

FEB 11 2008

FCC Mail Room

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of 73.202(b))	MB Docket No.07-279
FM Table of Allotments)	RM-11411
FM Broadcast Stations)	RM-
(Iola, Texas)	
(Normangee, Texas))	

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

COUNTERPROPOSAL

Katherine Pyeatt (hereinafter "Pyeatt"), licensee of radio station KKL B(FM) in Madisonville, Texas, (facility No. 166036) pursuant to Sections 1.415 and 1.420 of the Commission's Rules hereby files the instant Counterproposal in response to the Notice of Proposed Rulemaking ("NPR") issued in the above-captioned proceeding as released December 21, 2007, (DA 07-5037).

PRELIMINARY STATEMENT

The essential purpose of this counterproposal is to add a new first service to the community of Normangee, TX, and to upgrade the construction permit for station KKL B, currently licensed to operate on channel 267A in Madisonville, to operate on channel 299C3 from a new

transmitter site location still meeting all requirements for its improved service to Madisonville. It is "Pyeatt's" proposed use of channel 299C3 as a replacement for 267A that is in conflict with the original petitioners proposed use of 299A at Iola, Texas. This change, which is essential to "Pyeatt's" proposal, is in conflict with the original petition as proposed in the NPR and appropriate for consideration in this proceeding. The following summarizes the changes requested in this counterproposal.

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Normangee, Tx	-----	267A
Madisonville, TX	267A	299C3

Proposed 1st service to Normangee, Texas

Petitioner respectfully submits that the public interest would be served by allocating Channel 267A to Normangee, Texas¹ as that community's first FM service. Normangee is an incorporated community with a population of 719 people.² Eighty six (86) businesses in Normangee have been given a credit rating by Dun & Bradstreet as of

¹ Pursuant to Revision of Procedures Governing Amendments to FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services, 21 FCC Rcd 14212 (2006) ("Streamlining R&O"), Katherine Pyeatt is contemporaneously filing a Form 301 application for this proposal along with the requisite filing fee. Should this channel be allotted to Normangee, Texas, Katherine Pyeatt hereby states that she will construct the facility specified in the form 301. The filing of this form 301 is in accordance with the requirements as set forth in Revision of Procedures Governing Amendments to FM Table of Allotments and Changes in the Radio Broadcast services, 21 FCC Rcd, 14212 (2006) at pa. 18 and 20.

²2000 Census

November 2002.³ Normangee has its own school district,⁴ Fire Department⁵, post office⁶ and a number of local churches. Normangee is a community that is certainly deserving of a first FM service. "Local radio stations play an important role in their communities, providing local news, information and entertainment to residents, and generally serving as good corporate citizens in the local community life. This is particularly true in smaller towns where the radio stations are limited in number. Yet there are still rural areas of our country that do not have even a local radio station."⁷ The proposed channel 267A will provide additional diversity and an outlet for local self-expression to Normangee residents and therefore is in the public interest.

Attached hereto is a channel study confirming that Channel 267A can be allocated to Normangee, Texas, consistent with Section 73.207 of the Commission's Rules⁸ with respect to all existing and proposed domestic allotments and facilities, provided a change is made with

³ 2004-2005 Texas Almanac

⁴ Normangee Independent School District

⁵ City of Normangee Fire Department, 301 E. 1st St., Normangee, Texas (936) 396 3131.

⁶ US Post Office, 501 Hollis St., Normangee, Texas (936) 396 4422.

⁷ Statement of Commissioner Kevin J. Martin, MM & O, MM Docket 99-240, released May 20, 2004.

⁸ 47 C.F.R. 73.207.

Channel 267A/ Madisonville. (See, Attachment A) Note, the counterproposal to add channel 267A to Caldwell, Texas, incorporated in MB Docket No. 06-66, was dismissed per Report & Order, (DA 07-4125), released October 5, 2007.

(See, Attachment B) A 70 dBu signal can be provided to Normangee from the proposed reference coordinates.

Reference coordinates for Channel 267A at Normangee, Texas are:

31 04 06 N
96 01 24 W

As "Pyeatt" is making this request for a new channel to be allotted to Normangee, she has simultaneously with the filing of this Counterproposal electronically filed her own FCC form 301 requesting a permit to operate on that channel in Normangee as requested by her in this Counterproposal, if allotted by the Commission, and to participate in the auction for that channel and, if selected there as the Permittee, to proceed to build and operate the channel as requested, and it affirms that commitment here.

The Proposed Change in Channel at KKLB(FM), Madisonville, Texas, from 267A to 299C3 in lieu of the Proposed Channel 299A at Iola, Texas

In order for channel 267A to be allotted at Normangee, Texas, a change must be made with KKLB(FM), Madisonville.

KKLB's move from 267A to 299C3 will allow for a 1st service to Normangee, Texas and improve KKLB's coverage of Madisonville. Attached hereto is a channel study confirming that Channel 299C3 can be allocated to Madisonville, Texas, in lieu of the proposed channel 299A at Iola, Texas, consistent with Section 73.207 of the commission's Rules with respect to all existing and proposed domestic allotments and facilities. (See, Attachment C) Note, the petition to add channel 299A to Normangee, Texas, and the related counterproposal to add channel 297C3 to Bedias, Texas, both incorporated in MB Docket No. 06-66, were dismissed per Report & Order, (DA 07-4125), released October 5, 2007. (See Attachment B) A 70 dBu signal can be provided to Madisonville from the proposed reference coordinates.

The reference coordinates for Channel 299C3 at Madisonville, Texas are:

30 53 45 N
96 04 31 W

The actual proposed antenna location for 299C3 at Madisonville, Texas, from which a 70 dBu signal can be provided are:

30 50 15 N
96 03 54 W

(See, Attachment D)

In seeking to implement this change at Madisonville, "Pyeatt" has simultaneously with filing of this Counterproposal electronically filed its form 301 along with the requisite filing fee for this proposal requesting the change in site location and operating channel from 267A to 299C3 and has committed there and commits again here to proceed to build and operate the station on that new channel and site location upon grant of this Counterproposal and application by the Commission.

