

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)
(Florence, South Carolina))

MB Docket No. 03-35
RM-10646

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Assistant Chief, Audio Division
Media Bureau

COUNTERPROPOSAL

Bulldog Broadcasting ("Bulldog"), by its counsel, hereby submits this counterproposal to the *Notice of Proposed Rule Making*, DA 03-369 (rel. Feb. 7, 2003) ("*NPRM*") in the above-captioned proceeding. Bulldog proposes to allot Channel 238C3 to Greeleyville, South Carolina as that community's first local service. In order to accommodate a first local service at Greeleyville, Station WIBZ, Wedgefield, South Carolina must change its channel and Station WIXV, Savannah, Georgia must change its reference coordinates. The following changes to the FM Table of Allotments are requested (listed alphabetically):

<u>Community</u>	<u>Channel</u>	
	<u>Existing</u>	<u>Proposed</u>
Greeleyville, SC	---	238C3
Wedgefield, SC	238A	240A

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I. PRELIMINARY MATTERS

1. Bulldog hereby states that it will reimburse the licensees of Stations WIBZ, Wedgefield, South Carolina and WIXV, Savannah, Georgia for their reasonable expenses in changing channel and transmitter site, respectively, in accordance with *Circleville, Ohio*, 8 FCC 2d 159 (1967). Bulldog also states that it will apply **for** Channel 238C3 at Greeleyville and construct the facility if the Commission grants this proposal.

2. The licensee of WIBZ has not provided a consent statement for the proposed change in channel. Bulldog respectfully requests that the Commission issue an Order to Show Cause to effectuate the channel change. Accordingly, this proposal complies with the Commission's policy in *Columbus, Nebraska*, 59 RR 2d 1185 (1986). With respect to WMV, a change in reference coordinates can be ordered by the Commission in this context. *See, e.g., Cross Plains, Texas, et al.*, 15 FCC Rcd 5506 at ¶ 12 (2000).

II. CONFLICT WITH THE NPRM

3. As indicated in the attached Engineering Statement, this proposal conflicts with the *NPRM* proposal to allot Channel 237A to Florence, South Carolina. *See* Exhibit E, Figure 1. Accordingly, it is properly considered in this proceeding. The Commission compares conflicting proposals under the criteria set forth in *Revision of FM Assignment Policies and Procedures*, 90 F.C.C.2d 88 (1982). In this case, this counterproposal is clearly preferred over the proposal set forth in the *NPRM* since this counterproposal would provide a first local service at Greeleyville (priority 3), while the *NPRM* would add a fourth FM allotment at Florence (priority **4**), which in addition is well served with three AM and four TV stations. *See Soperton, Georgia, et al.*, 16 FCC Rcd 21698 (2001); *Revision of FM Assignment Policies and Procedures, supra*.

III. COMPLIANCE WITH THE COMMISSION'S TECHNICAL RULES

A. New Allotment at Greeleyville, South Carolina

4. As indicated in the attached channel study, Exhibit E, Figure 1, Channel 238C3 can be allotted to Greeleyville at coordinates 33-33-43 North Latitude, 80-02-14 West Longitude in compliance with the Commission's spacing rules provided changes are made at Wedgfield, South Carolina and Savannah, Georgia. The proposed facility will provide a 70 dBu signal to Greeleyville. *See* Exhibit E, Figure 2. The allotment of Channel 238C3 is mutually exclusive with the NPRM proposal to allot Channel 237A to Florence, South Carolina. *See* Exhibit E, Figure 1.

5. The community of Greeleyville, South Carolina, is a community deserving of a first local service. Greeleyville is a rural community located in Williamsburg County along U.S. Highway 521. The Town of Greeleyville is listed in the U.S. Census 2000 with a population of 452. The United State Postal Service zip code designation for Greeleyville is 29056. The town was chartered on December 29, 1893. **See** Exhibit B. Its town government functions independently **of** any other governmental units.

6. Greeleyville businesses include a wide variety of companies several of which have "Greeleyville" in their names, such as the Greeleyville Service Center, Greeleyville Super G, Greeleyville Pharmacy, Greeleyville Package Store, Greeleyville Appliance Center and Bank of Greeleyville. Other businesses located in Greeleyville include Newton Auto World, Supreme Auto Sales, Mount Vernon Grocery and Railcar Restaurant. Greeleyville Medical Center offers medical services to local residents. *See* Exhibit B.

7. Greeleyville is home to several houses of worship such as the Greeleyville Baptist Church, St. John Apostolic Church, Wilson United Methodist Church and Mount Vernon Methodist Church. The Greeleyville Elementary School provides public school education to the children of Greeleyville. Greeleyville holds an annual Memorial Day Weekend Flag Day Festival. See Exhibit B.

