WOMBLE
CARLYLE
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Vincent A Pepper
Direct Dial: (202) 857-4560
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July 28, 2003

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JUL 2 8 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: MB Docket No. 03-120
RM - 10591

Dear Ms. Dortch:

Transmitted herewith on behalf of Ronald C. Meredith, Petitioner in the above-referenced rule making, are an original and four (4) copies of his Reply Comments.

Should any further information be desired in connection with this matter, please communicate with this office.

Sincerely,

Vincent A Pepper

Enclosures

No. of Copies rec'd 0+4
List ABCDE

RECEIVED

JUL 2 8 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MB Docket No. 03-120
Table of Allotments	)	RM – 10591
FM Broadcast Stations	)	
(Lake City and Chattanooga, Tennessee)	)	

To: Assistant Chief, Audio Division
Media Bureau

REPLY COMMENTS

COMES NOW, Ronald C. Meredith ("Petitioner") petitioner in the above-captioned rule making proceeding and by counsel hereby respectfully submits his Reply Comments. In support thereof it is stated as follows:

1. Comments supporting the proposed rule making were timely submitted on behalf of Petitioner and Lewis F. Cosby, III. A Counterproposal was submitted on behalf of JBD Incorporated, the licensee of station WXJB(FM), Harrogate, Tennessee.

2. These Reply Comments are directed to the above-referenced Counterproposal which proposes the allocation of Channel 244A to an area indicated to be Halls Crossroads, Tennessee, which is mutually exclusive with Petitioner's request being considered herein to allocate Channel 244A to Lake City, Tennessee.

3. There is submitted herewith a Technical Statement prepared by Clyde Scott, Jr., EME Communications, the technical consultant for Petitioner. For the reasons stated in the Technical Statement, the JBD Incorporated Counterproposal is not eligible for consideration in this proceeding since, among other problems, the Halls Crossroads Counterproposal does not

achieve the required line of sight from the proposed transmitter site to "Hall Crossroads" because of terrain obstruction. For this reason and for the other shortcomings reflected in the Technical Statement the Counterproposal is not entitled to consideration it this proceeding and therefore Channel 244A should be allocated to Lake City, Tennessee as proposed.

Respectfully submitted

RONALD C. MEREDITH

By: _____

Vincent A Pepper, his attorney
Womble Carlyle Sandridge & Rice, PLLC
1401 Eye Street, NW, Seventh Floor
Washington, D.C. 20005
tel: (202) 467-6900

Dated: July 28, 2003

Reply Comments
MB Docket No. 03-120
RM – 10591

Lake City, Tennessee

Technical Statement

In Docket No. 03-120, JBD, Inc, proposed to delete channel 243A at Harrogate, Tennessee and allot channel 244A to a community in North Knoxville, Tennessee Known as Halls Crossroads. The following technical statement and related exhibits will show fatal flaws in the engineering filed in support of the counterproposal and therefore should not be considered.

It is commonly know that all filings in support of a proposed rulemaking show a proposed site that has clear line of sight from the proposed site to the proposed city of license. The attached exhibits and statement clearly shows the proposal of JDB, Inc. does not meet these requirements set by the Commissions staff.

Halls Crossroads:

Attached as exhibit 2 is a 1:24,000 topographic map the clearly shows no city boundary exist for a Halls Crossroads. The community of Halls Crossroads is not an incorporated city and supplies no city services, therefore, no city boundary. It is believed the city limits Outlined in JBD's exhibit E, Figure 2 are totally bogus. There is no knowing way the engineer could have derived these limits from any known source. The 2000 census city boundary data has no limits for Halls Crossroads because they do not exist. Exhibit 5 clearly shows this to be true. The label "Halls Crossroads" had to manually be placed upon the map shown in this exhibit. It is also clear that JBD's exhibit E, figure 2 does not depict the true 70 dBu contour from the proposed site. It appears the exhibit has only a circle contour and does not take into account any terrain between the proposed site and the Halls Crossroads community.

Exhibits in support:

Offered, as exhibits 1A thru 1K, are path studies from the proposed site to the Halls Crossroads community. Since there are no known city boundaries 10 radials were chosen towards the community. Exhibit 4 is offered to show the radials selected.
To achieve a HAAT of 100 meters, from the proposed site of North latitude 36-09-43, West longitude 083-58-33, a structure to support a COR AGL of 78 meters would be required. All 10 radials show no clear line of sight could be achieved without an over height tower, a showing not to be supported in a proposed rulemaking. Exhibit 3 is a terrain overlay that clearly shows the terrain obstruction. The site was also studied with a HAAT of 125 meters with the same results. 3 second arc data was used to prepare the

attached exhibits but 30 second data showed the same results. The receive antenna was set at a height AGL of 9 meters, the Commissions standard.

Signals within the proposed gain area:

It was noted the engineering offered by JDB failed to show the facilities already offering service to the Halls Crossroads area.

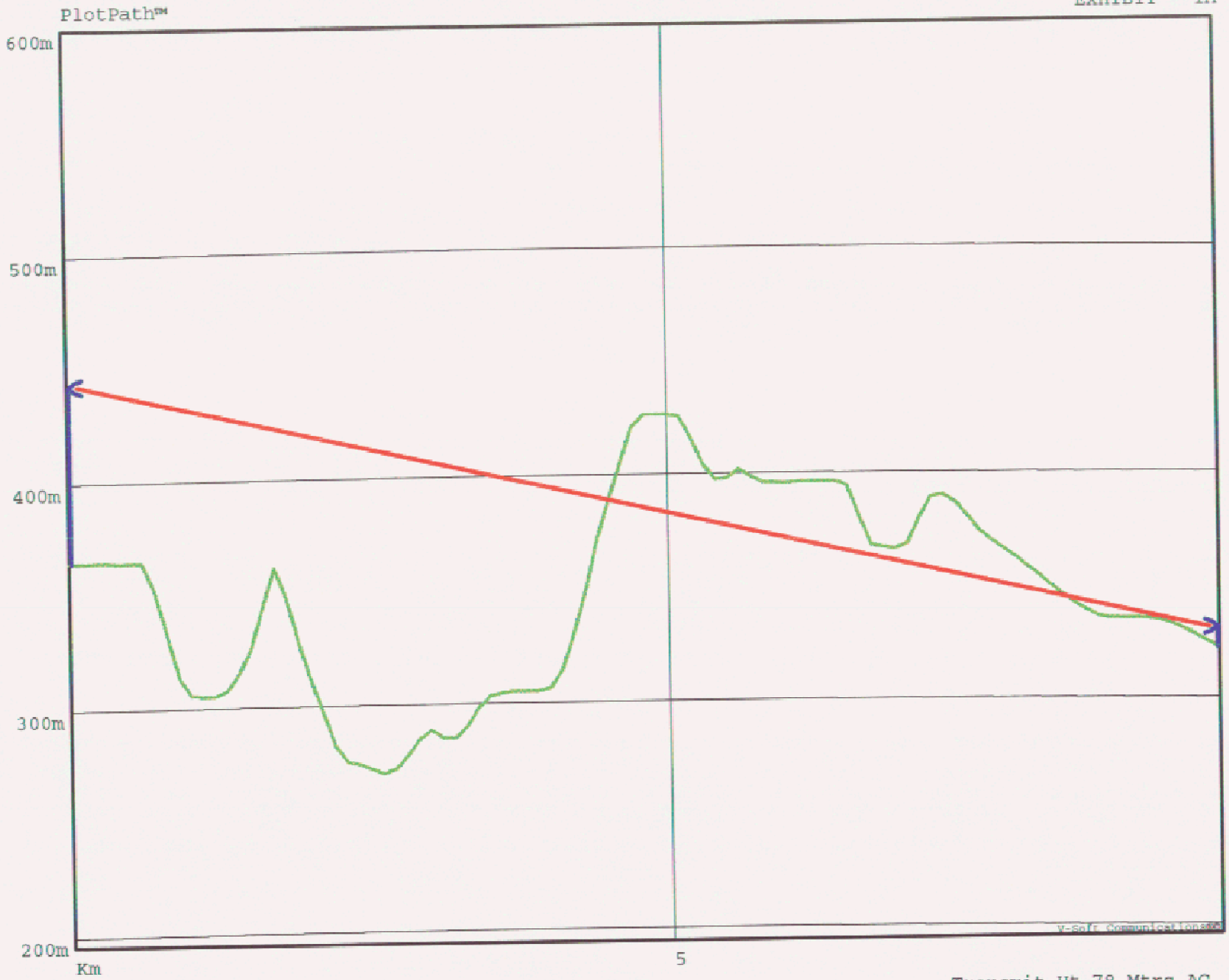
Offered as exhibit 7 is a list of facilities, both commercial and NCE's, that offer service to the area in question. Offered, as exhibit 7A, is a plot of the proposed contour and all FM facilities that overlap the proposed. 7B indicates the AM facilities and exhibit 7D shows all TV facilities. This exhibit clearly shows the Halls Crossroads community is served by no less the 66 other broadcast facilities, both AM, FM and TV. The 60 dBu for FM, .5 mV/m and grade B contours were used for exhibit 7. Since the exhibit offered by JDB, again, does not use actual contours it was somewhat difficult to determine if the 60 or 70 dBu contours were in play. Therefore, exhibit 8 depicts the 70 dBu contour reference calculations. Exhibit 8A, B, and C indicate 15 visual 19 FM and 15 AM facilities. A total of 49 facilities offer city grade service within the proposed area. This indicates that there is no need for a new FM facility in the Knoxville urbanized area.

Conclusion:

The attached exhibits and technical statements clearly show the counter proposal offered by JBD, Inc. is technically flawed and therefore should not be considered in this action. All exhibits and statements prepared by EME Communications are believed to be true and correct.

