

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

In the Matter of)	
)	
Request for Extension of Initial Construction Requirements)	WT Docket No. 12-332
)	
Service Rules for the 698, 746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	

**AT&T’s Request for Six Month Extension
Of Interim Construction Benchmark
For Recently-Acquired 700 MHz B Block Licenses**

Pursuant to 47 C.F.R. §§ 1.946, 1.925, and 1.3, AT&T Inc., on behalf of its operating subsidiaries, hereby requests a six-month extension of the interim construction deadlines in 47 C.F.R. § 27.14(g) for certain Lower 700 MHz licenses AT&T acquired or will acquire after April 10, 2012.

INTRODUCTION AND SUMMARY

The Wireless Telecommunications Bureau recently issued a Public Notice granting a blanket six-month extension of the Lower 700 MHz B Block interim construction deadline, which requires a licensee to achieve coverage and service to 35 percent of the geographic area of the license by June 13, 2013.¹ The Bureau excluded AT&T from this blanket extension and further specified that the extensions granted to other licensees are “non-transferrable.”² The

¹ FCC, Public Notice, *Wireless Telecommunications Bureau Extends 700 MHz B Block Licensee Interim Construction Benchmark Deadline Until December 13, 2013*, DA 13-680 (rel. Apr. 10, 2013) (“*B Block Extension Notice*”); see also 47 C.F.R. § 27.14(g) (establishing June 13, 2013 deadline).

² *B Block Extension Notice* at 2 & nn.12 & 13.

Bureau did, however, invite transferees to request similar relief “independently.”³ AT&T now submits its request for a six-month extension of the interim construction deadline for: (i) B Block licenses that AT&T acquired from any licensee that received (or would have received) the extension granted in the B Block Extension Notice and for which the transfer was not fully consummated until after April 10, 2012, and (ii) any other B Block license that AT&T may acquire prior to December 13, 2013 from any such licensee (including acquisitions that are currently pending before the Commission).⁴

The Commission may grant an extension under Rule 1.946(e) when the failure to meet the construction deadline is due to “causes beyond [the licensee’s] control.”⁵ Although the rule provides that the mere fact that the prior licensee made no progress toward meeting the deadline is not by itself justification for an extension, for each of the licenses at issue here the Bureau has explicitly excused (or made clear that it would have excused) that inaction until December 13, 2013. Thus, the rule that the transferee and the transferor should generally stand in the same shoes is met here by extending to AT&T the same December 13, 2013 deadline. Indeed, when a former licensee’s failure to construct facilities has been forgiven, it would be inequitable to suddenly treat that failure as unjustified once the license is transferred to another licensee (which, for example, could result in the transferee being deemed subject to an interim

³ *Id.* at 2 (although the extensions that have been granted are “non-transferrable,” any “proposed assignee or transferee seeking Commission approval to acquire a 700 MHz band B Block license subject to the extension granted herein may independently seek relief justifying an extension of the Interim Construction Benchmark Deadline”).

⁴ The B Block licenses that AT&T has acquired since April 10, 2012 (and for which it has not made an interim build filing as of the date of this Request) and those for which it has pending license transfer requests are listed in Appendix A. AT&T does not request an extension for B Block licenses for which it has filed a 35 percent or more build showing by the original interim construction deadline or for B Block licenses that it seeks to acquire from Verizon Wireless, which was also excluded from the blanket extension granted in the *B Block Extension Notice*.

⁵ 47 C.F.R. § 1.946(e)(1).

construction deadline that has already passed when the transfer is consummated, notwithstanding that the deadline was nearly six months away immediately before the transfer). In addition, other “causes” beyond AT&T’s control have prevented AT&T from meeting the deadlines. In particular, many wireless providers throughout the industry are simultaneously engaged in building Long Term Evolution (“LTE”) networks and otherwise expanding network infrastructure. In this uniquely resource-constrained environment, the extraordinary measures that a licensee might employ to accelerate the build-out of newly acquired licenses cannot be scaled to address AT&T’s construction needs on the many B Block licenses recently acquired (or to be acquired).

