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Federal Communication Commission
Bureau / Office

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Amendment of Section 73.202(b),)	MB Docket No. 04-124
Table of Allotments,)	RM - 10936
FM Broadcast Stations.)	RM - 10937
(Dallas, Oregon))	RM - 10938
)	RM - 10939

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JUN 10 2004

To: Chief, Audio Division, Media Bureau

Federal Communications Commission
Office of the Secretary

COMMENTS OF RADIO BEAM, LLC

Radio Beam, LLC ("Radio Beam"), hereby opposes reservation of Channel 252C3 at Dallas, Oregon, for noncommercial educational use as proposed in the above-captioned proceeding. As we show below, the allotment does not meet the criteria prescribed by the Commission for reservation of a channel.

In *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, 15 FCC Rcd 7386 (2000), the Commission revised Section 73.202 of the Rules to provide that the proponent of an educational reservation must demonstrate (i) that it is technically precluded from using a reserved channel and (ii) that the channel, if reserved, would provide a first or second noncommercial service to at least ten per cent of the population within the 60 dBu contour of the proposed station.

A review of Channel 252C3 at Dallas reveals that, contrary to the contentions of the four petitioners, it would not meet the second criterion described above. All four proponents have ignored the presence of one noncommercial station that provides coverage to the pertinent area, and three of the four have ignored the presence of a second station.

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All four petitioners omit any discussion of KOAC(AM), Corvallis, Oregon, which is licensed to Oregon Public Broadcasting, and which is operated noncommercially as the lone AM station in the Oregon Public Broadcasting network. As shown in the attached Engineering Statement of Hatfield & Dawson, KOAC is a CPB-qualified station.

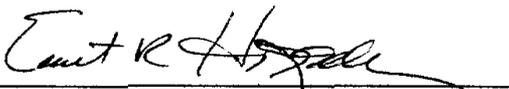
Three of the four proponents omit discussion of KLVU(FM), Sweet Home, Oregon, which is licensed to Educational Media Foundation as a noncommercial educational station (see BMLED-19970415KD).

As demonstrated in the attached Engineering Statement, when KOAC and KLVU are taken into account, the Dallas allotment would provide a first or second noncommercial service to only 0.7% of the total population within the primary contour—far less than the 10% required by the Commission. Moreover, even if KOAC is excluded from the analysis, the allotment would provide a first or second service to only 7.9% of the population, well below the required minimum.¹

Since the proposed reservation of Channel 252C3 at Dallas clearly fails to meet the criteria established by the Commission, the channel should not be reserved and the above-captioned proceeding should be terminated.

¹ One of the petitioners contends that, taking KLVU into account, the proposed allotment would provide a first or second service to 11% of the population. As noted in the attached Engineering Statement, however, that conclusion is premised on a population within the Dallas 60 dBu contour that is nearly 100,000 persons lower than the population calculated by Radio Beam and the other four proponents.

Respectfully Submitted
RADIO BEAM, LLC

By: 
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June 7, 2004

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Engineering Statement Comments in MB Docket No. 04-124

This Engineering Statement has been prepared on behalf of Radio Beam, LLC, in support of comments filed in MB Docket No. 04-124. In this proceeding, four separate petitioners have requested that the Commission reserve Channel 252C3 at Dallas, Oregon, for non-commercial use. Those petitioners are the Dallas, Oregon Seventh-Day Adventist Church ("Seventh-Day"), Lifetime Ministries, Inc. ("Lifetime Ministries"), Northwest Community Radio Project ("NCRP"), and Radio Bilingue, Inc. ("Radio Bilingue") (together, "Petitioners").

In support of their petitions, each petitioner has included an engineering showing which purports to demonstrate that the reservation proposal would provide a first and/or second NCE radio service to at least ten percent of the population within the 60 dBu contour of the proposed station. Each of the petitioners has erred by excluding certain NCE radio stations from their service analysis. A full analysis shows that the reservation of Channel 252C3 at Dallas would provide a first or second NCE radio service to only 0.7 percent of the population to be served by that station. Thus, this allotment does not qualify for reservation, and the reservation requests of the Petitioners should be denied.

