

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

In the Matter of)
)
 Reexamination of the Comparative Standards for)
 Noncommercial Educational Applicants) MM Docket No. 95-31
)

MEMORANDUM OPINION AND ORDER

Adopted: February 15, 2001

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By the Commission: Commissioner Furchtgott-Roth issuing a statement

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I. INTRODUCTION

1. On April 4, 2000 we adopted a new simplified system to select among applicants competing to construct noncommercial educational (“NCE”) broadcast stations, thereby eliminating the lengthy traditional hearings which we had used for 30 years. The new approach uses a point system to select among mutually exclusive proposals to build FM, TV, and FM translator stations on channels reserved for NCE use. The system for awarding points is based on such factors as diversity, localism, signal coverage, and service to schools, with a permit awarded to the applicant with the highest score. When NCE entities compete on channels also available for commercial use, we concluded that adoption of auction procedures was statutorily mandated. We now consider seventeen Petitions for Reconsideration or Clarification, ranging from requests for minor clarifications to advocacy of vastly different policy results. Upon considering these views, we basically affirm our initial decision but clarify various details, provide additional information, and amend several rule sections.

II. BACKGROUND AND HISTORY

2. Due to the finite nature of and strong demand for broadcast spectrum, we often cannot authorize an NCE station to every qualified entity that wants to build one in a particular area. Rather, we frequently must choose among multiple applicants. From the earliest days of broadcasting, the Commission conducted traditional evidentiary hearings to make these selection decisions. The factors we considered in hearings depended upon which of two types of channels the applicants wanted to use. For “reserved” channels, which are for noncommercial educational use only, we considered “the extent to which each of the proposed operations will be integrated into the overall educational operations and objectives of the respective applicants.” *See New York University*, 10 RR 2d 215, 217-18 (1967). For “non-reserved” channels, which are for all types of broadcasting, commercial and noncommercial, we used several comparative criteria. For example, we considered diversity of ownership and the “integration” of ownership and management, which presumed that a station would offer better service if its owners were involved in the station’s day-to-day management. *See Policy Statement on Comparative Broadcast Hearings*, 1 FCC 2d 393 (1965). In comparative contests between NCE and commercial applicants on non-reserved channels, the applicants were evaluated using the commercial criteria.

3. As discussed in greater detail earlier in this proceeding, several events in the 1990’s led to our eventual change of the comparative selection process both for NCE and commercial stations, and for both reserved and non-reserved channels. These events included the conclusion of the Commission’s Review Board that the NCE criteria had, over time, become “meaningless” in distinguishing between applicants, and a federal court’s finding that the core integration criterion used to evaluate non-reserved channel applications was “arbitrary and capricious, and therefore unlawful.” *FCC v. Bechtel*, 10 F.3d 875, 878 (D.C. Cir. 1993) (*Bechtel*); *Real Life Educational Foundation of Baton Rouge, Inc.*, 6 FCC Rcd 2577, 2580, n.8 (Rev. Bd. 1991). As a result of Commission proceedings soliciting public comment, and Congress’ decision on related matters in the Balanced Budget Act of 1997,¹ we implemented a system of

¹ *Balanced Budget Act of 1997*, Pub. L. No. 105-33, 11 Stat. 251 (1997) (Balanced Budget Act).

competitive bidding for awarding permits on non-reserved channels² and adopted new point-based comparative standards for reserved channel noncommercial educational proceedings.³ The NCE rules under review in this proceeding became effective on August 7, 2000.

III. NEW SELECTION PROCESS

4. Our NCE Order⁴ established that the nature of the channel, not the nature of the applicant, should govern selection procedures. We decided that we were required by statute to use auctions to select among all mutually exclusive applicants for non-reserved channels, because such channels can be used for commercial purposes. We designed a point system, described in greater detail below, to select among applicants on reserved channels. We determined that this bifurcated, channel-specific selection method is consistent with the Balanced Budget Act's dual directives to recover for the public the value of commercially available channels, but to use a different selection method for stations that cannot be used commercially. All requests for agency reconsideration or clarification focus on our point system decision for reserved noncommercial channels; none address our decision to apply auction procedures when NCE entities are among the applicants competing for non-reserved channels.⁵ Accordingly, in this order we revisit reserved channel procedures only.

5. The NCE Order requires reserved channel applicants to apply during specific filing windows to be announced by public notice. The staff will examine all applications received within the window, to determine whether any two or more of those proposals are mutually exclusive, *i.e.* to determine whether the proposed stations would cause prohibited interference to each other and thus cannot all be authorized. If a particular application is not mutually exclusive, and the applicant is subsequently found qualified, the staff will grant that application. For mutually exclusive applications received during the filing window, the staff

² *Notice of Proposed Rulemaking, Reexamination of the Policy Statement on Comparative Broadcast Hearings*, GC Docket No. 92-52, 7 FCC Rcd 2664 (1992); *Further Notice of Proposed Rulemaking*, 8 FCC Rcd 5475 (1993); *Second Further Notice of Proposed Rulemaking*, GC Docket No. 92-52, 9 FCC Rcd 2821 (1994); *Notice of Proposed Rulemaking, Competitive Bidding for Commercial Broadcast and ITFS Service Licenses*, MM Docket No. 97-234, GC Docket No. 92-52, Gen. Docket No. 90-264, 12 FCC Rcd 22,363 (1997); *First Report and Order*, MM Docket No. 97-234, GC Docket No. 92-52, Gen. Docket No. 90-264, 13 FCC Rcd 15920 (1998), *recon. denied Memorandum Opinion and Order*, 14 FCC Rcd 8724, *modified Memorandum Opinion and Order*, 14 FCC Rcd 12,541 (1999), *aff'd sub nom. Orion Communications, Ltd. v. FCC*, 213 F.3d 761 (D.C. Cir.2000) ("Competitive Bidding").

³ *Notice of Proposed Rulemaking, Comparative Standards for Noncommercial Educational Applicants*, MM Docket 95-31, 10 FCC Rcd 2877 (1995); *Further Notice of Proposed Rulemaking*, MM Docket No. 95-31, 13 FCC Rcd 21167 (1998) ("NCE Notice"); *Report and Order*, MM Docket No. 95-31, 15 FCC Rcd 7386 (2000).

⁴ *Report and Order, Comparative Standards for Noncommercial Educational Applicants*, MM Docket No. 95-31, 15 FCC Rcd 7386 (2000) ("NCE Order").

⁵ Currently, there are approximately 32 pending groups of non-reserved channel radio applicants, consisting of 192 applications, in which at least one applicant is an NCE entity. There are 5 such groups of non-reserved channel television applicants, consisting of 22 applications. Parties disagreeing with our decision to auction non-reserved channels, including National Public Radio and the State of Oregon, brought their challenge directly to the U.S. Court of Appeals for the D.C. Circuit rather than seeking agency reconsideration. *See National Public Radio, No. 00-1246* (filed June 12, 2000); *State of Oregon, No. 00-1255* (filed June 16, 2000). Although two petitioners, Spring Arbor College and Lay Catholic Broadcasting, originally sought agency reconsideration with respect to this issue, they subsequently withdrew those requests.

will compare the proposals, considering which would best serve the public interest under our new point system.

6. When competing FM applications propose to serve different communities, a proposal would be considered best, as a threshold matter, if it would provide service to significant unserved or underserved populations.⁶ This threshold factor is considered pursuant to 47 U.S.C. § 307(b), which charges the Commission with ensuring fair distribution of broadcast service. This process does not apply to television proceedings because fair distribution issues are addressed prior to application by the allotment of TV channels to particular communities in TV allotment proceedings.

7. Most mutually exclusive FM applications for reserved channels (*i.e.*, those not resolved on 307(b) grounds) and all such TV applications will be compared under a point system, in which we assign points to aspects of each proposal and select the applicant with the highest score. We would award points as follows: (a) 2 points for diversity of ownership, *i.e.* if there is no overlap of the principal community contour of the proposed station and any other station attributable to the applicant; (b) 1 to 2 points for the best technical proposal in terms of both area and population served; (c) 3 points for applicants that have been local to the community for at least two years; and (d) 2 points for certain state-wide networks providing programming to accredited schools. In the event of a tie, we would apply several tie breakers, first preferring the applicant with the fewest existing authorizations; and second, the applicant with the fewest pending applications. If applicants remain tied after all of these factors are considered, we would require tied full service applicants to share time equally. Among tied FM translator applicants, we would select the first applicant to file. We would apply these procedures both to pending applications and to applications received in the future.

8. After completion of this process, we would conduct a study of the tentative selectee's application to determine whether it meets all of our standards for acceptability. At that time we would also consider petitions to deny against the tentative selectee only. If the tentative selectee is found qualified in all respects, we would award a permit to that applicant. Applicants prevailing in the point system would be subject to a four-year holding period, permitting the station's license to be assigned or transferred during that period only to an entity qualifying for equal or greater points, and for consideration that does not exceed the assignor's expenses of filing and prosecuting its application and constructing its station's authorized facilities.

IV. REQUESTS FOR RECONSIDERATION AND CLARIFICATION

9. Existing and potential applicants ask us to reconsider or clarify various aspects of our filing and selection processes. A few petitioners question our fundamental choices, for example, advocating the use of lotteries instead of a point system. Most, however, endorse our adoption of a point system, and ask only that we change or clarify a particular portion of our decision. Some have concerns relating only to pending applications or to future applications, while others raise issues potentially affecting all applications. We consider each of these concerns.

⁶ Specifically, an applicant would receive a decisive preference if it would provide first or second NCE aural service to at least 10% of the people within the proposed 60dBu (1mV/m) service contours, but not fewer than 2,000 people. If more than one applicant meets this standard, the differences between their proposals would be considered significant only if one provided first or second service to at least 5,000 more people than the other.

A. Objections to Overall Process

10. Two petitioners object to the point system in its entirety. Broadcasting for the Challenged, Inc., a licensee providing programming for disadvantaged individuals, believes that a lottery would have been far preferable. Broadcasting for the Challenged argues that we did not sufficiently justify our decision not to use lotteries. Educational Media Foundation, which operates a nationwide network of 23 FM stations programmed from a religious perspective, does not advocate a particular alternative but considers our point system discriminatory. It argues that the point system favors some speakers over others, to the detriment of religious broadcasters.

1. Rejection of Lotteries

11. The Commission has authority to use random selection (lottery) procedures to choose among NCE applicants. 47 U.S.C. § 309(i). If we use such procedures, the statute requires us to weight the lotteries to provide substantial preferences to racial minorities and applicants with few other stations. *Id.* We considered using such lotteries, but found that a point system was preferable for several reasons. NCE Order, ¶¶ 11 – 15. We identified the primary benefits of lotteries as speed and simplicity. Against these benefits, we weighed three major disadvantages of lotteries: (1) greater potential for speculation; (2) no assurance of selecting the most qualified applicant; and (3) the likely delay from litigation over the required lottery preferences. We determined that lotteries would achieve only part of our goal to improve the NCE selection process, and thus rejected lotteries in favor of a point system.

12. Broadcasting for the Challenged (“BFTC”) maintains that the Commission has not adequately justified rejection of lotteries, and should have supported each concern with empirical evidence, as it believes is required under *Bechtel*. BFTC disputes each of the three drawbacks that we included in our analysis. It disagrees with commenters concerned that lotteries would produce speculation, arguing that there is little potential for financial gain in NCE broadcasting, and that the Commission eliminated this potential by establishing a holding period. With respect to applicant qualifications, it argues that it is impossible to verify whether one qualified applicant will actually be better than another, and thus that we should consider all applicants as being equal if they meet our basic qualifications. Finally, BFTC does not believe that there is any legal impediment to our use of a weighted lottery, as required by statute, because we previously used such a lottery to select Low Power Television (LPTV) applicants.

13. We are not persuaded to reverse our policy judgment that a point system is preferable to a lottery for the award of NCE permits. First, BFTC’s reading of the requirements of *Bechtel* is overbroad. *Bechtel* holds simply that any predictive judgments used to select among broadcast applicants must have factual support. *Bechtel* does not, as BFTC argues, prevent the Commission from considering concerns presented in comments and applying its expertise to choose a selection method that it determines would best serve the public interest. Here, where both lotteries and point systems (a simplified form of comparative hearing) are presented to the Commission as options by statute, the Commission need not present empirical data to support the viability of either choice. Rather, we must select one of these options, offering a reasonable explanation that is supported by the record.⁷ Then, the value of any predictive factors included within the option selected must be explained and supported, as we did in adopting point factors. Further, BFTC’s suggestion that we erred in considering the potential for lotteries to spur speculation is based on its belief that NCE stations are immune to speculation either because such stations have limited monetary value or because they are subject to a holding period. Speculation, however, is not a concept limited to the

⁷ See *AT&T v. FCC*, 974 F.2d 1351, 1354 (D.C. Cir. 1992).

quick “turn over” of stations for an inflated monetary value, something that our holding period addresses. NCE spectrum is a finite resource, with intrinsic value as an outlet for different educational viewpoints. Lotteries, due to their random nature, encourage mass filings of applications to increase the statistical “odds” that the applicant will obtain any station, anywhere. That too is speculation. Moreover, such practices are harmful to competing applicants because the random selection of an applicant that could have met its goals anywhere will preclude the selection of an applicant that can fulfill its mission in only one location, such as where its campus or school system is located.

14. We cannot agree with BFTC’s suggestion that an applicant’s basic qualifications are all that matter in an educational broadcasting context. The Commission has in NCE broadcasting always sought to select the best applicant, not just any qualified applicant. BFTC provides no reason for us to depart from that policy. Finally, we explained that a decision to use weighted lotteries would likely prompt lengthy litigation, thereby causing significant delays in initiation of new NCE broadcast service.⁸ It is reasonable for us to consider the potential for lengthy litigation in making policy choices.⁹ Our previous use of weighted lotteries in the LPTV service provides no comfort or certainty because those lotteries were held prior to the Supreme Court’s decision in *Adarand v. Peña*, 515 U.S. 200 (1995), when there was a lesser likelihood of a challenge to weighted lotteries.

2. Constitutional Concerns

15. Educational Media Foundation (“EMF”) argues that our point system violates the First and Fifth Amendments to the U.S. Constitution, which limit government intrusion on free speech and on the free exercise of religion, and provide for equal protection under the law.¹⁰ EMF acknowledges that the Commission expressed content neutral and speaker neutral reasons for adopting the point system. Nevertheless, EMF argues that the government’s professed content and speaker neutrality does not necessarily make a rule constitutional, if the rule’s effect is to discriminate against certain speakers or content. Petition of EMF at 21 *citing Turner Broadcasting System, Inc. v. FCC*, 512 U.S. 622, 641-643, 645 (1994). While recognizing that no party has an absolute right to receive an NCE license, but rather has, at most, a right to compete for a license, EMF argues that comparison must be fair and nondiscriminatory. EMF argues that our point system is unfair. It charges that the Commission engaged in results-oriented rulemaking with the explicit intention of discriminating against private speakers airing religious content and in favor of government speakers airing secular content. Thus, it argues that under “strict scrutiny,” we must demonstrate that our point system is narrowly tailored to serve a compelling government interest.¹¹ EMF bases its arguments almost entirely on its conclusion that it and six other

⁸ NCE Notice at 7-8, n. 12 *citing Adarand v. Peña*, 515 U.S. 200 (1995) and *Lutheran Church-Missouri Synod v. FCC*, 141 F.3d 344, *petition for rehearing denied*, 154 F.3d 487, *petition for rehearing en banc denied*, 154 F.3d 494 (D.C. Cir. 1998). See also Telecommunications Research and Action Center v. FCC, 836 F.2d 1349, 1358 (D.C. Cir. 1988)(agency using lotteries must use race-based weightings provided by statute).

