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

AUG 15 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 03-144
Table of Allotments)	
FM Broadcast Stations)	RM No. 10733
(Gunnison, Colorado))	

To: Assistant Chief, Audio Division
Media Bureau

COUNTERPROPOSAL

Mayflower-Crawford Broadcasters ("MCB"), by its counsel, submits this counterproposal in the above-captioned proceeding.¹ MCB requests that the Commission amend the FM Table of Allotments to delete Channel 272A at Gunnison, Colorado and allot Channel 272C2 at Crawford, Colorado as that community's first local service. Effectuating this reallocation will require other changes which are described more fully below. If its Counterproposal is granted, MCB will file an application for the new allotment on Channel 272C2 at Crawford, Colorado and construct the facility as authorized.

I. PRELIMINARY MATTERS

1. To facilitate the allotment of Channel 272C2 to Crawford, Colorado as that community's first local service, a channel change for Station KVLE-FM, Gunnison, Colorado from Channel 272A to Channel 299A, is necessary. MCB has not secured the consent of the licensee of KVLE-FM to the change, and requests that the Commission issue an Order to Show Cause to the licensee for the channel change. The licensee will be reimbursed for the costs associated with the channel change in accordance with the criteria established in *Circleville, Ohio*, 8 FCC 2d 159 (1967). MCB plans to enter into discussions with the licensee regarding the

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proposed channel change (which can be implemented at Station KVLE-FM's current licensed site). If an agreement can be reached concerning the channel change, MCB will supplement its counterproposal with the consent of the licensee

2. Channel 270C2 at Olathe, Colorado is currently a vacant allotment at coordinates 38-36-18 NL 107-58-54 WL with no site restriction. To accommodate the allotment of Channel 272C2 to Crawford, Colorado, the reference site coordinates must be changed to 38-36-25 NL and 108-9-47 WL. The coordinate change results in a site restriction of approximately 15 kilometers. This is less than half of the hypothetical radius of city-grade coverage, and is thus compliant with section 73.315 of the Commission's Rules.²

3. The following table summarizes the changes requested in this Counterproposal:

City	Existing Channel	Proposed Channel
Crawford, Colorado	-----	272C2
Gunnison, Colorado	252C3, 265C2, ³ 272A, 299C3	252C3, 265C2 299A

II. CONFLICT WITH NPRM

4. As demonstrated in the attached Engineering Exhibit, the proposed allotment of Channel 272C2 at Crawford, Colorado, conflicts with the NPRM's proposed allotment of Channel 299C3 to Gunnison, Colorado as well as a pending site change for channel 272A at

¹ See *Notice of Proposed Rule Making*, DA 03-2093, released July 1, 2003 ("*NPRM*").

² The new reference coordinates for Channel 270C2 at Olathe, Colorado place the site on land that is approximately 200 meters higher in elevation than the present site. The new site provides an unobstructed line of sight to the community of license, and represents no change in the area served by the proposed allotment, though there is a net loss of 1,982 persons within the hypothetical interference-free contour.

³ On July 5, 2002, the allotment of this channel was proposed in a Notice of Proposed Rule Making, 17 FCC Rcd 12824 (MB 2002)

Breckenridge, Colorado⁴. KVLE-FM presently operates on Channel 272A at Gunnison, Colorado. To facilitate the allotment of Channel 272C2 to Crawford, Colorado, MCB proposes deleting the Channel 272A allotment at Gunnison and adding Channel 299A, requiring KVLE-FM to change channel while remaining at its licensed coordinates (38-33-53 NL and 106-55-38 WL) The allotment of Channel 299A at KVLE-FM's licensed coordinates conflicts with the NPRM's proposed allotment of Channel 299C3 at Gunnison with coordinates 38-40-48 NL and 106-46-48 WL. MBC's counterproposal is clearly preferred because it will provide first local service to the community of Crawford, Colorado, while the NPRM's proposal would provide a fourth allotment to Gunnison, Colorado. See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982)

III. TECHNICAL COMPLIANCE

A. Allotment of Channel 272C2 to Crawford, Colorado

5. As demonstrated in the attached Engineering Exhibit, Channel 272C2 can be allotted to Crawford at coordinates 38-32-5 NL and 107-30-27 WL consistent with Sections 73.207 and 73.315 of the Commission's Rules. The contour map in the Engineering Exhibit demonstrates that a 70 dBu signal can be placed over the community of Crawford from the proposed reference point. The proposed allotment will provide first local service to the community of Crawford.

