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BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, DC 20554

Federal Communications Commission  
Office of Secretary

In the Matter of )  
)  
)  
Amendment of Section 73.202(b), ) MB Docket No. 04-19  
Table of Allotments, ) RM-10845  
)  
FM Broadcast Stations. )  
(Talladega and Munford, Alabama) )

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**REQUEST FOR LEAVE AND REPLY COMMENTS OF CALHOUN COMMUNICATIONS**

Calhoun Communications ("CC"), by counsel, respectfully requests leave, pursuant to 47 C.F.R. § 1.415(d), to submit this reply (the "Reply") to the "Response to 'Request for Supplemental Information,'" filed by Jacobs Broadcast Group, Inc. (the "Jacobs Response") on June 20, 2005 in the above-referenced matter.

The purpose of this Reply is to ensure a full record in response to the Commission's order, *Talladega and Munford, Alabama: Request for Supplemental Information*, DA 05-1149, MB Docket No. 04-19, RM-10845 (Released April 27, 2005) (the "Supplemental Request").

**I. Introduction**

The Commission issued the *Supplemental Request* after determining "that as a Munford station, Petitioner could relocate the Station WTDR transmitter to a site that would serve most of the Anniston Urbanized Area." *Supplemental Request* at ¶ 3. In so doing, the Commission directly confronted a core issue in this, and many other allocation cases: proposed station relocations, such as the one proposed for WTDR, open the door to "a two-step procedure to implement a migration of a station from a rural to an urbanized area." *Id.* The method reasonably chosen by the Commission to prevent the circumvention of Commission rules and policies by this potential two-step procedure is to require an applicant such as Jacobs to make the independence showing outlined in *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) ("*Tuck*") at

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the first step. This is done because a *Tuck* showing is generally not required after the community of license has been changed if the site proposed meets the Commission's technical rules.

Jacobs, however, persists in its attempts to evade the "two-step" issue by claiming, incorrectly that "a *Tuck* showing is not required." *Jacobs Response* at 1, ¶ 1. Such a claim would be more persuasive if Jacobs itself had ruled out the possibility of a "two-step" with a simple binding pledge that it will not later move even closer to Anniston should WTDR be allowed to relocate to Munford. But, Jacobs has steadfastly avoided such a pledge anywhere on the record of this proceeding.

When the Commission reviews the facts on this record, and filters out sly verbiage and informational sleights of hand, it will see that Jacobs has not demonstrated— nor can it demonstrate – that Munford qualifies as an independent community. Munford is merely a crossroads, interdependent with the adjacent Anniston Urbanized Area.

## II. Discussion

Try as it might, Jacobs has failed to demonstrate Munford's independence from the Anniston Urbanized Area. The *Jacobs Response* attempts to hide this fact, in several places, through nothing more than double-talk. This is evident when Jacobs proclaims one thing in a "headline" and then states the opposite in the text following the headline.

For instance, one Jacobs headline asserts: "Munford has its own . . . phone book,"<sup>1</sup> when it, in fact, does not have its own phone book. Jacobs backs off from its sensational headline later, in the text, when it notes that a county-wide phonebook "contains listings for the

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<sup>1</sup> *Jacobs Response* at 4.

community of Munford.”<sup>2</sup> Jacobs cannot change the reality that Munford lacks its own phone book.

Jacobs offers a similarly extravagant headline when it proclaims “Munford has its own schools, police department . . . .”<sup>3</sup> But, in fact, the municipal government of Munford provides neither of these services. Again, Jacobs acknowledges the truth only in the text following its headline when it states that the “Talladega County School System provides K-12 education to the community of Munford . . . [and] The County of Talladega provides police protection and enforcement services for the Town of Munford.”<sup>4</sup> While it is true that the county school system does have facilities in Munford – as would be appropriate in a bedroom town, the County’s law enforcement operation has no station in Munford. The town of Munford simply does not provide these services – or almost any services at all – despite the inclusion of inapposite headlines in *Jacobs Response*.<sup>5</sup>

In similar fashion, Jacobs takes liberties with U.S. Census (“Census”) statistics. It claims that the Census reports “127 of the 870 employed individuals in Munford, or 14.6%, work in Munford.” *Jacobs Response* at 2. But, in fact, the Census figures cited by Jacobs do not report the population within the municipality of Munford. The Census data cited by Jacobs measures

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<sup>2</sup> *Id.*

<sup>3</sup> *Id.* at 5.