SUMMARY

In sum, it is respectfully requested that the Commission amend the FM table of Allotments as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Normangee, TX	-----	267A
Madisonville, TX	218C1, 241C2, 263C3, 267A	218C1, 241C2, 263C3, 299C3

It is therefore respectfully submitted that the instant Counterproposal is clearly superior to the original proposal for Iola, Texas, as set forth in the NPR and preferable to that original proposal since it will provide for a new FM first service to a larger community and will also enable the change of channel from 267A at Madisonville

to 299C3 thereby resulting in an increase in service to both area and population.

For these reasons, it is respectfully submitted that the instant Counterproposal which proposes a 1st service to Normangee and improved coverage to Madisonville, is clearly in the public interest and should be adopted in lieu of the NPRM which proposes only a 1st service to Iola, Texas.

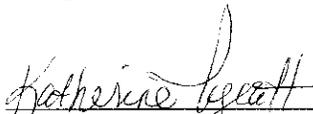
I hereby certify that should this Counterproposal be granted and Channel 267A is allotted to Normangee, Texas as specified in my petition and in my Form 301 for this channel which I have simultaneously electronically filed with this Counterproposal along with the requisite Form 301 filing fee, I will participate in the auction for the channel. Additionally, I certify that should the proposed change at Madisonville requesting the change in site location and operating channel from 267A to 299C3 be granted, I commit here to proceed to build and operate the station on that new channel and site location upon grant of this Counterproposal and application by the Commission.⁹

The factual information provided in this

⁹ In seeking to implement this change at Madisonville, Pyeatt has simultaneously with filing of the Counterproposal electronically filed its form 301 along with the requisite filing fee, requesting the change in site location and operating channel form 267A to 299C3 and has committed there and commits again here to proceed to build and operate the station on that new channel and site location.

Counterproposal is correct and true to the best of my
knowledge.

Respectfully submitted,



Katherine Pyeatt
2215 Cedar Springs Rd., #1910
Dallas, Texas 75201
(214) 991-9363

cc: Gene A. Bechtel, Law Office of Gene Bechtel, Suite
600, 1050 17th Street, N.W., Washington, D.C. 20036,
Telephone (301) 340-1651, telecopier (301) 340-6811,
attorney for Katherine Pyeatt. It is requested that the
Commission and any parties who may file pleadings in the
captioned matter serve copies to Mr. Bechtel as well as Ms
Pyeatt.

February 11, 2008

Attachment A

(Channel Study for channel 267A at Normangee, Texas)

