

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Amendment of Section 73.202(b)) MB Docket No. 07-164
Table of Allotments) RM--11386
FM Broadcast Station)
(Peach Springs, AZ))
)

To: Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW, TW-A325
Washington, DC 20554

FILED/ACCEPTED

OCT - 1 2007

Federal Communications Commission
Office of the Secretary

COUNTERPROPOSAL

Greenlight Media, LLC ("Greenlight") by this filing and its contemporaneously filed associated FCC Form 301 Application, hereby submits its counterproposal to the *Notice of Proposed Rule Making*, DA 07-3559 (released August 10, 2007) ("NPRM") in the above captioned proceeding. Greenlight proposes to allot a second local transmission service at Cameron, Arizona, on Channel 268C1 at the following coordinates: N35-51-59, W111-24-57 (NAD 27).

Greenlight hereby states that it will apply for Channel 268C1 at Cameron and participate in any FCC auction in order to construct facilities and commence operations at that community if the Commission grants the proposal. In order to allot Channel 268C1 at Cameron, Arizona, no

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other authorized facilities must make modifications. However, the following amendments to the FM Table of Allotments are requested in order to allot the proposed channel:

<u>CITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Ash Fork, AZ	267A	263A
Cameron, AZ	-----	268C1
Paulden, AZ	263C3	228C3
Peach Springs, AZ	285C3	281C3

Community Information:

Cameron, Arizona, is located in Coconino County, Arizona. It is listed in the 2000 U.S. Census with a population of 978 persons and is therefore considered to have the status of a community worthy of allotment purposes.¹ The Commission has determined that Cameron qualifies as a community worth allotment purposes by granting a construction permit for KYNN(AM) at Cameron. The United States Postal Service has assigned a zip code to Cameron, 86020, and this zip code is not shared with another community. In addition to a post office, other governmental offices in Cameron include the Arizona Department of Transportation, a Police Department, and the Navajo Nation Tribal Government. Cameron Elementary and Cameron Pre School serve the children of Cameron while the Cameron Senior Center serves its senior citizens. Religious offerings include the Cameron Assembly of God. The Navajo Parks and Recreation Department provide recreational activities in Cameron. Various private

¹ See *Arnold and Columbia California*, 7 FCC Red 6302 (1992).

companies also conduct business in Cameron including the Atkinson Trading Company, Black Mesa Pipeline, Cameron Trading Post, Cameron Motel, Chief Yellowhorse Trading Company, Giant Industries of Arizona, Marvin Construction, Painted Desert Trading Company, Robbins Auto Truck Repair, and Thriftway.

Mutual Exclusivity with the NPRM:

The instant counterproposal to add Channel 268C1 at Cameron, Arizona, conflicts with Smoke and Mirrors LLC's (the "Petitioner") proposal in the NPRM to allot Channel 268C3 to Peach Springs, Arizona, as a substitute channel. Although the Commission must favor Greenlight's counterproposal over the Petitioner's proposal since it provides second aural reception service to 1,615 residents in northern Arizona under priority 2 and second local transmission service to Cameron (Population 978) under priority 4, compared to the lesser priority 4 benefits afforded by the Petitioner's proposal,² the Commission can grant both proposals by substituting Channel 281C3 at Peach Springs instead of Channel 268C3.

Technical Compliance:

As indicated above, and shown in the Cameron Allotment Spacings Study in Exhibit 1, attached, Channel 268C1, at the instantly proposed Allotment Reference Coordinates of N35-51-59, W111-24-57 (NAD 27), conflicts with the NPRM to allot Channel 268C3 at Peach Springs. The study also shows that the proposed Cameron allotment would be short spaced to the Vacant Allotment assigned Channel 267A at Ash Fork, AZ. Exhibit 2 is a City-Grade coverage map showing that from the proposed Allotment Reference Coordinates, 100% of the community of Cameron is fully encircled by the theoretical Class C1 70 dBu City Grade contour. It is also

² See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982)

worth noting that this contour does not overlap any portion of a U.S. Census defined Urbanized Area. Exhibit 3 is a New Services Study showing that the new allotment will eliminate Gray Area to 1,615 persons under priority 2.

