

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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Federal Communications Commission
Office of Secretary

In the Matter of)	
)	
Amendment of Section 73.202(b),)	
Table of Allotments,)	MM Docket No. 04-239
FM Broadcast Stations.)	RM-10998
(Portage and Stoughton, Wisconsin))	
)	

To: Commission's Secretary, Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

COMMENTS IN OPPOSITION TO NOTICE OF PROPOSED RULE MAKING

Mid-West Management, Inc. ("Mid-West"),¹ by its counsel hereby submits its Comments in opposition to the above-referenced Notice of Proposed Rule Making ("NPRM").² By this NPRM, and at the request of Magnum Communications, Inc. ("Magnum"), licensee of WBKY(FM), Portage, Wisconsin, the Commission has proposed to reallocate Channel 240A (WBKY's operating channel) from Portage, Wisconsin to Stoughton, Wisconsin. Magnum's Petition for Rule Making ("Petition"), however, is deficient in several significant regards and the proposed reallocation of Channel 240A is contrary to the public interest. The proposed

¹ Mid-West is the licensee of the following radio stations: WTUX(AM), WMGN(FM) and WLMV(AM), Madison, Wisconsin, WJJO(FM), Watertown, Wisconsin, WWQM-FM, Middleton, Wisconsin, WTDY(AM), Madison, Wisconsin, an expanded band facility paired with WLMV(AM), WHIT-FM, DeForest, Wisconsin and permittee of 971030ML, Mount Horeb, Wisconsin.

² In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Portage and Stoughton, Wisconsin), Notice of Proposed Rule Making, MB Docket No. 04-239, RM-10998 (rel. June 28, 2004).

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reallotment would create a significant underserved area and remove one of the few remaining local services from the community of Portage. Furthermore, the proposal constitutes a thinly veiled manipulation of the Commission's change of community policies in an attempt to enable WBKY(FM) to migrate from rural Portage to the much larger, and already well-served, Madison Urbanized Area. Accordingly, Mid-West urges the Commission to reject this proposed change to the FM Table of Allotments.

DISCUSSION

I. The Proposed Reallotment Fails to Meet the Commission's FM Allotment Priorities, as it Would Create a Substantial Gray Area

As shown below, the proposed reallotment of WBKY(FM) to Stoughton does not comply with Commission policies concerning the allotment of FM Channels to communities, or with Section 307(b) of the Communications Act of 1934, as amended.³ The Commission's allotment priorities, promulgated under Section 307(b), are as follows: (1) first full-time aural reception service; (2) second full-time aural reception service; (3) first local aural transmission service; and (4) other public interest factors. Co-equal weight is given to priorities (2) and (3). *Revision of FM Assignment Policies and Procedures*, 90 FCC Rcd 2d 88 (1982).

While Magnum asserts that the proposed relocation would bring a first local transmission service to Stoughton, it neglects to address the fact that the relocation of WBKY(FM) would result in the creation of a substantial gray area, leaving thousands of underserved listeners its wake. As demonstrated by the attached engineering analysis prepared on behalf of Mid-West by Carl E. Smith Consulting Engineers, the proposed relocation of WBKY(FM) would leave nearly

³ 47 U.S.C. § 307(b).

2,400 people with only one full time aural service.⁴ See Exhibit A. The Petition fails to acknowledge this creation of a gray area, but rather asserts that “[a]ny loss area will continue to be amply service at the very least by the remaining stations authorized to Portage, Wisconsin and the surrounding environs.”⁵ In fact, this unsupported, sweeping statement is patently false, as demonstrated by significant loss area detailed in the attached engineering. The NPRM also errs in this regard, as the Bureau’s independent analysis fails to determine that a gray area would be created by this proposal.⁶

Consistent with the Commission’s FM allotment priorities, the creation – or in this case the preservation – of second full-time aural service is afforded the second highest priority. The relocation of WBKY(FM) approximately 45 miles to the Southeast is contrary to this priority, as it would create a new area of people whose service would be reduced from two aural reception services to one. As the Commission has found previously, the public has a legitimate expectation that existing service will continue, and this expectation is a factor that must be weighed independently against the service benefits that may result from reallocating of a channel from one community to another.⁷ Several thousand listeners have come to rely on this station as its only competitive local broadcast service, and Magnum proposes to remove that service. The public interest does not favor the removal of existing service from listeners, especially where it is their only competitive service, and any service area gains would be in areas already receiving a

⁴ In addition, as noted in the attached engineering exhibit, a large number of persons presently receiving service from WBKY would be left with less than five full time aural services as a result of the proposed reallocation. See Exhibit A.