**Counter Proposal
MB Doc 07-279
Iola, TX**

**New 267A
Normangee, TX
31-04-06 / 96-01-24**

**FIGURE A - TOPOGRAPHIC MAP
FCC Reference Point - 267A**

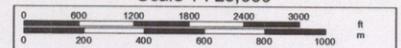


New Allotment - Normangee, TX

KKLB - Non-Adjacent Upgrade
February 2008



Scale 1 : 25,000



1" = 2,083.3 ft

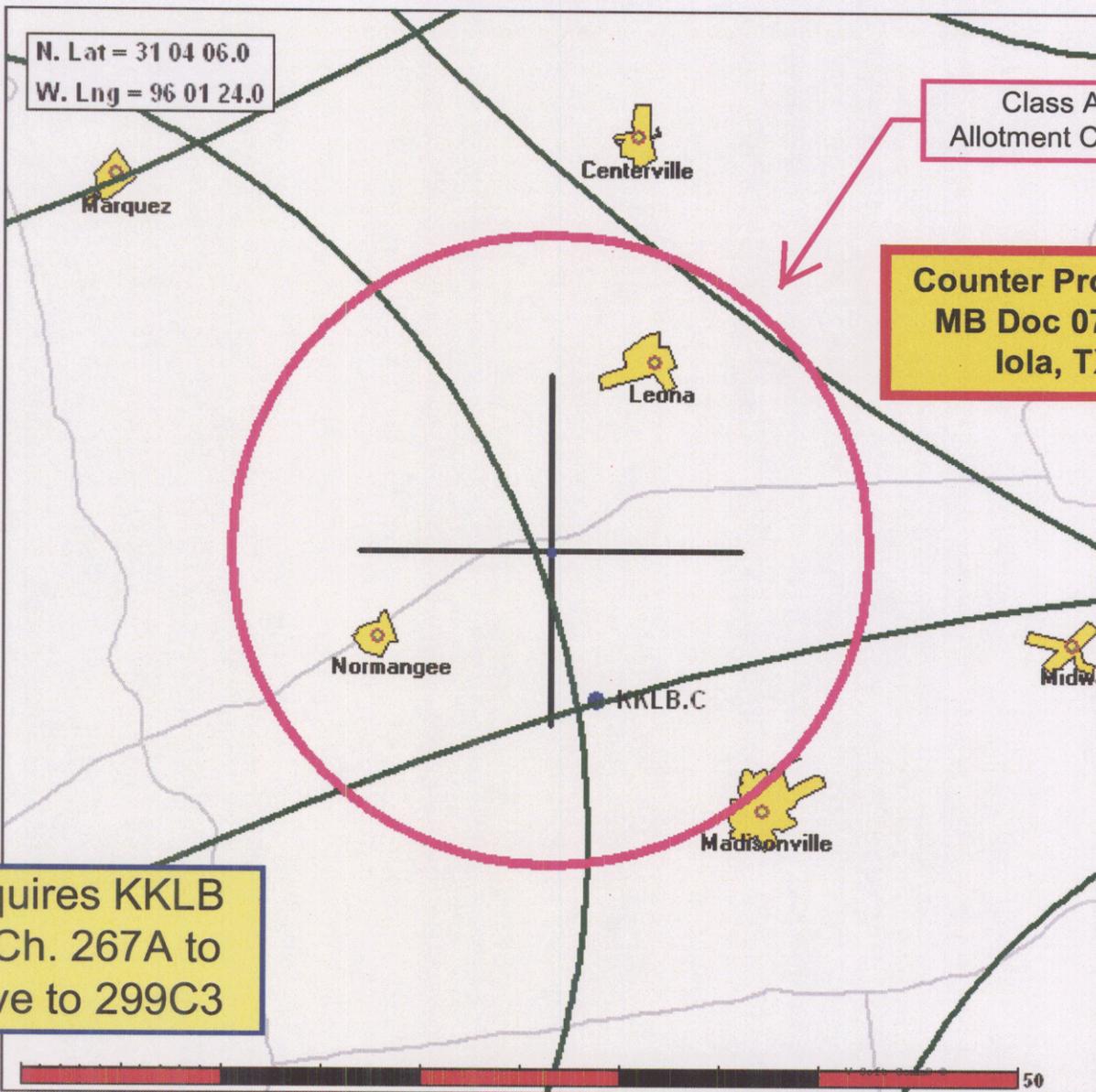
Data Zoom 13-0

CH 267 A 101.3 MHz

Current Spacings to 3rd Adj.

Katherine Pyeatt

February 2008



Requires KKL.B.C
on Ch. 267A to
move to 299C3

Class A
Allotment Circle

Counter Proposal
MB Doc 07-279
Iola, TX

Data Date:02-07-08 Job Date:02-08-08

Call	CH#	Type	Location		Azi	D-KM	FCC	Margin	
KKL.B.C	267A	CP	Madisonville	TX	163.3	7.91	114.5	-106.59	Move to 299C3
KBXT	270C3	LIC	Franklin	TX	249.5	42.26	41.5	0.76	
KLOL	266C	LIC	Houston	TX	163.3	172.62	164.5	8.12	
KNUE	268C0	LIC	Tyler	TX	37.2	166.73	151.5	15.23	
WRR	266C	LIC	Dallas	TX	332.4	190.82	164.5	26.32	
AP0333	214C3	APP-D	Buffalo	TX	350.8	40.30	11.5	28.80	

FIGURE B - FM CHANNEL STUDY FCC Reference Point - 267A



New Allotment - Normangee, TX

KKL.B.C - Non-Adjacent Upgrade

February 2008

Attachment B

(Report & Order, (DA 07-4125), MB Docket No. 06-66,
dismissing the proposed move of 267A/ Madisonville to
Caldwell)

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b),)	
FM Table of Allotments,)	MB Docket No. 06-43
FM Broadcast Stations.)	RM-11313
(Oakwood, Texas))	
)	
(Normangee, Texas))	MB Docket No. 06-66
)	RM-11321

REPORT AND ORDER
(Proceeding Terminated)

Adopted: October 3, 2007

Released: October 5, 2007

By the Assistant Chief, Audio Division, Media Bureau:

1. The Audio Division has before it two *Notices of Proposed Rule Making*.¹ We are consolidating these two proceedings because the counterproposals filed in each proceeding are mutually exclusive.² Charles Crawford filed comments and a 'Request for Approval of Withdrawal' ("Withdrawal Request") in both MB Docket No. 06-43 and MB Docket No. 06-66. Linda Crawford filed a counterproposal in MB Docket No. 06-43 and 'Request for Approval of Withdrawal.' In MB Docket No. 06-66, Roy Henderson, ("Henderson"), licensee of Station KHTZ, (*formerly* KLTR), Channel 297A, Caldwell, Texas, filed a counterproposal, 'Motion for Leave to Supplement Comments and Counterproposal,' and 'Memorandum of Law.' No other comments or counterproposals were received in response to this proceeding.

2. **Background.** The *Notice* in MB Docket No. 06-43, proposed the allotment of Channel 300A at Oakwood, Texas, as its first local service. Charles Crawford filed timely comments, reiterating its expression of interest in the proposed Oakwood allotment but later filed a Withdrawal Request in compliance with Section 1.420(j) of the Rules, stating that he desires to withdraw his petition and expression of interest.

3. In response to this *Notice*, Linda Crawford filed a timely counterproposal, requesting the allotment of Channel 299C3 at Bédias, Texas, as its first local service and Channel 300A at Oakwood, Texas at new reference coordinates to resolve the conflict with the *Notice*'s proposal. Linda Crawford requested to withdraw her counterproposal after the proceeding closed. This request complied with Section 1.420(j) requirements.

4. The *Notice* in MB Docket No. 06-66, proposed the allotment of Channel 299A at Normangee,

¹ See *Oakwood, Texas*, Notice of Proposed Rule Making, 21 FCC Rcd 1643 (MB 2006) ("*Notice*") and *Normangee, Texas*, Notice of Proposed Rule Making, 21 FCC Rcd 3315 (MB 2006) ("*Notice II*").

² These two proceedings are being consolidated because the counterproposal, requesting the allotment of Channel 299C3 at Bédias, Texas filed by Linda Crawford in connection with MB Docket No. 06-43 conflicts with the counterproposal, proposing the reallocation of FM Station KHTZ from Channel 297A at Caldwell, Texas to Channel 297C3 at Bédias, Texas filed by Roy Henderson in MB Docket No. 06-66.

Texas, as its first local service. In compliance with Section 1.420(j) of the Rules, Charles Crawford later filed a Withdrawal Request, stating that he desires to withdraw his petition and expression of interest for Channel 299A at Normangee.

