

ORIGINAL

BEFORE THE
Federal Communications Commission
WASHINGTON, D. C. 20554

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AUG 31 2006

Federal Communications Commission
Office of Secretary

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MB Docket No. 05-282
Table of Allotments,)	RM-11229
FM Broadcast Stations.)	RM-11333
(Rockmart, Aragon and Ringgold, GA;)	RM-11337
Lynchburg, Chattanooga, Spring)	
City, Decatur, Harrison and)	
Wartrace, TN))	

TO: The Secretary
 ATTN: Assistant Chief, Audio Division
 Media Bureau

COMMENTS SHOWING CAUSE
WHY THE LICENSE OF WLJA(FM) MUST NOT BE MODIFIED

Dennis J. Kelly

LAW OFFICE OF DENNIS J. KELLY
 Post Office Box 41177
 Washington, DC 20018-0577
 Telephone: 202-293-2300

Counsel for:

August 31, 2006

TRI-STATE COMMUNICATIONS, INC.

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SUMMARY

FM Station WLJA, Ellijay, Georgia, objects to being forcibly evicted from FM Channel 228A and consigned to Channel 266A, because station WMPZ(FM)'s attempt to flee Ringgold, Georgia for the greener pastures of unincorporated Harrison, Tennessee, a suburb of Chattanooga, violates the strict policy of the Commission proscribing "substandard FM allocations", and because it would be a *de facto* "rural to urban" reallocation of an FM Channel in violation of the policy stated in **Faye and Richard Tuck**, 3 FCC Rcd 5374 (1988).

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COMMENTS SHOWING CAUSE
WHY THE LICENSE OF WLJA(FM) MUST NOT BE MODIFIED

Tri-State Communications, Inc., licensee of FM Broadcast Station WLJA-FM, Ellijay, Georgia (WLJA), by its attorney, and pursuant to the "Order to Show Cause" in the above-entitled matter, DA 06-1533, released July 28, 2006, hereby respectfully submits Comments showing cause why the license of WLJA must not be modified to specify FM Channel 266A (101.1 MHz) in lieu of the station's present assignment on FM Channel 228A (93.5 MHz). In so doing, the following is shown:

1. There are two basic reasons why the "Counterproposal" filed by J. L. Brewer Broadcasting of Cleveland, LLC and J. L. Brewer Broadcasting, LLC (Brewer)

on December 5, 2005 must be dismissed or denied. First, Brewer's request to allocate Channel 228A at Harrison, Tennessee violates the strict policy of the Commission proscribing "substandard FM allocations" at the allotment stage, because the Brewer proposal fails to comply with Section 73.315 of the Rules by failing to provide line-of-sight city-grade service to Harrison. Second, on the facts present in this case, Brewer is attempting a "rural to urban" reallocation of an FM Channel in violation of the policy stated in *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988), since Brewer's request to reallocate a channel from Ringgold, Georgia to Harrison, Tennessee is actually a request to reallocate the channel to the large city of Chattanooga, Tennessee.

Substandard Allocation

2. Brewer's very own Counterproposal in the above-entitled matter, in its very first paragraph, sets forth the standard by which it must be judged:

As an initial matter, the proposal filed by Women's World Broadcasting, Inc. ("WWB") is defective and must be dismissed. Specifically, WWB's proposal for Channel 296C1 at Aragon, Georgia violates Section 73.315 of the Commission's Rules because it does not provide the required line-of-sight to the community due to intervening terrain. As demonstrated in the Technical Report, this terrain obstacle prohibits the provision of a 70 dBu signal to Aragon. ***

3. As it turned out, Brewer's counterproposal as filed on December 5, 2006 failed to make a probative showing as to its proposed use of Channel 228A at Harrison overcoming intervening terrain barriers and complying with FCC rules and policies relative to line-of-sight coverage of Harrison, Tennessee.

4. On December 20, 2005, WLJA filed Reply Comments, in which it submitted a technical statement of Clifton G. Moor of Bromo Communications, in which it was demonstrated that there were terrain barriers that prevented the relocated WMPZ from providing line-of-sight city-grade coverage of Harrison (see Exhibit A).

5. On August 4, 2006, Brewer filed "Reply Comments" to which was attached a confusing "Technical Report" of Charles M. Anderson (see Exhibit B). This report is filled with conclusionary statements, such as "the terrain obstacles depicted are minor", and refers to Harrison as a "city". Since Harrison is not a city, but rather an unincorporated place classified by the federal Bureau of the Census as a "census designated place", it is unclear what the boundaries on page three of the "Technical Report" refer to. Furthermore, Mr. Anderson presumes uniform population distribution in Harrison when, as it turns out, a

substantial portion of the "Harrison CDP" is virtually uninhabited.

6. WLJA has consulted with the Bureau of the Census, who reports that of the total CDP population of 7,630, 7,602 persons reside within the "Chattanooga Urbanized Area" in an area of 7.158 square miles. As the total area of the Harrison CDP is 9.139 square miles (based on Mr. Anderson's claim that the "city of Harrison" contains 23.66 square kilometers), Mr. Anderson's claims as to the percentage of people within the Harrison CDP that can receive line-of-sight coverage is hopelessly flawed. Therefore, his "Technical Statement" is useless in determining whether Brewer's proposal can provide line-of-sight city-grade coverage of the Harrison CDP.

7. In FM allocation rulemaking proceedings, the Commission has consistently enforced a policy that the rulemaking proposal must meet each and every rule, regulation and policy of the Commission relative to short-spacing and city-grade coverage, or the proposal will be denied. *FM Table of Allotments, Montauk, NY*, 19 FCC Rcd 2089, ¶5, n. 7 (2004); *FM Table of Allotments, Eugene, OR*, 10 FCC Rcd 9793, ¶6 (1995); *FM Table of Allotments, Chester & Wedgefield, SC*, 4 FCC Rcd 4503 (1989), recons. den. 5 FCC

Rcd 5572 (1990); *FM Table of Allotments, Creswell, OR*, 3 FCC Rcd 4608 (1988), recons. den. 4 FCC Rcd 7040 (1989).

8. Furthermore, as was stated most recently in *FM Table of Allotments, Caro and Cass City, Michigan*, 19 FCC Rcd 4352, ¶3, n. 5 (2004):

Counterproposals are required to be filed by the comment deadline set in the Notice of Proposed Rulemaking and they must be technically correct and substantially complete when filed. [FN5] The comment date in this proceeding was April 17, 2001. Any changes to the counterproposal would have been timely only if they had been filed prior to that date. Under our rules, these proffered corrections have not been considered because they are not timely.

* * * * *

[FN5] See *Auburn et al., Alabama*, 18 FCC Rcd 10333 (2003); *Lincoln, Osage Beach, Steelville and Warsaw, Missouri*, 17 FCC Rcd 6119 (2003).

9. Brewer had an obligation to put forth a proper terrain showing in its "Counterproposal" filed on December 5, 2005—the deadline for such filings in this proceeding. It failed to do so, waiting until August 4, 2006 to file "Reply Comments". Therefore, since its "Counterproposal" was not "technically correct and substantially complete" on December 5, 2005, it must be rejected.