6. Crawford satisfies the Commission's definition of community for allotment purposes. Crawford was incorporated in 1910 and is listed as a town in the 2000 U.S. Census with a population of 366. Crawford has its own post office and zip code (81415). In addition to an airport, a community library, local fire department and several churches, dozens of

⁴ Petition for rulemaking filed April 23, 2003, by Lenora Alexander, licensee of KAGM, KAGM Joint Venture,

businesses, including Mad Dog Ranch, Horse Hideout Bed, Barn and Breakfast, Crawford Country Bank, Antique Tackle, Bee Yard Gardens, K Dahl Glass Studio and Crawford Country Store and Motel are located in Crawford. Crawford has its own chamber of commerce (www.crawfordcountry.org) which sponsors several events for the community during the year. See Exhibit A The Crawford State Park and Crawford Reservoir were created in the 1960s and attract 80,000 to 100,000 visitors to the area annually. *Id.*

B. Station KVLE-FM Channel Change from Channel 272A to Channel 299A

7. In order to allot Channel 272C2 to Crawford, Colorado, Channel 272A must be deleted at Gunnison, Colorado. MCB proposes to substitute Channel 299A for Channel 272A at Gunnison, Colorado. Station KVLE-FM is currently licensed on Channel 272A at Gunnison, but Channel 299A can be allotted to Gunnison at the KVLE-FM licensed transmitter coordinates.

C. Change in Reference Coordinates for Vacant Channel 270C2 at Olathe, Colorado

8. To permit the allotment Channel 272C2 at Crawford, Colorado, the reference coordinates for the vacant allotment on Channel 270C2 at Olathe, Colorado must be changed to 38-36-25NL and 108-9-49 WL. A site restriction of approximately 15 kilometers will be necessary to protect the proposed new Crawford 272C2 allotment.

IV CONCLUSION

9. The Counterproposal will provide a first local service to Crawford, Colorado which advances Priority 3 of the Commission's assignment policies and procedures. The proposal in the NPRM advances Priority 4. Thus, adopting MCB's Counterproposal will result

in a preferential arrangement of allotments. See *Revision of FM Assignment Policies, supra*.

Accordingly, the Commission should adopt the Counterproposal.

Respectfully submitted,

MAYFLOWER-CRAWFORD BROADCASTERS

By:


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Washington, D.C. 20005
(202) 216-5798

Its Counsel

August 15, 2003

Exhibit A



Crawford Area Chamber of Commerce

- [membership](#)
- [chamber events](#)
- [newsletter](#)
- [about crawford](#)
- [member links](#)
- [map to crawford](#)
- [contact the chamber](#)

Membership directory - 2003



A B C D F G H J K L M N P R S T V W Y

Business Name	Phone (Area Code 970)	Web Address
A		
Antique Tackle	921-6474	antiquetackle.net
Archer, Pam		
A.S.A.P Construction Inc.	921-5363	
B		
Bee Yard Gardens	921-8733	
Bid-U-Well Guest Ranch	921-7070	
Black Canyon Webworks	921-3461	blackcanyonwebworks.com
Boardwalk Restaurant		

& Lounge 921-4905
Bross Hotel 527-6776 paonia-inn.com
Burke, Kim & Chris

C

C & C Creations 921-4300
Clark, Bill & Charlotte
Cocker Kids Foundation 921-4855 mdrfc.com
Cook, Paul & Ramona
Costa, Larry & Betty
Cotten Veterinary Clinic 872-3476
Cramer, Kathy & Tim
Crawford Country Bank 921-4122
**Crawford Country
 Gunsmithing** 921-3630
**Crawford Country Store and
 Motel** 921-5040 or 921-5061 crawfordcountrystoreandmotel.com
Cuttin' Loose 921-6800

D

**Delta County Independent ,
 AICA Leader Publilshing Co.** 874-4421
Dependable Lumber 527-4197
DMEA 970-249-4572 dmea.com
Don Laux Construction 921-4554

