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Federal Communications Commission
Office of Secretary

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of

Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Fishers, Lawrence, Indianapolis)
and Clinton, Indiana))
)

MB Docket No. 05-67
RM-11116

To: Office of the Secretary

ORIGINAL

RESPONSE TO ORDER TO SHOW CAUSE,
COMMENTS AND COUNTERPROPOSAL

WORD POWER, INC.

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April 25, 2005

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SUMMARY

Word Power, Inc., the licensee of Station WPFR-FM, Clinton, Indiana, submits that the Commission should deny the proposal jointly filed by Indy Lico, Inc., the licensee of Station WISG(FM), Fishers, Indiana, and WFMS Lico, Inc., the licensee of Station WFMS(FM), Indianapolis, Indiana to: (1) upgrade from Channel 230A to Channel 230B1 at Fishers, reallocate Channel 230B1 from Fishers to Lawrence, Indiana, and modify WISG's license accordingly; (2) reallocate Channel 238B from Indianapolis to Fishers, Indiana, and modify WFMS's license accordingly; and (3) substitute Channel 229A for Channel 230A at Clinton, Indiana and modify WPFR-FM's license accordingly.

As Word demonstrates in this Response to Order to Show Cause, Comments and Counterproposal, Lawrence is not sufficiently distinct from the Indianapolis Urbanized Area and its core city of Indianapolis to qualify as an independent community for allotment purposes, and Petitioners' proposal is therefore not entitled to a first local service preference. Petitioners' proposal fails to promote the public interest, and instead will eliminate WPFR-FM's valuable service to areas between Indianapolis and Clinton, Indiana, currently underserved by noncommercial educational stations.

If the Commission wishes to provide Lawrence with a local service, then Word counterproposes modification of the proposed WISG transmitter site to a Class A allocation transmitter site east of Lawrence, the upgrade of Channel 230A to 230B1 at Clinton, Indiana, and the modification of WPFR-FM's license accordingly. This counterproposal better serves the public interest by providing Lawrence with local service while protecting and expanding WPFR-FM's coverage of areas underserved by noncommercial educational stations.

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To: Office of the Secretary

**RESPONSE TO ORDER TO SHOW CAUSE,
COMMENTS AND COUNTERPROPOSAL**

Word Power, Inc. (“Word”), the licensee of Noncommercial Educational FM Station WPFR-FM, Clinton, Indiana, by its attorneys and pursuant to Sections 1.415 and 1.420 of the Commission’s Rules, hereby submits its Response to Order to Show Cause, Comments and Counterproposal in connection with the *Notice of Proposed Rule Making and Order to Show Cause* in MB Docket No. 05-67, DA 05-551, released March 4, 2005 (“*NPRM*”).

Introduction

Pursuant to a Petition for Rule Making jointly filed by Indy Lico, Inc. (“Indy Lico”), the licensee of FM Station WISG(FM), Fishers, Indiana, and WFMS Lico, Inc. (“WFMS Lico”), the licensee of FM Station WFMS(FM), Indianapolis, Indiana (Indy Lico and WFMS Lico together as “Petitioners”), the *NPRM* proposes: (1) the upgrade from Channel 230A to Channel 230B1 at Fishers, the reallocation of Channel 230B1 from Fishers to Lawrence, Indiana, and the modification of WISG’s license accordingly; (2) the reallocation of Channel 238B from Indianapolis to Fishers, Indiana, and the

modification of WFMS's license accordingly; and (3) the substitution of Channel 229A for Channel 230A at Clinton, Indiana, and the modification of WPFR-FM's license accordingly.

In this Response to Order to Show Cause, Comments and Counterproposal, Word demonstrates why it should not be required to move WPFR-FM from Channel 230A to Channel 229A to accommodate Petitioners' proposed changes – namely because Petitioners' proposal fails to promote the public interest, and instead will eliminate WPFR-FM's valuable service to the area between Indianapolis and Clinton, Indiana, an area currently underserved by noncommercial educational stations.

Word establishes that Lawrence, Indiana is not an independent community for purposes of the Commission's FM allotment priorities, but is in fact dependent upon and closely linked to the Indianapolis Urbanized Area and its core city of Indianapolis, Indiana, and is therefore undeserving of a first local transmission service preference. The changes proposed by Petitioners – which amount to shuffling their commonly-owned stations around the Indianapolis market to increase coverage thereto – violate fundamental Commission policies governing the allotment of FM channels among communities and should be denied accordingly. Severe disruption to WPFR-FM's service to listeners is not warranted in light of the limited public interest benefit of improving service to the already well-served market of metropolitan Indianapolis.

If the Commission wishes to provide Lawrence with a local service, then Word counterproposes modification of the proposed WISG transmitter site to a Class A allocation transmitter site east of Lawrence, the upgrade of Channel 230A to 230B1 at Clinton, Indiana, and the modification of WPFR-FM's license accordingly. This

counterproposal better serves the public interest by providing Lawrence with local service while protecting and expanding WPFR-FM's coverage of areas underserved by noncommercial educational stations. In support thereof, Word states as follows:

WPFR-FM SHOULD NOT BE REQUIRED TO CHANGE CHANNELS TO ACCOMMODATE A PROPOSAL THAT DOES NOT SERVE THE PUBLIC INTEREST

The primary purpose of Petitioners' proposal to move WISG to Lawrence is to boost Petitioners' coverage of the lucrative metropolitan Indianapolis market. As discussed below, Lawrence is so closely connected to Indianapolis that licensing a station to Lawrence is equivalent to licensing a station to Indianapolis. There are no underserved areas or populations that stand to gain from the relocation of WISG to Lawrence. And any marginal benefits the public may derive from the addition of one more commercial radio station to the Indianapolis market are outweighed by the harm Petitioners' proposal will cause WPFR-FM's operations.

As evidenced by the Technical Exhibit attached hereto as **Exhibit 1**, WPFR-FM currently provides its unique noncommercial educational service to listeners well beyond its 60 dBu contour to areas between Indianapolis and Clinton, Indiana underserved by educational services. As **Exhibit 1** demonstrates, much of this service would be wiped out by the WISG Channel 230B1 operation proposed by Petitioners.¹ The listener letters collected in **Exhibit 2** attached hereto demonstrate that listeners throughout these areas greatly value WPFR-FM's noncommercial educational programming as an irreplaceable, one-of-a-kind service. These listeners should not be deprived of WPFR-FM's unique

¹ The Technical Exhibit in **Exhibit 1** includes only analog service, in accordance with existing FM rules. However, WISG's IBOC operations would also cause significant interference to WPFR-FM on Channel 229A, as digital operations result in an interfering loud buzz on adjacent channels.

service so that already well-served listeners in Indianapolis can receive the upgraded signal of one more commercial FM radio station. Word submits that the public interest in maintaining a valuable noncommercial educational service in an underserved area shows ample cause as to why WPFR-FM should not be required to change channels to accommodate Petitioners' desire for a bigger slice of the Indianapolis market.

PETITIONERS' PROPOSAL IS NOT ENTITLED TO A FIRST LOCAL SERVICE PREFERENCE

Petitioners seek to change the community of license of WISG from Fishers to Lawrence, Indiana, and claim that the proposed change will result in a preferred arrangement of allotments by bringing Lawrence its first local service.² However, Lawrence is not truly independent of the Indianapolis Urbanized Area and its core city of Indianapolis, and, as such, does not warrant a first local service preference.³

The Commission undertakes a *Tuck* analysis to determine whether a proposed reallocation community is in fact independent of a nearby Urbanized Area. The three-part test set forth in *Tuck* demonstrates that Lawrence, Indiana is integrally connected to the Indianapolis Urbanized Area and is therefore not entitled to a first local service preference.

² See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982); Petition at 3 (noting that provision of first local service to Lawrence under Priority 3 preferred over retention of nineteen local services to Indianapolis under Priority 4).

³ See *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) ("*Tuck*").