In order to eliminate the conflict to the NPRM, Channel 281C3 can be substituted at Peach Springs, Arizona. Exhibit 4 is a Peach Springs Allotment Spacings Study for Channel 281C3 from the site originally proposed by the Petitioner and identified in the NPRM. Exhibit 5 is a Peach Springs Alternate Site Allotment Spacings Study for Channel 281C3 using new Allotment Reference Coordinates proposed by the Petitioner in an amendment received at the Commission on September 7, 2007. As can be seen in both Exhibit 4 and Exhibit 5, Channel 281C3 is fully spaced pursuant to Section 73.207 to all other facilities at both sites and thereby allows the Petitioner to also achieve its goals.

In order to eliminate the conflict to the unused Vacant Allotment assigned Channel 267A at Ash Fork, Arizona, Greenlight requests that Channel 263A be substituted for Channel 267A at the current Allotment Reference Coordinates at Ash Fork. Exhibit 6 is an Ash Fork Allotment Spacings Study for Channel 263A from the current Allotment Reference Coordinates demonstrating that the proposed channel is shortspaced only to the unused Vacant Allotment assigned Channel 263C3 at Paulden, AZ.

In order to eliminate the conflict to the unused Vacant Allotment assigned Channel 263C3 at Paulden, Arizona, Greenlight requests that Channel 228C3 be substituted for Channel 263C3 at the new Allotment Reference Coordinates of N34-52-16, W112-33-00. Exhibit 7 is a Paulden Allotment Spacings Study for Channel 228C3 from the new site demonstrating that the proposed channel is fully spaced pursuant to Section 73.207 to all other facilities. Exhibit 8 is a City-Grade coverage map showing that, from the new Allotment Reference Coordinates, 100%

of the community of Paulden is fully encircled by the theoretical Class C1 70 dBu City Grade contour.

Conclusion:

The instant proposal furthers the Commission's allotment priorities by providing second aural reception service to 1,615 residents in northern Arizona under priority 2 and second local transmission service to Cameron, Arizona, (Population 978) under priority 4. It also provides a substitute channel at Peach Springs, Arizona, allowing the Petitioner to also accomplish its goals. In the event that Channel 268C1 is allotted to Cameron, Greenlight will participate in an FM Auction to acquire the station and, if authorized, will build the station promptly. For the foregoing reasons, the Commission should consider adding channel 268C1 at Cameron, Arizona.

I verify pursuant to Section 1.52 of the Commission's Rules that I have reviewed this document and that to the best of my knowledge, information, and belief, there are good grounds to support it.

Respectfully submitted,

Greenlight Media, LLC.

By:

Maura D. Sparks

Maura D. Sparks

Its:

Manager
249 Franklin St.
Napa, CA 94559

Dated: October 1, 2007

Exhibit 1

Cameron Allotment Spacings Study Channel 268C1 Cameron, AZ

REFERENCE
35 51 59.0 N.
111 24 57.0 W.