<sup>4</sup> *Id.*

<sup>5</sup> In fact, as of last summer, in Munford “the only [municipal] service offered to date is mosquito spraying . . . during spring and summer months.” Kristen Himman, *Two years after incorporation, Munford deals with change*, Anniston Star, Aug. 8, 2004, available at <http://www.jaxnews.com/news/2002/as-talladega-1013-wyoder-2j12w2051.htm>.

the population of the Munford Census Designated Place (“CDP”)<sup>6</sup> – which represents a geographically larger area than the incorporated municipality of the same name. The incorporated municipality has a much smaller population of just 1,508.<sup>7</sup> This amounts to a 39% difference! Given such a large disparity, the Commission cannot tell where the commuters cited by Jacobs actually live and work; do they live and work in the municipality, or in the greater CDP, or in a combination of places? It is impossible to tell. The figures that Jacobs provides are, therefore, meaningless for the required *Tuck* analysis – as the municipality, not the CDP, is the community in question. The CDP is simply irrelevant.

The Commission must not be distracted by irrelevant data sets that bear only a superficial relationship to the core issue only by virtue of the name “Munford” appearing in the title.<sup>8</sup> Since the CDP and the incorporated municipality of Munford are not the same, the Commission should simply disregard these irrelevant Census commuting statistics.

Even if these figures were relevant (which they are not), Jacobs claims that the employment in the Munford CDP of just 14.6 % of Munford’s working residents “compares favorably with other independent communities” under Commission case law, *Jacobs Response* at 2, when, in fact, the cases cited by Jacobs do not support this assertion.

In *Albemarle and Indian Trail, North Carolina*, 16 FCC Rcd 13876 (2001), the Commission found that the *Tuck* standards had been met not because “11.3% of working age

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<sup>6</sup> Exhibit 1 to *Jacobs Response* includes Census data tables clearly labeled as pertaining to the “Munford CDP,” not to the incorporated municipality that Jacobs incorrectly asserts meets the qualifications for an independent community under *Tuck*.

<sup>7</sup> J. Wes Yoder, *Small town politics, Munford gears up for first municipal election*, Anniston Star, Oct. 13, 2002, available at <http://www.jaxnews.com/news/2002/as-talladega-1013-wyoder-2j12w2051.htm> (a printout of which is attached hereto at Exhibit A).

<sup>8</sup> No Census data set apparently measures the commuting patterns of residents in the incorporated municipality.

residents worked in the community,” as Jacobs suggests. *Jacobs Response* at 2. But, in fact, the Commission found the community, in that case, independent despite the small percentage of residents that worked within the community. The Commission held that “the fact that 46.5% of employment age residents” work in nearby urbanized area was a “significant” factor weighing against a grant. *Albemarle and Indian Trail* at ¶ 9(a). But, in assessing all the evidence, the Commission found the community independent by virtue of “the other *Tuck* factors.” *Id.*

Similarly, Jacobs’s focus on the 13 percent of the “working population” that actually worked in their hometown in *Coolidge and Gilbert, Arizona*, 11 FCC Rcd 3610 (1996), is also misleading. The Commission’s holding in that case placed no weight on this statistic. The Commission found, instead that “60% of the working population” was employed in close-in locations that were well outside the limits of a nearby major metropolis. The Commission also placed great weight on the fact that the municipality at issue was a “full service community that provides residents with libraries, water and sewer services . . . a complete array of parks and recreation,” as well as a 60-member police force, and a 25-member fire department, and was in the process of creating a local public transportation system. *Id.* at ¶ 8. By contrast, Munford is a limited service municipality that provides little beyond water service and insect spraying.

Jacobs also attempts to distract from the simple fact that Munford lacks any of its own local media. Instead, it attempts to claim that a newspaper focused on other communities in the same county, *The Daily Home*, has somehow been transformed into Munford’s own newspaper because it publishes stories about Munford from time to time.<sup>9</sup> But the analytic question under *Tuck* is : “whether the smaller community has its own newspaper or other media that covers the community's local needs and interests.” *Tuck* at ¶ 36 (emphasis added). Munford has none.

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<sup>9</sup> See *Jacobs Response* at 3.

Indeed, as shown in the web-pages to which Jacobs directs the Commission, this newspaper, proclaims allegiance to “Talladega, Pell City, Sylacauga” in its masthead, not Munford.<sup>10</sup> (A printout is attached as Exhibit B.) Munford is not one of the newspaper’s focus communities.

In fact, the *Anniston Star* newspaper has reported weekday sales in the Munford zip code (36268) of 358 copies.<sup>11</sup> Given the number of households – even in the larger Munford CDP – this figure represents a sizable rate of penetration. This fact belies Jacobs’s assertion that the Daily Home creates a separate Munford advertising market. *Jacobs Response* at 5. A newspaper advertiser interested in reaching Munford would likely advertise in the *Anniston Star* or miss a great number of readers.