Rural to Urban Move-in

10. Brewer's August 4, 2006 "Reply Comments" contends that, since Ringgold, Georgia and Harrison, Tennessee are

both located in the Chattanooga Urbanized Area, we don't have a "rural to urban" move-in situation, and, as a result, the **Faye and Richard Tuck** showing is not implicated.

11. Brewer fails to inform the Commission that Ringgold is only partially within the Chattanooga Urbanized Area, in that 2,031 of the total of 2,422 persons who reside within the municipal boundaries of Ringgold have been determined by the Bureau of the Census to reside in the "Chattanooga Urbanized Area". Thus, 16.15% of the population of Ringgold resides outside the Chattanooga Urbanized Area.

12. Furthermore, Ringgold is an incorporated city and the county seat of Catoosa County, Georgia. The existing transmitter site of WMPZ(FM), Ringgold, Georgia is located roughly in the center of Catoosa County, outside the Chattanooga Urbanized Area. Moreover, as the map prepared by Bromo Communications and appended hereto as Exhibit C, one can readily see that Brewer's "counterproposal" is a bold bid to withdraw a station focused on Catoosa County, Georgia and relocate it virtually to the center of the Chattanooga metropolitan area—Ringgold would no longer have city-grade service from WMPZ.

13. Moreover, the Commission needs to take into consideration a major terrain barrier that separates central

Chattanooga from communities to its southeast, including Ringgold-Missionary Ridge. Bromo Communications has prepared a showing, attached hereto as Exhibit D, which demonstrates that, at present, Missionary Ridge prevents WMPZ's signal from satisfactorily reaching Chattanooga.

14. Therefore, Brewer's claims to the contrary, its counterproposal constitutes a classic "rural to urban" move-in. Therefore, the Commission must evaluate the eight **Tuck** criteria before depriving Ringgold of one of its two FM stations in favor of Chattanooga *de facto* receiving its fourth FM allocation and tenth commercial broadcast allocation (there are six AM stations licensed to Chattanooga)¹.

15. The eight **Tuck** criteria are: (1) workplace of local residents; (2) local media serving Harrison; (3) local perception; (4) local government; (5) post office and telephone book; (6) commercial establishments, health facilities and transportation systems; (7) local advertising market; and (8) reliance on metropolitan area for services.

16. On at least five of these eight criteria, Brewer has either failed to make an adequate showing, or the facts are simply against Harrison.

¹The FM stations are: WDEF-FM; WDOD-FM; and WSKZ. The AM stations are: WDEF; WDOD; WGOW; WJOC; WLMR; and WNOO. Additionally, three non-commercial FM stations are licensed to Chattanooga: WDYN; WMBW; and WUTC.

17. As to the first criterion, workplace of local residents, that there may be "approximately 100 businesses and commercial establishments" does not come close to proving that residents of Harrison work in Harrison. Brewer fails to show exactly how many actual jobs exist in Harrison. Brewer failed to make a probative showing on criterion.

18. As to the second criterion, Brewer cleverly avoids mentioning that Harrison has no local media. The four radio stations listed (WJTT, WGOW-FM, WKXJ and WTRZ-FM) are all licensed to suburbs of Chattanooga². Harrison receives most of its over-the-air television service and daily newspaper from Chattanooga. On information and belief, the local cable television system is the system that serves Chattanooga, operated by Comcast.

19. As to the third criterion, it is probably not surprising that Brewer could find only three "civic organizations" at Harrison—according to the on-line encyclopedia Wikipedia, Harrison existed as a town prior to the establishment of the Tennessee Valley Authority, but was destroyed when Chickamauga Lake was created, which flooded the former town. Harrison today is an unincorporated place located along the eastern shore of Chickamauga Lake.

20. As to the fourth criterion, Harrison is unincorporated and has no local governmental institutions.

21. As to the fifth criterion, Harrison has a post office and its own zip code. On information and belief, Harrison's listings are contained in the Chattanooga telephone directory. While it may have a post office and a volunteer fire department, it has no municipal government. Hamilton County is administered from Chattanooga; the local schools are operated by the Hamilton County School Board; and the local lake is administered by the federal Tennessee Valley Authority.

22. As to the sixth criterion, while Harrison has some commercial establishments, interestingly enough, those establishments which choose to belong to a chamber of commerce belong to the Greater Chattanooga Chamber of Commerce.

23. As to the seventh criterion, the claim that Harrison is a separate advertising market from Chattanooga is laughable. A news article relative to a lawsuit brought against the "Hamilton County Herald", a weekly newspaper, indicated that the mail circulation of that paper is a

²WJTT is licensed to Red Bank, TN; WGOW-FM is licensed to Soddy-Daisy, TN; WKXJ is licensed to Signal Mountain, TN; and WTRZ-FM is licensed to McMinnville, TN.

whopping 362³. Furthermore, that paper has a Chattanooga address. The "Signal Mountain Mirror" has an address in Lookout Mountain, Georgia.

24. As to the eighth criterion, Harrison relies on the greater metropolitan area for its services. The Volunteer Electric Cooperative referred to in the Brewer pleading is, according to its website, an electric cooperative headquartered in Decatur, Tennessee with 100,000 subscribers in 17 counties in middle and east Tennessee. The Savannah Valley Utility District is a board appointed by the Hamilton County Board of Commissioners.

25. To summarize, Harrison has no local media, is not a separate advertising market from Chattanooga, is unincorporated and has no local governmental institutions of its own, and relies on the surrounding Chattanooga metropolitan area for services. Furthermore, Brewer has failed to make a probative showing as to the workplace of Harrison residents. Since Brewer has failed to prove that Harrison meets a majority of the **Tuck** criteria, its proposal to reallocate WMPZ(FM) to Harrison, Tennessee must be rejected.

³http://www.chattanooga.com/articles/article_56225.asp

Conclusion

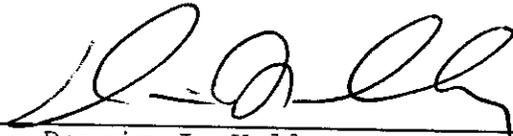
12. Thus, WLJA objects to being forced to change channels in order to accommodate an allocation proposal for a substandard channel at Harrison, Tennessee which is a mere ruse to reallocate this station to Chattanooga. WLJA has operated on 93.5 MHz for over 20 years, and has built up a great amount of goodwill and listener awareness of its operations on that channel, which will be lost should the Brewer counterproposal be granted. The key concept to be kept in mind is that the listening public in north Georgia will be inconvenienced, in order to accommodate a proposal which violates the FCC's rules and policies and would serve only to permit WMPZ(FM) to have better coverage of Chattanooga. Both the listeners of WLJA(FM) and the citizens of Ringgold, Georgia will be aggrieved should Brewer's counterproposal be granted.

WHEREFORE, Tri-State Communications, Inc. **OBJECTS** to being forced to move from Channel 228A to Channel 266A, and it is urged that the "Counterproposal" filed on December 5, 2005 by J. L. Brewer Broadcasting of Cleveland, LLC and J. L. Brewer Broadcasting, LLC **BE DISMISSED OR DENIED.**

Respectfully submitted,

TRI-STATE COMMUNICATIONS, INC.

