

Before the
Federal Communications Commission
Washington, DC 20554

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In the Matter of:

Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations)
(Charleston, Nashville, and)
Tellico Plains, and Knoxville, Tennessee))

MB Docket No. 05-273
RM-11273

Federal Communications Commission
Office of Secretary

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Filed With: **Office of the Secretary**

Directed To: **Assistant Division Chief, Audio Division**
Mass Media Bureau

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COUNTERPROPOSAL

Georgia-Carolina Radiocasting Company, LLC ("GCR"), by its attorney, hereby submits a Counterproposal to the Notice of Proposed Rule Making issued in this proceeding on September 27, 2005. In lieu of the proposed allotment of Channel 250A to Charleston, Tennessee, it requested that the Commission amend the FM Table of Allotments as follows:

<u>Community</u>	<u>Current</u>	<u>Proposed</u>
Tellico Plains, TN	—	250A
Knoxville, TN	248C, 276C, 283A, 299C	248Co, 276C 283A, 299C

In support thereof, the following is stated:

In order to accommodate the new proposed allotment, GCR proposes the downgrade of Station WJXB-FM, Knoxville, Tennessee. The current Station WJXB-FM license specifies an operation of 100 kW at 395 meters HAAT, which is below the minimum Class C antenna height requirements of 451 meters HAAT. 47 C.F.R. §

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73.211(a)(2). Section 316(a) of the Communications Act, as amended, permits the Commission to modify an authorization if such action is in the public interest. Because Station WJXB-FM is operating below minimum Class C standards, it properly is subject to reclassification as a "Class C0" facility. *See 1998 Biennial Regulatory Review – Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules*, 15 FCC Rcd 21,649 (2000) ("Second Report and Order"), and Section 1.420(g), n.2, and Section 73.3573, n.4 (47 C.F.R. §§ 1.420(g), n.2 and 73.3573 n.2), of the Commission's Rules. Pursuant to the Commission's rules, the reclassification of a Class C FM station to a Class C0 station may be initiated through the filing of a petition for rule making to amend the FM Table of Allotments. In instances where an initiating petition proposes both to amend the FM Table of Allotments and to reclassify a Class C FM station, the Commission will issue an order to show cause, as set forth in Section 73.3573, note 4, of the Commission's rules. A petitioner proposing both amendment of the FM Table of Allotments and reclassification of a Class C FM station must certify that no alternative channel is available for the proposed service. *Reclassification of License of Station KMMZ-FM, Enid, OK*, DA 03-1121 (Ass't Chief, Audio Div., May 9, 2003). As seen in the attached Technical Comments, that certification can accurately be made in this case – no Class A channel other than Channel 250A is available for service at Tellico Plains. Therefore, issuance of an "Order to Show Cause" requiring the licensee of WJXB-FM to show cause why its authorization should not be modified to specify operation on Channel 248C0 in lieu of Channel 248C is appropriate.

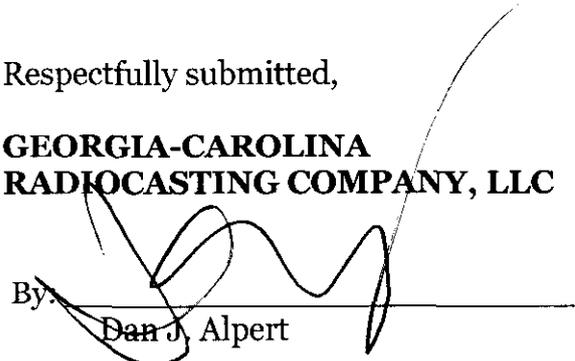
Tellico Plains is an incorporated community, listed in the U.S. Census with a 2000 population of 859 persons. The town was incorporated on July 4, 1911.

Adoption of this proposal will be in the public interest. Approval of this proposal will allow first new local service to Tellico Plains, Tennessee. GCR pledges expeditiously to apply for and to construct this proposed facility when this proposal is granted by the Commission.

Accordingly, Georgia-Carolina Radiocasting, LLC respectfully requests that this Petition be adopted; that the Commission issue an "Order to Show Cause" with respect to the licensee of Station WJXB-FM with respect to the proposed downgrade of Station WJXB-FM; and subsequently, that the Commission place this proposal on *Public Notice* for comment to amend the FM Table of Allotments as specified above; and accept comments thereon.