CLASS = C1 Int = B1
Current Spacings
Channel 268 - 101.5 MHz

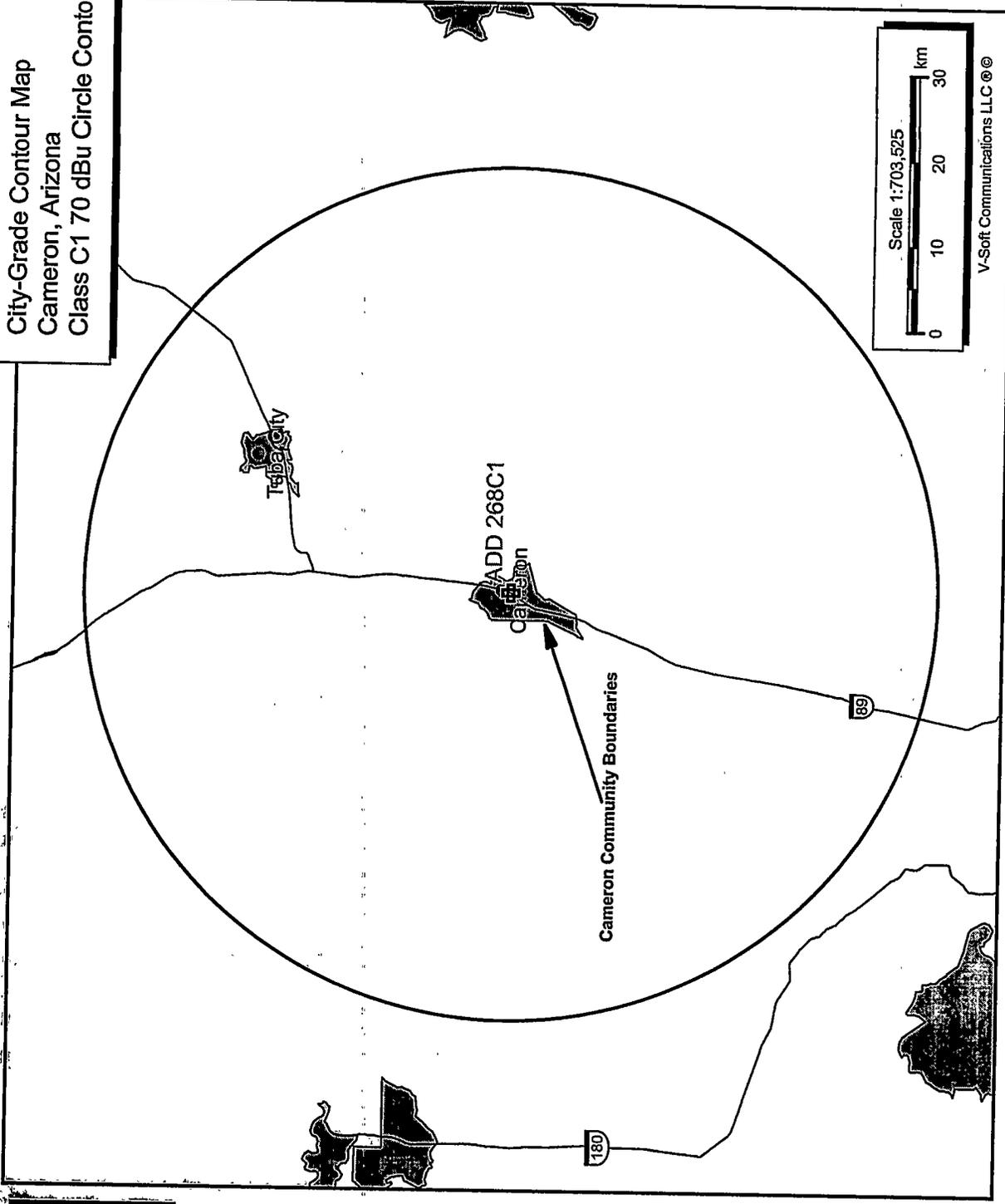
DISPLAY DATES
DATA 09-28-07
SEARCH 09-30-07

Call	Channel	Location	Azi	Dist	FCC	Margin
RADD	ADD 268C3	Peach Springs	AZ 260.2	187.42	211.0	-23.58
Conflict eliminated by substituting Channel 281C3 at this site for the Vacant Allotment at Peach Springs as proposed herein. See Exhibit 4.						
AL3225	VAC 267A	Ash Fork	AZ 237.3	121.63	133.0	-11.37
Conflict eliminated by substituting Channel 263A at this site at Ash Fork as proposed herein.						
RDEL	DEL 267A	Ash Fork	AZ 237.3	121.63	133.0	-11.37
No Conflict.						
RDEL	DEL 267A	Ash Fork	AZ 237.3	121.63	133.0	-11.37
No Conflict.						
RADD	ADD 268C3	Peach Springs	AZ 258.7	200.96	211.0	-10.04
Conflict eliminated by substituting Channel 281C3 at this site for the Vacant Allotment at Peach Springs as proposed herein. See Exhibit 3.						
KQLP	CP 268C1	Gallup	NM 95.9	248.23	245.0	3.23
KZON	LIC 268C	Phoenix	AZ 192.0	287.43	270.0	17.43
KAHM	LIC 271C	Prescott	AZ 206.1	145.54	105.0	40.54
RADD	ADD 267C3	Peach Springs	AZ 259.4	186.96	144.0	42.96