Finally, Jacobs also misleads when it claims that Munford has its own health facilities. First, Jacobs states that Munford has two such facilities<sup>12</sup> when, in fact, the same facility has two separate telephone directory name listings for the same office. As demonstrated by the attached web-based telephone directory listings and the health center’s web site printout (attached hereto as Exhibit C), both of the claimed health facilities, Baptist Healthcare of Munford and the Munford Health Clinic, have the same address and phone number – albeit under two different names.<sup>13</sup> Moreover, the website listing for this practice (attached at Exhibit D) shows that a single primary care physician and a nurse practitioner provide care at this office. For specialist

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<sup>10</sup> <http://www.dailyhome.com/dh-index.htm> (visited June 23, 2005)

<sup>11</sup> See *Newsroom diversity report for The Anniston Star*, The John S. and James L. Knight Foundation, available at [http://www.powerreporting.com/knight/al\\_the\\_anniston\\_star.html](http://www.powerreporting.com/knight/al_the_anniston_star.html) (a copy of which is attached hereto at Exhibit C)

<sup>12</sup> *Jacobs Response* at 5.

<sup>13</sup> Whatever name is used, this doctor’s office is located at 48 N. Cedars Rd, Munford, and does business using telephone number 256-358-4553.

and/or hospital services, Munford residents must go elsewhere. The nearest elsewhere is in the adjacent Anniston Urbanized Area, which hosts the hospital closest to Munford.

It is true Munford has a primary care physician's office, as do many bedroom towns. But if that were sufficient to demonstrate the town's independence under *Tuck*, there would be few places that would not qualify as independent under *Tuck*. The reality is that the residents of Munford rely on the nearby Anniston Urbanized Area for a large volume of medical services that go beyond the routine care provided by a primary care physician for one simple reason – the nearest specialists and hospitals are located there.

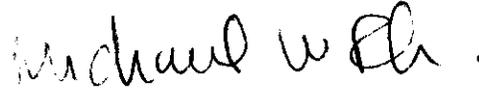
### **III. Conclusion**

Since Munford lacks the indicia of community independence required by *Tuck*, the *Jacobs Response* represents nothing more than an attempt to put a positive gloss on evidence that, when actually examined, fails to meet the requirements of *Tuck*. Sensational headlines and well-spun partial truths aside, Jacobs has not demonstrated – nor can it demonstrate – that Munford is anything more than a crossroads bedroom town.

Therefore, *Tuck* instructs that the Commission should not allow the reallocation of WTDR to Munford, as it would do nothing but facilitate the relocation of a station into the far more well-served Anniston Urbanized Area from Talladega, which would then lose its only FM service. Section 307(b) of the Communications Act demands nothing less.

For all the aforementioned reasons, the Commission should dismiss the petition for rule making and require WTDR to remain in Talladega.

Respectfully submitted,



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July 1, 2005

# EXHIBIT A

# ANNISTON STAR.com

<b>SECTIONS</b>
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## TALLADEGA COUNTY

### Small town politics: Munford gears up for first municipal election

**J. Wes Yoder**  
Star Staff Writer  
10-13-2002

#### MUNFORD

For some people, it is hard to tell if it is better to live in a town or if it is better to live in a city. Kenneth Parnell, a 61-year-old, lifelong resident of the town of Munford, could only speculate about the bad and the good.

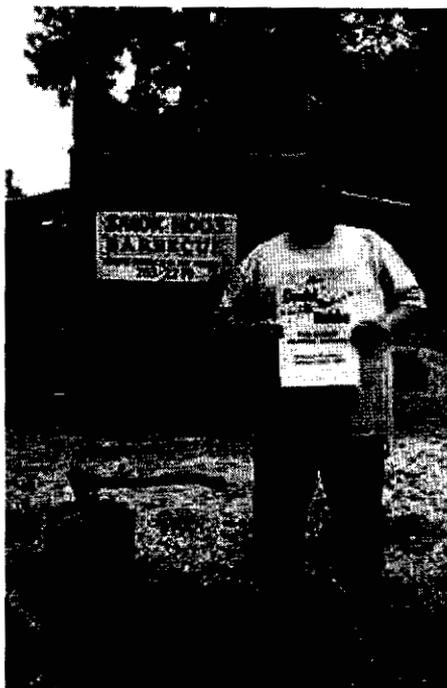
Living in a city, he said, "makes taxes go higher."

But in a small town like Munford, "You got to go all the way to Talladega to go to the skate ring. We ain't got but two service stations," Parnell said.

Around here, he said, all people do "is go squealing their tires."

