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May 31, 2005

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Federal Communications Commission  
Office of Secretary

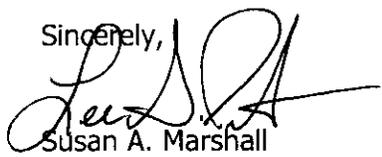
**VIA HAND DELIVERY**  
Marlene Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Counterproposal of Hall Communications, Inc. - MB Docket No. 05-162, RM-11227  
Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations  
Enfield, New Hampshire, Hartford and White River Junction, Vermont; and  
Keeseville and Morrisonville, New York

Dear Ms. Dortch:

Transmitted herewith is an original and four copies of the Counterproposal of Hall Communications, Inc., relating to the above-referenced proceeding.

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

Sincerely,  
  
Susan A. Marshall  
Lee G. Petro

Counsel for Hall Communications, Inc.

Enclosures

cc: As shown in Certificate of Service

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

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Federal Communications Commission  
Office of Secretary

**In the Matter of:** }  
 }  
**Amendment of Section 73.202(b)** }  
**Table of Allotments,** }  
**FM Broadcast Stations** }  
**(Enfield, New Hampshire, Hartford and** }  
**White River Junction, Vermont; and** }  
**Keeseville and Morrisonville, New York)** }

**MB Docket No. 05-162**  
**RM-11227**

**To: Office of the Secretary**  
**Attn: Assistant Chief, Audio Division, Media Bureau**

**COMMENTS AND COUNTERPROPOSAL OF**  
**HALL COMMUNICATIONS, INC.**

Hall Communications, Inc. ("Hall"), by and through its attorneys, and pursuant to Section 1.420 of the Commission's Rules, hereby submits these Comments and Counterproposal relating to the Petition for Rulemaking filed by Nassau Broadcasting III, L.L.C. ("Nassau"), on December 22, 2004 (the "Petition"). The Commission released a Notice of Proposed Rule Making on April 8, 2005, in response to the filing of the Petition.<sup>1</sup>

The Petition proposes several modifications to existing facilities that would result in (1) the reallocation of Station WWOD(FM) from Harford, Vermont, to Keeseville, New York; (2) the reallocation of Station WXLN(FM) from White River Junction, Vermont, to Hartford, Vermont; (3) the reallocation of the vacant Channel 231A allotment at Keeseville, New York, to Morrisonville, New York.; and (4) the allotment of a new FM channel at Enfield, New Hampshire.

<sup>1</sup> See *Enfield, New Hampshire; Harford and White River Junction, Vermont; and Keeseville and Morrisonville, New York*, Notice of Proposed Rule Making, 20 FCC Rcd 7587 (MB Bur. 2005)(the "NPRM"). The NPRM established May 31, 2005, as the deadline for submitting comments and/or Counterproposals relating to the Petition. Therefore, these Comments and Counterproposal are timely filed.

However, for the reasons discussed below, Nassau's Petition must be denied. Not only is the Petition deficient on its face, but it does not compare favorably against Hall's Counterproposal. Nassau's Petition to replace the vacant allotment at Keeseville, which was only recently allotted by the Commission and in which Hall has already submitted its expression of interest, flies in the face of the Commission's well-established policy of protecting allotments from modification or deletion when a third party has filed an expression of interest. Moreover, Nassau's Petition fails when compared to Hall's proposed allotment of a Class C3 facility at Morrisonville, coupled with the maintenance of WWOD and WXLF at their current communities and the vacant Class A facility on Channel 231 at Keeseville, resulting in the provision of a new FM service to substantially more people.

As such, Hall will show that the Commission must reject Nassau's Petition as deficient and adopt Hall's Counterproposal.

## **DISCUSSION**

### **A. Nassau's Petition Must Be Dismissed Or Denied For Failing To Conform With The Commission's Rules And Policies.**

The Commission requires proponents of an allotment of FM or TV channels to submit an expression of interest for that particular allotment.<sup>2</sup> The necessary corollary is also true --- namely, that the Commission will not delete an allotment when at least one party has expressed an interest in filing for and constructing facilities for the allotment.

The Commission established this policy to provide a certain level of consistency and certainty in the allotment process.<sup>3</sup> Specifically, the Commission has stated that:

One critical aspect of implementing the mandate of Section 307(b) of the Communications Act is to provide an efficient allotment system that affords prospective

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<sup>2</sup> See, e.g., *NPRM*, Appendix, ¶ 2.

<sup>3</sup> See *Montrose and Scranton, Pennsylvania*, Memorandum Opinion and Order, 5 FCC Rcd 6305, ¶ 9 (1995)(citing *Snow Hill and Kinston, North Carolina*, 55 FCC 2d 769 (1975)).

applicants reasonable certainty and administrative finality in seeking to initiate service. ***In short, the 'fair distribution' of service analysis which underlay the original allotment decision should not be disturbed where an active interest in providing service exists.***<sup>4</sup>

While the Commission may consider a proposal to delete an allotment for which an expression of interest had been provided, the party proffering the proposal bears a heavy burden to demonstrate extraordinary circumstances supporting such an action.<sup>5</sup> In fact, the Commission has stated that the deletion of an allotment merely to deliver a first local service to another community "standing alone, is not a compelling reason" where an interest has already been expressed.<sup>6</sup> This is especially true where, as the Commission found in *Montrose and Scranton*, there is no replacement channel for the community that would lose the vacant allotment.<sup>7</sup>

As noted above, Hall expressed its interest in the allotment for a new FM channel at Keeseville in both its Counterproposal and in its Reply Comments<sup>8</sup> in the proceeding that resulted in the 2004 allotment of Channel 231A at Keeseville (the "Keeseville I" proceeding).<sup>9</sup> Even a cursory review of the record of *Keeseville I* by an uninvolved party would reveal Hall's strong interest in the Channel 231A Keeseville allotment.

However, Nassau is not an uninvolved party. Rather, Nassau acquired WWOD and WXLF from the stations' former licensees who had filed the initial proposal in *Keeseville I*. Moreover, by the terms of the purchase agreements whereby Nassau acquired WWOD and

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<sup>4</sup> *Montrose and Scranton, Pennsylvania*, supra note 3 (emphasis added).

<sup>5</sup> *Id.* See also *Billings and Lewistown, Montana*, Memorandum Opinion and Order, 11 FCC Rcd 8560, ¶ 2 (1996).

<sup>6</sup> *Billings and Lewistown, Montana*, at ¶ 5.

<sup>7</sup> *Montrose and Scranton*, at ¶ 9.

<sup>8</sup> See *Counterproposal of Hall Communications, Inc.*, MM Docket 02-23, filed April 1, 2002. See also *Reply Comments of Hall Communications, Inc.*, MM Docket 02-23, filed September 20, 2002.

<sup>9</sup> See *Keeseville, New York, Hartford and White River Junction, Vermont*, Report and Order, 19 FCC Rcd 16,106 (MB Bur. 2004).

WXLF, Nassau would have been required to pay the former licensees an additional three million dollars (\$3,000,000) if, in *Keeseville I*, Station WWOD had been re-allotted to Keeseville.<sup>10</sup>

Therefore, not only was Nassau clearly aware of Hall's interest in the Channel 231A Keeseville allotment when it filed its Petition, but it is clear that Nassau's filing of the Petition is an attempt to re-write history and undermine the Commission's reasoned decisions made in *Keeseville I*.

Specifically, Nassau is asking the Commission to delete the Channel 231A allotment at Keeseville and, instead, move the allotment to Morrisonville. Thus, rather than there being a vacant allotment at Keeseville for which Hall and the public could apply, as Hall has said it would, Nassau would reallocate Channel 282C3 to Keeseville for Station WWOD for Nassau's own use. This situation is exacerbated by the fact that Section 1.420(i) of the Commission's rules specifically prohibits competing expressions of interest for Nassau's Channel 282C3 re-allotment at Keeseville.

As discussed in the Engineering Report of Munn-Reese, Inc., attached hereto as Exhibit A (the "Engineering Report"), in the context of Nassau's proposal, there is no other vacant channel that could be allotted to Keeseville, and no party, including Hall, would ever have the opportunity to compete in an auction for the Keeseville allotment if Nassau's proposal is granted.

Moreover Nassau has failed to provide any basis for undermining the Commission's *Keeseville I* decision that (i) Keeseville was entitled to a first local service that would be available for public application, and (ii) with the Keeseville allotment, that WWOD and WXFL should remain in their respective communities. Not only has Nassau completely ignored these two determinations, but it has also failed to provide any extraordinary circumstances that would support rejection of these decisions.

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<sup>10</sup> See Section 2.1(b) of the Asset Purchase Agreement, dated March 9, 2004, filed to the Commission as part of the assignment application in File No. BALH-200330AHU).

In *Keeseville I*, the Commission clearly concluded that it was in the public interest to “maintain a first local service on a higher class channel at Hartford.”<sup>11</sup> Nevertheless, Nassau is proposing again to move the existing Class C3 allotment out of Hartford and to replace it with a lower Class A allotment from White River Junction. Nassau fails to address why, only one year after its decision in *Keeseville I*, the Commission should find that there has been sufficient change in the public interest benefits to accept what it previously clearly rejected.

Moreover, in *Keeseville I*, the Commission concluded that the “public interest is better served by maintaining a second local and first nighttime service at the larger community of White River Junction (population 2,569 persons)...[and that]...the retention of the original community’s first competitive and first nighttime service [at White River Junction] outweighs the [Keeseville]’s need for a first competitive or second local service.”<sup>12</sup> Nevertheless, Nassau proposes to move the only nighttime service out of White River Junction so that it can move its own Class C3 facility into the Burlington market. Again, Nassau’s Petition fails to justify why the Commission should reject what it only recently clearly determined in *Keeseville I*.

It is clear, therefore, that Nassau’s Petition is an attempt to re-write the reasoned decisions reached in *Keeseville I*, and permit another bite at the apple to move the more powerful Class C3 facility from Hartford into the Burlington metro area. However, filing a second petition for rule making is the incorrect forum for such reconsideration. If Nassau, or its predecessors-in-interest, did not agree with the Commission’s *Keeseville I* determinations, they should have filed for reconsideration under Section 1.106 of the Commission’s rules. Instead, Nassau has opted to waste the Commission’s limited resources by submitting an almost identical rule making petition as filed in the earlier Keeseville proceeding.

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<sup>11</sup> *Keeseville I*, 19 FCC Rcd at 16,109.

<sup>12</sup> *Id.* (citing *Royston and Commerce Georgia*, 15 FCC Rcd 5676 (MMB 2000) and *Bay Springs, Ellisville, and Sandersville, Mississippi*, 14 FCC Rcd 21,339 (MMB 1999)).

Therefore, it is obvious that, under *Snow Hill* and its progeny, Nassau's Petition was defective as filed. In light of this fact, and Nassau's clear intent to eviscerate the Commission's determinations in *Keeseville I*, Nassau's Petition must be dismissed.

**B. Hall's Counterproposal Would Result In A Preferential Arrangement of Allotments.**

While it is clear from the discussion above that Nassau's Petition was defective and must be dismissed, Hall advances its Counterproposal that only 282C3 be dropped in to bring a new local FM service to Morrisonville. This Counterproposal would result in preferential arrangement of the FM allotments regardless of whether the Commission considers the defective proposals contained in Nassau's Petition.

As discussed in the attached Engineering Report, Class 282C3 can be allotted to Morrisonville, with no other changes made to the FM Table of Allotments. This means that under Hall's Counterproposal, both White River Junction and Hartford would continue to receive their respective WXLF and WWOD services. In addition, this Class C3 Morrisonville allotment would result in 183,465 persons receiving a new aural service. In fact, Hall's Counterproposal reflects a net gain of 55,831 persons over the proposals contained in Nassau's Petition. Moreover, Hall's Counterproposal would maintain the allotment of Channel 231A at Keeseville, which, with the Channel 282C3 Morrisonville allotment, would result in two vacant FM allotments available for public auction, thus serving the Commission's oft-stated goal of promoting diversity of voices in local communities.

**1. Continuing Service to White River Junction and Hartford**

By maintaining the current allotments at White River Junction and Hartford, no loss areas would be created. This is in sharp contrast to Nassau's proposal to move Station WWOD from Hartford to Keeseville and to re-allot Station WXLF from White River Junction to Hartford, which would result in the loss of service to 44,817 people.

In addition to the consideration of this substantial loss of service, the Media Bureau, as discussed above, has already determined in *Keeseville I* that a proposal which would result in the drop-in of a new channel, while maintaining service to Hartford and White River Junction, is in the public interest. In reviewing the same proposal in *Keeseville I* to move Station WWOD from Hartford to Keeseville, and to reallocate Station WXLFFM from White River Junction to Hartford, the Commission concluded that "maintaining the balance of the existing services [of WWOD and WXLFF] would best serve the public interest."<sup>13</sup> Consequently, it is clear, as stated in *Keeseville I*, that the Commission would prefer the delivery of first local services to new communities without the reallocation of existing services.

## **2. Comparison of First Local Service Proposals**

Perhaps in recognition of the failings of the proposals contained in the *Keeseville I* petition, Nassau has also included in its instant Petition a proposal to allocate Channel 282A at Enfield, New Hampshire. In doing so, however, Nassau has substantially overstated the population of the Enfield community. By considering the population of Enfield's densely populated area, rather than the township as proposed in Nassau's Petition, a picture of the community of Enfield can be determined.

According to the 2000 Census, there are two population groupings in New Hampshire with the name of Enfield. First, there is a "township" of Enfield,<sup>14</sup> with a population of 4,618 persons, which closely tracks the New England practice of including a large swath of area bearing "little resemblance to the extent of the actual urbanized area" of Enfield.<sup>15</sup> In addition,

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<sup>13</sup> *Keeseville I*, at ¶ 10.

<sup>14</sup> See U.S. Census Bureau – American Factfinder, Enfield Town, [www.factfinder.census.gov](http://www.factfinder.census.gov) (last visited May 24, 2005).

<sup>15</sup> See *Andy Valley Broadcasting System, Inc.*, 12 FCC 2d 3 (1968).

there is an Enfield census designated place (CDP), with a population of 1,698 persons,<sup>16</sup> which more accurately reflects "the urban portions of the town."<sup>17</sup> As is the practice in allotment proceedings in New England, the Commission will consider the "densely populated area within" the township to measure service to the community.<sup>18</sup> In light of the Commission's long-standing practice of considering the more urban areas of New England townships in allotment proceedings, the Nassau's proposal to deliver first local service to Enfield will result in only 1,698 persons receiving first local service, rather than the 4,618 persons cited by Nassau.<sup>19</sup>

In addition, Nassau proposes to allot a first local service to Morrisonville. Morrisonville is a CDP with a population of 1,702 persons. Hall does not dispute Nassau's showing demonstrating that Morrisonville is a community for allotment purposes. Indeed, Hall agrees with Nassau that Morrisonville is entitled to a first local service. However, rather than allot a Class A facility at Morrisonville, Hall proposes that a Class C3 facility be allotted to Morrisonville on Channel 282.

Therefore, a direct comparison of the first local services contained in Nassau's and Hall's proposals reflects that Hall's Counterproposal would better serve the public interest. Since both Nassau's Petition and this Counterproposal propose an allotment at Morrisonville, there is no comparative difference with respect to the Morrisonville community.<sup>20</sup> However, by accurately considering Enfield as a CDP, the number of persons receiving a first local service (1,698) is less

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<sup>16</sup> See *U.S. Census Bureau – American Factfinder*, Enfield CDP, [www.factfinder.census.gov](http://www.factfinder.census.gov) (last visited May 24, 2005).