⁹ *Omnipoint Corp. v. FCC*, 78 F.3d 620, 633 (D.C. Cir. 1996) (“an agency may properly consider the avoidance of litigation-related delay when revising its rules”).

¹⁰ We note that another broadcaster raised similar arguments in an appeal filed directly with the U.S. Court of Appeals for the D.C. Circuit. See American Family Association, No. 00-1310 (filed July 14, 2000).

¹¹ Petition of EMF at 16-17 *citing FCC v. League of Women Voters*, 468 U.S. 364 (1984); *Police Department of Chicago v. Mosely*, 408 U.S. 92 (1972); and *Shuttlesworth v. City of Birmingham*, 394 U.S. 147 (1969).

religiously oriented NCE broadcasters would not be selected in a point system if competing against government entities. It maintains that because religious broadcasters generally run national networks, do not provide programming to schools, and have many other existing stations and applications, such broadcasters could not likely qualify for points based on localism or state-wide networks, and would not fare well in tie breakers.¹²

16. The Center for Media Education (“Media Education”) disputes EMF’s constitutional arguments. It argues that there is no constitutional right to a broadcast license and that EMF’s reading of *Turner* as requiring strict scrutiny is incorrect. Media Education cites to language in *Turner* which states “such heightened scrutiny is unwarranted when the differential treatment is ‘justified by some special characteristics’ of the medium being regulated.” Media Education Opposition at 4 *citing Turner Broadcasting v. FCC*, 512 U.S. 622, 660-61 (1994). It further states that the Supreme Court traditionally considers broadcast cases under a more relaxed review, due to the special attributes of broadcasting. *Id.* at 5 *citing Reno v. ACLU*, 521 U.S. 844, 868 (1997). In any event, it maintains that because our point system does not require or prohibit the carriage of a particular point of view, it is content neutral, and would be subject to lesser scrutiny. *Id. citing Time Warner Entertainment v. U.S.*, 211 F.3d 1313 (D.C. Cir. 2000). Media Education believes that the implication that the Commission has an “anti-religion agenda” is baseless, as evidenced by the Commission’s grant of large numbers of licenses to religious broadcasters.¹³

17. We do not believe that there is any constitutional infirmity in our point system. Each factor within the point system is speaker and subject matter neutral. If, as EMF claims, it will be disadvantaged by the rules, it is not because the rules favor secular applicants over religiously affiliated applicants. Rather it is because EMF is a national organization that is already the licensee of many NCE stations, while the Commission sought in the rules to encourage localism and diversity of ownership. A secular national organization licensed to operate many NCE stations would have the same disadvantage under the point system. EMF’s religious focus has no bearing on the operation of the rules. In the NCE Order we explained:

We have considered, but disagree with, the minority viewpoint that a credit for localism would adversely impact religious organizations or small organizations. A localism credit is religion-neutral and size-neutral. Whether religious or secular, large or small, an organization based in the local community would qualify for the credit. Moreover, organizations both with and without religious affiliation, and of varying sizes support a credit for localism.

NCE Order ¶52.

18. Because the point system does not reflect a government preference for the content or viewpoint of a particular speaker, strict scrutiny does not apply. See Turner Broadcasting v. FCC, 512 U.S. 622, 656-59 (1994); *Time Warner Entertainment v. U.S.*, 211 F.3d 1313 (D.C. Cir. 2000) (*Time Warner*). A

¹² See Petition of EMF at 19-20.

¹³ Media Education, citing an independent report, states that there are 1,731 radio and 285 television stations licensed to religious broadcasters, of which over 700 radio and 23 television stations are on reserved NCE channels. Opposition of Center for Media Education at 6, n. 3 *citing* Jerold M. Starr, *Signal Degradation*, AMERICAN PROSPECT, Aug. 14, 2000, at 22.

content neutral regulation passes intermediate scrutiny if it advances important governmental interests, unrelated to the suppression of free speech, and does not burden substantially more speech than necessary to further those interests. *Time Warner*, 211 F.3d at 1318. A more deferential standard of review has been applied to broadcast regulation. *See, e.g., FCC v. Pacifica Foundation*, 438 U.S. 726, 748 (1978). Our point system advances important government interests in local broadcasting and education.¹⁴ Further, the point system is not a new burden on any particular speaker, but rather a system that incorporates several longstanding policy goals into one cohesive method for selecting among mutually exclusive applicants. For example, the importance of localism in noncommercial educational broadcasting is longstanding and reflected in the statute. *NCE Order* ¶¶44-51. Similarly, the Commission’s decision to award a permit in the event of a tie to the applicant with the fewest existing authorizations, is consistent with our longstanding focus on diversity of ownership of broadcasting stations. Our decision to award points to applicants that are part of state-wide networks is consistent with our longstanding policy of considering an NCE applicant’s participation in state-wide education plans.¹⁵

19. As EMF acknowledges, there is no constitutional right to a broadcast license. *See Red Lion Broadcasting Co. v. FCC*, 395 U.S. 367, 388-89 (1969). Given the nature of spectrum licensing, our grant of one mutually exclusive broadcast application under any selection method will inevitably mean our denial of another application. Whether our selection decision is made pursuant to a point system or some other method, it is well established that denial of an application for a broadcasting license “if valid under the [Communications] Act, is not a denial of free speech.” *National Broadcasting Co. v. United States*, 319 U.S. 190, 227 (1943).

20. EMF claims that the Commission had some unstated goal to disadvantage religious broadcasters. That is simply not so. Indeed, the record indicates that the Commission was responsive to the concerns of NCE organizations with religious affiliations as well as those without such affiliations. For example, we expanded the definition of state-wide network, which was originally expressed in terms of participation in government educational plans, to also include private networks offering significant service to schools. *NCE Order* at ¶ 59. We indicated that religious organizations that operate schools, such as the Catholic Archdiocese or religious universities, might qualify for state-wide network points. *Id.* at ¶¶ 57-59. Given that our decision concerned award of permits to provide noncommercial educational broadcast service, we believe that it was eminently reasonable to encourage, though not require, service to schools.

21. Accordingly, we reject the constitutional challenges to our use of a point system. Having found that our choice of a point system over other options is sound overall, we now will examine various aspects of our decision to determine whether modifications or clarifications of that system would be useful.

B. Time for Calculating Points/Enhancement of Proposals

22. Generally, the *NCE Order* provided that we would award points for the relative merits of an

¹⁴ *See Turner*, 512 U.S. at 663 (the importance of local broadcasting can scarcely be exaggerated); *Cable Television Consumer Protection and Competition Act of 1992*, Pub.L. 102-385, 106 Stat. 1460, § 2(a)(8)(A) (“[P]ublic television provides educational and informational programming to the Nation’s citizens, thereby advancing the Government’s compelling interest in educating its citizens”).

¹⁵ Consideration of state-wide plans prior to adoption of the point system was codified in Section 73.502 of our rules, stating that “the Commission will take into consideration the extent to which each application meets the requirements of any state-wide education plan for noncommercial educational FM stations. . .” That rule has been superseded by the more specific state-wide network credit. *See NCE Order* at para. 61.

applicant's proposal as of the time of filing, provided that the applicant maintains the qualities for which points are awarded.¹⁶ Several petitioners, including Colorado Christian University and Jimmy Swaggart Ministries anticipate timing concerns not specifically addressed in our decision or rules and request clarification. Of particular concern is how the Commission will view changes that occur after the time of application, such as an applicant's attempt to enhance its proposal or changes in census data that occur naturally over time. This issue is relevant to all NCE proceedings, but is especially of concern to organizations with pending applications.¹⁷ In order to address apparent uncertainties regarding both current and future applicants, we here clarify with more specificity the process for counting points in future proceedings and the similar, but somewhat modified, process that will govern pending applications.

1. Timing for Future Applications

23. In the NCE Order we established the "time of filing" as the time for determining points. We did not provide an in-depth discussion of that choice, however, and we now elaborate in order to clarify our decision. We selected the time of filing so that there would be no need for the staff and applicants to constantly recalculate points and to minimize one-upsmanship. Applicants may not continuously amend their proposals and qualifications in attempts to surpass other mutually exclusive applicants, but rather must present initially, their proposal to provide the best possible service to the public regardless of whether or what any competing applicants may file. An applicant's characteristics at the time of filing establish a "snap shot" that we will generally use to determine the applicant's maximum points and its maximum position in a tie breaker. However, points can be lost through changes that detract from the original proposal.

24. Our rules require applicants to inform us of material changes in their applications after the time of filing, which, in the context of a point system, will include all changes that negatively affect its claimed points and tie breaker position. 47 C.F.R. § 1.65. A future applicant's maximum points and its standing in a tie breaker can thus go down, but not up as a result of changes made after filing. For example, if an applicant loses its transmitter site and amends its application in a way that results in lost points, the applicant will only be allowed to claim the amended points. In this way, the applicant will not benefit from any early proposals that it is unable to honor. However, if the applicant amends and attempts to enhance points, the applicant will only be allowed to claim its earlier lesser points. In this manner, applicants with superior initial proposals will not be disadvantaged by any competing applicant's later attempts at enhancement. This will also encourage applicants to come forward with the best possible proposal and minimize the potential for any manipulation of the system. In addition, we believe that a proposal crafted without knowledge of competing proposals is a more reliable indicator of future service than one crafted with an eye to outdoing a competing applicant.

25. Similarly, for tie breakers, the applicant's best position is established at the time of application, but can be reduced. For example, in our primary tie breaker, which selects the applicant with the fewest number of broadcast authorizations at the time of filing, an applicant cannot enhance its position by selling one of its existing stations, but can diminish its position by acquiring an additional station. Thus,

¹⁶ See 47 C.F.R. § 73.7003 (localism points and tie breaker factors considered as of date of filing); NCE Order, Appendix A (technical parameters considered as of close of filing window); NCE Order at ¶ 40 (technical factors must be maintained).

¹⁷ Currently pending are 1,369 reserved channel radio applications and 67 reserved channel television applications.

an applicant with no existing stations at the time of application will benefit from its “zero” stations in tie breakers only until such time as it receives a first authorization. It will be required, pursuant to 47 C.F.R. § 1.65, to update its pending applications and so will not be able to continue claiming zero authorizations, when it has, in fact, already had applications granted in several proceedings, perhaps now surpassing a tied competing applicant in terms of stations authorized.¹⁸

26. When future applicants report population and other stations serving an area, as they might for fair distribution purposes under 47 U.S.C. § 307(b),¹⁹ they should use the data that is the most current at the close of any filing window. It is inevitable that there will be shifts in population and in number of services authorized in a region between close of a window and the time we act on an application. However, such inevitable changes will not reduce a future applicant’s standing, and thus we will not require such applicants to notify us if these expected changes occur after the close of the window. Of overall concern to us in this area is that we are comparing applications that use the same data. Reliance on information as of the close of the window will ensure that applicants have essentially a common reference date. With a common reference date and a common method of calculating population²⁰, the staff will analyze applicants on a similar basis.

2. Timing and Enhancement for Pending Mutually Exclusive Applications

27. Applicants with pending applications filed prior to adoption of the point system must supplement their application to provide us with additional information needed to consider their applications under the new comparative standards. As we will be unable to consider any pending application that does not contain the new information, we will assume that any applicant that fails to file a supplement is no longer interested and dismiss its application.²¹ We now clarify the procedures for filing these supplements, which will depend upon whether the applicant is in a group that is considered “closed” or “open” in terms of whether it is subject to future competition from additional parties.

a. Closed Groups

28. Due to a processing freeze that has been in place while we establish and review the NCE

¹⁸ Under 47 C.F.R. § 1.65 an applicant has an obligation to report any material changes in its pending application. For example, with respect to authorization count, which can change frequently, applicants must update their applications upon occurrence of a change that could reduce their position. We stress that the applicant has an affirmative Section 1.65 obligation to report any change potentially affecting their eligibility for points or position in a tie breaker, even with respect to matters on which the Commission itself has acted.

¹⁹ See ¶ 6 *supra*.

²⁰ Population will be calculated using a block level centroid retrieval method, in which the applicant uses “centroid” points representing population at designated coordinates as identified by the U.S. Census Bureau, to determine the population within the applicant’s proposed service area. See *NCE Order* at ¶¶ 26 and 40.

²¹ However, the failure to file a point supplement because the applicant has instead filed a settlement consistent with paragraphs 96 to 99 *infra* will not result in dismissal. Only in the event that the settlement is denied, and the applicant thereafter fails to file a supplement by a new date would such failure to file a settlement result in dismissal.

comparative criteria,²² there are some groups of mutually exclusive applications which have been pending for a considerable time, and which are no longer subject to additional competing applications. These groups are referred to as “closed” groups. As stated in the NCE Order, existing applicants in these “closed” groups will need to file supplements to claim points so that we can compare them under the new system. We delegated to the Mass Media Bureau responsibility to announce the procedures for filing these supplements. We did not specify whether longstanding applicants might enhance their proposals and claim points for changes made in response to the NCE Order. Colorado Christian University asks us to “freeze” an existing applicant’s points at a particular point in time, to avoid the potential for pending applicants to become “moving targets.” Jimmy Swaggart Ministries suggests that we examine an existing applicant’s points as of the date of application to avoid uncertainties associated with applications that have been pending for a considerable time. For example, it argues that, for purposes of our fair distribution analysis, which considers whether applicants will provide a first or second NCE radio signal to an underserved area, pending applicants that proposed first or second service at the time of application should benefit, even if the Commission since has authorized additional stations.

29. Educational Media Foundation notes that, for some pending closed mutually exclusive groups, we have not issued B cutoff notices.²³ EMF further notes that under the A/B cutoff procedures that existed prior to adoption of the point system, applicants could amend as a matter of right until issuance of a “B” cutoff notice, and the Commission considered these amended proposals, rather than the original proposals, in comparative hearings. See 47 C.F.R. § 73.3522(b). Based on this line of reasoning, EMF believes that we should permit all types of enhancing amendments to existing applications, including technical amendments. The National Federation of Community Broadcasters argues that, with respect to changes in technical proposals, applicants should only be able to enhance their points by making changes considered “minor” under our rules.

30. We have attached as Appendix D a list of closed mutually exclusive groups, *i.e.* groups in which we issued an “A” cut-off list under the old rules and for which the time for filing responsive, competing applications has closed. Most of the point principles enunciated above for future applications will govern our treatment of applications in these pending “closed” groups. However, we will make several adjustments to account for the fact that these older applications did not contain point information as filed, and that applicants must now file supplements to claim points. To the extent possible, we will use a recent date for purposes of taking a “snap shot” of applicant qualifications. As a result, we will be able to consider recent information rather than information that may be several years old. A recent “snap shot” date will also give pre-point system applicants an opportunity to incorporate into their proposals point factors that we adopted and clarified after their original filing date, and which we have since indicated are desirable and in the public interest. Specifically, the date that pending applicants must use for reporting

²² See Public Notice, *FCC Freezes Comparative Hearings*, 9 FCC Rcd 1055, *modified*, 9 FCC Rcd 6689 (1994), *further modified*, 10 FCC Rcd 2877, 2879; 10 FCC Rcd 12182 (1995).