Under these unusual circumstances, a brief, six-month extension is in the public interest and will better serve the purposes of the Commission’s rules. AT&T has made extraordinary efforts to build out a nationwide LTE network, and it is committed to constructing facilities in these newly-acquired B Block service areas expeditiously. AT&T has already filed interim build showings for more than 145 B Block licenses, demonstrating the diligence with which it is building out this spectrum. Included in these build showing are many B Block licenses acquired after April 10, 2012, demonstrating the diligence with which AT&T has pursued build-out for even those licenses that it has held for a very limited period of time. Thus, rigid enforcement of the deadlines is not necessary to promote the purposes of the rule, which is to create an incentive for a licensee to use its license to provide service. To the contrary, a brief extension would better promote those purposes, by maintaining an incentive for AT&T to complete the necessary construction in as many of the new license areas as it can by December 13, 2013.

ARGUMENT

The Commission's rules expressly provide that the Commission may extend a wireless license construction deadline "if the licensee shows that failure to meet the construction or coverage deadline is due to involuntary loss of site or other causes beyond its control."⁶ Although the prior license holder's failure to complete construction is not *by itself* grounds for an extension, there are unique circumstances surrounding the B Block licenses that AT&T has (or will) acquire in the last year to justify an extension.

The Commission adopted the interim construction deadlines pursuant to Section 309(j)(4)(B), which provides that the Commission may include performance requirements "to ensure prompt delivery of service to rural areas, to prevent stockpiling or warehousing of spectrum by licensees or permittees, and to promote investment and rapid deployment of new technologies and services."⁷ In other words, the interim construction deadlines are designed to ensure that the winning bidders in an auction actually *use* the spectrum to provide service to consumers rather than "warehousing" the spectrum. There can be no such concerns about AT&T's use of its B Block licenses.

AT&T has made extraordinary efforts to meet the Commission's construction deadlines for hundreds of 700 MHz licenses across the nation. As the Bureau is well aware, reaching the interim construction target for any particular license area requires a wireless provider to complete a very long list of intermediate tasks. For each LTE deployment,⁸ AT&T must engage in network design and planning, acquire cell sites, build or retrofit the necessary cell sites, deploy

⁶ 47 C.F.R. § 1.946(e)(1).

⁷ 47 U.S.C. § 309(j)(4)(B).

⁸ AT&T has deployed LTE service primarily on Lower 700 MHz frequencies, including B Block licenses.

the radios and integrate the cell site with the network, secure the necessary transport for backhaul, and perform network optimization and testing, among many other work items. A typical AT&T LTE cell site deployment requires more than 50 discrete jobs and tasks, many of which must be completed in conjunction with third-party vendors or service providers. This entire cycle of activity can often take well over a year to complete.

AT&T has invested billions of dollars to deploy LTE, and it has made rapid progress. AT&T recently announced that its LTE network already covers over 200 million POPs, and it expects to reach 90 percent of its planned 300 million POP LTE deployment by the end of 2013.⁹ Now that it has deployed an LTE network covering roughly 2 of every 3 Americans, AT&T's remaining efforts largely consist of deploying LTE in more remote and challenging physical environments, which often involves construction in difficult, sparsely populated topography. Even in the face of these challenges, AT&T expects to meet the June 13, 2013 deadline for almost all of the licenses it has held for more than one year.

In order to better serve its customers and provide improved LTE coverage and capacity, AT&T has acquired many additional B Block licenses within the last twelve months. AT&T acquired all of these licenses from entities that were not using the licenses to offer any service and in most cases had not even started construction. Accordingly, to make the June 2013 deadline for these licenses (many of which AT&T has held for only a few months), AT&T would have to complete the entire network design, planning, and construction process in scores of CMAs from start to finish in a matter of months or even weeks.

⁹ Press Release, AT&T Inc., Solid Earnings Per Share and Cash Flow, Strong Mobile Data Growth and Record U-verse Broadband Gains Highlight AT&T's First-Quarter Results (Apr. 23, 2013), *available at* <http://www.att.com/gen/press-room?pid=24091&cdvn=news&newsarticleid=36339&mapcode=corporate|financial>.

