed to Guaranty for use by its station WTGE, Baton Rouge. If the proposed reallocation is adopted, Guaranty will take all steps necessary (including the submission of any necessary application) to modify the authorization of WTGE to specify Gonzales as its city of license.

2. In *Amendment of the Commission’s Rules Regarding 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), the Commission stated that in order to grant a change in

community of license: (1) the proposed use of the channel must be mutually exclusive with its current use; (2) the existing community of license must retain local service; and (3) the proposed arrangement of allotments must be preferred over the existing arrangement under the Commission's allotment priorities. The instant proposal meets each leg of that test.

3. First, the proposed use of Channel 264C1 at Gonzales is mutually exclusive with its use at Baton Rouge. Second, Baton Rouge will remain well served if this petition is granted. In addition to the three allocated FM channels, there are four noncommercial FM stations' and seven AM stations' licensed to serve Baton Rouge. Third, the proposal would provide Gonzales with its first local service, a preferred allotment priority.

4. There is no need for a showing under *Huntington Broadcasting Co. v. FCC*, 192 F.2d 33 (D.C. Cir. 1951) or *Faye & Richard Tuck*, 3 FCC Rcd 5374 (1988). While Gonzales is part of the Baton Rouge Urbanized Area, WTGE is already licensed to a city in that Urbanized Area. Therefore there is no issue of Guaranty seeking a preference under Section 307(b) of the Communications Act, and no attempt to remove a channel from a more rural to a more urban area.

5. The proposed reallocation requires no change in the WTGE transmitter site. The station already provides a 70 dBu signal over the entire community of Gonzales. See attached coverage map from current transmitter site of WTGE.

6. Simultaneously herewith Guaranty is submitting a Petition seeking consolidation of this matter with pending Media Bureau Docket No. 02-295, which proposes the reallocation of one of the only two FM stations licensed to Houma, Louisiana, to Gonzales. The instant proposal has a

¹ According to the Commission's CDBS system, these operate on Channels 203C3, 207C1, 212C3 and 216A.

² According to CDBS, the following AM stations are licensed to Baton Rouge: WRBH, WIBR, WJBO, WNDC, WPFC, WXOK and WYNK.

number of superior public interest features to that set forth in MB Docket No. **02-295**, and the public interest requires that these alternative proposals be considered in tandem.

For all these reasons, Guaranty requests that the Commission make the changes to the FM Table of Allotments specified in the instant petition.

Respectfully submitted,

Guaranty Broadcasting Company of
Baton Rouge, LLC

By: 

Richard R. Zaragoza
Clifford M. Harrington

Its Attorneys

SHAW PITTMAN, LLP
2300 N Street, NW
Washington, D.C. 20037
(202)663-8000

Dated: November 18, 2002

Contour Analysis

Technical Services, Inc.