B. Station WIBZ, Wedgfield, South Carolina

8. In order to allot Channel 238C3 to Greeleyville, Channel 238A must be deleted at Wedgfield, South Carolina. Channel 240A may be substituted for Channel 238A at the current reference coordinates of WIBZ. See Exhibit E, Figure 3. Bulldog requests that the Commission immediately issue an Order to Show Cause to Miller Communications, Inc., the licensee of WIBZ, to change its channel. Bulldog reiterates that it will reimburse the licensee in accordance with *Circleville, Ohio, supra*.

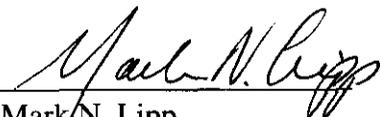
C. Station WIXV, Savannah, Georgia

9. In order to allot Channel 238C3 to Greeleyville, a change in reference coordinates must be made for Channel 238C1 at Savannah, Georgia. Channel 238C1 can be allotted to Savannah at coordinates 32-06-18 North Latitude, 81-29-17 West Longitude consistent with the Commission's spacing rules. See Exhibit E, Figure 4. From the new reference coordinates, the station will place a 70 dBu contour over all of Savannah. See Exhibit E, Figure 5. The licensee of Station WIXV, Cumulus Licensing Corp., has provided a statement consenting to the change in reference coordinates. See Exhibit A. Bulldog reiterates that should the Commission adopt this proposal it will reimburse the licensee for its reasonable expenses in changing reference coordinates.

IV. CONCLUSION

This counterproposal will provide a first local service at Greeleyville, South Carolina. As a result, it should be favored over the proposal set forth in the *NPRM* for a seventh local aural service at Florence, South Carolina. Therefore, Bulldog respectfully requests that the Commission grant its counterproposal.

BULLDOG BROADCASTING

By: 
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J. Thomas Nolan
Shook, Hardy & Bacon
600 14th Street, NW, Suite 800
Washington, DC 20005-2004
(202) 783-8400
Its Counsel

March 31, 2003



ENGINEERING STATEMENT

IN SUPPORT OF A

COUNTERPROPOSAL

MM DOCKET 03-35, DA 03-369

RM-10646

Bulldog Broadcasting

Prepared by:

**Reynolds Technical Associates
12585 Old Highway 280 East, Suite 102
Chelsea, Alabama 35043
(205) 618-2020**

March, 2003

Engineering Statement
In Support of a
Counterproposal
MM Docket 03-35, RM-10646
Bulldog Broadcasting

General

We have been retained by Bulldog Broadcasting (“Bulldog”) to prepare the engineering portion of a counterproposal to MM Docket 03-35 (RM-10646). The original petition for rule making seeks to allot channel 237A to Florence, South Carolina as that community’s fourth FM radio service. Bulldog, in the instant counterproposal, seeks to allot channel 238C3 at Greeleyville, South Carolina in lieu of allocating channel 237A at Florence.

Exhibits Explained

Exhibit E, Figure 1 is an allocation study showing the spacings to other stations if channel 238C3 is allotted to Greeleyville, South Carolina as that community’s first local service. The only short spacings shown are to the following: the license for WIBZ in Wedgefield, South Carolina; WIXV, channel 238C1, Savannah, Georgia; and the proposed allocation of channel 237A at Florence. Hence, this counterproposal is mutually exclusive with the allotment of channel 237A at Florence. The instant counterproposal seeks to change WIBZ from channel 238A to channel 240A. The licensee of WIXV has agreed to a reference site modification, thus eliminating the short spacing to that facility.

Exhibit E, Figure 2 shows the proposed city-grade contour for channel 238C3 from the proposed site. The city-grade contour easily covers 100% of Greeleyville, South Carolina.

Exhibit E, Figure 3 is an allocation study demonstrating that WIBZ can operate on channel 240A at its current site without short spacing any other facilities.

Exhibit E, Figure 4 is a channel spacing study showing that the proposed reference coordinates for WIXV are fully spaced to all other stations, including the modifications proposed in the instant counterproposal. Exhibit E, Figure 5 is a 70 dBu contour map showing that WIXV will continue to cover 100% of its community of license (Savannah, Georgia). Exhibit E, Figure 6 is a gain/loss study map that demonstrates a significant area increase in coverage.

Conclusion

Greeleyville, South Carolina (population 452) will receive its first local service as a result of this counterproposal. The PRM proposes to allocate yet another channel to Florence, a community which currently has several FM stations.

Proposed changes to the Table of Allotments are as follows:

<u>Community</u>	<u>Current</u>	<u>Proposed</u>
Florence, SC	213C3, 219C2, 292A	213C3, 219C2, 292A
Greeleyville, SC	-----	238C3
Wedgfield, SC	238A	240A

Statement of the Consultants

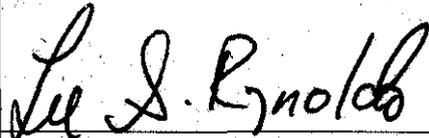
The instant engineering statement was prepared for Bulldog Broadcasting (“Bulldog”) and supports a counterproposal to MM Docket 03-35. It was developed by Reynolds Technical Associates (“RTA”) and may not be used for purposes other than submission to the Commission by RTA.