<sup>17</sup> See *Bershire Broadcasting-South, Inc.*, 2 FCC Rcd 3226 (1987)(citing *Manchester Broadcasting Co.*, 24 FCC 199, 222 (1958)).

<sup>18</sup> See *Endwell and Southport, New York*, 5 FCC Rcd 1121 (MM Bur. 1990).

<sup>19</sup> See *Petition*, pg. 7.

<sup>20</sup> See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 91 (1988). The FM Allotment priorities are (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3).

than those that would receive a first local service by maintaining the vacant Channel 231A allotment at Keeseville (1,850 persons). As such, Hall's proposal to allot Channel 282C3 to Morrisonville and maintain the first local service Channel 231 allotment at Keeseville reflects a preferential arrangement of allotments.<sup>21</sup>

**C. Comparison of Gain and Loss of Service under the Proposals**

Finally, not only would the grant of Hall's Counterproposal result in a larger community receiving its first local service, Hall's Counterproposal would also result in a greater number of people receiving a new aural service without any resulting loss of service.

Specifically, as noted above, by moving Station WWOD(FM) from Hartford to Keeseville and re-allotting Channel 231A from Keeseville to Morrisonville as Nassau requests, over 44,000 persons will lose an aural service.<sup>22</sup> While there would be a gain in service for 172,451 people, the loss of more than 25% of this gain weighs heavily against making the proposed changes, not to mention the loss of the only local FM service at White River Junction, and the resulting reliance of that community on an AM station that must accept all interference during its nighttime service.<sup>23</sup>

On the other hand, Hall's proposed Channel 282C3 allotment at Morrisonville, coupled with the Channel 231A allotment at Keeseville and with the maintenance of WWOD and WXLN's current services, would result in 183,465 persons receiving a new aural service ***with no loss area***.<sup>24</sup> Moreover, Hall's proposed Class C3 facility at Morrisonville would result in a more

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<sup>21</sup> *Id.*

<sup>22</sup> *Engineering Exhibit*, pg. 3 (44,817 persons losing service).

<sup>23</sup> Station WNHV(AM), White River Junction, Vermont, operates on 910 kHz with one kilowatt daytime power and 84 watts at night. For allocation purposes, WNHV is considered to have Class D ("daytimer") status because its limited nighttime facilities are not protected from interference. *See* 47 C.F.R. § 73.21(a)(3)(2004).

<sup>24</sup> *Id.*

efficient use of the spectrum since the existing allotments at White River Junction and Hartford would continue to serve these communities, and the existing new allotment would be maintained at Keeseville.

### **CONCLUSION**

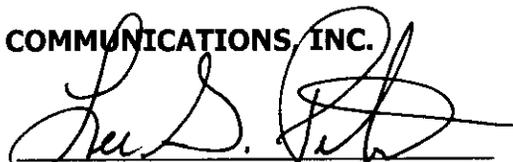
For the reasons set forth herein, the Commission must dismiss Nassau's Petition. First, the Petition is defective and contrary to Commission precedent. Since the Commission has consistently protected vacant channels where a party has proffered its expression of interest, the Petition is fatally defective and must be dismissed. Moreover, Hall's Counterproposal will result in a more preferential arrangement of allotments since no loss areas would be created, and a greater number of persons would receive a new local aural service. In addition, Hall hereby certifies that if its Counterproposal is approved and Channel 282C3 is allotted to Morrisonville, New York, it will file an application to participate in the auction for the channel, and, if it is the highest bidder, construct the facilities as authorized.

Therefore, Hall Communications, Inc., respectfully requests that the Commission dismiss the Petition for Rule Making filed by Nassau Broadcasting III, L.L.C., and grant Hall's Counterproposal.

Respectfully submitted,

**HALL COMMUNICATIONS, INC.**

By:



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Its Attorneys

May 31, 2005

**ENGINEERING REPORT  
IN SUPPORT OF A  
PETITION FOR A  
COUNTERPROPOSAL  
RULEMAKING**

**New Channel 282C3  
Morrisonville, NY**

**May 2005**

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**MUNN-REESE, INC.**  
Broadcast Engineering Consultants  
Coldwater, MI 49036

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# **CERTIFICATION OF ENGINEERS**

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The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, with offices at 385 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of such data errors or omissions.

The report has been prepared by properly trained electronics specialists under the direction of the undersigned whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

May 26, 2005

***MUNN-REESE, INC.***

By \_\_\_\_\_  
Wayne S. Reese, President

By \_\_\_\_\_  
Justin W. Asher, Project Engineer

385 Airport Drive, PO Box 220  
Coldwater, Michigan 49036

Telephone: 517-278-7339

***MUNN-REESE, INC.***  
Broadcast Engineering Consultants  
Coldwater, MI 49036

## **Discussion**

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The office of Munn-Reese, Inc. has been retained to prepare this engineering report for Hall Communications Inc. in support of a Counterproposal to amend the FM Table of Allotments found in 47 CFR §73.202(b). This Counterproposal is being filed in response to the Petition for Rule Making by Nassau Broadcasting III, L.L.C. in MB Docket 05-162 (RM-11227) (the "Petition").

The Petition proposes to reallocate Channel 282C3 from Hartford, VT to Keeseville, NY and license Station WWOD(FM) to operate on Channel 282C3 at Keeseville. Additionally, the Petition proposes to reallocate Channel 231A from Keeseville, NY to Morrisonville, NY; reallocate Channel 237A from White River Junction, VT to Hartford, VT, and license Station WXLFFM) to operate on Channel 237A at Hartford, VT. White River Junction will continue to be served by WNHV(AM). WNHV(AM) operates with 1.0 kW of protected daytime service and 0.084 kW of unprotected nighttime authorization. Finally the Petition proposes to add Channel 282A to Enfield, NH as a new service.

The Counterproposal requests that Channel 282C3 be allotted to Morrisonville, NY, along with maintaining the vacant Channel 231A allotment for Keeseville, NY. Channel 282C3 will be the first aural service for Morrisonville, while Channel 231A remains the first aural service for Keeseville. This Engineering Report demonstrates Morrisonville may be allocated a facility on Channel 282C3 without the need to move or reallocate any existing service. Since there are no other available channels to allot to Keeseville, the Counterproposal would maintain the Keeseville allotment so that it would remain available for new applicants in a future auction. In addition, this Counterproposal would not create any loss area.

The Petition provides support for the conclusion that Morrisonville, NY is a viable community with a U.S. Census 2000 population of 1,702. This Counterproposal does not

dispute the fact, therefore no further community showings are believed required for Morrisonville. The Petition also states that no white or gray areas will be served and the loss areas will create no underserved areas. While the Petition improperly demonstrated compliance by using both FCC predicted contours as opposed to standard reference arc circles and the inclusion of AM 5.0 mV/m daytime contours as opposed to AM nighttime RSS interference free contours, the conclusions reached in the Petition remain valid. Likewise the Counterproposal will also serve no white or gray areas. As the Counterproposal creates no loss area, underserved area is irrelevant.

The Petition states that Enfield, NH is a viable community with a U.S. Census 2000 population of 4,618 persons. However, as discussed in the Counterproposal, this statement is incorrect. Inspection of U.S. Census 2000 books show Enfield Town(ship) comprises a population of 4,618, while the actual Enfield community (CDP) is only comprised of 1,698 persons<sup>1</sup>. **Exhibit(s) 3a-b of Appendix I** are portions of U.S. Census 2000 Books for the Enfield, Grafton County, New Hampshire area. The Enfield community (CDP) is a separate defined entity within the Enfield Town(ship) by U.S. Census standards. **Exhibit(s) 3(c-d) of Appendix I** are population density and block centroid maps showing population distribution for Enfield Town(ship) and specifically the centralization of population in Enfield (CDP). As a result, populations for publicly available allotment communities are as follows:

Publicly Available Allotment Communities			
Petition		Counterproposal	
Community <sup>2</sup>	Population <sup>2</sup>	Community <sup>2</sup>	Population <sup>2</sup>
Morrisonville, NY (CDP)	1,702	Keeseville, NY (Village)	1,850
Enfield, NH (CDP)	1,698	Morrisonville, NY (CDP)	1,702

As stated before, the allotment of Channel 282C3 for Morrisonville, NY would result in a preferential arrangement of the allotments. A study was made of the Channel 282C3 allocation

<sup>1</sup> CDP refers to "Census Designated Place" or the U.S. Census designation for a communal grouping of people which is less than a town or village, but whom still identify themselves as a separate community.

<sup>2</sup> U.S. Census 2000 Datum

at Morrisonville, NY using a special reference point. This point is defined by the coordinates: 44° 43' 26" NL and 73° 43' 43" WL. Information regarding the availability of this site has been included in **Exhibit(s) 1.0 to 1.3**. The special reference point is located in the northwest corner of the Dannemora city limits as noted on the topographic map included in **Exhibit 1.0**. While Dannemora is located within the Adirondack State Park, the city itself is comprised of publicly and privately owned land with various portions zoned for all types activities consistent with any other typical city<sup>3</sup>. A USGS photograph of the site has been included in **Exhibit 1.1**. In addition to the special reference point area, other locations in the general vicinity appear to be viable transmitter site locations as well. Given the special reference point elevation of 472 meters AMSL, the center of radiation (COR) need only be 41 meters above ground level to achieve maximum Class C3 parameters of 25 kW at 100 meter HAAT. (Alternately, the Morrisonville, NY Channel 231A reference point specified in the Petition requires a COR of approximately 150 meters AGL at a location 2.1 km southwest of the Clinton County Airport.) Clear line of site from the Counterproposal location back to the FCC designated Morrisonville city reference coordinates of 44° 41' 34" NL by 73° 33' 45" WL has been included in **Exhibit 1.2**. 100% city coverage of Morrisonville may be accomplished by both the standard 23.2 km reference arc and the 70 dBu city coverage contour when taking into account protections towards Canada. City coverage has been included in **Exhibit 1.3**.

Using a currently updated secondary copy of the FCC database of FM broadcast stations, the Tabulation of Allocation Spacing found in **Exhibit 2.0** was developed. Inspection of this tabulation shows under the current rules, the proposed reference point meets all domestic spacing requirements. This allocation is short-spaced to five Canadian Allocations. However, all five Canadian Allocations operating at maximum facilities can be protected through the use of a directional antenna. **Exhibit 2.1** contains a map of the necessary protections

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<sup>3</sup> The special reference point has been classified as a "Hamlet". The Adirondack Park Defines a Hamlet as an area of growth and service center where the Agency encourages development. Intentionally the Agency has very limited permit requirements in hamlet areas.

towards these stations. No contour overlap is predicted to exist with any Canadian facility over Canadian soil. **Exhibit 2.2** is a plot and tabulation of the employed directional antenna. A 20 dB front to back ratio was employed pursuant to the US-Canada Bilateral Agreement Annex I–Rule 3.6.

For comparative purposes, the populations contained in the 60 dBu contours have been calculated based on the following methodology. Due to the suppressed radiation required to protect Canadian allotments, actual FCC contours taking into account the directional antenna pattern have been used in place of the mandatory coverage reference arcs. In addition, areas of received interference from Canadian facilities over domestic soil have been calculated and removed from the overall population figures. A total net gain population of 183,465 and area of 3,715.79 km<sup>2</sup> can be expected as a result of this Counterproposal.

It was noted, removal of received Canadian interference was not believed taken into account in the Petition, therefore these have been recalculated and included in **Appendix 1** of this showing. In addition, the Petition apparently used actual FCC contours for both allotments with suppressed radiations as well as full class non-directional allotments. As such, to provide a common foundation for comparison, proposed non-directional allotments have been recalculated in **Appendix 1** using reference arc distances. In all cases use of the proper population calculation techniques lowered the original Petition findings.

The following tables show both the original population calculations contained in the Petition, and the recalculated figures. These results have been compared against the population numbers specified in the Counterproposal. To maintain consistency and totality, the Counterproposal figures also include the stations referenced in the Petition, which need not be relocated or modified. As seen in the results, the Counterproposal will serve in excess of 50,000 people over the Petition **with no loss area created**. It should also be noted the Counterproposal even exceeds the Petition when the above noted corrections are not made.

#### **Counterproposal Population Summary:**

**MUNN-REESE, INC.**  
Broadcast Engineering Consultants  
Coldwater, MI 49036

Allotment	Present	Counterproposal	Net Change
282C3 (Morrisonville, NY)	0	183,465	<b>+183,465</b>
282C3(Hartford, VT)	107,897	107,897	unchanged
231A (Keeseville, NY)	194,914	194,914	unchanged
237A (White River Junction, VT)	66,252	66,252	unchanged
Totals	369,063	552,528	<b>+183,465</b>

**Petition for Rule Making Population Summary:**

Allotment	Present	Proposed		Net Change	
		RM-11227 Original	RM-11227 Recalculated	RM-11227 Original	RM-11227 Recalculated
282C3	107,897	203,956	200,202	+96,059	<b>+92,305</b>
231A	194,914	170,365	150,097	-24,549	<b>-44,817</b>
237A	66,252	74,702	73,637	+8,450	<b>+7,385</b>
282A	0	75,931	72,761	+75,931	<b>+72,761</b>
Totals	369,063	524,954	496,697	+155,891	<b>+127,634</b>

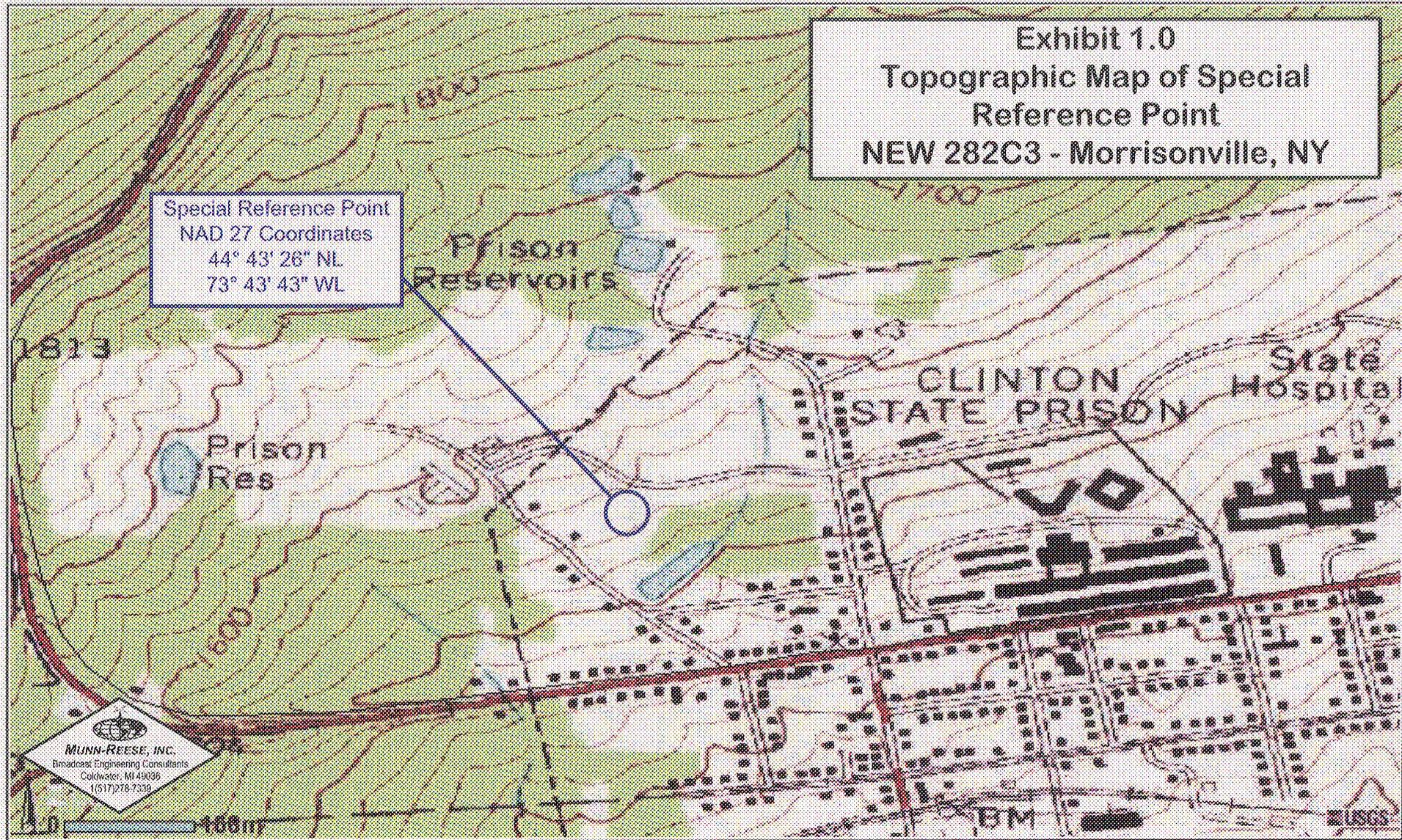
No modification of any existing allocation is required to achieve the goal of this Counterproposal. As stated before, the Counterproposal, which this report supports, will result in two publicly available allotments for two superior communities over the two publicly available allotment communities in the Petition. In addition, greater net gains would be achieved in overall populations with no loss areas created.