Exhibit 2

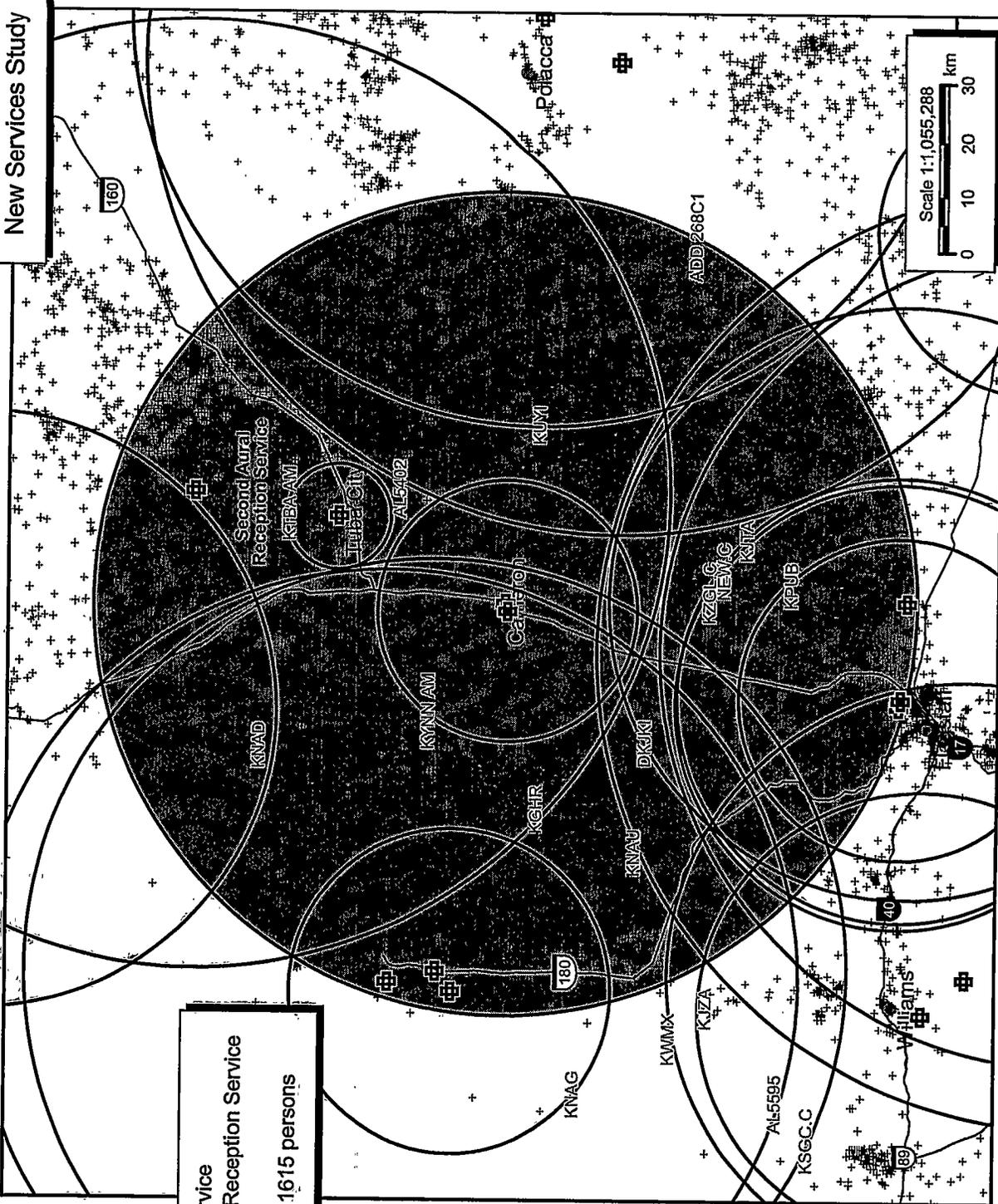
City-Grade Contour Map
Cameron, Arizona
Class C1 70 dBu Circle Contour

