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NOV 21 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 21, 2003

By Hand Delivery
Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

RE: Petition For Rulemaking
Hubbardston, Michigan - Channel 279A
Living Proof, Inc., Petitioner – FRN: 0006-2429-11

Dear Ms. Dortch:

Living Proof, Inc., by and through its attorneys, hereby submits this Petition for Rulemaking to reserve the above-reference vacant commercial FM allotment for noncommercial use. This Petition is being submitted in accordance with the Public Notice, dated September 30, 2003, requiring that such Petitions be submitted by November 21, 2003 (DA 03-2990).

Should there be any questions regarding this Petition, please contact undersigned counsel.

Sincerely,

Harry C. Martin
Lee G. Petro

Counsel for Living Proof, Inc.

Enclosures

cc: Ms. Rolanda F. Smith, Audio Division
Media Bureau – Room 2-B450

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

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NOV 21 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:	}	
	}	
Amendment of Section 73.202(b),	}	**MB Docket No.:**
Table of Allotments,	}	**RM-_____**
FM Broadcast Stations	}	
	}	
(Hubbardston, Michigan)	}	

TO: CHIEF, MEDIA BUREAU

PETITION FOR RULEMAKING

Living Proof, Inc. ("Living Proof"), by and through its attorneys, hereby submits this Petition for Rulemaking to reserve Channel 279A, Hubbardston, Michigan, for noncommercial use. This Petition is being submitted in response to the *Public Notice*[1] establishing a filing window for reserving existing, vacant commercial FM allotments in accordance with the procedures set forth in the recently-adopted noncommercial FM reservation rules.[2]

As discussed in more detail below, Channel 279A at Hubbardston, Michigan, can be reserved for noncommercial use under the procedures and standards set forth in the *Public Notice* and the *NCE Second Report and Order*. In particular, supporting this Petition is an engineering statement, attached hereto as Exhibit One, demonstrating that no reserved channel can be allotted to serve Hubbardston, and that the proposed reservation would provide significant first and second NCE service to the proposed primary service contour of the facility in excess of the 10%

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1 *Media Bureau Opens Window to Permit Noncommercial Educational Reservation Showings for Certain Vacant FM Allotments*, Public Notice, DA 03-2990 (rel. Sept. 30, 2003) (the "*Public Notice*").

2 *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Second Report and Order, 18 FCC Rcd 6691 (2003) ("*NCE Second Report and Order*").

threshold established in the *NCE Second Report and Order*. Therefore, Living Proof respectfully submits that the reservation of Channel 279A at Hubbardston, Michigan, will be in the public interest.

I. BACKGROUND

In 1997, Congress granted authority to the Commission to hold auctions to resolve conflicts among mutually-exclusive new and major change applications.[3] In response, the Commission determined that NCE entities seeking nonreserved, commercial FM and Television channels would be required to participate in auctions.[4] However, before this rule came into effect, the U.S. Court of Appeals for the D.C. Circuit vacated the requirement for NCE entities to participate in auctions for nonreserved spectrum.[5]

In response to the *NPR* decision, and based on the subsequent comments submitted in response to a *Second Further Notice of Proposed Rulemaking*[6], the Commission modified the process by which qualifying NCE entities could reserve noncommercial FM and TV spectrum for noncommercial educational use. Noting that a large number of FM allotments had been made prior to the modification of the noncommercial reservation rules, the Commission indicated that it would establish a window by which those allotments made prior to August 7, 2000, could be reserved, under certain circumstances.[7]

---

[3] *Balanced Budget Act of 1997*, Pub. L. No. 105-33, Title III, 111 Stat. 251 (1997).

[4] *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Report and Order, 15 FCC Rcd 7386, 7429 (2000).

[5] *NPR v. FCC*, 254 F.3d 226, 229 (D.C.Cir. 2001).

[6] *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Second Further Notice of Proposed Rulemaking, 17 FCC Rcd 3833 (2002).

[7] *NCE Second Report and Order*, ¶ 39.