Therefore, it is requested the Table of Allotments found in 47 CFR §73.202(b) be amended as follows:

<u>Community</u>	<u>Present Allocation</u>	<u>Proposed Allocation</u>
Harford, VT	282C3	282C3
Keeseville, NY	231A	231A
Morrisonville, NY	---	282C3
White River Junction, VT	237A	237A

Exhibit 1.0  
Topographic Map of Special  
Reference Point  
NEW 282C3 - Morrisonville, NY

Special Reference Point  
NAD 27 Coordinates  
44° 43' 26" NL  
73° 43' 43" WL



MUNN-REESE, INC.  
Broadcast Engineering Consultants  
Corkinville, MI 49039  
(517) 278-7339



44.73212  
-73.73805    Map Extent    -73.715485  
44.718693

The National Map  
<http://nationalmap.gov/>

Geographic Coordinate System (WG584)

**Exhibit 1.1**  
**Photograph of Special Reference Point**  
**NEW 282C3 - Morrisonville, NY**

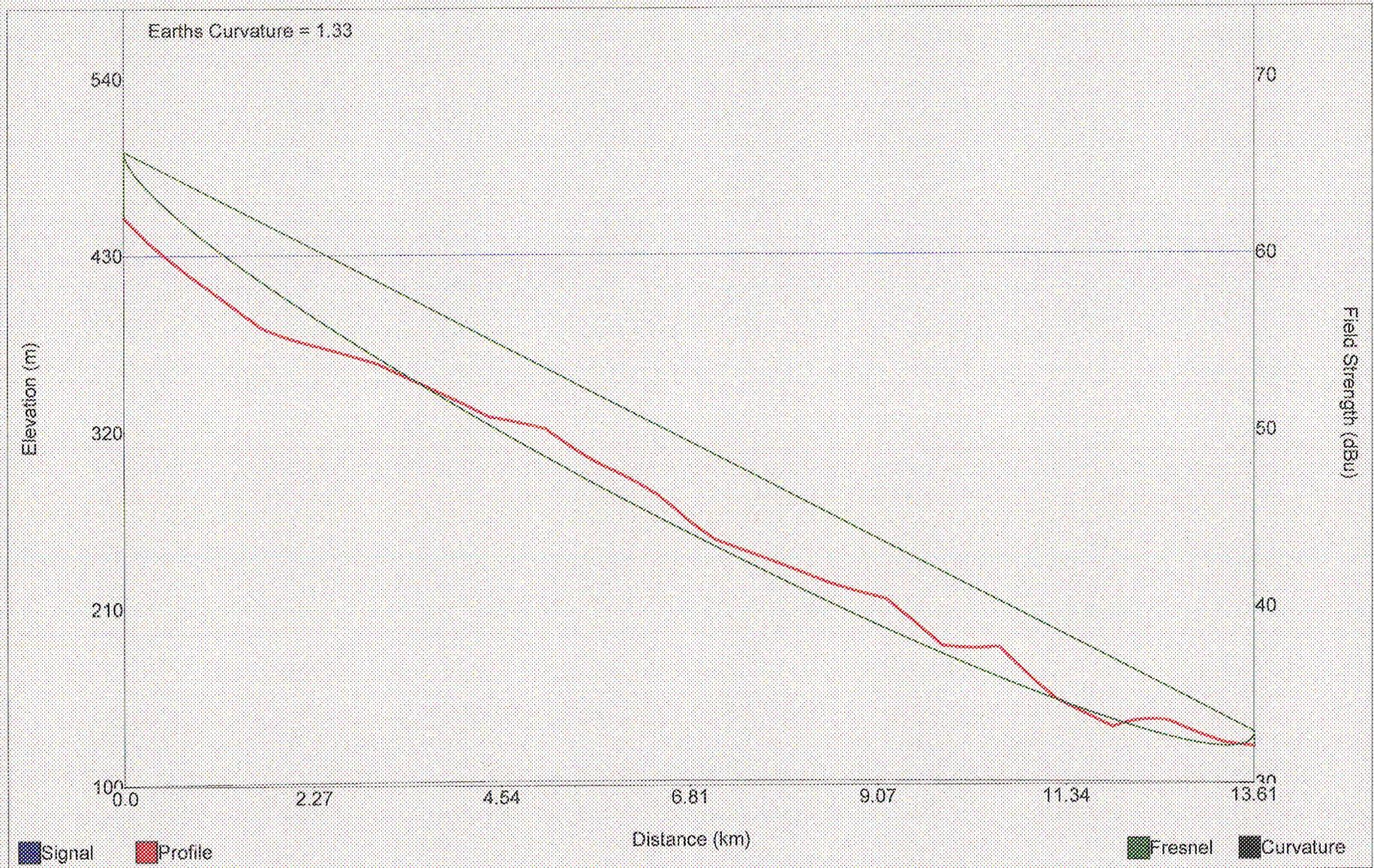
Special Reference Point  
NAD 27 Coordinates  
44° 43' 26" NL  
73° 43' 43" WL



44.73212  
-73.73805    **Map Extent**    -73.715485  
44.718693

**The National Map**  
<http://nationalmap.gov/>

Geographic Coordinate System (WGS84)



Starting Latitude: 44-43-26 N  
 Starting Longitude: 073-43-43 W

End Latitude: 44-41-34 N  
 End Longitude: 073-33-45 W

Distance: 13.810405313 km  
 Bearing: 104.657 deg

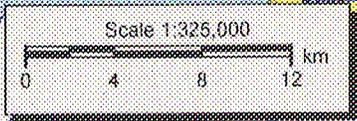
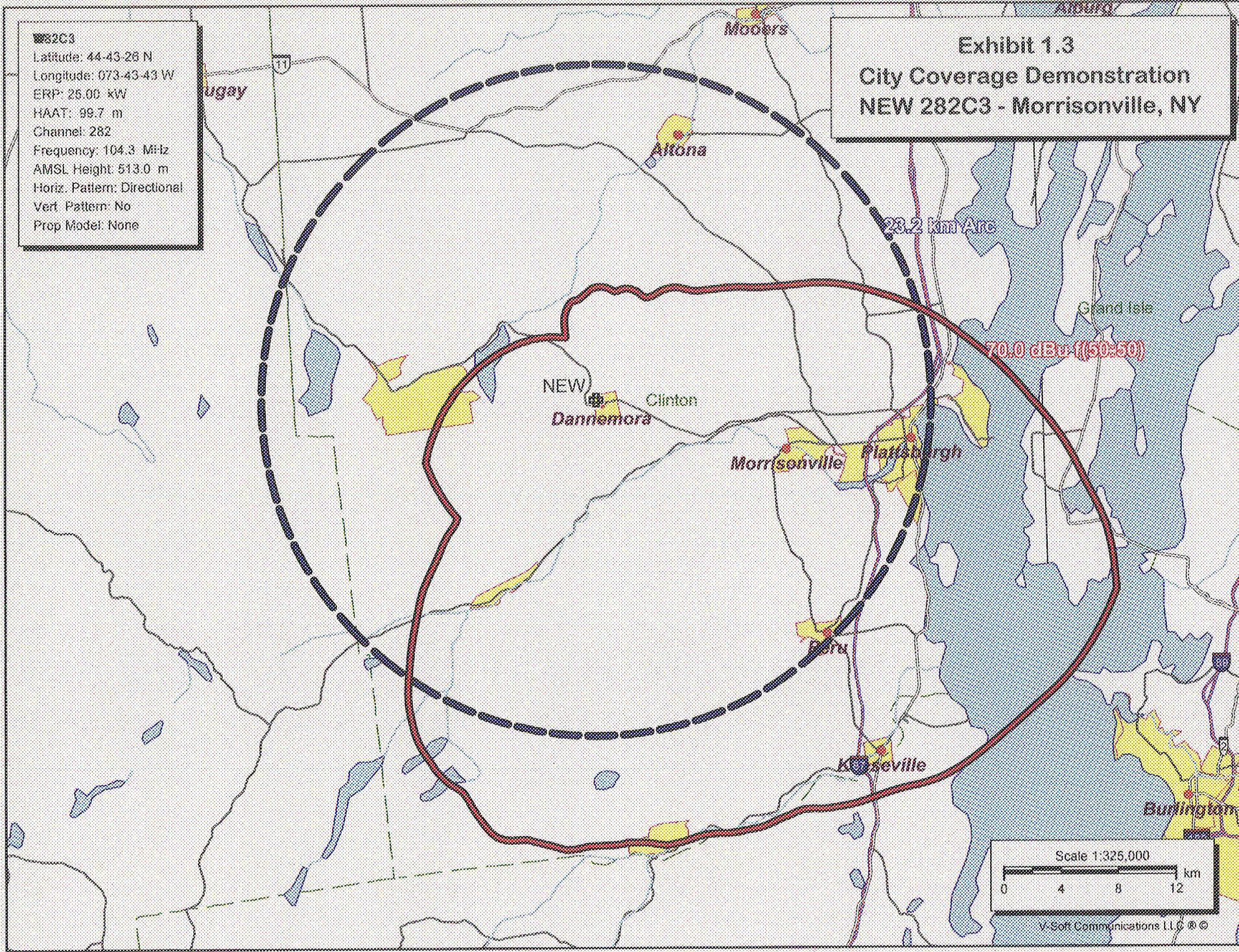
Transmitter Height (AG) = 40.6 m  
 Receiver Height (AG) = 9.1 m

Transmitter Elevation = 472.4 m  
 Receiver Elevation = 122.8 m

Frequency = 104.3 MHz  
 Fresnel Zone: 0.6

NEW 282C3  
Latitude: 44-43-26 N  
Longitude: 073-43-43 W  
ERP: 25.00 kW  
HAAT: 99.7 m  
Channel: 282  
Frequency: 104.3 MHz  
AMSL Height: 513.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

### Exhibit 1.3 City Coverage Demonstration NEW 282C3 - Morrisonville, NY



# Exhibit 2.0

## Tabulation of Proposed Allocation

REFERENCE 44 43 26 N. CLASS - C3 DISPLAY DATES  
 73 43 43 W. Current Spacings DATA 04-30-05  
 Channel 282 - 104.3 MHz SEARCH 05-06-05

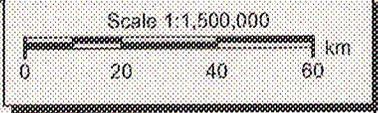
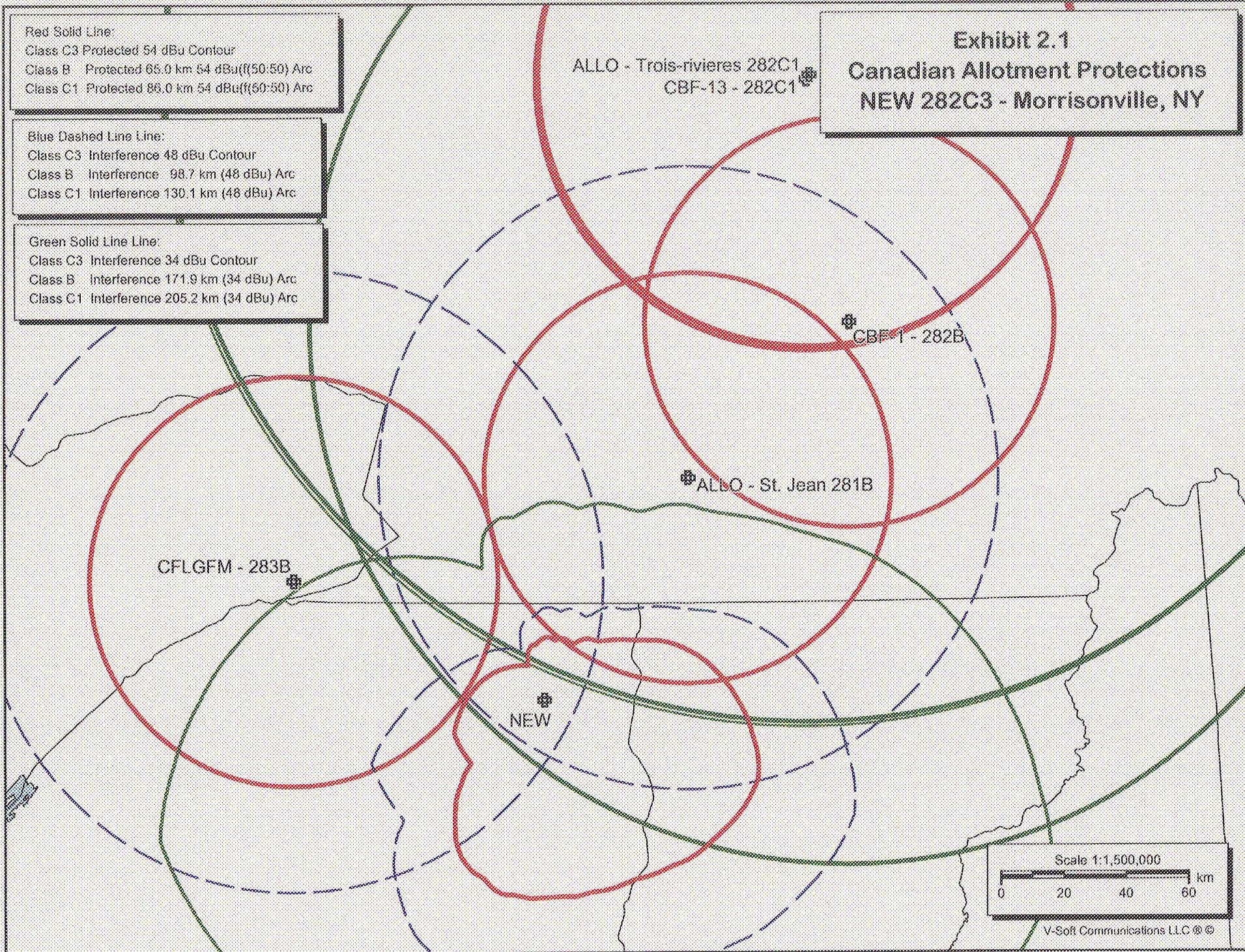
Call	Channel	Location	Azi	Dist	FCC	Margin	
Lat.	Lng.	Ant	Power	HAAT			
RADD	ADD 282C3	Keeseville	NY	143.0	27.65	153.0	-125.35
44 31 31	73 31 07		25.000 kW	100 M			
Nassau Broadcasting III, L							
CBF-1	OPE 282B	Drummondville	QC	38.8	154.05	223.0	-68.95
45 47 47	72 29 04	HN	50.000 kW	40 M			
ALLO	281B	St. Jean	QU	32.7	83.82	149.0	-65.18
45 21 23	73 06 55		50.000 kW	150 M			
RM							
CPLGFM	OPE 283B	Cornwall	CN	295.3	88.51	149.0	-60.49
45 03 30	74 44 45	CN	9.500 kW	92 M			
CBF-13	OPE-D 282C1	Trois-rivieres	QC	22.7	213.60	256.0	-42.40
46 29 27	72 39 00	DCN	100.000 kW	305 M			
ALLO	282C1	Trois-rivieres	QU	22.8	215.20	256.0	-40.80
46 30 10	72 38 15		100.000 kW	299 M			
285	SOP 285D	Saint-remi	QU	356.8	59.19	53.0	6.19
45 15 21	73 46 17	VN	0.001 kW	0 M			
R---	285A1	St-remi	QC	7.8	59.88	53.0	6.88
45 15 28	73 37 28		0.200 kW	356 M			
CKTF	OPE 281C1	Hull	QC	298.2	188.05	181.0	7.05
45 30 11	75 51 02	CN	19.000 kW	323 M			
ALLO	281C1	Hull	QC	298.2	188.05	181.0	7.05
45 30 11	75 51 02		100.000 kW	299 M			
ALLO	285A1	St. Remi	QU	8.5	60.63	53.0	7.63
45 15 49	73 36 52		0.001 kW	0 M			
RDEL	DEL 282C3	Hartford	VT	137.0	161.62	153.0	8.62
43 39 15	72 21 32		25.000 kW	100 M			
Nassau Broadcasting III, L							
WWOD	LIC-N 282C3	Hartford	VT	137.0	161.62	153.0	8.62
43 39 15	72 21 32	NCN	5.600 kW	151 M			
Nassau Broadcasting III, L							
AP280	APP 280D	Winooski	VT	125.6	51.95	41.0	10.95
44 27 03	73 11 51	C	0.019 kW	0 M			
Educational Media Foundati							
BNPFT20030317BOE							