Since Aug. 20, when Munford became incorporated as a city by a vote of the people, life hasn't changed a bit. And with the first-ever elections for mayor and city council of Munford coming up on Oct. 22, candidates and residents alike are unsure if change will bring improvement or headache, or if any noticeable change will come at all.

"Everybody's got to work together as a group," said David "Rerun" Dabbs, owner of Dabb's auto service and



David 'Rerun' Dabbs holds a campaign flier as he stands in front of his barbecue restaurant in Munford. Dabbs is running for city council. Photo: J. Wes Yoder/The Anniston Star

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Past 24 Video

Big Daddy's BBQ, and one of three candidates for council seat 3. To get the city started off on the right foot, he said, "We'll try to get some good people in there."

Dabbs said he is running for council because he believes in the future of Munford. Dabbs has lived in Munford his whole life and always has had to travel to Talladega or Oxford to go to a movie theater. The last one in Munford, a walk-in cinema, was knocked down by a tornado in 1957, before he was born.



Willie McKinney has a sign supporting Melvin Higgins for Munford City Council in his front yard. Photo: J.Wes Yoder/The Anniston Star

"It (Munford) needs to grow for the youth," he said. "We need something for them to do, maybe a park."

Dabbs is a 35-year-old mountain of a man who puts people at ease with his easygoing voice. One of Dabbs' opponents, Jim Lackey, is a regular customer at Big Daddy's. The two men discuss visions for an improved Munford over a plate of chopped pork that can make a man forget political competition ever mattered much. Beneath the menu by the order window, Lackey's campaign flyer is tacked to the wall.

Dabbs admits that the new mayor and council members will be learning as they go. A meeting place for the new council has not been determined, but Dabbs figures the new leaders will meet in the Munford clubhouse for a while. Changes, Dabbs said, probably will come slowly.

"A lot of people think we're gonna have police protection right off the bat," he said. "But it's gonna take time."

Charles Rollins, a 61-year-old plumber, had never considered being a political man until a month ago when some friends suggested he run for mayor.

"Since they're incorporating, I might as well run," he said.

With the petition for Munford's incorporation not filed until June of this year, and the vote on the matter coming two months later, Rollins and his four opponents for Munford mayor are charged with convincing residents quickly that, if elected, they will help preserve the characteristics of a small town while taking small, well-thought steps toward change. The vote to become a city revealed that nearly half of the voters think the grass is plenty green on the old side of incorporation - 187 for, 164 against.

Now, campaign platforms are being braced by issues of public safety,

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entertainment for the youth, entertainment for the elderly, local business support and preservation of the community's family-oriented tradition.

To get their message out, Dabbs and Lackey have been handing out flyers at Friday night football games. But Rollins has been too busy trying to earn a buck to do a lot of stumping. He has a couple of volunteers who go door-to-door on his behalf.

Rollins, a former carpenter, mechanic, electrician and bookkeeper, believes the strength of Munford is the community's families, safe and sound from any legislation handed down from the clubhouse, the Statehouse or the White House.

Here, he said, most people work with their hands - fixing fenders, tightening faucets, swinging hammers, scooping Brunswick stew - living paycheck-to-paycheck. Their hands are chapped, callused and arthritic, and most do not hold a lot of wealth. But when someone is in trouble, neighbors help. Only an empty hand is worth lending anyway.

That spirit, Rollins said, "Lord no, that won't change."

Willie McKinney, who does part-time lawn care and makes art out of scrap metal, has three crooked fingers on his right hand. He lost two to frost bite. He sat on his porch last week with Kenneth Parnell, shaded by an old sack hanging from the rafter.

Parnell used a handsaw to put the final touch on a wooden trailer for McKinney's Snapper riding mower. There was no money exchanged, just some conversation about the upcoming elections and a few Basic cigarettes.

In the front yard is a hand-painted sign. It says, "Vote Vote Vote, Melvin Higgins for City Council."

"Melvin married my sister's daughter," McKinney said. "He just wants to help people down here; I hope he wins."

Higgins also is running for council seat 3, against Dabbs and Lackey.

"I like Rerun (Dabbs), too," McKinney said. "Everybody likes Rerun."

As in other small communities, long-time residents of Munford have little to hide. Word of love or fighting or unemployment or a pastor's Sunday message travels like wind through this city of 1,508 people. And in the upcoming elections, where the issues at stake are hazily defined, it is likely that voters will support the candidate who pumped gas with a smile as a boy, or who brought bread by with her momma on Christmas night, or who treated their daughter with respect at the Munford High School prom all those years ago.

Only rarely will there be any confusion about the true character of the candidate. Looking at a list of candidates for council seat 5, Parnell said, "Roy Crim. I know about three Roy Crims."