It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

It is prepared for Bulldog under contractual agreement, and its certification by RTA is used accordingly. If Bulldog fails in its contractual obligation, RTA reserves the right to withdraw its certification.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For RTA:



Lee S. Reynolds

March 28th 2003

12585 Old Highway 280 East, Suite 102
Chelsea, Alabama 35043
(205) 618-2020

**Engineering Statement
In Support of a**

**Counterproposal
MB Docket 03-35**

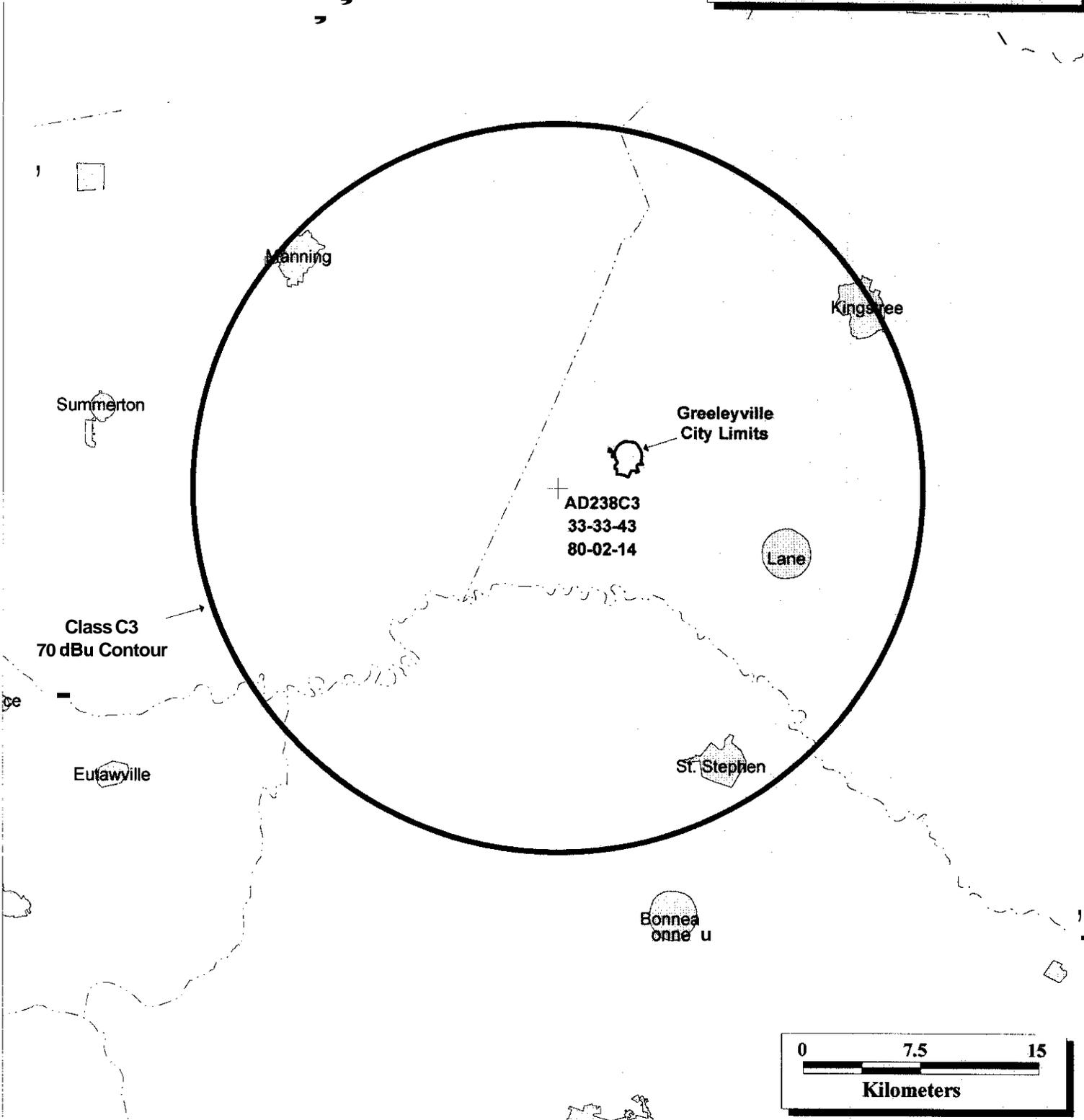
Channel 238C3 at Greeleyville, SC Allocation Study

