

APRIL 1, 2013

EX PARTE E-MAIL MESSAGE

TO FCC COMMISSIONER JESSICA ROSENWORCEL

AND TWO MEMBERS OF HER STAFF:

ALEX HOEHN-SARIC

AND MARQUITA BOOZER

FROM DON SCHELLHARDT, ESQUIRE

FROM: Don Schellhardt <djlaw@gmail.com>

6:23 PM (2 hours ago)

TO: Jessica.Rosenworcel (Jessica.Rosenworcel@fcc.gov)

CC: Alex.Hoehn-Saric (Alex.Hoehn-Saric@fcc.gov), Marquita Bpozer (Marquita.Boozer@fcc.gov), Nickolaus Leggett (leggett3@gmail.com), Tracy Rosenberg (Tracy@media-alliance.org)

Dear Commissioner Rosenworcel,

My name is Don Schellhardt. As you might recall, I am the attorney for LET THE CITIES IN!!: the recently formed citizen's advocacy group which filed a Petition For Reconsideration, in FCC Docket 99-25, to allow licensing of LPFM radio stations below 50 watts in urban areas. I am also the Co-Founder of, and current President of, THE AMHERST ALLIANCE: an older citizen's advocacy group which has stood behind Low Power FM since 1998.

In addition, back in 1997, I joined my friend and colleague Nikolaus Leggett to write and file the Petition For Rulemaking which triggered the FCC's first deliberations on establishing a Low Power FM Radio Service.

At the outset, please allow me to present you and your staff with a new, "hot off the presses" study by LET THE CITIES IN!! The LTCI will be placed in Docket 99-25 by the end of the day, but you and your staff are receiving it now. The study looks at 285 different communities with a population of at least 100,000. The study's title expresses its conclusion: "It Isn't Just Large Cities That Need LPFM Stations Below 50 Watts."

The study also concludes that the addition of less than 200 stations below 50 watts would be sufficient to guarantee each of the 285 studied cities at least 3 LPFM stations per city.

Beyond sending you a copy of LTCI's new study, I also want to express a more personal perspective on LTCI's Petition For Reconsideration. In doing this, I decided to contact you because you are a graduate of Wesleyan University. I am also a graduate of "Wes Tech" (Class of 1971) and so is my longtime fellow activist, Nick Leggett (Class of 1968).

I may be falling prey to pure mythology, but it has been my experience that the average Wesleyan graduate is above average in idealism, innovation and open-mindedness. I believe this is true of both Nick Leggett and myself. I hope it is true of you as well.

So here are the personal perspectives I want to share:

(1.) The people in LTCl, including me, are trying to be flexible. The new LTCl study is proof of this. Our Petition advocates licensing of LPFM stations below 50 watts in the "urban core" areas of the Top 100 Arbitron Markets. Our new study, however, examines one variant of an alternative approach proposed by a different LPFM advocacy group, THE MEDIA ALLIANCE of California. That is: The study explores allowing LPFM stations below 50 watts -- in each of the 285 communities with a population above 100,000 -- TO THE EXTENT THAT THIS MIGHT BE NECESSARY to guarantee each city a minimum of 3 LPFM stations per city.

In short:

Members of LTCl and related groups will bend, to a reasonable extent, for the sake of resolving the current issues. Most of the people in our ranks want to move on to an exclusive focus on getting licensed in the coming LPFM filing window.

As for myself, personally, I have dedicated 15 years of my life to nurturing LPFM and I am ready to tackle some new challenges. I don't plan to retire to a rocking chair: indeed, I hope to die on my feet, giving an impassioned speech for a cause I believe in. I would, however, like to spend the next 15 years working on something besides LPFM.

So please consider LTCl flexible. We do NOT want to keep on fighting if we can avoid it.

(2.) At the same time, please realize that we cannot be INFINITELY flexible -- because personal loyalties, and deep emotions, are involved. Early union organizers used to sing: "Solidarity forever!" Today, military people talk of "leaving no one behind". It's the same principle.

And WE believe in it.

Most of us in LTCl either live in "shut out" areas ourselves or know people, including fellow activists, who live in such areas.

Those of us like me -- who are not "shut out" in our own communities -- can bend in our negotiations on behalf of people who are. However, we cannot bring ourselves to simply "write off" those people completely. The people we are trying to help, and protect, are friends ... family ... even comrades-in-arms.