1. The Realloted Channel 230B1 Could Deliver a City-Grade Signal to a Majority of the Indianapolis Urbanized Area

First, the Commission considers the extent to which the proposed facility would serve the urbanized area. Here, by Petitioners' own admission, the proposed WISG facility would place a 70 dBu contour over 62% of the Indianapolis Urbanized Area. *See* Petition at 4. Petitioners' claim that a *Tuck* analysis is not necessary here because both Lawrence and Fishers, Indiana, WISG's current community of license, are within the Indianapolis Urbanized Area is unavailing. From its current allotment, WISG places a 70 dBu contour over 13.8% of the Indianapolis Urbanized Area. *See* Petition at n 1. The substantial increase in coverage to the Indianapolis Urbanized Area contemplated by Petitioners' proposal clearly implicates the Commission's policies discouraging the migration of stations from underserved rural areas to well-served urban areas, regardless of whether Fishers and Lawrence both are located within the Indianapolis Urbanized Area.

2. The Relative Size and Proximity of the Two Communities Demonstrates that Lawrence is not Independent of Indianapolis

Second, the Commission examines the populations of the two communities, and the proximity of the suburban community to the urban area. In this case, the population of Lawrence is less than five percent of the population of Indianapolis, and less than three percent of the population of the Indianapolis Urbanized Area.⁴ Moreover, as conceded

⁴ According to Census 2000: (1) the population of Lawrence is 38,915 (*see* US Census Bureau, American FactFinder, DP-1 – Profile of General Demographic Characteristics, Lawrence city, Indiana (2000), attached as **Exhibit 3** hereto); (2) the population of Indianapolis is 781,870 (*see* US Census Bureau, American FactFinder, DP-1 – Profile of General Demographic Characteristics, Indianapolis city, Indiana (2000), attached as **Exhibit 4** hereto), and the population of the Indianapolis Urbanized Area is 1,218,919 (*see* **Exhibit 5** attached hereto).

by Petitioners, the reference coordinates for Lawrence are located a mere 8.5 miles from the reference coordinates for Indianapolis. *See* Petition at 4 (citing Lawrence as 13.8 km from Indianapolis).⁵

In fact, this quoted distance – presumably based on the distance between Lawrence’s post office and Indianapolis’s main post office – does not provide an accurate picture of the true geographic overlap between Lawrence and Indianapolis. There is sparse information available concerning the boundaries of Lawrence, and Word’s attempts to obtain materials setting forth Lawrence’s precise limits were unsuccessful. However, an examination of a map of Indianapolis indicates that Lawrence is immediately adjacent to, and surrounded on all sides by, Indianapolis, except that the two communities share the same eastern boundary, which is also the eastern boundary of Marion County. This geographic overlap clearly suggests that Lawrence is merely a close-in bedroom suburb of Indianapolis, inextricably intertwined with the larger city, rather than an independent community. The enormous difference in populations of Lawrence and Indianapolis and the fact that the two communities are directly adjacent are unambiguous signs of a classic city-suburb relationship in which the suburban community “cannot be separated from its larger parent community for allotment purposes.” *Eatonton and Sandy Springs, Georgia*, 6 FCC Rcd 6580, 6584 (MMB 1991), *app. for rev. dismissed*, 12 FCC Rcd 8392 (MMB 1997).

⁵ *See also RKO General, Inc.*, 5 FCC Rcd 3222 (1990) (rejecting claim of independent community status where smaller community within 16 miles of substantially larger community).

3. *Tuck* Sub-factors Further Demonstrate that Lawrence is not Independent of Indianapolis

Finally, the Commission considers the interdependence between the two communities by examining eight sub-factors. An evaluation of these sub-factors together with the first two *Tuck* elements discussed above demonstrate that Lawrence is not independent of Indianapolis and that Petitioners' proposal is not entitled to a first local service preference.

- (i) The extent to which the community residents work in the larger metropolitan area rather than the specified community

As indicated above, Lawrence is in close proximity to Indianapolis. This close proximity explains why the mean commute time for Lawrence residents is 25 minutes. *See* US Census Bureau, American FactFinder, DP-3 – Profile of Selected Economic Characteristics, Lawrence city, Indiana (2000), attached hereto as **Exhibit 6**. 36% of the employed population of Lawrence is engaged in “management, professional, and related occupations,” 31% in “sales and office occupations,” and 12.8% in “production, transportation, and material moving occupations.” *See id.* These workers undoubtedly head daily to Indianapolis for work, given that there are few businesses in Lawrence that fall within these categories. Indeed, related Census data confirms that only 16% of the employed population of Lawrence actually works in Lawrence. *See* US Census Bureau, American FactFinder, P27 – Place of Work for Workers 16 Years and Over, Lawrence city, Indiana (2000), attached hereto as **Exhibit 7**. As these statistics demonstrate, the vast majority of the residents of Lawrence depend upon the greater Indianapolis Urbanized Area for their livelihood. This sub-factor clearly supports the determination that Lawrence is dependent upon and integral with Indianapolis.

- (ii) Whether the smaller community has its own newspaper or other media that cover the community's needs and interests

Petitioners cite *Topics* and *Lawrence Community Journal* as local media covering Lawrence's needs and interests. However, *Topics* cannot be described as Lawrence's own newspaper, as evidenced by the paper's online mast, which reads "Topics.com serving Carmel, Fishers, Geist, Fortville, Lawrence, Zionsville and Northern Marion County."⁶ Given that *Topics* serves a number of communities, it offers no support to Petitioner's contention that Lawrence is independent of Indianapolis. Moreover, the *Lawrence Community Journal*, by Petitioners' own admission, is a weekly newsletter of limited circulation.⁷ The *Journal* similarly offers no evidence of the independent status of Lawrence vis-à-vis Indianapolis. Instead, the lack of any substantive media truly local to Lawrence suggests that Lawrence residents look to Indianapolis-based media sources, such as the Indianapolis Star, for their community news.

- (iii) Whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area

To support its contention that officials and residents view Lawrence as a community separate and independent from Indianapolis, Petitioners offer a short historical description of Lawrence and a quote from the mayor concerning the characteristics that make Lawrence a nice place to live. *See* Petition at 5. This evidence does nothing to establish Lawrence as independent from, rather than a bedroom community to, Indianapolis.

⁶ See <http://www.topics.com>.

⁷ Beyond Petitioner's reference to the *Lawrence Community Journal*, Word was unable to locate any evidence of the *Journal's* existence, either in the attachments to the Petition or on the Internet.

- (iv) Whether the specified community has its own local government and elected officials

Lawrence has its own mayor and city council.

- (v) Whether the smaller community has its own telephone book provided by the local telephone company or zip code

Petitioner cites 46226 as the zip code assigned to Lawrence. *See* Petition at 6.

However, a “Find City by ZIP Code” search on the US Postal Service website pulls up Indianapolis as the “Acceptable (Default)” city associated with 46226. *See Exhibit 8* attached hereto. Lawrence is listed second as “Acceptable.” Petitioners have not demonstrated that Lawrence has its own phonebook.

- (vi) Whether the community has its own commercial establishments, health facilities and transportation systems

Petitioners cite a number of commercial establishments and religious and community organizations that include “Lawrence” in their names or are otherwise located within Lawrence. However, as the Commission has previously recognized, the fact that some businesses and organizations identify themselves with a particular section of a large urbanized area does not establish that section as independent of the whole:

[G]iven the intensity and diversity of human activity in urbanized areas, it is commonplace that organizations emerge that identify themselves with some geographic component of the urbanized area, such as a neighborhood, subdivision or political district. The test here is not whether such institutions exist, but what they indicate about the relationship between the suburb and the metropolis.

Eatonton and Sandy Springs, Georgia, supra at 6585. A quick search of Yahoo’s yellow pages for Indiana businesses with Lawrence in their name indicates that the vast majority of such businesses actually have Indianapolis addresses. *See Exhibit 9* attached hereto. Further, a number of businesses specifically cited by Petitioners as “Lawrence retail and

commercial businesses” show Indianapolis addresses in Yahoo’s yellow pages, including Farrar Electric and the Village Press. *See* Petition at 6; **Exhibit 10** attached hereto. The fact that Indianapolis is the common address of these “Lawrence” organizations and businesses demonstrates Lawrence’s dependence upon and association with Indianapolis.

Petitioners provide no evidence of health facilities or public transportation specifically serving Lawrence.