⁵ Petition at 4.

⁶ See NPRM at ¶ 3.

⁷ See, e.g., Fairfield and Norwood Ohio, 7 FCC Rcd 2377 (MMB 1992).

plethora of other broadcast signals.⁸ This significant loss of service renders Magnum's Petition defective and renders its proposal contrary to the public interest, and thus the proposal must be rejected.

II. **Stoughton Is Located Almost Entirely Within the Madison Urbanized Area, Yet the Petition Fails to Provide the Requisite *Tuck* Showing**

As demonstrated by the attached engineering exhibit, based on the 2000 Census data, nearly 100% of Stoughton's population is located within the Madison Urbanized Area. *See Exhibit A.* Where, as here, a petitioner is seeking to change the community of license of a station and claims that it will provide a first local service to a community within an Urbanized Area, the Commission must evaluate the proposed community of license under the so-called *Huntington* and *Tuck* criteria to determine whether the community should be credited with the services from the entire Urbanized Area, or whether it should be given a local service preference.⁹ Pursuant to those criteria, the Commission examines (a) signal population coverage; that is, the degree to which the proposed station could provide service not only to the suburban community, but also to the adjacent metropolis; (b) the size and proximity of the suburban community relative to the adjacent city and whether the suburban community is within the Urbanized Area of the city; and (c) the interdependence of the suburban community with the central city.¹⁰ Further, the Commission has often stated that it will not blindly apply the first

⁸ See the more detailed discussion in Section III, *infra*.

⁹ *See Huntington Broadcasting Co. v. FCC*, 192 F.2d 33 (D.C. Cir. 1951); *Faye & Richard Tuck*, 3 FCC Rcd 5374 (1988).

¹⁰ *See Tuck*, 3 FCC Rcd 3574 at ¶¶ 26, 28. *Tuck* sets forth the following criteria to be considered in determining whether a community for which a Section 307(b) preference is sought is truly independent of a larger, nearby community: the extent to which community residents work in the larger metropolitan area, rather than the specified community; whether the smaller community has its own newspaper or other media that covers the community's local needs and interests; whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; whether the specified community

Footnote continued on next page

local service preference when a party seeks to move from a rural to a suburban community in or near an Urbanized Area.¹¹

Despite the fact that Stoughton is located within the Madison Urbanized Area, the Petition fails to include the required *Tuck* showing, and indeed it is unclear whether such a showing could be made.¹² Instead, the Petition merely states that “Stoughton, Wisconsin exhibits a substantial number of community indicia that the Commission has used in the past in determining whether a community deserves to have its own local service.”¹³ While the Petition notes that Stoughton is incorporated and has a population of 12,354, it makes absolutely no showing that Stoughton is truly independent from the Madison Urbanized Area or that it is deserving of its own local transmission service. While the NPRM asserts that a *Tuck* showing is not required because the proposed WBKY(FM) facility will cover only 9% of the Madison, Wisconsin Urbanized Area with a 70 dBu contour,¹⁴ the NPRM fails to recognize the fact that

Footnote continued from previous page

has its own local government and elected officials; whether the smaller community has its own telephone book provided by the local telephone company or zip code; whether the community has its own commercial establishments, health facilities and transportation systems; the extent to which the specified community and the central city are part of the same advertising market; and the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools and libraries.

¹¹ See, e.g., Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Arlington, et al.), Report and Order, 19 FCC Rcd 9689(Audio Div. 2004); Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Ashland, et al.), Report and Order, 19 FCC Rcd 6943 (Audio Div. 2004).

¹² The Commission has repeatedly found that in determining the degree of interdependence between communities in 307(b) proceedings that the close proximity of a suburban community to the Urbanized Area of a larger one creates an inference of interdependence. See RKO General Inc., 5 FCC Rcd 3222, 3223-24 (1990).

¹³ Petition at 4 (citations omitted).

¹⁴ NPRM at ¶ 3.