By



Dennis J. Kelly
Its Attorney

LAW OFFICE OF DENNIS J. KELLY
Post Office Box 41177
Washington, DC 20018
Telephone: 202-293-2300

August 31, 2006

EXHIBIT A

Technical Comments
Filed by Tri-States Communications, Inc.
Regarding Counterproposal to MB Docket No. 05-282
December 2005

These Technical Comments are filed on behalf of Tri-States Communications, Inc, ("Tri-States") licensee of WLJA-FM, Ellijay, Georgia. J. L. Brewer Broadcasting of Cleveland, LLC, ("Brewer") in a recent counterproposal to MB Docket No. 05-585, RM – 11229, has proposed a change of channel for Tri-States from the currently licensed Channel 228A to Channel 266A. These Tri-States comments oppose the Brewer counterproposal.

Tri-States has examined the Channel 228A proposal by Brewer at Harrison, Tennessee. The proposed allocation reference is North Latitude 35 07 06 and West Longitude 85 14 29. The East Chattanooga, Tennessee 7.5 minute topographic map was consulted to determine the allocation reference has a site elevation of 670 feet (204.2 meters). The 03 second terrain database was consulted to determine that a Class A maximum station at this site would have a center of radiation above mean sea level of 378.59 meters. Simple subtraction indicates that the hypothetical supporting structure would be 174.39 meters (572 feet) above ground level.

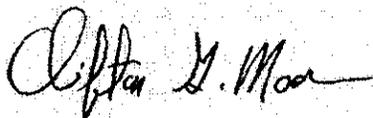
A series of terrain radials were drawn from the proposed allocation reference to areas of the Harrison CDP. This CDP is far larger than a small community, it is very conservatively 4.5 KM north to south as well as another 4.5 KM east to west. It takes a rather large area to house the 7,630 residents of Harrison, Tennessee CDP. Radials in the 84, 85, 86 and 87 degree azimuths are drawn. Each radial is drawn from the class maximum height of 378.59 meters AMSL. Each of these four radials has pockets of severe shadowing through the Harrison, Tennessee CDP which is indicated by the shaded areas. In each case, the extreme right side of the radial coincides with where that radial exits the CDP.

A check was made to see how Brewer addressed this severe shadowing in the counterproposal. Brewer did accurately draw a single radial to one area of the Harrison, Tennessee, CDP, but ignored all other areas and radials. Clearly, the four consecutive radials Tri-States has brought to light represent a major swath through the heart of the Harrison, Tennessee CDP that does not receive the required line-of-sight service due to intervening terrain. This lack of line-of-sight to the Harrison, Tennessee CDP causes the Brewer counterproposal to be defective.

It is apparent that Brewer values a true non-obstructed line-of-sight path to a community of license. Brewer objected to MB Docket No. 05-282, RM – 11229 filed by Women's World Broadcasting, Inc. (first service to Aragon, Georgia) on the basis of lack of line-of-sight. Brewer then filed a counterproposal that supposedly was without defect. However, these Tri-State comments are intended to cite a defect in the Brewer proposal, violation of Section 73.315 (b), that will cause it to be dismissed as defective.

Because of the defective Harrison, Tennessee counterproposal filed by Brewer, the counterproposal should be returned as defective and Tri-States' WLJA-FM, Ellijay, Georgia should be allowed to continue operation on its longtime assigned channel, 228A, without interruption or the confusion associated with any change of channel.

All information contained herein is thought to be accurate to the knowledge of the undersigned.

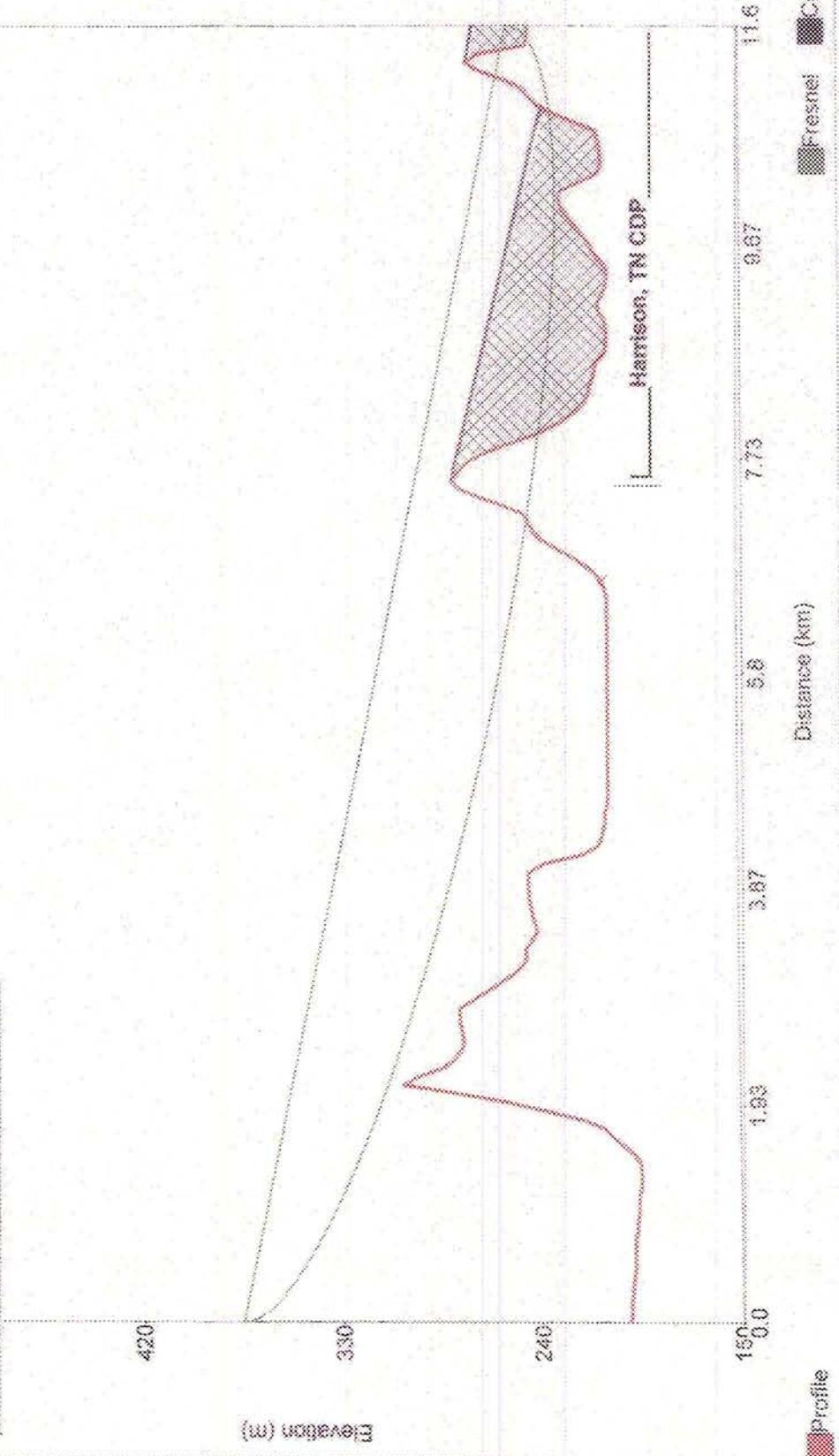


Clifton G. Moor, Bromo Communications, Inc.
Technical Consultant to Tri-States Communications, Inc.