# Exhibit 2.1 Canadian Allotment Protections NEW 282C3 - Morrisonville, NY

Red Solid Line:  
Class C3 Protected 54 dBu Contour  
Class B Protected 65.0 km 54 dBu(f(50:50) Arc  
Class C1 Protected 86.0 km 54 dBu(f(50:50) Arc

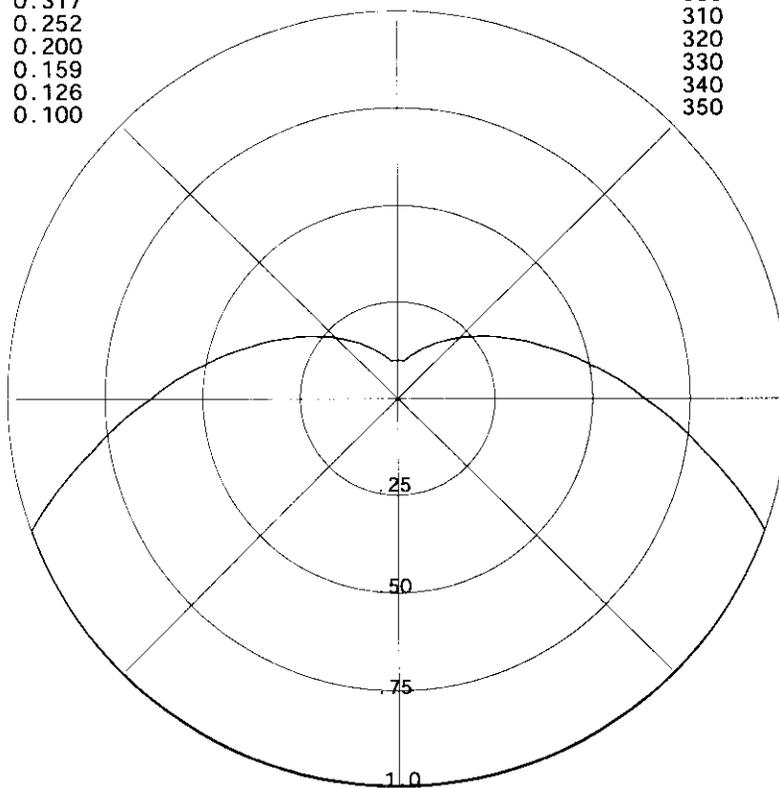
Blue Dashed Line Line:  
Class C3 Interference 48 dBu Contour  
Class B Interference 98.7 km (48 dBu) Arc  
Class C1 Interference 130.1 km (48 dBu) Arc

Green Solid Line Line:  
Class C3 Interference 34 dBu Contour  
Class B Interference 171.9 km (34 dBu) Arc  
Class C1 Interference 205.2 km (34 dBu) Arc



Bearing	Field Value
000	= 0.100
010	= 0.100
020	= 0.126
030	= 0.159
040	= 0.200
050	= 0.252
060	= 0.317
070	= 0.399
080	= 0.502
090	= 0.632
100	= 0.796
110	= 1.000
120	= 1.000
130	= 1.000
140	= 1.000
150	= 1.000
160	= 1.000
170	= 1.000
180	= 1.000
190	= 1.000
200	= 1.000
210	= 1.000
220	= 1.000
230	= 1.000
240	= 1.000
250	= 1.000
260	= 0.796
270	= 0.632
280	= 0.502
290	= 0.399
300	= 0.317
310	= 0.252
320	= 0.200
330	= 0.159
340	= 0.126
350	= 0.100

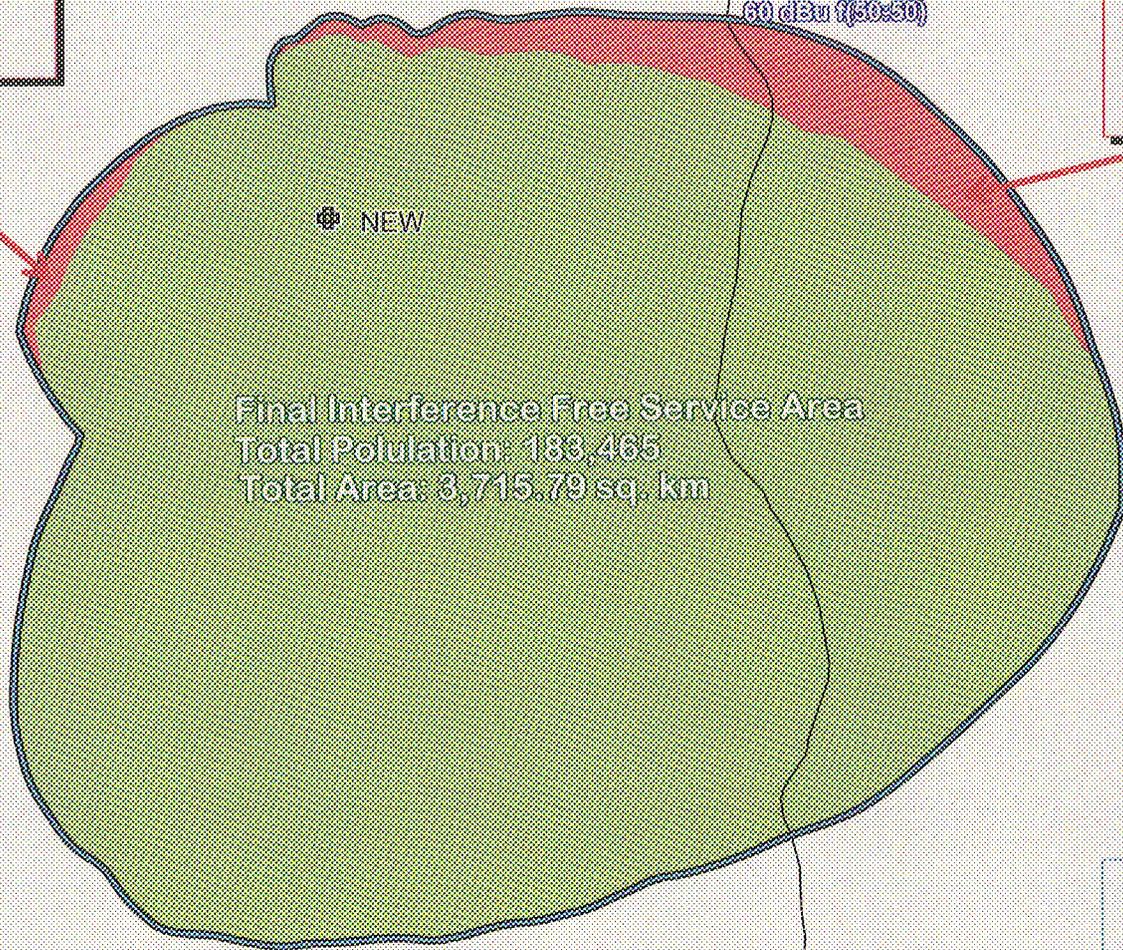
Bearing	Field in dBk
000	= -6.000
010	= -6.000
020	= -4.000
030	= -2.000
040	= 0.000
050	= 2.000
060	= 4.000
070	= 6.000
080	= 8.000
090	= 10.000
100	= 12.000
110	= 13.979
120	= 13.979
130	= 13.979
140	= 13.979
150	= 13.979
160	= 13.979
170	= 13.979
180	= 13.979
190	= 13.979
200	= 13.979
210	= 13.979
220	= 13.979
230	= 13.979
240	= 13.979
250	= 13.979
260	= 12.000
270	= 10.000
280	= 8.000
290	= 6.000
300	= 4.000
310	= 2.000
320	= 0.000
330	= -2.000
340	= -4.000
350	= -6.000



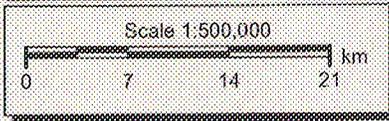
**Exhibit 3.0**  
**Proposed 60 dBu Coverage**  
**NEW 282C3 - Morrisonville, NY**

**CFLGFM Interference Area**  
Population: 34  
Area: 27.19 sq. km

**Combined CBF-1&  
ALLO St. Jean Interference Area**  
Population: 3,398  
Area: 213.98 sq. km



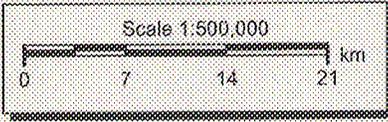
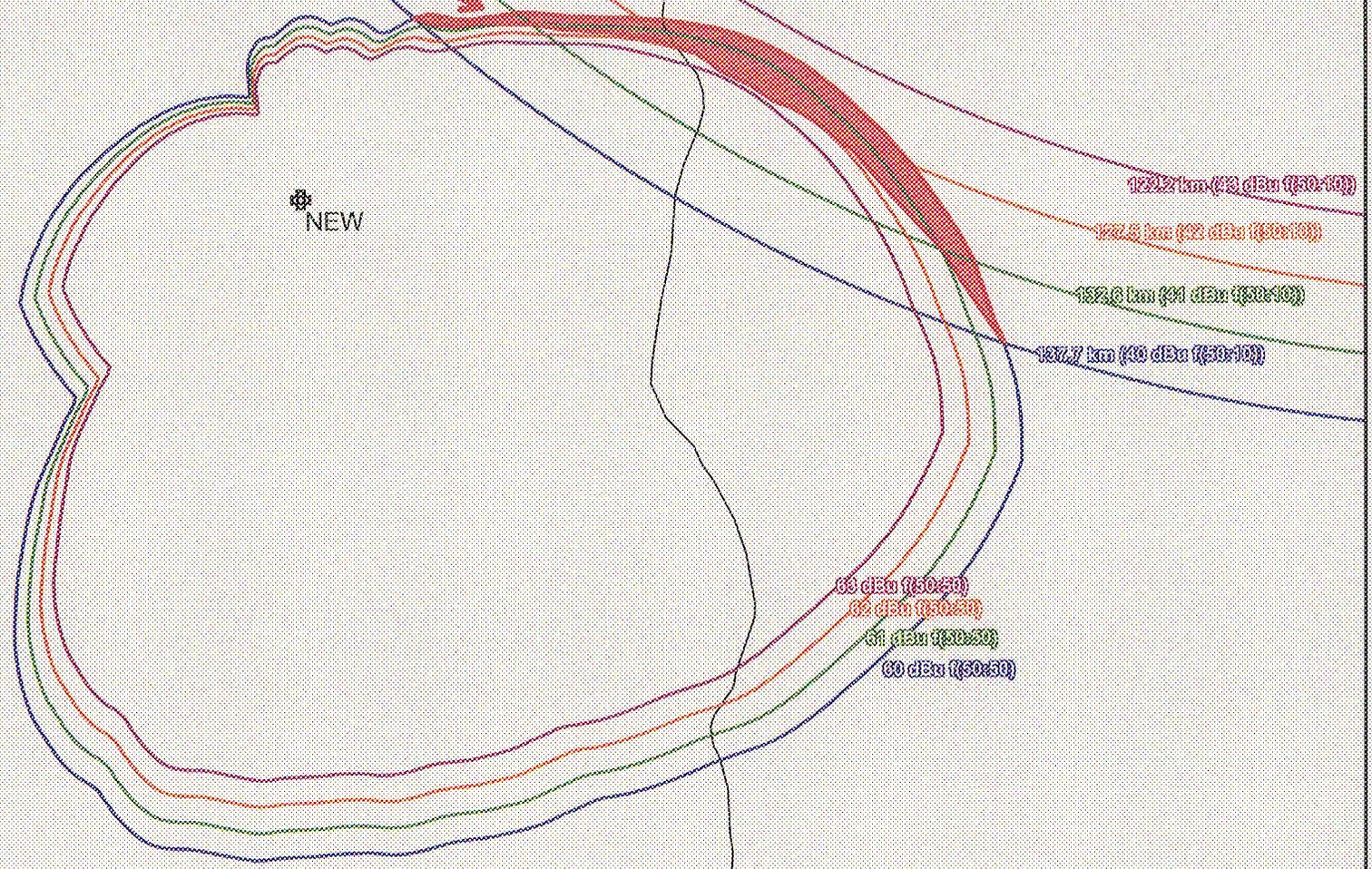
**Unadjusted 60 dBu Area**  
Population Within Contour: 188,883  
Area Within Contour: 3,929.77 sq. km



NEW 282C3  
Latitude: 44-43-26 N  
Longitude: 073-43-43 W  
ERP: 25.00 kW  
HAAT: 99.70 m  
Channel: 282  
Frequency: 104.3 MHz  
AMSL Height: 513.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