AT&T has given priority to Lower 700 MHz B Block licenses in the network planning process. AT&T has redeployed resources within the company (at the expense of other critical business objectives) to support B Block construction, and it has substantially increased the number of third-party crews working on the necessary cell sites (including the use of special incentive programs to provide additional compensation where necessary to attract qualified construction crews). AT&T has increased resources devoted to obtaining zoning approvals and negotiating with other providers for transport. And AT&T has used creative modifications to its normal deployment practices to shorten the overall time to complete the construction.

Due to these extraordinary efforts, AT&T anticipates it will meet the June construction deadline for many of the newly-acquired B Block licenses. For most of the newly-acquired or to-be-acquired licenses, however, causes beyond AT&T's control make it simply impractical to meet the June deadline. A six-month extension for AT&T's newly acquired licenses would thus be fully consistent with the *B Block Extension Notice* and Rule 1.946(e)(1), which provides that strict application of the deadline would be inequitable when, as here, the licensee has been prevented from fully meeting the requirements due to "causes beyond its control."¹⁰ To be sure, Rule 1.946(e)(3) provides that "the Commission will not grant extension requests *solely* to allow a transferee or assignee to complete facilities that the transferor or assignor failed to construct,"¹¹ but that provision is no bar to an extension here for several reasons.

First, with respect to the particular licenses at issue, the Bureau has already either explicitly excused the original license holder's inaction or made clear that it would have excused

¹⁰ 47 C.F.R. § 1.946(e)(1); *see also* 47 C.F.R. § 1.925(b)(3)(ii) (waiver may be granted when "[i]n view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome, or contrary to the public interest, or the applicant has no reasonable alternative").

¹¹ 47 C.F.R. §1.946(e)(3) (emphasis added).

that inaction on a blanket basis.¹² Having excused the prior licensees' inaction, it would make no sense to hold, in effect, that the original licensee's inaction was suddenly and retroactively not excused upon transfer to AT&T – particularly when AT&T is in fact making extraordinary efforts to meet the interim construction deadline for licenses across the nation.¹³ Indeed, fundamental principles of administrative law require the Commission to apply a consistent standard when granting extensions to avoid discriminatory outcomes.¹⁴

An extension would also better serve the purposes of Rule 1.946. The rule is designed to increase the incentive for initial licensees to meet the construction requirements by eliminating any possibility that a licensee could benefit from its inaction and evade the deadlines merely by selling the license to someone else. The new assignee must generally stand in the shoes of the prior licensee; if the prior licensee's failure to construct facilities was unexcused, the new assignee must take the license as is. Here, however, the Bureau has concluded that the public interest is best served by allowing B Block licensees (with a few exceptions) an additional six months to meet the build requirements. Having concluded that the former licensee's inaction for

¹² Although the blanket relief was not granted until April 10, 2013, after AT&T acquired some of the licenses that are the subject of this request, the Bureau would have given those licensees a six-month extension under the reasoning of its *B Block Extension Notice*.

¹³ The most extreme example of this inequitable treatment would be in the case of a license transferred to AT&T after June 13, 2013, but prior to December 13, 2013. The fact that the license remained unbuilt on June 13 would not violate the interim construction deadline (as extended by the blanket relief), but such inaction would suddenly become unjustified if the license is transferred to AT&T on June 14. Even though the original licensee still had five months to complete the interim construction benchmark, the transfer to AT&T would render AT&T instantly in violation of the deadline. For these reasons, AT&T specifically requests that the Bureau make clear that the six-month extension will apply to any B Block licenses AT&T may acquire in the future from licensees that were given or would have been given an extension.

¹⁴ See *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Ne. Cellular Tel. Co., L.P. v. FCC*, 897 F.2d 1164, 1167 (D.C. Cir. 1990); *NetworkIP, LLC v. FCC*, 548 F.3d 116, 127 (D.C. Cir. 2008) (agency must avoid inconsistent standards because they increase the “danger of arbitrariness (or worse)” – “[c]omplainants the agency ‘likes’ can be excused, while ‘difficult’ defendants can find themselves drawing the short straw”).

three to four years was excusable, no purpose would be served by lurching AT&T, which has undertaken diligent efforts to build out, back to a June deadline. To the contrary, an extension would *better* serve the purpose of the rule by maintaining an additional incentive for AT&T to complete the remaining work necessary to meet the interim requirements by December 13, 2013.