Job WTGE.fmj

Master Database: 2002_NOV_13.fmd

Lat: N30:19:36 Lon: W091:16:36 NAD-83

Scale: 1:1000000

Channel: 264 Class: C

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 30 km, Clearance: -0.5km

Comments: 70 dBu Coverage of Gonzales, LA

Description: WTGE C 70 dBu Gonzales, LA

rfInvestigator Version 1.4.1

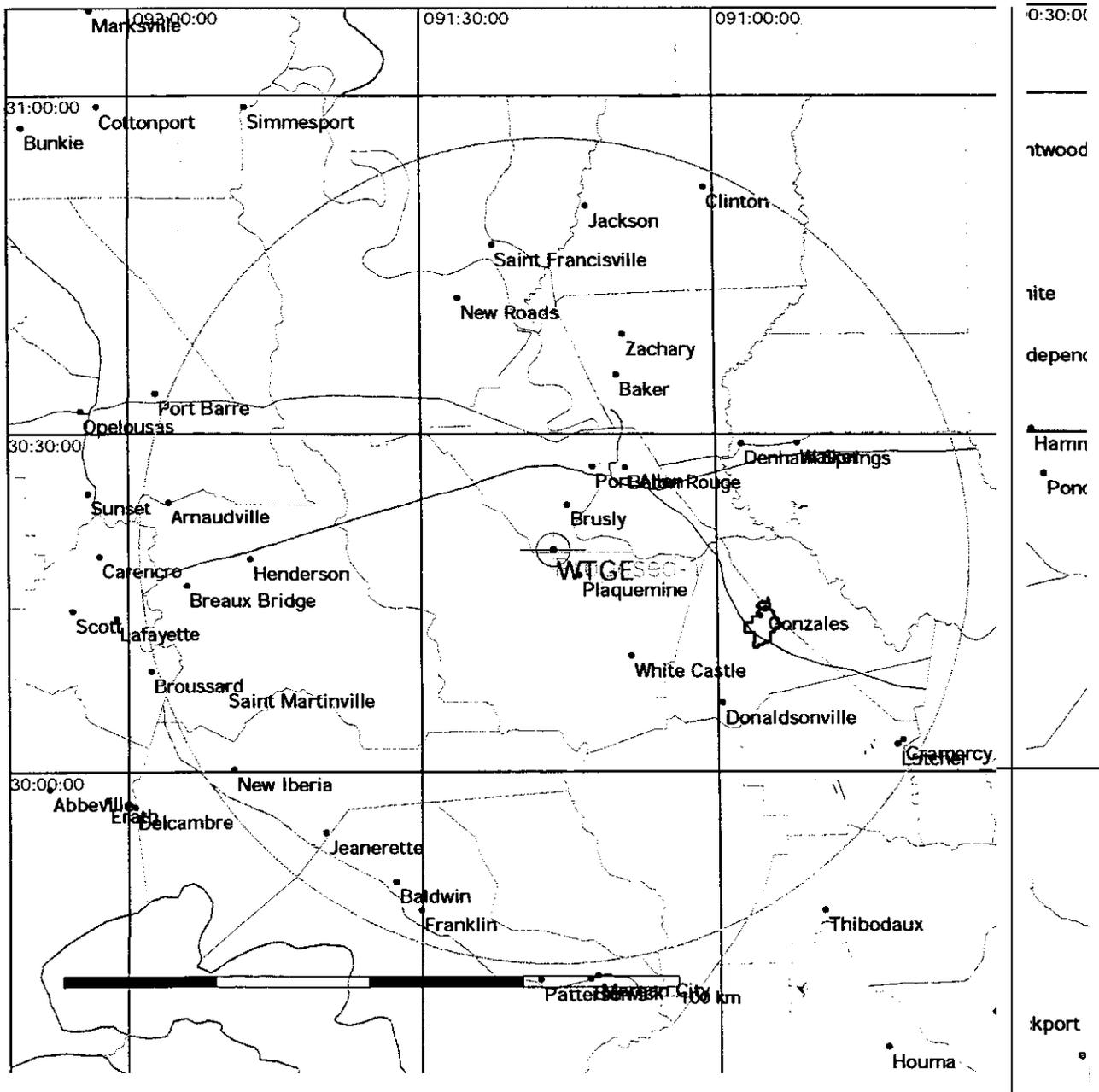
by rfSoftware, Inc.

Date: 11/17/02 2:59:10 PM

Key:

Service
Protected

2nd/3rd Adj



CERTIFICATE OF SERVICE

I, Julia Colish, a secretary with the law ~~firm~~ of Shaw Pittman LLP, hereby certify that copies of the foregoing "Petition for Consolidation" were served via U.S. mail on this 18th day of November 2002 on the following:

Mark N. Lipp, Esq.
J. Thomas Nolan, Esq.
Tamara Y. Brown, Esq.
Shook, Hardy & Bacon
600 14th Street, N.W., Suite 800
Washington, DC 20005-2004



Julia Colish

*Via Hand Delivery

ATTACHMENT III

RECEIPT COPY

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.)
(Gonzales and Baton Rouge, Louisiana)

