

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

RECEIVED & REGISTERED
MAY - 3 2006
FCC MAIL ROOM
MM Docket No. 04-305
RM-10980; RM-11329

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments, FM)
Broadcast Stations)
Oak Harbor and Sedro-Woolley, Washington)

To: The Secretary
Attn: Assistant Chief, Audio Division, Media Bureau

REPLY COMMENTS

Jodesha Broadcasting, Inc. ("Jodesha"), by its attorney, hereby files its Reply Comments in response to Public Notice Report #2770 released April 21, 2006 soliciting comments on the counterproposal that Jodesha submitted in this proceeding and the Public Notice released on that same date, Report #2769 soliciting comments on the counterproposal submitted in this proceeding by Bible Broadcasting Network, Inc. ("BBN").

On October 15, 2004, BBN filed Reply Comments in this proceeding opposing Jodesha's counterproposal to allot Channel 289A to Sedro-Woolley rather than Oak Harbor. BBN's opposition to Jodesha's counterproposal was based on the theory that because Sedro-Woolley is part of an urbanized area which is designated "the Mount Vernon, Washington, Urbanized Area," by the U.S. Census Bureau, "Jodesha was required to submit in its counterproposal a showing ["Tuck Analysis"] pursuant to *Faye and Richard Tuck* [3 FCC Rcd 5374 (1988)]" ["Tuck"] (emphasis added). BBN further claimed that that it was too late in the proceeding

No. of Copies rec'd 045
List ABCDE

for Jodesha to submit a *Tuck Analysis*.¹

BBN's contentions that Jodesha's counterproposal was deficient because it failed to include a *Tuck Analysis* is clearly incorrect. The Allocation Branch's "policy has consistently been not to apply the *Huntington* and *Tuck* test to drop-in allotments in urbanized areas. *Report and Order, MM Docket 99-81 (Easton, Merced and North Fork)*, 15 FCC Rcd 5046 (Allocation Branch, 2000). Moreover, if the *Tuck* and the *Huntington Doctrine* which the Commission clarified and modified in that case were applicable to this proceeding, it clearly would not be too late for Jodesha to submit a *Tuck Analysis* as it was not obligated under *Tuck* to supply such an analysis unless and until an issue as to whether Sedro-Woolley qualifies for a first service preference was raised. As the Commission emphasized in *Tuck*, the *Huntington Doctrine* only applies to

those exceptional cases. . . [when] competing applications are filed for separate communities that are dependent upon, and contiguous to, a central city, and the applicants propose sufficient power to serve the entire metropolitan area, we treat the entire metropolitan area as one community for Section 307(b) purposes.

Tuck at ¶22. Significantly, the Commission stated in *Tuck*, at ¶24, that "[b]ecause *Huntington* is an exception to section 307(b), the party seeking to have us apply it against a competing

¹ The cases cited by BBN to support its contention that it is too late for Jodesha to submit a *Tuck Analysis* are inapposite as they merely stand for the general proposition that "counterproposals must be technically correct at the time of filing. BBN has cited no "technical" deficiencies in Jodesha's counterproposal.

applicant generally bears the burden of proof on this issue.

(Emphasis added).

It is thus clear that, assuming *arguendo* that *Tuck* is applicable to this proceeding (i) the fact that Sedro-Woolley is located in an urbanized area which has been designated with the name of a different community within the urbanized area, Mount Vernon, did not require Jodesha to submit a *Tuck Analysis* as part of its counterproposal² and (ii) the burden was upon BBN to establish that the *Huntington* doctrine, as clarified and modified by *Tuck* should apply in this case.³ Jodesha believes that since BBN failed to submit any of the evidence that the Commission traditionally considers in determining whether the *Huntington* doctrine should apply in a specific case, it is BBN's challenge to the presumption that Jodesha's counterproposal is entitled to a first local service preference that is deficient. Nevertheless, since the issue of whether the *Huntington* doctrine should be applied against Jodesha's counterproposal has been raised, and on the chance that the Allocation Branch may wish to revisit its