Background

In the *Reexamination of the Comparative Standards for Noncommercial Educational Applicants ("NCE Report and Order")* 15 FCC Rcd 7386 (2000), the Commission established revised criteria by which a rulemaking proponent may reserve an FM allotment for NCE use. Under the expanded criteria, a proponent must demonstrate a) that it is technically precluded from using a reserved channel and b) that the proposal would provide a first and/or second NCE radio service to at least 10 percent of the population within the 60 dBu contour of the proposed station. Originally, the Commission limited this expanded reservation criteria to future allotment proceedings, but subsequently extended the expanded criteria to existing vacant FM allotments for which a Notice of Proposed Rulemaking had been released prior to August 7, 2000. See *Reexamination of the Comparative Standards for Noncommercial Educational Applicants ("NCE Second Report and Order")* 18 FCC Rcd 6691 (2003).

In establishing these new reservation criteria, the Commission drew no distinction between existing NCE stations operating on reserved non-commercial channels, reserved commercial channels, non-reserved commercial channels, or even AM frequencies.

[A]n NCE entity can show that the need for an NCE station is greater than the need for a commercial station. . . by showing that. . .

(B) the NCE proponent would provide a first or second radio or television NCE service to 10% of the population within the proposed allocation's 60 dBu (1 mV/m) service contour (radio) or Grade B contour (TV). New NCE service to fewer than 2,000 people would be considered insignificant for purposes of this determination.

NCE Report and Order at 114.

The *NCE Report and Order* goes on in Paragraph 115 to note that "No AM stations are reserved for NCE use." It should be noted, however, that this statement is made in the context of a determination that the new NCE reservation procedure will not be applied to the reservation of AM channels for NCE use. Therefore, this statement does not contradict the fact that there are numerous AM stations which are operated as NCE stations, and which should therefore be considered in any evaluation of first and second NCE service.

Nor does Paragraph 114 limit the first and second NCE service evaluation to "incoming" NCE FM 60 dBu service contours. The only reference to the 60 dBu service contour is for the FM allocation which is under consideration for reservation. Evaluation is to be made with respect to stations which already provide "NCE service" to the area in question. Therefore, it is appropriate to include in this evaluation any AM stations in the area which are operated as NCE stations, and which provide NCE service to the proposed allocation's 60 dBu service contour.

The resulting rule in Section 73.202 reads in pertinent part:

An entity that would be eligible to operate a noncommercial educational broadcast station can, in conjunction with an initial petition for rulemaking filed pursuant to Part 1, Subpart C of the Commission's rules, request that a nonreserved FM channel. . .be allotted as reserved only for noncommercial educational broadcasting by demonstrating. . .the applicant is technically precluded from using the reserved band by existing stations or previously filed applications and the proposed station would provide a first or second noncommercial educational radio service to 2,000 or more people who constitute 10% of the population within the proposed allocation's 60 dBu service contour.

Again, no distinction is drawn which would imply that any full-service NCE station should be excluded from the analysis, including those operating on reserved commercial channels, on non-reserved commercial channels, or on AM frequencies.

Summary of Petitioners' Evaluations

The following table summarizes the population figures included in the Petitioners' first and second NCE service analyses, along with the population figures which have been calculated by this firm.

	Full Correct Analysis	Seventh Day	Lifetime Ministries	NCRP	Radio Bilingue
Dallas 60 dBu Pop	507,317	505,405	507,267	414,823	507,265
1 st /2 nd NCE Service to	3,678 0.7%	135,709 26.9%	179,865 35.5%	45,567 11%	148,736 29.3%

All four Petitioners have greatly exaggerated the extent of first and/or second NCE service which would be provided by reservation of Channel 252C3 at Dallas. A close review of the engineering showings included in the Petitioners' filings reveals that:

Seventh Day has ignored the presence of NCE stations KOAC-AM and KLVU-FM, and has depicted an expanded service area for KAJC-FM corresponding to an ungranted application.

Lifetime Ministries has ignored the presence of NCE stations KOAC-AM and KLVU-FM.