Stoughton is located almost entirely within the Madison, Wisconsin Urbanized Area, and that, consequently, a *Tuck* showing is required under the Commission's Rules.¹⁵

Moreover, the NPRM erroneously ascribes the conclusion that the proposed facility will cover only 9% of the Madison, Wisconsin Urbanized Area with a 70 dBu contour to the Petition, but in fact Magnum's Petition for Rule Making makes absolutely no reference to Madison, Wisconsin or to Stoughton's proximity to the Madison Urbanized Area. At best, Magnum's utter failure to even acknowledge that approximately 97.5% of the land area and over 99% of the population of Stoughton is located within the Madison Urbanized Area is a fatal oversight. At worst, it is a blatant attempt to bury the issue in hopes that the Commission would never require a *Tuck* showing. By ignoring the significant issues raised by the proposed relocation of WBKY(FM) to the Madison Urbanized Area, Magnum has given the Commission the false impression that Stoughton is an independent community and that it is not within an urban area. Be it an oversight or a calculated move, Magnum's Petition is patently defective and its proposal must be rejected.

III. The Proposed Relocation of Channel 240A to Stoughton, Wisconsin is Contrary to the Public Interest

In adopting its rules permitting FM stations to change their communities of license, the Commission stated that it would not permit the manipulation of its allotment criteria by granting a Section 307(b) first local service preference in situations where, as here, such a preference is sought for an urban community that is interdependent with and part of a larger metropolitan

¹⁵ Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Gonzales, Houma, and Westwego, Louisiana and Hattiesburg, Mississippi), Report and Order, 17 FCC Rcd 18113 (Audio Div. 2002) (citing Huntington Broadcasting Co. v FCC, 192 F.2d 33 (D.C. Cir 1951), RKO General, Inc., 5 FCC Rcd 3222 (1990), and Faye and Richard Tuck, 3 FCC Rcd 5374 (1988)).

area.¹⁶ Yet that is precisely what Magnum proposes to do in the instant situation by seeking to move WBKY(FM) to Stoughton, located in the Madison Urbanized Area. As demonstrated by the attached engineering exhibit, the Madison Urbanized Area is already well-served by existing radio stations. In fact, Madison is so well-served that presently no portion of the proposed gain area that would result from the relocation of WBKY(FM) receives fewer than nine full time aural services. See Exhibit A. In contrast, Magnum's proposal would remove one of only two FM stations licensed to the community of Portage. While the removal of WBKY(FM) from Portage would drastically reduce the broadcast programming responsive to the Portage community's needs and interests, the addition of the station to Stoughton would have a minimal impact on that community, which, despite the fact that it has no local transmission service, is more than adequately served by stations licensed to the Madison Urbanized Area.

The Commission will carefully review any changes to existing stations that would result in the loss of service upon which the public has come to rely.¹⁷ The Commission has long held that "any loss of service is prima facie inconsistent with the public interest and can only be justified by offsetting public interest benefits."¹⁸ Moreover, it has found that "[a] gain in service

¹⁶ See Modification of FM and TV Authorizations, 5 FCC Rcd 7094, 7096 (1990).

¹⁷ In the past, the Commission has denied a request for waiver of its rules based on the fact that the proposal would have resulted in the loss of service to an existing group of listeners, despite the fact that there would have been a gain new listeners. See Educational Information Corporation, 13 FCC Rcd 23746 (1998). Similarly, the courts have previously held that the Commission must make a determination as to whether the loss of existing service resulting from the relocation of a transmitter site is in the public interest, rather than simply performing a simplistic gain/loss analysis. See Hall v. FCC, 237 F.2d 567 (D.C. Cir. 1956) (remanding decision to FCC for determination as to whether the loss of service resulting from the relocation of a television station's transmitter site was justified under the public interest standard); Television Corp. of Michigan, Inc., 294 F.2d 730 (D.C. Cir. 1961) (noting that television and radio stations must serve the public interest, not simply maximize their revenue, and remanding to FCC for determination as to whether the loss of service resulting from the relocation of a station's transmitter site was in the public interest).

¹⁸ Educational Information Corporation, 13 FCC Rcd 23746 at ¶ 6 (1998) citing Hall v. FCC, 237 F.2d 567 (D.C. Cir. 1956)).

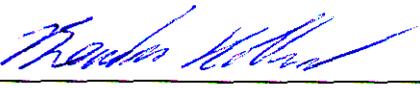
in one area will not necessarily offset a loss elsewhere.”¹⁹ Magnum’s attempt to remove a local service from a rural area to migrate to a larger, well-served urban area is contrary to the Commission’s stated policies, and the public interest is better served by preserving the allocation of Channel 240A at Portage.

CONCLUSION

As demonstrated above, Magnum’s Petition is deficient in several significant regards. Regardless of this fact, however, the proposed reallocation of Channel 240A from Portage to Stoughton, Wisconsin is not in the public interest as it would create a significant underserved area. Perhaps more importantly, the proposal would also deprive Portage of one of its only local transmission services in order to migrate the station 45 miles away to the well-served Madison Urbanized Area. Accordingly, the Commission must reject Magnum’s proposal to relocate FM Channel 240A from Portage to Stoughton, Wisconsin.