Interference From CBF-1  
Total Population: 2,182  
Total Area: 98.71 sq. km

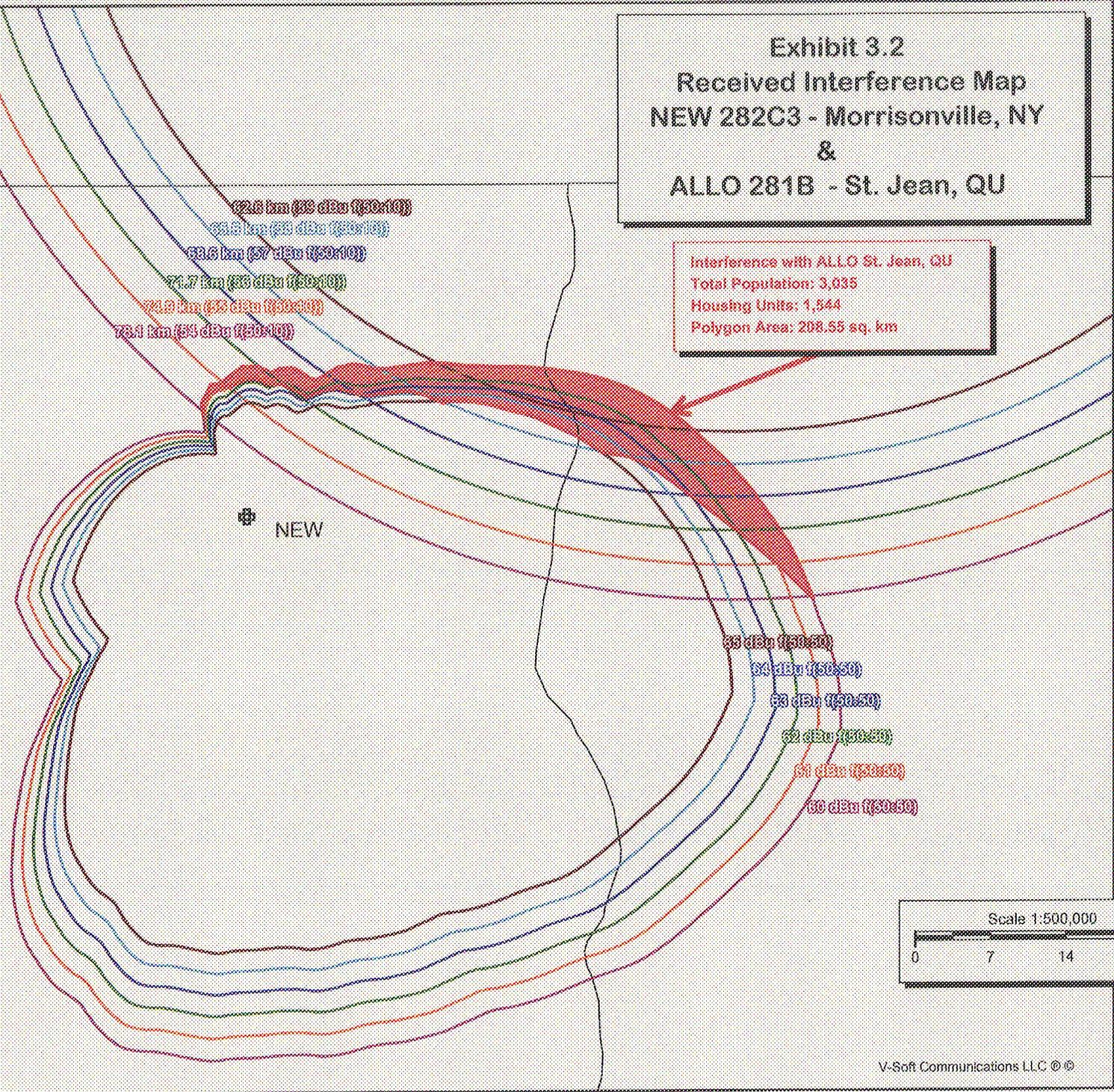
### Exhibit 3.1 Received Interference Map NEW 282C3 - Morrisonville, NY & CBF-1 282B - Drummondville, ON



**NEW 282C3**  
Latitude: 44-43-26 N  
Longitude: 073-43-43 W  
ERP: 25.00 kW  
HAAT: 99.70 m  
Channel: 282  
Frequency: 104.3 MHz  
AMSL Height: 513.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

### Exhibit 3.2 Received Interference Map NEW 282C3 - Morrisonville, NY & ALLO 281B - St. Jean, QU

Interference with ALLO St. Jean, QU  
Total Population: 3,035  
Housing Units: 1,544  
Polygon Area: 208.55 sq. km

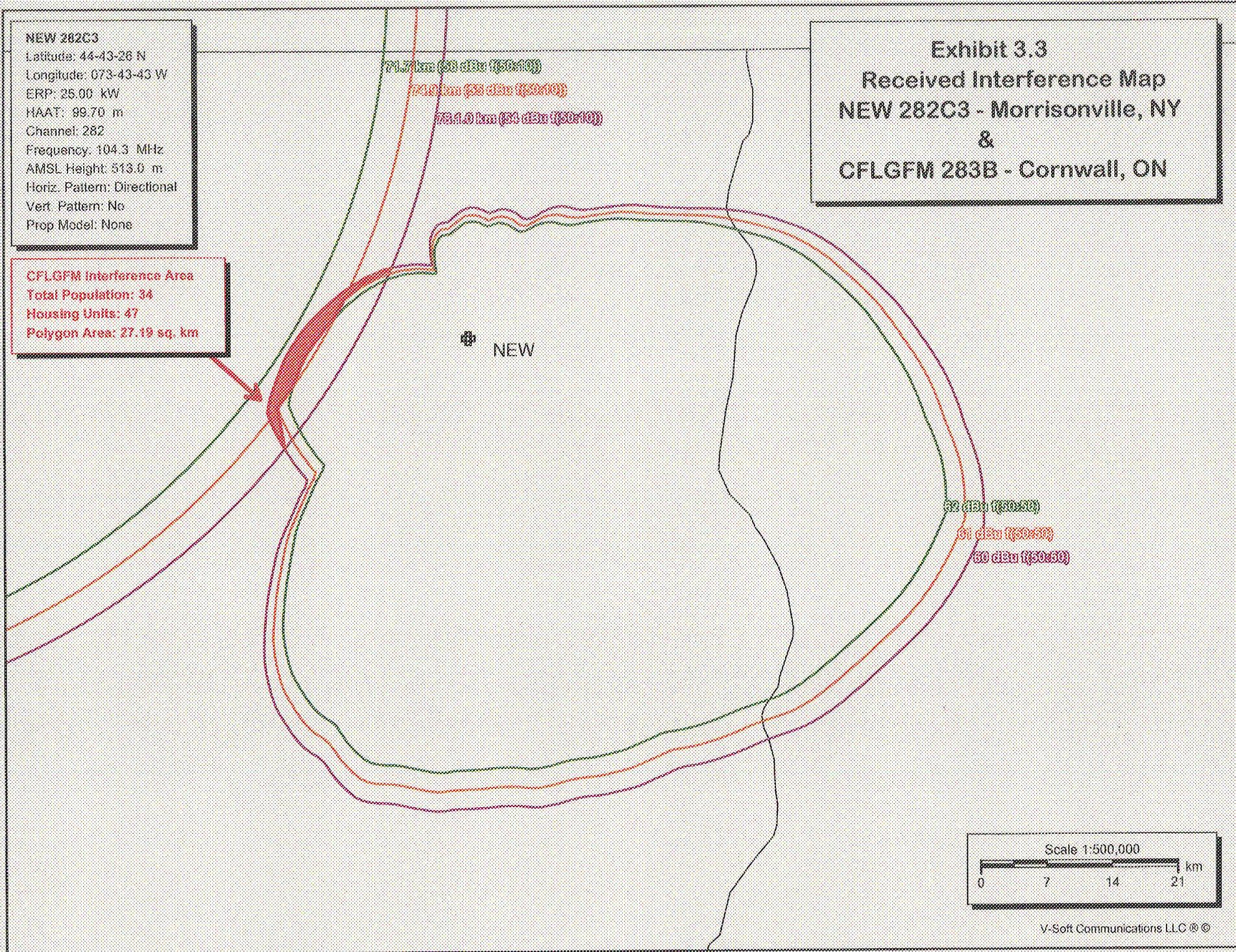


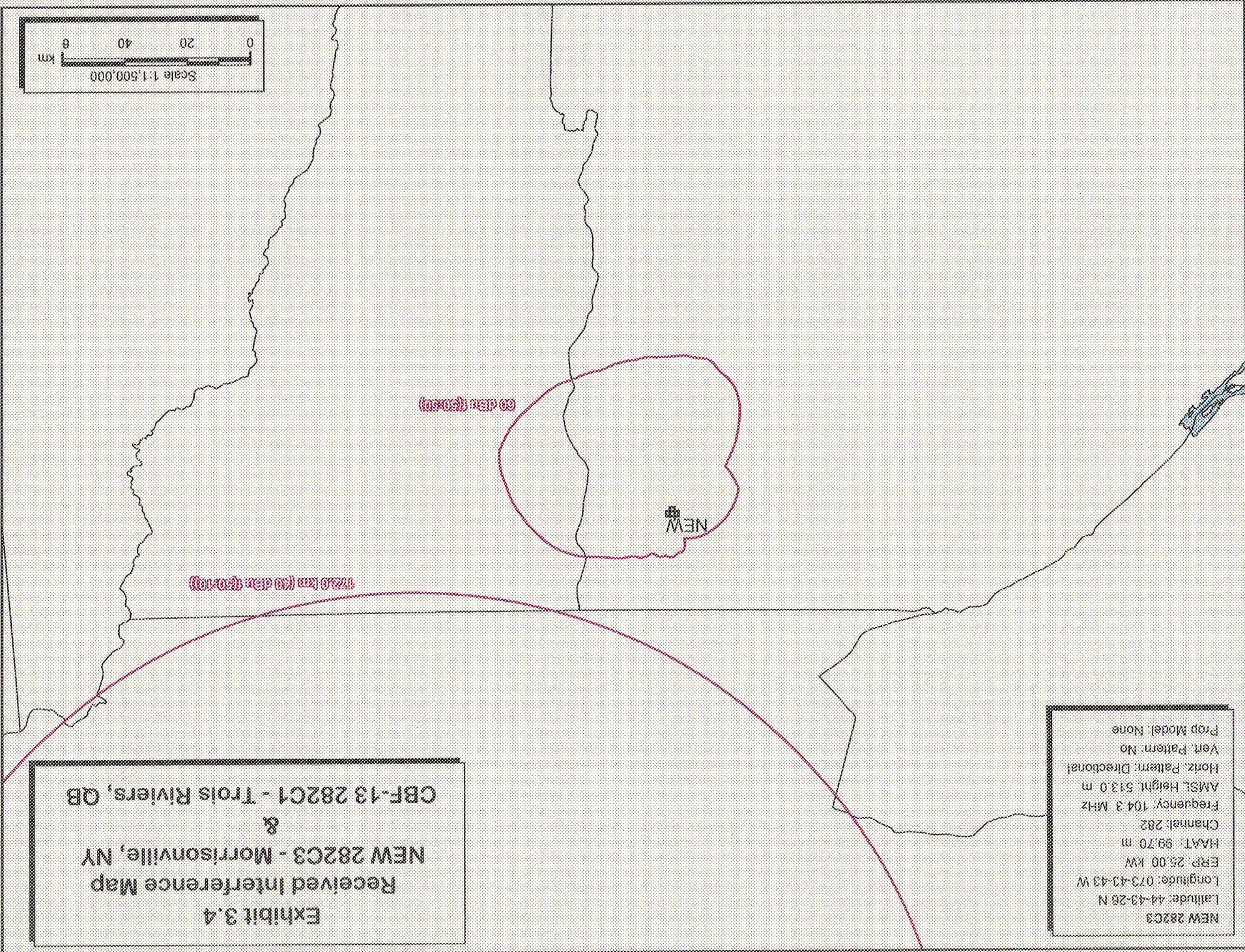
**NEW 282C3**

Latitude: 44-43-26 N  
Longitude: 073-43-43 W  
ERP: 25.00 kW  
HAAT: 99.70 m  
Channel: 282  
Frequency: 104.3 MHz  
AMSL Height: 513.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

**CFLGFM Interference Area**  
Total Population: 34  
Housing Units: 47  
Polygon Area: 27.19 sq. km

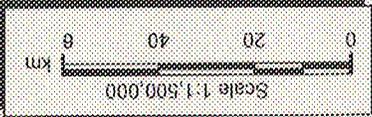
**Exhibit 3.3**  
**Received Interference Map**  
**NEW 282C3 - Morrisonville, NY**  
**&**  
**CFLGFM 283B - Cornwall, ON**





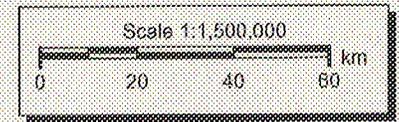
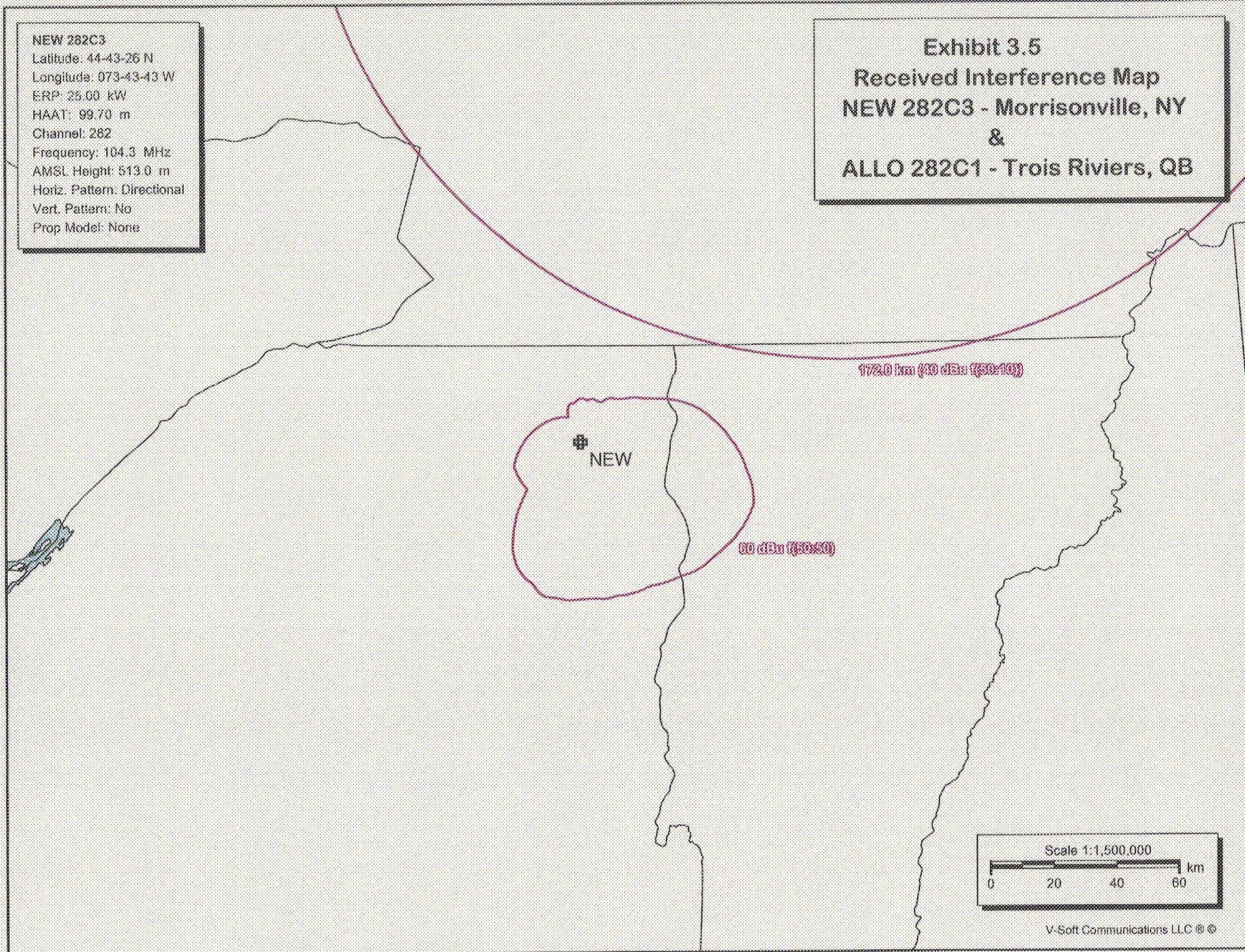
**Exhibit 3.4**  
**Received Interference Map**  
**NEW 282C3 - Morrisonville, NY**  
**&**  
**CBF-13 282C1 - Trois Rivières, QB**