²³ Under the former A/B cutoff procedures, the staff issued an “A” list announcing the filing of an initial “A” application. That list established an “A” cut-off date, 30 days later, by which any applications competing against the “A” application were due. If the staff, after study, determined that competing applications were received, it would issue a “B” list, identifying all mutually exclusive applications and inviting petitions to deny. However, given that the current proceeding proposed to change the criteria used to evaluate competing applications, issuance of “B” lists inviting petitions under the old criteria would have been an inefficient use of resources both for the staff and potential petitioners. Therefore, among the applications on file, are closed groups of applications for which no “B” list was issued.

population/service data for 307(b) determinations and for most point data is the “supplement date,” a date after release of the current decision that the staff will announce by public notice, and by which pending applicants must file supplements to claim points. By the supplement date, applicants in closed groups must file either settlement agreements, as discussed *infra* at paras 96-99, or supplements. Those filing neither will be dismissed. We will use the supplement date to examine all data, except for the applicant’s technical proposal, for which we will use the earlier date discussed further below. So as not to unduly delay this proceeding, the staff should set a due date for supplements that is approximately 30 days after the public notice. The staff will evaluate any non-technical changes to an applicant’s proposal pursuant to the criteria established in the point system. For example, if an applicant unconditionally withdraws previously filed applications or consummates approved assignments of authorized stations to other entities prior to the supplement date, those stations would not count against the applicant for purposes of a tie breaker, regardless of how many applications or authorizations they may have held at the time of original application.²⁴ An applicant that changed its board composition or established a local campus in response to our point system, however, would not be able to claim points as an established local applicant because our point system recognizes such local indicia only if they have been maintained for at least two years.

31. With respect to the applicant’s technical proposal, we will calculate points based on an earlier date. We are compelled to reach this result because the staff has already fully studied all applications in closed groups based on earlier claimed coverage to determine which applications are mutually exclusive. Technical changes now would cause undue delay, requiring reexamination of new technical proposals for potential conflict with over a thousand applications on file, not just with respect to other applications within each closed group.²⁵ For closed groups in which both “A” and “B” cut-off notices have issued, we will calculate technical points as of the date of the “B” notice, which announced applications in the mutually exclusive group and cut off the opportunity to file amendments as of right under the rules then in effect. Thus, these applicants will have the same amendment as of right period that they would have received under our previous rules. For closed groups in which no “B” cut off notice has issued, we will examine technical proposals as of April 21, 2000, the release date of the NCE Order. We ceased issuing “A” and “B” lists as of that date. Applicants in this category will thus also have had some time to make technical amendments as of right, albeit less than they might have received had the Commission not eliminated its use of cut-off lists. After the relevant date, applicants may not amend their proposals except for good cause pursuant to 47 C.F.R § 73.3522(b), such as an applicant’s involuntary loss of its transmitter site. With respect to good cause amendments, applicants will not receive additional points, and may lose points for

²⁴ Applicants may not enhance their position based on matters that require additional Commission or applicant action. For example, they must consider as pending any applications for which their requests for withdrawal are conditioned on our approval of a settlement agreement. Similarly, they must include as existing authorizations any station for which an assignment of license has not yet been consummated, even if an application to assign has been filed or approved.

²⁵ To ensure efficient processing of NCE FM applications, we waive the city grade coverage requirement recently adopted in MM Docket No. 98-93 for all mutually exclusive radio applications subject to the comparative procedures adopted herein. Absent a waiver, these radio applicants would have been required to amend their applications by February 19, 2001 to provide a predicted 60 dBu strength signal to at least 50% of their communities of license or to 50% of the population of the community. *See Streamlining of Radio Technical Rules*, MM Docket No. 98-93, FCC 00-368, ___ FCC Rcd ___ (released November 1, 2000), 65 Fed. Reg. 79773 (December 20, 2000). Moreover, we will not accept amendments to those applications filed under the “good cause” standard where such amendments are intended to establish compliance with the new community coverage requirement. We note that petitions for reconsideration of this issue were filed in MM Docket No. 98-93, and we will act on those petitions in a subsequent order in that proceeding.

any such amendments that decrease the applicant's proposal. A technical amendment that removes a mutual exclusivity, thereby permitting our grant of an application, would be considered a good cause amendment.

32. We do not agree with Jimmy Swaggart Ministries that we should use data that dates back many years in analyzing fair distribution issues for applicants in closed groups. Traditionally, in examining fair distribution pursuant to Section 307(b) of the Communications Act, proposals are analyzed as of the date that 307(b) information is requested. For many NCE applicants, we have not yet requested any 307(b) information. It would not be appropriate or practical to ask such applicants to now submit such information as of a date long passed, because this would require applicants to undertake a more difficult process in order to provide the Commission with less accurate information. For some other NCE applicants, we may have requested 307(b) information in hearings that were conducted under old standards and that were not dispositive. In the NCE Order we established new standards for conducting Section 307(b) analyses, and any information submitted under the old standards would be inadequate or incomplete under the new standards. Thus, even applicants that previously submitted 307(b) information will need to submit different 307(b) information as of the "supplement date." Accordingly, the supplement date will serve as the "snap shot" date for 307(b) information. Applicants supplementing their applications with population data should use the 2000 census, if available by the supplement date.

b. Pending Applications Subject to Future Competition

33. West Coast Public Radio ("West Coast") seeks special consideration for a specific type of pending application, *i.e.*, those that are still subject to competing applications because they were neither filed in response to an "A" notice nor themselves placed on an "A" notice. We stated in the NCE Order that, because the opportunity to file competing applications has not yet run, we will consider these pending applications in the first filing window, along with any additional applications filed during that window. This result creates a timing issue with respect to when to calculate the points of the pending applications and the future applications with which they will be competing.

34. West Coast is particularly concerned that future applicants filing in the first window may attempt to tailor mutually exclusive proposals to claim more points than existing applicants who must also compete within that window. West Coast bases this belief on the assumption that existing applicants will claim points as of their original date of application, whereas the future applicants with whom they will compete will be able to claim points as of a date within the window. It suggests that we award additional points to the existing applicants so that they will be able to compete effectively with future applicants. We decline to do so. We clarify, however, that such existing applicants may be able to claim more points than those for which they qualified at the time of their original application. They have two options available to them. First, they may choose to amend their pending applications during the first filing window to enhance their proposals and provide comparative information. Alternatively, they may withdraw their pending applications prior to the first filing window and file new proposals in the first filing window. In either case, existing applicants that are subject to competition will have the same opportunity as new applicants to submit their best proposals during the first filing window.

C. Fair Distribution of Service as a Threshold Issue (Radio Only)

35. Several parties ask for clarification of our fair distribution process. We decided in the NCE Order that, if mutually exclusive NCE radio applicants specify different communities, we would first consider, pursuant to Section 307(b) of the Communications Act, whether grant of one proposal over the other is warranted based on fair distribution of service principles. An applicant would receive a decisive preference, as a threshold matter, if it would provide a first or second NCE aural service to 10% of the

people within the proposed station's 60dBu contour, but to no fewer than 2,000 people. If more than one applicant meets this standard, we would award a preference only if one proposal provides first or second service to 5,000 more people than the other. This standard is similar in some respects to the 307(b) standard previously applied in traditional NCE hearings, but borrows some factors used in the 307(b) analysis of commercial applications.²⁶ To maintain the benefits of fair distribution, we stated that applicants selected based on NCE fair distribution standards would not be permitted to downgrade service to the area on which the credit was based. Because applicants chosen through fair distribution would not be subject to a point system, however, they would not be subject to four year holding period provisions, which require applicants to maintain factors for which they received points and limit the terms on which the applicant may transfer the station to another party.

36. Jimmy Swaggart Ministries argues that the fair distribution analysis should be expanded to all mutually exclusive applications, not just those proposing to serve different communities. In contrast, Station Resource Group ("SRG"), an association representing NCE licensees, argues that 307(b) considerations should be given lesser importance, examined as part of a point system, and not as a threshold issue. SRG argues that Section 307(b) of the Communications Act does not compel us to consider fair distribution as a threshold issue, and maintains that in traditional comparative hearings this factor was given less weight.

37. The scope of our fair distribution analysis was an issue fully considered in the NCE Order. By the express terms of 47 C.F.R. § 73.7002(a), adopted therein, the 307(b) analysis is conducted only if applicants propose to serve different communities. Differences in coverage among proposals to serve the same community are adequately considered within the point system, which includes a consideration of technical parameters. Differences in area and population served within the same community are considered by awarding points for technical parameters. *See also* paras 75-76 *infra*. Our decision is entirely consistent with our responsibility under Section 307(b), as long interpreted by the courts and the Commission. The statute is explicit that the Commission must distribute broadcast licenses "among the several States and the communities so as to provide a fair, efficient, and equitable distribution of radio service to each of the same," but does not mandate a particular procedure that the Commission must follow. *See Competitive Bidding*, 13 FCC Rcd 15920, 15963 (1998). While Swaggart urges us to expand the 307(b) threshold to encompass all applications with different reception areas as well as different communities of license, nothing in the language of the statute, with its explicit reference to "communities" supports such an extension. Nor does Swaggart cite any Commission-level precedent in which any applicant received a preference for such matters. The Commission's use of a threshold 307(b) determination in NCE cases was thus fully consistent with the statute, as interpreted by the Commission and the courts. *FCC v. Allentown Broadcasting Corp.*, 349 U.S. 358 (1955); *Pasadena Broadcasting Co. v. FCC*, 555 F.2d 1046 (D.C. Cir. 1977); *Competitive Bidding*, 13 FCC Rcd 15920, 15963 (1998).

38. With respect to the question of whether to consider fair distribution individually or to integrate it into a point system, we concluded that we should give this factor decisive weight prior to any point system. NCE Order at ¶ 24. There is no merit to SRG's suggestion that our approach is inconsistent with

²⁶ To the extent that the 307(b) standards we will use for NCE stations are more stringent than those applied to commercial stations, we noted that areas underserved in terms of NCE service are not likely to be true "white" or "gray" areas, because areas with few NCE signals will likely receive additional service from commercial stations. NCE Order at n. 16. We also noted that the outcome of a successful 307(b) analysis in commercial TV and FM proceedings is the allocation of a channel to a community but not to any particular licensee, whereas in an NCE analysis the outcome is award of a license.

agency precedent. It relies on *New York University*, 10 RR 2d 215 (1967), the first NCE comparative case. SRG alleges that the modified hearing designation order in that case afforded the Administrative Law Judge discretion to give whatever weight he deemed appropriate to the 307(b) issue and that the judge did not give that issue dispositive “threshold” weight. However, the Review Board’s subsequent opinion in that case makes clear that 307(b) issues can be dispositive, as long as the differences are not slight, as they were in that proceeding. *New York University*, 19 FCC 2d 358, 370-71 (Rev. Bd. 1969). By means of the formula prescribed in 47 C.F.R. § 73.7002(b), we have ensured that only significant 307(b) differences are decisional, just as the Review Board envisioned in *New York University*. When two applicants have only small differences under 307(b), we proceed to consider them pursuant to a point system. Differences among applicants for the same community are considered under the point system’s technical factor, if significant in terms of both area and population.

39. We do, however, note that our discussion of 307(b) in the NCE Order did not contemplate the possibility that two applicants offering similar levels of new NCE service pursuant to 307(b), and therefore proceeding to consideration under a point system, could be part of a larger mutually exclusive group with applicants proposing to provide service not deserving a 307(b) preference or deserving a lesser 307(b) preference. We clarify that under such circumstances, only the applicants that are entitled to equal Section 307(b) preferences will proceed to consideration under a point system.²⁷ The other applications, which are entitled either to lesser or no preferences under Section 307(b), will not be considered along with those applicants in a point system, consistent with our determination that fair distribution of service should be given decisive weight.

40. Colorado Christian University asks whether the new fair distribution standard developed for NCE stations will be based only on first or second service received or also, as in commercial allocations proceedings, on first transmission service licensed to a community. It is concerned about potential abuses that may occur if first licensed transmission service is applied in an NCE context. Station Resource Group also shares this concern. It believes that an applicant proposing to provide a first or second NCE reception service is providing a more important service than an applicant merely licensed to a community. In particular, SRG observes that under the rules applicable at the time of its comments, reserved channel NCE-FM stations had no obligation to place a city grade contour over their nominal communities of license, and could designate any community within the 60dBu contour as the community of license.

41. The fair distribution standard that we adopted was based only on provision of the first or second NCE reception service for a significant population. Applicants would receive no preference by proposing the first station to be licensed to a city or town, when that community already receives two or more NCE signals. First aural service licensed to a community is considered in commercial broadcasting, which has longstanding community coverage requirements, but has not played any significant role in NCE broadcasting which until recently had no community coverage requirements and now has requirements that are significantly less stringent than those applicable to commercial broadcasters.²⁸ We do not believe that

²⁷ For example, in a group of three applicants serving different communities, if two of the applicants would provide first NCE service to similarly sized populations, while the other applicant proposes only a second or third NCE service, we would conduct a point “hearing” only among the applicants proposing first service. We would dismiss the third applicant because either one of the remaining applicants would have prevailed over that applicant in a 307(b) determination.

²⁸ NCE FM stations must provide a predicted 60 dBu signal to at least 50 percent of the area or population of the community of license, whereas commercial stations must provide a 70 dBu signal to the entire (continued....)

consideration of first service licensed to a community would serve the same purpose in NCE broadcasting as it does in commercial broadcasting. Further, as commenters stated earlier in this proceeding, our crediting only service received reduces the potential for abuse. Otherwise, NCE applicants might identify small communities that they would not fully serve, receiving a decisive preference over applicants with nearly identical service areas but that propose to be licensed to larger communities. NCE Order at ¶ 22. Accordingly, our NCE fair distribution analysis is based on new service received, not on first transmission service licensed to a particular community.

42. Next we consider the views of Munn-Reese Engineering Consultants and the University of Northern Ohio, which ask us to clarify whether, for purposes of our 307(b) analysis, stations operating noncommercially in the non-reserved portion of the FM band or in the AM band will count as NCE aural signals received. If so, they ask what factors we would use to determine whether such a station provides NCE service. Munn-Reese notes, for example, that although stations can operate noncommercially in the non-reserved portion of the band, some are licensed as commercial stations subject to filing fees, while others are licensed as noncommercial stations and are exempt from filing fees.