Respectfully submitted,

Mid-West Management, Inc.

By: 

David D. Oxenford
Brendan Holland

Its Attorneys

Shaw Pittman LLP
2300 N Street, NW
Washington, DC 20037
(202) 663-8000

Date: August 19, 2004

¹⁹ Id. citing Television Corp. of Michigan, Inc., 294 F.2d 730 (D.C. Cir. 1961).

EXHIBIT A

ENGINEERING STATEMENT IN
SUPPORT OF COMMENTS
MB DOCKET 04-239
CHANNEL 240A - STOUGHTON, WI

Mid-West Management, Inc.
Madison, WI

August 17, 2004

Prepared For: Mr. John Bauer
Mid-West Management, Inc.
P.O. Box 2058
Madison, WI 53701

CARL E. SMITH CONSULTING ENGINEERS

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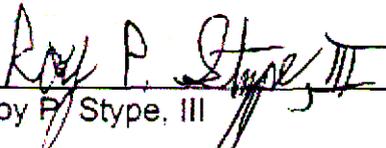
Table 1.2 - Area of Population Data For
Underserved Portions of
Proposed WBKY Loss Area

ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)

Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by Mid-West Management, Inc. to prepare the attached "Engineering Statement In Support of Comments - MB Docket 04-239 - Channel 240A - Stoughton, WI."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Roy P. Stype, III

Subscribed and sworn to before me on **August 17, 2004**.



Notary Public

NANCY A. ADAMS, Notary Public
Residence - Cuyahoga County
State Wide Jurisdiction, Ohio
My Commission Expires Sept. 5, 2005

/SEAL/

ENGINEERING STATEMENT

This engineering statement is prepared on behalf of Mid-West Management, Inc. It supports comments in MB Docket 04-239, which proposes to reallocate FM Channel 240A from Portage, Wisconsin to Stoughton, Wisconsin and modify the license for WBKY(FM) - Portage, Wisconsin to specify operation on Channel 240A in Stoughton, Wisconsin.

Paragraph 4 of the *Notice of Proposed Rulemaking ("NPRM")* in this proceeding specifically states that Stoughton, the proposed new community of license "...is not in any urbanized area...which does not trigger a *Tuck* analysis." As shown below, however, this statement is simply incorrect. Figure 1.0 is a map exhibit, generated by the Census Bureau's American Factfinder web site¹, which depicts the boundaries of the Madison, Wisconsin urbanized area. Figure 1.1 is a similar map exhibit depicting an expanded view of the southeast portion of this urbanized area, as well as the boundaries of Stoughton. As shown in this map exhibit, nearly all of the community of Stoughton is considered to be within the Madison urbanized area.² As a result, contrary to the claims made in this NPRM, the submission of a *Tuck* showing is required to evaluate whether or not Stoughton is sufficiently independent from this urbanized area to justify the first local service preference claimed in this proposal.³

¹http://factfinder.census.gov/home/saff/main.html?_lang=en

²Only two populated census blocks, consisting of 0.26 square kilometers of the land area within Stoughton (2.5% of the community's total land area) and containing a population of 23 persons (0.2% of Stoughton's total population) are located outside the Madison urbanized area.

³No such showing has been submitted by the petitioner in this proceeding.

The NPRM in this proceeding also notes that this proposed reallocation will leave portions of the proposed loss area with less than five full time aural services. As outlined below, however, it appears, based on an independent analysis, that this NPRM significantly understates the magnitude and nature of the underserved portions of this loss area. Figure 1.2 is a map exhibit depicting this loss area, which consists of the entire area within the predicted 1 mV/m contour for the presently authorized operating facilities. Pursuant to applicable FCC policy, this contour was projected based on the presently licensed WBKY operating facilities (5.4 kilowatts effective radiated power at 98 meters above average terrain) assuming uniform terrain.⁴

Independent studies were conducted to identify all other stations which provide full time aural service to any portion of this loss area. For all FM stations⁵, uniform terrain was assumed and all classes of stations were assumed to provide service to their 1 mV/m contour, pursuant to FCC policy. All commercial FM stations, with the exception of Class A, Class C, and Class C0 stations, were assumed to be operating with the maximum facilities permitted for their class. Calculations for commercial Class C and Class C0 stations and all noncommercial educational FM stations were based on the stations' actual notified operating facilities.⁵ Commercial Class A stations were consid-

⁴FCC policies for evaluating gain and loss areas in an allotment proceeding require that all contours be projected assuming uniform terrain. These policies also require that Class A stations be assumed to operate with the greater of either their presently authorized operating facilities or the former Class A maximum of 3 kilowatts effective radiated power at 100 meters above average terrain. Based on the data cited in Paragraph 3 of the NPRM in this proceeding, it appears that the FCC's independent analysis of this loss area incorrectly assumed that WBKY presently operates with the present Class A maximum facilities of 6 kilowatts effective radiated power at 100 meters above average terrain.