MB Docket No. _____
RM-

R E C E I V E D

NOV 18 2002

To: Chief, Audio Division
Media Bureau

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PETITION FOR RULEMAKING

Guaranty Broadcasting Company of Baton Rouge, LLC (“Guaranty”), by its attorneys, and pursuant to Section 1.420(i) of the Commission’s Rules, hereby respectfully requests that the Commission initiate a rulemaking to make the following changes in its FM table of allotments:

City	Channel	
	Existing	Proposed
Baton Rouge, Louisiana	251C, 264C1 268C, 273C,	251C, 268C, 273C
Gonzales, Louisiana	-----	264C1

1. The instant proposal seeks the reallocation of Channel 264C1 from Baton Rouge, Louisiana, to Gonzales, Louisiana. The channel is currently licensed to Guaranty for use by its station WTGE, Baton Rouge. If the proposed reallocation is adopted, Guaranty will take all steps necessary (including the submission of any necessary application) to modify the authorization of WTGE to specify Gonzales as its city of license.

2. In *Amendment of the Commission’s Rules Regarding 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), the Commission stated that in order to grant a change in

community of license: (1) the proposed use of the channel must be mutually exclusive with its current use; (2) the existing community of license must retain local service; and (3) the proposed arrangement of allotments must be preferred over the existing arrangement under the Commission's allotment priorities. The instant proposal meets each leg of that test.

3. First, the proposed use of Channel 264C1 at Gonzales is mutually exclusive with its use at Baton Rouge. Second, Baton Rouge will remain well served if this petition is granted. In addition to the three allocated FM channels, there are four noncommercial FM stations' and seven AM stations' licensed to serve Baton Rouge. Third, the proposal would provide Gonzales with its first local service, a preferred allotment priority.

4. There is no need for a showing under *Huntington Broadcasting Co. v. FCC*, 192 F.2d 33 (D.C. Cir. 1951) or *Faye & Richard Tuck*, 3 FCC Rcd 5374 (1988). While Gonzales is part of the Baton Rouge Urbanized Area, WTGE is already licensed to a city in that Urbanized Area. Therefore there is no issue of Guaranty seeking a preference under Section 307(b) of the Communications Act, and no attempt to remove a channel from a more rural to a more urban area.

5. The proposed reallocation requires no change in the WTGE transmitter site. The station already provides a 70 dBu signal over the entire community of Gonzales. See attached coverage map from current transmitter site of WTGE.

6. Simultaneously herewith Guaranty is submitting a Petition seeking consolidation of this matter with pending Media Bureau Docket No. 02-295, which proposes the reallocation of one of the only two FM stations licensed to Houma, Louisiana, to Gonzales. The instant proposal has a

¹ According to the Commission's CDBS system, these operate on Channels 203C3, 207C1, 212C3 and 216A.

² According to CDBS, the following AM stations are licensed to Baton Rouge: WRBH, WIBR, WJBO, WNDC, WPFC, WXOK and WYNK.