But Parnell said he is too unsure about benefits and drawbacks of Munford's incorporation to cast a vote.

"Last time I voted," Parnell said, "I voted for George Wallace."

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**Candidates for Mayor:**

Marcus C. Bannister

Eugene Brown

Jerry M. Elder

Charles Rollins

Donald Swinford

Duane Stephens

**Candidates for Council:**

Seat 1-

Jerry M. Elder

Guy Knight

Ethridge F. Smith

Seat 2-

James Swinford

Seat 3-

David "Rerun" Dabbs

Melvin Higgins

Jim Lackey

Seat 4-

Roy Crim

Robert M. Helms

Phillip W. McWilliams

Jimmy Lee Thomas Jr.

Seat 5-

Patsy R. Herd

James Truman Hester

Amy Smith

Allen W. Weldon

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Sylacauga News Editor-Bureau manager: Denise Sinclair 256-249-4311  
Features Editor: Laura Nation 256-299-2115  
Sports Editor: Will Heath 256-299-2132  
Special Projects Editor: Jim Smothers 256-299-2128  
Business Manager: Barbara Wilson 256-299-2160  
Advertising Director: Pam Adamson 256-299-2140  
Retail Sales Manager: Sandy Carden 256-299-2141  
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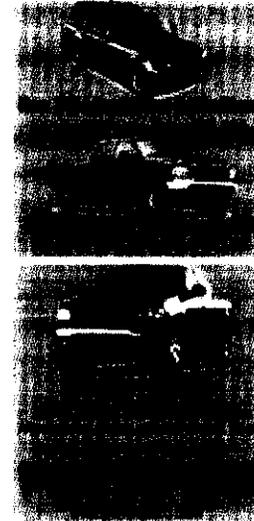
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## EXHIBIT C



Comparing the racial diversity of the journalists  
at America's daily newspapers  
with the communities that they serve

## Newsroom diversity report for

### The Anniston Star

Anniston, Alabama

Owner: Consolidated Publishing (Ala.)

From a report for the Knight Foundation  
by Bill Dedman and Stephen K. Doig, June 2005

[Click here to read the national report or to select another newspaper](#)

Year	Non-white % of newsroom staff
2005	Did not report
2004	Did not report
2003	11.1
2002	5.0
2001	Did not report
2000	10.5
1999	12.0
1998	8.1
1997	5.1
1996	7.3
1995	Did not report
1994	6.8
1993	10.0
1992	8.5



See the notes and definitions section below for the sources of these figures.

### Newsroom Diversity Index for The Anniston Star

Year	Non-white % of newsroom staff	Non-white % of circulation area	Newsroom Diversity Index (parity=100)
<b>2005</b>	N/A	20.7	N/A
<b>2004</b>	N/A	21.7	N/A

**How the index is calculated**

The Newsroom Diversity Index is the non-white percentage of the newsroom staff divided by the non-white percentage of residents in the circulation area.  
(Parity = 100.)

**Company index**

This newspaper's owner, Consolidated Publishing (Ala.), has a companywide, circulation-weighted Diversity Index of 0.

See the notes and definitions section below for the sources of these figures.

### Peer group comparison for The Anniston Star

This paper

Peer group

The median Diversity Index is 44 for all newspapers reporting in this circulation category of 25,001 to 50,000 daily sales.

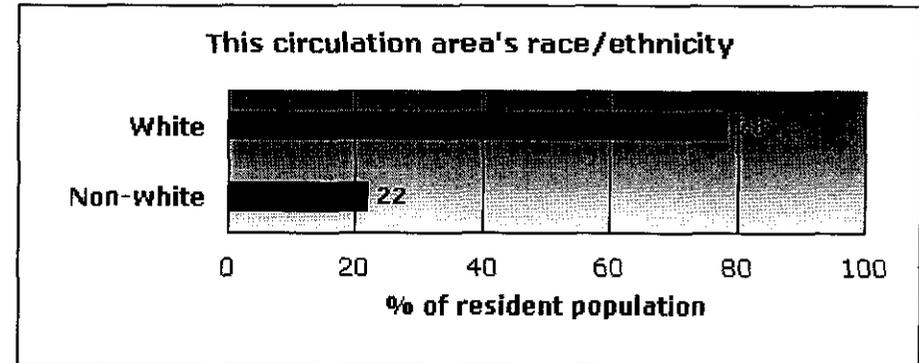
An example of a newspaper of similar circulation, in an area of similar level of non-white residents, but one that has a relatively high Diversity Index, is The Jackson Sun, Tennessee, with a 37.5 percent non-white staff in a community that is 24.7 percent non-white. Its index is 152.

