

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)	MB Docket No. 05-263
FM Broadcast Stations)	RM-11269
(Grants and Church Rock, New Mexico))	

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

REQUEST TO CORRECT COORDINATES

College Creek Broadcasting, LLC, and Desert Sky Media, LLC (together, the "Joint Parties"), by their counsel, hereby request that the Commission correct the coordinates in its database for the allotments proposed in the Joint Parties' Counterproposal.¹ A search of the Commission's engineering database reveals that the Commission appears to have entered incorrectly the community reference coordinates (or other incorrect coordinates) for each of the Joint Parties' allotment proposals rather than the actual coordinates proposed by the Joint Parties. These coordinates should be corrected so that the existing or preferred transmitter sites in the Joint Parties' proposed allotments are protected and so that the public is on notice of the Joint Parties proposal.

¹ The Joint Parties filed a Counterproposal in this proceeding on October 17, 2005, and Reply Comments and Errata on November 1, 2005. In their Reply Comments and Errata, the Joint Parties amended their Counterproposal to (i) allot Channel 293C1 at Fredonia (instead of Channel 247C1), (ii) remove the proposal to allot Channel 237C at First Mesa, Arizona, and (iii) remove the proposal to allot Channel 278C2 at Teec Nos Pos, Arizona. These modifications removed the conflict with Petitioner's proposal to allot Channel 279C at Church Rock, New Mexico. All of these changes are reflected in the chart below.

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The corrected coordinates meet the spacing requirements in 73.207, whereas, in some instances, the coordinates entered by the Commission into its database do not meet the spacing rules. The following chart details the coordinates that the Joint Parties proposed:

PROPOSED ALLOCATION	CORRECT COORDINATES
Ely, NV (CH 256C)	39-14-51 N, 114-53-16 W
Moapa Valley, NV (CH 255C)	36-50-52 N, 114-28-37 W
Pioche, NV (CH 268C)	37-53-44 N, 114-34-41 W
Essex, CA (280B)	34-52-50 N, 115-04-05 W
Essex, CA (265B)	34-44-12 N, 115-14-48 W
Spring Valley, AZ (CH 266C)	34-15-03 N, 112-19-11 W
Payson, AZ (CH 240C1)	34-25-48 N, 111-30-16 W
Seligman, AZ (CH 239C3)	35-19-26 N, 112-45-55 W
St. Johns, AZ (CH 251C)	34-15-58 N, 109-35-11 W
Ash Fork, AZ (CH 277A)	35-16-13 N, 112-32-31 W
Desert Hills, AZ (CH 276C0)	34-32-43 N, 114-11-17 W
Bagdad, AZ (CH 299A)	34-33-25 N, 113-16-00 W
Meadview, AZ (CH 300C)	35-50-11 N, 114-19-08 W
Laughlin, NV (CH 285C2)	35-15-08 N, 114-44-58 W
Peach Springs, AZ (CH 267C3)	35-32-23 N, 113-26-33 W
Quartsite, AZ (CH 267C3)	33-39-50 N, 114-13-45 W
Kanab, UT (CH 276C)	37-02-51 N, 112-31-32 W
Hurricane, UT (CH 260C)	36-50-49 N, 113-29-28 W
Fredonia, AZ (CH 293C1)	36-53-00 N, 112-11-40 W

PROPOSED ALLOCATION	CORRECT COORDINATES
Paulden, AZ (CH 228C3)	34-52-16 N, 112-33-00 W
Bagdad, AZ (CH 290A)	34-34-36 N, 113-10-29 W
Quartsite, AZ (CH 251C2)	33-36-49 N, 114-16-09 W

The incorrect coordinates have already caused a later filed application to appear to be short-spaced to the Joint Parties' proposal. *See* BPH-20051107AEH. As the attached channel study demonstrates, at the community reference coordinates entered by the Commission (which are the incorrect coordinates), an application filed by Station KKLD(FM), Mayer, Arizona, appears to be short-spaced to the Joint Parties' proposal to allot Channel 251C2 at Quartsite. *See* Exhibit 1. However, at the correct coordinates specified by the Joint Parties for Channel 251C2 at Quartsite (33-36-49 N, 114-16-09 W), the application filed by Station KKLD(FM) is not short-spaced. *See* Exhibit 2.

The Joint Parties also note that the Commission's engineering database contains the incorrect channel for the Joint Parties' proposal for Peach Springs, Arizona. The Joint Parties proposed to allot Channel 267C3 to Peach Springs, but the Commission's database contains Channel 276C3. Thus, the Joint Parties also request that the Commission correct this error.