2 There is nothing in *Tuck* or in *Huntington Broadcasting Co. v. FCC*, 192 F. 2d (D.C. Cir. 1951) to suggest that any time an applicant or a petitioner for an FM or TV channel allotment submits a proposal for a station that would serve a community within an urbanized area which is not the "central community" and its proposal would provide service to serve substantially the entire urbanized area that the applicant or petitioner must submit a *Tuck* analysis in order for its proposal to be considered. And to require such a showing in all such cases, absent a *prima facie* showing that the specified community is in fact "dependent upon" a central community, would be unduly burdensome on applicants and petitioners and a waste of their resources.

3 The reason that BBN did not submit a *Tuck Analysis* to support its claim that Jodesha's counterproposal was not entitled to a first service preference is obvious. Had it submitted a *Tuck* analysis, that analysis would have shown that Sedro-Woolley is a community entirely independent of Mount Vernon as the *Tuck* analysis submitted herein establishes.

policy against applying the *Huntington Doctrine* and *Tuck* to drop-in allotments in urbanized areas, Jodesha submits the following *Tuck Analysis*.

As a preliminary matter, Jodesha submits that Mount Vernon (pop. 26,232) is not the "central community" in the urbanized area comprised of that community, Sedro-Woolley (pop. 8,658) and Burlington (pop. 6,757).⁴ While Mount Vernon is the largest of these three communities, its population accounts for only five-eighths of the population of the three communities combined. The three communities are situated on or near Interstate 5 between 20 and 30 miles south of the much larger community of Bellingham (pop. 67,171) and just north of the Seattle-Tacoma SMSA. In so far as any of these communities are "dependent" upon a "central community," that community is the Seattle-Tacoma SMSA.

Tuck Criteria

1. The extent to which residents of Sedro-Woolley work in Mount Vernon rather than Sedro-Woolley.

While many people who live in Sedro-Woolley work in other communities, they do not commute to any one city for work. Those who work outside Sedro-Woolley may work anywhere between Bellingham and Seattle. See Statement under penalty of perjury of Sharon Dillon, Mayor of Sedro-Woolley attached as Exhibit A hereto.

⁴ Population figures are from 2000 US Census.

2. Local Media.

Sedro-Woolley has its own weekly newspaper, the *Courier Times* which covers local community issues and events. Sedro-Woolley has no local radio stations but receives service from five commercial radio stations, a non commercial radio station and two television stations licensed to Bellingham and two commercial radio stations and two non commercial radio stations licensed to Mount Vernon.⁵

3. Whether community leaders and residents perceive of Sedro-Woolley as being an integral part of, or separate from, the larger metropolitan area.

Sedro-Woolley has a long history as an independent community with its own local government. It was incorporated in 1898 with the merger of two separate communities, Sedro and Woolley. Community leaders of Sedro-Woolley and the residents of the community see the community as one that is separate and distinct from the larger urbanized area, comprised of other small and distinct communities, of which it is a part. See Exhibit A.

4. Whether Sedro-Woolley has its own local government and elected officials.

Sedro-Woolley has had its own local government with elected officials since it was incorporated in 1898. Currently it has a mayor - city council form of government with an elected

⁵ Official notice can be taken of the Commission's records reflecting the broadcast stations which are licensed to Bellingham and Mount Vernon.

mayor and 7 elected councilpersons.

5. Whether Sedro-Woolley has its own local telephone book or zip code.

Sedro-Woolley has its own zip code, 98284. Verizon provides the local phone service to Skagit and San Juan Counties. The Verizon Telephone Directory front cover reads: SKAGIT AND SAN JUAN COUNTIES Including: (and here it lists, ALPHABETICALLY, 32 communities from Alger to Van Horn, including Mt. Vernon and Sedro-Woolley). Then the white pages co-mingle all 32 communities in a single alphabetical listing.