ADD 268C1
Cameron, AZ
Latitude: 35-51-59 N
Longitude: 111-24-57 W
Channel: 268 C1
Frequency: 101.5 MHz



Scale 1:703,525
0 10 20 30 km
V-Soft Communications LLC ©

Exhibit 3



ADD 268C1
 Cameron, AZ
 Latitude: 35-51-59 N
 Longitude: 111-24-57 W
 Channel: 268 C1
 Frequency: 101.5 MHz

Green Areas: New Service
Gray Areas: New 2nd Reception Service
Gray Area Eliminated: 1615 persons

New Services Study

Exhibit 4

Peach Springs Alternate Site Allotment Spacings Study Channel 281C3 Peach Springs, AZ

REFERENCE
35 29 35.0 N.
113 35 17.0 W.

CLASS = C3 Int = B1
Current Spacings
Channel 281 - 104.1 MHz

DISPLAY DATES
DATA 09-28-07
SEARCH 09-30-07

Call	Channel	Location	Azi	Dist	FCC	Margin
KAJM	CP -N 282C	Camp Verde	AZ 141.1	178.85	176.0	2.85
KAJM	APP-N 282C	Camp Verde	AZ 140.9	180.11	176.0	4.11
KCYE	LIC 282C	North Las Vegas	NV 287.5	180.94	176.0	4.94
RADD	ADD 280B	Essex	CA 243.6	150.98	145.0	5.98
KAJM	CP -N 282C0	Camp Verde	AZ 140.9	180.11	163.0	17.11
AL9633	VAC 280C	Toquerville	UT 7.8	197.23	176.0	21.23
RDEL	DEL 280B	Essex	CA 241.2	172.89	145.0	27.89
950921MK	VAC 280B	Essex	CA 241.3	172.92	145.0	27.92
KISF	LIC 278C	Las Vegas	NV 294.5	140.36	96.0	44.36
KAJM	LIC 282C	Payson	AZ 121.3	223.88	176.0	47.88

Exhibit 5

Peach Springs Allotment Spacings Study Channel 281C3 Peach Springs, AZ

REFERENCE
35 33 46.0 N.
113 27 12.0 W.

CLASS = C3 Int = B1
Current Spacings
Channel 281 - 104.1 MHz

DISPLAY DATES
DATA 09-28-07
SEARCH 09-30-07

Call	Channel	Location	Azi	Dist	FCC	Margin
KAJM	CP -N 282C	Camp Verde	AZ 145.8	177.76	176.0	1.76
KAJM	APP-N 282C	Camp Verde	AZ 145.5	178.95	176.0	2.95
AL9633	VAC 280C	Toquerville	UT 4.6	188.20	176.0	12.20
KCYE	LIC 282C	North Las Vegas	NV 284.3	190.59	176.0	14.59
KAJM	CP -N 282C0	Camp Verde	AZ 145.5	178.95	163.0	15.95
RADD	ADD 280B	Essex	CA 243.1	165.37	145.0	20.37
KAJM	LIC 282C	Payson	AZ 124.8	217.82	176.0	41.82
RDEL	DEL 280B	Essex	CA 241.0	187.33	145.0	42.33
950921MK	VAC 280B	Essex	CA 241.1	187.36	145.0	42.36
KISF	LIC 278C	Las Vegas	NV 289.9	148.77	96.0	52.77

Exhibit 6

Ash Fork Allotment Spacings Study Channel 263A Ash Fork, AZ

REFERENCE
35 16 13.0 N.
112 32 31.0 W.