REFERENCE		DISPLAY DATES
33 33 43 N	CLASS = C3	DATA 03-28-03
80 02 14 W	Current Spacings	SEARCH 03-28-03
----- Channel 238 - 95.5 MHz -----		

Call	Channel	Location		Dist	Azi	FCC	Margin
	Community of Greeleyville		SC	4.95	64.9		
	Reference Coordinates:						
	North Latitude: 33-34-51						
	West Longitude: 79-59-20						
WIBZ	LIC 238A	Wedgefield	SC	54.10	322.7	142.0	-87.90
	Of concern:						
	Instant counterproposal changes WIBZ to channel 240A						
	(See below)						
RADD	ADD 237A	Florence	SC	78.14	24.9	89.0	-10.86
	Of note:						
	MX point with MB Docket 03-35						
WIXV	LIC 238C1	Savannah	GA	206.56	216.4	211.0	-4.44
WIXV.C	CP 238C1	Savannah	GA	206.57	216.4	211.0	-4.43
	Of concern:						
	Reference coordinates modified in instant counterproposal						
WSSXFM	LIC 236C0	Charleston	SC	86.95	167.8	87.0	-0.05
WIXV	ADD 238C1	Savannah	GA	211.09	220.3	211.0	0.09
	Of note:						
	Modified coordinates for WIXV in instant counterproposal						
WKML	LIC 239C0	Lumberton	NC	163.18	33.7	163.0	0.18
WTUA	LIC 291A	St. Stephen	SC	15.72	119.0	12.0	3.72
WAVF	LIC 241C1	Hanahan	SC	84.65	167.2	76.0	8.65
WAVF.C	CP 241C1	Hanahan	SC	84.65	167.2	76.0	8.65
WWBD	LIC 239A	Bamberg	SC	100.67	254.4	89.0	11.67
AD240	ADD 240A	Wedgefield	SC	54.10	322.7	42.0	12.10
	Of note:						
	Spacing requirements for channel 240A at						
	Wedgefield, SC (at current WIBZ site)						
WFMV	LIC 237A	South Congaree	SC	116.25	289.2	89.0	27.25



**AD238C3, Greeleyville, SC
Proposed Class C3
Hypothetical 70 dBu Contour**



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Exhibit E, Figure 2

**Engineering Statement
In Support of a**

**Counterproposal
MB Docket 03-35**

**Channel 240A at Wedgefield, SC (WIBZ) Allocation Study
(Using the Current WIBZ Site as Reference)**

REFERENCE							DISPLAY DATES
33 56 56 N			CLASS = A				DATA 03-28-03
80 23 34 W			Current Spacings				SEARCH 03-28-03
----- Channel 240 - 95.9 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin

WIBZ	LIC 238A	Wedgefield	SC	0.00	0.0	31.0	-31.00
	Of no concern:						
	Licensed coordinates of WIBZ						
WKML	LIC 239C0	Lumberton	NC	154.48	52.8	152.0	2.48
WAVF.C	CP 241C1	Hanahan	SC	135.74	157.5	133.0	2.74
WAVF	LIC 241C1	Hanahan	SC	135.74	157.5	133.0	2.74
WWMG	LIC 241C	Shelby	NC	171.66	336.3	165.0	6.66
AD238	ADD 238C3	Greeleyville	SC	54.10	142.5	42.0	12.10
	Of note:						
	Proposed coordinates of channel 238C3 at Greeleyville						
WXRC	LIC 239C	Hickory	NC	177.94	340.1	165.0	12.94
WWBD	LIC 239A	Bamberg	SC	94.92	222.2	72.0	22.92
WTCB	LIC 294C1	Orangeburg	SC	52.26	249.2	22.0	30.26
RADD	ADD 237A	Florence	SC	71.52	66.8	31.0	40.52
WQZY	LIC 240C1	Dublin	GA	245.93	235.5	200.0	45.93
WFMV	LIC 237A	South Congaree	SC	77.12	266.1	31.0	46.12