- (vii) The extent to which the community and central city are part of the same advertising market

Lawrence is part of the Indianapolis Metropolitan Statistical Area, the Indianapolis Metro Market, and the Indianapolis Designated Market Area. These factors, together with the lack of local media serving Lawrence, indicate that Lawrence does not have an advertising market independent from Indianapolis.

- (viii) 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

Residents of Lawrence attend public schools in the “Metropolitan School District of Lawrence Township, *Indianapolis, Indiana*” (emphasis added).⁸ According to the Lawrence Township website, its school district is located “in the northeast suburb of Marion County in *Indianapolis, Indiana*” (emphasis added).⁹ Further, the city of Indianapolis claims Lawrence schools as part of its public school system.¹⁰ Lawrence has its own police and fire departments.

⁸ *See* <https://district.ltschools.org>.

⁹ *See* <https://district.ltschools.org/about/welcome.php>.

¹⁰ *See* <http://imaps.indygov.org/schools/process.asp>.

The *Tuck* analysis set forth above demonstrates that Lawrence is not independent of Indianapolis. The first two elements – the level of service delivered to the Urbanized Area, and the size and proximity of Lawrence to Indianapolis – indicate that, as a community, Lawrence is part of and overshadowed by Indianapolis. With regard to the third element – interdependence between the two communities – sub-factors (i), (ii), (v), (vi), (vii) and (viii) demonstrate Lawrence’s integral connection to Indianapolis. Sub-factor (iii) does not cut either way. Only sub-factor (iv) suggests a measure of independence for Lawrence. In short, Lawrence is not truly independent of the Indianapolis Urbanized Area, and, as such, does not warrant a first local service preference.

WORD’S COUNTERPROPOSAL BETTER SERVES THE PUBLIC INTEREST

Stripped of a first local service preference for Lawrence, the public interest benefit of Petitioners’ proposal is limited to a predicted net gain in population of 267,878 persons for WISG. *See* Petition at 2. Any benefits the public may derive from Petitioners’ efforts to reposition their stations for optimal coverage of the Indianapolis market are trumped by the harm such efforts will cause WPFR-FM’s operations.

As discussed above, and as evidenced by the Technical Exhibit in **Exhibit 1**, WPFR-FM provides its unique noncommercial educational service to listeners in areas between Indianapolis and Clinton, Indiana underserved by educational services. As **Exhibit 1** demonstrates, Petitioners’ proposed WISG Channel 230B1 would eliminate most of this service. WPFR-FM’s avid listeners (see **Exhibit 2**) should not be deprived of WPFR-FM’s unique service so that already well-served listeners in Indianapolis can receive the signal of one more commercial FM radio station.

Should the Commission wish to provide local service to Lawrence, Indiana, Word submits that a WISG Channel 230A operation at a transmitter site east of Lawrence, as specified in the Technical Exhibit attached as **Exhibit 11** hereto, more than adequately serves this purpose. Assigning WISG Channel 230A at this alternative transmitter site would in turn allow WPFR-FM to upgrade to Channel 230B1. As **Exhibit 11** demonstrates, this upgrade would enable WPFR-FM to bring a first and second noncommercial educational service to underserved areas between Indianapolis and Clinton, Indiana. By protecting and expanding WPFR-FM's service to these underserved areas, the Commission would provide a much greater benefit to the public than by acquiescing to WISG's increased coverage of the already well-served Indianapolis market. Word's Counterproposal, which promises to bring noncommercial educational service to rural areas, is truly in the public interest; it should be preferred over Petitioners' commercial, urban-oriented proposal. If Word's Counterproposal is granted, it will file an application for Channel 230B1 at Clinton and construct the facilities as authorized.

Conclusion

In conclusion, Petitioners' proposal is fatally flawed by the fact that Lawrence, Indiana is not an independent community for purposes of the Commission's FM allotment priorities, but is rather dependent upon and closely linked to the Indianapolis Urbanized Area. The changes sought by Petitioners amount to thinly-veiled efforts to increase service to the Indianapolis market, and, as such, violate fundamental Commission policies set forth in *Tuck*. Should the Commission nonetheless determine that Lawrence is entitled to a local service, Word submits that its Counterproposal better

serves the public interest than Petitioners' proposal. WPFR-FM's unique programming provides a valuable public service to areas where noncommercial educational programming is scarce. Allowing WISG to relocate to Lawrence on Channel 230B1 would drastically impair WPFR-FM's ability to reach listeners in these areas. In order to protect and expand WPFR-FM's noncommercial educational service to these underserved areas, the Commission should grant WPFR-FM an upgrade to Channel 230B1 at Clinton, and allow WISG to serve Lawrence on Channel 230A from a transmitter site east of Lawrence. WPFR-FM's increased service to underserved areas better serves the public than granting increased power to WISG to expand coverage to an urban area already fully covered by numerous stations.

WHEREFORE, Word Power, Inc. respectfully requests that the Commission deny the Petition for Rule Making filed by Indy Lico, Inc. and WFMS Lico, Inc. and grant Word Power, Inc.'s Counterproposal.

Respectfully Submitted,

WORD POWER, INC.



Frank R. Jazzo
John C. Butcher
Its Counsel

FLETCHER, HEALD & HILDRETH, P.L.C.

1300 North 17th Street
11th Floor
Arlington, VA 22209
703-812-0400

April 25, 2005

EXHIBIT 1

TECHNICAL EXHIBIT
IN OPPOSITION TO
A PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS
CLINTON, FISHERS, LAWRENCE AND INDIANAPOLIS, IN

Technical Narrative

WPFR-FM, Clinton, IN operates as a Class A station on FM channel 230. Because of a scarcity of educational services in the area between Clinton and Indianapolis, IN, WPFR-FM has provided a needed service to this area. Listener reports are received from areas well beyond the protected 60 dBu contour. Listeners often call in or write to us from locations out to the WPFR-FM 45 dBu F(50,50) contour.

The attached map illustrates the scarcity of educational services beyond the WPFR-FM 60 dBu contour but within the 45 dBu F(50,50) contour. The map illustrates the predicted WPFR-FM contours, if required to move to channel 229A, from 60 dBu to 45 dBu F(50,50) at 1 dBu intervals along with the overlapping WISG, Lawrence, IN contours, assuming class B1 operation on channel 230, 54 dBu to 39 dBu F(50,10). The line depicting interference to WPFR-FM illustrates the large area that would be obliterated by WISG (B1) as well as the area served now by WPFR-FM, providing a first or second educational broadcast service.

The urgent need for more power for WPFR-FM to better serve this unserved area provides far greater use of the FM channels 229 and 230 than a power increase for an Indianapolis, IN station. WPFR-FM would provide service where none now exists while WISG would merely run up the power on an existing station where its service area is 100% covered by a plethora of existing broadcast services.

Increased service to rural areas is more to be desired than power increases in densely populated areas with multiple services.

Paul Dean Ford, *Broadcast Engineering Consultant*

Clinton, Fishers, Lawrence and Indianapolis, Indiana

A handwritten signature in cursive script that reads "Paul Dean Ford". The signature is fluid and elegant, with the first letters of each name being capitalized and prominent.

Paul Dean Ford, P.E.