43. In determining whether a significant population receives NCE aural service, *i.e.*, whether it is unserved or underserved by existing NCE stations, we will count as first and second signals only reserved channel NCE-FM stations. Historically, the Commission has only considered stations operating on reserved channels to determine the level of NCE service already received, and we see no reason to change that practice in this context. See New York University, 10 RR 2d 215 (1967). As we noted in the NCE Order, stations operating on non-reserved channels voluntarily choose to provide NCE service, but can readily become commercial stations by filing a simple form with us. In contrast, noncommercial service on reserved channels is mandatory and permanent. Due to this potential for rapid change in the nature of non-reserved channel stations, we do not believe that the NCE service provided by these stations is sufficiently fixed to be counted in our analysis. Thus, in an NCE fair distribution analysis, we would grant an application proposing to provide the first reserved channel FM service a preference, without regard to whether nearby AM and non-reserved channel FM stations currently operate with noncommercial educational formats.

44. Colorado Christian University raises additional fair distribution concerns, asking us to apply all aspects of our four-year holding period to applicants receiving their permits as a result of a fair distribution preference. Colorado Christian acknowledges that we already prevent technical downgrades to the area on which we granted a fair distribution preference, but believes that other holding period restrictions should apply as well. It argues that there is the need to prevent speculation by all successful applicants, not only those awarded by a point system. It further maintains that because an applicant receiving a 307(b) preference has a decisive advantage over other applicants, it is especially important to hold such applicants to every part of their proposals. We disagree with this reasoning. To uphold the integrity of the point system and prevent speculation, we require each point system selectee to operate the station for four years either itself or by assigning the station to another party with equivalent point credentials for consideration not to exceed reasonable expenses. If an applicant is selected on the basis of fair distribution criteria, its point claims are not relevant and are never examined. Thus, a requirement that any successor in interest have “equal points” would not be especially meaningful and not necessary to preserve the integrity of our process. We believe that it would be overly restrictive to require applicants to maintain attributes for which they claimed points if those attributes are not decisional. What matters in the

(Continued from previous page) _____
community of license. See Streamlining of Radio Technical Rules, MM Docket No. 98-93, FCC 00-368, ___
FCC Rcd ___ (released November 1, 2000). See also note 25 *supra*.

fair distribution context is that any successor in interest continues to provide service to the area for which the original applicant received its fair distribution preference, as our current rules already require. The particular weight given to 307(b) considerations does not in itself justify placing additional non-307(b) obligations on the applicant.

D. Point System Factors

1. Established Local Applicants

45. Our point system awards the largest percentage of points to established local applicants. Initially, we expressed concern that awarding credits in a point system for an applicant's local characteristics might be difficult to support under the standards enunciated in the *Bechtel* case. As discussed previously, that case invalidated the use of the "integration" credit, which awarded a significant comparative advantage to commercial broadcast applicants proposing to work at their proposed stations as owner-managers. The court found that there was no empirical evidence supporting the use of this criterion. We reexamined our concern, however, in response to strong commenter support for localism points, including some that provided statistical and historical evidence of the important role that localism plays in educational broadcasting. Ultimately, we found the comments sufficiently convincing that we chose localism as the single most important factor in our NCE point system. Under the point system, an applicant that has been local for at least the two years immediately preceding application, *i.e.*, that has continuously maintained its headquarters, campus, or the primary residences of 75% of its board members within 25 miles of the central coordinates of its community of license, receives three points out of a possible seven. We stated that governments would be considered local within their areas of jurisdiction.

46. Broadcasting for the Challenged (BFTC) argues that the Commission's decision is contrary to *Bechtel*. According to BFTC, our decision was not supported by empirical evidence that an applicant that is local before filing an application is superior to an applicant that becomes local after its application is granted. In response to the Commission's reliance on the 1967 Carnegie Report as historical evidence, BFTC argues that the Report's use of the term "local stations" did not mean only those built by local groups.²⁹ It maintains that a national group can build a local station and become very involved in the community. Similarly, Educational Media Foundation maintains that there is no nexus between where a station's board members live or where its headquarters is located and the type of programming it will carry. It notes, for example, that the Commission has not set any required amount of time that a local licensee must devote to locally produced programming or local issues. EMF argues that the Commission should not favor local broadcasters based on a belief that national NCE broadcasters can apply elsewhere, because national NCE broadcasters will likely be competing against a local broadcaster in every market.

47. We affirm our decision in the NCE Order regarding localism for the reasons discussed therein. In brief, a localism credit is fully consistent with the *Bechtel* court's concerns. Commenters provided convincing empirical evidence of public benefits resulting from localism in NCE broadcasting.³⁰ They also demonstrated that localism is a factor that has historically been considered the lynchpin of excellent NCE service because local NCE licensees are knowledgeable of the community's educational needs, responsive,

²⁹ In describing to Congress the vision for educational television, the Carnegie Report identified "local stations," as having the "heart of the system . . . in the community," and maintaining "a firm grasp on the nature and needs of the people it serves." NCE Order at ¶ 44.

³⁰ See NCE Order at ¶ 47 citing *Joint Comments of National Public Radio, Association of America's Public Television Stations and the Corporation for Public Broadcasting*.

and accountable to the community.³¹ In response to EMF's concern, we clarify that being knowledgeable and responsive does not necessarily require that a local NCE licensee must air programs produced by local citizens, especially if, in the informed judgment of the licensee, other programs are better suited to meeting the station's educational goals. Local organizations are, however, more likely to be aware of locally produced programs that are available and thus to consider such programs. We do not imply that a non-local organization that receives a broadcast authorization and begins operating within a community may not, with time, acquire the knowledge of the community to be responsive to its educational needs and to become such a part of the community as to have local accountability. But an organization that has already been local for two years or more, as required for the credit, has those qualities prior to its very first broadcast and can thus "hit the ground running." We also continue to believe that it is efficient to meet the spectrum needs of NCE applicants in the local areas surrounding their headquarters and campuses because distant locations may be unsuitable for their needs. In observing that some non-local applicants with broad goals will be able to apply elsewhere if they do not prevail in a particular community, we indicate merely the additional opportunities available to such applicants. We do not, as EMF indicates, assume that it will always be easy for such applicants to prevail elsewhere. Finally, we stand by our decision to award 3 out of a possible 7 points to established local applicants. This weighting reflects the importance of localism in NCE broadcasting. Further, as we noted in the NCE Order, this proportion is similar to one used in the Instructional Television Fixed Service, another educational communications service in which localism is strongly encouraged.

48. Having affirmed our three-point credit for established local applicants, we next consider the proposal of several petitioners that we broaden the class of applicants that would be considered local. West Coast Public Radio and Station Resource Group both ask us to expand the measure by which an applicant's headquarters, campus, and board members are considered local, replacing our 25-mile standard with a 100-mile benchmark. According to West Coast, the 25-mile standard is used as a basis for main studio location³² but only because of concerns about studio accessibility, and does not necessarily reflect what the community considers local. It states that TV and Class C FM stations may cover as much as 50 miles. The National Federation of Community Broadcasters ("NFCB") similarly proposes a standard of localism based on each station's coverage area, noting that rural stations may serve larger areas than urban stations.

49. West Coast and SRG both also ask us to incorporate into 47 C.F.R. § 73.7000 the concept that government applicants are local within their jurisdiction. Real Life Educational Foundation proposes that an organization should be considered local if a majority (instead of 75%) of its board consists of local residents, because control rests with a majority of the board. It further asks us to clarify whether a new organization would qualify for points if board members who have been local for two years form it. Real Life maintains that we should give credit to long time residents regardless of the length of time that their organization has been in existence, arguing that to do otherwise is arbitrarily giving credit only for "brick

³¹ In this sense, we clarify that NCE licensees and the stations they operate, may be viewed as similar in many ways to school boards and the schools they operate. Our nation's schools are primarily locally controlled, with each public school board or private board of trustees having sufficient knowledge about its respective communities to run schools in a way that responds to that community's educational needs. Indeed, such boards have vested interests in being responsive because they will be held accountable to their communities for schools that do not live up to their community's standards.

³² See 47 C.F.R. § 73.1125(a)(3) (establishing 25 miles from the reference coordinates of the center of the community of license as one of three acceptable locations for a broadcast station's main studio).

and mortar.” Real Life also asks us to clarify how we will apply our localism criteria to organizations that have had applications pending for substantial periods.

50. We affirm but clarify the standards for localism announced in the NCE Order. Applicants with a headquarters, campus, or 75% of board member residences within 25 miles of the reference coordinates of the community of license will be considered local. Governmental units will be considered local as well within their areas of jurisdiction. In the NCE Order, we specifically rejected as too broad a proposal to use 100 miles rather than 25 miles as our localism standard. We continue to view 25 miles as a reasonable distance applicable to all full service NCE broadcast stations for the reasons discussed therein. We decline to individualize the definition of “local” to vary with a particular station’s technical capabilities, finding it preferable to apply uniform mileage standard. In this manner, an applicant needing to replace a resigning member of its local governing board will be able to make that decision based on easily understood mileage standards, without having to determine how the technical capabilities of the proposed station affects the localism of the new board member. The only instance in which the NCE Order individualized localism standards concerned governmental entities, in recognition of their broad accountability throughout their areas of jurisdiction. Due to recognizable extrinsic factors, such as where a person pays taxes and what school district he lives in, the government entity can readily identify whether board members live within the area of jurisdiction. As several petitioners note, however, our stated policy that governments are considered local throughout their jurisdiction was not incorporated into any rule. We agree that it would be useful to codify this policy into a rule, and hereby modify Section 73.7000 of our rules accordingly.

51. We disagree that it is too stringent to require an applicant without a local headquarters or campus to have 75% of its governing board members comprised of local residents to qualify for localism points. The Commission has discretion to exercise judgment in setting thresholds and drawing appropriate lines. Attribution of Broadcast and Cable/MDS Interests, MM Docket No. 94-150, 14 FCC Rcd 12,559, 12,590 (1999). We acknowledge that a percentage as low as 51% could constitute a voting majority and therefore exercise legal control of an organization. That is why we permit NCE television applicants that are not governments or schools to establish their basic eligibility by demonstrating that a simple majority of their board is composed of representative community elements.³³ Our point system, however, must distinguish between minimally qualified applicants and exceptionally qualified applicants. Reducing our comparative standard to a 51 % local board would, in the case of television applicants, result in the award of points to all minimally qualified applicants, making the localism credit meaningless in television proceedings. Further, we believe that it is reasonable to require a high level of local Board membership - a super-majority rather than a bare majority - to qualify the applicant for a preference as an established local applicant. In our judgment, an NCE applicant Board comprised of 75% established local residents is likely to be familiar with local needs and interests, and also have extensive ties to the community that will facilitate continuing interaction with the community. Equally important, that level of local Board membership is likely to assure a sufficient level of influence and control over policies and direction of the licensee such that the local Board members' familiarity with local needs and interests and continuing interaction with their community will be reflected in the station's policies and programming. With a 75% local Board, local members are likely to control station decisions even if one local board member is absent or abstains from a particular decision. Finally, we note that it is far easier for an applicant to establish local credentials by appointing local residents to its board than by maintaining a physical presence by

³³ See Ascertainment of Community Problems by Broadcast Applicants, 41 Fed. Reg. 1372, 1384 (January 7, 1976). Although we no longer require formal ascertainment, the elements articulated in a “community leader checklist” continue to be used to determine whether NCE television applicants are broadly representative. See NCE Notice at n.27.

means of a school or headquarters. Thus, there is a greater potential for abuse of the point system among applicants that establish their credentials by appointing local board members. Requiring 75% local board members, rather than a mere majority, reduces the potential for abuse of our process. Thus, we decline to reduce the level of local Board membership required to qualify for points as an established local applicant where the applicant has no local school campus or headquarters and is not a local government authority.

52. With respect to new organizations formed by local citizens, an organization in existence for less than two years prior to our “snap shot” date may be “local” but cannot be considered “established.” Thus, it would not receive points as an “established local applicant.” Comments received earlier in this proceeding indicated a concern that if the Commission did not set a minimum period of time for which an organization itself must be local, non-local organizations would likely engage in abuse by “renting” local citizens for their boards, or by setting up new local corporations with “straw-men” local incorporators. It would be too difficult without a lengthy hearing process for the Commission to distinguish between such abusive “local” applications, and legitimate local applications. Thus, in adopting the requirement that organizations be “established” in the NCE Order, we stated that this requirement would serve to limit the feigning of local qualifications, to establish the applicant’s educational credentials in a particular locality, and to foster participation by truly local entities in noncommercial educational broadcasting. Accordingly, we affirm our decision to grant localism points only to organizations that have been established in the community for at least two years prior to application, similar to the standard adopted for Low Power FM applications.³⁴ Regarding applications currently on file, the applicant must have qualified as a local applicant continuously for two years prior to the supplement date to be considered for points as an established local applicant. It cannot claim such a credit now by virtue of adding local citizens to its board, regardless of the length of time those citizens have lived in the community.

2. Technical Parameters

53. We adopted a credit for the applicant with the best technical proposal. Specifically, we determined that the applicant proposing to cover the largest area and population of all those in a mutually exclusive group would get 1 point if its proposed area and population is 10% greater than the next best proposal or 2 points if 25% greater than the next best proposal. Connecticut College Broadcasting Association asks if and how this standard will be applied to applications seeking modifications of existing facilities. In particular, it asks whether, among two applications for major modification, we would compare only the newly proposed coverage of the stations or their total coverage areas (existing coverage as well as proposed).

54. We clarify that factors in the point system are applicable to applications for major modifications of existing stations as well as to applications for new stations. When we examine a station’s technical parameters, we will focus on the applicant’s proposal. For modification applications, the proposal is the area of newly added service only. For new stations the proposal is the entire area to be served by the new station. We recognize that, as so viewed, a proposal for new service is much more likely to receive points for its technical parameters than a competing proposal to modify existing facilities. This result is consistent with our desire to provide additional service to as many people, living in as broad an area, as possible. Specifically, our grant of an application to construct a new station will bring a new signal to the entire area and population within the new station’s service area, whereas our grant of a major

³⁴ *Creation of Low Power Radio Service*, MM Docket No. 99-25, *Report and Order*, 15 FCC Rcd 2205, *mod’d on other grounds, Memorandum Opinion and Order*, 15 FCC Rcd 19,208 (2000).

modification brings new service to only a portion of the population within the modified station's service area.

3. Diversity of Ownership

55. Our point system awards two points for local diversity, *i.e.*, if the proposed station's principal community (city grade) contour³⁵ does not overlap such contours of any other station in which the applicant, its parent, subsidiaries, or members of their governing boards, have any attributable interests. We stated that this point factor would enable the listening public to receive the viewpoints of different NCE broadcasters. We recognized that the governing boards of NCE entities change frequently, and that differences in attributable broadcast interests of incoming and outgoing board members create an uncertainty about whether an organization that qualifies for the credit today will be able to maintain diversity into the future. Accordingly, we stated that we would award credit for diversity only to applicants whose own governing documents require that diversity of ownership is maintained.

56. Two petitioners ask us to clarify the governing document requirement. First, Jimmy Swaggart Ministries asks us to clarify whether pending applicants can amend their governing documents now, and thus be considered for diversity points even if their governing documents did not contain such provisions at the time of application. As established above, for pending applicants, we will calculate the applicant's maximum points as of a "supplement date" to be announced by public notice. A pending applicant can claim points for diversity if, as of that supplement date, it has no stations with overlapping principal community contours, and it has included in its governing documents a provision to maintain that diversity in the future.