F

First National Bank of Paonia 527-4141 fnb4u.com
First State Bank of Hotchkiss 872-3111 fsb-hotchkiss.com

G

Geddes Aviation 921-3018
 Geddes, Kathy, Accountant 921-3016
 Goffin, Barb & Gene 921-5100

H

Hamrick & Associates, Inc.
 Public Accountants 874-7621
 Hansen Cattle Ranch, Inc. 921-4444
 Hellman Motor Co. 874-4444 hellmanmotorco.com
 High Country Printing &
 Graphics 527-4567
 High Country Shopper 527-4576 highcountryshopper.com
 Hotchkiss Community Federal
 Credit Union 872-4277

J

Joyce I. Reid, Real Estate
 Appraiser 921-6761

K

KDahl Glass Studios 921-6160 kdahlglass.com
 Kent, Jan
 Kevin Parks Insurance Agency
 State Farm Insurance 527-6200
 Kinder Morgan Inc. 874-4432 kindermorgan.com

Klatt, Carl

L

Last Frontier Lodge 921-5150 coloradodirectory.com/lastfrontierl

M

Mad Dog Ranch Fountain Cafe	921-7632	cocker.com
Mad Dog Ranch Trading Post	921-7637	cocker.com
Mad Dog Water Company	921-4855	
Majestic Traffic Control	921-4224	
Mail & Copy Central	872-5555	
Martin Cegielski Electrical Contractor Inc.	921-4300	
McGregor Insurance Agency	872-5285	mcgregorinsurance.net
Monart School of the Arts	921-6164	drawingtoday.com
Moore, John		

N

Needlerock Inn	921-3373	
Needlerock Realty	921-5331	needlerockrealty.com
Needlerock Realty, Richard C. Steckel, Broker	921-5331	
Nichols, Keith, Attorney	921-3450	
North Fork Merchant Herald	872-2664	
North Fork Vision Center	872-2020	optometrists.org/northfork

P

Paonia State Bank 527-4122

Pipher Construction 921-5313

Pipher, Diane

Pipher Forest Products 921-6222

Pipher WoodWorking 921-3995

Polson, Gary

Progressive Real Estate 527-5700

R

RimRock Store 921-7665

**Rocky Mountain Homestay
Guest House** 921-3867 rmhomestay.com

S

Scenic Mesa Ranch 921-3377 scenicmesa.com

Silver State Service 303-750-6922

Simkins, Don & Char

Smith Fork Ranch 921-3454 smithforkranch.com

**Mickey Smith, Southwest
Sculptor in Metallized Ceramic
and Bronze** 921-5505 larancheria.com

Stengel Gun Shop 872-3708

Stewart Homestead Cabin 921-6751

Stone House Inn 921-5683 stonehouseinn.net

T

The Horse Hideout	921-6044	horsehideout.com
The Laughin' Place Cartoon Postcards & Greeting Cards	921-3200	cartoonpostcards.com
The Terrien Group	921-3132	
Todd's Treasures Antiques & Collectibles	921-6151	
Trollhagen Tree Ranch	921-6000	trollhagen.com

V

Valley Survey, Inc.	921-3017	
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W

Woolly Designs	921-3834	woollydesigns.com
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Wooster, Alice

Y

Yeoman, Jim

[Back to home](#)
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Crawford, a proud American Cowntown!

CACC
 P.O. Box 22
 Crawford, CO 81415



Crawford Area Chamber of Commerce

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Crawford Chamber Events



Calendar of events, description and schedule

Old Timers & Newcomers Potluck Dinner

Feb. 8, 2003

A fun time for all of Crawford's folks to get to know our community better.



Pioneer Days

June 12, 13 & 14, 2003



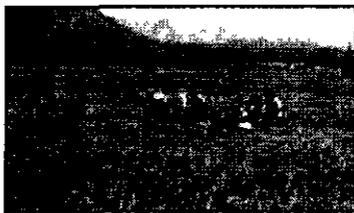
Pioneer Days is an annual celebration of Crawford's heritage. The weekend festivities include a parade, arts and crafts booths, barbeques and



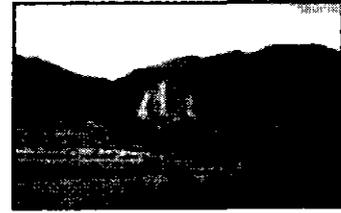
..... a fireworks finale.