**Engineering Statement
In Support of a**

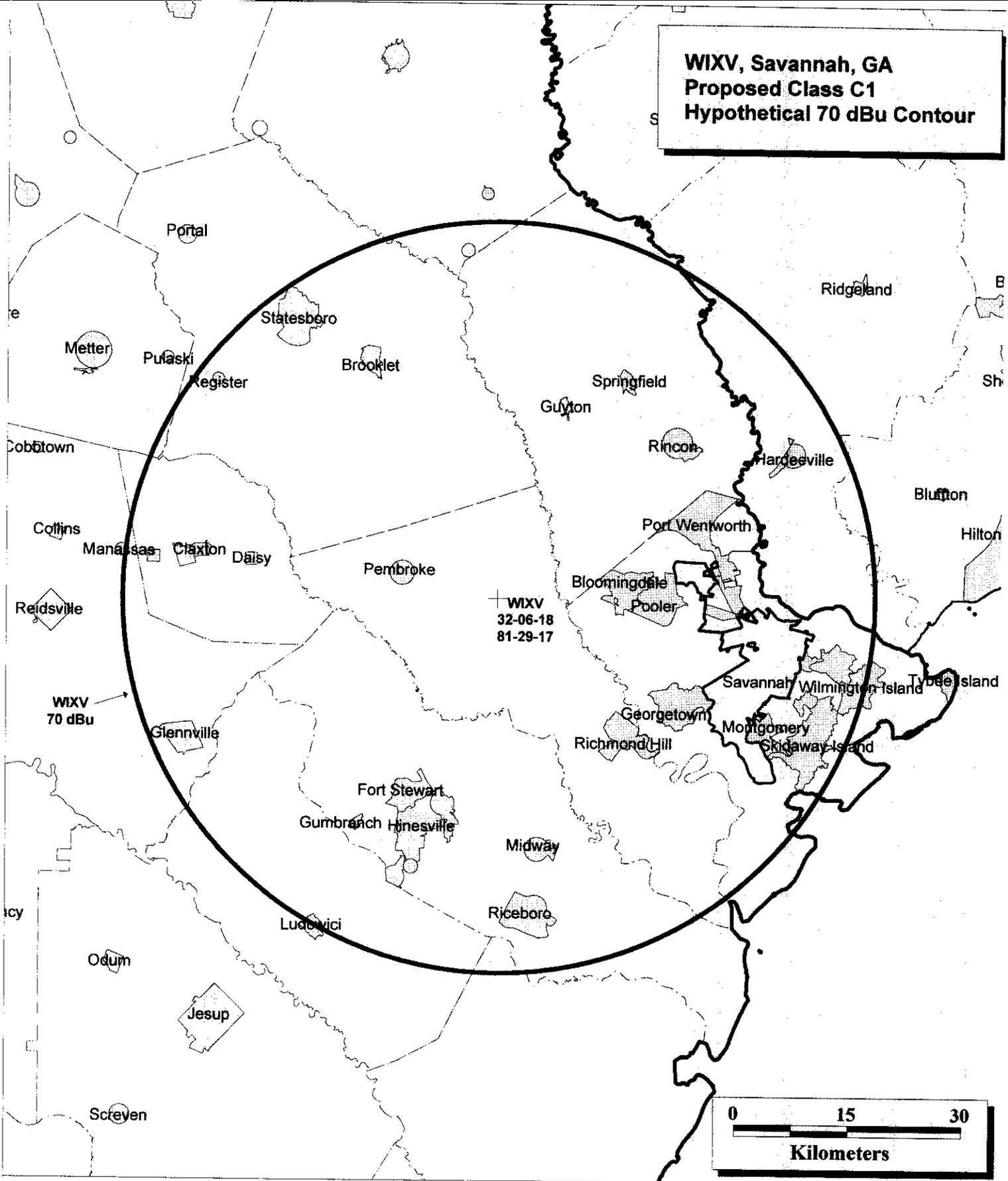
**Counterproposal
MB Docket 03-35**

Channel 238C1 (WIXV) at Savannah, GA Channel Spacing Study

REFERENCE		DISPLAY DATES
32 06 18 N	CLASS = C1	DATA 03-28-03
81 29 17 W	Current Spacings	SEARCH 03-28-03
----- Channel 238 - 95.5 MHz -----		

Call	Channel	Location		Dist	Azi	FCC	Margin
	Community of Savannah		GA	36.74	110.3		
	Reference Coordinates:						
	North Latitude: 32-04-59						
	West Longitude: 81-05-59						
WIXV	LIC 238C1	Savannah	GA	15.00	110.2	245.0	-230.00
WIXV.C	CP 238C1	Savannah	GA	15.04	110.3	245.0	-229.96
	Of no concern:						
	Licensed coordinates of WIXV						
AD238	ADD 238C3	Greeleyville	SC	211.09	39.5	211.0	0.09
	Of note:						
	Proposed allocation coordinates for channel 238C3 at Greeleyville, SC						
WHKN	LIC 235C3	Millen	GA	77.97	333.4	76.0	1.97
WWBD	LIC 239A	Bamberg	SC	139.45	15.8	133.0	6.45
WKIGFM	APP 292A	Glennville	GA	36.61	220.7	22.0	14.61
WKIGFM	LIC 292A	Glennville	GA	41.67	255.0	22.0	19.67
WIBZ	LIC 238A	Wedgefield	SC	228.66	26.2	200.0	28.66
	Of note:						
	Channel 238A substituted for channel 240A in instant counterproposal						
WFXHFM	LIC 291C2	Hilton Head Island	SC	61.86	77.2	27.0	34.86
WQZY	LIC 240C1	Dublin	GA	119.01	302.7	82.0	37.01
WJYF	LIC 237C2	Nashville	GA	206.01	240.2	158.0	48.01