57. Next, we consider a question from the University of Kansas ("Kansas"), which asks us to clarify how an organization without traditional governing documents will be able to meet the governing document requirement. This question is relevant both to pending and future applicants. Unlike NCE corporations, governed by a constitution and bylaws that members or a board can readily amend, Kansas is organized by a state charter passed in 1863, and its operation is, in part, governed by state statute. Kansas maintains that any change would require an act of the state legislature. It requests an exemption from the governing document safeguard, and offers instead to certify that it will not apply for any facilities that create contour overlap with other facilities for which it has applied or has been authorized. It would agree that any failure to meet this requirement would result in dismissal of its future applications. It further argues that the governing documents provision is overbroad, because it could prevent applicants from applying for stations in proceedings where it is not seeking any diversity credit.

58. The governing document safeguard aims to maintain governing board characteristics for which the applicant received credit, even if the composition of that board and its attributable broadcast interests change due to resignation and replacement of board members. We do not believe that the requirement is overbroad. Applicants may word the language as they deem best for their organization. For example, they may specify that this future safeguard provision will become effective only if the applicant claims a credit for diversity and receives an authorization as a result of that claim. Kansas' proposal to certify that it will

³⁵ With respect to radio, the principal community (city grade) contours are the 5 mV/m for AM stations under Section 73.24(I), and the 3.16 mV/m for FM stations calculated in accordance with Section 73.313(c). With respect to television, a station's principal community (city grade) contour is either the 74, 77, or 80 dBu contour, depending on the particular channel on which it operates, as described further in Sections 73.684 and 73.685.

not apply for additional stations does not fully address the purpose of the governing document requirement, because Kansas does not address the potential that future members of its governing board may hold or acquire attributable interests in broadcast stations licensed to others. We do, however, recognize that it might be very difficult for state-chartered organizations, like the University of Kansas, to obtain legislative amendments to their charter. While we will not exempt such organizations from providing a safeguard, we will consider alternative safeguards from such organizations if they reasonably assure that board characteristics will be maintained during the four-year holding period. For example, the University of Kansas states that it is governed by a Board of Regents appointed by the governor. We would consider a certification from University making a commitment to maintain the Board characteristics on which it bases its diversity claim, accompanied by a description of procedures it has in place to effectively notify appointing officials and board members, both current and future, of their need to act consistently with the University's diversity representations to the Commission. While it would be preferable and simpler to have the commitment in the organization's charter, if possible, we believe that in circumstances such as those that Kansas describes we can rely on appointing officials, who know of the organization's representations to the Commission, to make appointments consistent with those representations. We specifically limit the availability of this option to entities whose governing documents cannot be amended without legislative action.

4. State-wide Networks

59. The Commission has long recognized the value of state-wide networks of NCE stations operating pursuant to state-wide educational plans. State-wide networks have been pioneers in NCE broadcasting, particularly in television, ensuring that educational programming is available throughout an area in a coordinated and organized manner, especially to schools. We adopted a two-point credit in the NCE Order for state-wide networks serving large numbers of accredited schools, and repealed a rule that required more general consideration of applicant participation in state-wide plans. See NCE Order at ¶ 61 citing 47 C.F.R. § 73.502. We recognized that, due to the locations of the multiple school campuses or school districts they serve, state-wide networks may be unable to avoid overlapping signals, and thus may not be able to qualify for diversity of ownership points. By awarding an equal two-point credit for state-wide networks whose service to schools disqualifies them for diversity of ownership points, we intended to level the playing field. Thus, applicants providing service to many schools, that cannot do so without some signal contour overlap and resulting loss of the diversity credit, would not be placed at a disadvantage in comparison to applicants serving a smaller number of schools or serving general listeners in locations that, unlike schools, are not site-specific. The credit is available to public and private state-wide networks, as defined in 47 C.F.R. § 73.7003(b)(3). That rule generally requires that the applicant's stations will provide programming to 50 accredited full time elementary/secondary schools, or five accredited full time college campuses in a single state, in furtherance of the school curriculum. Several petitioners urge us to either eliminate or modify our credit for state-wide networks. They object primarily to our inclusion of school curriculum in the definition of state-wide network and to the large number of schools that applicants must serve to qualify for the credit.

a. Curriculum

60. Educational Media Foundation (EMF) and Station Resource Group (SRG) seek elimination of the state-wide network credit. EMF believes that the credit amounts to a value judgment that instructional programming is better than general educational programming. It believes that the Commission is trying to limit the programming that an NCE station can broadcast, contrary to a recent decision in which the Commission withdrew advice on the types of programming that are educational. Station Resource Group opposes the credit on different grounds, arguing that virtually no radio broadcaster would qualify for the credit as currently defined, and that it would be preferable to substitute different, more readily available,

credits. Colorado Christian University and West Coast Public Radio would retain the credit for state-wide networks, but would delete the requirement that programming be used in furtherance of a school curriculum. According to Colorado Christian University, 65% to 75% of its adult students enroll at the college after listening to non-curriculum programs on the radio. Several commenters argue that the credit is of more value to television applicants than to radio applicants because radio stations are not as readily used as an instructional medium as television stations.

61. As indicated, we adopted points for state-wide networks to recognize a compelling educational reason that some NCE applicants may not be able to achieve the desirable goal of local diversity, and to avoid disadvantaging those applicants under our point system. When service to large numbers of schools is the reason for an educator's inability to qualify for the "diversity" credit, our point system values service to schools equally with diversity of ownership. We disagree with EMF's view that favoring school-based education on educational broadcast channels favors government speakers over private and religious speakers. A wide range of speakers, public and private, religious and secular, operate schools. A wide range of broadcast programming can further the curriculum of such schools. Perhaps, as some parties note, some applicants that operate schools will not qualify for this credit, because they target their broadcast service at the broader public, do not use their stations in connection with their school curriculum, or operate only one school. Perhaps, as others contend, television applicants will be more likely to qualify than radio applicants will. None of these factors would diminish our commitment to this credit. We did not expect this to be a widely available credit, but rather a tailored credit meant specifically to counterbalance the disadvantage otherwise suffered by applicants that lose diversity points because they regularly provide curriculum service to large numbers of schools. If fewer radio licensees will qualify for the state-wide network credit, that is only because fewer such entities will suffer the disadvantage under our point system for which this credit is intended to compensate. State-wide networks have played a more prominent role in television than in radio, and thus it is not surprising that more television than radio applicants would qualify. Moreover, television applicants serving schools may need this credit more than radio applicants may because television stations cover greater distances and have greater potential for overlap with co-owned stations.

62. We will not eliminate the inclusion of curriculum in our definition of state-wide networks. Under the non-curriculum-based credit urged by some commenters, any large system of schools or colleges would get the credit, regardless of whether its stations play any role in student education. The compelling reason for the applicant's inability to qualify for the diversity credit -- the applicant's need to serve the schools -- would no longer exist. The proponents of the alternative definition do not demonstrate that large schools that want to operate multiple stations for non-curriculum purposes should be treated any differently from other NCE applicants that want to operate multiple stations for non-curriculum purposes.

63. Connection to a school curriculum must be more than, as one petitioner suggests, a potential recruitment tool to attract students to attend a university. However, programming that furthers a curriculum need not be solely "instructional" *i.e.*, a broadcast of a teacher in a classroom. A college radio station operated by students as part of a class on broadcasting could also qualify regardless of the type of programming the students select. News or public affairs programming could further a curriculum if designed for use in a school to teach journalism or current events. Music and drama programs could be scheduled for use in a music or art appreciation curriculum.

b. Number of Schools Served within Contours of Overlapping Stations

64. Petitioners also ask us to adjust the number of schools that an applicant must serve to be considered for the credit. Station Resource Group believes that our numbers are arbitrary, failing to account for different sizes of student populations. It states, for example, that an applicant providing

service to five small colleges would qualify for the credit, while an applicant providing service to 45 large high schools would not qualify, even if the high schools had more students than the colleges.

65. Colorado Christian University similarly asks that we loosen a requirement in the state-wide network credit concerning station contours. As adopted, the combined contours of the applicant's authorized stations and the one proposed station, must encompass the schools to be served. Colorado Christian asks that we consider the contours of all of the applicant's pending proposals. It maintains that applicants may want to serve large numbers of campuses, but that stations needed to cover those schools have not yet been authorized due to their mutual exclusivity with stations proposed by other applicants.

66. With respect to identifying an applicant's stations that will count as serving schools in our analysis, we will consider only existing authorizations, and the one proposed station under consideration. The diversity credit that we seek to counterbalance limits consideration to these same stations. As an applicant would not be disadvantaged by any other proposed stations for purposes of the diversity credit, we will not consider such proposals for purposes of the state-wide network credit. Further, while an educator may have applications pending to construct additional stations that could serve more schools, it may or may not ever be authorized to operate such stations.

67. We clarify that the schools to be served need not be of a particular size, because the size of the student population served is not necessarily related to the applicant's inability to avoid overlapping service contours. We recognize, as SRG predicts, that there may be individual instances in which an applicant serving fewer students will receive a credit as a state-wide network over an applicant serving more students. Such a result is not troublesome because the state-wide network credit is not, for example, intended to promote service to colleges with large enrollments over colleges with small enrollments. Rather, we are making a distinction based on the number of campuses receiving broadcast service. A college that operates multiple stations to provide broadcast signals to each of its many campuses is more likely to experience overlap of its signals than another college in the same state seeking to provide broadcast service to fewer campus locations. Accordingly, to counteract any disadvantage in qualifying for a diversity credit, it is appropriate for the state-wide network credit to consider number of campuses rather than student population.

c. Small Institutions/Aggregation of Stations Licensed to Different Entities

68. We also clarify that even small schools and colleges with few campuses can qualify for the state-wide network credit if, through consortia arrangements, they will provide curriculum programming to schools in additional to their own. We make this clarification in response to concerns of Santa Monica Community College District ("Santa Monica") and the American Association of Community Colleges ("AACC"), which represents over 1,100 community colleges nationally. For example, AACC notes that although Rhode Island and Delaware community colleges operate pursuant to state-wide educational plans they each have fewer than five campuses. AACC also states that community colleges often are not part of the state university system, and that because the degree of centralized authority at the state level varies, there is some uncertainty over which schools individual community colleges could count within their network.³⁶ For example, Santa Monica operates only one college campus. It is concerned that it might not

³⁶ AACC identifies four categories of community colleges: (1) those that are part of the state university system; (2) those under the direct control of state community college board; (3) those in which control is divided between state boards and locally elected or appointed officials; and (4) those in which a local board has all governing authority, with a state board serving a general coordination and policy function. Comments of AACC at 5.

receive a state-wide network credit for future stations, because Santa Monica does not have authority over campuses licensed to other districts within California, and does not provide programming to any single institution with more than five campuses.

69. Community colleges or other small entities are not by virtue of size or organizational structure precluded from qualifying as state-wide networks, but the manner in which any particular organization might qualify for the credit will vary depending on such factors. First, if a central community college board or similar entity exerts control over individual districts, in the same manner that a parent entity controls subsidiaries that have their own governing boards, the stations of any community college district in the state would be attributable to the same parent entity. If the applicant's stations encompass five campuses with a common parent entity, and are used in the curriculum of those campuses, it could qualify for the state-wide network credit. This might occur, for example, if one district has a particular expertise in broadcasting, and therefore sister districts choose to use the service of this district rather than to operate their own stations.

70. Alternatively, an applicant could qualify for the credit if its multiple stations are used in the curriculum of its own single campus and those of four separately operated college campuses, through an agreement with the separate colleges. For example, public and/or private four-year universities might regularly use a community college's broadcast programs that also relate to their curriculum. Similarly, a school district with fewer than 50 elementary and secondary schools could qualify for the state-wide network credit if it also will provide programming to a neighboring school district, if the requisite number of schools in both districts combined will use the programming in their respective curricula. Accordingly, we clarify that consortiums of schools coordinating broadcast programming for use in their respective curricula, and non-schools serving such consortiums, can qualify for the state-wide network credit pursuant to 47 C.F.R. § 73.7003(b)(3)(c),³⁷ if in the aggregate they serve five college campuses or 50 elementary and/or secondary schools. Applicants cannot, however, aggregate colleges and elementary/secondary schools served. For example, an applicant serving four college campuses and ten high schools, will not be treated as equivalent to an applicant serving five college campuses. As colleges tend to be spaced further apart than lower level schools, it is not unanticipated that there would be several elementary/secondary schools within the vicinity of a college and vice-versa. Serving these additional schools would not generally require the applicant to cover a significantly larger area, and thus would not affect its ability to receive a diversity credit. Additionally, if the applicant is simply operating multiple radio stations to serve its own single campus and to reach the general public beyond its campus, without being used in a curriculum by the requisite number of schools, it would not be able to receive a state-wide network credit regardless of the number of schools that might happen to be located within its service area. In sum, applicants that provide curriculum service to the requisite number of schools, through arrangements with those schools, can claim a state-wide network credit even if all of the schools are not under one common authority.

E. Point Factors Not Selected/New Point Proposals

71. In the NCE Order we considered, but decided not to adopt, several other point system factors. A few petitioners urge us to reconsider factors previously rejected, or to consider adding new factors to the point system.

³⁷ This rule section establishes the eligibility of "an organization, public or private, with or without direct authority over schools, that will regularly provide programming for and in coordination with [entities with the required number of schools/campuses] for use in the school curriculum." 47 C.F.R. § 73.7003(b)(3)(c).

1. Local Program Origination and Other Localism Points

72. Broadcasting for the Challenged and National Federation of Community Broadcasters believe that we should provide credit for additional local factors beyond the established local applicant credit discussed above. BFTC states that it is inconsistent to award a credit for established local applicants, but not for local program origination by non-local applicants. It urges us to give three points to non-local applicants that intend to involve the local community in their stations, as a way to recognize that, in BFTC's opinion, community-minded non-local broadcasters are equivalent to those already present in the local community. Specifically BFTC urges us to award credits for applicants that would (a) establish local advisory boards; (b) employ 80% local employees; (c) train local interns and students; and (d) provide at least 50% locally produced programming. NFCB supports credits for local program origination as well. It notes that LPFM stations can receive points for local program production, and states that LPFM service is not a substitute for full service local programming. NFCB argues that a credit for locally produced programming would be consistent with Commission and court cases supporting local program origination and believes that the NCE Order does not adequately explain the reason for departure from an existing policy. Further, NFCB would award points to stations that are locally funded, which it believes is a good indication of community support, and for use of local talent or provision of airtime to local residents, which it believes will increase diversity of viewpoint. Community Television, Inc. opposes these suggestions. It views our existing localism points as disfavoring religious-oriented broadcasters, and argues that adding more localism factors would be entirely unsupportable.

73. With respect to BFTC's suggestion of awarding points to a non-local applicant planning to provide community service, we note that the various steps that BFTC identifies may be helpful to non-local applicants in efforts to learn about the community's educational needs and to maintain good community relations. We decline, however, to award points based on an applicant's mere intention to implement such procedures. BFTC's suggestions involve plans for the future, and are not readily verifiable upon application. An applicant with the best of intentions may fail to live up to such promises if, for example, it finds that there are insufficient local residents skilled in broadcasting and thus it cannot fulfill its earlier plan to hire locally. We believe that it is better policy to award points for factors that can be verified at the time of application. Further, the record before us does not identify non-local NCE licensees that have instituted such policies in the past or provide information about the service records of any such stations. Thus we do not have a sound basis on which to conclude that non-local applicants would provide service equivalent to local applicants if the former were to establish local advisory boards, employ local residents, or train local interns and students. Nor does it appear to us that any of those mechanisms would ensure that a station's service is responsive to local community needs and interests to the same extent as if the licensee were awarded to a locally based organization. Accordingly, we will not adopt BFTC's suggestion.