Respectfully submitted,

**GEORGIA-CAROLINA
RADIOCASTING COMPANY, LLC**

By: 
Dan J. Alpert

Its Attorney

*The Office of Dan J. Alpert
2120 N. 21st Rd.
Arlington, VA 22201*

703-243-8690

November 14, 2005

Engineering Statement
November 11, 2005

Counterproposal Petition to Amend the FM Table of Assignments:

As a counterproposal to the proposed allocation of channel 250 A, 97.9 MHz, Charleston, Tennessee, Georgia-Carolina Radiocasting proposes the addition of FM channel 250 A, to Tellico Plains, Tennessee.

On behalf of Georgia-Carolina Radiocasting we have determined that Channel 250, can be allotted to Tellico Plains, Tennessee with a site restricted to 14 kilometers west of the center city reference coordinates. We performed a full search of the FM band and could find no other open channel than channel 250 that would serve Tellico Plains. The coordinates of the proposed allocation are N. Lat. 35 20 20, W. Long. 84 26 46. The computer channel study in Attachment A lists the minimum spacings required for the allocation of new FM stations as per the requirements of section 73.207 of the Commission's rules. This attachment also shows the minimum spacings graphically as separation circles. The proposed allocation will meet all required spacings to existing allocations, applications and licensed FM stations. This map shows that the, class A, 16 km city signal distance circle will entirely encompass Tellico Plains.

The allocation will provide a first local service to Tellico Plains, Tennessee, population 859. A total of 40,691 people will be served within the 3.16 mV/m signal contour. 98,503 people will be served within the 1 mV/m signal contour of the proposed allotment. Georgia-Carolina Radiocasting declares its intent to be a bidder for the proposed channel if its Petition is acted upon favorably by the Commission.

This Petition proposes the downgrade of WJXB-FM from a class C to C0.¹

The channel-study attached shows that all minimum spacings will be met by the proposed class A station and that it provides 100% coverage to the area and population of Tellico Plains. Attachment B is a full-facility class A coverage map showing the locations of the 60 and 70 dBu signal contours. Attachment C is a statement of my qualifications which are a matter of record at the Federal Communications Commission.