Clyde Scott, Jr.
EME Communications
293 JC Saunders Road
Moultrie, GA. 31768
229-890-2506
cscott@emecom.com

EXHIBIT - 1A



N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-22.94 dB

Azimuth = 157°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-118.85 dB

PlotPath™

EXHIBIT - 1B

N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-23.1 dB

Azimuth = 158°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-119.01 dB

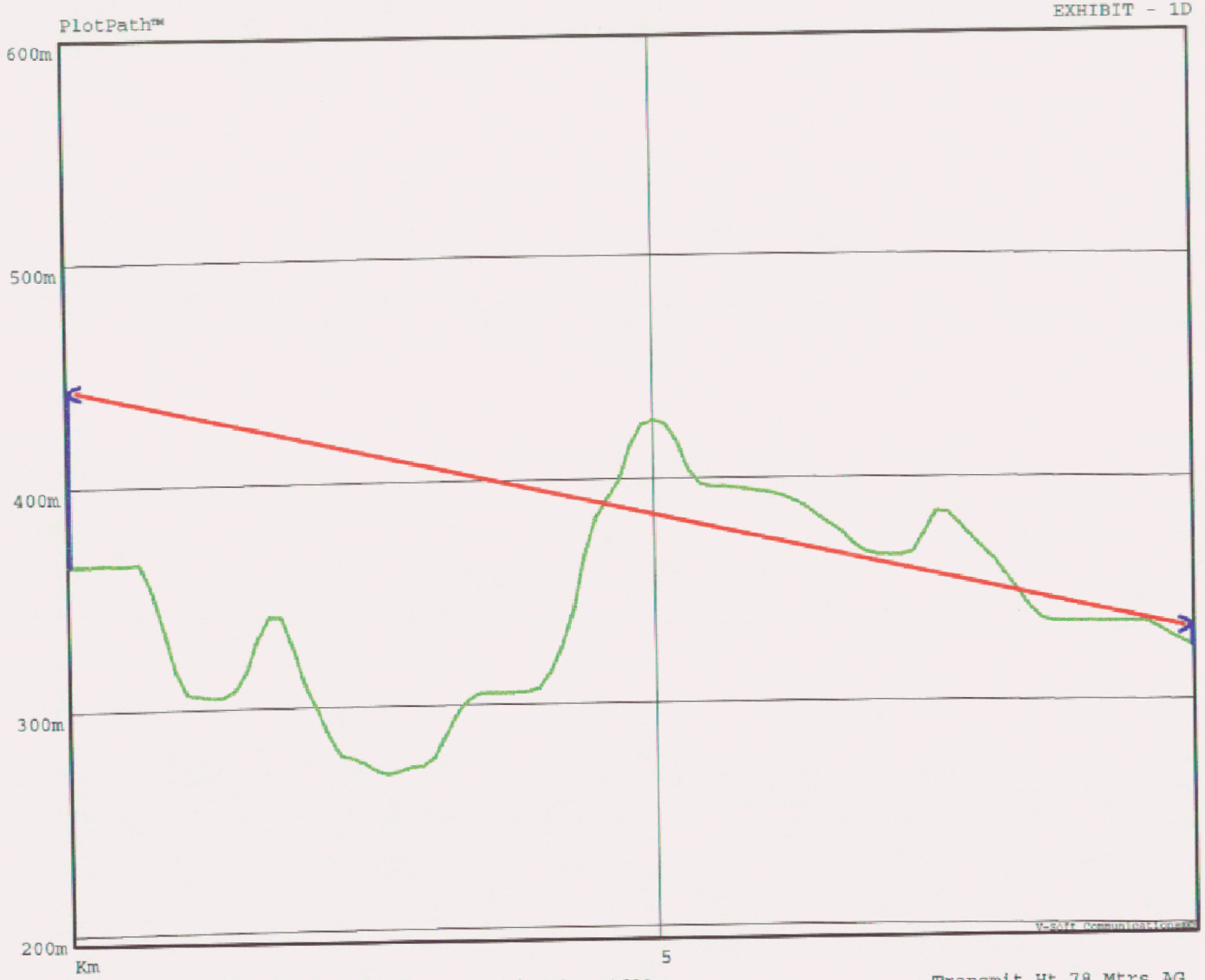
PlotPath™ EXHIBIT - 1C

N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-23.48 dB

Azimuth = 159°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-119.39 dB

EXHIBIT - 1D

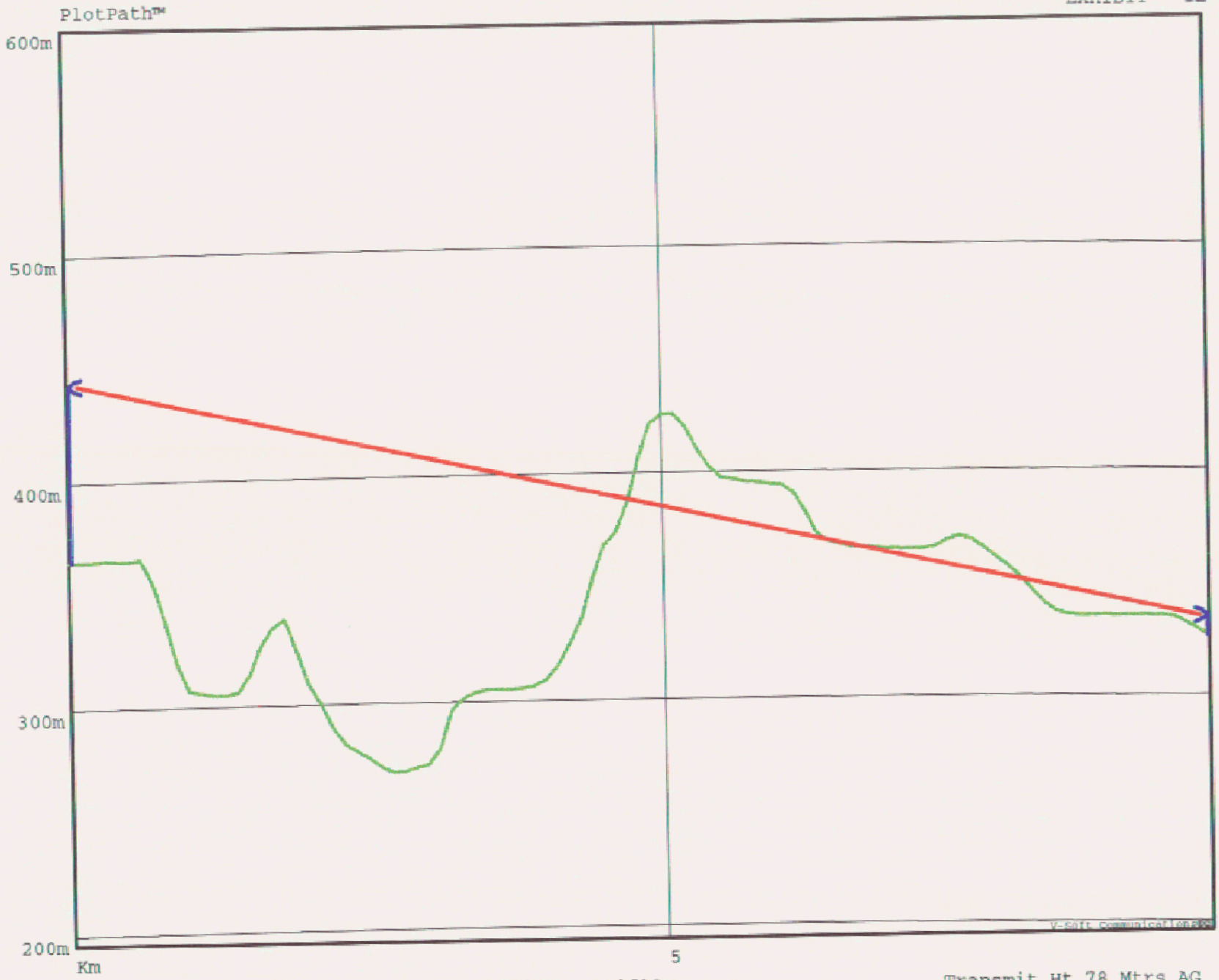


N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-22.69 dB

Azimuth = 160°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-118.6 dB

EXHIBIT - 1E

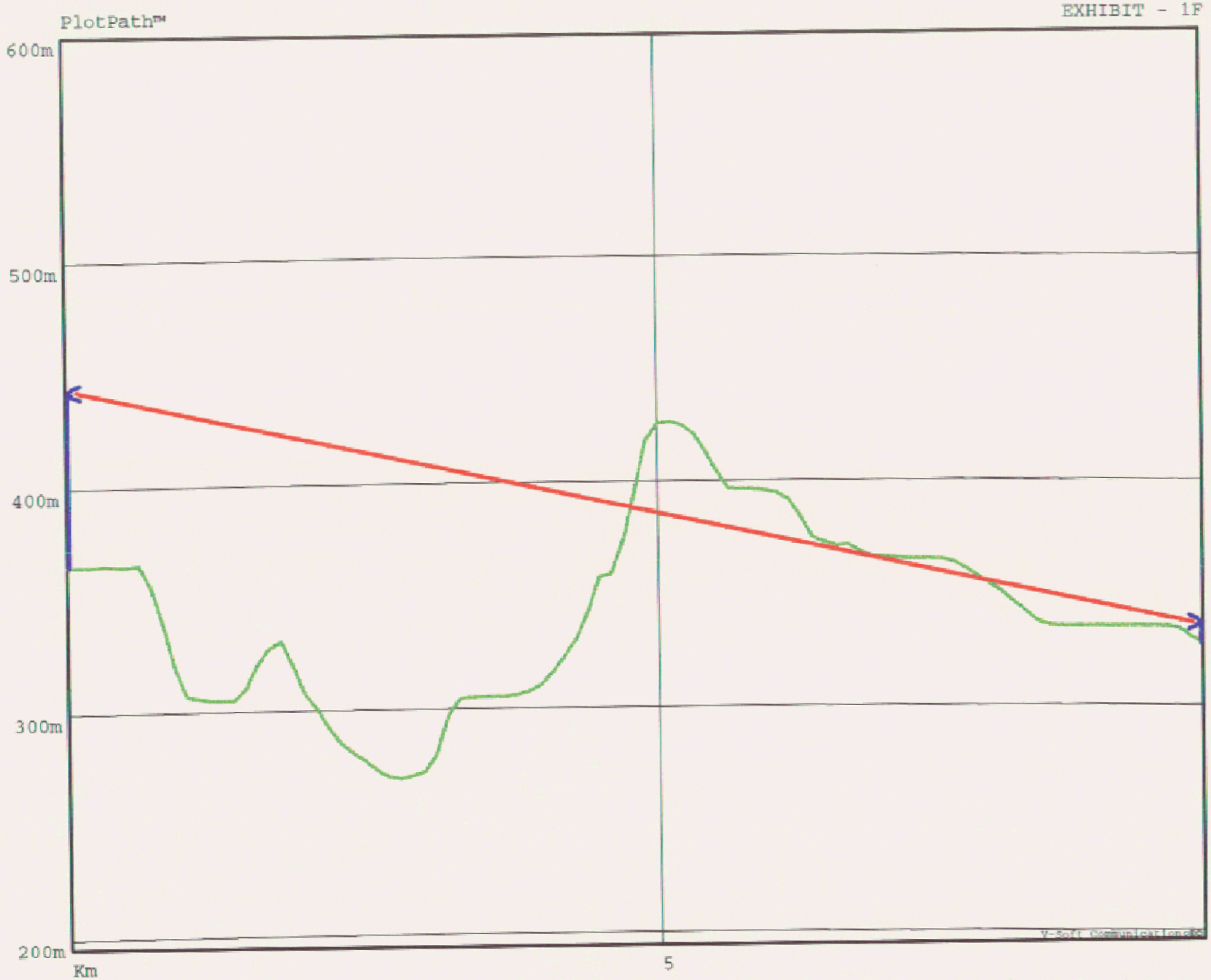


N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-23 dB

Azimuth = 161°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-118.91 dB

EXHIBIT - 1F