To cite one personal example, consider my home State of New Jersey. I was born and raised there, but I left it long ago and I have no desire to return. Yet I feel anger when I reflect that there is not a single community over 100,000 in the entire State -- not Newark, not Jersey City, not Paterson, not Elizabeth -- where even one LPFM station can be licensed under the FCC's "LP100s only" policy. My hometown of Livingston (population 28,000) can't be home to an LPFM station, either, although it could accommodate 2 stations below 50 watts.

Metaphorically, the FCC's "LP100s only" policy has laid waste to the entire State of New Jersey. Even those who care nothing about the morality of this policy should ponder the political sustainability of taking so much from so many.

Don't ask advocates like me to accept a "resolution" which leaves people and places we care about with nothing. However, give us an HONORABLE resolution of the current issues and we will work within that resolution respectfully.

(3.) Finally, if we DO have to keep on fighting, please be aware that we have ammunition we have not fired.

It has been LTCl's "working hypothesis" that the Media Bureau has been "wagging the dog". We still do not understand the Bureau's motives, but we do understand their actions.

We believe that the Commissioners, when they adopted the current LPFM regulations, had been under-informed about the negative consequences of the rigidly uniform "LP100s only" policy. Since then, we have been hoping that the Commissioners will "clean up the mess" once they realize how many tens of millions of people will be hurt by a continued commitment to harmful and unnecessary uniformity.

Given our hope, we have endeavored to present our case with restraint.

Yes, we have asked the Commission some embarrassing questions. For example: How can the racially discriminatory effects of the "LP100s only" policy be reconciled with the Equal Protection Clause of the U.S. Constitution? And why does the Commission view 10 watt stations as "not technically viable" and "spectrally inefficient" when they are operated by Low Power FM broadcasters -- while routinely licensing the very same 10 watt stations when they are operated by translator broadcasting chains or, on the AM Band, by Travelers' Information Services?

Yes, we have asked embarrassing questions, but we have asked them in Docket 99-25 filings and in the trade press.

We have kept the debates relatively contained, in the hope that the Commissioners will in time resolve the issues honorably. We have not called in the Justice Department. We have not asked the FCC Inspector General to investigate suspicious behavior by the Media Bureau. We have not contacted Governor Christie of New Jersey, or Mayor Bloomberg of New York City, or Governor Brown of California. We have not contacted the original co-sponsors of the Local Community Radio Act. We have not placed phone calls to Rachel Maddow or Tavis Smiley or Oprah Winfrey.

Please prove to us that we were right to give the Commissioners a chance to "clean up this mess" on their own.

As I said at the outset, LTCI Members don't want to keep on fighting and I don't want to keep on fighting, either. I have "bigger fish to fry".

At the same time, personal loyalties will not allow some of us to leave the battlefield without gaining SOME kind of meaningful relief for people and places we love. To date, unfortunately, we have seen only "stonewalling" by the FCC: a posture of TOTAL inflexibility on imposing the LP100 "norm", even as translators and TIS stations are routinely allowed to transmit at 10 watts.

There has to be flexibility on BOTH sides if we are going to resolve these issues and avoid even more conflict.

Thank you, Commissioner Rosenworcel, for considering what I have to say.

Respectfully,

Don Schellhardt, Esquire

djlaw@gmail.com

(203) 982-5584

3250 East Main Street

#48

Waterbury, CT 06705

**IT ISN'T JUST THE LARGEST CITIES
THAT NEED LPFM STATIONS BELOW 50 WATTS**

A Study Prepared For
LET THE CITIES IN!!

By DON SCHELLHARDT, ESQUIRE

Attorney for LET THE CITIES IN!!

djlaw@gmail.com

(203) 982-5584

3250 East Main Street

#48

Waterbury, CT 06705

April 1, 2013

LET THE CITIES IN!! (LTCI) is a newly formed citizens' advocacy group. We call for expanding the FCC's recent expansion of the Low Power FM (LPFM) Radio Service, under the Local Community Radio Act, so that all of America's urban areas share in the expansion.

LTCI has filed a Petition For Reconsideration in FCC Docket 99-25, the LPFM Docket. The Petition urges the Federal Communications Commission to modify its current policy of licensing only LP100 stations (50-100 watts) in urban areas. Instead, the Petition asks the FCC to allow radio stations below 50 watts, including LP10 stations (1-10 watts), in the "urban core" areas of the Top 100 Arbitron Markets.