December 19, 2005

Earth's Curvature = 1.33

84 Degree Radial through
Harrison, TN CDP
COR 378.59 M AMSL



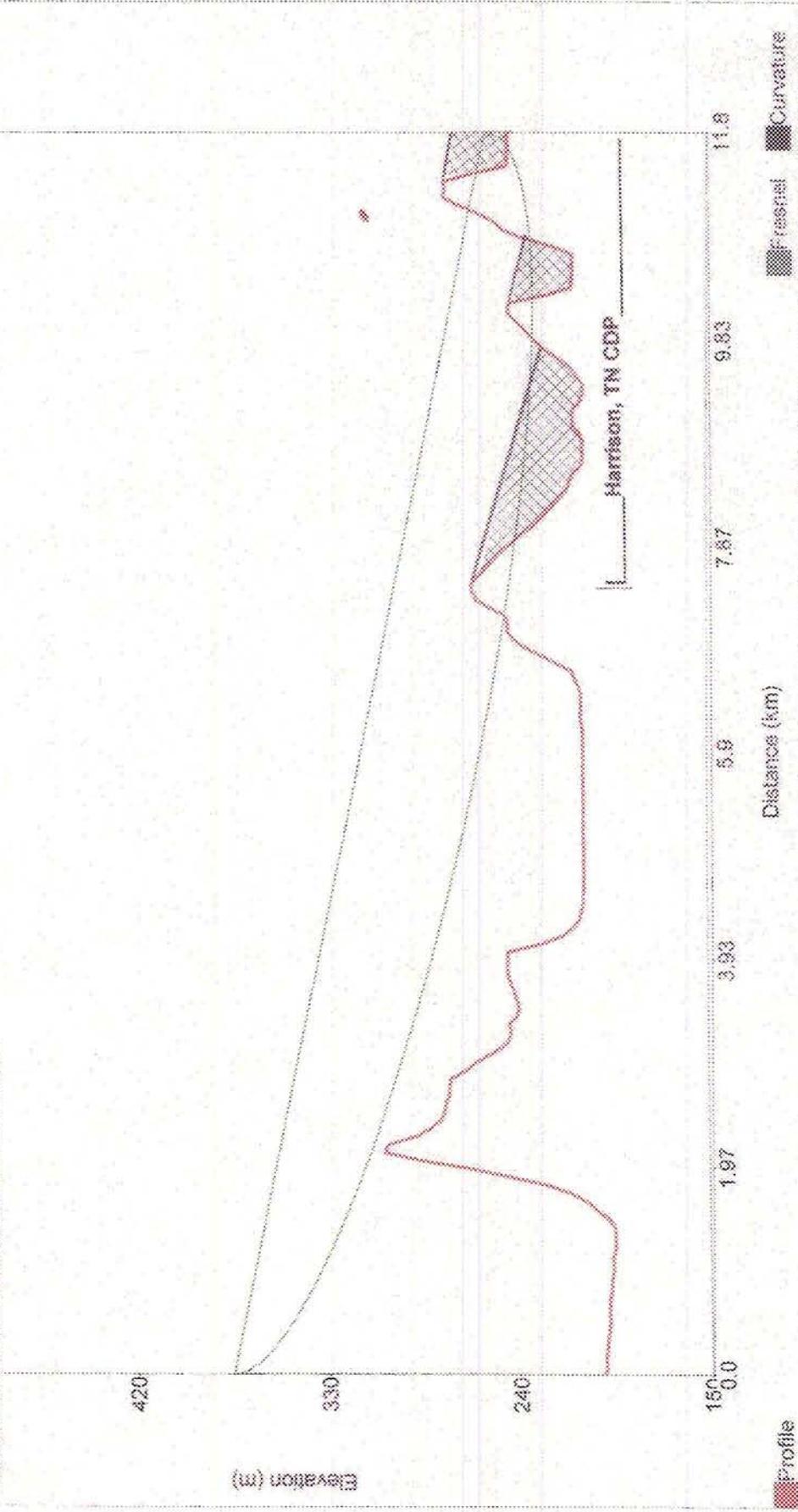
Starting Latitude: 35-07-06 N End Latitude: 35-07-46.11 N Distance: 11.8 km
 Starting Longitude: 085-14-29 W End Longitude: 085-06-53.35 W Bearing: 84 deg

Transmitter Height (AG) = 174.4 m Transmitter Elevation = 200.5 m Frequency = 93.5 MHz
 Receiver Height (AG) = 10.0 m Receiver Elevation = 244.0 m Fresnel Zone: 0.6