74. NFCB's proposed credits for local programming, public access, and local funding are similar to proposals considered but rejected in the NCE Order. We decline to adopt those factors for the reasons stated therein. Given the difficulties in receiving financial backing for a non-profit venture like construction of an NCE station, applicants should have the flexibility to finance construction using whatever sources, local or non-local, are available. Similarly, full service NCE applicants should have the flexibility to air the programming that they conclude will best serve the needs and interests of the community, whoever produces it, and wherever that production takes place.

2. Radio Reading Services

75. West Coast Public Radio suggests that we award two points to FM applicants that would make their subcarrier frequencies available to organizations that provide reading services for the blind. NFCB, while acknowledging the good work of radio reading services, opposes this suggestion because the

proposal does not take into account whether reading services in an area need more outlets to transmit their services, or whether existing options are already adequate. We agree with NFCB's critique. We also note that radio reading services are but one of many possible ways which FM subcarrier frequencies might be used to address a community need. For example, such frequencies can also be used to provide foreign language programming. Further, regardless of whether subcarriers are used for radio reading services or other worthwhile endeavors, subcarrier signals are not received by the general public, but only by a distinct subset of listeners with specially designed receivers. Therefore, to establish a credit for radio reading services, we would need to conclude that reading services are superior to all other possible subcarrier uses, and that subcarrier service requiring special receive equipment deserves points similar to radio service that everyone can receive. Such conclusions are not supportable under the current record. Thus, we will not award any points for this factor.

F. Tie Breakers

76. In the NCE Order we recognized that some mutually exclusive applicants might qualify for equal points. For such scenarios we established tie breaker mechanisms. If applicants differ in terms of their number of existing authorizations, we would award the permit to the applicant with the fewest authorizations. If that factor fails to break the tie, we would select the applicant with the fewest pending applications. If applicants nevertheless remain tied, and are unable to settle among themselves, we instituted mandatory time sharing as a tie breaker of last resort for full service stations.

77. Several commenters object to our tie breakers. Broadcasting for the Challenged argues that an applicant's distant stations and applications are irrelevant because they have no impact on the proposed station or local listeners. Station Resource Group argues that our tie breakers are inconsistent with our recognition elsewhere of the benefits of centralized NCE operations, and with our grant of main studio waivers. Educational Media Foundation is concerned that a speculative applicant without any existing stations would prevail over an existing broadcaster with stations in a different part of the country. It also questions the propriety of counting stations without considering the size of the communities served. It gives as an example, a tie breaker between an applicant with one existing station serving a million people, and a competing applicant with two stations serving rural areas with far fewer people combined. EMF argues that we should not favor the first applicant just because it has fewer stations, as it would be inaccurate to consider the first applicant as having a more limited opportunity to air its viewpoint to the public. NFCB, while supporting our tie breakers based on authorizations and applications, objects to use of time sharing as a tie breaker of last resort. It views mandatory time sharing as an abdication of the Commission's responsibility for choosing among applicants, which aims to force applicants into private negotiations among themselves.

78. We acknowledge that the tie breaker selection factors highlight relatively minor differences between applicants. We also acknowledge that mandatory time sharing is unpopular and can be difficult for applicants with different missions, philosophies, or formats. Thus, these factors are considered only as tie breakers among applicants that are equally qualified under the primary selection factors. As tie breakers, these factors are fair. An applicant with more stations than its competitor already has more outlets to air its viewpoint and programming. It would be unnecessarily complex to compare for tie breaking purposes whether any of those stations are superior to others in terms of coverage or population served. Moreover, it is an efficient use of limited spectrum to award a permit to the applicant that applies in a few carefully chosen areas most suitable to its educational goals. An equally qualified applicant that has additional applications pending for other locations has more options available to it. As a last resort, time sharing recognizes the equal qualifications of applicants that have survived several tie breakers by giving the applicants partial, but equal, authority to broadcast. It has been a longstanding Commission practice to use time sharing to break ties in comparative broadcast cases, and we do not consider it an abdication of

responsibility. *See, e.g., Southeastern Bible College, Inc.*, 85 FCC 2d 936 (Rev. Bd. 1981).

79. Whatever shortcomings our tie breakers may have, the petitioners suggest no better alternatives. The only alternative presented is a tie breaker lottery. As noted in the NCE Order, the statute governing our use of lotteries requires that substantial preferences be given in lotteries for minority control, a requirement that may well be challenged on constitutional grounds, resulting in litigation that would delay the award of licenses under our new procedures. Such additional delays would be particularly intolerable after the prolonged delays in processing NCE applications due to the comparative hearing freeze. Further, we do not see how use of a lottery, a process of random selection, is likely to result in the licensing of the applicant best qualified to serve its proposed audience, the factor that the petitioners argue is lacking in our chosen tie breaker system. Accordingly, we affirm our tie breaker system.

G. Attribution of Full Service and Translator Stations

80. Because several factors in the NCE point system, including diversity of ownership, localism, and tie breakers, are based on whether the applicant also has interests in other broadcast stations, we established attribution rules for NCE organizations. These rules are similar to those applicable to commercial broadcasters, attributing the interests of the applicant, its parents, and its subsidiaries, their officers and members of their governing boards. To implement these attribution standards we modified Section 73.3555 of our rules concerning ownership. The rule, which previously stated that none of its provisions applied to NCE applicants, now says that the rule, including its attribution provision, is applicable to NCE applicants to the extent that they are compared pursuant to Subpart K, which sets forth our new comparative criteria.

81. DeLaHunt Broadcasting states that the relevance of attribution to NCE applicants is not limited to the point system in Subpart K. For example, it notes that Subpart G, which governs the low power FM (LPFM) service, provides that a party with an attributable broadcast interest cannot hold an attributable interest in a low power FM (LPFM) licensee. DeLaHunt also believes that Subpart I, governing auctions of non-reserved channels, counts attributable interests in noncommercial stations for determining whether an applicant qualifies for a noncommercial bidding credit. In amending the notes to Section 73.3555, we meant to clarify that commercial attribution standards also apply to NCE stations, to the extent that attribution is relevant to such stations. Attribution is certainly relevant for Subpart K, but we should have included it as an example only. Accordingly, we will now modify Section 73.3555 to use Subpart K as an example only. Whenever attribution issues are relevant for NCE purposes, the standards in Section 73.3555 will apply.

82. Educational Communications of Colorado Springs asks whether the Commission will provide attribution relief similar to that provided to commercial entities, in considering the attributable interests of officers and directors whose responsibilities are wholly unrelated to broadcasting.³⁸ For example, it notes that an officer of an NCE applicant may sit on the board of a university or church whose primary mission is distinct from broadcasting, but which may have a broadcast station. Educational Communications of Colorado Springs believes that the officer should be relieved from attributable interests if he is willing to recuse himself from the secondary broadcast-related business of the other organization. As a safeguard, it proposes that an officer no longer willing to recuse himself on one board, must resign from the other.

³⁸ See 47 C.F.R. § 73.3555, n.2(h).

83. We clarify that the commercial attribution principles contained in the notes to Section 73.3555 are generally applicable to NCE applicants for comparative purposes. The specific provision to which the petitioner refers, 47 C.F.R. § 73.3555, n.2(h), establishes that if an entity engages in a primary business other than broadcasting, applicants may request that the Commission waive attribution for any officer or director of the company whose responsibilities are wholly unrelated to broadcasting. NCE applicants may similarly request waivers, asking us to find as non-attributable an officer's position with another entity because it has demonstrated that the officer's duties and responsibilities with that entity are wholly unrelated to that entity's broadcast business. Applicants should indicate the points for which it would qualify both if the waiver were granted and if the waiver were denied, so that we will not need to request additional information from the applicant.

84. We also clarify *sua sponte*, the extent to which applicants should count translator stations in determining local diversity and tie breaker matters. The text of the NCE Order and the full service rules adopted therein, generally reflect our intent that for determining local diversity points we will consider overlap of the proposed station with attributable NCE and commercial stations, "comparing radio to radio and television to television." NCE Order at ¶ 35; 47 C.F.R. § 73.7003(b)(2). Similarly, for tie breakers, they state that we would consider the number of an applicant's existing authorizations and applications "in the same service (radio or television)." NCE Order at ¶72; 47 C.F.R. § 73.7003(c)(1). See also 47 C.F.R. § 73.7003(c)(2) ("same service"). We note, however, that tie breaker language elsewhere in the document could give a mistaken impression that we intended translator stations to have no tie breaking impact on full service stations and vice versa. See NCE Order, n.59; Appendix A (Tiebreaker A); 47 C.F.R. § 74.1233(e)(3).³⁹ Accordingly, as discussed below, we clarify our intent.

85. In applying for a reserved channel station, whether full service or FM translator, the radio applicant generally should include its translators for purposes of determining diversity points and tie breakers. It would report all attributable commercial and noncommercial radio stations: AM, FM, and non-fill-in FM translators, *i.e.*, translators that extend the area of a full service station.⁴⁰ We will recognize an exception to this principle, however, for any radio translator licensee that, in the particular application involved, is seeking a full service station to replace its existing translator station(s). Such applicants may exclude, on that application, any existing translator station that will cease operating when the proposed full service station commences operation. We will, however, permit full service television applicants to exclude TV translators and Low Power Television (LPTV) stations when reporting attributable commercial and noncommercial TV stations. As a result of the transition from analog to digital television, translators may be an important resource in resolving interference issues, and we do not wish to preclude that possibility until that matter has been addressed. Due to the impact the transition to DTV has on LPTV and TV translator stations, we will not require full service television applicants to count LPTV or TV translators. Accordingly full service TV applicants applying for reserved channels should report all attributable commercial and noncommercial television stations: UHF and VHF, and Class A, but excluding TV translators and LPTV stations.

³⁹ Footnote 59 and rule section 74.1233(e)(3), could be understood as considering translators other than fill-in stations for purposes of tie breakers only in connection with an application for another non-fill-in translator station. The tie breaker summary in Appendix A might be read to exclude translator and AM stations.

⁴⁰ It generally should not count fill-in FM translator stations, which simply fill dead spots in the contours of the applicant's full service station. Only if the radio applicant is specifically seeking a fill-in translator station should the applicant report its number of other fill-in stations, to be used in the event that we receive mutually exclusive fill-in proposals.

H. Application Processing Issues

1. General Procedures

86. The manner in which we will process applications is relevant both to pending applications and future applications. For pending reserved channel applications in closed groups, which are not subject to additional competing applications, the staff has already reviewed these proposals for mutual exclusivity only and has determined the members of each closed group.⁴¹ As described previously, these applicants will need to supplement their applications to provide point information. As to future applications, in the NCE Order we decided to open short filing windows periodically. These applications will be filed on a new Form 340, which asks for the information needed to determine the points for which an applicant would qualify. All applications received during a particular window will be examined initially for mutual exclusivity only. As described above, and for the first filing window only, the staff will examine for mutual exclusivity any applications filed prior to adoption of the NCE Order which are still subject to competing applications, along with applications filed within the first window.

87. After analyzing mutually exclusive applications under our new comparative standards, the Commission will issue an order or decision letter announcing the tentative selectee in a particular proceeding.⁴² As we will have initially examined applications for mutual exclusivity only, we will consider whether any tentative selectee's application (FCC Form 340 or 349) has defects. If found acceptable, we will announce that fact by a public notice generated by the Consolidated Database System (CDBS) entitled "Broadcast Applications." Petitions to deny the application must be filed within 30 days following release of the Broadcast Applications Public Notice announcing acceptance of the application at issue. Interested parties should monitor these Broadcast Applications public notices. If a tentative selectee's application has acceptability defects, it will be returned so that the applicant may have one opportunity to cure the defect. If the defect is cured consistent with the standards for acceptable applications the staff will generate a public notice via CDBS, triggering a 30-day period for petitions to deny. Failure to correct the defect, however, will render the application unacceptable and we will proceed to tentatively select the applicant with the next highest number of points. So that interested parties may verify or dispute the tentatively selected applicant's point tally, we would require applicants to file documentation of their point claims at the time of application both in their local public inspection files and with the Commission. The staff also would conduct random audits of points claimed. Other than specifying these broad guidelines, we did not establish processing procedures either for pending or future applications, instead delegating that responsibility to the Mass Media Bureau. Several petitioners ask us to clarify or establish additional

⁴¹ Specifically, there are 439 groups of reserved channel full service FM applicants, consisting of 1,356 applications, and 31 groups of reserved channel television applicants, consisting of 89 applications. There are 43 groups of FM translator applicants, consisting of 97 applications. Our preliminary studies only identify mutual exclusivity between applications of the same type, and not, for example, whether proposals in FM translator applications are consistent with facilities proposed in full service FM applications. Additionally, full service FM applications were studied based on technical rules in place at time of filing. Specifically, the staff did not consider technical changes in the protection ratios adopted in *Streamlining or Radio Technical Rules*, MM Docket No. 98-93, FCC 00-368 (November 1, 2000), untimely amendments, or post April 21, 2000 amendments.

⁴² As discussed in the NCE Order, use of the point system is considered a simplified hearing and the Communications Act does not yet allow the Commission to delegate authority over NCE point hearings to the staff. See 47 U.S.C. § 155(c). Thus, initially, these matters will be referred to the Commission. The Commission, as suggested by Station Resource Group, will request Congressional authority to delegate these matters to the staff similar to that received when point systems were used in the Instructional Fixed Television Service.

processing requirements and guidelines, which would be generally applicable both to pending and future NCE applicants.

88. First, we consider a request from Spring Arbor College, which asks us to clarify that we will enable competing applicants to act as private attorneys general, disputing a tentative selectee's claims, rather than just conducting random audits. We clarify that the applicant's documentation, as specified and submitted in accordance with the instructions to the NCE application, Form 340, will be available for public review. Interested parties can provide useful analysis of such information in the context of petitions to deny or informal objections filed in response to public notices announcing our choice of tentative selectees. For example, if our tentative selectee claimed points as a state-wide network, it would have been required to provide information about the schools to be served. Interested parties will be able to examine the basis for the applicant's certification, and thus may independently verify, for example, whether the schools served operate full time and are accredited, as required. In addition, the Commission will randomly conduct audits of the information submitted. The process adopted thus provides reasonable assurance that the statements made will be verified for accuracy, either by competing applicants, the Commission, or the general public.

89. Next, we consider two petitions asking us to specify the processing order of applications. Station Resource Group, which focuses on pending applications, suggests a chronological order, resolving the earliest groups to file before considering later filed pending groups. University of Northern Ohio ("Northern Ohio"), whose views raise issues relevant to all applications, suggests geographical processing, and would only use chronology if there were two groups of applications for the same city. In support of this position, Northern Ohio states that local competing applications may be in conflict with a distant co-channel operation and that, by approaching the applications geographically, we could maximize the number of licenses awarded. For example, it maintains that in a situation where there is a chain of mutually exclusive applications, it is possible that applications at either end of the chain would not be mutually exclusive with each other, except for the existence of the middle applicant(s). Northern Ohio asks us to resolve the middle applications first, and then, if the resolution of that situation removes a conflict with another proposal, to grant that other proposal as well.