WHEREFORE, the Joint Parties respectfully request that the Commission correct the coordinates and the Peach Spring channel in its engineering database for the Joint Parties' proposal.

Respectfully submitted,

MARATHON MEDIA GROUP, LLC

DESERT SKY MEDIA, LLC

By: Mark N. Lipp

Mark N. Lipp

Scott Woodworth

Vinson & Elkins L.L.P.

1455 Pennsylvania Ave, NW, Suite 600

Washington, DC 20004-1008

(202) 639-6500

Their Counsel

February 10, 2006

EXHIBIT 1

Allocation Study

Ch 251C2 at Quartzsite, AZ at City Reference Coordinates

REFERENCE

33 39 49 N
114 13 44 W

CLASS = C2

Current Spacings

DISPLAY DATES

DATA 01-21-06

SEARCH 02-03-06

----- Channel 251 - 98.1 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
RADD	ADD 251C2	Quartzsite	AZ 0.00	0.0	190.0	-190.00
KLUK	LIC 250C1	Needles	CA 152.67	355.2	158.0	-5.33
KKLD.A	APP-N 252C	Mayer	AZ 183.39	69.2	188.0	-4.61
KKLD.A	APP-N 252C	Mayer	AZ 183.39	69.2	188.0	-4.61
AL252	RSV 252C	Mayer	AZ 188.11	69.1	188.0	0.11
ALLO	250A	Algodones	BN 116.87	204.2	105.0	11.87
KUPD	LIC 250C	Tempe	AZ 204.43	99.8	188.0	16.43
KRXV	LIC 251B	Yermo	CA 281.87	302.5	241.0	40.87
R---	252B	Rumorosa	BN 208.28	234.1	164.0	44.28

EXHIBIT 2

Allocation Study

Channel 251C2, Quartzsite, AZ (including the KKLD application)

REFERENCE

DISPLAY DATES

33 36 49 N

CLASS = C2

DATA 01-21-06

114 16 09 W

Current Spacings

SEARCH 02-10-06

----- Channel 251 - 98.1 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
RADD	ADD 251C2	Quartzsite	AZ 6.69	33.8	190.0	-183.31
KLUK	LIC 250C1	Needles	CA 157.94	356.7	158.0	-0.06
KKLD.A	APP-N 252C	Mayer	AZ 188.88	68.0	188.0	0.88
KKLD.A	APP-N 252C	Mayer	AZ 188.88	68.0	188.0	0.88
ALLO	250A	Algodones	BN 110.28	203.6	105.0	5.28
AL252	RSV 252C	Mayer	AZ 193.61	68.0	188.0	5.61
KUPD	LIC 250C	Tempe	AZ 207.26	98.1	188.0	19.26
R---	252B	Rumorosa	BN 202.02	234.7	164.0	38.02
KRXV	LIC 251B	Yermo	CA 281.76	303.8	241.0	40.76
KIFM	LIC 251B	San Diego	CA 290.80	253.5	241.0	49.80

CERTIFICATE OF SERVICE

I, Scott Woodworth, in the law firm of Vinson & Elkins, do hereby certify that I have on this 10th day of February, 2006, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Request to Correct Coordinates**" to the following:

*R. Barthen Gorman
Federal Communications Commission
445 12th Street, SW
Room 2-B428
Washington, DC 20554

James P. Riley, Esq.
Fletcher, Heald & Hildreth, PLC
1300 North 17th Street, 11th Floor
Arlington, VA 22209
(*Counsel to Petitioner*)

Gla-Mar Broadcasting, LLC
1289 North 1500 East
Logan, UT 84341

Marissa G. Repp, Esq.
Hogan and Hartson, LLP
555 13th Street, NW
Washington, DC 20004-1109

Yavapai Broadcasting Corporation
3405 East Highway 89A
Building A
Cottonwood, AZ 86326

Route 66 Broadcasting, LLC
812 East Beale Street
Kingman, AZ 86402

Jeffrey L. Timmons, Esq.
Jeffrey L. Timmons, PC
3235 Satellite Blvd.
Bldg. 400, Suite 300
Duluth, GA 30096-8688
(*Counsel to KM Radio of St. Johns, LLC*)

David Oxenford
Davis Wright Tremaine LLP
1500 K Street, NW
Suite 450
Washington, DC 20005
(*Counsel to Canyon Media Corporation*)

Barry A. Friedman
Thompson Hine LLP
Suite 800
1920 N Street, NW
Washington, DC 20036
(*Counsel to Sierra H Broadcasting, Inc.*)



Scott Woodworth

* HAND DELIVERED