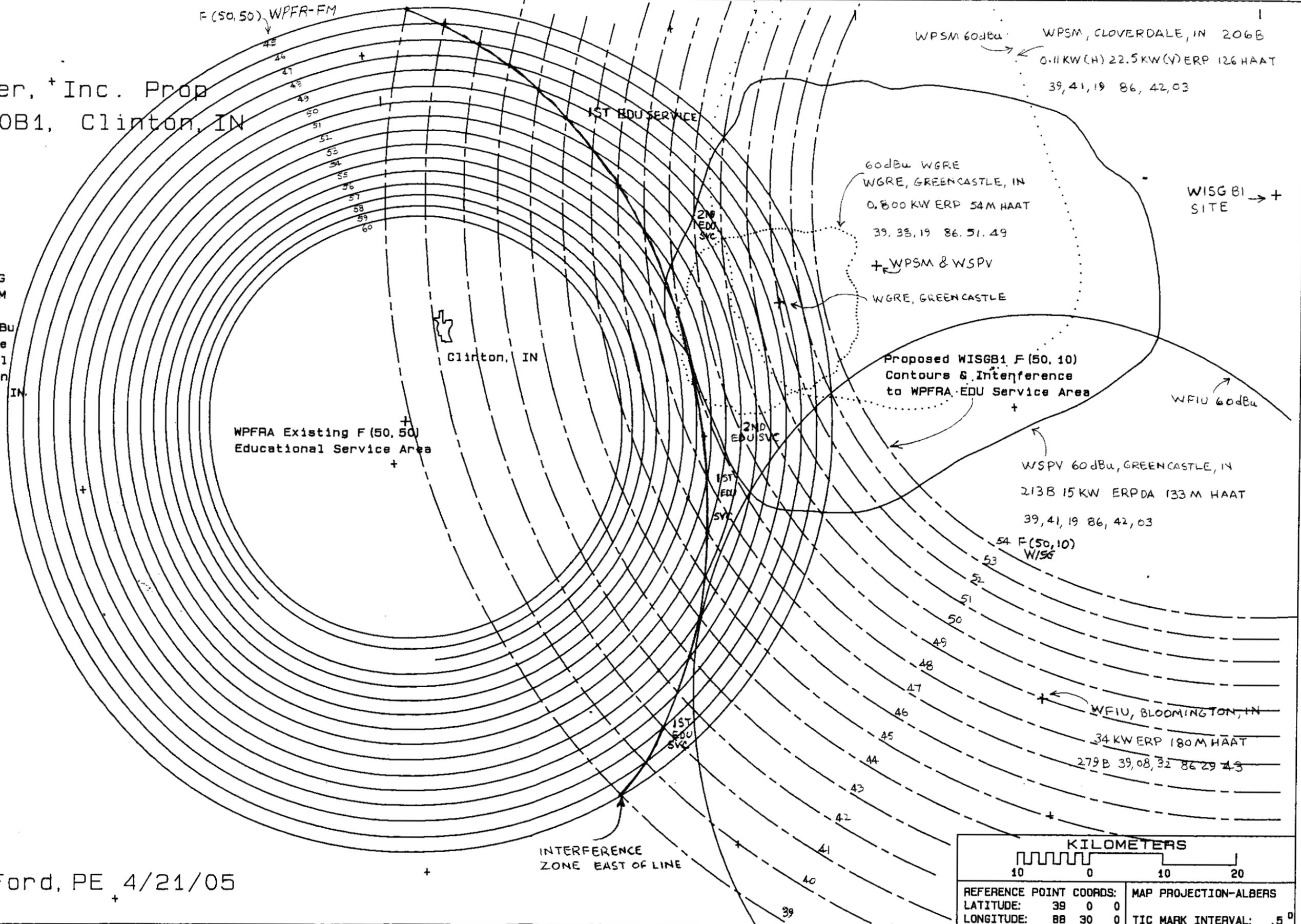
18889 North 2350th Street

Dennison, IL 32423

(217) 826-9673

Word Power, Inc. Prop
Alloc 230B1, Clinton, IN

MAP Interference to the Existing Educational Service Area WPFRA-FM if Forced to 229(A) by WISG Proposed 230B1. WPFRA-FM Presently Serves to its Proposed Predicted 45 dBu F(50,50) Contour Because of dearth of Educational Services in area between Clinton & Indianapolis, IN.



Paul Dean Ford, PE 4/21/05

KILOMETERS	
10	0 10 20
REFERENCE POINT COORDS:	MAP PROJECTION-ALBERS
LATITUDE: 39 0 0	TIC MARK INTERVAL: .5
LONGITUDE: 88 30 0	

EXHIBIT 2

March 1, 2005

**Word Power, Inc. WPFR-FM
18889 N 2350 Street
Dennison, IL 62423**

Dear Eleanor, Paul and Mark,

I wonder if you have any idea how many listeners depend on you to feed us with the great Christian programming that you provide. I'm one of the single, elderly that lives alone, but I don't have to "be alone" as long as I can turn on 93.9 FM. I can always find a friendly voice there. And also nice music. My radio in my little apartment is in my kitchen and the Bible is on the table. It is opened often as I listen to the preachers and speakers directing us to scriptures. My place is full of little slips of paper (and notebooks) full of web site addresses, phone numbers, program names, books to order, and times to hear special programs. I enjoy every program you provide, even the programs directed to children. I have many children and grand and great-grandchildren. I often hear on your station messages that relate to someone in my family. I order books, CD's, etc for them.

I visit a young man at Putnamville Correctional Facility (near Greencastle). Last week I sat in the parking lot and ran through all the FM stations. Your station 93.9 FM was the only Christian station that had reception at the State prison. Denny says he does listen to it and it is helping him deal with being locked up for a long period of time. When I visit him we use the Bibles they have available and we review, talk about, and read what he has heard in your programs. We read the Bible together and he asks me to pray before our visiting time is up. I can only visit for two hours every two weeks, but he can get your programming all the time. What a blessing from God this station is providing.

Perhaps this information will be helpful in addressing the problem of the Indianapolis area station wanting to restrict your programming coverage area. The prisoners desperately need Christian programming! There are plenty of stations providing entertainment, but what is essential to the prisoners is Christian programming to give them hope and a way to salvation.

Sincerely, Pat Creasey (pcreaseyfl@aol.com)



P.S. Your programs help me with problems that are happening in my large family. For example, yesterday's Midday Connection offered a book about why it's a bad idea to live together before marriage. The book "Living Together before Marriage" is just what I've been looking for to give to my granddaughter who lives in Florida. So many of today's youth have had poor role models and the problems pass on down to the next generation. I've been wanting to address this with my granddaughter. With this book, I can open the door to talking to her about how dangerous and destructive cohabitation is to the future family she may choose to have. The college age adults seem to be caught up in this situation the most. Again, thank you for being on the air for us. Keep up the good work. I love you all. Pat

*Pat Casey - pcreasnyfl@aol.com
(812) 244-0465*

APRIL 8, 2005 10:09AM

My name is Regina Overpeck and I reside in Rockville, Indiana. I am a born again Christian and listen to Christian radio on a daily basis. Rockville seems to be a "hole" for receiving transmission, so I have listened to several stations, depending on weather, travel range, etc.. I am writing to express my desire that WPFR and the Word Power Family of stations be allowed to maintain the frequency and transmission range that they have. I have listened to the station that wants to take their place in our area. Although I do listen to Contemporary Christian music and appreciate it, I also like hymns, Gospel, instrumental, etc. WPFR does a bit of music, but there is a uniqueness that Paul and Eleanor bring to radio. I must admit that when I first began listening about 3 years ago, I heard their morning program and thought "these people are really behind the times". Something (or more correctly, someone) continued to draw me back. I appreciated the innocence and the accountability that they exuded in their morning discussions. I came to enjoy the group of area men that answered questions and had bible studies on the air. In a world where radio is pretty mindless, it was good "brain exercise" for this follower of Christ. They provide the Moody radio programming to this area day and night and I believe that the Fords try to reach every age group, even when it's not their personal preference. I have nothing against the other station or other stations in the surrounding area. There are times when I want music and listen to K-LOVE or WBGL, but I am always drawn back to where God's word is taught and exemplified by the people given stewardship of a radio station...and WPFR is certainly doing that. I have heard letters read from truck drivers, prisoners, shut-ins and the elderly, rejoicing at how God used WPFR to change hearts and lives. I have three teenagers in my home and they enjoy the discussions on the way to school and as they ready themselves in the morning as WPFR is on in the kitchen each day. Although at first, they would rather have listened to "tunes", hearing the WPFR daily topics opens opportunity for discussion in our home, keeping a thirst for God's word and His knowledge in front of us. A few weeks ago, Paul Ford was on alone in the morning (Eleanor was "sleeping a bit late") My son Michael came down for breakfast and after 5 minutes or so said "Wonder where Eleanor is today!". They are listening!!!

I leave this last thought...A radio station whose mission is first and foremost to preach and teach the Gospel is unique and maybe not as popular in today's culture. But this fact alone should be an grounds to allow them to keep their range of opportunity in bringing people to a saving knowledge of Christ and discipling followers. We should encourage these Godly stewards in their mission and ministry. 2 Corinthians 5:9 says "Therefore also, we have as our ambition, whether at home or absent, to be pleasing to Him". I would challenge you to make your decision with this in mind.