**NEW 282C3**  
 Latitude: 44-43-28 N  
 Longitude: 073-43-43 W  
 ERP: 25.00 kW  
 HAAT: 99.70 m  
 Channel: 282  
 Frequency: 104.3 MHz  
 AMSL Height: 513.0 m  
 Hertz Pattern: Directional  
 Vert. Pattern: No  
 Prop Model: None



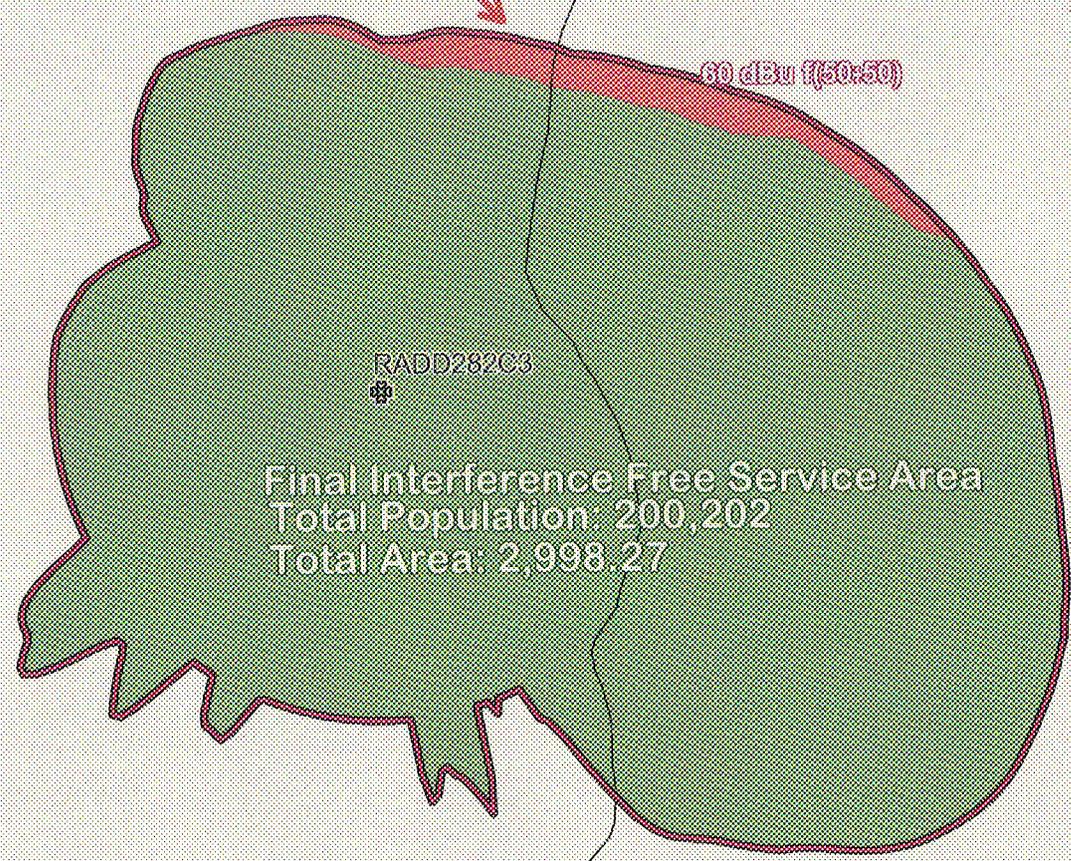
NEW 282C3  
Latitude: 44-43-26 N  
Longitude: 073-43-43 W  
ERP: 25.00 kW  
HAAT: 99.70 m  
Channel: 282  
Frequency: 104.3 MHz  
AMSL Height: 513.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

**Exhibit 3.5**  
**Received Interference Map**  
**NEW 282C3 - Morrisonville, NY**  
**&**  
**ALLO 282C1 - Trois Riviers, QB**



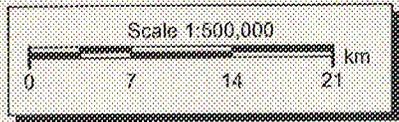
Appendix I - Exhibit 1a  
Proposed 60 dBu Coverage  
RADD 282C3 - Keeseville, NY

Combined CBF-1 &  
ALLO St. Jean Interference Area  
Population: 3,754  
Area: 100.37 sq. km



RADD282C3  
Final Interference Free Service Area  
Total Population: 200,202  
Total Area: 2,998.27

Unadjusted 60 dBu Area  
Population Within Contour: 203,958  
Area Within Contour: 3098.64 sq. km

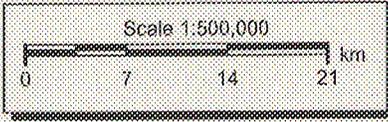
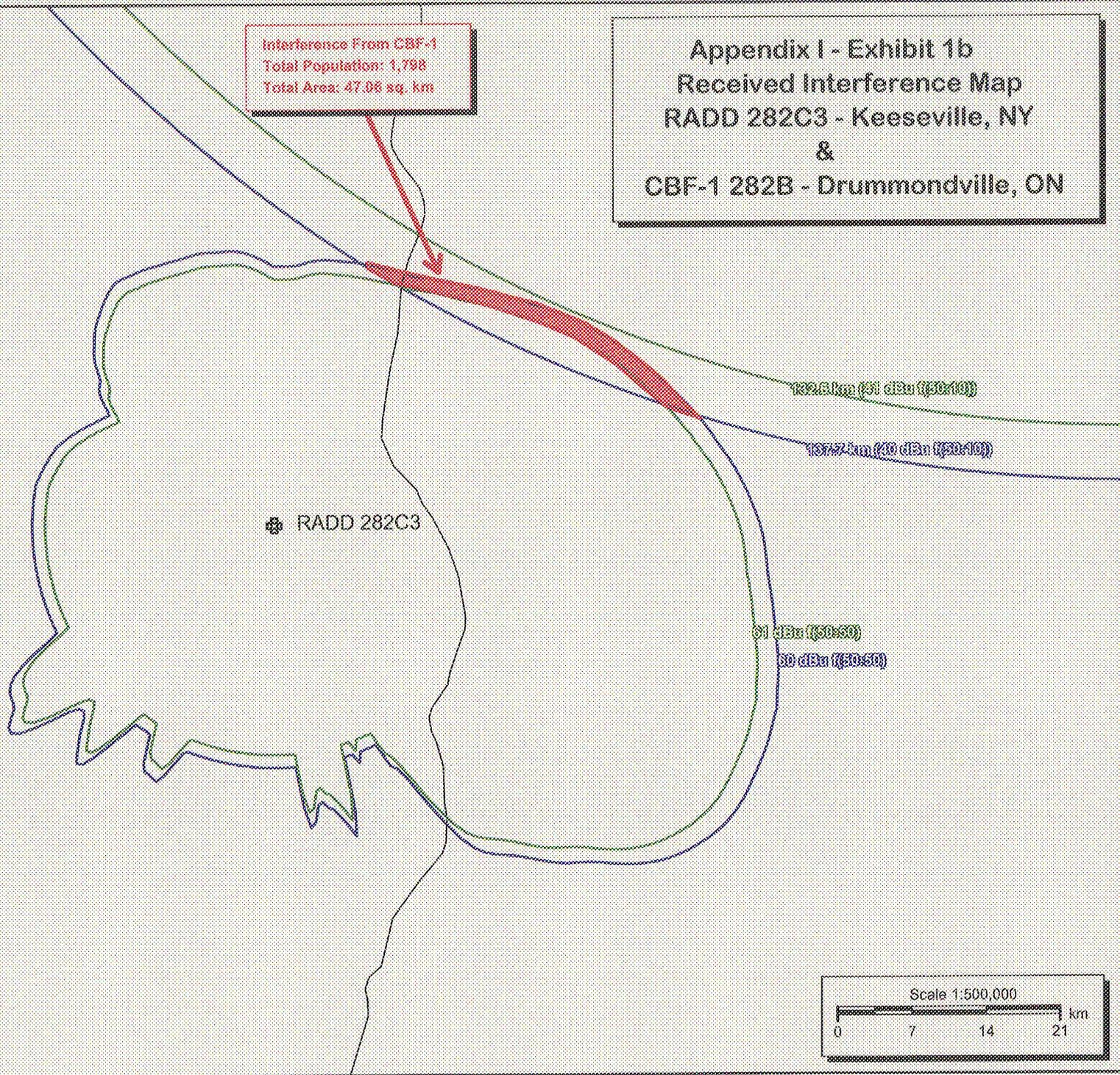


**RADD 282C3**

Latitude: 44-31-31 N  
Longitude: 073-31-07 W  
ERP: 25.00 kW  
HAAT: 100.0 m  
Channel: 282  
Frequency: 194.3 MHz  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

**Interference From CBF-1**  
Total Population: 1,798  
Total Area: 47.06 sq. km

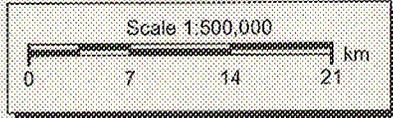
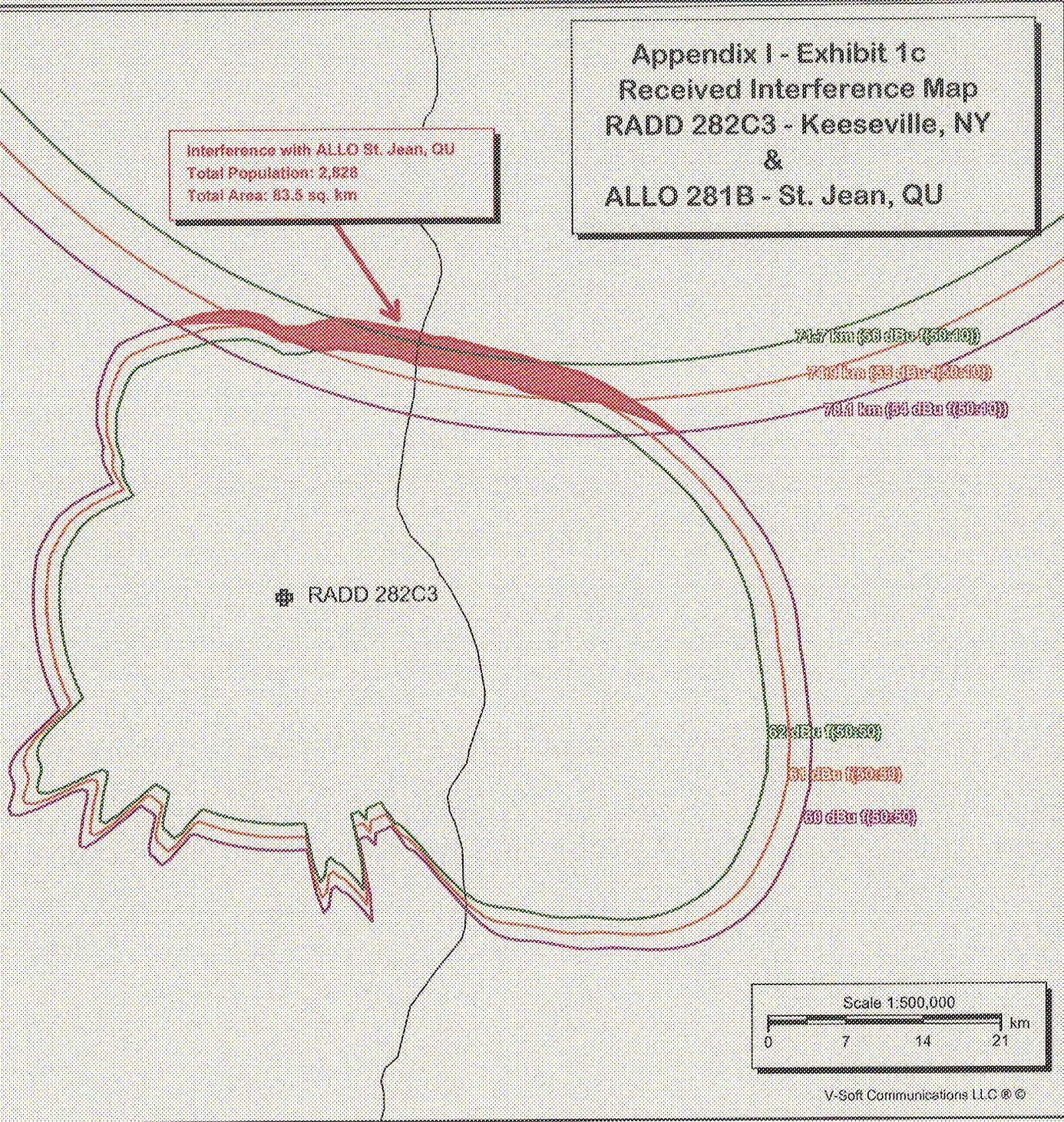
**Appendix I - Exhibit 1b**  
**Received Interference Map**  
**RADD 282C3 - Keeseville, NY**  
**&**  
**CBF-1 282B - Drummondville, ON**



RADD 282C3  
Latitude: 44-31-31 N  
Longitude: 073-31-07 W  
ERP: 25.00 kW  
HAAT: 100.0 m  
Channel: 282  
Frequency: 104.3 MHz  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

Appendix I - Exhibit 1c  
Received Interference Map  
RADD 282C3 - Keeseville, NY  
&  
ALLO 281B - St. Jean, QU