Signed,



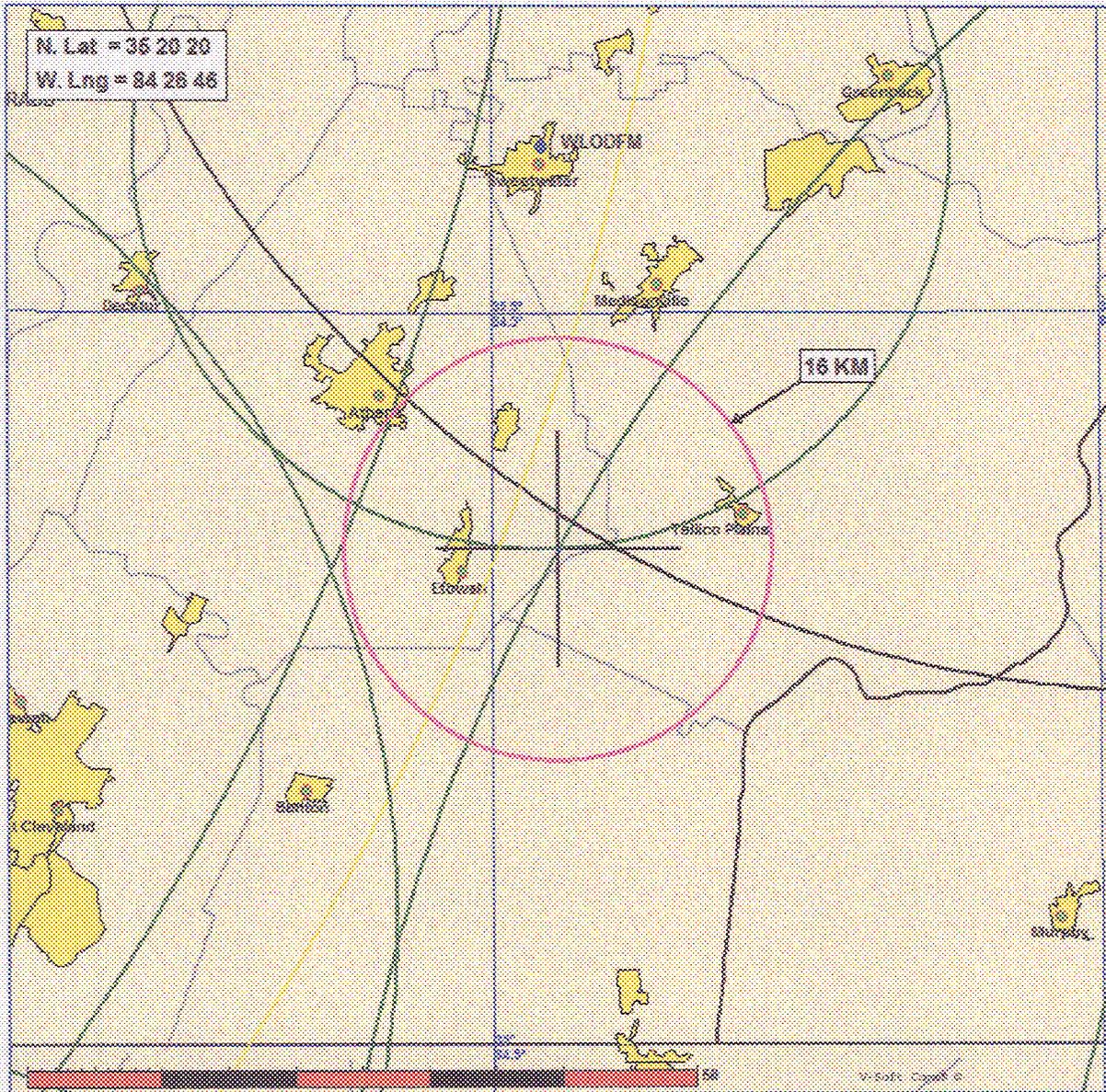
Doug Vernier

¹ Gateway Radio Works has also proposed this downgrade in its Petition to assign channel 249A to Livingston, KY

CH 250 A, 97.9 MHz

GA-Carolina Radiocasting

Attachment A



Call	CH#	Type	Location		Azi	D-KM	FCC	Margin
WJXB-FM	248C*	LIC	Knoxville	TN	31.7	87.79	85.5	2.29
WLODFM	252A	LIC	Sweetwater	TN	357.8	30.50	30.5	0.00
WHZT	251C0	LIC	Seneca	SC	118.2	151.53	151.5	0.03
RADD	248C0	ADD	Knoxville	TN	31.7	87.79	85.5	2.29
RDEL	250C	DEL	Nashville	TN	290.8	229.64	225.5	4.14
RADD	250C0	ADD	Nashville	TN	290.8	229.64	214.5	15.14
WSIX-FM	250C0	LIC	Nashville	TN	290.8	229.64	214.5	15.14
WKXJ	251A	LIC-Z	Signal Mountain	TN	251.7	88.00	71.5	16.50
WKXJ.C	251A	CP N	Signal Mountain	TN	251.7	88.00	71.5	16.50
WHZT.C	251C1	CP -Z	Seneca	SC	112.4	182.26	132.5	49.76
WKCK	249C3	LIC-Z	Rome	GA	210.5	141.94	88.5	53.44
WMAX-FM	247C2	LIC	South Pittsburg	TN	249.7	115.50	54.5	61.00
WPEG	250C	LIC-D	Concord	NC	88.5	299.15	225.5	73.65
WGIC	253C2	LIC N	Cookeville	TN	314.4	128.40	54.5	73.90
AL253	253C0	RSV	Atlanta	GA	176.6	175.53	85.5	90.03
WSB-FM	253C0	LIC	Atlanta	GA	176.6	175.53	85.5	90.03

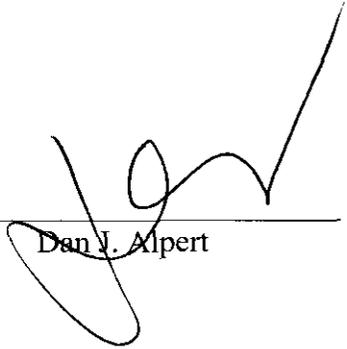
Call	CH#	Type	Location		Azi	D-KM	FCC	Margin
WHAY	252A	LIC	Whitley City	KY	359.9	146.71	30.5	116.21
WVOKFM	250A	LIC	Oxford	AL	214.8	231.11	114.5	116.61
WKEAFC	252C3	CP -Z	Scottsboro	AL	236.7	161.54	41.5	120.04
RADD	249C2	ADD	Lexington	GA	139.3	231.21	105.5	125.71
WKEAFM	252A	LIC	Scottsboro	AL	239.8	163.83	30.5	133.33

(* indicates downgraded class C to C0 station)

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that copies of the forgoing have been sent via First Class Mail upon the following:

Kris R. Kendrick, Esq.
Post Office Box 82032
Athens, GA 30608-2032



Handwritten signature of Dan J. Alpert, written in black ink over a horizontal line. The signature is stylized and cursive.

Dan J. Alpert