90. We do not believe that it is appropriate or necessary at this time to specify in the abstract a particular processing order, *i.e.*, the order in which we will resolve the mutually exclusive groups of NCE applications on file or the order in which we will analyze any particular applications within those groups. We will process applications in a manner that will be most administratively efficient and that will be most likely to result in selection of the best qualified applicants as judged by the point system adopted in this proceeding. In that regard, we note that, while the "upside" of Northern Ohio's "geographic" proposal is that it may permit the selection of more than one applicant from any single mutually exclusive group, it also has a clear "downside." Specifically, after the best qualified applicant is selected, it is possible that remaining applicants that are not mutually exclusive with this primary selectee and thus potentially secondary selectees, may also be significantly inferior to other applicants that are eliminated because they are mutually exclusive with the primary selectee. Rather than issue authorizations to applicants whose potential for selection stems primarily from their position in the mutually exclusive chain, we believe it is appropriate to dismiss all of the remaining applicants and permit them to file again in the next filing window.

2. Procedural Issues For Future Window Applications

91. Station Resource Group and West Coast Public Radio raise processing issues relevant specifically to applications filed in future windows. First, to limit potential speculation, they ask us to limit to five or ten the number of applications that any organization may file in a single filing window. Second,

they ask us to commit to open at least one window, scheduled to coincide with the due date of funding requests to the Public Telecommunications Funding Program (PTFP), which is administered by the National Telecommunications Information Agency (NTIA), and upon which many NCE applicants rely. Because NTIA accepts funding requests only once a year, and requires their applicants to indicate that they have filed a broadcast application with the Commission, some organizations are concerned that they may lose the opportunity to apply in an NTIA funding cycle if we do not open an application filing window immediately before NTIA applications are due.

92. The suggestion to limit the number of applications submitted in any particular filing window is essentially the same as one that was considered but rejected in the NCE Order. NCE Order at ¶¶ 85-86. We did not believe that such limits were needed to prevent speculative applications, because other aspects of our new procedures, including the window procedure itself and a four-year holding period, serve to discourage speculation. Further, the tie breaker mechanism favors applicants with fewer applications. We do, however, reserve the right to establish such a limit in the future by public notice, if the number of applications filed exceeds our expectations. Petitioners do not provide persuasive reasons for changing our decision at this time.

93. With respect to funding, we appreciate concerns of commenters that need to apply to the Commission in time to also apply for funding available from another agency. The Commission and its staff are well aware of the importance of PTFP funding, especially to smaller organizations that could not construct a station without this program's financial assistance. Our staff therefore has always coordinated closely and in a timely manner with NTIA staff to ensure that both agencies can fully consider the applicants' related proposals. We expect that coordination between the Commission and NTIA will continue and will result in the opening of sufficient Commission filing windows for applicants to meet the requirements of NTIA.

3. Terminated Hearing Proceedings

94. In the NCE Order, we terminated "any traditional comparative hearing proceedings to which a noncommercial educational applicant is a party." NCE Order at ¶ 129. Jimmy Swaggart Ministries ("Swaggart") and Real Life Educational Foundation of Baton Rouge, Inc. ("Real Life"), which are mutually exclusive with each other and have already been through a comparative hearing in MM Docket No. 88-308, ask for clarification of the process that will apply to former hearing applicants. Real Life believes that the prior hearing process has been replaced by a point system which will apply to such applicants, while Swaggart maintains that it would be inefficient and unfair to completely discard the results of hearings that have already taken place.

95. We believe that the proceeding between Real Life and Swaggart is the only pending proceeding that was once subject to a full evidentiary hearing. That case is essentially before us for a new initial selection among the applicants. We will apply a point system to that proceeding, identical to that applied to all other pending applications for which no initial selection was made prior to the effective date of the point system.⁴³ Although not specifically suggested by Swaggart or Real Life, we considered the possibility of using the old hearing results as a final tie breaker, in the event that the hearing parties are found otherwise equal under the point system and the usual tie breakers set forth in 73.7003(c) do not result in a winner.

⁴³ We generally will not apply the point system to any comparative FM translator proceedings for which we made initial selections before the August 7, 2000 effective date of the point system. Any requests for reconsideration of those decisions will be examined under the rules in effect at the time of the initial selection.

However, given the vagueness of our former hearing standards, we cannot say with a certainty that such result would be better than time sharing, the ultimate tie breaker that would otherwise resolve the matter. In fact, the hearing case between Real Life and Swaggart was one which was an impetus for revamping the standards for comparing NCE applicants, with the Review Board finding very little distinguishing among their proposals under the vague hearing criteria then in effect.⁴⁴ Accordingly, the pending Real Life and Swaggart applications will be considered under the new point system in all respects.⁴⁵

I. Settlements

96. We briefly discussed settlements in the NCE Order. We stated that settling parties would be limited to reimbursement of their reasonable and prudent expenses. We also stated that we would not “adopt a formal settlement period, so as not to unduly delay the award of points in cases where the parties are not interested in settlement, but stress that parties are free to settle at any time during the process.” NCE Order at ¶ 74. See 47 C.F.R. § 73.7003(d). Although pending NCE applicants have been able to settle with each other for a considerable time, both before and after the NCE Order, few have filed settlements. To foster settlements, the University of Kansas believes that we should provide for existing applicants to amend out of a mutually exclusive group by specifying any other available channel for which no one has applied. It asks us to modify Section 73.3573 of our rules to consider such action as a minor change. Kansas believes that such action would be consistent with 74.1233(e)(2) used to resolve mutually exclusive FM translator applications.

97. We do not adopt Kansas’s proposal because it would preclude other full service applicants from applying for the available frequencies in the next filing window. Under existing rules, an applicant may make engineering changes to bring about a settlement if the change is “minor”, *e.g.*, proposing to move to an adjacent channel. 47 C.F.R. § 73.3573. Because existing stations can also file applications for minor changes outside of filing windows, minor changes to pending applications made outside of filing windows do not adversely affect the rights of existing licensees. In contrast, the settlements based on major changes that Kansas proposes could preclude existing stations from filing major changes in the next window. We will not permit this. If the applicant that desired to make the major change to its proposal does not prevail in a point proceeding, it may file its alternate proposal in the next filing window, subject to competition from any additional applicants with similar plans for that channel. We recognize that our rules are more lenient, in this regard, for FM translator stations. Translators are secondary services, however, and thus allowing a translator to amend to another channel does not have a preclusive effect on future applicants for full service stations.

98. We will, however, provide additional clarification of the settlement policies that will apply to mutually exclusive NCE groups.⁴⁶ Settlement of NCE proceedings can be beneficial both to applicants and

⁴⁴ See NCE Order at ¶ 5, *citing Real Life Educational Foundation of Baton Rouge, Inc.*, 6 FCC Rcd 2577, 2580, n.8 (Rev. Bd. 1991).

⁴⁵ See *Community Television, Inc. v. Federal Communications Commission*, 216 F.3d 1133, 1143 (D.C. Cir. 2000); *Chadmoore Communications, Inc. v. Federal Communications Commission*, 113 F.3d 235, 240-241 (D.C. Cir. 1997) (application of rule changes to pending applications is not considered retroactive rulemaking).

⁴⁶ The settlement discussion herein does not affect the rights of any NCE television applicants that by July 17, 2000, filed settlements pursuant to the procedures set forth in DA 99-2605 (as extended by DA 00-536), which (continued....)

to the Commission. Applicants are able to achieve a solution that is most acceptable to the parties, and the Commission is able to conserve the resources we would spend to select among them. Two types of settlement agreements will be acceptable: universal settlements and technical settlements, each of which allows immediate grant of an authorization. Universal settlements resolve the claims of all applications within a mutually exclusive group. Technical settlements make it possible, by means of minor engineering changes, for one applicant to remove itself from the group on the four corners of its own application without affecting the viability of any other applicants. Thus, through a technical settlement, the Commission can authorize one applicant immediately, while also considering later which of all of the other applicants should build a second NCE station. An example is a unilateral action or agreement between applicants at the end of a chain, making it possible to grant one of those applicants, while not affecting the rights of the others to compete. We will not accept partial settlement agreements such as those in which applicants withdraw from one proceeding in return for the promise of a competing applicant to withdraw from another proceeding, but fail to achieve any grantable application or to settle with the remaining applicants in each group. Such settlements potentially prejudice the remaining non-settling applicants. Partial settlements also encourage applicants to eliminate the best competing proposals without any resulting public benefit such as faster initiation of service. Considering proceedings with partial settlements would not take any less time, and could actually take longer because the settlement creates a two-step process for the Commission (acting on the settlement and comparing the remaining group or groups of applicants) instead of the one-step process of comparing all of the applicants.

99. Finally, for a short period ending with the date on which existing groups of mutually exclusive NCE applicants must file supplements to claim points, we will entertain settlement agreements that exceed the applicant's reasonable and prudent expenses. We have been unable to process mutually exclusive NCE applications since 1995 due to the lack of workable NCE comparative standards. Under similar circumstances, we permitted competing ITFS applicants to settle without any limitations on payments to withdrawing applicants. *See First Report and Order, Competitive Bidding*, 13 FCC Rcd 15920, ¶ 206 (1998). We believe that our consideration of such settlements among closed groups of NCE applicants will facilitate resolution of these long-frozen comparative initial licensing proceedings. Thus, by the date that the staff announces for the acceptance of supplemental filings, applicants will file either supplements to claim points, universal settlements resolving the entire group, or technical settlements providing for the grant of an application as a result of minor engineering changes. Any applicants that have settlement agreements already on file pursuant to previous settlement policies may continue to pursue those settlement agreements, but have an affirmative obligation to submit a written statement to the staff by the supplement date referencing the pending settlement. Applicants with neither a settlement nor supplement on file by the supplement date will be dismissed. For settlements received by the supplement date, the Commission will waive any of its rules, such as 47 C.F.R. § 73.3525(a)(3), that preclude the receipt of any money or other consideration in excess of legitimate and prudent expenses in exchange for the dismissal of an application, but due to the nature of the NCE service we will not waive our policy against "white knight" settlements

(Continued from previous page) _____

permitted applicants on television channels 60-69 and applicants in television freeze areas to settle their mutually exclusive applicant groups, to file petitions for rulemaking specifying a new "core" television channel (between 2 and 51) and/or to amend their applications to provide the requisite interference protection to the digital television Table of Allotments. For those applicants, we will consider the settlement agreements and technical proposals already on file. *See "Mass Media Bureau Announces Window Filing Opportunity For Certain Pending Applications and Allotments Petitions for New Analog TV Stations," Public Notice*, DA 99-2605, released November 22, 1999; and "Window Filing Opportunity for Certain Pending Applications and Allotment Petitions for New Analog TV Stations Extended to July 15, 2000," *Public Notice*, DA 00-536, released March 9, 2000.

involving non-applicant third parties. This is a one-time opportunity. We do not envision waiving our rules beyond the period provided herein. Thus, while we always encourage settlements among NCE applicants, any settlements filed after the deadline for point supplements will be subject to the monetary limits in our rules.

V. PROCEDURAL MATTERS AND ORDERING CLAUSES

100. As required by the Regulatory Flexibility Act, 5 U.S.C. § 601 *et seq.*, a Supplemental Final Regulatory Flexibility Analysis has been completed and is attached as Appendix C hereto.

101. Authority for issuance of this Memorandum Opinion and Order is contained in Sections 4(i), 303(r), 403, and 405 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 303(r), 403, and 405.

102. The actions taken in this Memorandum and Order have been analyzed with respect to the Paperwork Reduction Act of 1995, and found to impose no new or modified reporting and recordkeeping requirements or burdens on the public.

103. Accordingly, IT IS ORDERED that the petitions for reconsideration and clarification listed in Appendix A ARE GRANTED to the extent provided herein and otherwise ARE DENIED pursuant to Sections 4(i), 303(r), 403, and 405 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 303(r), 403, and 405, and Section 1.429(i) of the Commission's rules, 47 C.F.R. § 1.429(i).

104. IT IS FURTHER ORDERED that the Commission's Consumer Information Bureau, Reference Information Center, SHALL SEND a copy of this Memorandum Opinion and Order including the Supplemental Final Regulatory Flexibility Analysis, to the Chief Counsel for Advocacy of the Small Business Administration.

105. IT IS FURTHER ORDERED that the Commission's rules ARE AMENDED as set forth in Appendix B. IT IS FURTHER ORDERED that the provisions of this Memorandum Opinion and Order and the rule amendments set forth in the Appendix SHALL BE EFFECTIVE 30 days following publication in the Federal Register.

106. IT IS FURTHER ORDERED that this proceeding IS TERMINATED.

107. For additional information concerning this proceeding, contact Irene Bleiweiss, Mass Media Bureau, Audio Services Division, (202) 418-2700.

FEDERAL COMMUNICATIONS COMMISSION

Magalie Roman Salas
Secretary

SEPARATE STATEMENT OF COMMISSIONER HAROLD W. FURCHTGOTT-ROTH**In re Reexamination of the Comparative Standards for
Noncommercial Educational Applicants
Memorandum Opinion and Order in MM Docket No. 95-31**

I write today to acknowledge the constitutional concerns expressed by religious broadcast advocates, such as the Educational Media Foundation, in this proceeding. As I have stated before, the Commission must be diligent in crafting rules that fully respect the spectrum of freedoms guaranteed to all Americans under the First Amendment of the United States Constitution. While the point system refinements adopted by the Commission today are not perfect, they are in the main, speaker and subject matter neutral. Suffice it to say, the point system is far more preferable, and less constitutionally suspect, than the comparative hearing process, a lottery system, or any other existing regulatory mechanism in selecting among competing applicants for broadcast services on channels reserved for noncommercial educational use.

APPENDIX A**List of Participants**

American Association of Community Colleges
Broadcasting for the Challenged, Inc.
Center for Media Education, et al.
Colorado Christian University
Community Television, Inc.
Connecticut College Broadcasting Association, Inc.
De La Hunt Broadcasting
Diocese of St. Augustine
Educational Communications of Colorado Springs, Inc.
Educational Media Foundation
Jimmy Swaggart Ministries
Lay Catholic Broadcasting Network
Munn-Reese, Inc.
National Federation of Community Broadcasters, et al.
Real Life Educational Foundation of Baton Rouge, Inc.
Santa Monica Community College District
Spring Arbor College
Station Resource Group
University of Kansas
University of Northern Iowa
WAY-FM Media Group, Inc.
West Coast Public Radio, et al.

APPENDIX B
RULE CHANGES

Parts 73 and 74 of Chapter 1 of Title 47 of the Code of Federal Regulations are amended as follows:

PART 73 - RADIO BROADCAST SERVICES

1. The authority citation for part 73 continues to read:

Authority: 47 U.S.C. 154, 303, 334, and 336.

2. Section 73.3555 is amended by revising the last sentence of paragraph (f) to read as follows:

§ 73.3555 Multiple ownership.