The Commission established a three-part test to reserve a commercial FM allotment. Specifically, the reservation proponent must demonstrate that:

> (1) maximum class facilities at the proposed allotment site would provide first or second NCE service to at least ten percent of the population within the proposed station's service area and that such population is at least 2000 persons;
>
> (2) no rule-compliant facility can be authorized at maximum antenna height above average terrain and with maximum effective radiated power on any reserved band channel at four equally-spaced locations with the predicted 60 dBu signal of the maximum same class facility centered on the proposed community of license; and
>
> (3) no same class rule-compliant facility can be authorized at minimum antenna HAAT and with minimum ERP on any reserved band channel at the city center coordinates for the community of license.[8]

A "rule-compliant" facility would be one that would otherwise complies with the technical and spacing requirements for FM facilities, and that would not cause prohibited interference to existing television stations operating on Channel 6.[9] By satisfying these requirements, the proponent will have established that the vacant nonreserved FM allotment is qualified to be reserved solely for noncommercial, educational purposes. *Id.*

II. DISCUSSION

As shown in Exhibit One, Channel 279A qualifies for reservation under the Commission's rules. First, 3.98% (3,212 persons) of the population within the proposed service area will be receiving a first NCE service, and 56.15% (42,052 persons) of the population within the proposed service area will be receiving a second NCE service. Combined, these figures are substantially higher than the 10% population threshold established by the Commission.

---

8 *Id.* at ¶ 35.

9 47 C.F.R. 73.202(1)(a)(i)

In addition, the Engineering Statement also demonstrates that there are no available reserved FM channels that can be utilized to provide NCE service to Hubbardston, Michigan. First, the Engineering Statement shows that a minimum Class A facility (0.1 kW at 30 meters height above average terrain ("HAAT")) can not be allotted on any reserved FM channel. Moreover, the Engineering Statement also shows that, among 4 equally-spaced points within the proposed 60 dBu contour, a maximum Class A facility (6.0 kW at 100 meters HAAT) could not be allotted on any reserved FM channel.

Therefore, it is clear from the Engineering Statement both that a rule-complaint reserved channel FM allotment can not be made at Hubbardston, and "that NCE service is in fact needed" at Hubbardston,[10] In light of this showing, Living Proof respectfully requests that the Commission amend the FM Table of Allotments for Channel 279A at Hubbardston as follows:

Community, State	Current Channel No.	Proposed Channel No.
Hubbardston, Michigan	279A	279A*

Living Proof, Inc., certifies that it will apply for the requested channel if allotted, and, if successful in obtaining the construction permit for the facility, will construct the station.

---

10 *Id.* ¶ 33.

III. CONCLUSION

WHEREFORE, in light of the foregoing, Living Proof, Inc. respectfully requests that the Commission grant the petition for rulemaking and reserve Channel 279A at Hubbardston, Michigan for noncommercial use.

The reservation of the allotment would deliver 3,212 persons their first NCE service, 42,052 persons their second NCE service, and would best serve the public interest.

Respectfully submitted,

LIVING PROOF, INC.

By: _____

Harry C. Martin
Lee G. Petro

Fletcher, Heald & Hildreth PLC
1300 North 17th Street, 11th Floor
Arlington, Virginia 22209
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Telecopier - 760-812-0486

Its Counsel

November 21, 2003

Engineering Statement
In response to MMB Window Closing November 21, 2003
Providing for Conversion of
Commercial Allotments to Noncommercial Allotments

Hubbardston, MI 279A

Robert Moore
November 21, 2003

Public Notice DA 03-2990[1] and Report and Order 18 FCC Rcd 6691[2] state that three distinct engineering criteria must be satisfied to qualify an allotment. These must demonstrate 1) need for an additional NCE service, 2) unsuitability of any NCE channel at the site at the proposed city of license and 3) unsuitability of any NCE channel at four points near the edge of the protected contour surrounding the city of license. These will be demonstrated in order.

1) Need for Additional NCE Service – NCE Second Report and Order ¶34

The graphic below illustrates the 60 dBu coverage of existing NCE authorizations (shown in black) that intersect the 60 dBu contour of the proposed allotment when it is evaluated at it's allotment site (shown in red). The graphic demonstrates that 56.15 % (45,264 out of 80,619 people) of the population covered by the allotment would be newly served with first or second NCE service NCE programming by conversion of the channel to NCE status. Of these 3.98 % would receive their first NCE service (shown in red) and 52.16 % would receive their second NCE service (shown in green). The remaining population (shown in black) is already served by two NCE stations. This coverage significantly exceeds the 10% and 2,000 people specified in the R&O.

2) City of License Site – NCE Second Report and Order ¶35b

The city coordinates are not found at http://www.fcc.gov/mb/audio/bickel/atlas2.html. GNIS gives them as N 43 05 32 W 84 50 32. . A **minimum class** A facility (0.1 kW at 30 m HAAT) was evaluated at each NCE channel. The entries *IN* and *OUT* represent the incoming and outgoing contour overlap with each specified station, or spacing, as in FMCONT output, is given in km. Only negative results, indicating prohibited contour overlap or spacing violation, are displayed. The existence of even one negative value for a channel shows that that channel is not available at the specified site with the specified facilities. Note that all stations in the CDBS are included here, whether authorized or not, since most, if not all, are included in closed Mx groups, so there is no longer an opportunity for new entrants to file. This table shows that all the NCE channels are unavailable at this site for the specified facility.