N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-23.41 dB

Azimuth = 162°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-119.32 dB

EXHIBIT - 1G

N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-24.19 dB

Azimuth = 163°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-120.09 dB

PlotPath™ EXHIBIT - 1H

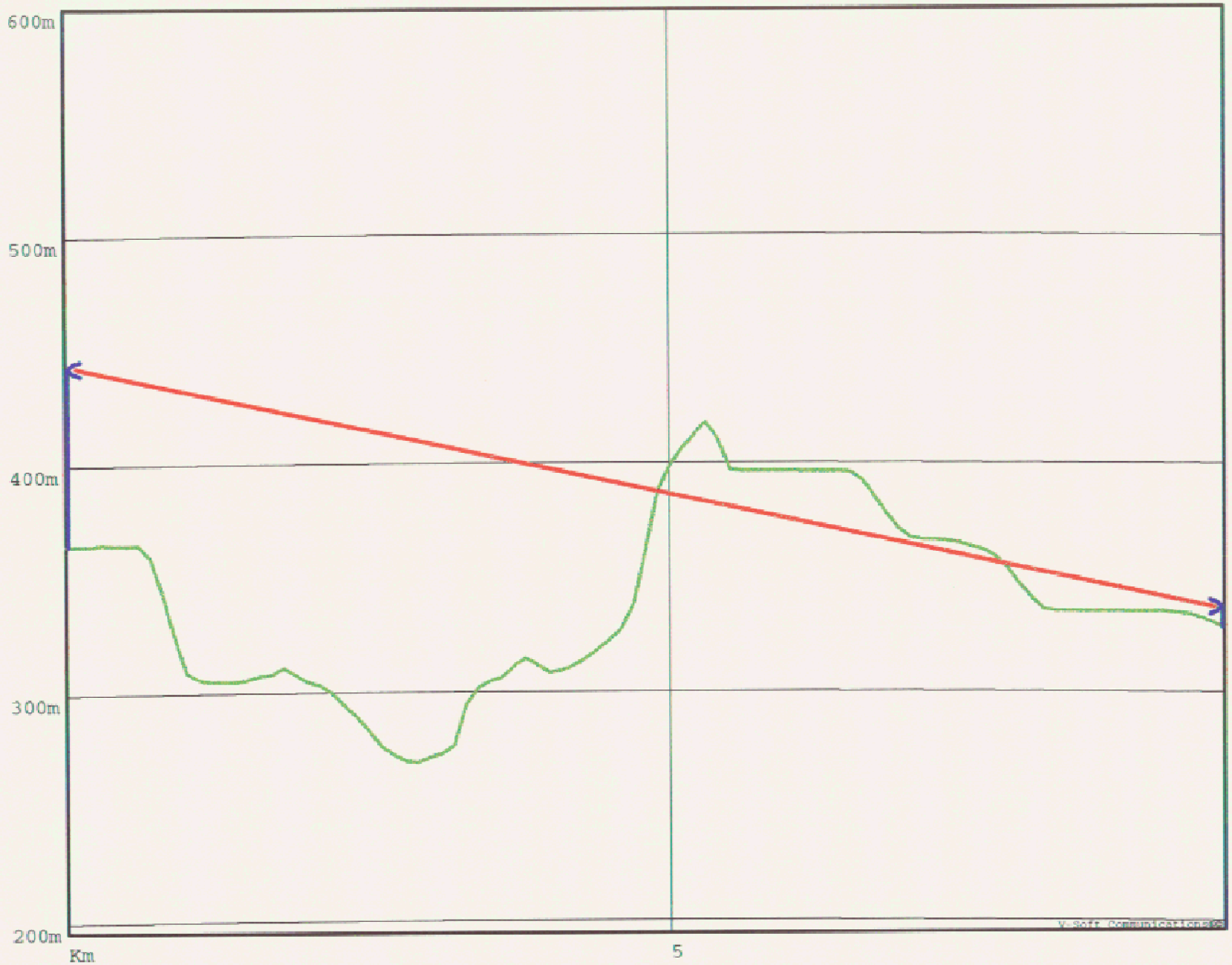
N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-23.94 dB

Azimuth = 164°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-119.84 dB

PlotPath™

EXHIBIT - 1I



N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-22.47 dB

Azimuth = 165°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-118.38 dB

PlotPath™

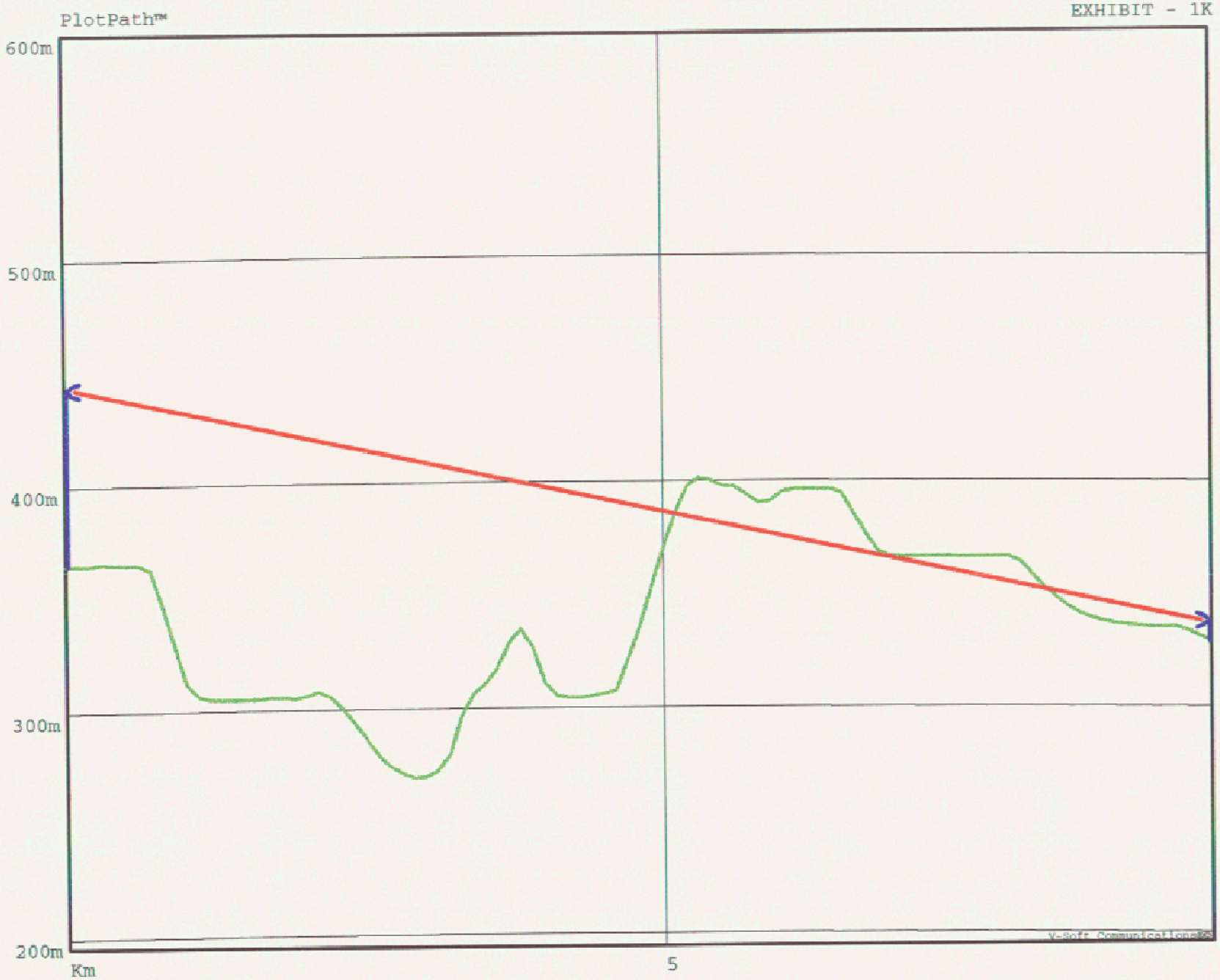
EXHIBIT - 1J

N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-21.24 dB

Azimuth = 166°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-117.15 dB

EXHIBIT - 1K

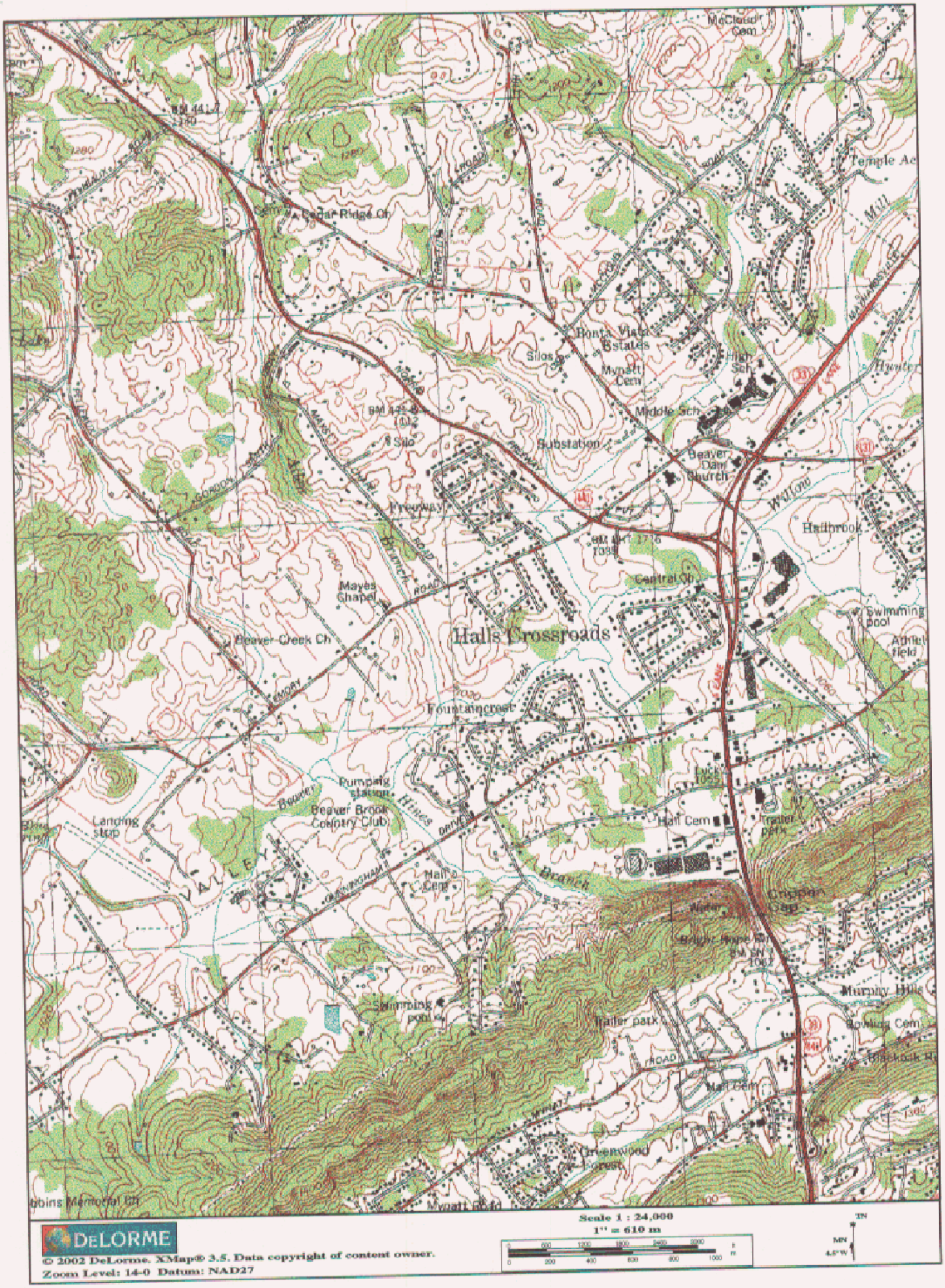


N. Lat. 360943
W. Lng. 835833
Earth = 1
Obst. Loss=-21.13 dB

Azimuth = 167°
Path Length =9.55 km
Frequency = 96.7 MHz
Free Space Loss=-95.91 dB