NCRP has ignored the presence of NCE station KOAC-AM.

Radio Bilingue has ignored the presence of NCE stations KOAC-AM and KLVU-FM.

NCE Status of KOAC-AM

AM station KOAC operates on 550 kHz at Corvallis, Oregon. The station is owned by Oregon Public Broadcasting, which operates it non-commercially as the lone AM station in the Oregon Public Broadcasting network. All other radio stations in the network are FM stations operating on channels in the reserved NCE band. KOAC is a CPB-qualified AM station. Attached is a recent Corporation for Public Broadcasting ("CPB") Request for Proposal which includes a list of all 59 CPB-qualified AM stations.

NCE Status of KLVU-FM

FM station KLVU operates on Channel 296C1 at Sweet Home, Oregon. The station is owned by Educational Media Foundation ("EMF"), which purchased the station in 1997 and at the same time converted it to non-commercial operation via application BMLD-19970415KD. KLVU-FM operates with EMF's non-commercial religious "K-Love" format. The current license file number is BLED-19980403KB, indicating NCE status.

First and Second NCE Service Evaluation

A full and complete first and second NCE service evaluation has been performed for Channel 252C3 at Dallas, including consideration of the NCE service provided by KOAC-AM and KLVU-FM. Low Power FM stations have not been included in this study, since while those stations are operated as NCE facilities, they are operated on a secondary basis and are subject to displacement by new full-power operations.

The following stations have been found to provide NCE service to the 60 dBu service area of Channel 253C3 at Dallas:

KOAC-AM	550 kHz	Corvallis
KGRI-FM	201C3	Lebanon
KBVM-FM	202C2	Portland
KBVR-FM	204A	Corvallis
KMHD-FM	206C1	Gresham
KLCC-FM	209C	Eugene
KBPS-FM	210C2	Portland
KAJC-FM	211A	Salem
KSLC-FM	212A	McMinnville
KWBX-FM	212A	Salem
KLCO-FM	213C3	Newport
KBOO-FM	214C1	Portland
KWAX-FM	216C1	Eugene
KOPB-FM	218CØ	Portland
KLVU-FM	296C1	Sweet Home

The attached map exhibit depicts the service contours of these NCE stations, with the exclusion of those which do not define the boundaries of the areas of first or second NCE service within the Dallas Channel 252C3 service area.

It should be noted that KOAC-AM has a very low nighttime interference-free signal level of 1.8 mV/m. The nighttime 1.8 mV/m contour would encompass the entirety of the Dallas Channel 252C3 60 dBu service area, as would the daytime 0.5 mV/m contour. For the sake of a conservative analysis, the protected nighttime 2 mV/m contour of KOAC-AM has been used in this evaluation. (It is noted that this contour, like the nighttime interference-free contour, encompasses the entirety of the Dallas Channel 252C3 60 dBu service area.)

The population results of this evaluation are summarized in the table above, but bear repeating. The Dallas Channel 252C3 allotment would provide service to 507,317 persons within the 60 dBu contour. Of these, only 3,678 persons would receive their first or second NCE radio service. This is just 0.7% of the total service population of the Dallas Channel 252C3 allotment.

Even if the Commission were to determine, contrary to the demonstration above, that non-commercial AM stations such as KOAC-AM should be excluded from the NCE service analysis, our study finds that the Dallas Channel 252C3 allotment would provide a first or second NCE service to only 40,091 persons, or 7.9% of the total service population of the allotment. (This analysis includes non-commercial KLVU-FM.)¹

Therefore, on the basis of the first and second NCE service test, the Channel 252C3 allotment at Dallas is not eligible for NCE reservation.