CLASS = A Int = B1
Current Spacings
Channel 263 - 100.5 MHz

DISPLAY DATES
DATA 09-28-07
SEARCH 09-30-07

Call	Channel	Location	Azi	Dist	FCC	Margin	
AL1784	VAC 263C3	Paulden	AZ	170.9	43.47	142.0	-98.53
Conflict eliminated by substituting Channel 228C3 at coordinates N34-52-16, W112-33-00 (NAD 27) for the Vacant Allotment at Paulden as proposed herein.							
RDEL	DEL 263C3	Paulden	AZ	170.9	43.47	142.0	-98.53
No Conflict							
RDEL	DEL 263C3	Paulden	AZ	170.9	43.47	142.0	-98.53
No Conflict							
KKJJ	LIC 263C	Henderson	NV	291.0	237.69	226.0	11.69
RADD	ADD 266C	Spring Valley	AZ	169.8	114.90	95.0	19.90
KNRJ	APP-N 266C	Cordes Lakes	AZ	172.0	116.06	95.0	21.06
RADD	ADD 266C	Cordes Lakes	AZ	146.3	122.65	95.0	27.65
KNRJ	RSV 266C	Cordes Lakes	AZ	146.3	122.65	95.0	27.65
KVNA-FM	RSV 261C1	Flagstaff	AZ	92.3	103.22	75.0	28.22
KVNA-FM	RSV 261C1	Flagstaff	AZ	92.3	103.22	75.0	28.22
KVNA-FM	LIC 261C2	Flagstaff	AZ	109.4	100.03	55.0	45.03
KSLX-FM	LIC 264C	Scottsdale	AZ	168.3	219.54	165.0	54.54
KNRJ	LIC 266C1	Payson	AZ	134.3	133.01	75.0	58.01
RDEL	DEL 266C1	Payson	AZ	134.3	133.01	75.0	58.01

Exhibit 7

Paulden Allotment Spacings Study Channel 228C3 Paulden, AZ

REFERENCE
34 52 16.0 N.
112 33 00.0 W.

CLASS = C3 Int = B1
Current Spacings
Channel 228 - 93.5 MHz

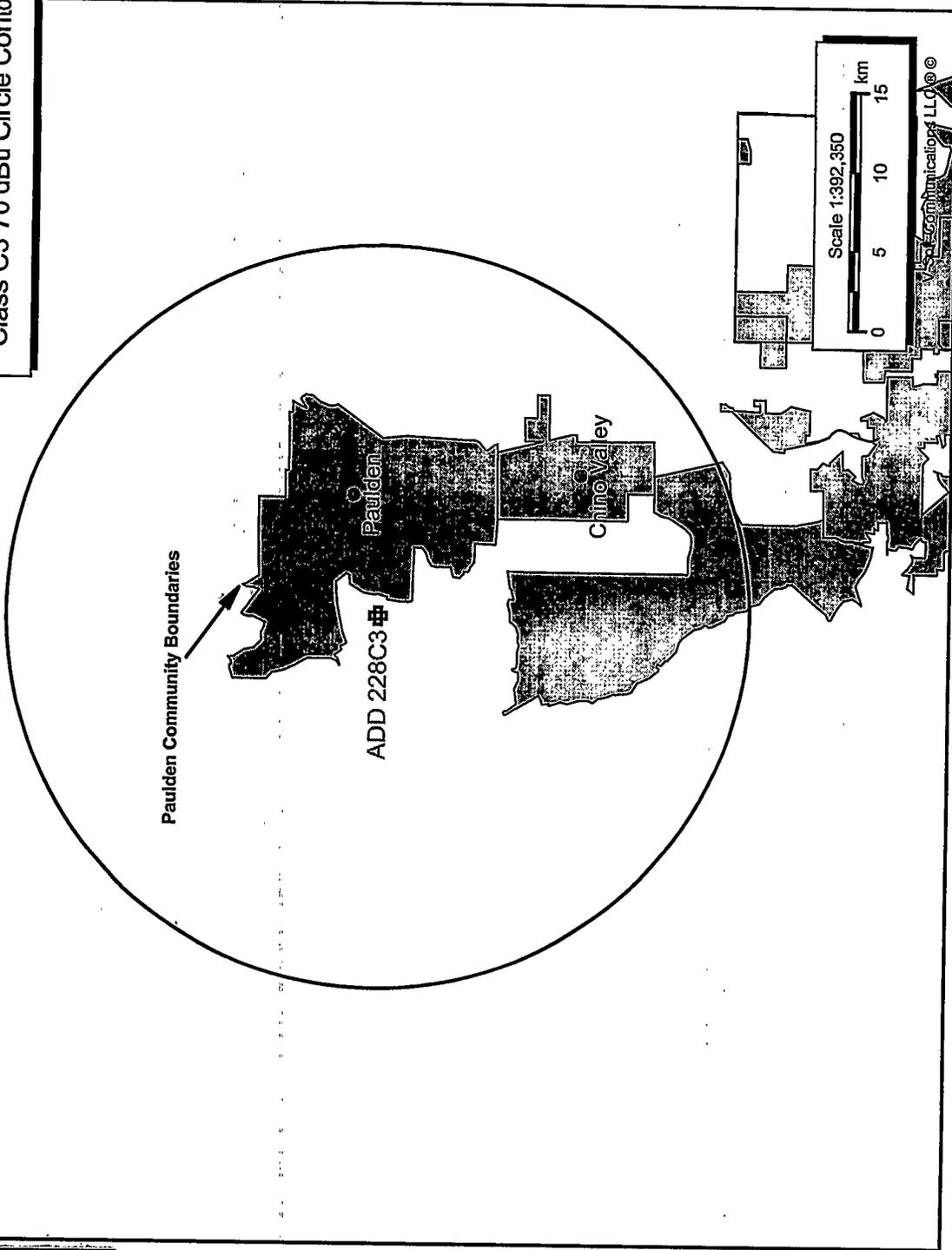
DISPLAY DATES
DATA 09-28-07
SEARCH 09-30-07