Transmit Ht 78 Mtrs AG
Receive Ht 9 Mtrs AG
Fresnel Zone Clearance= .6
Total Path Loss=-117.04 dB

Exhibit-2



DeLORME
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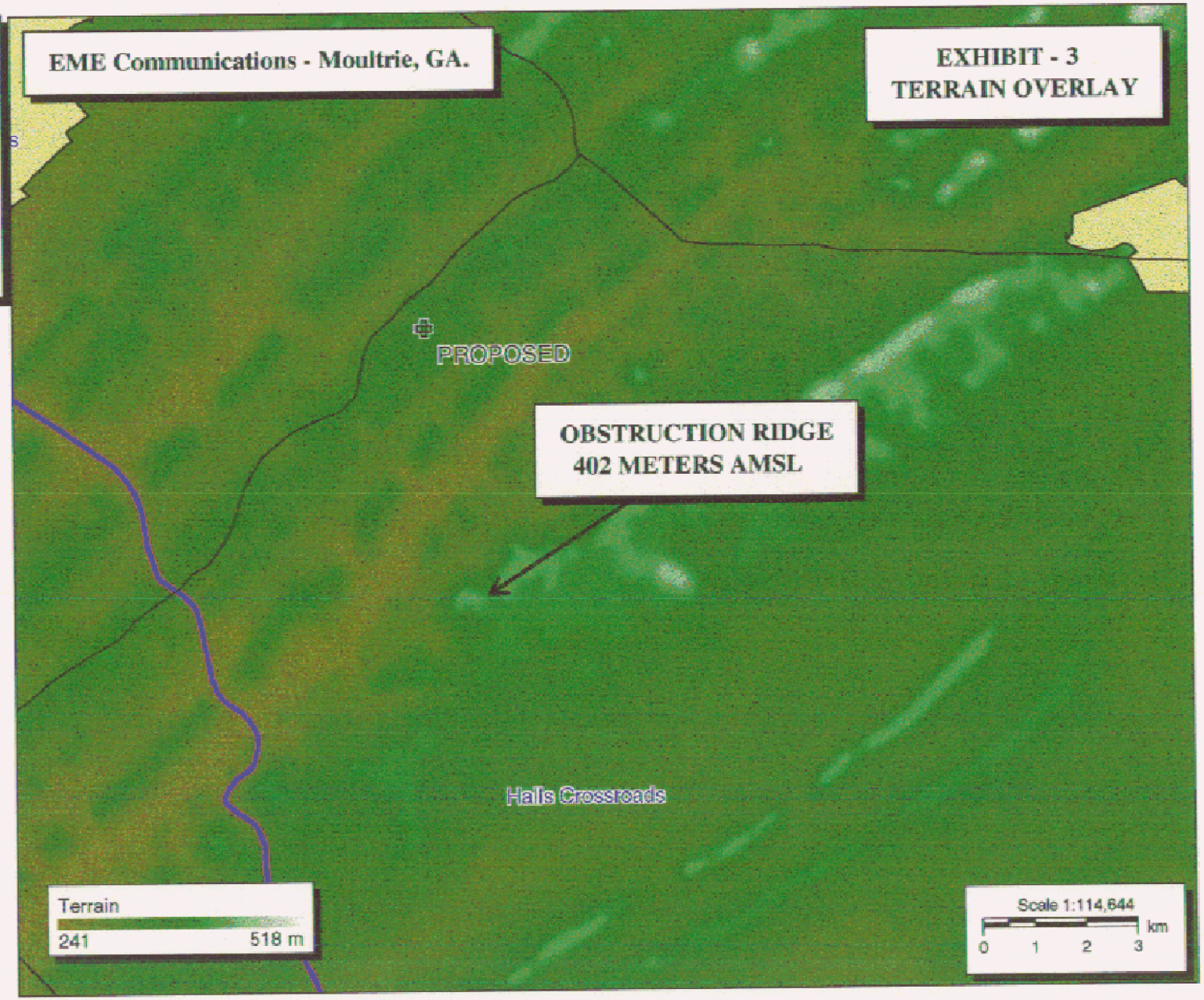
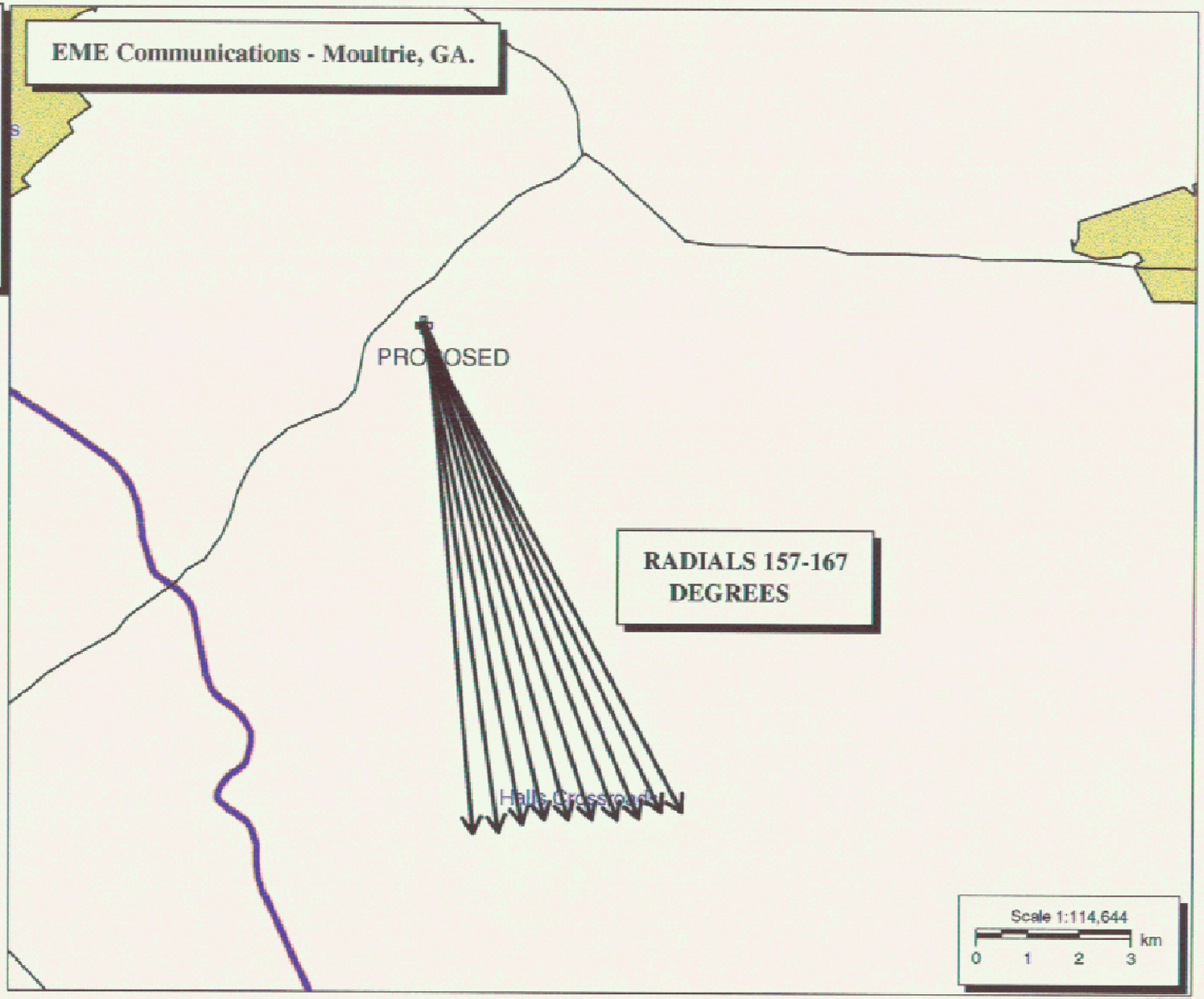
Zoom Level: 14-0 Datum: NAD27

HALLS
Latitude: 36-09-43 N
Longitude: 083-58-33 W
ERP: 6.00 kW
Channel: 244
Frequency: 96.7 MHz
AMSL Height: 443.15 m
Elevation: 365.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: FCC