Sincerely,
Regina Overpeck
2760 S Walker Ramp Road
Rockville, IN 47872

Paul & Eleanor Ford

3/13/05

WAFB Radio

Dennison Oh

Dear Paul & Eleanor,

I am writing this letter to let you know that my wife, son and I really enjoy listening to your radio station, and we don't want your stations to be shut down. We live in Greencastle, Indiana and your station is the one that we listen to on my way to work in Ferris Hote in the morning. My wife and son listen to your station while doing their paper routes. They like listening to the Sugar Creek gang, and stories of Great Christians. I listen on my way home as well. We also like listen to Adventures in Odyssey, Down by the Riverside, and Money matters. We are praying that your station will remain on the air, we don't care for those contemporary radio stations. Your station is the only one in the area that is worth listening to.

Remembering You In our Prayers

David Thomas Sr, Charlotte, and

David Thomas Jr

3/19/05

Dearest Radio Family, Paul, Mark + Eleanor

Thank you so very much for your faithfulness in serving our God, with your daily Broadcast it is such a Blessing to me to be able to listen to the Truth on your station. I listen to your station daily on my way to and from work, I enjoy morning Bible study with the pastors while I slurp/sip my coffee with you all. I enjoy everyone on your station from Ranny Bucket to Dr Charles Stanley. I got saved gave my life to Christ around 5 years ago, when I discovered your station WPCR Fm 93.9 it helped me in my walk, it fed me spiritual food that I needed and still need on a daily basis, along with prayer and time in Gods Holy word. If this letter could be of any help to keep 93.9 on the air without any interference please use it. My listening area is from North 59 near Mansfield to Terra Haute

I hope and Pray that God will grant this prayer and he will continue to use your stations to bless many more that are hungry who need to hear Gods word through the Spirit + Truth. So May God Bless you and may your Heavenly Rewards be many. Amen
In Christ's Love, your Sister who loves you

Thank you again,
Tammy Callahan



March 27, 2005
(93.9 FM) (Brazil and east)

We are devoted listeners to the radio station WPFR of the Terre Haute, Indiana area. This station offers so many uplifting and fulfilling programs such as "Insight for Living", "Learning to Win", "Break Point" "Grace to You" and "Truth for Life" as well as various local speakers. These programs are well received and many people look to the broadcast of these programs to help them in their Christian walk of faith in today's world. They all teach God's Word in such a truthful and convicting manner.

We understand that there may be a chance that this station's broadcast waves will not be within our listening area due to some changes in ownership/management. We, the undersigned, would like to state that we do not want to lose the programs and format that WPFR now offers to us in our listening area.

Name	Address
Mark Mullins	3140 E CO Rd. 1300 N. BRAZIL IN 47834
Steve Frederick	4378 E Co Rd 1000 N BRAZIL, IN
Rick Thomas	3597 SCR 900W Brazil IN 47834
STEVE REINDOHL	Steve Rensell 4318 E Co Rd 1000 N
NANCY REINDOHL	Nancy Rensell 4318 E. Co Rd 1000 N
Alan Bell	4346 E Co Rd 1000 N
Kenny Thomas	2090 ECRd 600 N Brazil IN 47834
Marquet Thomas	12927 N.P.R. 385 E Brazil, IN 47834
Champ Galloway	3662 E Co Rd 1400 N
Judy Allen	3602 E. Co. Rd. 1400 N Brazil, IN 47834
Randy Thomas	12927 N.P.R. 385 E BRAZIL, IN 47834
Carl Cole	6767 N St. Rd. 55 Brazil IN 47834
Winifred Allen	3590 E Co R 1400 N Brazil, IN 47834
Cathy Mullins	3740 E Co Rd 1300 N Brazil In. 47834
Dede Witty	12852 N. LENARD BRAZIL IN 47834
DALE Witty	12852 N. LENARD. BRAZIL IN 47834
Mallory Kirchner	8895 N. Cty. Rd. 650 W Brazil, IN 47834
Vilsey Smith	5939 W. Cty Rd 900 N Brazil, IN 47834
Madison Kirchner	8895 N. Cty. Rd 650 W. Brazil, IN 47834
Abby Smith	5939 W. Cty Rd 900 N Brazil IN 47834
James Hyde	208025, 2045 East Jackson Brazil Indiana 47834
Lotha Kuehn	7790 W Co Rd 1500 W Brazil, IN 47834
Andrew Thomas	30 W Pinckney St Brazil IN 47834
Bertie Thomas	3597 S.C. Rd. 900 W Brazil In 47834
Carrie Rowan	713 N Alabama St Brazil, IN 47834
Nancy K. Thomas	381 N. Chicago Ave. Brazil, In. 47834
David Thomas	321 N CHICAGO AVE BRAZIL, IN 47834
Jan Allen	1515 W. Co. Rd. 600 N.
Wendy Allen	1515 W. Co. Rd. 600 N.
Kerch Kittle	RR 2 Box 955 road 1012
Harold Haddon	5587 340 St. Rd. West Brazil, In. 47834
Leona M Haddon	5587 340 St Rd West Brazil IN 47834
John Burch	6446 W. ST RD 340 Brazil In 47834
Ky L. Lewis	8160 N. C.R. 300W BRAZIL, IN 47834

March 27, 2005

We are devoted listeners to the radio station WPFR (93.9 FM) of the Brazil area which is 25 miles east of Terre Haute, Indiana. This station offers so many uplifting and fulfilling programs such as "Insight for Living", "Learning to Win", "Break Point" "Grace to You" and "Truth for Life" as well as various local speakers. These programs are well received and many people look to the broadcast of these programs to help them in their Christian walk of faith in today's world. They all teach God's Word in such a truthful and convicting manner.

We understand that there may be a chance that this station's broadcast waves will not be within our listening area due to some changes in ownership/management. We, the undersigned, would like to state that we do not want to lose the programs and format that WPFR now offers to us in our listening area.

Name	Address
Cornie Medema	4315 E. Co. Rd. 100 N. Brazil IN 47834
Edna	8887 W. 1000 S. CARLSVILLE, IN 46011
Opal	"
Paul Messner	1474 N. St. Rd 59 Brazil In. 47834
Ray Egan	2876 W CR 1350 N Brazil, IN 47834
Sheryl Egbert	"
Emilia Mullinix	3740 E Co Rd 1300 N BRAZIL, IN 47834
Olivia	"
Brenda Grace	"
Simon Thompson	"
Sally Downey	9560 N. CR 400 E. Brazil, IN. 47834
Jordan Sprueh	8872 Stirrup Ct. Indianapolis, IN 46256
Jarvis Willson	2538 Brewster Rd Indianapolis, IN 46268
Amy Kovan	8160 N Cold 300 W Brazil In 47834
Jan Reinold	20 N Leavitt St Brazil IN 47834
Leona Reinold	"
Courtney Jensen	11491 N. Lena Rd. Brazil, IN 47834
Micah Simons	570 W. Co. Rd. 700 N. Brazil, In 47834
2- Louis Gray Thompson	8676 S 550 E. Carbon, In 47837
Ernest C. Smith	927 North Washington Brazil 47834-1261
Philoma Micosop	10508 N. Co Rd. 100 E BRAZIL IN 47834
2- Jack Duane Hooker	8198 S. 550 E. Carbon, In 47837
Brandy Hooker	8198 S. 550 E. Carbon, IN 47837
Alex Smith	5939 W. Co Rd 900 N Brazil, In 47834
Kenneth J. Smith	"
Donna Kuchny	8895 N. Co. Rd. 650 WEST, BRAZIL, IN 47834
Barbara Carter	3677 E. CR 800 N Brazil, IN. 47834
Don Reese	6073 NCR 200 E BRAZIL IN 47834
Garrett Cammack	4637 S. Meridian Lane Rd Cloverdale IN
Theresa Thomas	14546 N. Lena rd Brazil In. 47834
Alana Sutherland	2067 E Cold 350 S GreenCastle
Donna Reinold & Leona Reinold	10557 E 1000 S BRAZIL, IN 47834

March 27, 2005

We are devoted listeners to the radio station WPRR (93.9 FM) of the Brazil area

which is 25 miles east of Terre Haute, Indiana. This station offers so many uplifting

and fulfilling programs such as "Insight for Living", "Learning to Win", "Break Point"

"Grace to You" and "Truth for Life" as well as various local speakers. These programs

are well received and many people look to the broadcast of these programs to help

them in their Christian walk of faith in today's world. They all teach God's Word in such

a truthful and convicting manner.