Render the Rock July 19, 2003



Render the Rock is an annual invitation to artists worldwide to capture the majesty of Needle Rock, a local volcanic monolith. The weekend event culminates with an auction of the artists' works. The proceeds are used for community improvements.



Crawford Town Lighting & Parade of Lights

Nov. 28, 29 & 30, 2003

Don't miss the Crawford Town Lighting and Parade of Lights on Friday, Nov. 28th. Crawford becomes a village of lights with an exciting parade,



special entertainment, extended shop hours, wagon rides and a craft fair. The fun continues for the whole weekend through Sunday, Nov. 30th.

Holiday Appetizer & Dessert Potluck & Holiday Musical Performance

Dec. 14, 2003



CACC invites Crawford area residents to the community room at Crawford Town Hall for an afternoon pre-holiday gathering. Everyone is asked to bring an appetizer or dessert to share. The Chamber will provide beverages. Drawings will be held for gift baskets from local businesses. Entertainment will include holiday music.

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Crawford, a proud American Cowntown!

CACC
P.O. Box 22
Crawford, CO 81415

info@crawfordcountry.org



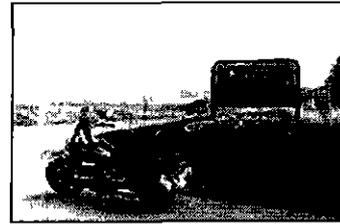
A little about the Crawford Reservoir



The Smith Fork Project, which includes the Crawford Dam and Reservoir, was conceived as a way of storing high-water runoff. Construction began on the Crawford Dam in 1960, and took three shifts of workers working around the clock, two years to complete the Dam.

From bedrock to crest, the Crawford Dam is a 195-foot earth-filled structure. Its about two million yards of packed dirt. The intake towers, diversion tunnel, spillway and "key" required close to a million yards of concrete. The blast nearly shock Crawford from its foundations

All of the rock for the facing of the dam came from the base of the granite cliffs on the northwest edge of town. All of it, a million and a half tons, came from a single dynamite blast. A forty foot long tunnel was blasted back into the hill then filled with with twenty tons of dynamite. When it was touched off , they had enough rock to pave both sides of the dam.



Dedication of the Crawford Dam came on April 20, 1963. The Crawford State Park, created in conjunction with the reservoir, attracts 80,000 to 100,000 people every year. The reservoir is used for fishing, boating, water-skiing and is the mainstay of the local tourist economy.