6. Whether Sedro-Woolley has its own commercial establishments, health services, and transportation system.

Sedro-Woolley has its own local chamber of commerce and there are numerous commercial establishments and numerous health care facilities located in Sedro-Woolley. Listings of the commercial and professional establishments, community organizations and health care facilities which are members of the Sedro-Woolley Chamber of Commerce are attached as Exhibits B hereto. Neither Sedro-Woolley nor Mount Vernon have their own transportation system. Both are served by a county-wide Skagit Transit, a county-wide transportation system with routes that go from Anacortes on the west, to Mt. Vernon, Sedro-Woolley and then continue to the east end of the county.

7. The extent to which Sedro-Woolley and Mount Vernon are part of the same advertising market.

Sedro-Woolley and Mount Vernon, along with Burlington and other communities between the Seattle SMSA and Bellingham, are part of the same advertising market.

8. The extent to which Sedro-Woolley relies on Mount Vernon for municipal services

Sedro-Woolley has its own police department, fire department, Public Library, City Attorney, Code Enforcement Officer, Cemetery, Municipal Court, City Planner, Sewer & Wastewater Plan, and Solid Waste Utility. Sedro-Woolley receives no municipal services from Mount Vernon.

Conclusion

Under stated Allocation Branch policy, the fact that Sedro-Woolley is located in an urbanized area does not raise a question under the *Huntington Doctrine* and *Tuck* as to whether Jodesha's counterproposal to allot Channel 289A to that community is entitled to a first local service preference. Moreover, even if the *Huntington Doctrine* and *Tuck* were applicable to this proceeding, as demonstrated herein, Sedro-Woolley is a community separate and independent from Mount Vernon and Jodesha's counterproposal to allot channel 289A to Sedro-Woolley as that community's first local service is to be preferred over the

proposal to allot that channel to Oak Harbor as that community's second local outlet.

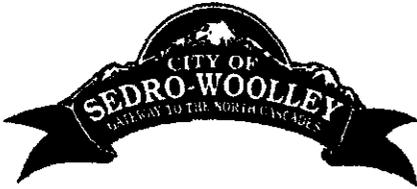
Respectfully submitted,



David Tillotson
4606 Charleston, Terrace, N.W.
Washington, DC 20007
Tel: 202/625-6241
Email: dtlaw@starpower.net

**Attorney for Jodesha Broadcasting,
Inc.**

Date: May 1 2006



CITY OF SEDRO-WOOLLEY
Sedro-Woolley Municipal Building
720 Murdock Street
Sedro-Woolley, WA 98284
Phone (360) 855-1661
Fax (360) 855-0707

Sharon Dillon
Mayor

April 25, 2006

To Whom it May Concern:

1. I am Sharon Dillon, Mayor of the City of Sedro-Woolley, Washington. My business address is City of Sedro-Woolley, 720 Murdock Street, Sedro-Woolley, WA 98284. The City of Sedro-Woolley is a municipal corporation under the laws of the State of Washington.

2. I have lived in the Sedro-Woolley community since 1973. Sedro-Woolley had its origins as a logging town in the Upper Skagit Valley, while the other local communities developed as farming or commercial centers. The residents of the City of Sedro-Woolley see themselves as a separate and distinct community from the other communities in Skagit County, such as Mount Vernon, Burlington or Anacortes. We have our own schools, holidays, employment, and traditions. The people of Sedro-Woolley have a great deal of local pride in our community as a unique place with its own history and industry. We have had our own newspaper for 100 years.

3. While many people who live in Sedro-Woolley work elsewhere, they do not commute to any one city for work. Those who work outside of Sedro-Woolley may work anywhere between Seattle and Bellingham. Boeing in Everett is apparently our largest outside employer. Under my term of office, the City is working hard to preserve our unique identity.

4. Sedro-Woolley would benefit from having the FCC allocate a radio frequency to Sedro-Woolley that had good local reception on a 24 hour basis. A local station would be a valuable community asset.

5. I support the creation of a local radio frequency. However, it is not my intention that such a radio frequency be allocated to Sedro-Woolley if, for any reason, it displace an existing station or frequency.

I certify that the forgoing is true and correct to the best of my knowledge and belief, under penalty of perjury pursuant to the laws of Washington this 25 day of April, 2006, at Sedro-Woolley, Skagit County, Washington.