Conclusion

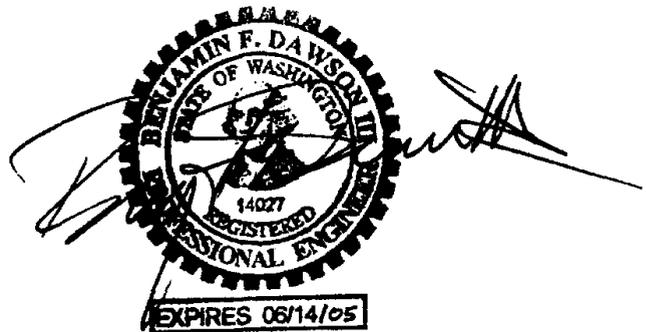
The Petitioners, in their requests to have Channel 252C3 at Dallas reserved for NCE use, have submitted flawed evaluations of the first and second NCE service which that reservation would provide. A correct and full evaluation, taking into consideration the presence of non-commercial stations KOAC-AM and KLVU-FM, reveals that the reservation of Channel 252C3 at Dallas would provide a first and/or second NCE radio service to only 0.7% of the total service population of the allotment. Therefore, the NCE reservation requests in MB Docket No. 04-124 by Seventh Day, Lifetime Ministries, NCRP, and Radio Bilingue must be denied.

I hereby declare that the facts set out in the foregoing Engineering Statement, except those of which official notice may be taken, are true and correct.

Signed this 3rd day of June, 2004.