We understand that there may be a chance that this station's broadcast waves will

not be within our listening area due to some changes in ownership/management. We, the

undersigned, would like to state that we do not want to lose the programs and format that

WPRR now offers to us in our listening area.

Name

Address

10118 N. Cold Spring Brook, Brazil, IN

N. Cold Spring Brook

926 E. Grant St. 203, Brazil, IN

2951 W. State St. 210, Brazil, IN

2951 W. State St. 210, Brazil, IN

3443 S. CR 900 W. Brazil, IN

5401 W. CR 275 S. Greencastle, IN

595 Stearnsonville, Logansville, IN

1707 E. US Hwy 40, Brazil, IN

1707 E. US Hwy 40, Brazil, IN

4093 S. CR 825 W. Kokomo, IN

11378 N. CR 300 E. Brazil, IN 47834

11372 N. CR 300 E. Brazil, IN 47834

955 Jefferson Valley, Logansville, IN 47121

11378 N. CR 300 E. Brazil, IN 47834

419 Dogwood Way, Logansville, IN 47121

9637 S. Newburg Rd, Logansville, IN 47121

5613 E. Newburg Rd, Logansville, IN 47121

112. State University, Logansville, IN 47121

205 N. Mount St. Logansville, IN 47121

3713 E. Newburg Rd, Logansville, IN 47121

10814 E. 3rd St. Brazil, IN 47834

10814 E. 3rd St. Brazil, IN 47834

John Coy

page 1
To the servants of Christ, Paul + Eleanor Ford

Your Christian Radio Stations brings the light to a dark world. The Stations is an encouragement to those who feel let down. The Stations bring comfort thru the Lord's words, that we are never alone. He has promised to always be with us, and when we go through deep water we will not be overtaken. Jesus guides & directs us.

The Stations are heard by the Lost + Prodigals. The Stations bring help to the lost-telling them Jesus loves them so much he died for them, & as the thief on the cross they can be forgiven & saved. They Turn their life over to accept Jesus. The Stations tell the prodigals to come back home to Jesus - to love & forgive them. It is written: "There is no other name under heaven by which we can be saved."

How can we be saved? Not by works, but by the grace of our Lord Jesus Christ.

page 2

It is also written "Let the one who comes to me & forbids them not to come to me - I will receive them."

Let the Stations surround the prodigal - then whoever is responsible for closing them is accountable to God. Don't they want that burden on themselves? It would be better for them to have a mill stone around their neck & to be tossed into the sea. It is also written that

when the prodigal was being told - "Thou shalt not go out speaking" - they replied "If we do not speak out the stones will cry out."

In the Name of Jesus we must do whatever it takes to help keep the prodigal from going to the hell of sinners to the Cross. Our God is a merciful God. He can move the mountains & the seas. He is a God of power.

In His Service, Frances Kemper

The Fords,

Keep Up The Godly
Work. You are both a pleasure
to listen to in the AM.

I Listen to 93.9 Daily to & From
Indy along I-70, East of Brazil.
I hope it (the signal) continues.

Shawn K. Henderson
Tewe Haute, IN.

Subject: WWW Form Submission
From: nobody@fridge.rrl.net
Date: Tue, 29 Mar 2005 09:56:29 -0600 (CST)
To: wkzi@rrl.net

Below is the result of your feedback form. It was submitted by
() on Tuesday, March 29, 2005 at 09:58:17

FormsEditField1: Wendy R. Farrell

FormsEditField2:

FormsMultiLine2: Hello to you all,

My name is Wendy Farrell, and I live in Brazil, IN. I have been meaning to write to you to express to you how much I depend on your radio station. I am a single mother of three, I work 25-30 hours a week and I also am a full time student. So finding time to get into God's word is really hard for me. I have about a 40 minute drive to school and 40 minutes back home three days a week, so I take advantage of the time in my car and turn on my radio and get fed. I also drive to Plainfield twice every other weekend to meet my ex-husband and I am able to listen until about halfway. I rarely turn off your station. I work in a daycare and when I am in with the infants I turn your station on and the babies all seem to sleep better and I get my fill for the day. If that other radio station is allowed to come in and take over the side waves, I will lose and terribly miss all that your station offers to those of us who so long for meaningful and fulfilling time in the Word. I pray for God take care of this for us and His will be done.

Thank you so much for your faithfulness to the Lord and providing people like me much needed nourishment.

Sincerely,

Wendy R. Farrell

FormsButton1: [Click here to submit form](#)

Got a note to us here ~~XXXXXX~~

Dear Paul + Eleanor,

Hello again, Hope
your doing well. I've
written before and just
wanted to write back to
let you know that I am
praying ^{for} you and the
situation dealing with the
airwave take over from
Indianapolis. I am still
listening in my Fed EX
truck on my way to Dayton
OH, every night and on my
way home to Terre Haute
Every morning. I know when
I tune in around 7:00 am
just west of Greencastle,
and I here Paul laughing.
I'm almost home.

Thank you for being there.

Keep up the good work, ☉

GOD willing things will
work out in your favor.

Nevertheless He's in control.

Your Brother
in Christ,

Quinn

Subject: In support of radio continuation
From: Rachel Cherry <rcherry@millerwhite.com>
Date: Tue, 12 Apr 2005 09:00:29 -0500
To: <wpfr@abcs.com>
CC: <wkzi@rr1.net>

Paul and Eleanor,
I look forward to listening to your show each morning. I am a daily listener, but the morning show is my favorite. Thank you for all you do.
I live in Greencastle, IN and work in Terre Haute. Greencastle is approximately 30 miles west and slightly north of Terre Haute. Each morning I set out on highway 40 and turn on your station. However, for the first 8 miles or so I do not get very good reception. I still listen! How wonderful it would be to hear all your inspirations loud and clear each day. Better yet, if you are to boost power at the stations, I could receive the signal at home to share with my family! That would truly be a blessing!

God be with you in this process,
Rachel Cherry, Greencastle IN

April 8, 2005

Dear Paul and Eleanor,

I listen to WPFR-FM each morning as I get ready for work. I listen on my 45 minute ride to and from work, too. It is always on when I'm in my car.

When you were off the air because of equipment problems a couple weeks ago, I really missed not having the joyous music, uplifting instruction and good clean humor I am used to having on a daily basis. As I was driving to work, I searched the air waves for something decent to listen to, but found nothing. I finally ended up on a Catholic station. I didn't understand much of it, but I was at least getting some of God's word.

I knew I loved WPFR-FM, but did not know how much I depend on it daily until the morning it was off the air. I then realized what a loss it would be in my life to be without the programming God provides through your ministry. Your station is a one of a kind in my area.

It is my prayer the FCC will not make the proposed changes the Indianapolis station is requesting. If I lose the ability to receive your station in my home and car, I will have no need for a radio in either.

ATTN FCC:

Please realize that WPFR-FM is a one of a kind station in my listening area. There are many, many stations that broadcast the same drivel offered by the Indianapolis station. Please, please don't cave in and allow WPFR-FM to be taken from those of us who depend on it for daily inspiration, uplifting of the spirit and instruction.

Thank you for taking the time to consider my petition on behalf of WPFR-FM.



Judy Baldwin
7021 West Co. Rd. 725 South, Lot 14
Reelsville, Indiana 46172
765-672-4436

**WILLIAM AND MARY LOIS NARDINI
1980 WEST OAK GROVE DRIVE
TERRE HAUTE, IN 47802-9703**

April 11, 2005

To: Federal Communications Commission
From: William Nardini, Ph.D. and Mary Lois Nardini, Ph.D.