SHARON DILLON

EXHIBIT B

**Sedro-Woolley Chamber of Commerce Members
located within the City of Sedro-Woolley
Retail & Service**

Auto Dealers, Parts & Service

Countryside Chevrolet (Email) - (360) 855-0321
221 Woodworth, Sedro-Woolley, WA 98284

Madd Motorsports (Email) - (360) 855-9892
319 Township St Sedro-Woolley, WA 98284

Mike and Son Auto Sales, Inc. - (360) 855-1974
203 Ball St, Sedro Woolley Wa 98284

Northwest Tinman (Email) - (360) 856-4279
307 W State St Sedro-Woolley, Wa 98284

North Cascade Ford Mercury - (360) 855-1551 FAX (360) 855-0718
116 W Ferry St Sedro-Woolley, Wa 98284

Felton 's Auto Repair - (360) 856-2866
1419 AE, State Street, Sedro-Woolley, WA 98284

Herb's Chevron & Towing - (360) 855-9907
224 E. Ferry Street, Sedro-Woolley, WA 98284

North Cascade Quick Lube - (360) 855-0418
205 Township St., Sedro-Woolley, WA 98284

Pat Rimmer Les Schwab Tire Center, Inc. - (360) 855-1033
204 W. Moore Street, Sedro-Woolley, WA 98284

Puget Sound Automotive (Email) - (360) 854-2043
647 Sunset Park Dr, Sui. F, Sedro-Woolley, WA 98284

Sedro-Woolley Auto Parts (Email) - (360) 855-0341
816 Murdock Street, Sedro-Woolley, WA 98284

Valley Auto Supply - (360) 855-0141
220 W. Ferry Street, Sedro-Woolley, WA 98284

Broadcast Equipment

Broadcast Tools - (360) 854-9559 Fax (360) 854-9479
131 State St., Sedro-Woolley, WA 98284

Computers

Computer Source Technologies - (360) 855-0730
702 C Metcalf, Sedro-Woolley, WA 98284

Floral

Sedro-Woolley Floral & Gifts (Email) - (360) 855-0610
823 Metcalf Street, Sedro-Woolley, WA 98284

Food and Restaurant:

Rivers Organica | marakesch@verizon.net (Email) - (360) 855-1688
301 A Washington St., Sedro-Woolley, WA 98284

Buzz Inn Steak House (Email) - (360) 854-9365
1975 Hwy. 20, Sedro-Woolley, WA 98284

Lorenzo's - (360) 856-6810
2079 Hwy 20 Sedro-Woolley, Wa 98284

Hal's Drive In (Email) - (360) 855-0868
321 State Street, Sedro-Woolley, WA 98284

Iron Skillet - (360) 855-0080
132 W. State Street, Sedro-Woolley, WA 98284

Joy's Sedro-Woolley Bakery & Cafe - (360) 855-0610
823 Metcalf Street, Sedro-Woolley, WA 98284

Papa Murphy's Pizza - (360) 856-5805
108 N. Township Street, Sedro-Woolley, WA 98284

McDonalds (Email)
1017 Hodgins St., Sedro-Woolley, Wa 98284

Pizza Factory - (360) 855-9600
714 Metcalf Street, Sedro-Woolley, WA 98284

State Street Deli - (360) 855-2917
420 State Street, Sedro-Woolley, WA 98284

Gasoline:

Associated Petroleum Products, Inc. (Cardlock)(360) 855-1741
700 Borseth Street, Sedro-Woolley, WA 98284

Trail Road Shell - (360) 856-4555
802 Highway 20, Sedro-Woolley, WA 98284

E&E Lumber - (360) 856-0825
201 w. state Street, Sedro-Woolley, WA 98284

Professional

Accounting/Tax Preparation:

All American Associates Accounting (Email)
420-C State St Sedro-Woolley, WA 98284

John J. Lee, C.P.A. - (360) 856-9996
1502 Hoehn Road, Sedro-Woolley, WA 98284

Attorneys:

William Allen, Attorney - (360) 855-1431
120 Woodworth Street, Sedro-Woolley, WA 98284

David D. Lowell, Attorney (Email) - (360) 855-1755
802 Metcalf Street, Sedro-Woolley, WA 98284

McMullen & Ochs, PLLC - (360) 855-1045
P.O. Box 152, Sedro-Woolley, WA 98284

Stiles & Stiles, Inc. PS - (360) 855-0131
925 Metcalf Street, Sedro-Woolley, WA 98284

Banks/Mortgage Companies:

Bank of America - (360) 855-1611
222 Ferry Street, Sedro-Woolley, WA 98284

Wells Fargo Bank - (360) 855-0241
900 Metcalf Street, Sedro-Woolley, WA 98284

Peoples Bank - (360) 854-9500
530-B Crossroads Square, Sedro-Woolley, WA 98284

Skagit State Bank - (360) 855-2141
300 Ferry Street, Sedro-Woolley, WA 98284

US Bank - (360) 844-1441
218 Woodworth St., Sedro-Woolley, WA 98284

Wells Fargo Home Mortgage | Emily A. Stewart (Email) - (360) 855-0641
900 Metcalf St., Sedro-Woolley, WA 98284

Whidbey Island Bank - (360) 855-0875
339 Ferry Street, Sedro-Woolley, WA 98284

Banquet Facilities/Catering/Event Planning:

Eagles F.O.E. 2069 - (360) 855-0530
1000 Metcalf Street, Sedro-Woolley, WA 98284

Copy Machine Sales:

Allelujah Business Systems (ABS) allcopiersystems1@verizon.net (Email) - (360) 855-1157
133 State St #B Sedro-Woolley, Wa 98284

Engineers/Surveyors:

Skagit Surveyors & Engineers - (360) 855-2121
806 Metcalf Street, Sedro-Woolley, WA 98284

Financial:

Edward Jones Investments | Troy Kunz (Email) - (360) 855-0239
913 Metcalf St, Sedro-Woolley, WA 98284

Funeral Director:

Lemley Chapel - (360) 855-1288
1008 Third Street, Sedro-Woolley, WA 98284

Insurance:

Allstate Insurance - (360) 855-0555
133 State Street, Sedro-Woolley, WA 98284

Farmers Insurance - (360) 855-0661
912 3rd Street, Sedro-Woolley, WA 98248

State Farm Insurance - (360) 855-1831
820 Township Street, Sedro-Woolley, WA 98284

Media/Advertising Venues:

Courier-Times & Printing - (360) 855-1641
807 Metcalf Street, Sedro-Woolley, WA 98284

Real Estate Development and Home Building

Landmark Building & Development (Email) - (360) 856-6400
638 Sunset Park Dr Ste 215 Sedro-Woolley, Wa 98284

Real Estate/Commercial Space:

A.R.E. Realty - (800) 729-7606
330-B Hwy. 20, Sedro-Woolley, WA 98284 - (360) 856-2121

Hendrickson Realty (Email) - (360) 855-1421
135 State St., Sedro-Woolley, Wa 98284

Vicki Boyd, Remax Valley Homes | Vicki Boyd (Email) - (360) 708-7884
22904 Apple Ln., Sedro-Woolley, WA 98284

Sales and Networking:

North Cascade Networks, LLC (Email) - (360) 856-1742 P.O. Box 639 Sedro-Woolley, Wa 98284

Service & Industrial Contractors:

All American Electric, Inc. - (360) 854-9094
639 Sunset Park Dr., Ste. 200, Sedro-Woolley, WA 98284

Associated Petroleum Products, Inc. - (360) 855-1741
700 Borseth Street, Sedro-Woolley, WA 98284

Small Planet Foods - (360) 855-0100
719 Metcalf Street, Sedro-Woolley, WA 98284

Triple R Gunsmithing LTD (Email) - (360) 854-2944
24503 Ranch Rd Sedro-Woolley, Wa 98284