It is widely believed, in much of the LPFM community, that relief from the "LP100s only" policy is largely needed in a handful of large cities with exceptionally high population density (correlated with extreme spectrum scarcity). However, recent research by LET THE CITIES IN!! indicates that this belief is mostly "an urban legend".

LTCI analyzed data for *285 different incorporated cities* with a population which exceeds 100,000. New York City -- #1 in population rank -- faces spectrum scarcity so severe that it will have no LPFM stations at all under current policies. However, the same can also be said of Rialto, California: #283 in population rank.

Indeed, as one moves from the 50 largest U.S. cities down to those cities which rank below #200, a pattern emerges with remarkable consistency. *Roughly 1 city in 3* will be limited to 2 LPFM stations or less -- unless the "LP100s policy" is changed. However, *if one LPFM station below 50 watts is added to the mix for roughly every 8 stations above 50 watts*, each of the 285 cities can have at least 3 LPFM stations.

Roughly half of the nation's "shutout cities" -- with 2 LPFM stations or less -- are found in California. Other clusters of exclusion include places within 100 miles of New York City ... Southern New England, outside of metropolitan New York ... the Baltimore/Washington corridor ... the eastern Great Lakes region (from Buffalo, through Michigan and Ohio, into Illinois) ... plus parts of Texas, Utah and Colorado..

The LP100 frequencies projected for each of the 283 cities were derived from Michelle Eyre's "My LPFM Channel Search Tool" on the REC NETWORKS Web Site (www.recnet.com). The individual frequencies often carry cautionary notes, including "You may receive interference from others" or "Grid translator dismissal assumed".

TABLE I.
 NUMBER OF ADDITIONAL LPFM STATIONS (BELOW 50 WATTS)
 NEEDED UNDER TWO SCENARIOS

2-STATION GUARANTEE:

*LPFM stations below 50 watts are permitted **to the extent necessary** to guarantee at least 2 LPFM stations for each city.*

3-STATION GUARANTEE:

*LPFM stations below 50 watts are permitted **to the extent necessary** to guarantee at least 3 LPFM stations for each city.*

Total Number of <u>LP100s Available</u>	Extra Stations Needed To <u>Meet 2-Station Guarantee</u>	Extra Stations Needed To <u>Meet 3-Station Guarantee</u>
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	50 LARGEST INCORPORATED U.S. CITIES	
246	+13	+30
	100 LARGEST INCORPORATED U.S. CITIES	
519	+28	+57
	285 LARGEST INCORPORATED U.S. CITIES	
1,546	+96	+193

TABLE II.
INCORPORATED CITIES WITH NO LPFM STATIONS AT ALL

(Population rank in parentheses)

Among the 50 largest U.S. cities:

- (1) New York City
- (10) San Jose
- (18) Detroit

Among the next 50 largest U.S. cities:

- (59) Riverside, CA
- (61) Pittsburgh
- (67) Toledo
- (68) Newark, NJ
- (72) Buffalo
- (75) Jersey City
- (97) San Bernardino

*Among the remaining 185 U.S. cities
with a population exceeding 100,000:*

- (114) Moreno Valley, CA
- (115) Yonkers, NY
- (139) Santa Rosa, CA
- (163) Fort Collins, CO
- (166) Paterson, NJ
- (169) Bridgeport, CT
- (171) Lakewood, CO
- (186) Warren, MI
- (199) Elizabeth, NJ
- (206) Stamford, CT
- (216) Allentown, PA
- (223) Denton, TX
- (225) Vallejo, CA
- (227) Provo, UT
- (229) Ann Arbor
- (233) Berkeley
- (258) Cambridge, MA
- (264) Richmond, CA
- (283) Rialto, CA

TABLE III.
INCORPORATED CITIES WITH ONLY ONE LPFM STATION

(Population rank in parentheses)

Among the 50 largest U.S. cities:

- (8) San Diego
- (21) Baltimore
- (22) Boston
- (26) Denver
- (31) Oklahoma City
- (34) Fresno
- (48) Oakland

Among the next 50 largest U.S. cities:

- (76) Chula Vista, CA
- (95) Fremont, CA
- (96) Irvine, CA

*Among the remaining 185 U.S. cities
with a population exceeding 100,000:*

- (112) Fontana, CA
- (121) Glendale, CA
- (127) Worcester
- (132) Providence
- (141) Rancho Cucamonga, CA
- (142) Ontario, CA
- (153) Salem, OR
- (154) Corona, CA
- (161) Pomona, CA
- (162) Joliet, IL
- (167) Hayward, CA
- (170) Syracuse
- (174) Naperville, IL
- (176) Sunnyvale, CA
- (177) Dayton
- (181) Pasadena, CA
- (191) Sterling Heights, MI
- (192) New Haven
- (194) Thousand Oaks, CA

- (200) Simi Valley, CA
- (209) Carrollton, TX
- (218) Santa Clara, CA
- (221) Victorville, CA
- (230) Lansing, MI
- (231) El Monte, CA
- (235) Downey, CA
- (236) Costa Mesa, CA
- (243) Elgin, IL
- (255) West Covina, CA
- (256) Norwalk, CA
- (257) Fairfield, CA
- (267) Burbank, CA
- (270) Palm Beach
- (278) Flint, MI

TABLE IV.
INCORPORATED CITIES WITH ONLY TWO LPFM STATIONS

(Population rank in parentheses)

Among the 50 largest U.S. cities:

- (2) Los Angeles
- (3) Chicago
- (13) San Francisco
- (19) El Paso
- (24) Washington, DC
- (36) Long Beach
- (50) Arlington, TX

Among the next 50 largest U.S. cities:

- (54) Anaheim, CA
- (57) Santa Ana, CA
- (63) Stockton, CA
- (80) Laredo, TX
- (86) Garland, TX
- (93) Irving, TX

*Among the remaining 185 U.S. cities
with a population exceeding 100,000:*

- (111) Aurora, IL
- (122) Huntington Beach, CA'
- (136) Garden Grove, CA
- (147) Lancaster, CA
- (157) Springfield, MA
- (172) Alexandria, VA
- (180) Orange, CA
- (188) West Valley City, UT
- (205) Concord, CA
- (248) Lowell, MA
- (250) Arvada, CO
- (262) West Jordan, UT
- (268) Antioch, CA
- (276) Richardson, TX
- (281) El Cajon, CA
- (284) Santa Maria, CA

RAW DATA:

**PROJECTED NUMBER OF LP100s
IN 285 INCORPORATED CITIES**

(Ranked by population)

1. **New York City, 0**
2. **Los Angeles, 2**
3. **Chicago, 2**
4. Houston, 13
5. Philadelphia, 3
6. Phoenix, 11
7. San Antonio, 8
8. **San Diego, 1**
9. Dallas, 3
10. **San Jose, 0**
11. Jacksonville, 14
12. Indianapolis, 6
13. **San Francisco, 2**
14. Austin, 8

15. Columbus, OH, 4
16. Fort Worth, 5
17. Charlotte, 3
18. **Detroit, 0**
19. **El Paso, 2**
20. Memphis, 9
21. **Baltimore, 1**
22. **Boston, 1**
23. Seattle, 9
24. **Washington, DC, 2**
25. Nashville-Davidson, 3
26. **Denver, 1**
27. Louisville-Jefferson County, 6
28. Milwaukee, 4
29. Portland, OR, 7
30. Las Vegas, 7
31. **Oklahoma City, 1**
32. Albuquerque, 7
33. Tucson, 4
34. **Fresno, 1**
35. Sacramento, 6
36. **Long Beach, 2**

37. Kansas City, MO, 8
38. Mesa, AZ, 7
39. Virginia Beach, 6
40. Atlanta, 4
41. Colorado Springs, 5
42. Omaha, 13
43. Raleigh, 4
44. Miami, 11
45. Cleveland, 5
46. Minneapolis, 6
47. Tulsa, 6
48. **Oakland, 1**
49. Wichita, 12
50. **Arlington, TX, 2**
51. New Orleans, 11
52. Bakersfield, 5
53. Tampa, 15
54. **Anaheim, 2**
55. Honolulu, 9
56. Aurora, CO, 4
57. **Santa Ana, CA, 2**
58. Saint Louis, 14