The Dobes

Black Canyon

Crawford

Crawford Reservoir

Needle Rock

Gould Reservoir

Return to the Crawford Points of Interest Map Page

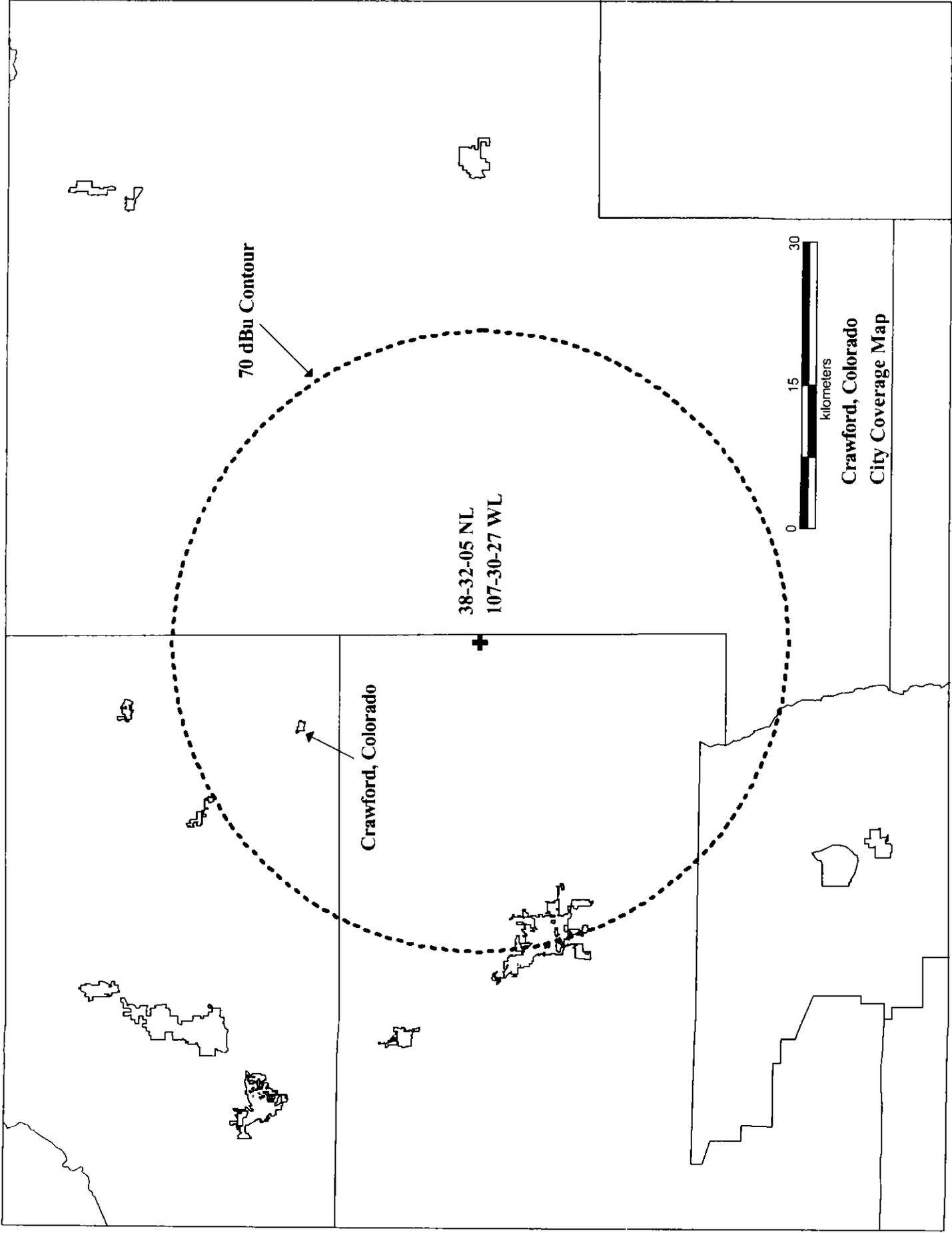
Engineering Exhibit

Channel Studies

Substitution of 299A for KVLE		38-33-53 106-55-38					
Call	City	Channel	Latitude	Longitude	Distance	Req'd	Margin
ADD	Gunnison, CO	299C3	38-40-48	106-46-48	18	142	-124
KBKL	Grand Junction, CO	300C	39-3-56	108-44-52	167	165	2
ADD	Crested Butte, CO	246C3	38-50-42	106-54-00	31	12	19

NEW allotment of 272C2 at Crawford, Colorado		38-32-5 107-30-27					
Call	City	Channel	Latitude	Longitude	Distance	Req'd	Margin
ADD	Breckenridge, CO	272A	39-25-52	106-6-17	157	166	-9
VAC	Olathe, CO	270C2	38-36-18	107-58-54	42	58	-16
ADD	Olathe, CO	270C2	38-36-25	108-9-47	58	58	0
KQZR	Craig, CO	273C	40-11-45	107-56-0	188	188	0
KSMT	Breckenridge, CO	272A	39-29-44	106-1-44	167	166	1

NEW Site for 270C2 Olathe, Colorado		38-36-25 108-9-47					
Call	City	Channel	Latitude	Longitude	Distance	Req'd	Margin
VAC	Olathe, CO	270C2	38-36-18	107-58-54	16	166	-150
ADD	Crawford, CO	272C2	38-32-5	107-30-27	58	58	0
ADD	Eagle, CO	269C1	39-45-15	106-54-13	168	58	110