Embroidery by Paula (Email) - (360) 319-7000
P.O. Box 341, Sedro-Woolley, WA 98284

Get Away Charters (Email) - (360) 856-2285
6814 State Route 9, Sedro-Woolley, WA 98284

Janicki industries, Inc. (Email) - 350-856-2068
103 Township St., Sedro-Woolley, Wa 98284

Rita Street Appliance Recycling (Email) - (360) 855-2030
211 W. Woodworth St., Sedro-Woolley, WA 98284

Right Way Plumbing, Heating, A/C Inc. (Email) -(360) 855-2665
647-A Sunset Park Dr Sedro-Woolley, Wa 98284

Ronk Brothers Heating (Email) - (360) 855-1025
210 Northern Avenue, Sedro-Woolley, WA 98284

Sedro-Woolley Lock & Key (Email) - (360) 855-2348
119 Talcott St., Sedro-Woolley, WA 98284

Skagit Readymix - (360) 856-0422
207 Jones Rd., Sedro-Woolley, WA 98284

Snelson Companies - (360) 856-6511
601 W. State Street, Sedro-Woolley, WA 98284

Wood's Electric - (360) 856-0401
22614 Grip Road, Sedro-Woolley, WA 98284

Tax Services

H & R Block (Email) - (360) 855-1172
632 Sunset Park Dr Sedro-Woolley, Wa 98284

Healthcare

Hospitals:

United General Hospital (Email) - (360) 856-7112
2000 Hospital Drive, Sedro-Woolley, WA 98284

Councilling:

Rainbow Production - (360) 856-4073
24323 McKendree Ln, Sedro-Woolley, Wa 98284

Vision/Optomety:

Sedro-Woolley Vision Center - (360) 855-1251
823 Murdock Street, Sedro-Woolley, WA 98284

Dental/Orthodontia:

Brandon L. Atkinson, DMD, PS - (360) 856-4540
727 Trail Road, Sedro-Woolley, WA 98284

Cascade Dental - (360) 856-6011
2261 Hospital Drive, Ste. 101, Sedro-Woolley, WA 98284

Jennifer Bielas, DDS, MS - (360) 854-0606
2261 Hospital Dr., Ste. 103, Sedro-Woolley, WA 98284

Sedro-Woolley Family Dental Center - (360) 855-0351
830 Metcalf St., Sedro-Woolley, WA 98284

Disabled Services & Hospice Care:

Firview Apartments (Independent living units) - (360) 855-0763
718 Township Street #A, Sedro-Woolley, WA 98284

Elder/Nursing Care:

Country Meadow Village - (360) 856-0404
1501 Collins Road, Sedro-Woolley, WA 98284

Firview Apartments (Independent living units) - (360) 855-0763
718 Township Street #A, Sedro-Woolley, WA 98284

Life Care Center of Skagit Valley - (360) 856-6867
2019 Hwy. 20, Sedro-Woolley, WA 98284

Birchview | admin@birchviewmemorycare.com (Email) - (360) 856-1911
925 Dunlop Ave., Sedro-Woolley, WA 98284

Skagit Adult Day Care (Email) - (360) 755-1235 116 N Skagit St Burlington, Wa 98233

Chemical Dependency:

Pioneer Center North - (360) 856-3186
P.O. Box 231, Sedro-Woolley, WA 98284

Fitness:

Curves For Women - (360) 855-2292
903-A Metcalf Street, Sedro-Woolley, WA 98284

Riverside Health Club Eastside - (360) 854-9285
632 Sunset Park Drive, Sedro-Woolley, WA 98284

Veterinarians:

North Cascade Veterinary Hospital - (360) 856-1809
200 Murdock Street, Sedro-Woolley, WA 98284

Miscellaneous:

North Cascades Health Council (Email) - (360) 856-0846
P.O. Box 806 Sedro-Woolley, WA 98284

North Cascade Cardiology (Email) - 888-739-2700
UGH 2031 C Hospital Dr Sedro-Woolley, Wa 98284