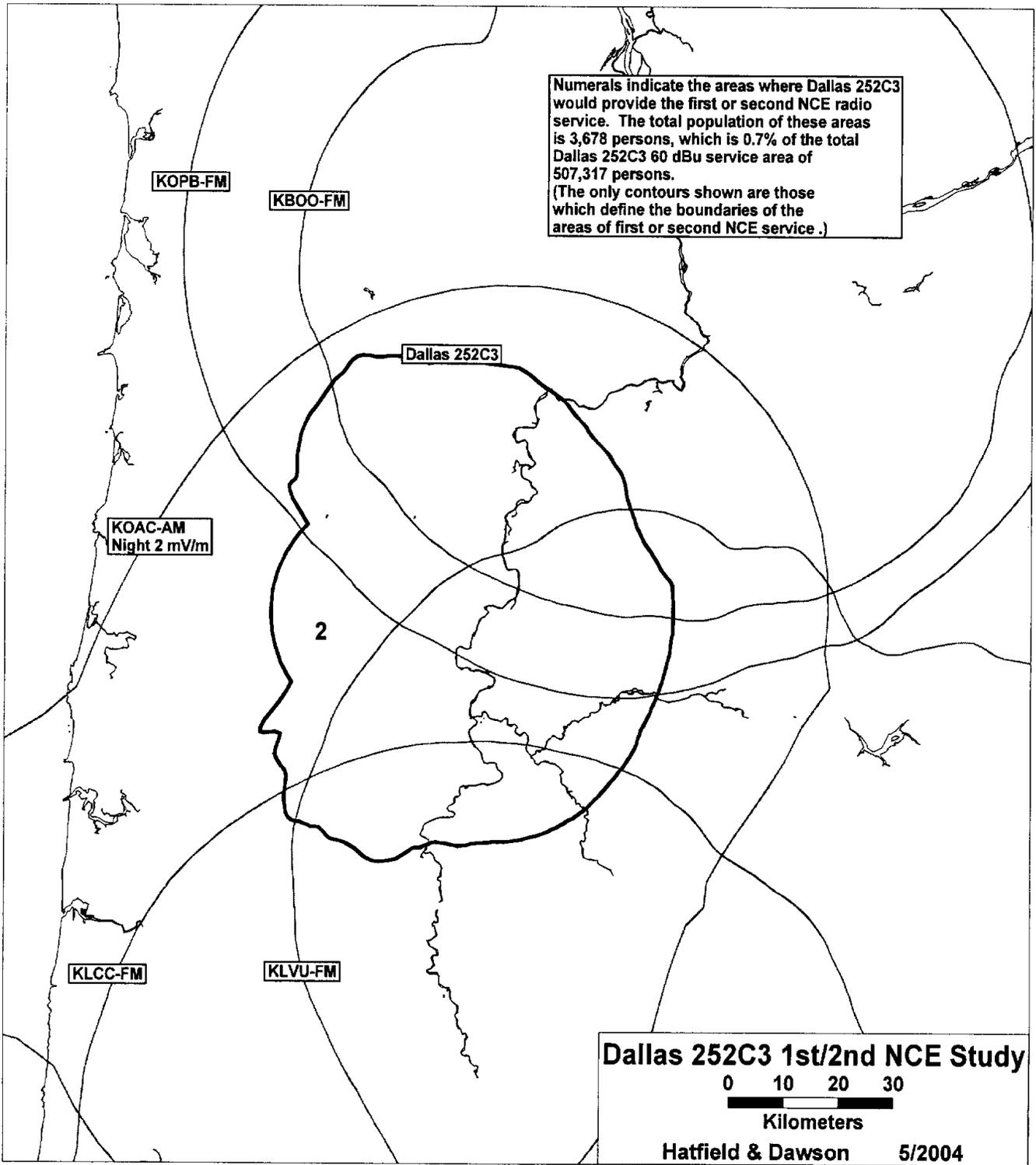


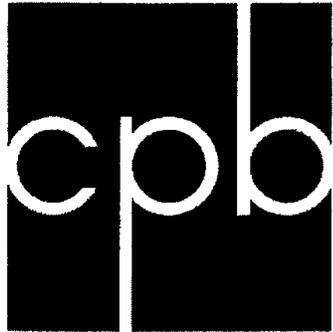
Erik C. Swanson



Benjamin F. Dawson III, P.E.

¹It is noted that NCRP provided an analysis which included KLVU but excluded KOAC, and that NCRP concluded that 11% of the Dallas Channel 252C3 service population would receive a first and/or second NCE radio service. However, NCRP arrived at a Dallas Channel 252C3 60 dBu service population which is nearly 100,000 persons lower than that calculated by the other proponents and by this firm.





**Corporation for Public Broadcasting
Request for Proposal**

AM IBOC Ascertainment Project

Deadline: March 12, 2004

Request for Proposal
Corporation for Public Broadcasting
AM IBOC Ascertainment Project

Introduction

The Corporation for Public Broadcasting is hereby announcing a Request for Proposal for research that will provide a knowledge base for public radio AM stations as they approach the conversion to digital IBOC. There are limitations to current industry information regarding the types of AM stations tested (re: tower array, directionality, diplexed station, etc.) within the public radio system. Since the industry tests did not look at the variety of AM transmission configurations, there is a possibility that, on a system wide basis, implementation could be more costly than anticipated. The proposal submission deadline is March 12, 2004. Follow-up phone interviews will be scheduled in mid-March if necessary.

Project Objectives

The AM IBOC (HD Radio) Ascertainment Project has several related objectives:

1. To determine if AM IBOC can be successfully added to each participating AM public radio station
2. To provide information that will optimize the performance of the AM station in a way that will not only make IBOC sound its best but that will also improve the quality of the station's analog transmissions
3. To identify problem installations where weak ground systems and inadequacies in directional arrays cause limitations in bandwidth needed for successful IBOC transmission
4. To provide suggestive remedies and cost estimates that can be employed at public radio stations to facilitate their conversion to IBOC

Project Overview

After reviewing the technical plant configurations of the 59 CPB qualified AM public radio stations¹ (three of which have already been funded for IBOC conversion through the CPB seed market program), it became apparent that there are a variety of stations, having various configurations, operating on frequencies as low as 640 kHz and as high as 1550 kHz. There are:

- Ten directional stations have more than a single tower;
- Seventeen stations share antenna space with other stations;
- Eighteen stations have buried ground systems older than 20 years;
- Nine stations have ground systems 30 years or older, and;
- Seventeen stations operate with different daytime and nighttime powers.

¹ Station list attached.

We are requesting proposals from qualified consulting engineering firms with an extensive background in AM field work testing and installation. CPB intends that the firm selected will provide an engineer to travel to the transmitter sites of the identified stations and examine the physical and electrical conditions of the antennas and transmitting systems.