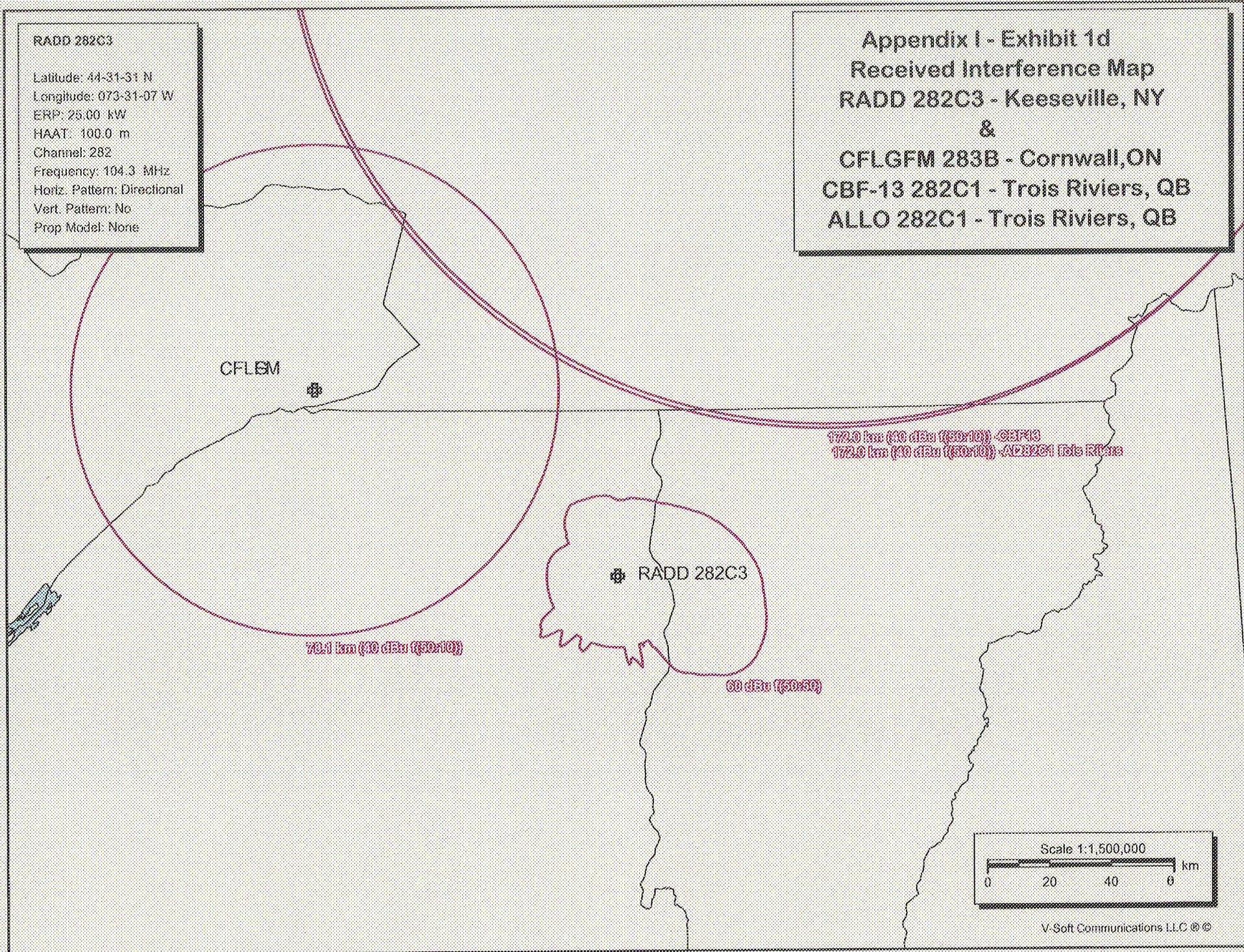
interference with ALLO St. Jean, QU  
Total Population: 2,828  
Total Area: 83.5 sq. km



**RADD 282C3**

Latitude: 44-31-31 N  
Longitude: 073-31-07 W  
ERP: 25.00 kW  
HAAT: 100.0 m  
Channel: 282  
Frequency: 104.3 MHz  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

**Appendix I - Exhibit 1d**  
**Received Interference Map**  
**RADD 282C3 - Keeseville, NY**  
**&**  
**CFLGFM 283B - Cornwall, ON**  
**CBF-13 282C1 - Trois Riviers, QB**  
**ALLO 282C1 - Trois Riviers, QB**

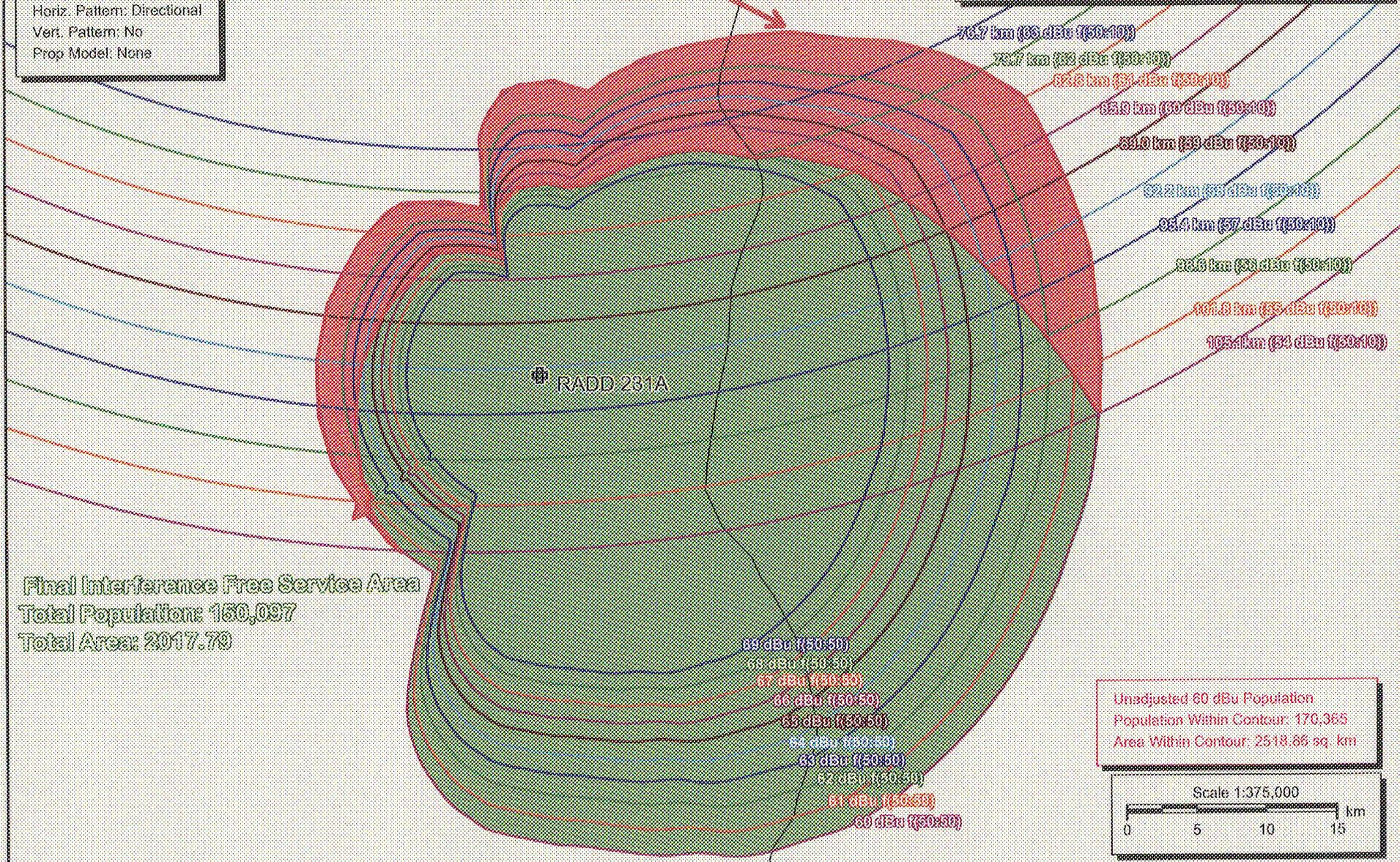


**RADD 231A**

Latitude: 44-40-19 N  
Longitude: 073-32-17 W  
ERP: 6.00 kW  
HAAT: 100.0 m  
Channel: 231  
Frequency: 94.1 MHz  
Horiz. Pattern: Directional  
Vert. Pattern: No  
Prop Model: None

Interference From CKMF  
Population: 20,269  
Area: 601.07 sq. km

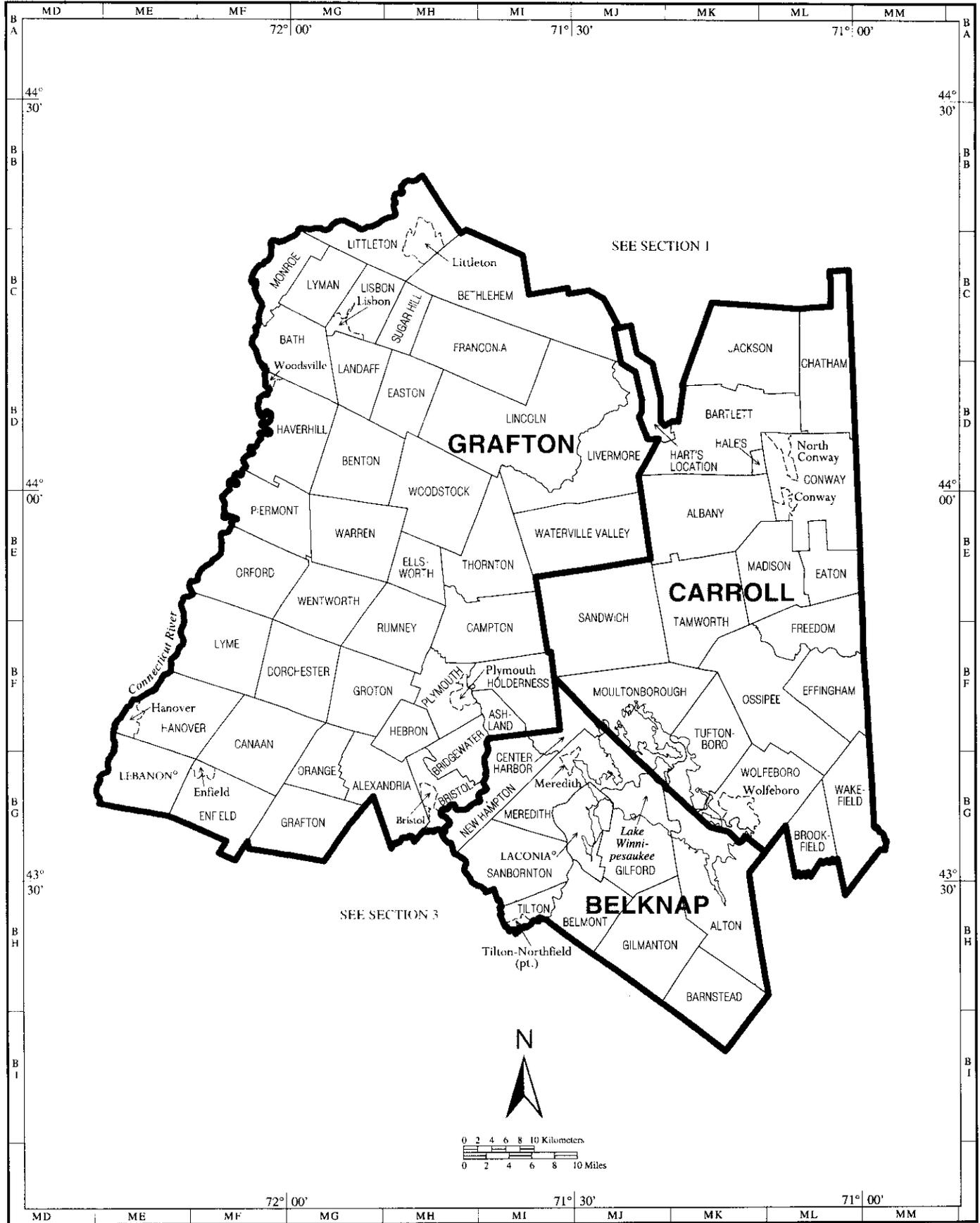
**Appendix I - Exhibit 2a  
Received Interference Map  
RADD 231A - Morrisonville, NY  
&  
CKMF (Class C1) - Montreal, QU**



76.7 km (59 dBu (50-10))  
76.7 km (59 dBu (50-10))  
64.8 km (57 dBu (50-10))  
64.0 km (56 dBu (50-10))  
51.0 km (53 dBu (50-10))  
52.2 km (55 dBu (50-10))  
51.4 km (57 dBu (50-10))  
51.5 km (58 dBu (50-10))  
601.0 km (55 dBu (50-10))  
603.1 km (54 dBu (50-10))

69 dBu (50-50)  
68 dBu (50-50)  
67 dBu (50-50)  
66 dBu (50-50)  
65 dBu (50-50)  
64 dBu (50-50)  
63 dBu (50-50)  
62 dBu (50-50)  
61 dBu (50-50)  
60 dBu (50-50)

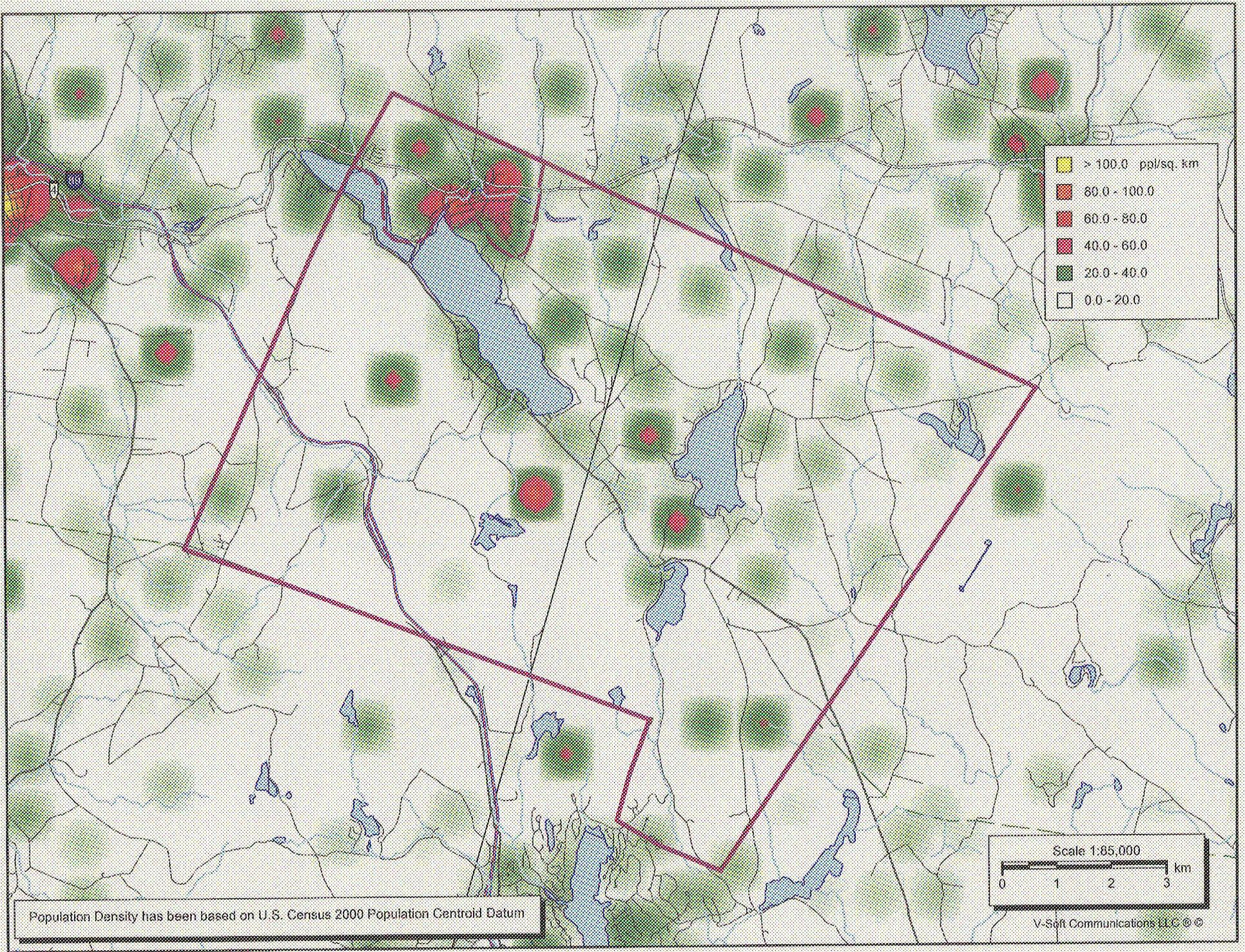
**Counties, County Subdivisions, and Places - Section 2**