⁵Pursuant to FCC policy for allotment proceedings, vacant allotments and unbuilt construction permits were considered to be operating facilities for the purposes of these studies.

⁶Pursuant to FCC policy, vacant Class C and Class C0 allotments were assumed to be operating with the minimum permitted facilities for their class.

ered to be operating with the greater of their actual operating facilities or the former Class A maximum of 3 kilowatts effective radiated power at 100 meters above average terrain. All AM contours were projected utilizing the notified nighttime facilities for each station and conductivity data from FCC Figure M3. Class A AM stations were considered to provide service to their 0.5 mV/m groundwave contours, while all other AM stations were considered to provide service to their nighttime interference free contour, as defined by Section 73.182 of the FCC Rules. Class D AM stations operating at night with subminimum facilities were not considered in these studies, due to the fact that these stations operate on a secondary basis at night and are considered by the FCC to be daytime only stations, in spite of their limited nighttime facilities.

Figure 1.2 also depicts the results of these studies. Table 1.2 presents a detailed summary of the land area and population within the underserved portions of this loss area. All population and land area values were determined using census block data from the 2000 U. S. Census and the centroid method. This method uses proprietary computer software to determine if the geographic coordinates specified by the Census Bureau for a census block are located within the area being evaluated. The entire population and land area of any census block whose specified (or "centroid") coordinates are found to be within the area being evaluated are then attributed to this area. The computer software then sums the population and land area data for all census blocks attributed to the area being evaluated to determine the total area and population associated with the area under study. Areas within the area being studied which encompass bodies of water or foreign land area are, thus, not included in these land area and population figures.

As shown by this data, significant portions of this loss area⁷ will be left with less than five full time aural services if the proposed reallocation of Channel 240A to Stoughton is adopted. Of particular importance, it should be noted that this proposed reallocation would leave a land area of 68.5 square kilometers containing a population of 2,359 persons which would continue to receive only one full time aural service.⁸ In contrast, the entire gain area which would result from this proposed reallocation is extremely well served⁹, with no portion presently receiving less than nine full time aural services.

⁷Based on the data outlined in Table 1.2, 63.5% of the 2281.9 square kilometers of land area and 62.3% of the 61,674 persons presently receiving 1 mV/m service from WBKY would be left with less than five full time aural services if this reallocation proposal is adopted.

⁸The only station which would provide a full time aural service to this newly created "gray area" would be WOLX-FM - Baraboo, Wisconsin.

⁹These studies found that 34 different stations provide full time aural service to some portion of this gain area.