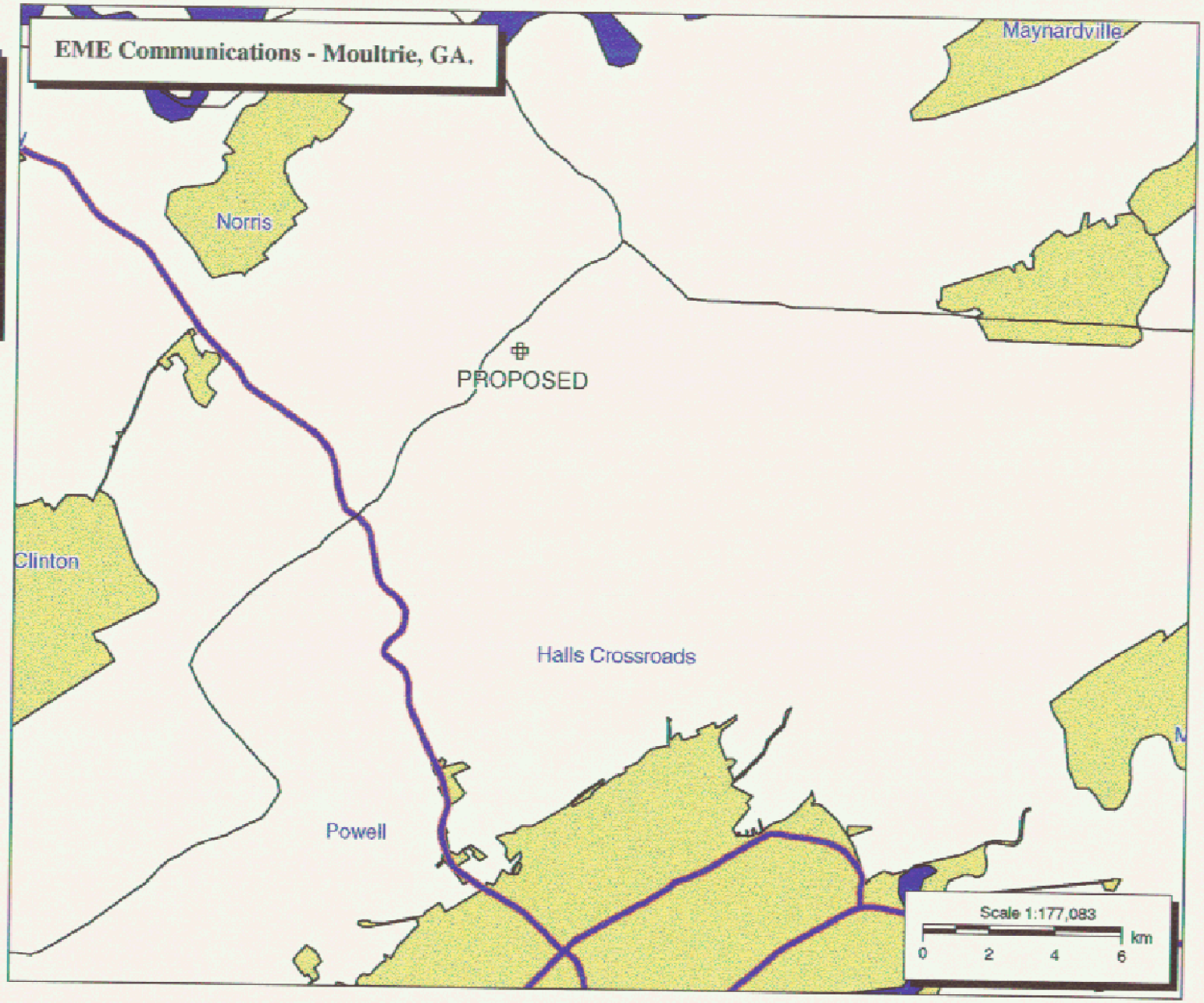
HALLS
Latitude: 36-09-43 N
Longitude: 083-58-33 W
ERP: 6.00 kW
Channel: 244
Frequency: 96.7 MHz
AMSL Height: 443.15 m
Elevation: 365.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: FCC

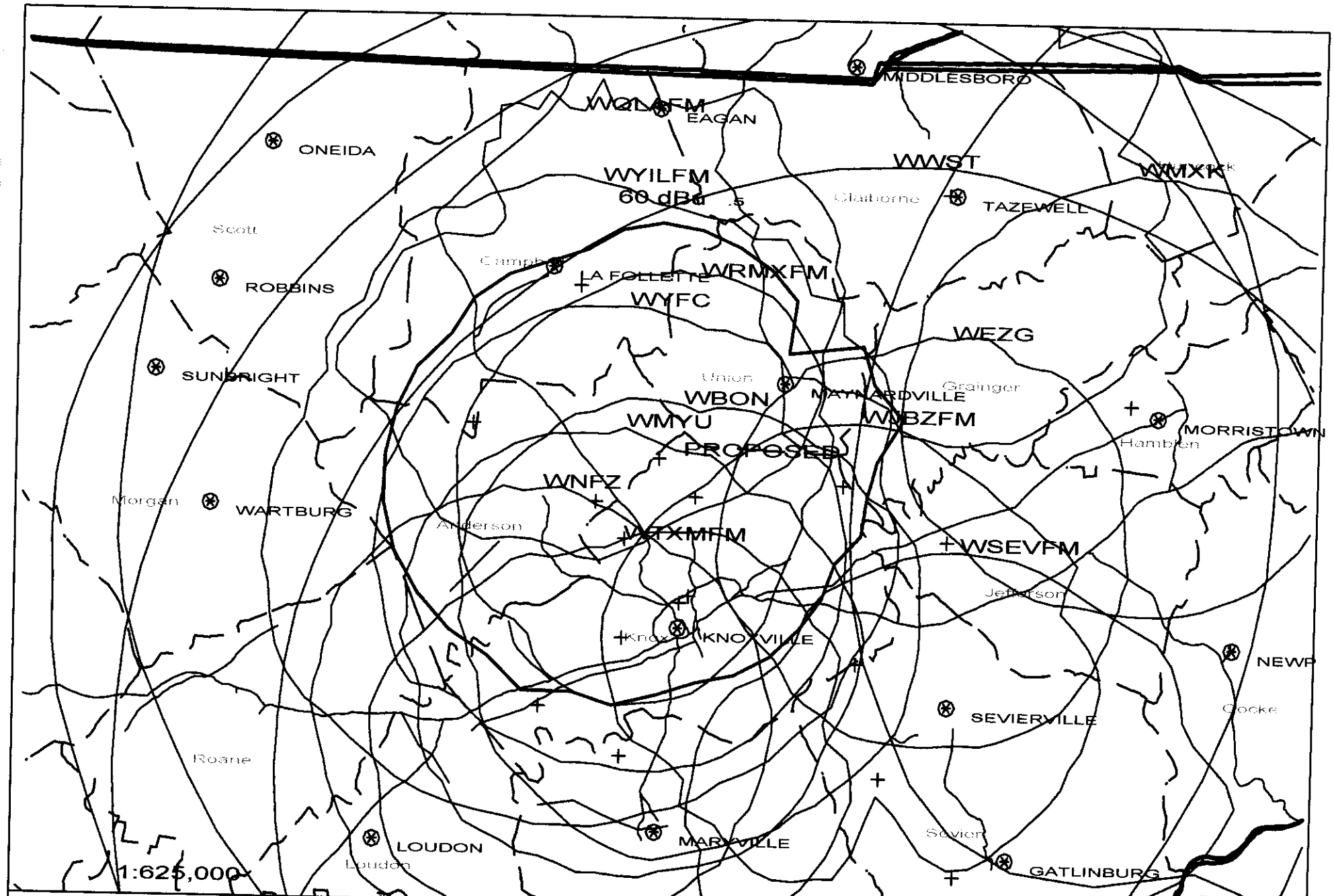
EXHIBIT - 4



HALLS
Latitude: 36-09-43 N
Longitude: 083-58-33 W
ERP: 6.00 kW
Channel: 244
Frequency: 96.7 MHz
AMSL Height: 443.15 m
Elevation: 365.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: FCC

EXHIBIT - 5

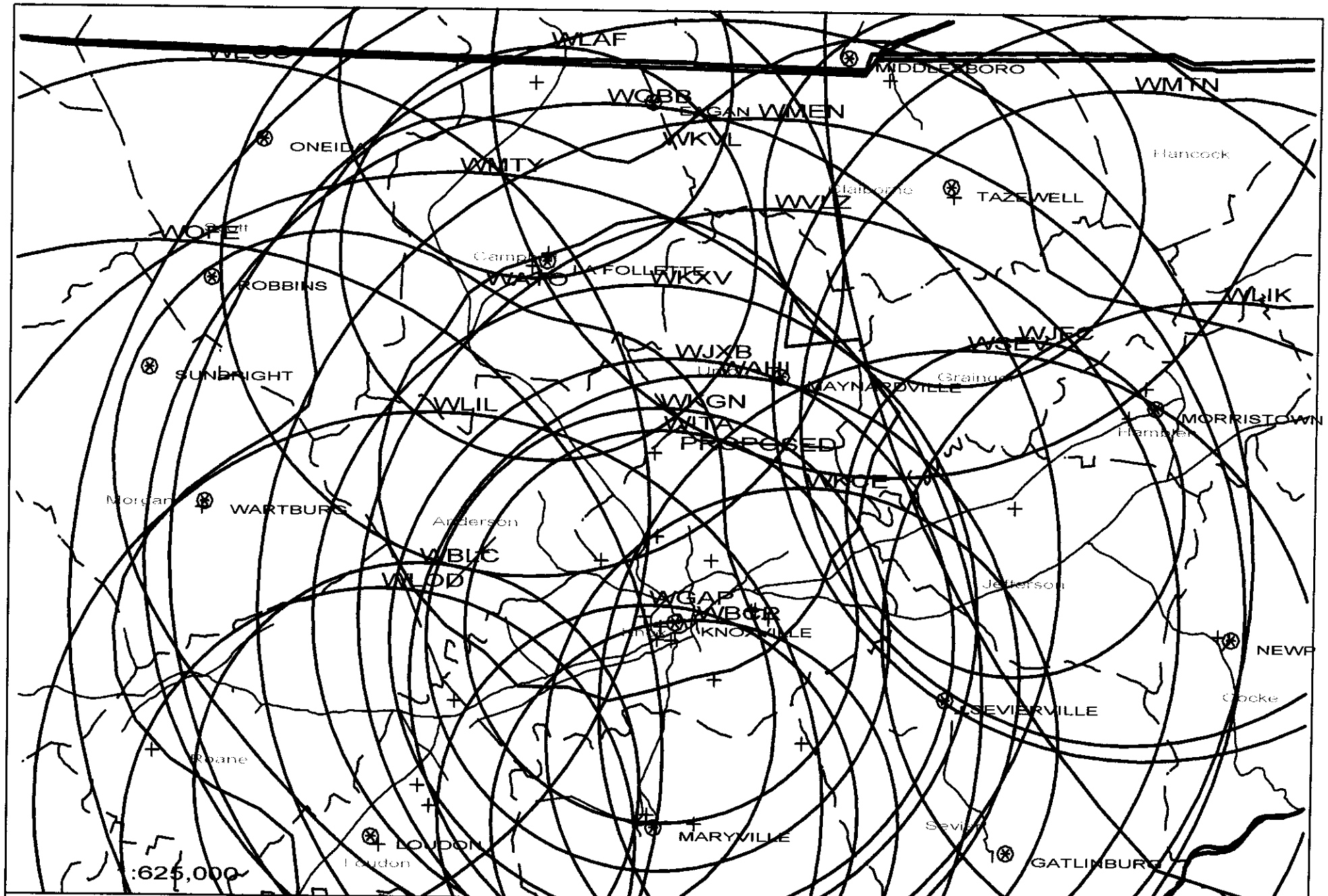



MIDDLESBORO
WQLFM
EAGAN
ONEIDA
WYILFM
60 dBu
WWST
WMXK
Claiborne
TAZEWELL
Scott
ROBBINS
LA FOLLETTE
WRMXFM
WYFC
WEZG
SUNBRIGHT
Union
Grainger
WBON
MAYNARDVILLE
WMYU
WBZFM
MORRISTOWN
Hamblen
PROPOSED
WNFZ
Morgan
WARTBURG
Anderson
WTXMFM
WSEVFM
Jefferson
Knox
KNOXVILLE
NEWP
SEVIERVILLE
Cocke
Roane
Sevier
LOUDON
Loudon
MARYVILLE
GATLINBURG
1:625,000
Scale in km
0 10 20 30 40
PROPOSED 244A 6kW 443.15M AMSL
N. Lat. 36 09 43 W. Lng. 83 58 33
EXHIBIT - 7A
- 07/03