5. In response to this *Notice*, Henderson filed a timely counterproposal, requesting the reallocation of FM Station KHTZ, Channel 297A at Caldwell to Channel 297C3 at Bedias, Texas, as its first local service and modification of the FM Station KHTZ license; and the reallocation of FM Station KKLB, Channel 267A from Madisonville to Caldwell, Texas, to prevent removal of Caldwell's sole local service and modification of the FM Station KKLB authorization. Henderson filed a Memorandum of Law, stating that this proceeding is no longer contested and its proposal results in a preferential arrangement of allotments, under the Commission's FM allotment priorities.³ Moreover, Henderson states that its proposal does not violate the Commission's backfill policy.⁴

6. **Discussion.** In compliance with Section 1.420(j) of the Rules, we will grant both requests of Charles Crawford to withdraw its petitions for Channel 300A at Oakwood, Texas, and Channel 299A at Normangee, Texas; and the request of Linda Crawford to withdraw her counterproposal filed in connection with MB Docket No. 06-43. Each party has filed an affidavit pursuant to Section 1.420(j) of the Rules, certifying that it has not nor will not receive, either directly or indirectly, any money or other consideration in connection with its respective withdrawal request. A showing of continuing interest is required before a channel is allotted to a community in compliance with the *Appendix* to the *Notice*. It is the Commission's policy to refrain from making a new allotment to a community absent an expression of interest. As such, we are dismissing the petitions, requesting the allotment of Channel 300A at Oakwood, Texas, and Channel 299A at Normangee, Texas, along with the counterproposal filed by Linda Crawford in accordance with Section 1.420(j) of the Rules.

7. We are also dismissing Henderson's counterproposal. Specifically, the proposed reallocation of FM Station KKLB, Channel 267A from Madisonville to Caldwell, Texas conflicted with the proposed allotment of Channel 267A at Rosebud, Texas, requested in MB Docket No. 05-229.⁵ The proposed Rosebud allotment was still under consideration when Henderson filed its counterproposal. Counterproposals are required to be "technically correct and substantially complete" when filed and non-dependent on final actions in another proceeding.⁶ In allocation proceedings, a counterproposal is deemed defective if it conflicts with, or contingent upon, a cut-off proposal or a non-final decision in another proceeding.⁷ This policy not only affords protection to parties entitled to cut-off protection, it

³ See *Revision of FM Assignment Policies and Procedures*, Second Report and Order, 90 FCC 2d 88 (1988).

⁴ See *Pacific Broadcasting of Missouri, LLC*, Memorandum Opinion and Order, 18 FCC Rcd 2291 (MB 2003); *recon denied*, Memorandum Opinion and Order, 19 FCC Rcd 10950 (2004) (stating that vacant allotments can no longer be used as a backfill for the purposes of replacing the community's sole local service).

⁵ See *Rosebud and Madisonville, Texas*, Report and Order, 21 FCC Rcd 7898 (MB 2006); *recon denied*, Memorandum Opinion and Order, 22 FCC Rcd 3795 (MB 2007).

⁶ See *Saint Joseph, Louisiana et al.*, Memorandum Opinion and Order, 21 FCC Rcd 2254 (MB 2006) (stating that the counterproposal was properly dismissed as an impermissibly contingent proposal; and that counterproposal are required to be technically correct and substantially complete when filed).

⁷ See *Amboy, California, et al.*, Report and Order, 19 FCC Rcd 12405 (MB 2004), *citing Pinewood, South Carolina*, Memorandum Opinion and Order, 5 FCC Rcd 7609 (1990) (stating that it was proper to dismiss a petition conflicting with a cut-off counterproposal in another proceeding); *Auburn, Alabama, et al.*, Memorandum Opinion and Order, 18 FCC Rcd 10333 (MB 2003) (accepting only rulemaking proposals that rely upon actions in earlier rulemaking proceedings that are effective but not final); *Kaukauna and Cleveland, Wisconsin*, 6 FCC Rcd 7142 (MMB 1991) (continued....)

also is essential to the efficient processing of proposed changes to the FM Table of Allotments. Processing proposals that are not capable of being effectuated on the date of filing would cause an unnecessary expenditure of Commission resources and would impose an unfair burden on other parties.⁸

8. This document is not subject to the Congressional Review Act. (The Commission, is, therefore, not required to submit a copy of this Report and Order to GAO, pursuant to the Congressional Review Act. *see* 5 U.S.C. 801(a)(1)(A) because the proposed rule was dismissed.

9. Accordingly, IT IS ORDERED, That the Petitions for Rule Making filed by Charles Crawford for Channel 300A at Oakwood, Texas and Channel 299A at Normangee, Texas, ARE DISMISSED.

10. IT IS FURTHER ORDERED, That the counterproposal filed by Linda Crawford, IS DISMISSED.

11. IT IS FURTHER ORDERED, That the counterproposal filed by Henderson, IS DISMISSED.

12. IT IS FURTHER ORDERED, That this proceeding IS TERMINATED.

13. For further information concerning this proceeding, contact Rolanda F. Smith, Media Bureau, (202) 418-2180.

FEDERAL COMMUNICATIONS COMMISSION

John A. Karousos
Assistant Chief
Audio Division
Media Bureau

(Continued from previous page) _____
(stating that the counterproposal was not acceptable for rule making because it was short-spaced to cut-off proposal in another proceeding).

⁸ See *Cut and Shoot, Texas* 11 FCC Red 16383, 16384 (MMB 1996). (processing petitions for rule making which are contingent upon action by third parties "is not conducive to the efficient transaction of Commission business and imposes unnecessary burdens") See also *Auburn, supra* (processing contingent proposals is inefficient because "[t]he staff would either have to wait until the contingency is met, thereby further delaying action in a case, or would have to revisit a decision if a proposal was granted contingent on the outcome of an action that never occurred").