Project Deliverables

We expect the project deliverables to be:

1. AM Station physical inspection
2. A report for each station that will include:
 - a. list recommendations for plant improvement leading to the addition of the iBiquity IBOC transmission capability
 - b. carefully estimated "readiness" costs for each station's conversion
 - c. fully document IBOC implementation pertinent aspects of the station's transmitting plant
3. A final report that will summarize the findings for all participating AM stations, identify problem stations, and recommend solutions and estimates costs

Physical Inspection

CPB intends to have the selected firm examine and report the condition of the ground system by ascertaining its age and inspecting individual radials where possible. Feed points, tuning circuits, transmission lines and base insulators should be examined for mechanical and electrical integrity.

Electrical System Measurements

CPB intends to have the selected firm ascertain and report the following information:

A calibrated network Analyzer shall be employed to measure the symmetry of the sideband impedances (Hermitian symmetry) ± 5 kHz of the carrier. A Smith chart(s) will be drawn for each installation and the chart(s) will display the impedance symmetry. The VSWR of the load impedance will be measured at ± 5 , ± 10 kHz and ± 15 kHz from the carrier center frequency and shall include the carrier frequency. Calculations will be made for both day and night systems. If a DA system is in use, the ratios and the phases of the individual in tower currents will be measured using a network analyzer at 5 kHz increments out to ± 15 kHz.

Recommendations: Based on the need to achieve the iBiquity system "desired characteristics" for antenna systems transmitting IBOC, CPB intends to have the selected firm make recommendations at each site for improvements that will lead to a transmitting system capable of transmitting IBOC at the highest quality possible.

Recommendations for the following are expected:

- Transmitter replacements when required;
- Changes or improvements to the ground system if deemed necessary;

- Method of improving antenna system bandwidth if necessary;
- Circuit characteristics that should be adopted within phase rotation networks to improve the symmetry of the sideband load impedances at the transmitter's final amplifier;
- Replacing filters in duplex situations, if required to increase bandwidth
- Corrections for problems in DA installations should be identified and;
- Other areas worth noting.

Number of Stations: While there are 59 stations in the group, not all stations may chose to participate. CPB intends to invite each station in the group to participate; whether they accept, depends entirely on the individual station. Consequently, CPB cannot, at this time, provide a final count of the ultimate number of stations that will be involved. We can, however, anticipate that the majority of the 59 AM stations qualifying for this program will participate. Therefore, the successful firm shall bid this project on a cost per station basis and on a cost per group basis. Group quotes should be based on 30, 40, 45, 50, 55 and 59 stations participating. (*See attached list of qualifying stations.*)

Project Timeline: We anticipate that this project will have a six month timeline, with a projected start date in April 2004.

Delivery of reports: CPB plans to have the successful bidder provide CPB with individual station reports for each station studied and a copy of individual station reports to the applicable AM station studied. In addition, CPB plans to have the successful bidder prepare a final report that summarizes the individual station reports.

Submission of Proposals:

Proposals must be submitted to the Administrative Contact listed below.

The following information should be included in your formal proposal:

- ◆ Detailed approach for answering aforementioned questions – methodology, deliverables, time frame, estimated cost (or cost ranges)
- ◆ Résumés of researchers/consultants likely to be involved.
- ◆ References of 3 recent clients.

CPB is not responsible for loss or damage to the material submitted, or for any unauthorized use or misuse of the submitted materials by any third party. Any submission to CPB shall become the property of CPB (not including any intellectual property rights contained in such submission), and CPB is not required to return any submitted materials to any applicant.

Solicitation by CPB of proposals does not constitute an agreement by CPB to extend funding to any party for the project under consideration. CPB may, in its sole discretion, elect not to pursue this project in any manner.

By submitting a proposal, each applicant grants to CPB the right to duplicate, use, disclose, and distribute all of the materials submitted for purposes of evaluation, review, and research. In addition, each applicant guarantees that the applicant has full and complete rights to all of the information and materials included in the proposal. Each applicant also guarantees that all such materials are not defamatory and do not infringe upon or violate the privacy rights, copyrights, or other proprietary rights of any third party.

Conditions of Agreement

If a proposal is selected for funding, applicants will be required to sign a binding agreement. Until both parties have signed an agreement, no express or implied commitment has been made to provide financial support. Applicants are not authorized to commence work until the agreement is fully executed. If applicants opt to commence work, they do so at their own risk. No oral or written statement other than the signed, written agreement will govern or modify the relationship.