3) Cardinal Sites – NCE Second Report and Order ¶35a

Availability was also evaluated at 27 km (28km class A class contour distance - 1 km) of from the city of license site at azimuths of 0, 90, 180 and 270 degrees. In these evaluations, a **class maximum facility** was utilized. The entries are interpreted as in 2). These tables show that no NCE channels are available at these sites for the specified facility.

Conclusion:

The criterion specified by the Commission is satisfied by this allocation and it can be considered for conversion to an NCE allocation.

---

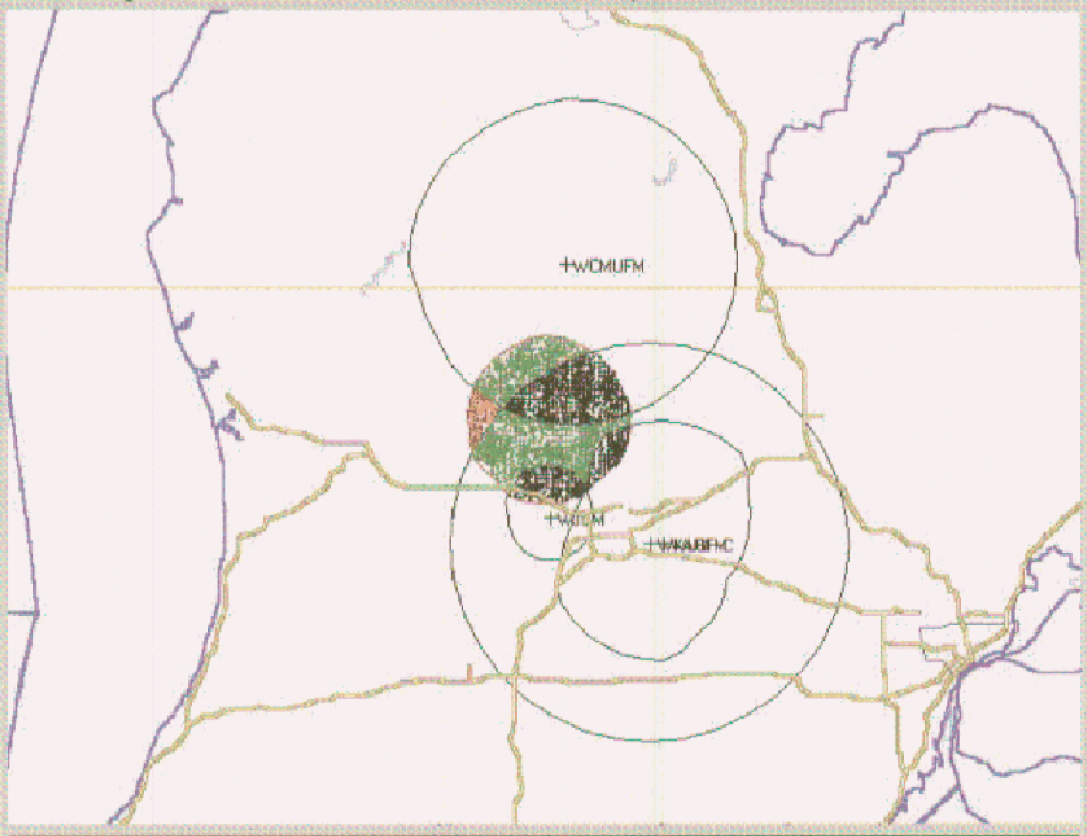
[1] *Media Bureau Opens Window to Permit Noncommercial Educational Reservation Showings for Certain Vacant FM Allotments*, Public Notice, DA 03-2990 (rel. Sept. 30, 2003) (the "*Public Notice*").

[2] *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Second Report and Order, 18 FCC Rcd 6691 (2003) ("*NCE Second Report and Order*").