Earth's Curvature = 1.33

85 Degree Radial through
Harrison, TN CDP
COR 378.69 M AMSL



Distance: 11.8 km
Bearing: 85 deg

End Latitude: 35-07-39.13 N
End Longitude: 085-06-44.72 W

Starting Latitude: 35-07-06 N
Starting Longitude: 085-14-29 W

Frequency = 93.5 MHz
Fresnel Zone: 0.6

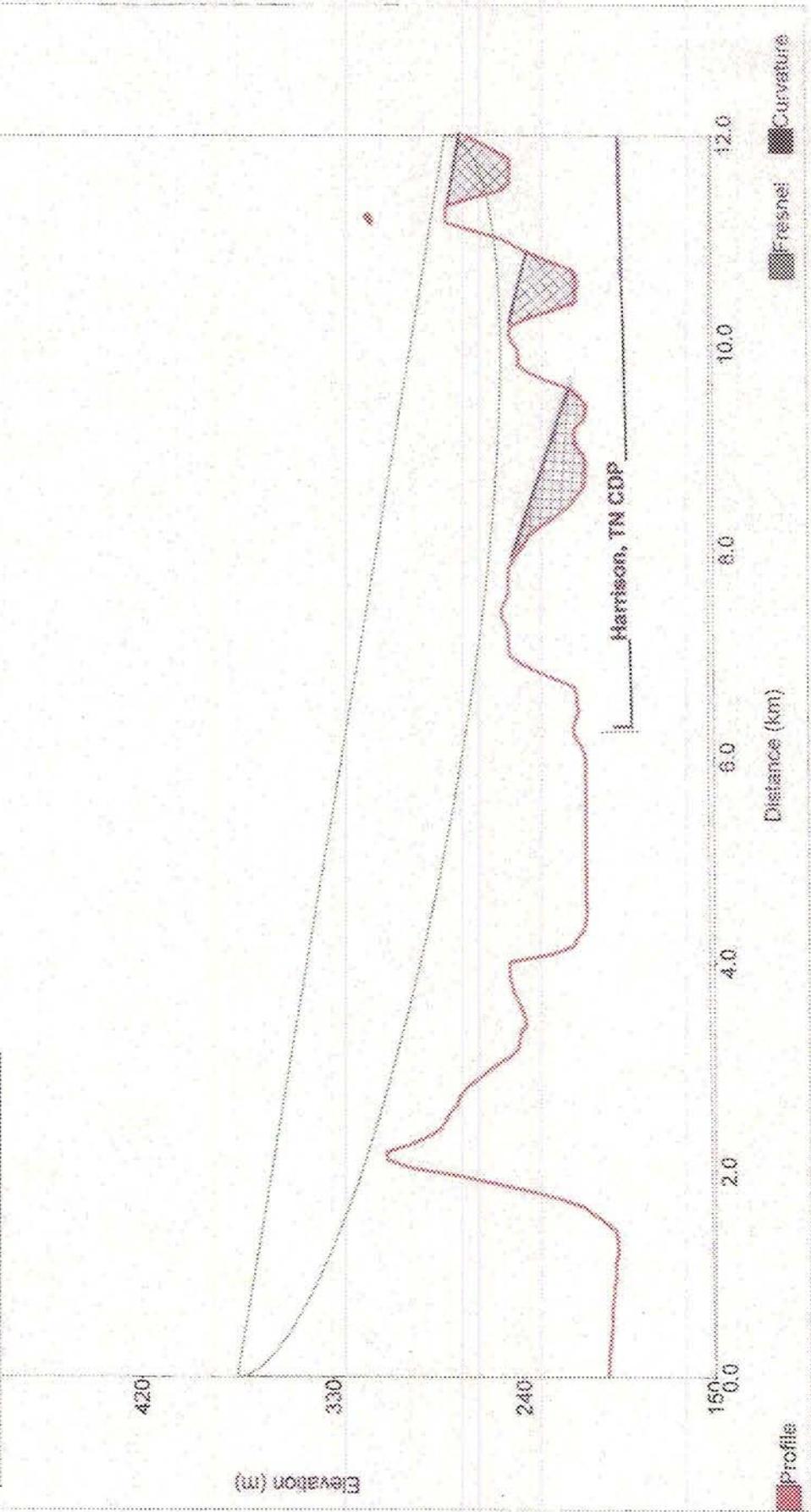
Transmitter Elevation = 200.6 m
Receiver Elevation = 244.7 m

Transmitter Height (AG) = 174.4 m
Receiver Height (AG) = 10.0 m



Earth's Curvature = 1.33

86 Degree Radial through
Harrison, TN CDP
COR 378.59 M AMSL



Distance: 12.0 km
Bearing: 86 deg

End Latitude: 35-07-32.91 N
End Longitude: 085-06-35.21 W

Starting Latitude: 35-07-06 N
Starting Longitude: 085-14-29 W

Frequency = 93.5 MHz
Fresnel Zone: 0.6

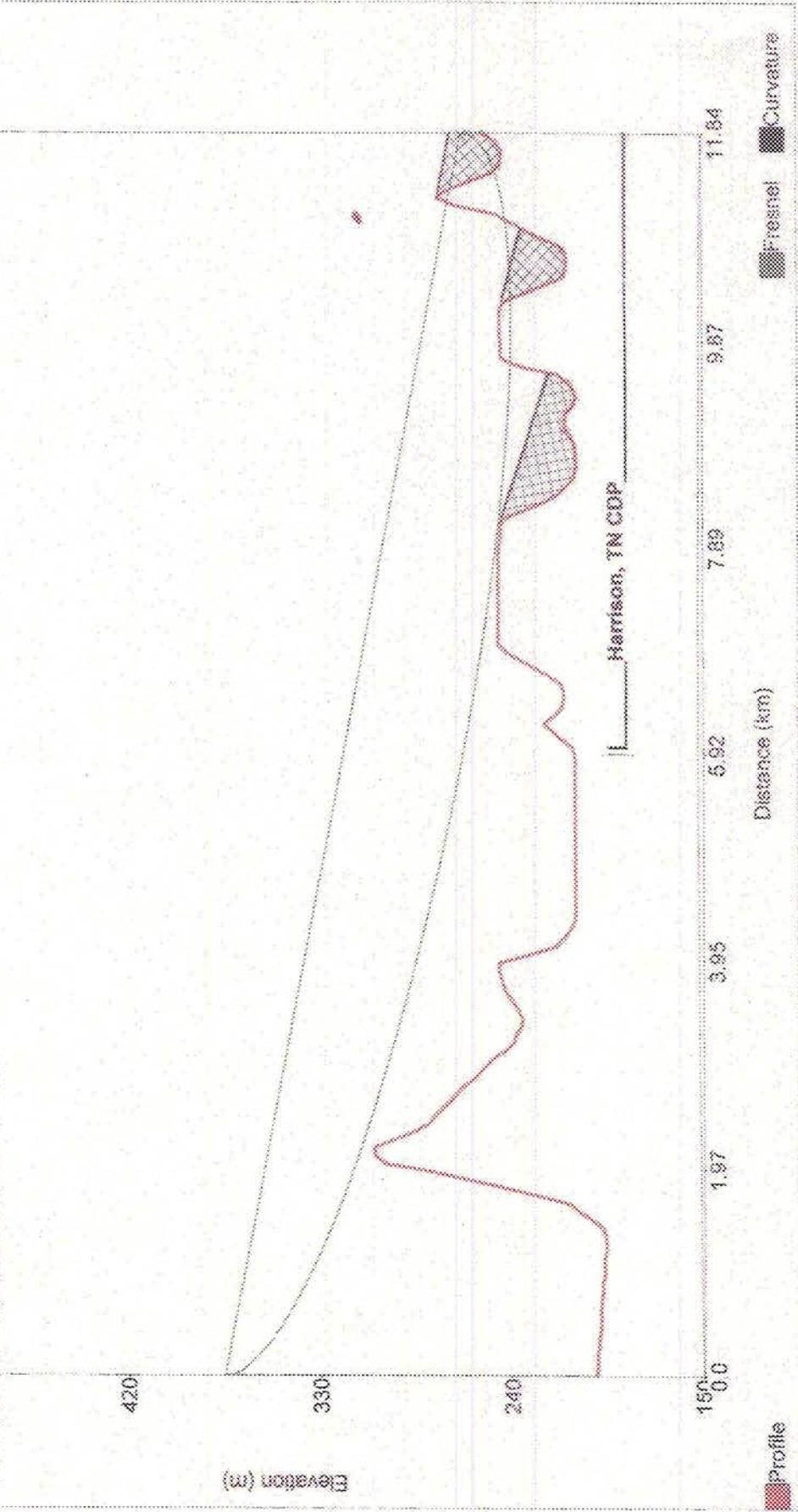
Transmitter Elevation = 200.6 m
Receiver Elevation = 254.0 m

Transmitter Height (AG) = 174.4 m
Receiver Height (AG) = 10.0 m



Earth's Curvature = 1.33

87 Degree Radial through
Harrison, TN CDP
COR 378.59 M AMSL



Distance: 11.84 km
Bearing: 87 deg

End Latitude: 35-07-25.86 N
End Longitude: 085-06-42.03 W

Starting Latitude: 35-07-06 N
Starting Longitude: 085-14-29 W

Frequency = 93.5 MHz
Fresnel Zone: 0.6

Transmitter Elevation = 200.0 m
Receiver Elevation = 253.0 m

Transmitter Height (AG) = 174.4 m
Receiver Height (AG) = 10.0 m

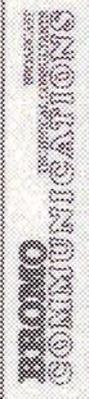


EXHIBIT B

**TECHNICAL REPORT IN SUPPORT OF A RESPONSE TO
TRI-SATE COMMUNICATIONS, INC. COMMENTS REGARDING
THE BREWER COUNTERPROPOSAL IN MB DOCKET NO. 05-282**

August 2, 2006

Tri-State Communications, Inc. (Tri-States) filed comments regarding the J.L. Brewer Broadcasting, LLC (Brewer) proposal to reallocate station WMPZ to Harrison, TN on FM Channel 228A alleging that "...terrain obstacles will prevent this proposed station from providing line-of-sight 70 dBu coverage to Harrison".