FYI, in circulation, this newspaper's average weekday circulation of approximately 25,310 ranks 392 out of 1,410 daily newspapers in the US.

See the notes and definitions section below for the sources of these figures.

### Details on race/ethnicity in the circulation area and the home county of The Anniston Star

Race/ethnicity	Circulation area	
	% of population	Number of residents
Hispanic	1.5	2,490
Black	18.6	31,116
Asian and Pacific Islander	0.5	795
Native-American	0.3	540
Other non-white	0.1	105
Multi-racial	0.8	1,333
Non-white	21.7	36,379
White	78.3	131,228
<b>Total</b>		<b>167,607</b>



Race/ethnicity	Home county: Calhoun	
	% of population	Number of residents
Hispanic	1.6	1,753
Black	18.5	20,725
Asian and Pacific Islander	0.6	699
Native-American	0.4	427
Other non-white	0.1	85

<b>Multi-racial</b>	0.9	962
<b>Non-white</b>	22.0	24,651
<b>White</b>	78.0	<u>87,598</u>
<b>Total</b>		<u>112,249</u>

The home county of this newspaper is Calhoun.

## About this report

This third annual report for the Knight Foundation adds context to an annual survey by the American Society of Newspaper Editors. ASNE has set a goal that every newspaper, to help it know its community and gather the news, should employ at least one non-white journalist, and that newspapers should strive to employ non-whites in proportion to their share of the community. ASNE's report, at [www.asne.org](http://www.asne.org), shows each newspaper's non-white employment, but does not disclose how closely that employment mirrors the newspaper's circulation area.

That gap is filled by the report you are reading now. This report was not done by ASNE, but was done for the Knight Foundation by Bill Dedman and Stephen K. Doig. It shows how close each newspaper is to ASNE's goal, by comparing the newsroom staffing with the circulation area population. The full report is at [www.asu.edu/cronkite/asne](http://www.asu.edu/cronkite/asne).

## Notes and definitions

1. The Newsroom Diversity Index is the non-white percentage of the newsroom staff divided by the non-white percentage of the circulation area's residents. Parity = 100.
2. Source for staffing: Survey by American Society of Newspaper Editors, April 2005. Newspapers report non-white staff as of the end of the previous year.
3. Following ASNE's definition, newsroom staff includes only supervisors, reporters, editors, copy/layout editors and photographers.
4. Also following ASNE's definition, "whites," "blacks," etc., exclude Hispanics, who are counted in a separate category.
5. Source for boundaries of this newspaper's circulation area: ZIP Code circulation data, Audit Bureau of Circulations, latest available.
6. A paper may define its circulation area differently for marketing efforts, or news coverage, or to set advertising rates.
7. If ZIP Codes or counties are used, this report applies a threshold: 10 percent household penetration is required to include an area in the circulation area.
8. Source for the demographics of residents of that circulation area: US Census 2000.
9. Source for total circulation: Editor & Publisher magazine, Monday-Friday average at year-end 2004.
10. Staff of non-English publications, such as the Miami Herald's El Nuevo Herald, are excluded from the ASNE staffing survey for the first time this year.

## Demographics of ZIP Codes where sales were reported by The Anniston Star

Note that some ZIP Codes listed here may not have been included in determining the newspaper's circulation area. In calculating the Diversity Index, a ZIP Code was included only if the household penetration was at least 10 percent. Any lower-penetration ZIP Codes are also listed here for your information. Also, if the newspaper reported more than 300 ZIP Codes, only the top 300 in weekday sales are listed here.