Center = 36 09 43 N, 83 58 33 W 07-21-2003

	Call	Coordinates		Dist	Bear	Chan	Pwr(kW)	City	State	File #
1	WAEZ.L	360434N	824128W	116.1	94	235C	100	Greeneville	TN	BLH19810320AH
2	WBON.L	360008N	835641W	17.9	171	283A	2.3	Knoxville	TN	BLH19970514KA
3	WCTU.L	362732N	833507W	48.1	46	290A	2.75	Tazewell	TN	BMLH20010420AAS
4	WEZG.L	360428N	833456W	36.7	105	257A	0.94	Jefferson Cit	TN	BLH19931026KA
5	WIMZFM.L	360806N	834329W	22.8	97	278C	100	Knoxville	TN	BMLH19890601KB
6	WIVKFM.L	354841N	834010W	47.7	144	299C	91	Knoxville	TN	BLH19911008KA
7	WJBZFM.L	355617N	834211W	34.9	135	242A	2.9	Seymour	TN	BLH19950320KB
8	WJXBFM.L	360036N	835557W	17.3	167	248C	100	Knoxville	TN	BLH19890928KC
9	WMXK.L	361340N	831958W	58.3	32	231A	0.92	Morristown	TN	BMLH20010521AAF
10	WMYU.L	355746N	840123W	22.5	190	226A	2.4	Karns	TN	BLH19901218KA
11	WNFZ.L	355310N	840811W	33.9	205	232A	2.55	Oak Ridge	TN	BLH20001114AAG
12	WOKIFM.L	361153N	841351W	23.3	280	262C	100	Oak Ridge	TN	BLH6211
13	WQLAFM.L	362108N	840520W	23.4	334	285A	2.3	La Follette	TN	BMLH19900102KC
14	WRMXFM.L	360712N	835530W	6.5	135	294A	1.1	Norris	TN	BLH20010323ABC
15	WSEVFM.L	354213N	833357W	62.9	144	288A	0.53	Gatlinburg	TN	BLH19911206KC
16	WTXMFM.L	354953N	840125W	36.9	166	239A	6	Maryville	TN	BLH19990610KA
17	WWST.L	354841N	834008W	47.7	144	271C	15	Sevierville	TN	BLH19860519KF
18	WYFC.L	360421N	840118W	10.7	202	237A	1.45	Clinton	TN	BLED19980428KE
19	WYILFM.L	360648N	840344W	9.5	235	254C	8	Oliver Spring	TN	BLH19971224KF

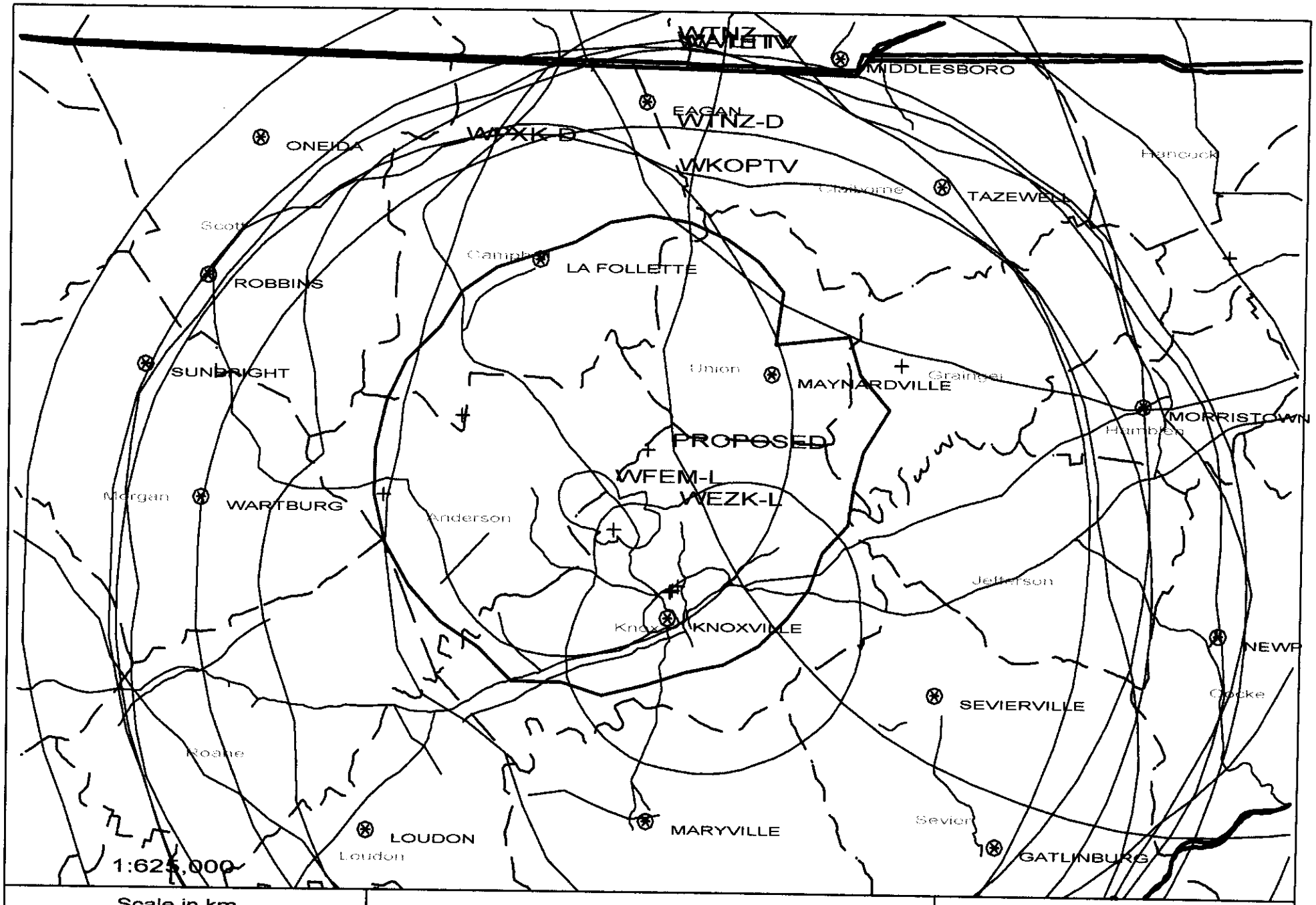
Number in list= 19


WLAF
MIDDLESBORO
WMTN
WOBR
WMEN
WKVL
ONEIDA
WMTY
Hancock
TAZEWELL
WVLZ
WOPE
ROBBINS
LA FOLLETTE
WKXV
WLIK
WJXB
SUNBRIGHT
MAYNARDVILLE
WLIL
WKGN
MORRISTOWN
PROPOSED
WKCE
WARTBURG
Anderson
WBLC
WLOD
WGAP
KNOXVILLE
NEWP
SEVIERVILLE
Cocke
Roane
MARYVILLE
LOUDON
GATLINBURG
1:625,000
Scale in km
0 10 20 30 40
PROPOSED 244A 6kW 443.15M AMSL
N. Lat. 36 09 43 W. Lng. 83 58 33
EXHIBIT - 7B
- 07/03

Center = 36 09 43 N, 83 58 33 W 07-21-2003

	Call	Coordinates		Dist	Bear	Chan	Pwr(kW)	City	State	File #
1	WAHI.L	355442N	835333W	28.8	164	1580	5	KNOXVILLE	TN	BL
2	WATO.L	360302N	841238W	24.5	239	1290	5	OAK RIDGE	TN	BL
3	WBCR.L	354508N	835504W	45.8	173	1470	0.956	ALCOA	TN	BL19990709DE
4	WBLC.L	354732N	841745W	50.2	215	1360	1	LENOIR CITY	TN	BL
5	WCRK.L	361411N	831833W	60.5	81	1150	5	MORRISTOWN	TN	BL19810810AE
6	WECO.L	360548N	843531W	55.9	262	940	5	WARTBURG	TN	BL19820521AS
7	WGAP.L	354541N	835857W	44.4	180	1400	1	MARYVILLE	TN	BL
8	WGLH.L	362202N	840850W	27.5	326	960	1	LA FOLLETTE	TN	BL19830909AB
9	WGOC.L	363119N	822525W	145	73	640	10	BLOUNTVILLE	TN	BL19930512AC
10	WITA.L	355811N	835756W	21.3	177	1490	1	KNOXVILLE	TN	BL19831215AI
11	WJFC.L	360615N	832910W	44.5	98	1480	0.5	JEFFERSON CIT	TN	BL
12	WJJT.L	363413N	840843W	47.8	341	1540	1	JELLICO	TN	BL
13	WJXB.L	355717N	835704W	23.1	174	1240	1	KNOXVILLE	TN	BL
14	WKCE.L	355032N	834621W	39.9	152	1120	1	MARYVILLE	TN	BL19970410AF
15	WKGN.L	355720N	835814W	22.9	178	1340	1	KNOXVILLE	TN	BL
16	WKVL.L	360412N	835819W	10.2	178	850	50	KNOXVILLE	TN	BL
17	WKXV.L	355852N	835915W	20.1	183	900	1	KNOXVILLE	TN	BL
18	WLAF.L	362252N	840732W	27.8	331	1450	1	LA FOLLETTE	TN	BL
19	WLIK.L	355749N	831231W	72.5	107	1270	5	NEWPORT	TN	BL
20	WLIL.L	354612N	841647W	51.4	212	730	1	LENOIR CITY	TN	BL
21	WLOD.L	354335N	842049W	58.8	214	1140	1	LOUDON	TN	BL19830603AK
22	WMEN.L	355918N	835035W	22.7	148	760	2.4	KNOXVILLE	TN	BL19951031AH
23	WMTN.L	361215N	831957W	58.1	85	1300	5	MORRISTOWN	TN	BL19810122AD
24	WMTY.L	355312N	841448W	39.1	218	670	2.5	FARRAGUT	TN	BL19960216AA
25	WNOX.L	360237N	835354W	14.9	152	990	10	KNOXVILLE	TN	BL
26	WNTT.L	362649N	833419W	48.1	48	1250	0.5	TAZEWELL	TN	BL19991210AAX
27	WOFE.L	354940N	843919W	71.6	238	580	1	ROCKWOOD	TN	BL
28	WQBB.L	360234N	840251W	14.7	205	1040	10	POWELL	TN	BL19890420AF
29	WRJZ.L	355924N	835015W	22.8	146	620	5	KNOXVILLE	TN	BL19791210AF
30	WRWB.L	363432N	833937W	53.9	31	740	1	HARROGATE	TN	BL19840329AC
31	WSEV.L	355242N	833318W	49.3	129	930	5	SEVIERVILLE	TN	BL19821123AF
32	WVLZ.L	355848N	834909W	24.6	145	1180	10	KNOXVILLE	TN	BL19880714AI
33	WYSH.L	360648N	840830W	15.9	250	1280	1	CLINTON	TN	BL19960806AB