Tri-States did not submit any detailed showings or calculations as the Commission has required in previous cases (e.g. The Dalles, OR et al., FCC 04-118 at paragraph 17) that the minor terrain obstacles to a small portion of Harrison would prevent the delivery of a 70 dBu (50/50) signal over the entire community. Tri-State only submitted four terrain profiles on azimuths 84 to 87 degrees characterizing them as demonstrating "severe pockets of shadowing". In fact, the terrain obstacles depicted are minor, and do not qualify as a major obstacle as contemplated by Section 73.315.

Brewer's proposal will provide line of sight to 90% of the Harrison community:

Exhibit E1 demonstrates that the channel Harrison 228A proposal will achieve line of sight to 90.9% of the area within the Harrison boundaries. This exhibit was prepared with the V-Soft Probe 3 software using a 205 meter tower at the proposed reference point and .1 km cells. Furthermore, the proposed Harrison 228A reference point has line of sight to the Harrison community reference point (see E3).

Brewer's Harrison proposal will provide a 70 dBu signal over all of Harrison based on the Commission's standard method and the use of Longley-Rice:

The Commission has held in several cases that line of sight is not required over an entire community. In fact, in the Madison, IN, Report and Order (MM Docket No. 98-105) the Commission stated:

Our studies further indicate that considering the terrain obstruction between the proposed site for channel 266A and the community of Madison, the 70 dBu signal will be attenuated once it reaches Madison, but in any event it will not fall below the required level of service over the city of Madison (paragraph 5).

Furthermore, in the Vacaville and Middletown, CA First Report and Order (MM Docket No. 88-491), the Commission clearly enunciated the fact that line of sight is not required:

Where it is alleged that a site cannot be found that allows line-of-sight coverage over the community or a transmission path free of a major obstruction, as required by Section 73.315 of the Commission's Rules, the proponent must demonstrate by

Charles M. Anderson Associates

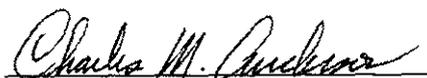
an engineering showing that the received signal strength as transmitted from the site will exceed 70 dBu and will encompass the entire community (paragraph 13).

The FCC's standard method and the Longley-Rice method predict that a signal level significantly greater than 70 dBu will be delivered to the entire Harrison community. In fact, the FCC method predicts a 78 dBu or greater signal and Longley-Rice predicts a 74.8 dBu or greater signal (see E2). Both analyses were conducted for the Channel 228A facility at the proposed reference point (N35-07-06 W 85-14-29) at a distance of 5.2 km to the closest point on the Harrison boundary and 9.4 km to the community reference point¹. The study used a 3.6 kW/ 131 meter HAAT facility (6 kW/100 meter equivalent). A 205 meter tower was used for this study as permitted for a Class A facility for the purpose of line of sight analysis in the recent Halls Crossroads and Lake City, TN case (MB Docket No. 03-120 Report and Order). The proponent commits to the construction of a 205 meter tower if required.

This analysis was conducted using V-Soft Communications' Probe 3 software, a recognized standard in the industry based on the Department of Commerce-NTIA algorithms, and the V-Soft 30 second terrain database. The Longley-Rice parameters used are standard for the geography involved, and are enumerated on the exhibit.

Conclusion:

It is concluded that the proposed Channel 228A allocation will provide a 70 dBu or greater signal to the entire community of Harrison, TN in accordance with Section 73.315 and established Commission policies and precedents.



1519 Euclid Avenue
Bowling Green, KY 42103
270-782-0246
270-793-9129 FAX
charlesmanderson@bellsouth.net
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¹ There is considerable flexibility in the selection of a site for the proposed WMPZ Channel 228A facility that will meet spacing requirements. In fact, the site may be located even closer to Harrison thereby increasing the signal level (e.g. N 35-08-06 W 85-13-41).

E1 WMPZ
Latitude: 35-07-06 N
Longitude: 085-14-29 W
ERP: 6.00 kW
Channel: 228
Frequency: 93.5 MHz
AMSL Height: 409.2 m
Elevation: 204.2 m