Attachment C

(Channel Study reference coordinates for the proposed
channel 299C3/ Madisonville, Texas)

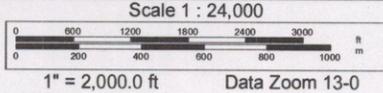
**Counter Proposal
MB Doc 07-279
Iola, TX**

**KKLB RM
Ch. 299C3
30-53-45 / 96-04-31**

**FIGURE 1 - TOPOGRAPHIC MAP
FCC Reference Point - 299C3**

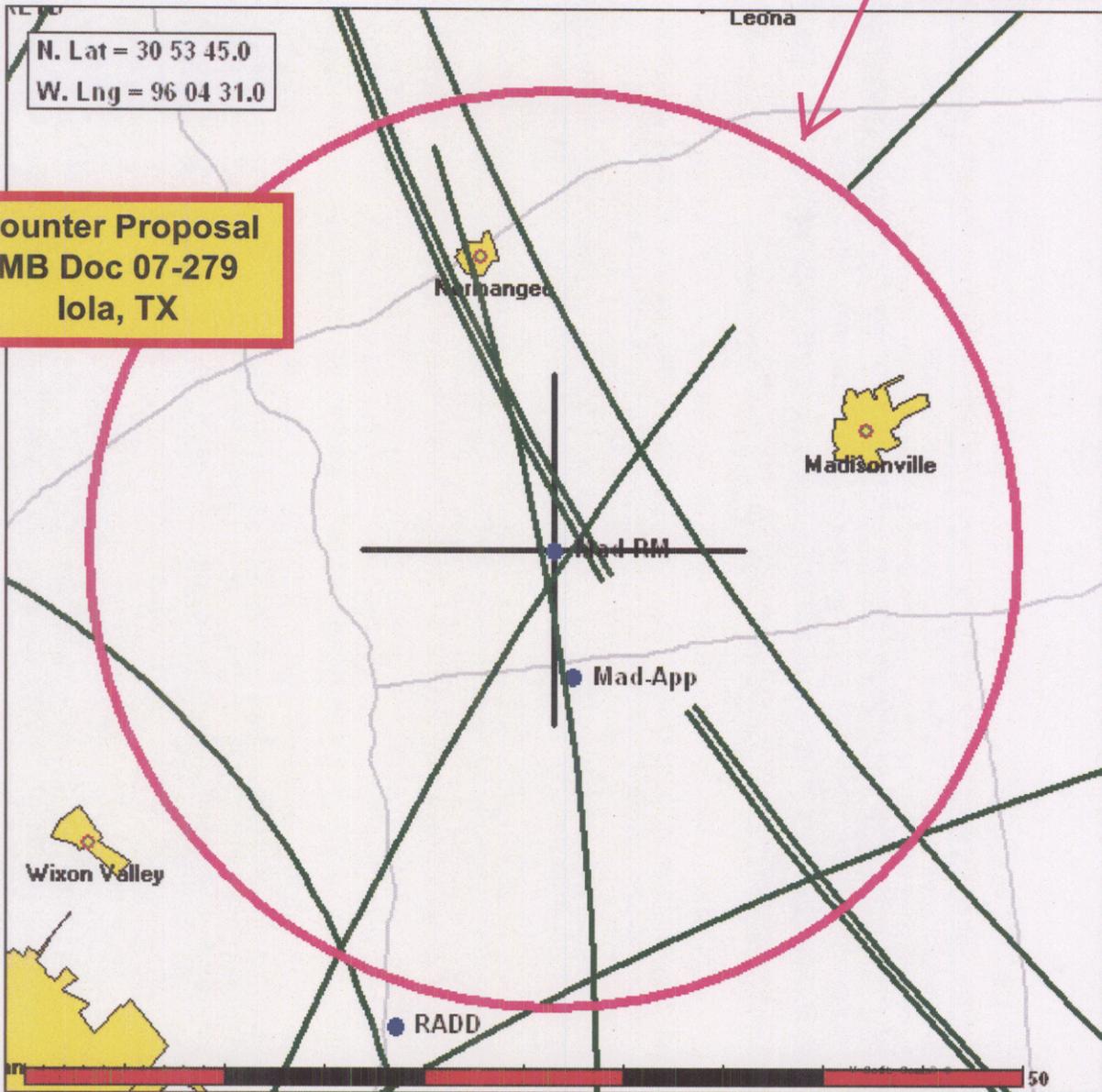


**RADIO STATION KKL
Ch. 299C3 - Madisonville, TX
Non-Adjacent Upgrade
February 2008**



CH 299 C3 107.7 MHz
 Current Spacings to 3rd Adj.

C3
 Allotment Circle



Call	CH#	Type	Location	Job	Azi	D-KM	FCC	Margin
Mad-RM	299C3	ADD	Madisonville	TX	0.0	0.00	152.5	-152.50
Mad-App	299C3	ADD	Madisonville	TX	171.4	6.54	152.5	-145.96
RADD	299A	ADD	Iola	TX	198.2	25.38	141.5	-116.12
KINV	299C3	LIC N	Georgetown	TX	258.9	153.07	152.5	0.57
KQQK	300C	LIC N	Beaumont	TX	123.3	176.22	175.5	0.72
KTBQ	299C3	LIC N	Nacogdoches	TX	59.9	153.83	152.5	1.33
KTBQ.C	299C3	CP N	Nacogdoches	TX	59.9	154.32	152.5	1.82

FIGURE 4 - FM CHANNEL STUDY
FCC Reference Point - 299C3



RADIO STATION KKL B
 Ch. 299C3 - Madisonville, TX
 Non-Adjacent Upgrade
 February 2008

Attachment D

(Channel Study actual antenna location of the proposed
channel 299C3/ Madisonville, Texas)