**WIXV, Savannah, GA
Proposed Class C1
Hypothetical 70 dBu Contour**

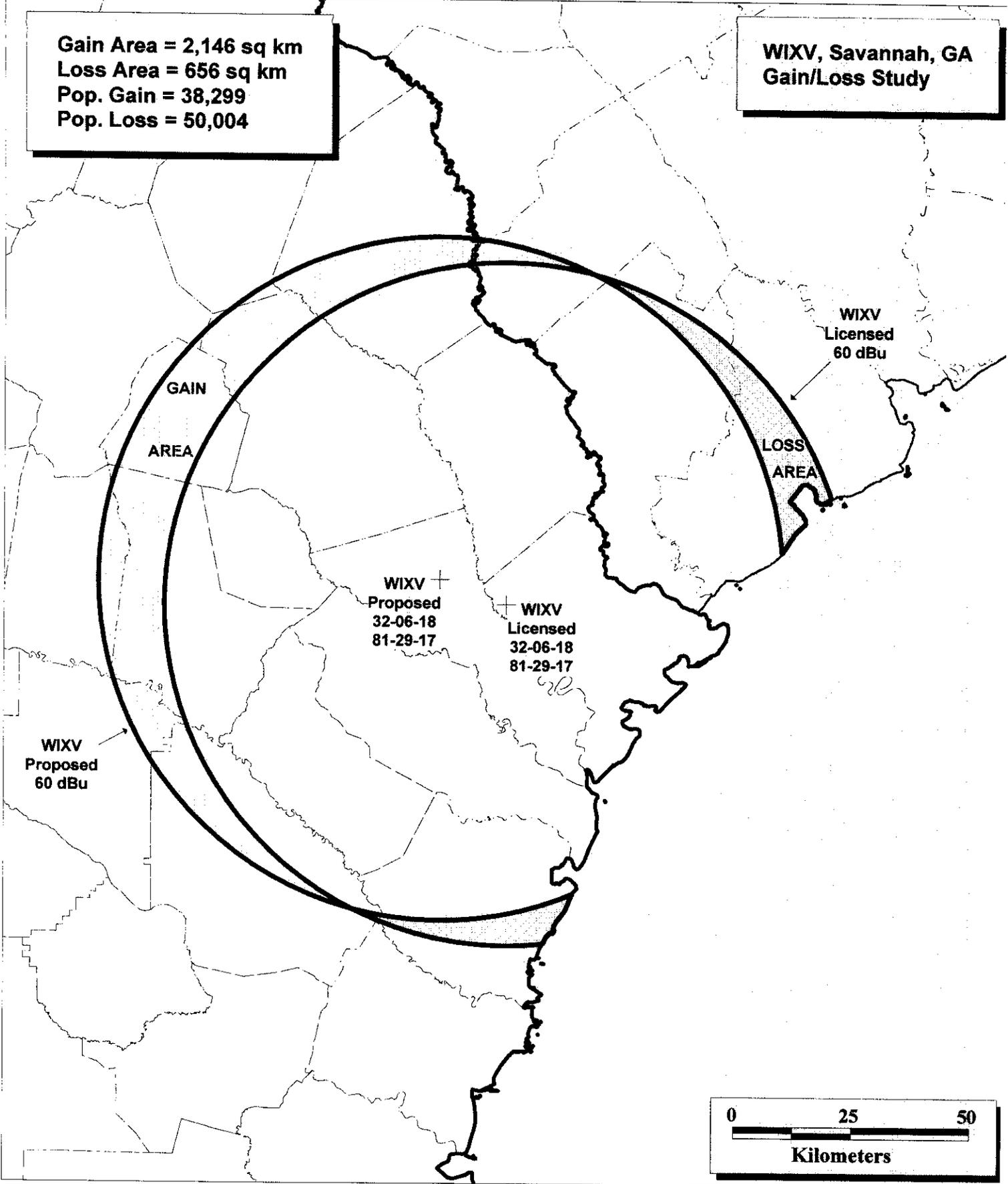


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Exhibit E, Figure 5

Gain Area = 2,146 sq km
Loss Area = 656 sq km
Pop. Gain = 38,299
Pop. Loss = 50,004

WIXV, Savannah, GA
Gain/Loss Study



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Chelsea, AL 35043
205.618.2020
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Exhibit E, Figure 6

EXHIBIT A

station WIXV
Savannah, Georgia

Cumulus Licensing Corp. ("Cumulus"), licensee of Station WIXV, Savannah, Georgia, hereby agrees to have WIXV's transmitter site reference coordinates changed. Cumulus will file an application consistent with the Commission's spacing rules, if necessary, should the Commission approve the change in reference coordinates. Cumulus understands that this statement may be used in a filing with the Commission and hereby authorizes its use for that purpose.

I verify that this statement is true, complete and correct to the best of my knowledge and belief and is made in good faith.