Greetings,

We hope you take the sentiments expressed in this letter seriously for we are frankly sick and tired of big money and big government taking away what small entrepreneurs have worked hard to develop. The case in point is the threat of WISG in Fishers, IN to be given the reception area west of Indianapolis to Brazil, IN. Much of this area, including Putnamville is now serviced by WPFR-FM (Clinton, IN). This power grab is not simply unfair; it is an outrage! You will not only demolish the outreach of an exceptional station owned by a talented, dedicated and professional couple, Paul and Eleanor Ford, who work daily and take no salaries, but you will also deprive a large area of listeners to WPFR-FM.

We believe we are representative of a large and growing body of people fed up with the filth in the media, especially television. Now we know the major news networks are not merely slanted in their presentations; they are untruthful! Radio is also awash with garbage at this point in time. Has the FCC done anything to improve the dismal offerings in media or enforce programming rules? Sadly, we believe not.

WPFR-FM is our safe harbor from the unhealthy storm to be seen and heard. It is here that we know we will hear the truth, listen to a full day of informative and stimulating programs, hear national news absent of bias, and enjoy down-to-earth conversations with Paul and Eleanor and their guests from 6 to 9 a.m. Each morning brings new delights to enjoy and topics to ponder.

We fail to understand why the FCC would even consider this injustice to a true light in the darkness of media unless you, along with other powerful groups, are bent on destroying America. Justice would be the extension of power to this station with a proven track record of excellent programming.

Thank you for your attention.

Sincerely,

William & Mary Lois Nardini

Subject: Letter of Support
From: "Sinders, Jill" <jill.sinders@spcorp.com>
Date: Wed, 13 Apr 2005 09:31:44 -0400
To: "wkzi@rr1.net" <wkzi@rr1.net>

Paul & Eleanor,

I am writing in response to your request for letters from the Brazil area. I listen to your programs on 93.9 every day. Your heart and spirit are greatly appreciated!! I hope and pray you win the battle with the Indianapolis.

Please continue to run the Moody Bible programs. I especially enjoy Joseph Stowell, Alister Begg, Adventures in Odyssey (which I have grown up listening to and still enjoy), Down Gilead Lane, The Pond, and the many other programs throughout the week! Please reconsider running Dr. Dobson's program.

I would like to hear a study on what the Bible says about church membership and baptism/communion. Our church has a new pastor and he says I need to be baptized again (which would make the 3rd time for me) in order to become a member because I wasn't baptized in a Baptist church.

Thank you for the work of your heart. Please continue to run the programs that only you are running in this area!! I appreciate that you don't do the "share-a-thons" like other stations - I weary of people asking for money. I will send a donation soon to help with your mission. Please add me to your newsletter. Thanks again and I'll keep you in my prayers!

God Bless,

Jill Sindere
5160 W. PR 865 N.
Brazil, IN

This message and any attachments are solely for the intended recipient. If you are not the intended recipient, disclosure, copying, use or distribution of the information included in this message is prohibited -- Please immediately and permanently delete.

EXHIBIT 3

Table DP-1. Profile of General Demographic Characteristics: 2000

Geographic Area: Lawrence city, Indiana

[For information on confidentiality protection, nonsampling error, and definitions, see text]

Subject	Number	Percent	Subject	Number	Percent
Total population	38,915	100.0	HISPANIC OR LATINO AND RACE		
SEX AND AGE			Total population	38,915	100.0
Male.....	18,978	48.8	Hispanic or Latino (of any race).....	1,840	4.7
Female.....	19,937	51.2	Mexican.....	1,213	3.1
Under 5 years.....	3,524	9.1	Puerto Rican.....	164	0.4
5 to 9 years.....	3,460	8.9	Cuban.....	32	0.1
10 to 14 years.....	3,062	7.9	Other Hispanic or Latino.....	431	1.1
15 to 19 years.....	2,505	6.4	Not Hispanic or Latino.....	37,075	95.3
20 to 24 years.....	2,090	5.4	White alone.....	29,559	76.0
25 to 34 years.....	6,716	17.3	RELATIONSHIP		
35 to 44 years.....	7,356	18.9	Total population	38,915	100.0
45 to 54 years.....	4,608	11.8	In households.....	38,629	99.3
55 to 59 years.....	1,353	3.5	Householder.....	14,853	38.2
60 to 64 years.....	1,044	2.7	Spouse.....	7,740	19.9
65 to 74 years.....	1,767	4.5	Child.....	12,686	32.6
75 to 84 years.....	1,060	2.7	Own child under 18 years.....	10,795	27.7
85 years and over.....	370	1.0	Other relatives.....	1,545	4.0
Median age (years).....	32.4	(X)	Under 18 years.....	630	1.6
18 years and over.....	27,261	70.1	Nonrelatives.....	1,805	4.6
Male.....	13,013	33.4	Unmarried partner.....	913	2.3
Female.....	14,248	36.6	In group quarters.....	286	0.7
21 years and over.....	25,949	66.7	Institutionalized population.....	263	0.7
62 years and over.....	3,813	9.8	Noninstitutionalized population.....	23	0.1
65 years and over.....	3,197	8.2	HOUSEHOLD BY TYPE		
Male.....	1,308	3.4	Total households	14,853	100.0
Female.....	1,889	4.9	Family households (families).....	10,332	69.6
RACE			With own children under 18 years.....	5,916	39.8
One race.....	38,186	98.1	Married-couple family.....	7,740	52.1
White.....	30,581	78.6	With own children under 18 years.....	4,192	28.2
Black or African American.....	6,036	15.5	Female householder, no husband present.....	1,937	13.0
American Indian and Alaska Native.....	117	0.3	With own children under 18 years.....	1,346	9.1
Asian.....	699	1.8	Nonfamily households.....	4,521	30.4
Asian Indian.....	71	0.2	Householder living alone.....	3,682	24.8
Chinese.....	78	0.2	Householder 65 years and over.....	880	5.9
Filipino.....	88	0.2	Households with individuals under 18 years.....	6,354	42.8
Japanese.....	56	0.1	Households with individuals 65 years and over.....	2,217	14.9
Korean.....	279	0.7	Average household size.....	2.60	(X)
Vietnamese.....	68	0.2	Average family size.....	3.13	(X)
Other Asian ¹	59	0.2	HOUSING OCCUPANCY		
Native Hawaiian and Other Pacific Islander.....	30	0.1	Total housing units	16,292	100.0
Native Hawaiian.....	13	-	Occupied housing units.....	14,853	91.2
Guamanian or Chamorro.....	7	-	Vacant housing units.....	1,439	8.8
Samoan.....	8	-	For seasonal, recreational, or occasional use.....	53	0.3
Other Pacific Islander ²	2	-	Homeowner vacancy rate (percent).....	3.4	(X)
Some other race.....	723	1.9	Rental vacancy rate (percent).....	15.3	(X)
Two or more races.....	729	1.9	HOUSING TENURE		
Race alone or in combination with one or more other races: ³			Occupied housing units	14,853	100.0
White.....	31,214	80.2	Owner-occupied housing units.....	11,264	75.8
Black or African American.....	6,387	16.4	Renter-occupied housing units.....	3,589	24.2
American Indian and Alaska Native.....	280	0.7	Average household size of owner-occupied units.....	2.68	(X)
Asian.....	857	2.2	Average household size of renter-occupied units.....	2.37	(X)
Native Hawaiian and Other Pacific Islander.....	58	0.1			
Some other race.....	908	2.3			

- Represents zero or rounds to zero. (X) Not applicable.

¹ Other Asian alone, or two or more Asian categories.

² Other Pacific Islander alone, or two or more Native Hawaiian and Other Pacific Islander categories.

³ In combination with one or more of the other races listed. The six numbers may add to more than the total population and the six percentages may add to more than 100 percent because individuals may report more than one race.

Source: U.S. Census Bureau, Census 2000.