**Counter Proposal
MB Doc 07-279
Iola, TX**

**KKLB App
Ch. 299C3 73.215
30-50-15 / 96-03-54
93.0 m (305') AMSL**

**FIGURE 1-A - TOPOGRAPHIC MAP
Proposed Site - 299C3**



**RADIO STATION KKL
Ch. 299C3 - Madisonville, TX
Non-Adjacent Upgrade
February 2008**

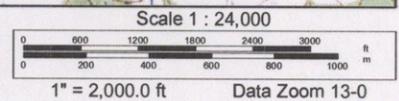


FIGURE 2 - PROPOSED COVERAGE

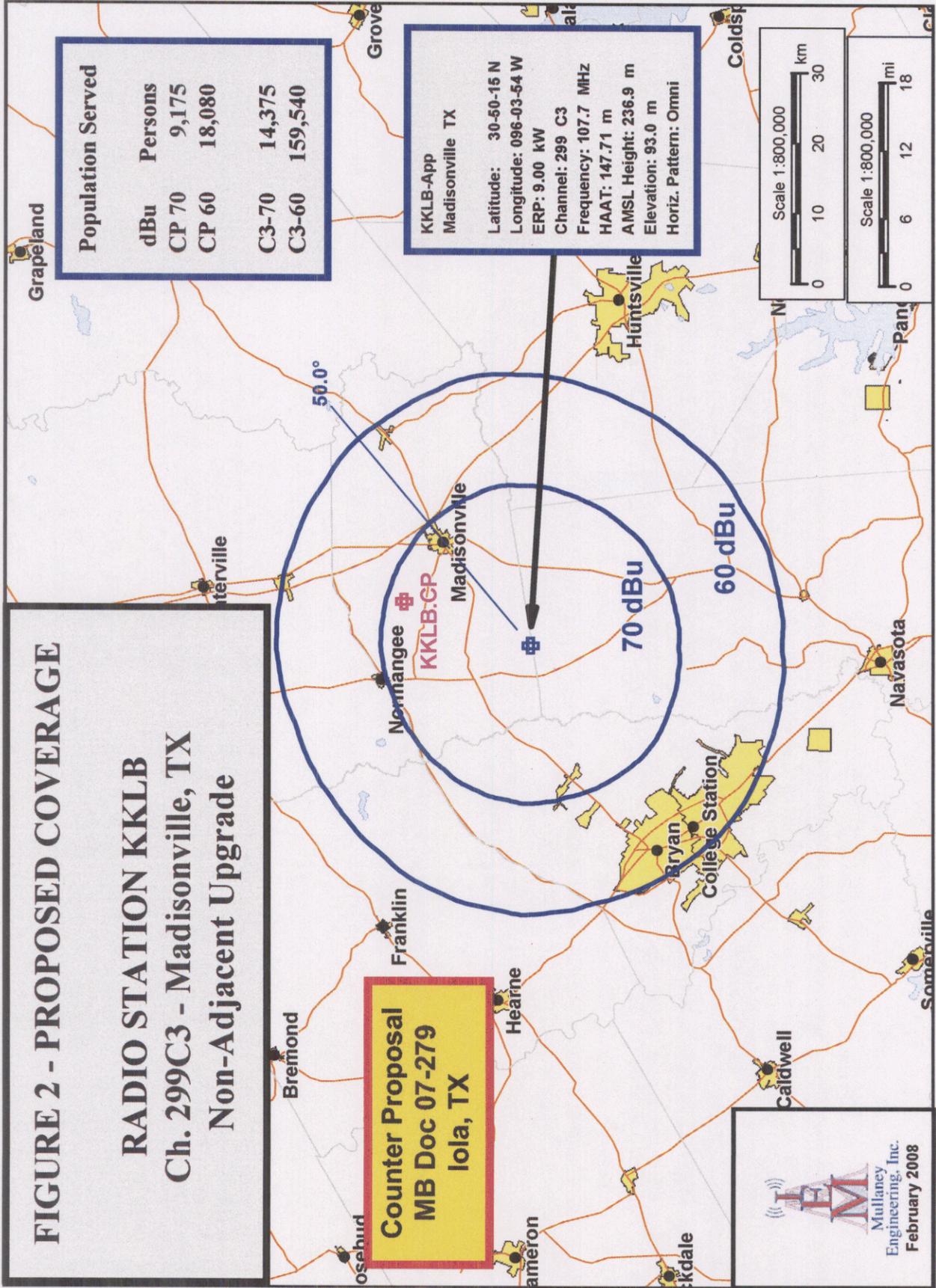
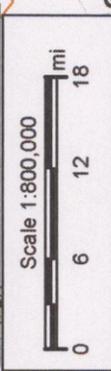
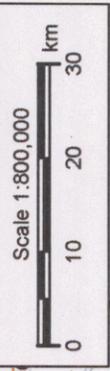
RADIO STATION KKLB Ch. 29.9C3 - Madisonville, TX Non-Adjacent Upgrade

Counter Proposal
MB Doc 07-279
Iola, TX

Population Served	
dBu	Persons
CP 70	9,175
CP 60	18,080
C3-70	14,375
C3-60	159,540

KKLB-App
Madisonville TX

Latitude: 30-50-15 N
Longitude: 096-03-54 W
ERP: 9.00 kW
Channel: 299 C3
Frequency: 107.7 MHz
HAAT: 147.71 m
AMSL Height: 236.9 m
Elevation: 93.0 m
Horiz. Pattern: Omni