In addition, the Commission has held that an extension may be appropriate when the facts establish that the transferee intended to build out the license and did not acquire the license for the purpose of obtaining an extension.¹⁵ Here, AT&T's LTE track record establishes beyond serious doubt that AT&T has been working diligently and expeditiously to build out and provide service over its 700 MHz licenses. Similarly, AT&T did not acquire these licenses with the intent or expectation that the Commission would extend the deadlines, as none of the parties could have known at the time that the Bureau would grant a blanket extension to the broad swath of B Block licensees defined in the *B Block Extension Notice*.¹⁶ AT&T's "diligence and intent in constructing the markets" here justifies a brief six-month extension.¹⁷

Other unique circumstances beyond AT&T's control prevent AT&T from meeting the interim construction deadline for the newly-acquired licenses. Specifically, AT&T is faced with building out a large number of newly-acquired licenses in a very short amount of time, but it is impractical in today's relatively unusual environment to engage a sufficiently large number of

¹⁵ Memorandum Opinion and Order, *Leap Wireless International, Inc., Request for Waiver and Extension of Broadband PCS Construction Requirements*, 16 FCC Rcd. 19573, ¶ 13 (rel. Nov. 9, 2001) ("*Leap Extension Order*").

¹⁶ *Id.* ¶ 13 ("[W]e find no evidence that Leap purchased the licenses with the intent of obtaining an extension, but rather all indications are that Leap intended to construct these markets within the established deadlines. This is evidenced by Leap's site planning, market research, and deployment in the markets it acquired, . . . [and] Leap has accelerated its construction efforts").

¹⁷ *Id.* ("[W]e believe Leap has demonstrated its commitment to providing service and has acted with diligence in attempting to overcome obstacles to construction in a very short timeframe. Leap's diligence and intent in constructing the markets is one factor, among those discussed herein that, in the aggregate, warrant waiver of the construction deadline").

qualified third-party crews (especially tower crews) to meet highly accelerated construction deadlines in so many CMAs at once. Many different wireless broadband providers are also deploying LTE networks (and constructing facilities to “densify” their existing networks) at the same time, and even with AT&T’s incentive and bonus programs to hire and retain tower crews, it has proven to be infeasible for AT&T to retain sufficient resources and meet the deadlines for every one of its newly-acquired B Block licenses. Thus, even if AT&T could commit additional resources to accelerate the pace of its deployment to meet the deadlines under normal conditions, current marketplace realities beyond AT&T’s control make that impossible.¹⁸

Finally, AT&T respectfully requests that the Bureau grant this extension request promptly and on its own motion. The Bureau issued the *B Block Extension Notice* on its own motion, and the Bureau can issue a similar notice expeditiously granting AT&T a similar six-month extension for its recently-acquired B Block licenses without requesting notice and comment. Given that the June and December construction deadlines are fast approaching, the Bureau should expeditiously grant the requested extension, to provide regulatory certainty and to permit AT&T to make any necessary adjustments in its planning so that it can maximize the chance that it can meet the extended deadlines.

¹⁸ In addition, much of the remaining construction is in relatively remote and sparsely populated areas that often present special logistical or engineering challenges. In that regard, it should be emphasized that meeting the Commission’s construction deadlines in these license areas is mostly a question of extending *coverage*; in many of AT&T’s remaining license areas, a substantial majority of the population is concentrated in far less than 35 percent of the *geographic* area of the license, and thus AT&T already offers service (or will soon offer service) to the majority of the customers in most of these license areas.

CONCLUSION

For the foregoing reasons, the Bureau should expeditiously grant AT&T a six-month extension of the interim construction deadline for (i) B Block licenses that AT&T acquired from any licensee that received (or would have received) the extension and for which the acquisition was not fully consummated until after April 10, 2012, and (ii) any other B Block license that AT&T may acquire prior to December 13, 2013 from any such licensee (including acquisitions that are currently pending before the Commission).¹⁹

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¹⁹ Given that Rule 1.946 directly authorizes an extension of the interim construction deadline here, AT&T does not believe that a waiver of Rule 27.14(g) or Rule 1.946 is necessary. Nonetheless, to the extent the Commission determines a waiver is needed, AT&T hereby requests such a waiver. Good cause exists to grant any required waiver because for the same reasons described in this request for extension, strict compliance would frustrate the underlying purpose of the rules, would be inequitable and would be inconsistent with the public interest.