Number in list= 33


WTNZ
WATE TV
MIDDLESBORO
EAGAN
WTNZ-D
WAYK-D
ONEIDA
WKOPTV
Hancock
Claiborne
TAZEWELL
Scott
Campbell
LA FOLLETTE
ROBBINS
SUNBRIGHT
Union
MAYNARDVILLE
Grainger
MORRISTOWN
Hamblen
PROPOSED
WFEM-L
WEZK-L
Morgan
WARTBURG
Anderson
Jefferson
Knox
KNOXVILLE
NEWP
Cocke
SEVIERVILLE
Roane
Sevier
MARYVILLE
LOUDON
Loudon
GATLINBURG
1:625,000
Scale in km
0 10 20 30 40
PROPOSED 244A 6kW 443.15M AMSL
N. Lat. 36 09 43 W. Lng. 83 58 33
EXHIBIT - 7D
- 07/03

Center = 36 09 43 N, 83 58 33 W 07-21-2003

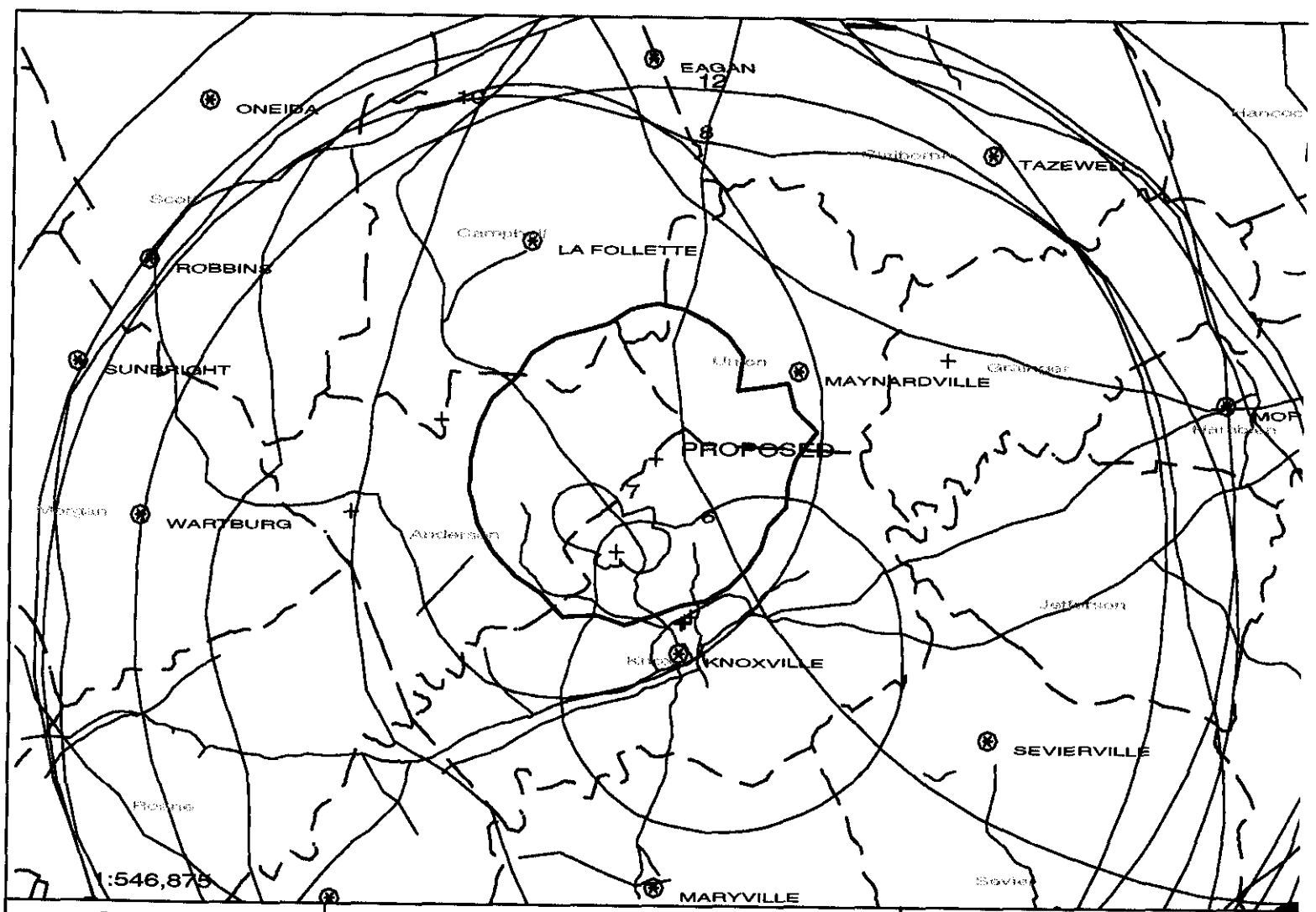
	Call	Coordinates		Dist	Bear	Chan	Pwr(kW)	City	State	File #
1	WAGV.L	364800N	832236W	88.9	36	44-2	1000	Harlan	KY	BLCT19990812KE
2	WATETV.L	360013N	835635W	17.8	170	06Z2	100	Knoxville	TN	BLCT20020726ABM
3	WBIRTV.L	360019N	835623W	17.7	169	10+2	316	Knoxville	TN	BLCT19800109KE
4	WBXXTV.L	360633N	842017W	33.1	259	20+2	3630	Crossville	TN	BLCT19971028KE
5	WETPTV.L	362252N	831048W	75.5	70	02+2	100	Sneedville	TN	BMLET19840627KG
6	WEZK-L.L	360036N	835557W	17.3	167	28ZT	5.9	Knoxville	TN	BLTTL20001011ACO
7	WFEM-L.L	360421N	840118W	10.7	202	12-T	0.123	Heiskell, Etc	TN	BLTVL19910624JI
8	WKOPTV.L	360019N	835623W	17.7	169	15-2	2240	Knoxville	TN	BLET19900829KE
9	WPXK.L	361153N	841351W	23.3	280	54-2	4900	Jellico	TN	BLCT20000303AAQ
10	WPXK-D.L	361153N	841351W	23.3	280	23 2	18	Jellico	TN	BLCDT20020510AAJ
11	WTNZ.L	360013N	835635W	17.8	170	43+2	1960	Knoxville	TN	BLCT20021101AAE
12	WTNZ-D.L	360013N	835635W	17.8	170	34 2	460	Knoxville	TN	BLCDT20021104AAE
13	WVLR.L	361530N	833743W	33	70	48+2	5000	Tazewell	TN	BLCT20021018AAM
14	WVLTTV.L	360036N	835557W	17.3	167	08Z2	316	Knoxville	TN	BLCT19881223KE

Number in list= 14

Duopoly Study Center = 36 09 43 N, 83 58 33 W 07-22-2003

	Call	Coordinates	Dist	Bear	Chan	Pwr(kW)	City	State	File #
1	*PROPOSE	NLat36 3WLng	835833						
				0	24	6			g 835833
2	WAGV.L	364800N 832236W	88.9	36	44-2	1000	Harlan	KY	BLCT19990812KE
3	WATETV.L	360013N 835635W	17.8	170	06Z2	100	Knoxville	TN	BLCT20020726ABM
4	WBIRTV.L	360019N 835623W	17.7	169	10+2	316	Knoxville	TN	BLCT19800109KE
5	WBXXTV.L	360633N 842017W	33.1	259	20+2	3630	Crossville	TN	BLCT19971028KE
6	WETPTV.L	362252N 831048W	75.5	70	02+2	100	Sneedville	TN	BMLET19840627KG
7	WEZK-L.L	360036N 835557W	17.3	167	28ZT	5.9	Knoxville	TN	BLTTL20001011ACO
8	WFEM-L.L	360421N 840118W	10.7	202	12-T	0.123	Heiskell, Etc	TN	BLTVL19910624JI
9	WKOPTV.L	360019N 835623W	17.7	169	15-2	2240	Knoxville	TN	BLET19900829KE
10	WPXK.L	361153N 841351W	23.3	280	54-2	4900	Jellico	TN	BLCT20000303AAQ
11	WPXK-D.L	361153N 841351W	23.3	280	23 2	18	Jellico	TN	BLCDT20020510AAJ
12	WTNZ.L	360013N 835635W	17.8	170	43+2	1960	Knoxville	TN	BLCT20021101AAE
13	WTNZ-D.L	360013N 835636W	17.8	170	34 2	460	Knoxville	TN	BLCDT20021104AAE
14	WVLR.L	361530N 833743W	33	70	48+2	5000	Tazewell	TN	BLCT20021018AAM
15	WVLTTV.L	360036N 835557W	17.3	167	08Z2	316	Knoxville	TN	BLCT19881223KE