Community & Professional Organizations

Associations

Boys & Girls Club - (360) 856-1830
P.O. Box 417, Sedro-Woolley, WA 98284

Fraternal Order of Eagles #2069 - (360) 855-0530
1000 Metcalf Street, Sedro-Woolley, WA 98284

Lion's Club - (360) 856-2410
9719 Soren Rd, Sedro-Woolley, Wa 98284

Sedro-Woolley Chamber of Commerce - (888) 225-8365 or (360) 855-1841
714-B Metcalf Street, Sedro-Woolley, WA 98284

Sedro-Woolley Kiwanis - (360) 855-1251
P.O. Box 348, Sedro-Woolley, WA 98284

Sedro-Woolley Loggerodeo, Inc. - (360) 855-1129
P.O. Box 712, Sedro-Woolley, WA 98284

Sedro-Woolley Senior Center - (360) 855-1531
715 Pacific Street, Sedro-Woolley, WA 98284

Soroptimist International of Sedro-Woolley - (360) 854-9133
P.O. Box 249, Sedro-Woolley, WA 98284

Wildcat Steelhead Club - (360) 855-2291
P.O. Box 435, Sedro-Woolley, WA 98284

Churches:

St James Episcopal Church - (360) 855-0040
300 State St Sedro-Woolley, Wa 98284

Sedro-Woolley Community Church - (360) 855-1673
314 W. Woodworth, Sedro-Woolley, WA 98284

Community Members

Jane Rocha - 1121 McGarigle Rd
Sedro-Woolley, Wa 98284

Schools:

Sedro-Woolley Schools Foundation
P.O. Box 401, Sedro-Woolley, Wa 98284

Sedro-Woolley Education Association
6900 Sr 9, Sedro-Woolley, Wa 98284

Sedro-Woolley High School Alumni Assoc
P.O. Box 509, Sedro-Woolley, Wa 98284

Sedro-Woolley School District #101 - (360) 855-3500
801 Trail Road, Sedro-Woolley, WA 98284

Cascade Job Corps Center - (360) 854-3400
P.O. Box 819/7782 Northern State Road,
Sedro-Woolley, WA 98284

Utilities:

City of Sedro-Woolley - (360) 855-1661
720 Murdock Street, Sedro-Woolley, WA 98284

Sedro-Woolley Municipal:

720 Murdock Street, Sedro-Woolley, WA 98284

Administration City Hall - (360) 855-1661 - Business Licenses, Cemetery, City Clerk, Community Center, Parks

Mayor Sharon Dillon - (360) 855-1661

Building Permits, Engineering, Planning - (360) 855-0771

Municipal Court - (360) 855-0366

Sanitation - (360) 855-0929

Fire Department - (360) 855-2252

220 Munro Street, Sedro-Woolley, WA 98284

Library - (360) 855-1166

802 Ball Avenue, Sedro-Woolley, WA 98284

Police - (360) 855-0111

220 Munro Street, Sedro-Woolley, WA 98284

DECLARATION OF WILLIAM J. WOLFENBARGER

William J. Wolfenbarger states under penalty of perjury as follows:

1. I am President of Jodesha Broadcasting, Inc.
2. The facts set out in the Tuck Analysis portion of the foregoing Reply Comments, except for those substantiated by the declaration from the Mayor of Sedro-Woolley are based on my personal knowledge of the Sedro-Woolley area and research that I personally conducted and are true and correct to the best of my knowledge and belief.


William J. Wolfenbarger

Dated: April 28, 2006

CERTIFICATE OF SERVICE

I, David Tillotson, do hereby certify that a copy of the foregoing **REPLY COMMENTS** have been sent via first class United States mail, postage pre-paid, this 1st day of May, 2006, to:

Dana J. Puopolo
2134 Oak Street, Unit C
Santa Monica, California 90405

Gary S. Smithwick, Esq.
Smithwick & Belendiuk, P.C.
5028 Wisconsin Avenue, NW
Suite 301
Washington, DC 20016

Sandra Woodruff
2708 Hampton Ct. S.E.
Olympia, WA 98501

David Tillotson