ZIP / City / State / Approx. distance in miles from the newspaper's home office	Weekday sales	Households	Penetration % (daily sales per 100 households)	Median household income	Non-white % of population	Hispanic % of population	Black % of population	Native % of population	Asian % of population
36201 / Anniston / AL / 4.7 mi.	3,796	8,924	42.5	\$20,838	48.6	1.2	45.8	0.4	0.2
36207 / Anniston / AL / 7 mi.	3,505	7,580	46.2	\$36,705	20.5	1.4	17.5	0.3	0.8
36203 / Oxford / AL / 7.7 mi.	3,300	6,526	50.6	\$38,267	16.4	3.0	11.6	0.3	0.7
36265 / Jacksonville / AL / 9 mi.	2,589	6,240	41.5	\$29,541	17.4	1.6	13.3	0.4	1.0
36206 / Anniston / AL / 2.4 mi.	2,279	4,827	47.2	\$36,167	21.6	1.9	17.2	0.4	1.1
36272 / Piedmont / AL / 18.2 mi.	1,429	5,707	25.0	\$28,968	7.6	0.9	5.4	0.3	0.1
36264 / Hollis Crossroads / AL / 16.4 mi.	1,061	3,419	31.0	\$29,612	10.0	2.2	6.7	0.3	0.2
36277 / Weaver / AL / 3.9 mi.	790	2,007	39.4	\$37,524	13.6	1.6	8.1	0.4	1.9
36250 / Alexandria / AL / 3.3 mi.	740	1,539	48.1	\$41,126	6.8	0.6	5.0	0.3	0.5
36271 / Ohatchee / AL / 8.6 mi.	653	2,181	29.9	\$34,653	7.0	0.6	4.7	0.6	0.1
36266 / Watts Mill / AL / 29.9 mi.	555	2,230	24.9	\$25,876	24.1	2.0	20.8	0.3	0.2
36260 / Eastaboga / AL / 9.1 mi.	509	1,749	29.1	\$35,280	13.8	1.0	11.2	0.5	0.1
36274 / Rock Mills / AL / 45.3 mi.	464	4,447	10.4	\$29,943	31.0	0.9	29.2	0.1	0.3
35160 / Talladega / AL / 21.5 mi.	447	10,157	4.4	\$30,696	42.4	1.5	39.9	0.2	0.2
36278 / Wedowee / AL / 32.1 mi.	409	1,375	29.7	\$26,510	25.1	0.9	23.2	0.1	0.2
35096 / Lincoln / AL / 15.8 mi.	370	2,622	14.1	\$33,838	25.5	0.8	23.6	0.2	0.1
36251 / Idaho / AL / 28.7 mi.	364	2,080	17.5	\$28,292	16.3	2.5	12.8	0.3	0.1
36268 / Munford / AL / 13.2 mi.	358	2,124	16.9	\$36,978	22.7	0.5	20.8	0.3	0.1
36280 / Woodland / AL / 36.6 mi.	262	1,130	23.2	\$31,541	9.3	1.5	7.2	0.1	0.0
36279 / Wellington / AL / 9.6 mi.	261	997	26.2	\$33,207	4.8	0.7	3.0	0.5	0.2
35960 / Centre / AL / 30.1 mi.	199	3,890	5.1	\$30,227	9.3	0.7	7.4	0.3	0.2

36258 / Fishhead / AL / 19.7 mi.	184	639	28.8	\$34,063	6.7	1.8	3.2	0.8	0.1
36273 / Ranburne / AL / 27.2 mi.	154	1,060	14.5	\$31,343	1.4	0.8	0.0	0.3	0.1
36276 / Wadley / AL / 41.8 mi.	114	999	11.4	\$26,685	28.0	1.5	25.5	0.2	0.1
36262 / Fruithurst / AL / 23.9 mi.	103	471	21.9	\$31,528	2.2	0.5	0.2	0.1	0.2
36255 / Mellow Valley / AL / 33.9 mi.	82	363	22.6	\$27,424	2.0	0.0	0.6	0.8	0.0
36269 / Muscadine / AL / 26.7 mi.	69	515	13.4	\$30,901	0.9	0.2	0.1	0.0	0.1
35905 / Glencoe / AL / 15.3 mi.	63	2,209	2.9	\$39,491	3.3	0.4	1.5	0.4	0.3
35901 / Rainbow City / AL / 20 mi.	54	8,281	0.7	\$28,320	38.0	2.2	34.1	0.3	0.7
36263 / Hightower / AL / 33.2 mi.	47	253	18.6	\$28,875	20.0	1.3	17.5	0.0	0.9
35125 / Pell City / AL / 23.4 mi.	45	3,538	1.3	\$31,237	9.1	1.4	6.0	0.5	0.1
36205 / Fort Mc Clellan / AL / 3.5 mi.	34	9	377.8	\$32,250	15.8	0.0	0.0	0.0	15.8

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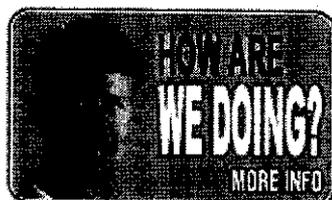
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## **BHC LOCATIONS**

### **Talladega County Locations**

#### ***BHC-Duke***

Family Practice  
 Professional Building  
 210 North Street, West  
 Talladega, AL 35160  
 Phone: 256-362-1966  
 Fax: 256-362-6017

#### Physicians

Warren C. Duke, M.D.

#### **Office Hours:**

Monday - Friday  
 8:00 a.m. - 4:00 p.m.

#### ***BHC-Lincoln***

Family Practice  
 47344 US Highway 78  
 Lincoln, AL 35096  
 Phone: 205-763-7848  
 Fax: 205-763-8068

#### Physicians

Chona C. Huang, M.D.