APPENDIX A

Licenses Currently Held by AT&T			
	License Call Sign	License Name	CMA#
1	WQJU657	Erie, PA	130
2	WQIZ584	Johnstown, PA	143
3	WQJU658	New London-Norwich. CT	154
4	WQIZ548	Roanoke, VA	157
5	WQJU659	Lima, OH	158
6	WQJU660	Galveston, TX	170
7	WQIZ550	Lafayette, LA	174
8	WQIZ354	Battle Creek, MI	177
9	WQIZ413	Springfield, OH	180
10	WQIZ564	Terre Haute, IN	185
11	WQIZ565	Champaign-Urbana, IL	196
12	WQKB204	St. Cloud, MN	198
13	WQJX804	St. Cloud, MN	198
14	WQIZ647	St. Cloud, MN	198
15	WQJU662	Steubenville-Weirton, OH	199
16	WQJU663	Pittsfield, MA	213
17	WQJU664	Chico, CA	215
18	WQOL881	Fargo-Moorhead, ND-MN	221
19	WQIZ478	Tuscaloosa, AL	222
20	WQJU665	Mansfield, OH	231
21	WQIZ371	Petersburg, VA	235
22	WQIZ566	Muncie, IN	236
23	WQJU666	Sharon, PA	238
24	WQIZ479	Joplin, MO	239
25	WQIZ552	Ocala, FL	245
26	WQIZ480	Dothan, AL	246
27	WQJZ319	Glens Falls, NY	266
28	WQIZ567	Kankakee, IL	273
29	WQOL882	Grand Forks, ND	276
30	WQIZ481	Columbia, MO	278
31	WQJU667	Bloomington, IN	282
32	WQIZ372	Elmira, NY	284
33	WQIZ579	Rochester, MN	288
34	WQIZ483	La Crosse, WI	290
35	WQIZ484	Pine Bluff, AR	291
36	WQIZ585	Sherman-Denison, TX	292
37	WQOL883	Bismarck, ND	298
38	WQIZ373	Victoria, TX	300
39	WQIZ374	Aurora-Elgin, IL	303
40	WQIZ485	Lamar, AL-3	309

41	WQIZ486	Bibb, AL-4	310
42	WQIZ487	Cleburne, AL-5	311
43	WQIZ488	Butler, AL-7	313
44	WQIZ489	Lee, AL-8	314
45	WQIZ597	AK-2, Bethel	316
46	WQIZ598	AK-3 Haines	317
47	WQIZ490	Marion, AR-2	325
48	WQIZ491	Sharp, AR-3	326
49	WQIZ492	Clay, AR-4	327
50	WQIZ493	Cross, AR-5	328
51	WQIZ494	Cleburne, AR-6	329
52	WQIZ495	Pope, AR-7	330
53	WQIZ496	Franklin, AR-8	331
54	WQIZ497	Garland, AR-10	333
55	WQIZ498	Hempstead, AR-11	334
56	WQIZ499	Ouachita, AR-12	335
57	WQJU668	Alpine, CA-3	338
58	WQJU669	Sierra, CA-10	345
59	WQJU670	El Dorado, CA-11	346
60	WQIZ500	Saguache, CO-7	354
61	WQIZ501	Kiowa, CO-8	355
62	WQIZ385	Costilla, CO-9	356
63	WQJU671	Litchfield, CT-1	357
64	WQJU672	Windham, CT-2	358
65	WQKH486	Putnam, FL-5	364
66	WQIZ586	Dixie, FL-6	365
67	WQIZ414	Florida 7 - Hamilton	366
68	WQIZ415	Florida 8 - Jefferson	367
69	WQIZ416	Florida 9 - Calhoun	368
70	WQIZ417	Georgia 3 - Chattooga	373
71	WQIZ587	Jasper, GA-4	374
72	WQIZ588	Hancock, GA-7	377
73	WQIZ418	Georgia 11 - Toombs	381
74	WQIZ375	GA-14, Worth	384
75	WQIZ635	Elmore, ID-4	391
76	WQIZ568	Montgomery, IL-6	399
77	WQKH495	Huntington, IN-3	405
78	WQIZ569	Warren, IN-5	407
79	WQJU678	Randolph, IN-6	408
80	WQNE644	Kansas 3 - Jewell	430
81	WQNE646	Kansas 4 - Marshall	431
82	WQIZ370	Fulton, KY-1	443
83	WQIZ502	Caldwell, LA-4	457
84	WQIZ554	Iberville, LA-6	459
85	WQIZ503	West Feliciana, LA-7	460