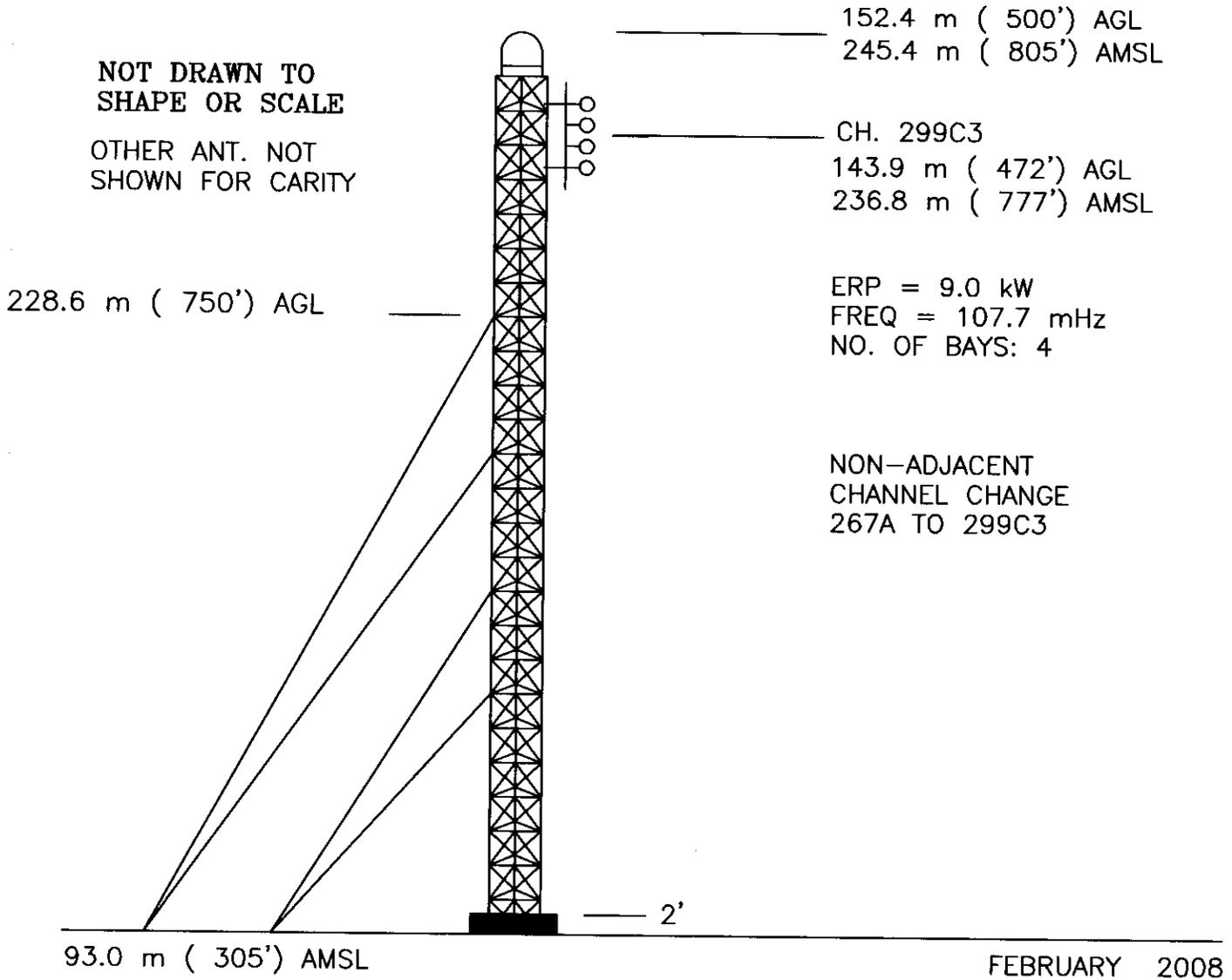
PAINTING AND LIGHTING IN ACCORDANCE
WITH F.A.A. SPECIFICATIONS

N. LAT.: 30° 50' 15.0" NAD 1927
W. LON.: 96° 03' 54.0"

N. LAT.: 30° 50' 15.7" NAD 1983
W. LON.: 96° 03' 54.8"

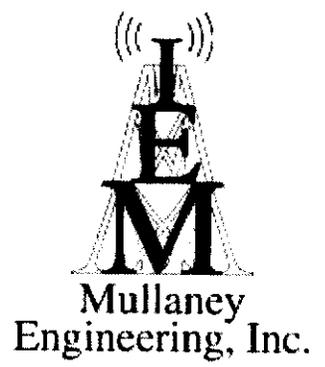
F.A.A.: 2008-ASW-1275-OE
ASRN: PENDING

DUAL: RED & MEDIUM WHITE LIGHTS



MULLANEY ENGINEERING, INC.
GAITHERSBURG, MARYLAND

FIGURE 3
VERTICAL TOWER SKETCH
RADIO STATION KKLB (FM)
MADISONVILLE, TX
CH. 299C3 9.0 kW 148 m HAAT



CH 299 C3 107.7 MHz

Current Spacings to 3rd Adj.

Katherine Pyeatt

February 2008



Data Date:02-07-08 Job Date:02-08-08

Call	CH#	Type	Location	Azi	D-KM	FCC	Margin	
Mad-A	299C3	ADD	Madisonville	TX	0.0	0.00	152.5	
Mad-RM	299C3	ADD	Madisonville	TX	351.4	6.54	152.5	-
RADD	299A	ADD	Iola	TX	206.8	19.77	141.5	-121.73 MX
KQQK	300C	LIC N	Beaumont	TX	121.7	171.93	175.5	-3.57 73.215
KINV	299C3	LIC N	Georgetown	TX	261.4	152.94	152.5	0.44
KTBB	299C3	LIC N	Nacogdoches	TX	57.7	156.32	152.5	3.82
KTBB.C	299C3	CP N	Nacogdoches	TX	57.7	156.81	152.5	4.31
KTBB	299C3	PSV	Nacogdoches	TX	56.3	161.48	152.5	8.98

FIGURE 4-A - FM CHANNEL STUDY Proposed Site - 299C3



Mullaney
Engineering, Inc.