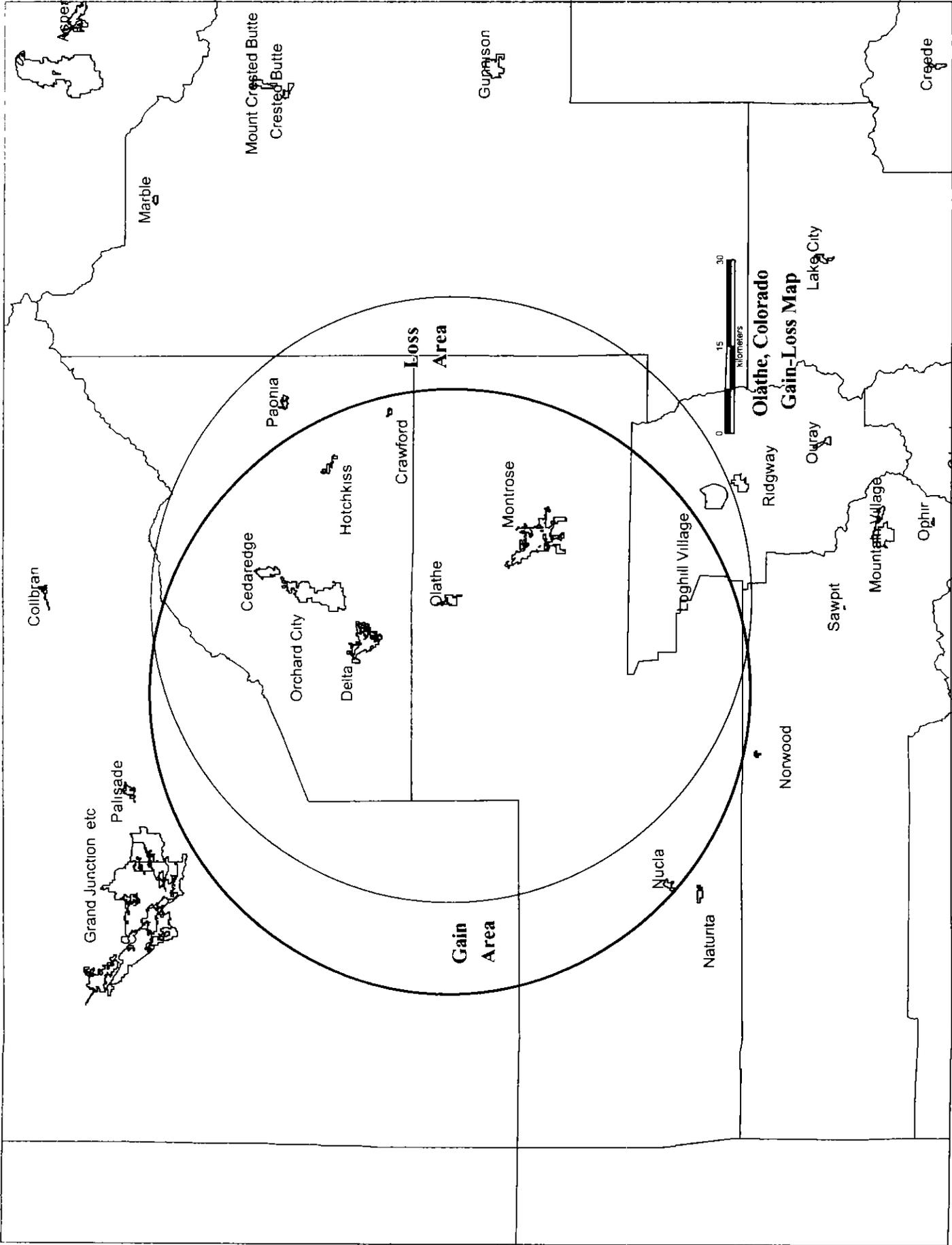
70 dBu Contour

38-32-05 NL
107-30-27 WL

Crawford, Colorado

0 15 30
kilometers

Crawford, Colorado
City Coverage Map



CERTIFICATE OF SERVICE

I, Scott C Cinnamon, do certify that I have on this 15th day of August, 2003, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Counterproposal" to the following:

* Rolanda F. Smith
Audio Division
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Dana J. Puopolo
2134 Oak Street, Unit C
Santa Monica, CA 90405



Scott C. Cinnamon

* By hand