86	WQIZ533	St. James, LA-8	461
87	WQIZ376	LA-9, Plaquemines	462
88	WQIZ377	MA-1, Franklin	470
89	WQJU679	Barnstable, MA-2	471
90	WQIZ504	Alger, MI-2	473
91	WQIZ505	Cheboygan, MI-4	475
92	WQIZ506	Manistee, MI-5	476
93	WQIZ507	Roscommon, MI-6	477
94	WQKH487	Lake, MN-4	485
95	WQIZ508	Benton, MS-2	494
96	WQIZ509	Bolivar, MS-3	495
97	WQIZ510	Yalobusha, MS-4	496
98	WQIZ511	Washington, MS-5	497
99	WQIZ512	Montgomery, MS-6	498
100	WQIZ513	Leake, MS-7	499
101	WQIZ514	Claiborne, MS-8	500
102	WQIZ515	Copiah, MS-9	501
103	WQIZ516	Smith, MS-10	502
104	WQIZ517	Marion, MO-6	509
105	WQIZ518	Barton, MO-14	517
106	WQIZ519	Stone, MO-15	518
107	WQIZ520	Laclede, MO-16	519
108	WQIZ521	Shannon, MO-17	520
109	WQIZ522	Lincoln, MT-1	523
110	WQIZ419	New Jersey 3 - Sussex	552
111	WQIZ420	New York 5 - Otsego	563
112	WQIZ378	NY-6, Columbia	564
113	WQJU680	Williams, OH-1	585
114	WQJU681	Ashtabula, OH-3	587
115	WQJU682	Hancock, OH-5	589
116	WQJU683	Tuscarawas, OH-7	591
117	WQIZ532	Clinton, OH-8	592
118	WQIZ631	Ross, OH-9	593
119	WQJU684	Perry, OH-10	594
120	WQJU685	Columbiana, OH-11	595
121	WQIZ523	Lincoln, OR-4	609
122	WQJU688	Pennsylvania 1 - Crawford	612
123	WQIZ590	McKean, PA-2	613
124	WQIZ591	Potter, PA-3	614
125	WQIZ592	Bradford, PA-4	615
126	WQIZ636	Lawrence, PA-6	617
127	WQIZ577	Jefferson, PA-7	618
128	WQIZ421	Pennsylvania 9 - Greene	620
129	WQIZ622	Huntingdon, PA-11	622
130	WQIZ422	South Carolina 7 - Calhoun	631

131	WQIZ379	TN-8, Johnson	650
132	WQIZ595	Parmer, TX-3	654
133	WQIZ596	Briscoe, TX-4	655
134	WQIZ386	Reeves, TX-13	664
135	WQIZ555	Caroline, VA-12	692
136	WQIZ575	PR-1 Rincon	723

Licenses Pending Acquisition			
	License Call Sign	License Name	CMA#
1	WQJU704	Utica-Rome, NY	115
2	WQJU705	Poughkeepsie, NY	151
3	WQJU706	Jackson, MI	207
4	WQJU701	Yuma, AZ-4	321
5	WQJU702	Graham, AZ-6	323
6	WQJU703	Colfax, NM-2	554
7	WQJU707	Wayne, PA-5	616
8	WQJU708	Lebanon, PA-12	623
9	WQJQ733	Columbus, GA	153
10	WQIZ613	Yuba City, CA	274
11	WQJU675	Kauai, HI-1	385
12	WQJU676	Maui, HI-2	386
13	WQJU677	Hawaii, HI-3	387
14	WQIZ603	Lake of the Woods, MN-2	483
15	WQIZ559	Mercer, OH-4	588
16	WQOL880	Oconee, SC-1	625
17	WQKH494	Mono, CA-6	341
18	WQKH496	Mineral, NV-4	546
19	WQKH497	Converse, WY-5	722