RADIO STATION KKLB
Ch. 299C3 - Madisonville, TX
Non-Adjacent Upgrade
February 2008

FIGURE 5 - CONTOUR PROTECTION

Section 73.215

RADIO STATION KKLB

Ch. 299C3 - Madisonville, TX

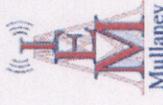
Non-Adjacent Upgrade

Counter Proposal
MB Doc 07-279
lola, TX

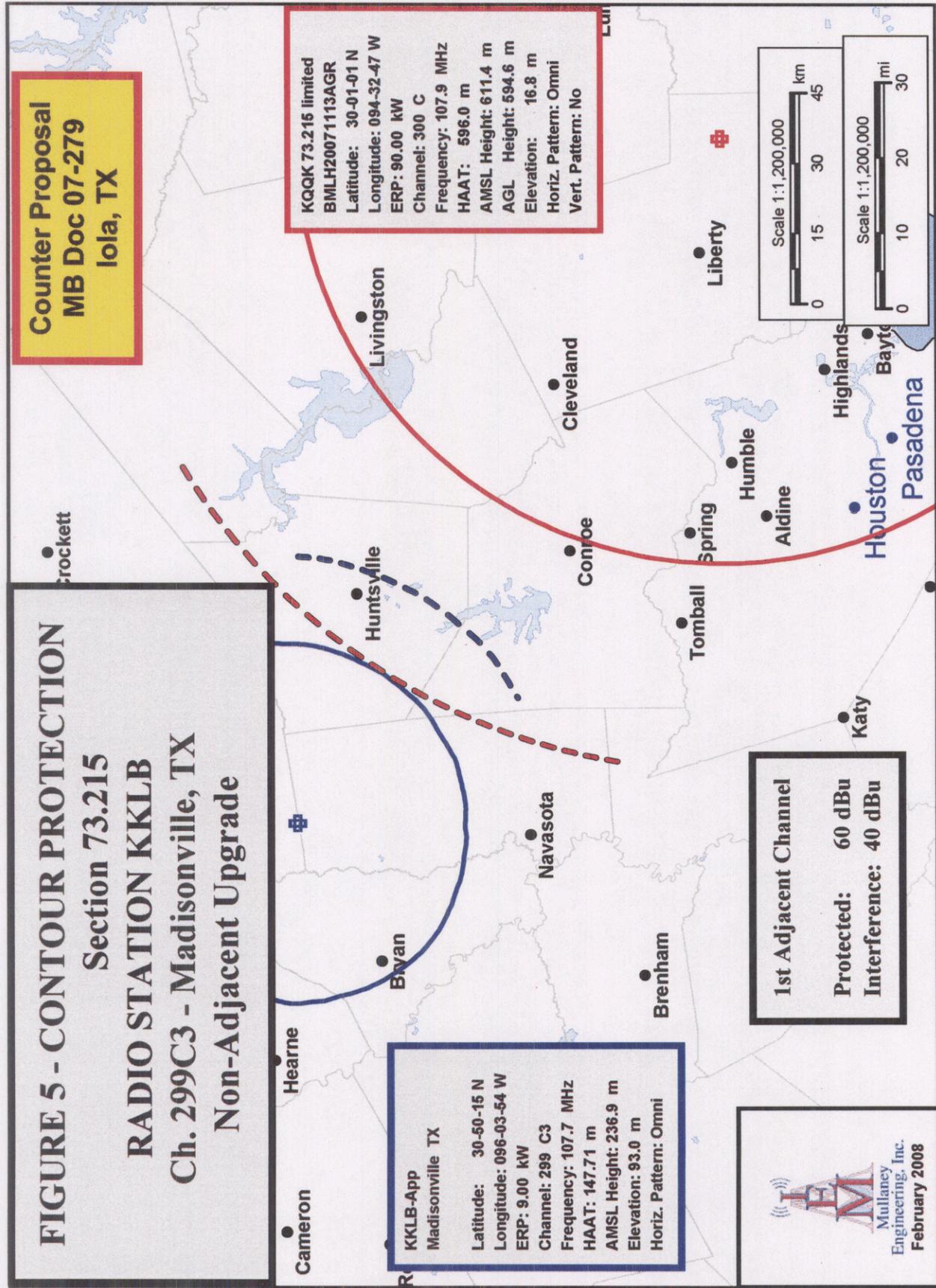
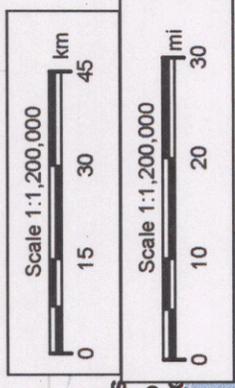
KQQK 73.215 limited
BMLH20071113AGR
Latitude: 30-01-01 N
Longitude: 094-32-47 W
ERP: 90.00 kW
Channel: 300 C
Frequency: 107.9 MHz
HAAT: 596.0 m
AMSL Height: 611.4 m
AGL Height: 594.6 m
Elevation: 16.8 m
Horiz. Pattern: Omni
Vert. Pattern: No

KKLB-App
Madisonville TX
Latitude: 30-50-15 N
Longitude: 096-03-54 W
ERP: 9.00 kW
Channel: 299 C3
Frequency: 107.7 MHz
HAAT: 147.71 m
AMSL Height: 236.9 m
Elevation: 93.0 m
Horiz. Pattern: Omni

1st Adjacent Channel
Protected: 60 dBu
Interference: 40 dBu



Mullancy
Engineering, Inc.
February 2008

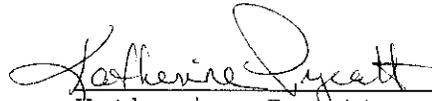


CERTIFICATE OF SERVICE

I, Katherine Pyeatt, do hereby certify that copies of the foregoing Counterproposal have been served by United States mail, postage prepaid this 11th day of February, 2008, upon the following:

Ms Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Charles Crawford
4553 Bordeaux Ave.
Dallas, Texas 75205


Katherine Pyeatt