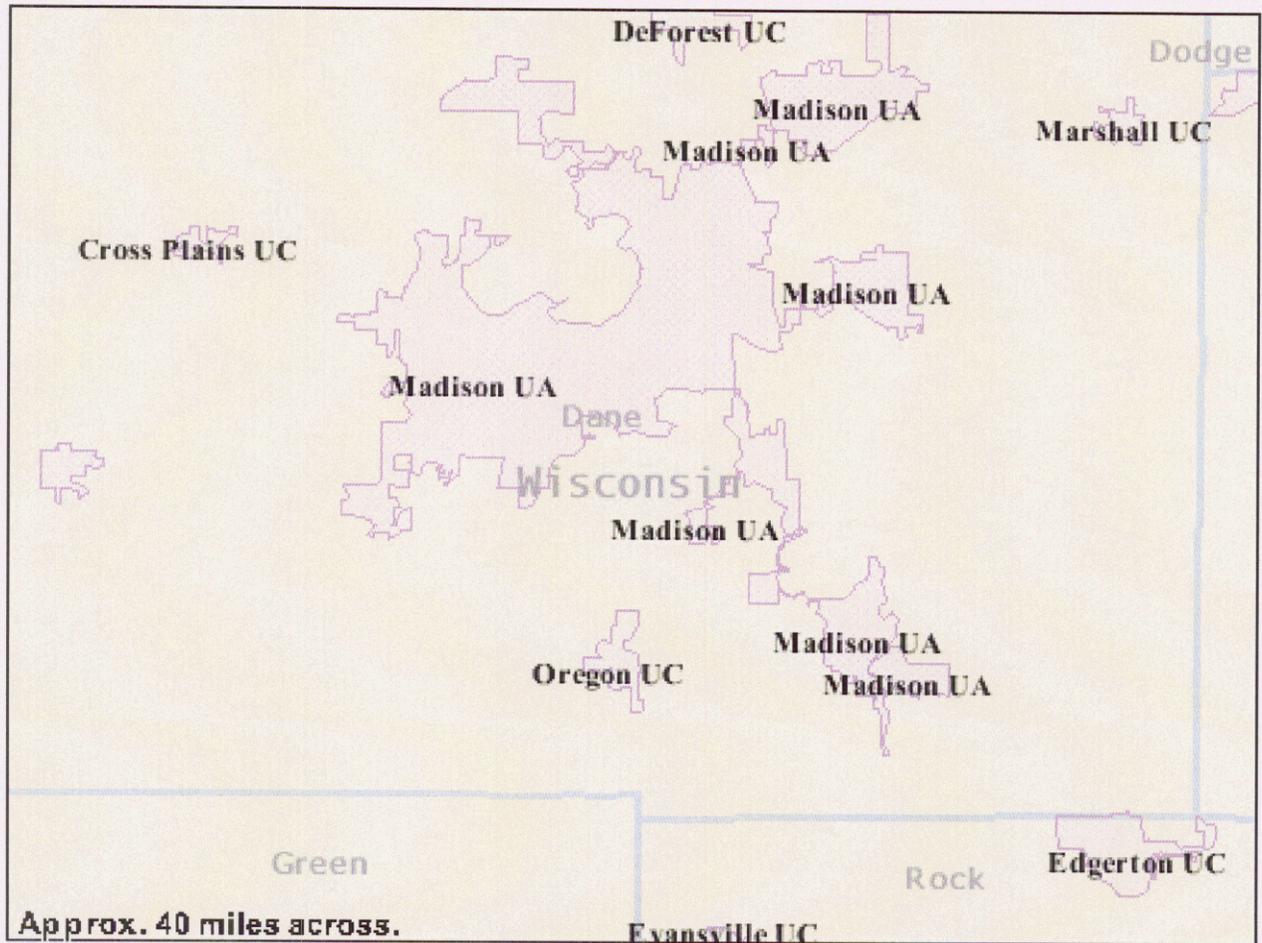


FIG. 1.0

CARL E. SMITH CONSULTING ENGINEERS
 2324 N. CLEVE-MASS RD., BOX 807
 BATH, OHIO 44210-0807
 (330) 659-4440