**Table 5. Population and Housing Units: 1980 to 2000; and Area Measurements and Density: 2000—Con.**

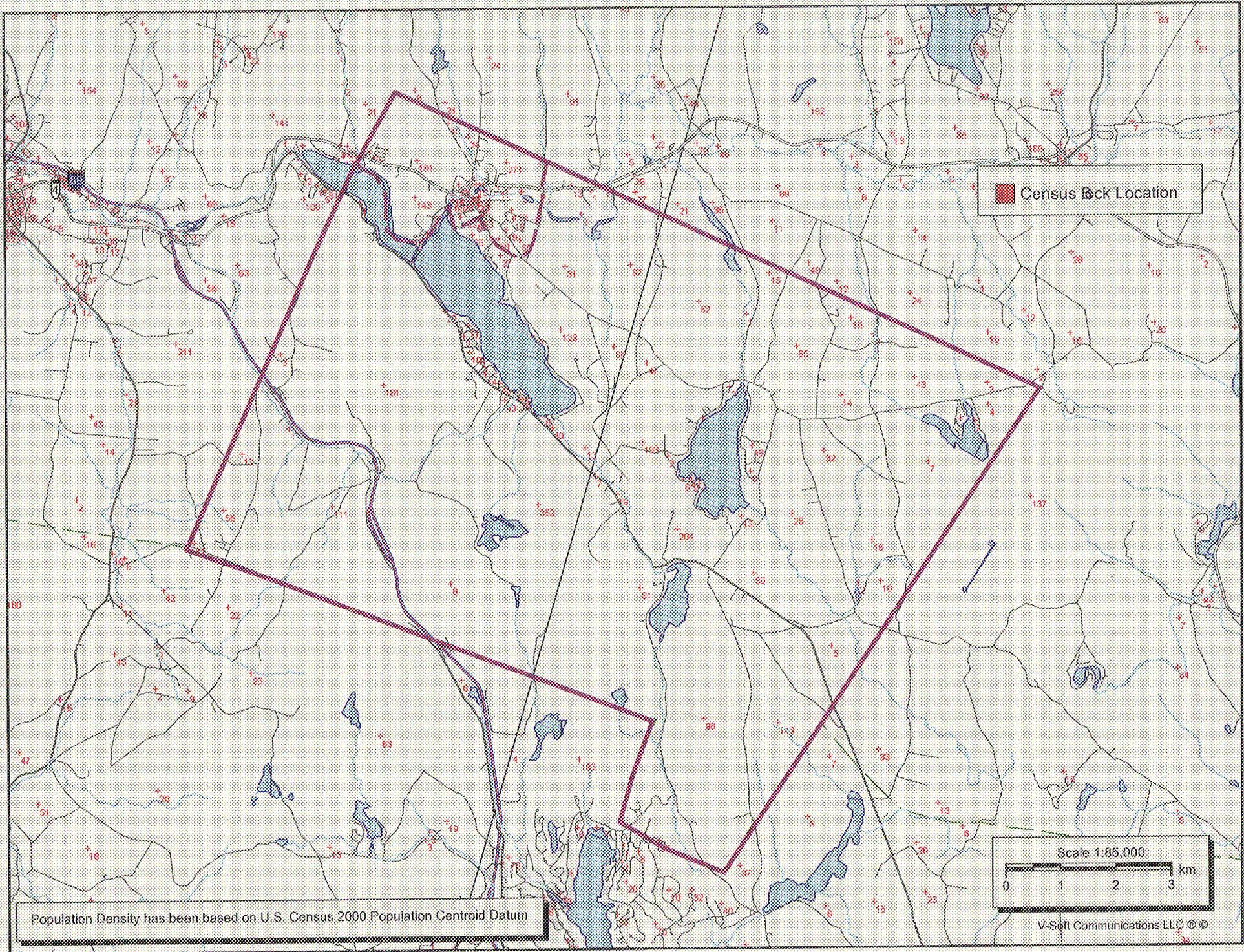
[For information concerning historical counts, see "User Notes." Density computed using land area. For information on nonsampling error and definitions, see text]

State County County Subdivision Place	Population			Housing units			2000 area measurements in square miles		2000 average per square mile	
	2000	1990	1980	2000	1990	1980	Total area	Land area	Population	Housing units
<b>The State—Con.</b>										
Coos County—Con.										
Odeil township	5	—	—	73	78	78	45.17	44.49	0.1	1.6
Pinkhams grant	—	11	30	1	3	20	3.77	3.77	—	0.3
Pittsburg town	867	901	780	1 281	1 224	642	291.35	282.30	3.1	4.5
Randolph town	339	371	274	298	275	234	47.15	47.11	7.2	6.3
Sargents purchase	—	—	—	—	—	—	25.86	25.85	—	—
Second College grant	—	—	—	—	—	—	41.68	41.63	—	0.2
Shelburne town	379	437	318	197	179	125	48.80	47.69	7.9	4.1
Stark town	516	518	470	384	368	278	59.60	59.10	8.7	6.5
Stewartstown town	1 012	1 048	943	760	628	441	46.78	46.38	21.8	16.4
Stratford town	942	927	989	540	479	357	80.00	79.85	11.8	6.8
Success township	2	—	—	71	11	—	59.24	58.76	—	1.2
Thompson and Meserves purchase	—	—	—	—	—	—	18.50	18.50	—	—
Wentworth location	44	53	49	109	118	103	19.47	18.76	2.3	5.8
Whitefield town	2 038	1 909	1 681	1 158	1 111	867	34.68	34.25	59.5	33.8
Whitefield CDP	1 089	1 041	1 005	525	488	452	1.29	1.29	845.9	407.8
Grafton County	81 743	74 929	65 806	43 729	42 206	32 246	1 750.08	1 713.33	47.7	25.5
Alexandria town	1 329	1 190	706	783	721	427	43.09	43.00	30.9	18.2
Ashland town	1 955	1 915	1 807	1 149	1 162	908	11.71	11.25	173.7	102.1
Bath town	893	784	761	450	438	373	38.64	38.19	23.4	11.8
Benton town †	314	330	333	155	133	120	48.37	48.15	6.5	3.2
Bethlehem town	2 199	2 033	1 784	1 307	1 221	994	91.00	90.94	24.2	14.4
Bridgewater town	974	796	606	850	839	594	21.45	21.27	45.8	40.0
Bristol town	3 033	2 198	2 198	2 073	2 250	1 747	22.26	21.74	174.9	119.5
Bristol CDP †	1 670	1 483	1 258	928	945	545	4.76	4.74	352.1	195.7
Campton town	2 719	2 377	1 694	1 759	1 627	1 102	52.52	51.93	52.4	33.9
Canaan town	3 319	3 045	2 455	1 588	1 435	1 118	53.22	52.22	62.4	29.6
Dorchester town	363	392	344	236	214	154	45.24	44.69	7.9	5.3
Easton town	256	223	124	187	171	135	31.19	31.18	8.2	6.0
Ellsworth town	87	74	53	72	105	78	21.48	21.39	4.1	3.4
Enfield town	4 618	3 979	3 175	2 372	2 158	1 541	43.10	40.25	114.7	58.9
Enfield CDP	1 698	1 560	1 581	792	734	627	2.35	2.29	742.9	346.5
Franconia town	924	811	743	702	646	562	65.96	65.88	14.0	10.7
Grafton town	1 138	923	739	698	601	519	42.63	41.83	27.2	16.7
Groton town	456	318	255	342	262	233	40.82	40.78	11.2	8.4
Hanover town	10 850	9 212	9 119	2 989	2 623	2 373	50.21	49.09	221.0	60.9
Hanover CDP †	8 162	6 538	6 861	1 891	1 490	1 516	4.96	4.55	1 792.2	415.2
Haverhill town	4 416	4 164	3 445	2 148	2 031	1 649	52.44	51.08	86.5	42.1
Woodsville CDP	1 081	1 122	1 195	517	532	592	0.91	0.89	1 209.4	578.4
Hebron town	459	386	349	517	452	415	18.90	16.83	27.3	30.7
Holderness town †	1 930	1 694	1 586	1 208	1 136	968	35.63	30.38	63.5	39.8
Landaff town	378	350	266	214	196	156	28.45	28.39	13.3	7.5
Lebanon city	12 568	12 183	11 134	5 707	5 718	4 758	41.36	40.36	311.4	141.4
Lincoln town	1 271	1 229	1 313	2 339	2 302	837	130.92	130.70	9.7	17.9
Lisbon town	1 587	1 664	1 517	727	769	729	26.68	26.51	59.9	27.4
Lisbon CDP	1 070	1 246	1 151	469	532	524	3.36	3.35	319.8	140.2
Littleton town	5 845	5 827	5 558	2 746	2 688	2 485	54.09	50.24	116.3	54.7
Littleton CDP	4 431	4 633	4 480	2 093	2 103	1 989	8.61	8.61	514.8	243.2
Livermore town	9	—	—	1	—	—	63.90	63.63	—	—
Lyman town	487	388	281	280	269	172	28.45	28.46	17.1	9.8
Lyme town	1 679	1 496	1 289	752	693	600	54.97	53.85	31.2	14.0
Monroe town	759	746	619	333	304	261	23.80	22.38	33.9	14.9
Orange town	299	237	197	134	119	100	23.25	23.22	12.9	5.8
Orford town	1 091	1 008	928	561	534	501	48.02	46.67	23.4	12.0
Piermont town	709	624	507	394	404	293	39.82	38.49	18.4	10.2
Plymouth town †	5 892	5 811	5 094	1 901	2 075	1 608	28.74	28.39	207.5	67.0
Plymouth CDP	3 528	3 967	3 628	772	1 066	934	3.77	3.71	951.3	208.2
Rumney town	1 480	1 446	1 212	879	943	713	42.56	41.92	35.3	21.0
Sugar Hill town	563	464	397	385	338	294	17.23	17.11	32.9	22.5
Thornton town	1 843	1 505	952	1 487	1 368	844	50.82	50.40	36.6	29.5
Warren town	873	820	650	506	488	450	49.05	48.66	17.9	10.4
Waterville Valley town	257	151	180	1 097	1 168	452	64.92	64.89	4.0	16.9
Wentworth town	798	630	527	437	400	321	41.94	41.66	19.2	10.5
Woodstock town †	1 139	1 167	1 008	1 264	1 204	671	59.22	58.72	19.4	21.5
Hillsborough County	380 841	335 838	276 608	149 961	135 622	101 208	892.20	876.36	434.6	171.1
Amherst town	10 769	9 068	8 243	3 752	3 179	2 594	34.81	34.29	314.1	109.4
Antrim town	2 449	2 360	2 208	1 160	1 162	941	36.60	35.67	68.7	32.5
Antrim CDP †	1 389	1 325	1 142	541	549	454	4.50	4.50	308.9	120.3
Bedford town	18 274	12 563	9 481	6 401	4 156	2 858	33.92	32.83	556.6	195.0
Bennington town	1 401	1 236	890	635	643	353	11.32	11.06	126.7	57.4
Brookline town	4 181	2 410	1 766	1 384	881	609	20.13	19.77	211.5	70.0
Deering town	1 875	1 707	1 041	933	757	461	31.44	30.80	60.9	30.3
Franconia town †	1 480	1 217	830	656	580	342	30.70	30.16	49.1	21.7
Goffstown town	16 929	14 621	11 315	5 798	5 022	3 457	37.51	36.89	458.9	157.2
Pinebluffs CDP †	5 779	4 654	(X)	1 969	1 910	(X)	1.80	1.65	3 499.2	1 192.3
Greenfield town †	1 657	1 519	972	640	517	416	26.01	25.45	65.1	25.1
Greenville town	2 224	2 231	1 988	918	918	715	6.87	6.87	323.8	133.6
Greenville CDP	1 131	1 135	1 447	487	479	496	3.39	3.39	333.7	143.7
Hancock town	1 739	1 604	1 193	814	723	496	31.22	29.97	58.0	27.2
Hillsborough town	4 928	4 498	3 437	2 326	2 157	1 828	44.63	43.63	112.9	53.3
Hillsborough CDP	1 842	1 826	1 797	809	794	791	1.63	1.63	1 130.5	496.5
Hollis town	7 015	5 705	4 679	2 491	2 006	1 553	32.31	31.75	221.0	78.5
Hudson town	22 928	19 530	14 022	8 165	6 902	4 369	29.09	28.27	811.2	288.9
Hudson CDP †	7 814	7 626	6 248	3 125	2 960	2 021	3.23	3.06	2 549.5	1 019.6
Litchfield town	7 360	5 516	4 150	2 389	1 845	1 319	15.45	15.10	487.5	158.3
Lyndeborough town †	1 585	1 294	1 070	587	488	390	31.21	31.09	51.0	18.9
Manchester city	107 006	99 332	90 936	45 892	44 361	35 869	34.91	33.01	3 241.4	1 390.2
Mason town	1 147	1 212	792	455	451	294	23.96	23.90	48.0	19.0
Merrimack town	25 119	22 156	15 406	8 959	7 915	4 584	33.43	32.60	770.6	274.8
East Merrimack CDP	3 784	3 656	2 052	1 709	1 696	660	3.32	3.02	1 253.0	585.9
Milford town †	13 535	11 795	8 685	5 316	4 793	3 255	25.28	25.29	536.5	210.7
Milford CDP	8 293	8 015	6 269	3 463	3 398	2 382	5.74	5.72	1 450.3	605.6
Wilton CDP (part) †	89	116	89	35	42	35	0.51	0.51	176.0	69.2
Mont Vernon town †	2 034	1 812	1 444	720	614	466	16.70	16.62	122.4	43.3
Nashua city	86 605	79 862	67 865	35 387	33 383	25 444	31.84	30.89	2 803.5	1 145.5
New Boston town	4 138	3 214	1 928	1 462	1 138	677	43.22	42.84	96.6	34.1
New Ipswich town	4 289	4 014	2 433	1 449	1 326	808	33.06	32.75	131.0	44.2
Palham town	10 914	9 408	8 090	3 740	3 118	2 408	26.96	26.43	412.9	141.5
Peterborough town	5 883	5 239	4 895	2 509	2 242	1 973	38.11	37.71	156.0	66.5

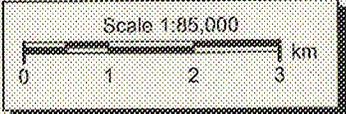


Population Density has been based on U.S. Census 2000 Population Centroid Datum

V-Soft Communications LLC ©



■ Census Dock Location



Population Density has been based on U.S. Census 2000 Population Centroid Datum

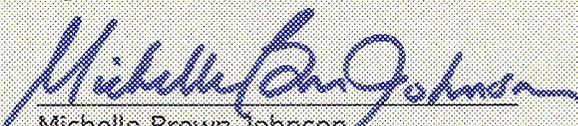
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**CERTIFICATE OF SERVICE**

I, Michelle Brown Johnson, a secretary at the law firm of Fletcher, Heald & Hildreth PLC, do hereby certify that true copies of the foregoing were mailed, postage prepaid on this 31<sup>st</sup> day of May, 2005, to the following:

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