Number in list= 15



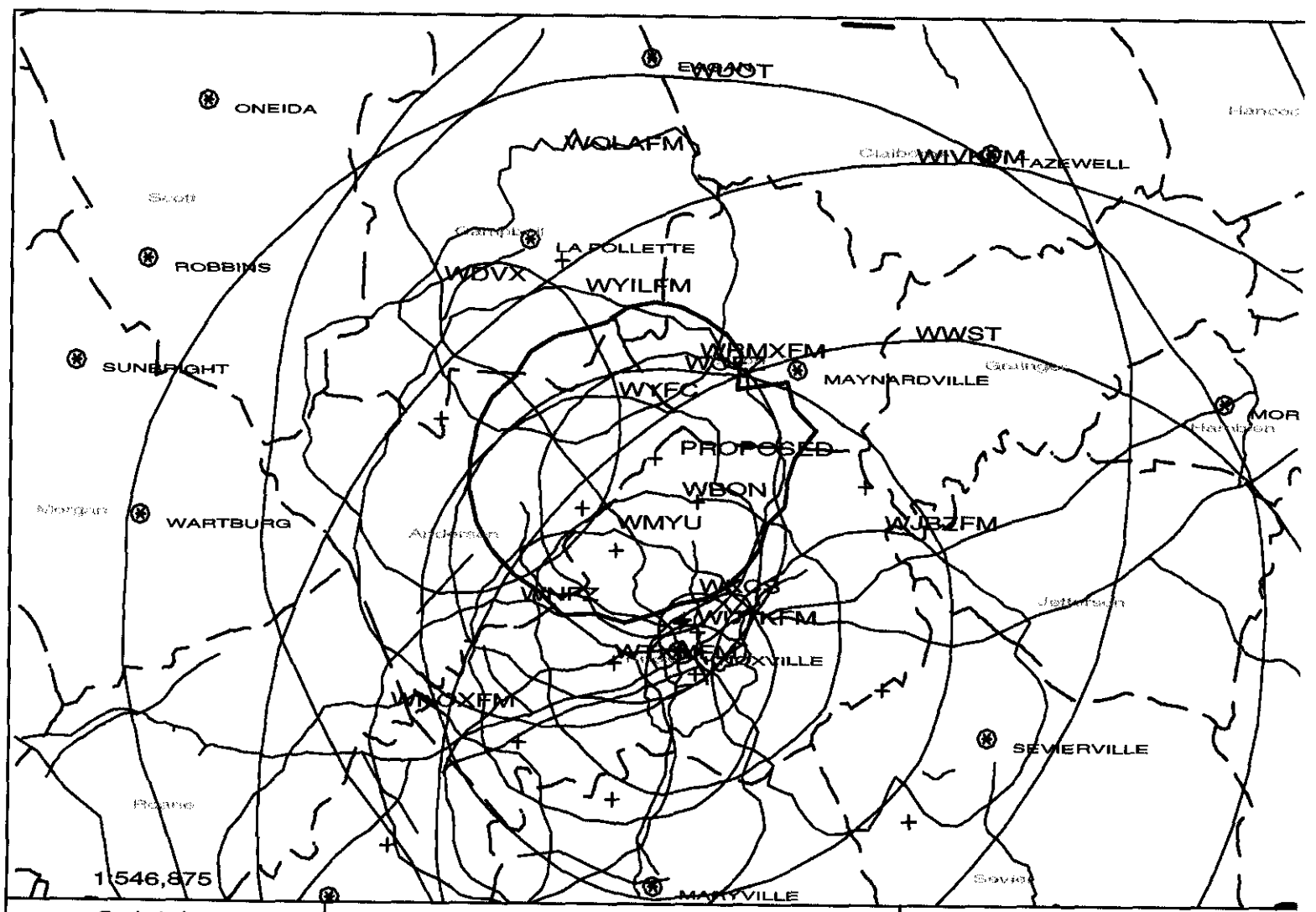
PROPOSED 244A 6kW 443.15M AMSL
N. Lat. 36 09 43 W. Lng. 83 58 33

EXHIBIT - 8A
- 07/03

Duopoly Study Center = 36 09 43 N, 83 58 33 W 07-22-2003

	Call	Coordinates	Dist	Bear	Chan	Pwr(kW)	City	State	File #
1	WBON.L	360008N 835641W	17.9	171	283A	2.3	Knoxville	TN	BLH19970514KA
2	WDVX.L	361153N 841351W	23.3	280	210C	0.2	Clinton	TN	BLED19961231KA
3	WIMZFM.L	360806N 834329W	22.8	97	278C	100	Knoxville	TN	BMLH19890601KB
4	WIVKFM.L	354841N 834010W	47.7	144	299C	91	Knoxville	TN	BLH19911008KA
5	WKCS.L	355936N 835524W	19.3	165	216A	0.31	Knoxville	TN	BLED126
6	WKVLFM.L	354840N 841602W	47	214	287A	6	Loudon	TN	BLH19910530KC
7	WMYU.L	355746N 840123W	22.5	190	226A	2.4	Karns	TN	BLH19901218KA
8	WNFZ.L	355310N 840811W	33.9	205	232A	2.55	Oak Ridge	TN	BLH20001114AAG
9	WOEZ.L	360013N 835634W	17.8	170	202C	2.85	Maynardville	TN	BLED20030227ADG
10	WOKIFM.L	361153N 841351W	23.3	280	262C	100	Oak Ridge	TN	BLH6211
11	WQLAFM.L	362108N 840520W	23.4	334	285A	2.3	La Follette	TN	BMLH19900102KC
12	WRMXFM.L	360712N 835530W	6.5	135	294A	1.1	Norris	TN	BLH20010323ABC
13	WTXMFM.L	354953N 840125W	36.9	186	239A	6	Maryville	TN	BLH19990610KA
14	WUOT.L	360019N 835623W	17.7	169	220C	100	Knoxville	TN	BLED19890201KB
15	WUTKFM.L	355709N 835534W	23.7	169	212A	0.8	Knoxville	TN	BLED19950410KI
16	WWST.L	354841N 834008W	47.7	144	271C	15	Sevierville	TN	BLH19860519KF
17	WYFC.L	360421N 840118W	10.7	202	237A	1.45	Clinton	TN	BLED19980428KE
18	WYILFM.L	360648N 840344W	9.5	235	254C	8	Oliver Spring	TN	BLH19971224KF
19	WYLV.L	360013N 835634W	17.8	170	206C	1.6	Alcoa	TN	BLED20030227ADH

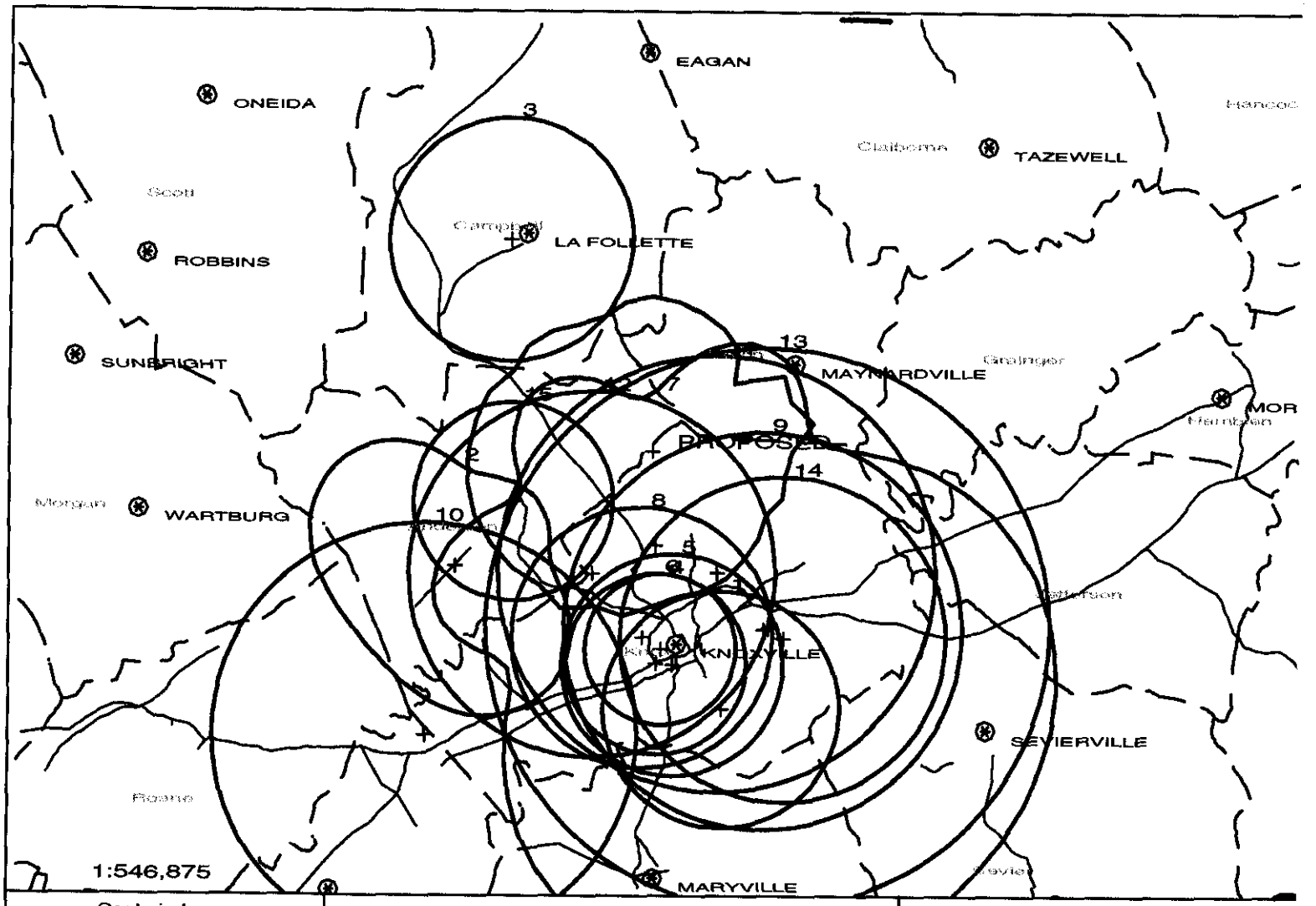
Number in list= 19



Duopoly Study Center = 36 09 43 N, 83 58 33 W 07-22-2003

	Call	Coordinates	Dist	Bear	Chan	Pwr(kW)	City	State	File #
1	WAHI.L	355442N 835333W	28.8	164	1580	5	KNOXVILLE	TN	BL
2	WATO.L	360302N 841238W	24.5	239	1290	5	OAK RIDGE	TN	BL
3	WGLH.L	362202N 840850W	27.5	326	960	1	LA FOLLETTE	TN	BL19830909AB
4	WITA.L	355811N 835756W	21.3	177	1490	1	KNOXVILLE	TN	BL19831215AI
5	WJXB.L	355717N 835704W	23.1	174	1240	1	KNOXVILLE	TN	BL
6	WKGN.L	355720N 835814W	22.9	178	1340	1	KNOXVILLE	TN	BL
7	WKVL.L	360412N 835819W	10.2	178	850	50	KNOXVILLE	TN	BL
8	WKXV.L	355852N 835915W	20.1	183	900	1	KNOXVILLE	TN	BL
9	WMEN.L	355918N 835035W	22.7	148	760	2.4	KNOXVILLE	TN	BL19951031AH
10	WMTY.L	355312N 841448W	39.1	218	670	2.5	FARRAGUT	TN	BL19960216AA
11	WNOX.L	360237N 835354W	14.9	152	990	10	KNOXVILLE	TN	BL
12	WQBB.L	360234N 840251W	14.7	205	1040	10	POWELL	TN	BL19890420AF
13	WRJZ.L	355924N 835015W	22.8	146	620	5	KNOXVILLE	TN	BL19791210AE
14	WVLZ.L	355848N 834909W	24.6	145	1180	10	KNOXVILLE	TN	BL19880714AI
15	WYSH.L	360648N 840830W	15.9	250	1380	1	CLINTON	TN	BL19960806AB

Number in list= 15



PROPOSED 244A 6kW 443.15M AMSL
N. Lat. 36 09 43 W. Lng. 83 58 33

EXHIBIT - 8C
- 07/03

CERTIFICATE OF SERVICE

I, Lisa A. Blackburn, a secretary at the law firm of Womble Carlyle Sandridge & Rice, PLLC, do hereby certify that true copies of the foregoing "Reply Comments" were mailed, postage prepaid on this 28th day of July, 2003, to the following:

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Federal Communications Commission
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Lisa A. Blackburn

*Via Hand Delivery