MADISON URBANIZED AREA
 MID-WEST MANAGEMENT, INC.
 MADISON, WI

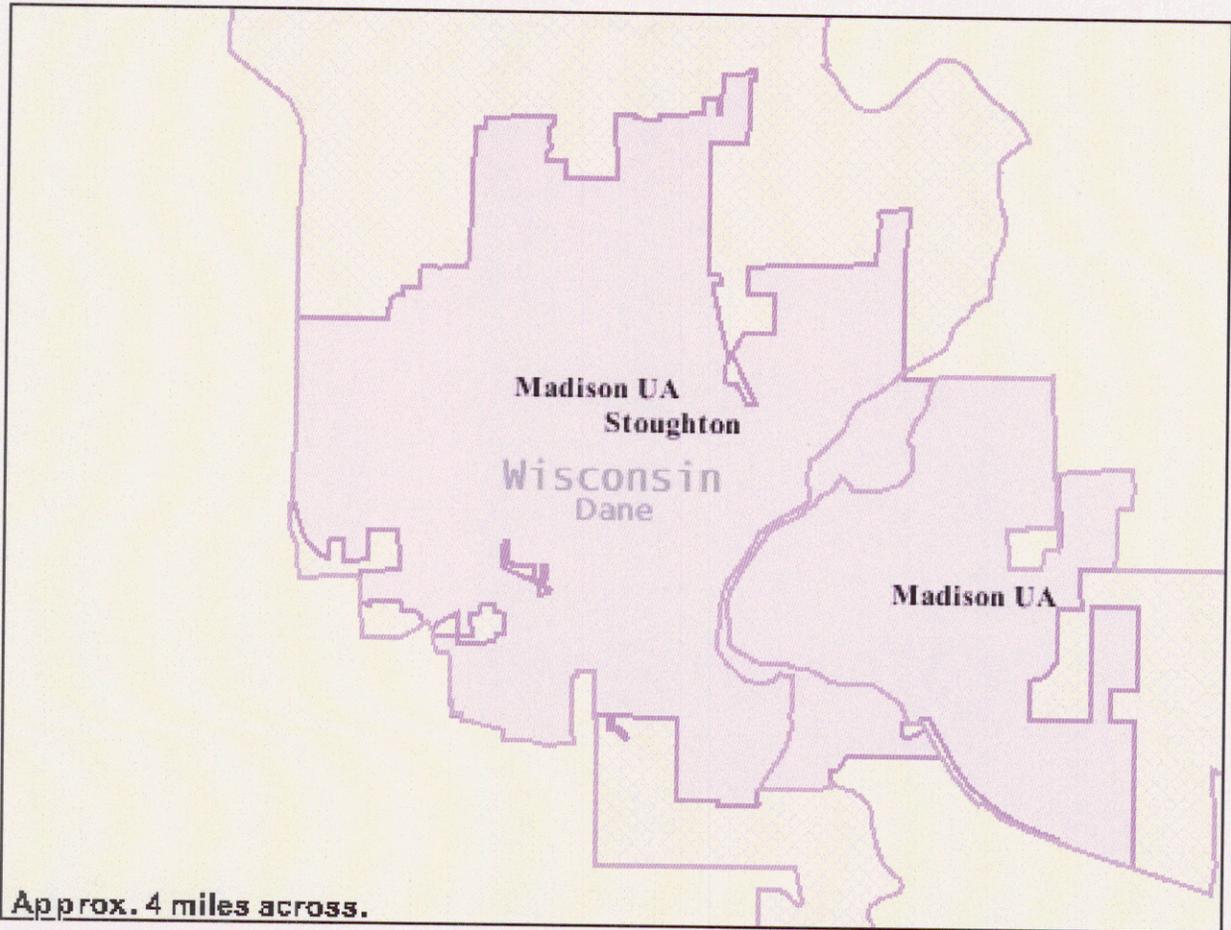
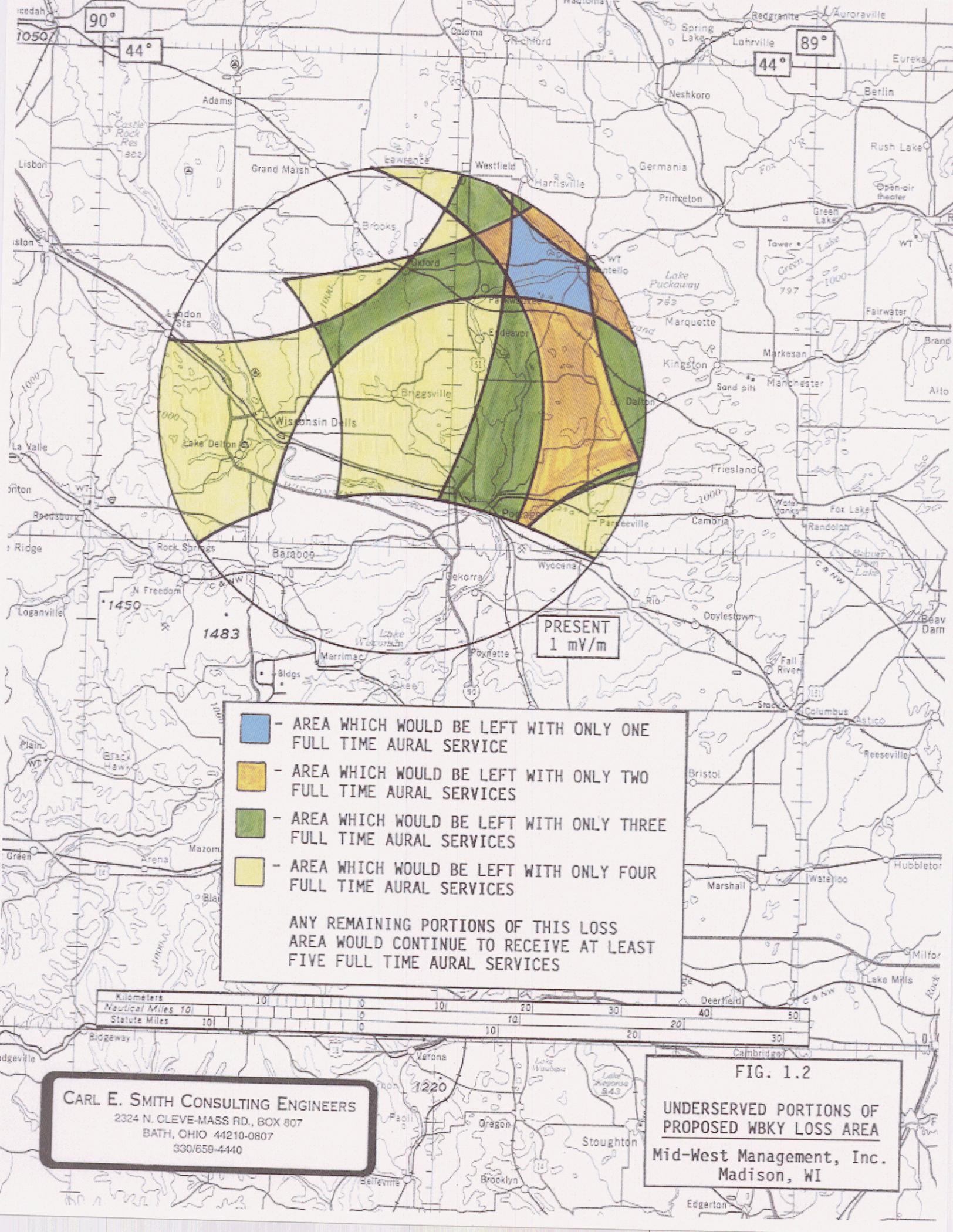