59. **Riverside, CA, 0**
60. Corpus Christi, 12
61. **Pittsburgh, 0**
62. Lexington-Fayette, KY, 7
63. **Stockton, CA, 2**
64. Cincinnati, 4
65. Anchorage, 4
66. Saint Paul, 7
67. **Toledo, 0**
68. **Newark, NJ, 0**
69. Greensboro, NC, 6
70. Plano, TX, 3
71. Lincoln, NB, 9
72. **Buffalo, 0**
73. Henderson, NV, 5
74. Fort Wayne, 8
75. **Jersey City, 0**
76. **Chula Vista, CA, 1**
77. Saint Petersburg, 17
78. Orlando, 5
79. Norfolk, 5
80. **Laredo, TX, 2**

81. Chandler, AZ, 10
82. Madison, WI, 9
83. Lubbock, TX, 9
84. Durham, 5
85. Winston-Salem, 5
86. **Garland, TX, 2**
87. Glendale, AZ, 5
88. Baton Rouge, 7
89. Hialeah, FL, 11
90. Reno, 3
91. Chesapeake, VA, 5
92. Scottsdale, AZ, 6
93. **Irving, TX, 2**
94. North Las Vegas, 6
95. **Fremont, CA, 1**
96. **Irvine, CA, 1**
97. **San Bernardino, 0**
98. Birmingham, AL, 3
99. Gilbert, AZ, 9
100. Rochester, 11
101. Boise (City), 7
102. Spokane, 12

- 103. Montgomery, AL, 8
- 104. Des Moines, 6
- 105. Richmond, 6
- 106. Fayetteville, NC, 10
- 107. Modesto, 5
- 108. Shreveport, 15
- 109. Tacoma, 10
- 110. Oxnard, CA, 5
- 111. **Aurora, IL, 2**
- 112. **Fontana, CA, 1**
- 113. Akron, 3
- 114. **Moreno Valley, CA, 0**
- 115. **Yonkers, NY, 0**
- 116. Augusta-Richmond County, 11
- 117. Little Rock, 8
- 118. Mobile, 6
- 119. Columbus, GA, 9
- 120. Amarillo, 13
- 121. **Glendale, CA, 1**
- 122. **Huntington Beach, CA, 2**
- 123. Salt Lake City, 3
- 124. Grand Rapids, MI, 4

- 125. Tallahassee, 4
- 126. Huntsville, AL, 14
- 127. **Worcester, 1**
- 128. Knoxville, 6
- 129. Newport News, 5
- 130. Grand Prairie, TX, 3
- 131. Brownsville, TX, 7
- 132. **Providence, 1Port**
- 133. Santa Clarita, CA, 4
- 134. Overland Park, KS, 7
- 135. Jackson, MS, 7
- 136. **Garden Grove, CA, 2**
- 137. Chattanooga, 5
- 138. Oceanside, CA, 12
- 139. **Santa Rosa, CA, 0**
- 140. Fort Lauderdale, 6
- 141. **Rancho Cucamonga, CA, 1**
- 142. **Ontario, CA, 1**
- 143. Port Saint Lucie, FL, 6
- 144. Vancouver, WA, 8
- 145. Tempe, AZ, 8
- 146. Springfield, MO, 15

- 147. **Lancaster, CA, 2**
- 148. Pembroke Pines, FL
- 149. Cape Coral, FL, 8
- 150. Eugene, OR, 14
- 151. Peoria, AZ, 7
- 152. Sioux Falls, SD, 10
- 153. **Salem, OR, 1**
- 154. **Corona, CA, 1**
- 155. Elk Grove, CA, 10
- 156. Palmdale, CA, 3
- 157. **Springfield, MA, 2**
- 158. Salinas, CA, 3
- 159. Pasadena, TX, 11
- 160. Rockford, IL, 5
- 161. **Pomona, CA, 1**
- 162. **Joliet, IL, 1**
- 163. **Fort Collins, CO, 0**
- 164. Torrance, CA, 3
- 165. Kansas City, KS, 9
- 166. **Paterson, NJ, 0**
- 167. **Hayward, CA, 1**
- 168. Escondido, CA, 5