E1 HARRISON 228A
LINE OF SIGHT STUDY
RECEIVER HEIGHT = 9.1 M
TRANSMITTER HEIGHT AGL = 205M
CELL SIZE = .1 KM

HARRISON, TN CITY BOUNDARIES
23.66 SQ KM

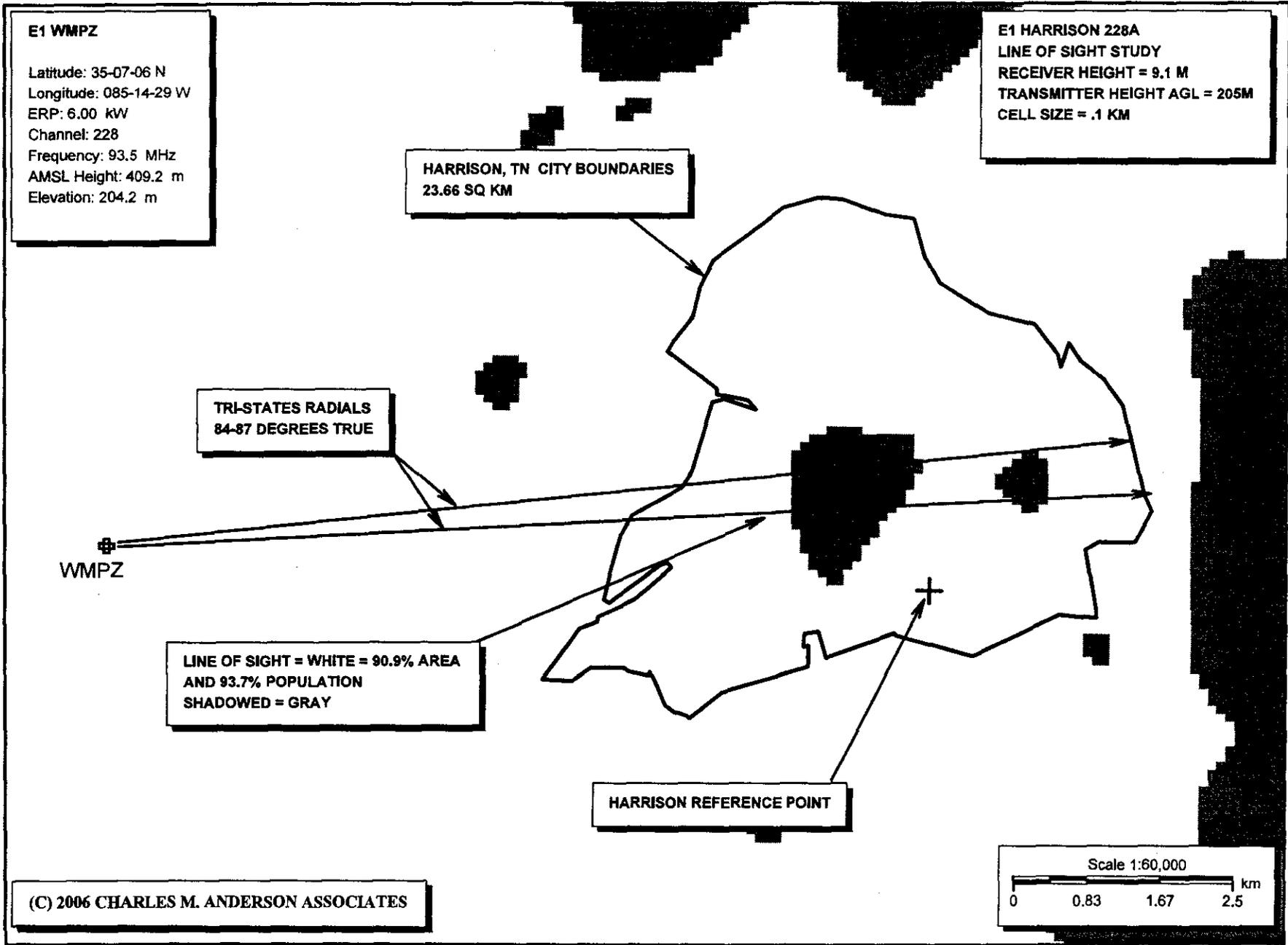
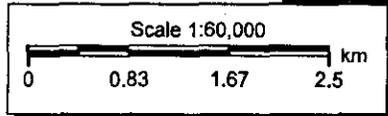
TRI-STATES RADIALS
84-87 DEGREES TRUE

WMPZ

**LINE OF SIGHT = WHITE = 90.9% AREA
AND 93.7% POPULATION
SHADOWED = GRAY**

HARRISON REFERENCE POINT

(C) 2006 CHARLES M. ANDERSON ASSOCIATES



WMPZ

Latitude: 35-07-06 N
Longitude: 085-14-29 W
ERP: 3.60 kW
Channel: 228
Frequency: 93.5 MHz
AMSL Height: 409.2 m
Elevation: 204.2 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: Longley/Rice
Climate: Cont temperate
Conductivity: 0.0050
Dielec Const: 15.0
Refractivity: 311.0
Receiver Ht AG: 9.1 m
Receiver Gain: 0 dB
Time Variability: 50.0%
Sit. Variability: 50.0%
ITM Mode: Broadcast

**E2 228A 3.6 KW/ 131 METER HAAT
USING 205 METER TOWER**

**THE STUDY USED .1 KM CELLS TO CALCULATE
THE LONGLEY-RICE CONTOUR. NOTE THAT
ALL OF HARRISON RECEIVES A 74.8 DBU OR
GREATER SIGNAL BASED ON THE MOST CONSERVATIVE
FIRST OCCURRENCE METHODOLOGY.**