Stan Jett, M.D.

#### **Office Hours:**

Monday - Friday  
 8:00 a.m. - 5:00 p.m.

#### **Services Provided:**

Family practice, pediatrics, work injury, geriatrics

#### ***BHC-Munford***

Family Practice  
 48 N. Cedars Road  
 Munford, AL 36268

Phone: 256-358-4553

Fax: 256-358-2002

Physicians

Renee Davis, M.D.

Brenda Bynum, C.R.N.P.

**Services Provided:**

Family medicine, pediatrics, geriatric care and work injury

**Office Hours:**

Monday - Friday

8:30 a.m. - 5:00 p.m.

---

***BHC-Talladega***

320 East Coosa Street

Talladega, AL 35160

Phone: 256-362-3636

Fax: 256-362-0027

Physicians

Anne B. Davis, M.D. (Internal Medicine)

Jimmy Davis, M.D. (Internal Medicine)

Clay Davis, M.D. (Family Practice)

Andrew Huang, M.D. (Internal Medicine)

Mark Holbrook, M.D. (Family Practice)

Joan Patterson, C.R.N.P.

Fazal Rahim, M.D. (Neurology)

**Services Provided:**

Bone density, work injury, internal medicine, family practice, neurology and pediatrics.

**Office Hours:**

Monday - Friday

8:00 a.m. - 5:00 p.m.

---

***BHC-Talladega Pediatrics***

722 Stone Avenue

Talladega, AL 35160

Phone: 256-362-1725

Fax: 256-362-2070

Pediatricians

James Weems, Jr., M.D.

Edith Dela Cruz, M.D.

Muhammed Siddiqui, M.D.

**Office Hours:**

Monday - Friday

8:00 a.m. - 5:00 p.m.

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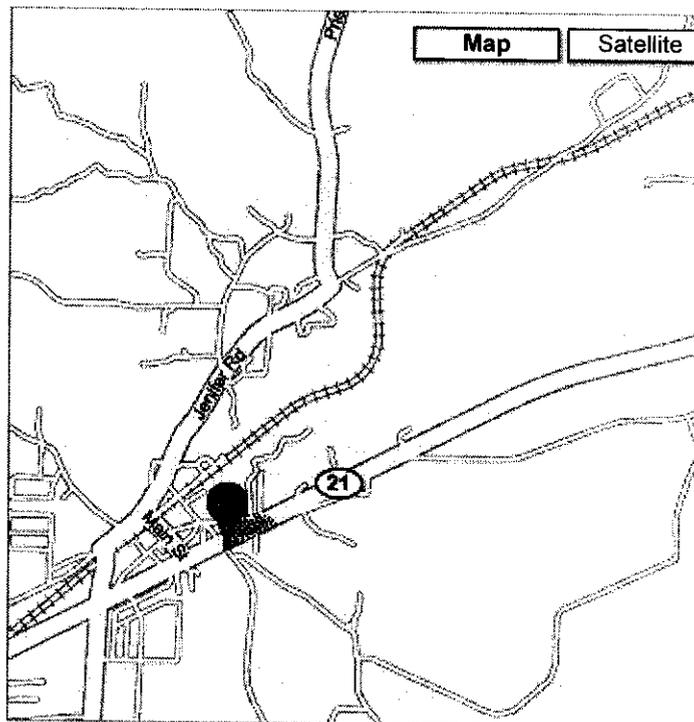
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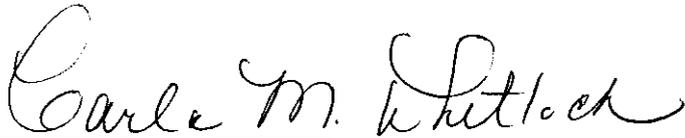
**CERTIFICATE OF SERVICE**

I, Carla M. Whitlock, a secretary at Fletcher, Heald & Hildreth PLC, hereby certify that a true and correct copy of the foregoing "REQUEST FOR LEAVE AND REPLY COMMENTS OF CALHOUN COMMUNICATIONS" was sent on this 1st day of July, 2005, via First-Class United States mail, postage pre-paid, or as otherwise noted, to the following:

Mark N. Lipp, Esq.  
Scott Woodworth, Esq.  
Vinson & Elkins, LLP  
1455 Pennsylvania Ave., NW  
Suite 600  
Washington, DC 20004

John A. Karousos\*  
Chief, Allocations Branch  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room 3-A266  
Washington , DC 20554

\* By Hand

  
Carla M. Whitlock  
Carla M. Whitlock

July 1, 2005