CUMULUS LICENSING CORP.

By: Richard S. Dunning
Its: Vice President

'B

U.S. Census Bureau



Subject	All ages		18 years and over	
	Numbe	Percent	Numbe	Percent
RACE				
Total population	452	100.0	311	100.0
One race	452	100.0	311	100.0
White	180	39.8	137	44.1
Black or African American	263	58.2	167	53.7
American Indian and Alaska Native	0	0.0	0	0.0
Asian	4	0.9	2	0.6
Native Hawaiian and Other Pacific Islander	0	0.0	0	0.0
Some other race	5	1.1	5	1.6
Two or more races	0	0.0	0	0.0
HISPANIC OR LATINO AND RACE				
Total population	452	100.0	311	100.0
Hispanic or Latino (of any race)	12	2.7	9	2.9
Not Hispanic or Latino	440	97.3	302	97.1
One race	440	97.3	302	97.1
White	173	38.3	133	42.8
Black or African American	263	58.2	167	53.7
American Indian and Alaska Native	0	0.0	0	0.0
Asian	4	0.9	2	0.6
Native Hawaiian and Other Pacific Islander	0	0.0	0	0.0
Some other race	0	0.0	0	0.0
Two or more races	0	0.0	0	0.0

(X) Not applicable

Source: U.S. Census Bureau, Census 2000 Redistricting Data (Public Law 94-171) Summary File, Matrices PL1, PL2, PL3, and PL4.

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greeleyville, sc



GREELEYVILLB SC

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Williamsburg HomeTown Chamber

Williamsburg County

Population: 36,815

Williamsburg County Offices: Post Office Box 330, Kingtree, SC 29556

Telephone: (843) 354-9321

County Supervisor: Richard Treme

Williamsburg County is located in the southern tip of the Pee Dee section of South Carolina. The county encompasses 936.97 square miles. If history is your specialty, Williamsburg County has plenty to offer, including many Revolutionary War battlefields and lots of stories about General Francis Marion. Annual rainfall in Williamsburg County measures 51.6 inches, with an average yearly temperature of 62.5 degrees. January's average temperature is 44 degrees (with July's temperature averaging 80.1 degrees).

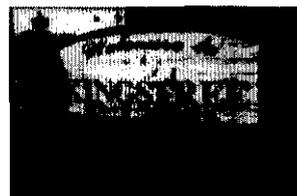
Kingtree

Population: 3,858

Town Hall: Post Office **Box** 207, Kingtree, SC 29556

Telephone: (843) 354-7484

Mayor: James Kirby



Kingtree serves as the county seat and also serves as the business center for over 36,000 residents. **An** agricultural based community, Kingtree is home to one of the largest cotton gins and tobacco markets in the state. Situated 75 miles from Charleston, Columbia, and Myrtle Beach, Kingtree is accessible by two major highways, US 52 **and** US 527.

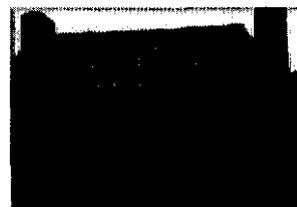
Greeleyville

Population: 464

Town Hall: Post Office Box 212, Greeleyville, SC 29056

Telephone: (843) 426-2111

Mayor: Isaac Holmes



Greeleyville became chartered on December 29, 1893. The town is located on the main stretch of **U.S.** Highway 521. Each Memorial Day weekend, the town hosts its annual "Flag Day" festival. This celebration has **grown** to be a very popular festival in the county. The town flag has a picture of old Town Hall and **two** arms, one black and one white, holding a tobacco leaf and a cotton bowl. This is a symbol of the cooperation among all the people in Greeleyville with

also a symbol of the agricultural heritage.

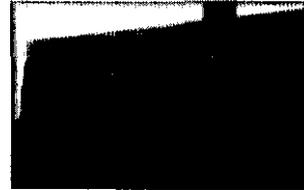
Hemingway

Population: 829

Town Hall: Post Office Box 968, Hemingway, SC 29554

Telephone: (843) 558-2824

Mayor: Grady Richardson



Hemingway is located just a short distance from the Grand Strand of South Carolina, as well as Florence, Columbia and Charleston. Hemingway is the home of the richest bar-b-que festivals in South Carolina, "The Bar-B-Que Shag Festival." Hemingway is also home to the only Tupperware manufacturing plant in North America.

Lane

Population: 523

Town Hall: Post Office Box 39, Lane, SC 29654

Telephone: (843) 387-5151

Mayor: Bill Wheeler

Established in 1856, Lane is bisected by the Main north-south CSX Railroad line. Located in a rural setting, Lane is situated in short distance southeast of the intersection of US Highways 52 and 521. The water, provided by a modern municipal water system from ground water sources, was named the best drinking water by the SC Rural Water Association in 1990.