EXHIBIT 4

Table DP-1. Profile of General Demographic Characteristics: 2000

Geographic Area: Indianapolis city (balance), Indiana

[For information on confidentiality protection, nonsampling error, and definitions, see text]

Subject	Number	Percent	Subject	Number	Percent
Total population	781,870	100.0	HISPANIC OR LATINO AND RACE		
SEX AND AGE			Total population	781,870	100.0
Male.....	378,310	48.4	Hispanic or Latino (of any race).....	30,636	3.9
Female.....	403,560	51.6	Mexican.....	21,053	2.7
Under 5 years.....	57,523	7.4	Puerto Rican.....	1,904	0.2
5 to 9 years.....	57,020	7.3	Cuban.....	457	0.1
10 to 14 years.....	54,675	7.0	Other Hispanic or Latino.....	7,222	0.9
15 to 19 years.....	52,446	6.7	Not Hispanic or Latino.....	751,234	96.1
20 to 24 years.....	58,365	7.5	White alone.....	527,675	67.5
25 to 34 years.....	129,409	16.6	RELATIONSHIP		
35 to 44 years.....	127,782	16.3	Total population	781,870	100.0
45 to 54 years.....	99,336	12.7	In households.....	763,962	97.7
55 to 59 years.....	32,613	4.2	Householder.....	320,107	40.9
60 to 64 years.....	26,843	3.4	Spouse.....	129,907	16.6
65 to 74 years.....	45,358	5.8	Child.....	220,921	28.3
75 to 84 years.....	30,168	3.9	Own child under 18 years.....	175,671	22.5
85 years and over.....	10,332	1.3	Other relatives.....	41,457	5.3
Median age (years).....	33.5	(X)	Under 18 years.....	18,423	2.4
18 years and over.....	581,253	74.3	Nonrelatives.....	51,570	6.6
Male.....	275,703	35.3	Unmarried partner.....	22,120	2.8
Female.....	305,550	39.1	In group quarters.....	17,908	2.3
21 years and over.....	549,131	70.2	Institutionalized population.....	11,375	1.5
62 years and over.....	101,261	13.0	Noninstitutionalized population.....	6,533	0.8
65 years and over.....	85,858	11.0	HOUSEHOLD BY TYPE		
Male.....	33,495	4.3	Total households	320,107	100.0
Female.....	52,363	6.7	Family households (families).....	192,754	60.2
RACE			With own children under 18 years.....	95,534	29.8
One race.....	769,013	98.4	Married-couple family.....	129,907	40.6
White.....	540,212	69.1	With own children under 18 years.....	57,496	18.0
Black or African American.....	199,412	25.5	Female householder, no husband present.....	48,219	15.1
American Indian and Alaska Native.....	1,985	0.3	With own children under 18 years.....	30,184	9.4
Asian.....	11,161	1.4	Nonfamily households.....	127,353	39.8
Asian Indian.....	3,325	0.4	Householder living alone.....	102,493	32.0
Chinese.....	2,182	0.3	Householder 65 years and over.....	27,276	8.5
Filipino.....	1,452	0.2	Households with individuals under 18 years.....	106,651	33.3
Japanese.....	637	0.1	Households with individuals 65 years and over.....	62,116	19.4
Korean.....	1,107	0.1	Average household size.....	2.39	(X)
Vietnamese.....	1,101	0.1	Average family size.....	3.04	(X)
Other Asian ¹	1,357	0.2	HOUSING OCCUPANCY		
Native Hawaiian and Other Pacific Islander.....	322	-	Total housing units	352,429	100.0
Native Hawaiian.....	98	-	Occupied housing units.....	320,107	90.8
Guamanian or Chamorro.....	88	-	Vacant housing units.....	32,322	9.2
Samoan.....	45	-	For seasonal, recreational, or occasional use.....	1,196	0.3
Other Pacific Islander ²	91	-	Homeowner vacancy rate (percent).....	2.0	(X)
Some other race.....	15,921	2.0	Rental vacancy rate (percent).....	10.9	(X)
Two or more races.....	12,857	1.6	HOUSING TENURE		
Race alone or in combination with one or more other races: ³			Occupied housing units	320,107	100.0
White.....	550,768	70.4	Owner-occupied housing units.....	187,590	58.6
Black or African American.....	206,148	26.4	Renter-occupied housing units.....	132,517	41.4
American Indian and Alaska Native.....	5,277	0.7	Average household size of owner-occupied units.....	2.53	(X)
Asian.....	13,667	1.7	Average household size of renter-occupied units.....	2.18	(X)
Native Hawaiian and Other Pacific Islander.....	807	0.1			
Some other race.....	19,225	2.5			

- Represents zero or rounds to zero. (X) Not applicable.

¹ Other Asian alone, or two or more Asian categories.

² Other Pacific Islander alone, or two or more Native Hawaiian and Other Pacific Islander categories.

³ In combination with one or more of the other races listed. The six numbers may add to more than the total population and the six percentages may add to more than 100 percent because individuals may report more than one race.

Source: U.S. Census Bureau, Census 2000.

EXHIBIT 5

39889	Honolulu, HI	718182
40213	Hot Springs, AR	51763
40375	Houma, LA	125929
40429	Houston, TX	3822509
40753	Huntington, WV--KY--OH	177550
40780	Huntsville, AL	213253
40996	Idaho Falls, ID	66973
41212	Indianapolis, IN	1218919
41347	Indio--Cathedral City--Palm Springs, CA	254856
41590	Iowa City, IA	85247
41914	Ithaca, NY	53528
42157	Jackson, MI	88050
42211	Jackson, MS	292637
42265	Jackson, TN	65086
42346	Jacksonville, FL	882295
42400	Jacksonville, NC	95514
42562	Janesville, WI	66034
42967	Jefferson City, MO	53714
43210	Johnson City, TN	102456
43291	Johnstown, PA	76113
43345	Jonesboro, AR	51804
43399	Joplin, MO	72089
43453	Juana Diaz, PR	54835
43669	Kailua (Honolulu County)--Kaneohe, HI	117730
43723	Kalamazoo, MI	187961
43885	Kankakee, IL	65073
43912	Kansas City, MO--KS	1361744
44479	Kennewick--Richland, WA	153851
44506	Kenosha, WI	110942
44992	Killeen, TX	167976
45235	Kingsport, TN--VA	95766
45262	Kingston, NY	53458
45451	Kissimmee, FL	186667
45640	Knoxville, TN	419830
45694	Kokomo, IN	63739
45910	La Crosse, WI--MN	89966
45937	Lady Lake, FL	50721
46018	Lafayette, IN	125738
46045	Lafayette, LA	178079
46126	Lafayette--Louisville, CO	60387
46531	Lake Charles, LA	132977
46801	Lake Jackson--Angleton, TX	73416
46828	Lakeland, FL	199487
47530	Lancaster, PA	323554
47611	Lancaster--Palmdale, CA	263532
47719	Lansing, MI	300032
47854	Laredo, TX	175586
47935	Las Cruces, NM	104186
47962	Las Vegas, NV	1314357
48232	Lawrence, KS	79647
48394	Lawton, OK	89556
48664	Lebanon, PA	63681
48799	Leesburg--Eustis, FL	97497
48826	Lee's Summit, MO	55285
49096	Leominster--Fitchburg, MA	112943
49312	Lewiston, ID--WA	50317
49339	Lewiston, ME	50567
49582	Lexington-Fayette, KY	250994
49852	Lima, OH	74071
49933	Lincoln, NE	226582

EXHIBIT 6

EXHIBIT 7

P27. PLACE OF WORK FOR WORKERS 16 YEARS AND OVER--PLACE LEVEL [5] - Universe:

Workers 16 years and over

Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data

NOTE: Data based on a sample except in P3, P4, H3, and H4. For information on confidentiality protection, sampling error, nonsampling error, and definitions see <http://factfinder.census.gov/home/en/datanotes/expsf3.htm>.

	Lawrence city, Indiana
Total:	20,337
Living in a place:	20,337
Worked in place of residence	3,245
Worked outside place of residence	17,092
Not living in a place	0

U.S. Census Bureau
Census 2000

Standard Error/Variance documentation for this dataset:

Accuracy of the Data: Census 2000 Summary File 3 (SF 3) - Sample Data (PDF 141.5KB)

EXHIBIT 8



ZIP Code Lookup

All Cities/Towns in a ZIP Code™ Results

[New Search for ZIP C](#)

46226 is associated with the following Cities/Towns:

City	State	City/Town Status	ZIP Code Type
INDIANAPOLIS	IN	ACCEPTABLE (DEFAULT)	STANDARD
LAWRENCE	IN	ACCEPTABLE	STANDARD

[New Search for ZIP C](#)

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[Pickup Options](#)

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