- 169. **Bridgeport, CT, 0**
- 170. **Syracuse, 1**
- 171. **Lakewood, CO, 0**
- 172. **Alexandria, VA, 2**
- 173. Hollywood, FL, 11
- 174. **Naperville, IL, 1**
- 175. Mesquite, TX
- 176. **Sunnyvale, CA, 1**
- 177. **Dayton, 1**
- 178. Cary, NC, 3
- 179. Savannah, 16
- 180. **Orange, CA, 2**
- 181. **Pasadena, CA, 1**
- 182. Fullerton, CA, 3
- 183. Hampton, VA, 6
- 184. Clarksville, TN, 13
- 185. McKinney, TX, 3
- 186. **Warren, MI, 0**
- 187. McAllen, TX, 5
- 188. **West Valley City, UT, 2**
- 189. Columbia, SC, 16
- 190. Killeen, TX, 10
- 191. **Sterling Heights, MI, 1**

- 192. **New Haven, 1**
- 193. Topeka, KS
- 194. **Thousand Oaks, CA, 1**
- 195. Olathe, KS, 8
- 196. Cedar Rapids, IA, 23
- 197. Waco, TX, 7
- 198. Visalia, CA, 4
- 199. **Elizabeth, NJ, 0**
- 200. **Simi Valley, CA, 1**
- 201. Gainesville, FL, 5
- 202. Hartford, 4
- 203. Bellevue, WA, 11
- 204. Miramar, FL, 12
- 205. **Concord, CA, 2**
- 206. **Stamford, CT, 0**
- 207. Coral Springs, FL, 4
- 208. Charleston, SC,.18
- 209. **Carrollton, TX, 1**
- 210. Lafayette, LA, 10
- 211. Roseville, CA, 7
- 212. Thornton, CO, 6
- 213. Frisco, TX. 3

- 214. Kent, WA, 7
- 215. Surprise, AZ, 8
- 216. **Allentown, PA, 0**
- 217. Beaumont, TX, 17
- 218. **Santa Clarita, CA, 1**
- 219. Abilene, 17
- 220. Evansville, IN, 4
- 221. **Victorville, CA,. 1**
- 222. Independence, MO, 12
- 223. **Denton, TX, 0**
- 224. Springfield, IL, 11
- 225. **Vallejo, CA, 0**
- 226. Athens, GA, 5
- 227. **Provo, UT, 0**
- 228. Peoria, IL. 10
- 229. **Ann Arbor, 0**
- 230. **Lansing, MI, 1**
- 231. **El Monte, CA, 1**
- 232. Midland, TX, 17
- 233. **Berkeley, 0**
- 234. Norman, OK, 11
- 235. **Downey, CA, 1**

- 236. **Costa Mesa, CA, 1**
- 237. Murfreesboro, TN, 12
- 238. Inglewood, CA, 3
- 239. Columbia, MO, 4
- 240. Waterbury, CT, 8
- 241. Manchester, NH, 5
- 242. Miami Gardens, FL, 12
- 243. **Elgin, IL, 1**
- 244. Wilmington, NC, 22
- 245. Westminster, CO, 4
- 246. Rochester, MN, 7
- 247. Clearwater, FL, 21
- 248. **Lowell, MA, 2**
- 249. Pueblo, 6
- 250. **Arvada, CO, 2**
- 251. Ventura (aka San Buenaventura), CA, 5
- 252. Gresham, OR, 9
- 253. Fargo, 20
- 254. Carlsbad, CA, 9
- 255. **West Covina, CA, 1**
- 256. **Norwalk, CA, 1**
- 257. **Fairfield, CA**

- 258. **Cambridge, MA, 0**
- 259. Murrieta, CA, 3
- 260. Green Bay, 5
- 261. High Point, NC, 12
- 262. **West Jordan, UT, 2**
- 263. Billings, MT, 21
- 264. **Richmond, CA, 0**
- 265. Round Rock, TX, 9
- 266. Everett, WA, 8
- 267. **Burbank, CA, 1**
- 268. **Antioch, CA, 2**
- 269. Wichita Falls, TX
- 270. **Palm Beach, 1**
- 271. Centennial, CO, 5
- 272. Temecula, CA
- 273. Daly City, CA, 3
- 274. Odessa, TX, 14
- 275. Erie, 8
- 276. **Richardson, TX, 2**
- 277. Pompano Beach, FL, 5
- 278. **Flint, MI, 1**
- 279. South Bend, 5
- 280. West Palm Beach. 3

- 281. **El Cajon, CA, 2**
- 282. Davenport, IA, 14
- 283. **Rialto, CA, 0**
- 284. **Santa Maria, CA, 2**
- 285. Broken Arrow, OK, 10