**THE FCC STANDARD METHOD 70 DBU CONTOUR
ENCOMPASSES THE ENTIRE COMMUNITY AS WELL.**

**LONGLEY-RICE 74.8 DBU
FIRST OCCURRENCE**

FCC 70 DBU

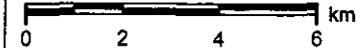
⊕ WMPZ

HARRISON, TN CITY BOUNDARIES

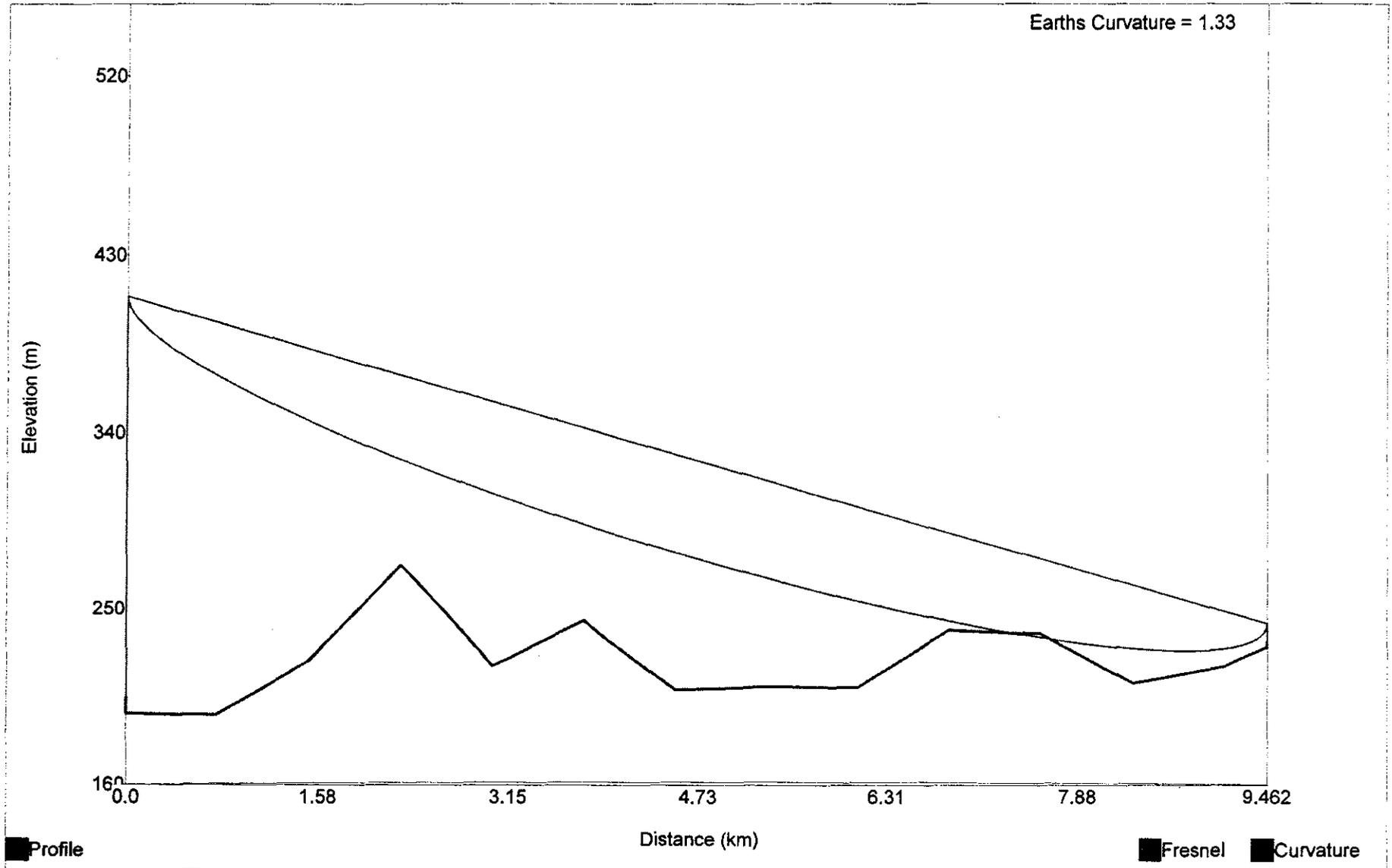
FCC 78 DBU CONTOUR

(C) 2006 CHARLES M. ANDERSON ASSOCIATES

Scale 1:150,000



E3 228A REFERENCE POINT LINE OF SIGHT TO HARRISON REFERENCE POINT



Starting Latitude: 35-07-06 N
 Starting Longitude: 085-14-29 W

End Latitude: 35-06-48 N
 End Longitude: 085-08-16 W

Distance: 9.46162022 km
 Bearing: 93.331 deg

Transmitter Height (AG) = 205.0 m
 Receiver Height (AG) = 9.1 m

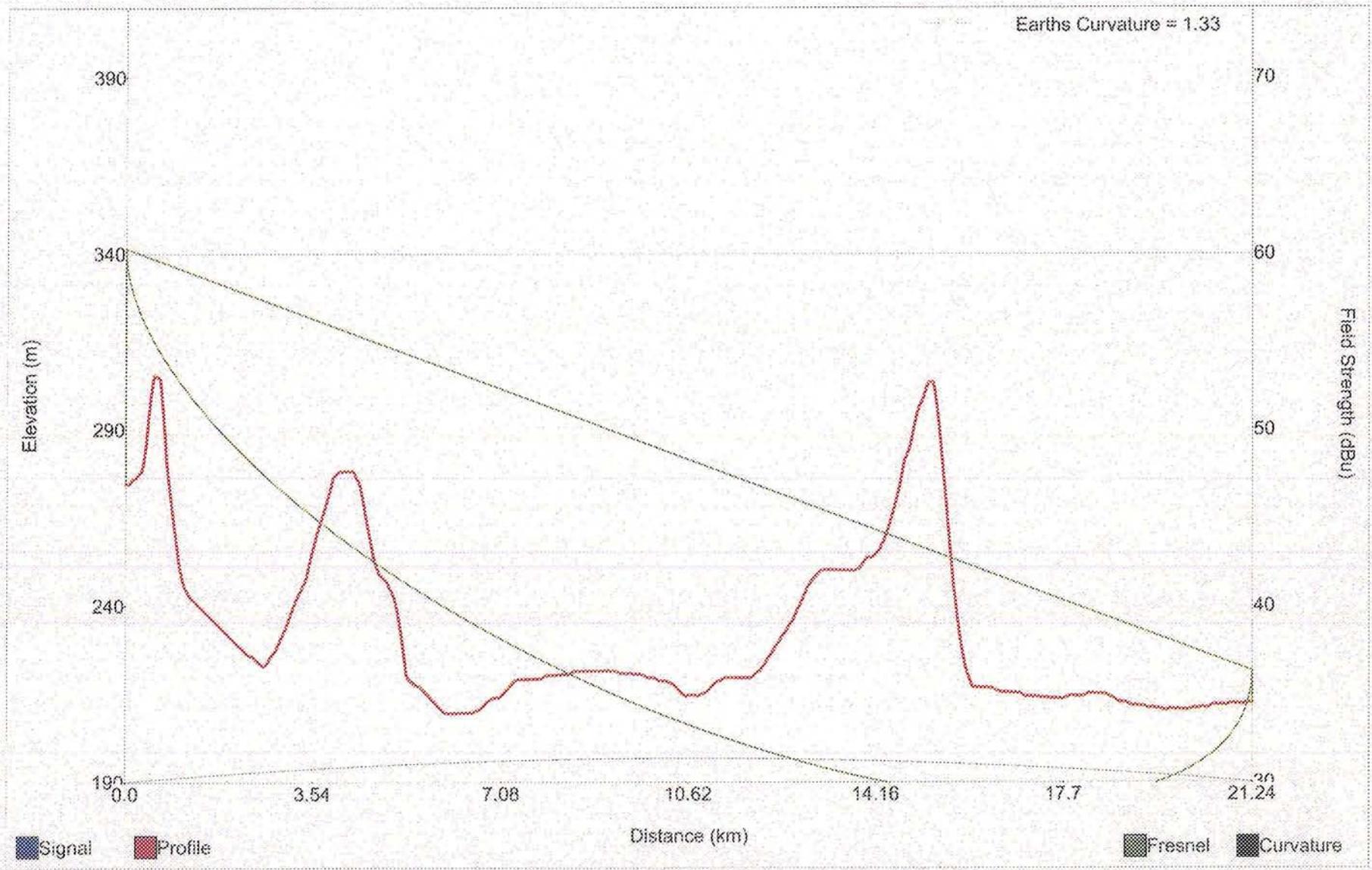
Transmitter Elevation = 204.2 m
 Receiver Elevation = 233.1 m

Frequency = 93.5 MHz
 Fresnel Zone: 0.6

EXHIBIT C

EXHIBIT D

WMPZ to Downtown Chattanooga



Starting Latitude: 34-53-46 N
 Starting Longitude: 085-10-18 W

End Latitude: 35-02-54.81 N
 End Longitude: 085-18-44.33 W

Distance: 21.24 km
 Bearing: 322.83 deg

Transmitter Height (AG) = 67.0 m
 Receiver Height (AG) = 9.1 m

Transmitter Elevation = 274.4 m
 Receiver Elevation = 212.6 m

Frequency = 93.7 MHz
 Fresnel Zone: 0.6

CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing "Comments Showing Cause, etc." were served by first-class United States mail, postage prepaid, on this 31st day of August, 2006 upon the following:

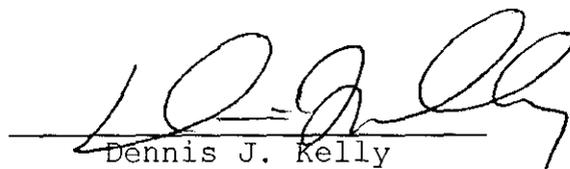
Lauren A. Colby, Esquire
Law Office of Lauren A. Colby
10 East 4th Street
Frederick, MD 21701
Counsel for Woman's World Broadcasting, Inc.

Mark N. Lipp, Esquire
Vinson & Elkins LLP
The Willard Office Building
1455 Pennsylvania Avenue, NW
Washington, DC 20004-1008
Counsel for J. L. Brewer Broadcasting
Of Cleveland LLC et al

Richard F. Swift, Esquire
Irwin Campbell & Tannenwald, PC
1730 Rhode Island Avenue, NW
Suite 200
Washington, DC 20036
Counsel for Bart Walker

Citadel Broadcasting Company
7201 W. Lake Mead Boulevard
Suite 400
Las Vegas, Nevada 89128

Brian M. Madden, Esquire
Leventhal Senter & Lerman, PLLC
Suite 600
2000 K Street, NW
Washington DC 20006
Counsel for Entercom Greenville License, LLC


Dennis J. Kelly