1) Need for Additional NCE Service

Threshold Form

White Space Calculation for Hubbardston, MI



ChanCl	Status	Call	City	St	Owner	FacID	Dist	Az	Pop
201B	CP	WLGH.C	Leroy Town...	MI	Superior Communications	78460	60.16	136	0
203A	CP	WJOM	Eagle	MI	Michigan Community Radio	121794	34.91	176	0
208C1	LIC	WCMUFM	Mount Plea...	MI	Central Michigan Univ. Bd Of	9918	53.33	8	0
213B	LIC	WKARFM	East Lansing	MI	Michigan State University	41683	57.35	140	0

Find Stations | Delete Station | Distance (km) 200 | Mark Pops | ☑ Hide Unused St | ☑ Hide Zeros | Load List Box | Form Print

Plot Stations | Plot Scale 2.00 | Plot Pops | Graphics

Receiving First NCE Service: 3212 / 80619 (3.98%)

Receiving 2nd NCE Service: 42052 / 80619 (52.16%)

Total New Service: 45264 / 80619 (56.15%)

lat = 415226 lon = 853120

2) City of License Site

Showing of available NCE channels at Hubbardston, MI

Latitude 430532 Longitude 845032 ERP(Kw) 0.100 HAAT(m) 30 CCR AMSL(m) 255

Chan	Call	*IN*	*OUT*	Margin
201	WLGH	-22.4		
	WLGH.C	-45.7		
	WYCE.A	-8.9		
	WYCE	-9.3		
202	WLGH.C	-2.9		
	WEJC.A	-58.0		
	WEJC	-35.3		
203	WJCM	-41.4	-5.2	
204	CIMX			-59.9
	WIAA	-25.7		
205	WDBM	-21.1		
	WCMUFM		-1.8	
206	ALLO	-42.5		
	WCMUFM		-1.8	
207	WCMUFM	-36.1	-9.0	
208	WCMUFM	-102.3	-19.6	
209	WCMUFM	-36.1	-9.0	
210	WCMUFM		-1.8	
	CBEFM			-56.0
	WAYG	-5.9		
	WAYG.C	-16.2		
	WKARFM		-14.7	
211	WCMUFM		-1.8	
	WUCXFM	-25.7		
	WKARFM		-14.7	
212	WBLV	-53.3		
	WKARFM	-51.5	-22.0	
213	WKARFM	-116.8	-32.6	
214	WKARFM	-51.5	-22.0	
	990610	-7.2		
	990610	-7.2		
215	WKARFM		-14.7	
	980814	-27.3		
	990914		-5.1	
216	WKARFM		-14.7	
	WFUMFM	-7.3		
	990914		-5.1	
217	WCSG	-26.7		
	990914	-16.7	-12.3	
218	990914	-45.0	-22.9	
	WMHWFM	-14.8		
219	990914	-16.7	-12.3	
	WUOM	-62.2		
220	990914		-5.1	
	AP220	-31.5	-0.0	
	990720	-7.4		
	AP220	-12.9		
	AP220	-12.9		
	WKMY	-19.7	-6.7	-40.8

3) Cardinal Sites:

0 degrees:

Showing of available NCE channels at Hubbardston, MI

Latitude 432007 Longitude 845032 ERP(Kw) 6.000 HAAT(m) 100 COR AMSL(m) 349

Chan	Call	*IN*	*OUT*	Margin
201	WLGH	-24.2	-32.3	
	980505		-22.5	
	WLGH.C	-57.5	-50.3	
	WYCE.A	-20.8	-21.7	
	WYCE	-21.2	-22.0	
	WEJC.A	-41.8	-28.5	
	WEJC	-28.2	-19.7	
202	WLGH.C	-11.8	-7.6	
	WEJC.A	-106.0	-71.5	
	WEJC	-83.3	-62.7	
	WJOM		-3.1	
203	WEJC.A	-41.8	-28.5	
	WEJC	-28.2	-19.7	
	WGVUFM		-5.9	
	WJOM	-38.0	-45.8	
	WIAA	-1.8		
204	WJOM		-3.1	
	CIMX			-43.8
	WIAA	-68.9	-27.5	
	AP204		-14.3	
205	WIAA	-1.8		
	WDBM	-21.8	-33.6	
	WBLUFM	-8.4	-27.6	
	ALLO	-20.6	-11.2	
	WCMUFM	-7.8	-30.5	
206	WTRK	-15.5	-27.1	
	AP206		-10.7	
	ALLO	-80.3	-53.8	
	WCMUFM	-7.8	-30.5	
207	ALLO	-20.6	-11.2	
	AP207	-10.7	-17.6	
	WGNB		-0.9	
	WCMUFM	-85.6	-71.7	
208	WCMUFM	-151.8	-114.6	
209	WCMUFM	-85.6	-71.7	
	WLNZ		-26.9	
	WTAC		-5.7	
	AP209		-28.7	
210	WCMUFM	-7.8	-30.5	
	CBEFM			-39.9
	WAYG	-17.5	-23.8	
	WAYG.C	-28.2	-32.8	
	WUCXFM	-5.4		
211	WCMUFM	-7.8	-30.5	
	WUCXFM	-60.6	-41.0	
	WBLV	-13.7		
212	WUCXFM	-5.4		
	WBLV	-80.9	-40.8	
	WKARFM	-52.6	-36.8	
	WQAC	-16.8		
213	WBLV	-13.7		
	WKARFM	-117.9	-79.5	
	990610	-10.7	-8.9	
	990610	-10.7	-8.9	
	WQAC	-16.8		
214	WKARFM	-52.6	-36.8	
	990610	-53.3	-52.3	
	990610	-53.3	-52.3	
	AP215	-3.6	-16.5	
	WQAC	-24.0	-38.1	
	980814	-3.0	-11.8	
215	990610	-10.7	-8.9	
	990610	-10.7	-8.9	
	AP215	-14.5	-59.5	
	WQAC	-34.6	-80.8	
	WWZP.C	-0.6	-35.6	
	980814	-35.2	-54.8	
	990914	-10.3		
	WMHWFM	-2.8		
	WMHWFM	-2.5		
216	AP215	-3.6	-16.5	
	WQAC	-24.0	-38.1	
	980814	-3.0	-11.8	
	WOLW	-40.1	-12.2	
	WFUMFM	-22.8	-11.9	
	WOES		-4.3	
	990728		-8.8	
	990914	-10.3		
	WMHWFM	-2.8		
	WMHWFM	-2.5		
217	WQAC	-16.8		
	WCSG	-39.2	-35.4	
	WCHWFM		-12.7	
	WOES	-4.3	-47.0	
	990728	-17.3	-51.5	
	AP218		-7.2	
	990914	-24.6	-35.8	
	WMHWFM	-31.1	-37.0	
	990720		-3.0	
	WMHWFM	-12.3	-24.5	
218	WQAC	-16.8		
	WOES		-4.3	
	990728		-8.8	
	AP218	-19.8	-49.9	
	990914	-48.4	-78.5	
	WMHWFM	-64.4	-79.9	
	990720	-31.8	-47.0	
	WMHWFM	-27.5	-67.4	
	AP218		-27.8	
	990720	-3.7	-39.4	
219	AP218		-7.2	
	990914	-24.6	-35.8	
	WMHWFM	-31.1	-37.0	
	990720		-3.0	
	WMHWFM	-12.3	-24.5	
	WMCQ.A	-18.2	-18.3	
	WUOM	-65.6	-26.9	
	WMCQ.C	-3.0	-1.8	
	AP220	-9.1	-16.0	
	990720	-10.1	-17.8	
220	990914	-10.3		
	WMHWFM	-2.8		
	WMHWFM	-2.5		
	AP220	-47.1	-59.1	
	990720	-45.1	-60.7	
	AP220	-12.4	-12.7	
	AP220	-12.4	-12.7	
	WVXH	-2.5	-1.6	
	WKMY	-20.9	-21.5	-18.1

90 degrees:

Showing of available NCE channels at Hubbardston, MI

Latitude 430532 Longitude 843038 ERP(Kw) 6.000 HAAT(m) 100 COR AMSL(m) 314

Chan	Call	*IN*	*OUT*	Margin
201	WLGH	-56.8	-64.0	
	WLGH.C	-90.1	-82.1	
	WYCE.A	-5.7	-6.9	
	WYCE	-6.0	-7.1	
	WEJC.A	-21.0	-8.3	
	WEJC	-7.4		
202	WLGH	-18.6	-20.5	
	WLGH.C	-44.3	-38.5	
	WEJC.A	-85.4	-51.0	
	WEJC	-62.5	-42.2	
	WJOM	-8.7	-15.3	
203	WLGH.C		-0.3	
	WEJC.A	-21.0	-8.3	
	WEJC	-7.4		
	WJOM	-50.8	-58.6	
	CIMX			-6.7
204	WLGH.C		-0.3	
	WJOM	-8.7	-15.3	
	CIMX	-25.6	-25.4	-81.7
	WIAA	-33.9		
	AP204	-1.1	-35.7	
	WDBM	-15.0	-19.3	
205	CIMX			-6.7
	WDBM	-52.0	-62.8	
	WAKL		-19.2	
	WAKL.A		-23.5	
	WBLUFM		-12.1	
	ALLO	-27.7	-18.0	
	WCMUFM		-1.5	
206	WDBM	-15.0	-19.3	
	WTRK	-23.8	-35.0	
	AP206		-10.8	
	ALLO	-87.3	-60.7	
	AP207	-3.3	-6.8	
	WCMUFM		-1.5	
207	ALLO	-27.7	-18.0	
	WJKNFM		-3.3	
	981224		-3.6	
	AP207	-43.9	-50.2	
	WCMUFM	-57.2	-43.4	
208	AP207	-3.3	-6.8	
	WCMUFM	-123.5	-86.2	
	WLNZ		-10.7	
209	WCMUFM	-57.2	-43.4	
	WOCR		-10.9	
	990920		-17.0	
	WLNZ	-17.3	-54.1	
	WTAC	-11.5	-32.3	
	AP209		-29.2	
	AP209		-32.1	
	CBEFM			-2.9
210	WCMUFM		-1.5	
	WLNZ		-10.7	
	CBEFM	-19.7	-20.0	-77.9
	WAYG	-3.5	-10.8	
	WAYG.C	-12.6	-17.3	
	WUCXFM	-17.5	-10.3	
	WKARFM		-28.2	
211	WCMUFM		-1.5	
	CBEFM			-2.9
	WUCXFM	-72.7	-53.0	
	WKARFM		-28.2	

Chan	Call	*IN*	*OUT*	Margin
212	WUCXFM	-17.5	-10.3	
	WBLV	-51.8	-13.4	
	WKARFM	-83.9	-66.4	
213	WKARFM	-149.2	-110.0	
214	WKARFM	-83.9	-66.4	
	990610	-19.2	-18.6	
	WNFR.C	-6.9		
	990610	-19.2	-18.6	
	WNFR	-2.1		
	WQAC	-2.4	-15.8	
	WWZP.C		-0.8	
	WOES	-16.2		
215	WKARFM		-28.2	
	AP215		-35.9	
	WQAC	-13.0	-58.6	
	WWZP.C	-9.3	-43.4	
	980814	-22.1	-37.6	
	WFUMFM	-6.0		
	WOES	-16.2		
216	WKARFM		-28.2	
	WQAC	-2.4	-15.8	
	WWZP.C		-0.8	
	WOLW	-5.0		
	WFUMFM	-54.9	-43.0	
	WOES	-25.1	-37.0	
217	WFUMFM	-6.0		
	WCSG	-23.7	-22.2	
	WCHWFM		-20.1	
	WOES	-37.7	-80.3	
	990728	-5.1	-37.6	
	AP218	-7.8	-18.1	
	990914	-12.6	-21.8	
	WMHWFM	-1.5	-7.5	
	AP218		-2.7	
218	WOES	-25.1	-37.0	
	AP218	-33.6	-60.7	
	990914	-39.2	-64.8	
	WMHWFM	-34.7	-50.3	
	990720		-13.3	
	WMHWFM	-1.2	-38.7	
	AP218	-17.4	-45.3	
	990720		-5.7	
	WUOM	-33.6	-16.9	
	WKMY	-6.7	-9.2	-8.1
219	WOES	-16.2		
	AP218	-7.8	-18.1	
	990914	-12.6	-21.8	
	WMHWFM	-1.5	-7.5	
	AP218		-2.7	
	WUOM	-100.0	-60.4	
	WKMY	-6.7	-9.2	-8.1
220	WOES	-16.2		
	WUOM	-33.6	-16.9	
	AP220	-26.4	-40.1	
	990720	-2.3	-37.4	
	AP220	-17.5	-16.9	
	AP220	-17.5	-16.9	
	WKMY	-48.9	-48.1	-49.1
	WJSZ	-21.2	-15.9	-19.9

180 degrees:

Showing of available NCE channels at Hubbardston, MI

Latitude 425057 Longitude 845032 ERP(Kw) 6.000 HAAT(m) 100 COR AMSL(m) 340

Chan	Call	*IN*	*OUT*	Margin
201	WLGH	-59.4	-67.0	
	WLGH.C	-74.3	-75.5	
	WYCE.A	-37.8	-38.3	
	WYCE	-38.0	-38.6	
	WJOM	-20.4	-13.3	
202	WLGH	-21.2	-23.9	
	WLGH.C	-33.5	-32.3	
	WAYK	-33.0	-28.8	
	WAAQ.A	-1.2	-8.3	
	WEJC.A	-55.9	-21.9	
	WEJC	-33.1	-13.1	
	WJOM	-45.0	-50.4	
203	WGVUFM	-7.2	-15.2	
	WJKQ.C		-15.9	
	WJOM	-87.7	-94.2	
204	WJOM	-45.0	-50.4	
	CIMX	-17.7	-17.6	-73.2
	AP204		-24.8	
	WIAA	-27.0		
	AP204		-0.7	
	WDBM	-24.8	-29.5	
205	WJOM	-20.4	-13.3	
	WDBM	-61.8	-72.7	
	WBLUFM	-21.3	-39.5	
	AP206		-4.6	
206	WJOM	-20.4	-13.3	
	WDBM	-24.8	-29.5	
	WIDR		-4.3	
	AP206	-26.3	-47.6	
	ALLO	-48.7	-22.0	
	WLNZ	-2.1		
	AP209	-3.4		
207	AP206		-4.6	
	WJKNFM	-17.8	-25.8	
	981224		-19.7	
	AP207	-23.5	-30.3	
	WGNB	-3.6	-15.1	
	WCMUFM	-33.6	-20.3	
	WLNZ	-2.1		
	AP209	-3.4		
208	WCMUFM	-99.8	-63.0	
	WOCR		-0.4	
	WLNZ	-12.8	-24.2	
	AP209	-15.9	-27.2	
209	WCMUFM	-33.6	-20.3	
	WOCR	-1.5	-44.2	
	AP209		-18.3	
	990920	-0.0	-36.5	
	WLNZ	-29.4	-67.4	
	WTAC		-2.6	
	AP209		-29.7	
	AP209	-1.3	-22.3	
	AP209	-35.7	-70.2	
	WAYG.C		-3.1	
210	WOCR		-0.4	
	WLNZ	-12.8	-24.2	
	AP209	-15.9	-27.2	
	CBEFM	-11.9	-12.3	-69.4
	WAYG	-33.8	-41.4	
	WAYG.C	-42.0	-45.9	
	WKDS		-3.0	
	WKARFM		-33.7	
211	WLNZ	-2.1		
	AP209	-3.4		
	WAYG.C		-3.1	
	AP211		-6.4	
	990406	-21.3	-34.4	
	AP211	-10.9	-18.4	
	WUCXFM	-34.2	-14.2	
	AP211		-30.5	
	WKARFM		-33.7	
212	WLNZ	-2.1		
	AP209	-3.4		
	WBLV	-62.5	-24.4	
	WKARFM	-90.2	-73.3	
213	WKARFM	-155.6	-116.5	
214	WKARFM	-90.2	-73.3	
	990610	-4.9	-4.8	
	WAUS	-4.8		
	990610	-4.9	-4.8	
	980814	-8.5	-17.2	
215	WKARFM		-33.7	
	AP215		-9.7	
	WQAC		-33.8	
	WWZP.C		-4.8	
	980814	-13.4	-32.9	
	980218	-5.0	-30.1	
	980814		-19.9	
	980810	-3.9	-32.3	
	980814	-49.2	-59.8	
216	WKARFM		-33.7	
	980814	-8.5	-17.2	
	AP216		-20.2	
	WFUMFM	-28.2	-16.5	
	WCSG	-13.8	-11.5	
	WOES		-7.8	
217	WCSG	-56.6	-54.6	
	WOES	-4.4	-50.6	
	990728		-5.2	
	990914	-14.2	-24.2	
218	WCSG	-13.8	-11.5	
	WOES		-7.8	
	AP218		-22.2	
	990914	-40.8	-66.9	
	WMHWFM	-12.2	-28.2	
	990720		-5.4	
	WMHWFM		-15.8	
	AP218		-7.1	
	990720		-1.0	
	WUOM	-34.3	-18.0	
	WKMY	-8.7	-8.7	-8.6
219	990914	-14.2	-24.2	
	WMCQ.A	-11.3	-13.0	
	WUOM	-100.7	-61.2	
	AP220	-9.7	-18.1	
	990720	-2.8	-15.1	
	AP220	-13.6	-12.6	
	AP220	-13.6	-12.6	
	WKMY	-8.7	-8.7	-8.6
220	WUOM	-34.3	-18.0	
	AP220	-45.4	-60.7	
	981208		-25.5	
	990720	-22.3	-57.8	
	AP220		-27.5	
	AP220	-56.3	-55.7	
	AP220	-56.3	-55.7	
	WKMY	-49.4	-49.9	-49.6

270 degrees:

Showing of available NCE channels at Hubbardston, MI

Latitude 430532 Longitude 851026 ERP(Kw) 6.000 HAAT(m) 100 COR AMSL(m) 353

Chan	Call	*IN*	*OUT*	Margin
201	WLGH	-25.0	-33.0	
	980505		-28.5	
	WPQZ.C		-4.8	
	WLGH.C	-40.6	-41.8	
	WYCE.A	-57.6	-58.6	
	WYCE	-57.9	-58.8	
	WEJC.A	-5.4		
202	WYCE.A	-9.4	-15.4	
	WYCE	-9.8	-15.6	
	WAYK	-29.8	-24.7	
	WEJC.A	-69.6	-35.1	
	WEJC	-47.0	-26.3	
	WJOM	-11.7	-19.4	
203	WEJC.A	-5.4		
	WGVUFM	-33.6	-42.5	
	WJOM	-54.2	-62.1	
204	WJOM	-11.7	-19.4	
	CIMX			-36.8
	AP204		-4.9	
	WIAA	-60.5	-19.2	
	WBLUFM	-14.1	-20.8	
205	WDBM	-26.1	-37.6	
	WBLUFM	-44.8	-64.0	
	AP206		-2.0	
206	WBLUFM	-14.1	-20.8	
	AP206	-23.9	-45.1	
	ALLO	-42.7	-15.6	
207	AP206		-2.0	
	AP207		-1.5	
	WGNB	-26.1	-36.7	
	WCMUFM	-48.0	-33.7	
208	WCMUFM	-114.1	-76.8	
	AP209	-4.1	-16.4	
209	WCMUFM	-48.0	-33.7	
	WOCR		-20.0	
	AP209		-22.5	
	990920		-3.2	
	WLNZ		-32.5	
	AP209	-2.5	-26.0	
	AP209	-23.0	-59.1	
	WAYG	-14.5	-20.6	
	WAYG.C	-18.5	-24.5	
210	AP209	-4.1	-16.4	
	CBEFM			-32.9
	WTHS		-11.3	
	WAYG	-56.5	-63.3	
	WAYG.C	-62.4	-67.7	
211	WAYG	-14.5	-20.6	
	WAYG.C	-18.5	-24.5	
	AP211		-13.7	
	990406	-8.1	-21.6	
	WUCXFM	-24.5	-4.3	
	AP211		-12.3	
	WBLV	-31.8	-17.6	
212	WBLV	-99.0	-60.5	
	WKARFM	-54.9	-39.0	
	980814	-23.1	-8.6	
213	WBLV	-31.8	-17.6	
	WKARFM	-120.2	-81.7	
	980814	-23.1	-8.6	
214	WKARFM	-54.9	-39.0	
	990610	-34.4	-33.8	
	WAUS	-6.2		
	990610	-34.4	-33.8	
	980814	-40.1	-48.1	
215	AP215		-22.1	
	WQAC		-40.6	
	980814	-0.2	-20.2	
	980218		-17.4	
	980814		-6.1	
	980810		-19.4	
	980814	-75.9	-91.4	
	990914	-9.2		
216	980814	-40.1	-48.1	
	WOLW	-33.0	-4.3	
	WFUMFM	-2.0		
	WCSG	-33.7	-31.6	
	990914	-9.2		
217	980814	-23.1	-8.6	
	WCSG	-77.4	-74.3	
	WOES		-28.4	
	990728		-11.6	
	990914	-20.6	-32.4	
	WMHWFM		-0.9	
	AP220	-20.9	-11.2	
	990720	-25.4	-9.2	
218	980814	-23.1	-8.6	
	WCSG	-33.7	-31.6	
	AP218		-14.4	
	990914	-40.2	-75.3	
	WMHWFM	-29.7	-44.0	
	990720	-19.9	-35.6	
	WMHWFM		-30.9	
	990720		-31.8	
	AP220	-20.9	-11.2	
	990720	-25.4	-9.2	
219	990914	-20.6	-32.4	
	WMHWFM		-0.9	
	WMCQ.A	-40.9	-43.1	
	WUOM	-64.9	-25.9	
	WMCQ.C	-29.5	-29.1	
	AP220	-43.8	-50.8	
	990720	-38.6	-49.8	
	AP220	-1.5	-1.8	
	AP220	-1.5	-1.8	
220	990914	-9.2		
	AP220	-80.4	-94.0	
	981208		-12.2	
	990720	-60.0	-92.8	
	AP220		-13.9	
	AP220	-44.6	-44.7	
	AP220	-44.6	-44.7	
	WKMY	-20.3	-20.7	-18.2