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130 East Main Street, Kingstree, South Carolina 29556

Phone: 843-355-6431 • Fax: 843-355-3343

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All Businesses

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Business Name	Address
Bank Of Greeleyville (843) 426-2161	78 Main St Greeleyville, SC Map
Bank Of Greelewill (843) 426-2161	223 Varner Ave Greeleyville, SC Map
Greeleyville Appliance Repair (843) 426-2935	Main St Greeleyville, SC Map
Greeleyville Baptist Church (843) 426-2224	136 Varner Ave Greeleyville, SC Map
Greelewill Elementary _____ (843) 426-2116	71 Varner Ave Greeleyville, SC Map
Greelewill Home Mntnc Svc (843) 426-2259	88 Society St Greeleyville, SC Map
Greelewill Package Store (843) 426-2427	80 N Main St Greeleyville, SC Map
Greeleyville Pharmacy (843) 426-2170	105 S Main St Greeleyville, SC Map
Greelewill Police Dept (843) 426-2114	Greeleyville, SC Map
Greeleyville Service Ctr (843) 426-2371	145 N Main St Greeleyville, SC Map
Greeleyville Town Hall (843) 426-2111	Greeleyville, SC Map
Greeleyville Traffic Court (843) 426-2270	Main St Greeleyville, SC Map

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All Businesses

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Business Name

Address

[Newton's Auto World](#)
(843) 426-2020

9988 Highway 521
Greeleyville, SC [Map](#)

[Supreme Auto Sales](#)
(843) 382-9346

2509 Easler Hwy
Greeleyville, SC [Map](#)

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Business Name	Address
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Bougainvillea Clinique (407) 678-3116 Website	Serving Your Area Darlington, SC

All Businesses

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Business Name	Address
Greeleyville Medical Ctr (843) 426-2180	86 N Main St Greeleyville, SC Map

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Business Name

Address

[Greeleyville Super G](#)
(843) 426-2338

101 E Murray Blvd
Greeleyville, SC [Map](#)

[Vernon Grocery](#)
(843) 382-5571

Rr 2
Greeleyville, SC [Map](#)

[River Road Grocery](#)
(843) 426-4221

20 Cod Ln
Greeleyville, SC [Map](#)

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Business Name

Address

[Carolina Pizza](#)
(843) 426-2955

C E Murray Blvd
Greeleyville, SC [Map](#)

[Railcar Restaurant](#)
(843) 426-2872

128 Barner Ave
Greeleyville, SC [Map](#)

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All Businesses

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Business Name

Address

[Leonard Chapel Ame Church](#)
(843) 426-2384

Rr 2
Greeleyville, SC [Map](#)

[Mc Dowell Presbyterian Church](#)
(843) 426-2505

Rr 2
Greeleyville, SC [Map](#)

[Mount Zion Ame Church](#)
(843) 426-2495

Rr 1
Greeleyville, SC [Map](#)

[Mt Vernon Methodist Church](#)
(843) 382-2647

132 Easter Hwy
Greeleyville, SC [Map](#)

[Mt Zion Baptist Church](#)
(843) 426-2939

Rr 2
Greeleyville, SC [Map](#)

[St Asia Baptist Church](#)
(843) 426-2542

Rr 2
Greeleyville, SC [Map](#)

[St John 4-B Baptist Church](#)
(843) 426-2949

Rr 1
Greeleyville, SC [Map](#)

[St John Apostolic Church](#)
(843) 426-2499

Rr 1
Greeleyville, SC [Map](#)

[St John Baptist Church](#)
(843) 382-9006

Rr 2
Greeleyville, SC [Map](#)

[Sumrnerton Southern Methodist](#)
(803) 473-7729

Rr 2
Greeleyville, SC [Map](#)

[Trinity Baptist Church](#)
(843) 426-2221

Rr 1
Greeleyville, SC [Map](#)

[Wilson United Methodist Church](#)
(843) 426-4866

Ce Murray Blvd
Greeleyville, SC [Map](#)

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CERTIFICATE OF SERVICE

I, Kay D. Dallosta, a secretary in the law firm of Shook, Hardy and Bacon, do hereby certify that I have on this 31st day of March, 2003, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Counterproposal" to the following:

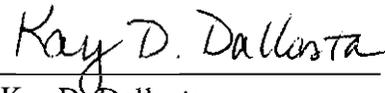
* Ms. Rolanda F. Smith
Media Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Matthew K. Wesolowski
SSR Communications, Inc.
5270 West Jones Bridge Road
Norcross, GA 30092-1628
(Petitioner)

Cumulus Licensing Corp.
3535 Piedmont Road
Building 14, 14th Floor
Atlanta, GA 30305
(Licensee of WIXV)

Miller Communications, **Inc.**
P.O. **Box** 1269
Sumter, SC 29151
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Kay D. Dallosta