As a condition of agreement, applicants must guarantee that, among other things, any work they undertake on behalf of CPB is not defamatory and will not violate or infringe upon the privacy rights, copyrights, or other proprietary rights of any third party. Contractors must also agree to indemnify CPB against any loss resulting from breach of any of the guarantees contained in the agreement.

Those receiving funds from CPB must be able to comply with a number of requirements that will be included in the operative agreement. These requirements include but are not limited to:

- (1) A demonstration of adequate financial support to complete the work for which they have been contracted and to deliver reports and/or other intellectual property created pursuant to the Agreement;
- (2) Maintenance, for three years following receipt of relevant funds, of all financial records to the project, which records shall be accessible to CPB, and to the U.S. Comptroller General or other representatives for examination and audit purposes; *(Contractors will additionally ensure that any subcontractors or consultants under the agreement shall also maintain such records for the period specified and under the same terms);*
- (3) Maintenance, for three years after approval of a final financial report, of a complete file of all subcontracts and other agreements, licenses, clearances, and other documents related to the work undertaken, copies of which shall be made available to CPB on request;
- (4) Submission to CPB of a copy of any U.S. Comptroller General final audit report in connection with the project;
- (5) Compliance with equal employment opportunity and nondiscrimination laws and policies;
- (6) Applicants who plan to engage sub-contractors will be expected to obtain competitive bids, and to provide assurances that the prices obtained for any such services are fair and reasonable;

- (7) Applicants will be required to provide documentation as to actual costs, and provide supporting detail demonstrating that all costs are reasonable, necessary and allocable to the requirements and objectives of the work undertaken; and
- (8) All research and materials created, developed, compiled or produced pursuant to or as a result of this project (including but not limited to all reports) will be considered ordered and commissioned by CPB as works made for hire under the copyright laws, and made in the course of services rendered. If, for any reason, the proposed research and materials to be provided are not considered works made for hire under the copyright laws, then the applicant will be required to assign all right, title and interest in and to such research and materials to CPB. Applicants further agree that neither they, nor any of their subcontractors, will have any copyrights whatsoever in any research and/or materials created, developed, compiled or produced by them or by any subcontractor, or by any third party participating in the preparation of research or materials for this project.

Other material terms and provisions will be set forth in the documents provided to that successfully completes the selection process.

Proposed Project Timeline

February 20: RFP announced

March 12: Proposals due

By April 5: Consultants hired

April 5 -May 30: Work conducted (estimate – please include your own time estimate)

Point of Contact:

Technical questions:

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Administrative questions:

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Call	City of License	State	Freq	Power		Directional	Tower		Number of Towers	Tower Height Degrees	Tower Age	S
				Day	Night		Series	Unipole				
KYUK-AM	Bethel	AK	640	10 kw	10 kw	Non		X	1	58.99	27	
KDLG-AM	Dillingham	AK	670	10 kw	10 kw	Non	X		1	85.77	15	
KBRW-AM	Barrow	AK	680	10 kw	10 kw	Non	X		1	99.49	10	
KOTZ-AM	Kotzebue	AK	720	10 kw	10 kw	Non	X		1	86.90	1	
KSDP-AM	Sand Point	AK	830									
KSKO-AM	McGrath	AK	870	10 kw	10 kw	Non		X	1	79.55	15	
KBBI-AM	Homer	AK	890	10 kw	10 kw	Non		X	1	90.46	10	
KZPA-AM	Fort Yukon	AK	900	5 kw	5 kw	Non	X		1	54.97	10	
KIYU-AM	Galena	AK	910	5 kw	5 kw	Non	X		1	66.57	17	
KNSA-AM	Unalakleet	AK	930	4 kw	4 kw	Non	X		1	104.77	19	
KIAL-AM	Unalaska	AK	1450									
KCHU-AM	Valdez	AK	770	10 kw	10 kw	Non	X		1	70.41		
KUAZ-AM	Tucson	AZ	1550	50 kw	-	Non	X		1	215.43	25	
KAWC-AM	Yuma	AZ	1320									
KMJC-AM	Mt. Shasta	CA	620	1 kw	0.029	Non	X		1	63.45	20	
KTBR-AM	Mendocino	CA	1300	5 kw	0.077	Non	X		1	95.04	20	
KSYC-AM	Yreka	CA	1490	1 kw	1 kw	Non	X		1	100.81	20	
KSNA-AM	Redding	CA	1330	1 kw	1 kw	Non	X		2	139.81	New	
KKPC-AM	Pueblo	CO	1230	1 kw	1 kw	Non	X		1	90	15	
KCFR-AM	Denver	CO	1340	1 kw	1 kw	Non	X		1	191.3	45	
KCFC-AM	Boulder	CO	1490	1 kw	1kw	Non	X		1	76.3		
WMMM-AM	Westport	CN	1260									
WKGC-AM	Panama City Beach	FL	1480									
KIFO-AM	Pearl City	HI	1380									
KBSU-AM	Boise	ID	730	15 kw	500 w	DA-2	X		3	104.3	40+	
WILL-AM	Champaign/Urbana	IL	580	5 kw	100	Non	X		2	68.8	35	
WBAA-AM	West Lafayette	IN	920	5 kw	1 kw	DA-N	X		3	84.8	20	
WOI-AM	Ames	IA	640	5 kw	1 kw	DA-N	X		2	134 & 85.3	54 & 17	
WSUI-AM	Iowa City	IA	910	5 kw	4 kw	DA-N	X		3	99.85	1	
KRNI-AM	Mason City	IA	1010	1 kw	16 w	Non	X		1	147.77	40	
KKSU-AM	Manhattan	KS	580									
WFPB-AM	Orleans	LA	1170	717	N/A	Null@308E		X	2	212.5&145.5	21&40+	
WBUR-AM	West Yarmouth	MA	1240									
WKAR-AM	East Lansing	MI	870									
WGVU-AM	Grand Rapids	MI	1480									
KUOM-AM	Minneapolis	MN	770	5 kw	N/A	Non		X	1	90.00	29	
KABR-AM	Magdalena	NM	1500									
WNYC-AM	New York	NY	820									
WNED-AM	Buffalo	NY	970	5 kw	5kw	DA-1	X		5 Inline	84	60	
WXXI-AM	Rochester	NY	1370									
KUND-AM	Grand Forks	ND	1370									
WOSU-AM	Columbus	OH	820	5 kw	790 w	Parallogrm	X		6	101&90	65&14	
WOUB-AM	Athens	OH	1340	0.5	1	Non		X	1	73.6	7	
KOAC-AM	Corvallis	OR	550	5 kw	5kw		Shunt		2	65.4	61	
KAGI-AM	Grant Pass	OR	930	5 kw	0.123	Non	X		1	13.02	20+	
KSJK-AM	Ashland/Talent	OR	1230	1 kw	1 kw	Non	X		1	139.47	35+	
KRVM-AM	Eugene	OR	1280	5 kw	1.62 kw	Yes	X		3	172,92,173	20+	
KBPS-AM	Portland	OR	1450									
KPMC-AM	Roseburg	OR	950	1 kw	0.03	Non	X		1	90	20	
WPSE-AM	Erie	PN	1450									
WIPR-AM	Hato Rey	PR	940									
WXNI-AM	Westerly	RI	1230									
WRNI-AM	Providence	RI	1290									
KUTK-AM	Knoxville	TN	850									
WWVT-AM	Christianburg	VA	1260	2.8	No	Non	X		1	90	7	
KWSU-AM	Pullman	WA	1250									
WVMR-AM	Dunmore	WV	1370									
W	KLBL-AM	Auburndale	WI	930								
	WHA-AM	Madison	WI	970	4 kw	434	Non	X		95.1	30	

CERTIFICATE OF SERVICE

I, Earnest R. Hopseker, hereby certify that on June 7, 2004, I caused a copy of the foregoing Comments of Radio Beam, LLC to be mailed via first-class postage prepaid mail to the following:

Betty McArdle, Vice-President/Treasurer
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Earnest R. Hopseker