Contour Analysis

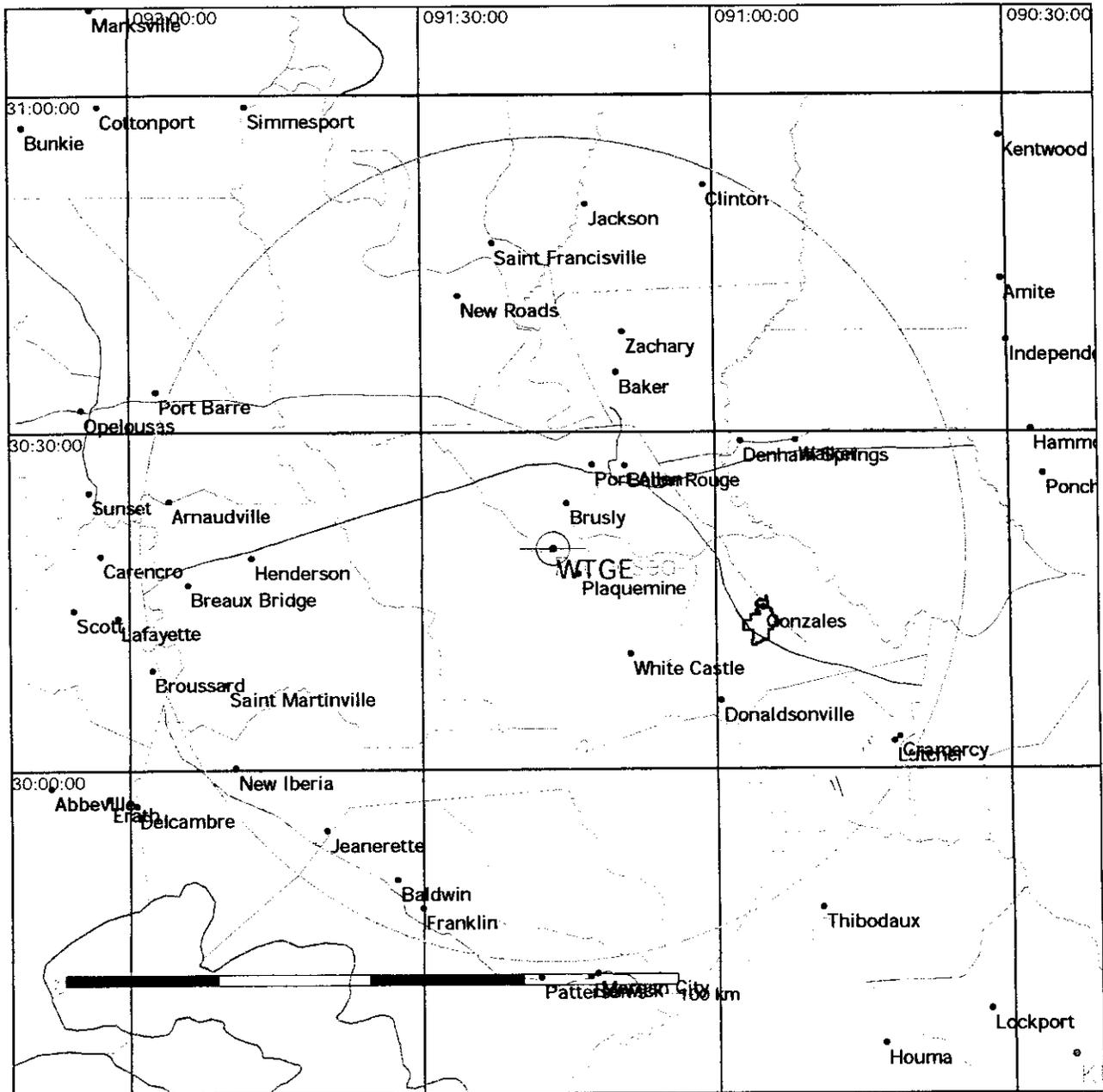
Technical Services, Inc.
 Job WTGE.fmj
 Master Database: 2002_NOV_13.fmd
 Lat: N301936 Lon: W091:16:36 NAD-83
 Scale: 1:1000000
 Channel: 264 Class: C

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved
 Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6
 Range: 30 km, Clearance: -0.5km
 Comments: 70 dBu Coverage of Gonzales, LA
 Description: WTGE C 70 dBu Gonzales, LA

rfInvestigator Version 1.4.1
 by rfSoftware, Inc.
 Date: 11/17/02 2:59:10 PM
 Key:

Protected

2nd/3rd Adj



CERTIFICATE OF SERVICE

I, Renee Williams, a secretary with the law firm of Shaw Pittman LLP, hereby certify that copies of the foregoing "MOTION TO ACCEPT COMMENTS AS TIMELY FILED" were served via hand delivery on this 19th day of November 2002 on the following:

Mark N. Lipp, Esq.
J. Thomas Nolan, Esq.
Tamara Y. Brown, Esq.
Shook, Hardy & Bacon
600 14th Street, N.W., Suite 800
Washington, DC 20005-2004



Renee Williams