Call	Channel	Location	Azi	Dist	FCC	Margin
RADD	ADD 228C3	Paulden	AZ 0.0	0.00	153.0	-153.00
Proposed substitution of Channel 228C3 for Channel 263C3 also at Paulden as proposed by Sierra H Broadcasting in a "Hybrid" Application/Petition for Rule Making that has not yet been issued by the Commission. The instant proposal, although identical to that which is proposed by Sierra H, is not contingent upon Sierra H's proposal.						
RADD	ADD 228C3	Paulden	AZ 0.0	0.00	153.0	-153.00
Proposed substitution of Channel 228C3 in MB Docket 05-263 (now dismissed).						
KADD	LIC 228C1	Laughlin	NV 276.7	166.83	211.0	-44.17
Channel 228C1 was deleted from Laughlin in MB Docket 01-135.						
KMGN	LIC 230C	Flagstaff	AZ 83.2	95.85	96.0	-0.15
KAFF-FM	LIC 225C	Flagstaff	AZ 83.2	95.95	96.0	-0.05
KDKB	LIC 227C	Mesa	AZ 165.1	176.34	176.0	0.34
KADD	CP 228C	Logandale	NV 324.6	241.90	237.0	4.90
KMGN	RSV 230C0	Flagstaff	AZ 83.2	95.85	87.0	8.85
KMGN	APP 230C0	Flagstaff	AZ 83.2	95.85	87.0	8.85
AL4516	VAC 229C3	Wickenburg	AZ 197.2	113.08	99.0	14.08
RADD	ADD 226C3	Bagdad	AZ 242.2	83.00	43.0	40.00
KAJM	CP -N 282C	Camp Verde	AZ 166.6	72.64	31.0	41.64
KAJM	APP-N 282C	Camp Verde	AZ 165.6	73.46	31.0	42.46
AL3336	RSV 228C	Logandale	NV 322.2	279.99	237.0	42.99
KAJM	CP -N 282C0	Camp Verde	AZ 165.6	73.46	27.0	46.46

Exhibit 8

**City-Grade Contour Map
Paulden, Arizona
Class C3 70 dBu Circle Contour**

ADD 228C3
Latitude: 34-52-16 N
Longitude: 112-33-00 W
Channel: 228 C3
Frequency: 93.5 MHz



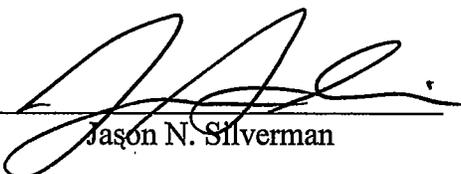
Certificate of Service

I, Jason N. Silverman, hereby certify that on October 1, 2007, copies of the foregoing "Counterproposal" have been served via U.S. mail, postage prepaid, or by hand delivery upon the following persons:

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