FIG. 1.1

CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
(330) 659-4440

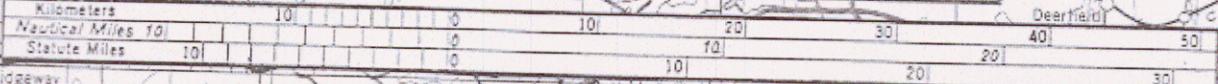
EXPANDED VIEW OF SOUTHEAST
PORTION OF MADISON URBANIZED AREA
SHOWING STOUGHTON BOUNDARIES

MID-WEST MANAGEMENT, INC.
MADISON, WI



PRESENT
1 mV/m

- AREA WHICH WOULD BE LEFT WITH ONLY ONE FULL TIME AURAL SERVICE
 - AREA WHICH WOULD BE LEFT WITH ONLY TWO FULL TIME AURAL SERVICES
 - AREA WHICH WOULD BE LEFT WITH ONLY THREE FULL TIME AURAL SERVICES
 - AREA WHICH WOULD BE LEFT WITH ONLY FOUR FULL TIME AURAL SERVICES
- ANY REMAINING PORTIONS OF THIS LOSS AREA WOULD CONTINUE TO RECEIVE AT LEAST FIVE FULL TIME AURAL SERVICES



CARL E. SMITH CONSULTING ENGINEERS
 2324 N. CLEVE-MASS RD., BOX 807
 BATH, OHIO 44210-0807
 330/659-4440

FIG. 1.2
UNDERSERVED PORTIONS OF PROPOSED WBKY LOSS AREA
 Mid-West Management, Inc.
 Madison, WI

TABLE 1.2
 AREA AND POPULATION DATA FOR
 UNDERSERVED PORTIONS OF
PROPOSED WBKY LOSS AREA
 Mid-West Management, Inc.
 Madison, WI

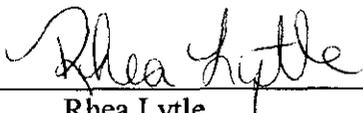
<u>Portions of Loss Area Which Will Continue To Receive:</u>	<u>Area (Square Kilometers)</u>	<u>Population (2000 Census)</u>
One full time aural service	68.5	2,359
Two full time aural services	155.1	1,313
Three full time aural services	453.7	15,815
Four full time aural services	772.7	18,914
Total underserved area	1,450.0	38,401

CERTIFICATE OF SERVICE

I, Rhea Lytle, a secretary with the law firm of Shaw Pittman LLP, do hereby certify that a copy of the foregoing “**COMMENTS IN OPPOSITION TO NOTICE OF PROPOSED RULE MAKING**” was mailed, first class, postage prepaid this 19th day of August 2004 to the following:

John A. Karousos*
Assistant Chief, Audio Division
Media Bureau
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445 12th Street, S.W., Room 3-A266
Washington, D.C. 20554

Denise B. Moline, Esq.
PMB #215
1212 S. Naper Blvd. #119
Naperville, Illinois 60540



Rhea Lytle

*Via Hand Delivery