(f) * * * However, the attribution standards set forth in the Notes to this section will be used to determine attribution for noncommercial educational FM and TV applicants, such as in evaluating mutually exclusive applications pursuant to Subpart K.

3. Section 73.7000 is amended by adding a final clause to the definition of Local Applicant to read as follows:

§ 73.7000 Definition of Terms (as Used in Subpart K only).

Local Applicant: an applicant physically headquartered, having a campus, or having 75% of board members residing within 25 miles of the reference coordinates for the community to be served, or a governmental entity within its area of jurisdiction.

4. Section 73.7002 is amended by revising paragraph (b) to read as follows:

§ 73.7002 Fair distribution of service on reserved band FM channels.

(b) In an analysis performed pursuant to paragraph (a), a full service FM applicant that will provide the first or second reserved channel noncommercial educational (NCE) aural signal received by at least 10% of the population within the station's 60dBu (1mV/m) service contours will be considered to substantially further fair distribution of service goals and to be superior to mutually exclusive applicants not proposing that level of service, provided that such service to fewer than 2,000 people will be considered insignificant. First service to 2,000 or more people will be considered superior to second service to a population of any size. If only one applicant will provide such first or second service, that applicant will be selected as a threshold matter. If more than one applicant will provide an equivalent level (first or second) of NCE aural service, the size of the population to receive such service from the mutually exclusive applicants will be compared. The applicant providing the most people with the highest level of service will be awarded a construction permit, if it will provide such service to 5,000 or more people than the next best applicant. If none of the applicants in a mutually exclusive group would substantially further fair distribution goals, all

applicants will proceed to examination under a point system. If two or more applicants will provide the same level of service to an equivalent number of people (differing by less than 5,000), only those equivalent applicants will be considered together in a point system.

5. Section 73.7003 is amended by revising adding two new sentences to the end of paragraphs (b)(2) and (c)(1) and adding new paragraphs (e) and (f) to read as follows:

§ 73.7003 Point system selection procedures.

(b) ***

(2) *** Radio applicants will count commercial and noncommercial AM, FM, and FM translator stations other than fill-in stations. Television applicants will count UHF, VHF, and Class A stations.

(c) ***

(1) *** Radio applicants will count commercial and noncommercial AM, FM, and FM translator stations other than fill-in stations. Television applicants will count UHF, VHF, and Class A stations.

(e) For applications filed after April 21, 2000, an applicant's maximum qualifications are established at the time of application and will be reduced for any post-application changes that negatively affect any evaluation criterion.

(f) For applications filed on or before April 21, 2000, applicants will establish their qualifications according to the following: (1) If the applicant is in a group for which a "B" cutoff notice issued prior to April 21, 2000 its maximum non-technical qualifications are established as of the date by which applicants must supplement their applications to supply point information, and its maximum technical qualifications are established as of the date of the "B" cut-off notice; (2) If the applicant is in a group for which an "A" cutoff notice issued prior to April 21, 2000 but for which no "B" cutoff notice issued, its maximum non-technical qualifications are established as of the date by which applicants must supplement their applications to supply point information, and its maximum technical qualifications are established as of April 21, 2000; (3) If the applicant was neither placed on an "A" cut-off list prior to April 21, 2000 nor filed in response to such an "A" cutoff list, it is subject to competition from applications filed within the first filing window, and its maximum technical and non-technical qualifications will be determined as of the close of the first filing window. After the relevant date for determining an applicant's maximum points, points will be reduced for any changes that negatively affect any evaluation criterion.

PART 74 – EXPERIMENTAL RADIO, AUXILIARY, SPECIAL BROADCAST AND OTHER PROGRAM DISTRIBUTIONAL SERVICES

1. The authority citation for part 74 continues to read:

Authority: 47 U.S.C. 154, 303, 334, and 554.

2. Section 74.1233(e)(3) is amended by revising subparagraph (e)(3) to read as follows.

§ 74.1233 Processing FM translator and booster station applications.

(e) * * *

(3)***

- (i) Existing Authorizations. Each applicant's number of existing radio authorizations (licenses and construction permits for AM, FM, and FM-translators but excluding fill-in translators) as of the time of application shall be compared, and the applicant with the fewest authorizations will be chosen as tentative selectee. If each applicant is applying for a fill-in translator only, and consideration of its other radio stations is not dispositive, its number of existing fill-in translator authorizations will also be considered, and the fill-in applicant with the fewest fill-in authorizations will be chosen as tentative selectee.
- (ii) Existing Applications. If a tie remains, after the tie breaker in section (i), the remaining applicant with the fewest pending radio new and major change applications (AM, FM, and non fill-in FM translators) will be chosen as tentative selectee. If each applicant is applying for a fill-in translator only, and consideration of its other radio stations is not dispositive, its number of existing fill-in translator applications will also be considered, and the fill-in applicant with the fewest fill-in authorizations will be chosen as tentative selectee..

APPENDIX C

SUPPLEMENTAL FINAL REGULATORY FLEXIBILITY ANALYSIS

As required by the Regulatory Flexibility Act ("RFA"),⁴⁷ an Initial Regulatory Flexibility Analysis ("IRFA") was incorporated in the Further Notice of Proposed Rulemaking and a Final Regulatory Flexibility Analysis (FRFA) was incorporated in the Report and Order.⁴⁸ This present Supplemental Final Regulatory Flexibility Analysis ("Supplemental FRFA")⁴⁹ conforms to the RFA.⁵⁰

Need For and Objectives of the Memorandum Opinion and Order:

In the Report and Order, the Commission established a point system, a type of simplified paper hearing, to select among applicants competing to construct new noncommercial educational (NCE) broadcast stations on channels reserved for NCE use. The Commission received petitions requesting reconsideration and clarification of a variety of issues. This Memorandum Opinion and Order affirms the use of a point system and the elements therein, but makes the following clarifications: (1) attribution standards applicable to NCE stations are clarified, (2) the stated policy that government entities are considered local throughout their areas of jurisdiction is incorporated into the rules, (3) it is clarified that first and second NCE aural signals received, rather than those licensed to a community, will be considered for the threshold fair distribution analysis and that, if fair distribution is not decisive only equivalent mutually exclusive applications with respect to fair distribution will proceed to be considered under a point system, (4) the manner in which applicants will claim points is clarified, (5) the manner in which to count translator stations is clarified. Additionally, the Memorandum Opinion and Order gives applicants in pending closed groups of mutually exclusive applications a limited opportunity to settle for more than reasonable and prudent expenses.

Summary of Significant Issues Raised by the Public Comments in Response to the FRFA:

No comments were received in **direct** response to the FRFA in MM Docket No. 95-31. Two Petitioners for Reconsideration, while not addressing the FRFA, ask for clarification of whether small community colleges with fewer than five campuses can qualify for state-wide network points. The Memorandum Opinion and Order clarifies that small colleges that form consortiums with other colleges, so that at least five campuses are served, can so qualify. See infra.

⁴⁷ See 5 U.S.C. § 603. The RFA, see 5 U.S.C. § 601 et. seq., has been amended by the Contract with America Advancement Act of 1996, Pub. L. No. 104- 121, 110 Stat. 847 (1996) ("CWAAA"). Title II of the CWAAA is the Small Business Regulatory Enforcement Fairness Act of 1996 ("SBREFA").

⁴⁸ *In the Matter of Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, MM Docket No. 95-31, *Further Notice of Proposed Rule Making*, 13 FCC Rcd 21167 (1998) (Further Notice); *Report and Order*, 15 FCC Rcd 7386 (2000).

⁴⁹ This FRFA conforms to the RFA, as amended by the Contract with America Advancement Act of 1966, Pub. L. 104-121, 110 Stat. 847 (1996) ("CWAAA"). Subtitle II of the CWAAA is The Small Business Regulatory Enforcement Fairness Act of 1996 ("SBREFA").

⁵⁰ See 5 U.S.C. § 604.

Description and Estimate of the Number of Small Entities to Which Rules will Apply: The RFA directs agencies to provide a description of and, where feasible, an estimate of the number of small entities that will be affected by the rules.⁵¹ The RFA generally defines the term “small entity” as having the same meaning as the terms “small organization,” “small business,” and “small governmental jurisdiction.” In addition, the term “small business” has the same meaning as the term “small business concern” under the Small Business Act. See 5 U.S.C. § 601(3); 15 U.S.C. § 632. A small business concern is one which: (1) is independently owned and operated; (2) is not dominant in its field of operation; and (3) satisfies any additional criteria established by the Small Business Administration (“SBA”).⁵² A small organization is generally “any not-for-profit enterprise which is independently owned and operated and is not dominant in its field.”⁵³ Nationwide, as of 1992, there were approximately 275,801 small organizations.⁵⁴ “Small governmental jurisdiction” generally means “governments of cities, counties, towns, townships, villages, school districts, or special districts, with a population of less than 50,000.”⁵⁵ The Census Bureau estimates that this ratio is approximately accurate for all governmental entities. Thus, of the 85,006 governmental entities, we estimate that 81,600 (91 percent) are small entities.

The rules adopted in this Order will apply to television and radio stations licensed to operate on channels reserved as “noncommercial educational.” Specifically, the rules will affect reserved channel FM, FM translator, and TV stations that apply to make major changes to those existing stations and to applicants for permits to construct new reserved channel FM, FM translator, and TV stations. Stations that operate on non-reserved channels, such as TV translator stations and AM stations are not affected. Stations in low power services (LPTV and LPFM) also are not affected.

With respect to television stations, the Small Business Administration defines a television broadcasting station that has no more than \$10.5 million in annual receipts as a small business. Television broadcasting stations consist of establishments primarily engaged in broadcasting visual programs by television to the public, except cable and other pay television services. Television stations that the Federal Communications Commission (FCC) would consider commercial, as well as those that the FCC would consider noncommercial educational, are included in this industry. Also included are other establishments primarily engaged in television broadcasting and which produce taped television program materials. Separate establishments primarily engaged in producing taped television program materials are classified under another SIC number.

For 1992 the total number of television stations that produced less than \$10.0 million in revenue was 1,155 of the 1,509 television stations then operating, both commercial and noncommercial, or 77 percent. As of February 1, 2001, of the 1,667 total television stations, 374 were noncommercial educational. Thus, we estimate that the proposed rules will potentially affect 288 (77 percent of 374) noncommercial educational television stations that are small businesses. These existing stations would only be affected if they file an application for major modification of their existing facilities, and if another applicant files a mutually

⁵¹ 5 U.S.C. § 603(b)(3).

⁵² Small Business Act, 15 U.S.C. § 632 (1996).

⁵³ 5 U.S.C. § 601(4).

⁵⁴ 1992 Economic Census, U.S. Bureau of Census, Table 6 (special tabulation of data under contract to Office of Advocacy of U.S. Small Business Administration).

⁵⁵ 5 U.S.C. § 601(4).

exclusive application. These estimates may overstate the number of small entities since the revenue figures on which they are based do not include or aggregate revenues from non-television affiliated companies. On the other hand they may understate the number of small entities, because we believe that a larger percentage of noncommercial educational stations are small businesses than the percentage applicable to the television industry as a whole. We recognize that the proposed rules may also affect minority and women owned stations, some of which may be small entities. In 1997, minorities owned and controlled 38 (3.2%) of 1,193 commercial television stations in the United States. Comparable figures are not available for noncommercial stations. According to the U.S. Bureau of the Census, in 1987 women owned and controlled 27 (1.9%) of 1,342 commercial and noncommercial television stations in the United States. The proposal would also affect pending and future mutually exclusive applications for noncommercial television stations. As of February 2001, there are currently 89 pending applications for 31 channels reserved for noncommercial educational television usage.

The rules would also affect noncommercial educational radio stations. The SBA defines a radio broadcasting station that has no more than \$5 million in annual receipts as a small business.⁵⁶ A radio broadcasting station is an establishment primarily engaged in broadcasting aural programs by radio to the public.⁵⁷ Radio stations that the Federal Communications Commission (FCC) would consider commercial, as well as those that the FCC would consider noncommercial educational, are included in this industry. Also included are entities which primarily are engaged in radio broadcasting and which produce radio program materials. However, radio stations which are separate establishments and are primarily engaged in producing radio program material are classified under another SIC number. The 1992 Census indicates that 96 percent of radio station establishments produced less than \$5 million in revenue in 1992.⁵⁸ Official Commission records indicate that 11,334 individual radio stations were operating in 1992.⁵⁹ As of February 1, 2001, Commission records indicate that 12,751 radio stations were operating. Of that radio station total, 2,170 stations were noncommercial educational FM radio stations. Thus, we estimate that 2,083 (96%) of these noncommercial educational stations are small businesses, possibly more because we believe that a greater percentage of noncommercial educational stations are small businesses than of the radio industry overall. These existing stations would only be affected by the proposal if they choose to file applications for major modification of facilities and if their applications are mutually exclusive with the application of another noncommercial entity. Applicants for new NCE radio stations would also potentially be affected. As of February 2001 there were 439 pending mutually exclusive groups of 1,356 applications, for new noncommercial FM radio stations. We also note that this proposal will affect future full service FM applications. It also will affect pending and future noncommercial FM translator applicants. As of February 1, 2001 there were 43 pending mutually exclusive groups of 97 applications for reserved channel FM translator stations.

Description of Projected Reporting, Recordkeeping and Other Compliance Requirements:

Most of the provisions of the Report and Order are unchanged by the Memorandum Opinion and Order.

⁵⁶ 13 C.F.R. § 121.201, SIC code 4832.

⁵⁷ 1992 Census, Series UC92-S-1, at Appendix A-9.

⁵⁸ The Census Bureau counts radio stations located at the same facility as one establishment. Therefore, each colocated AM/FM combination counts as one establishment.

⁵⁹ FCC News Release, No. 31327 (January 13, 1993).

As noted in the Report and Order, the point system is expected to reduce the overall administrative burden of the Commission's application processes on applicants and the Commission. Use of a point system will eliminate the expense of preparing for and appearing at lengthy traditional hearings. Applicants should also receive decisions faster, because the Commission will make numerical calculations instead of preparing detailed hearing decisions. These savings should more than offset the time that would be required for applicants to gather and submit documentation supporting the points claimed. No additional professional services are required by applicants filing under these revised rules. Further, the cost of compliance will not vary between large and small entities.

Steps Taken to Minimize Significant Economic Impact on Small Entities, and Significant Alternatives Considered:

All significant alternatives presented in the petitions and responsive comments were considered. The alternatives considered generally would affect all reserved channel applicants, regardless of whether they are small or large entities, and whether they are seeking to construct small or large stations. For example, the Commission considered but did not adopt suggestions to use lotteries rather than a point system, to adjust the previously established qualifications needed to receive various points, and to adopt points for new factors such as radio reading services. While generally affirming the choices made previously in its Report and Order in this proceeding, MM Docket No. 95-31, 15 FCC Rcd 7386 (2000), the Commission clarified various matters. Only one clarification specifically affects small entities. In response to a concern raised by community colleges, the Commission clarified that existing rules permit applicants with fewer than 5 colleges/50 secondary schools of their own to qualify as state-wide networks if through a consortium or similar arrangement they are also able to count schools under the authority of other educators to which they regularly provide curriculum programming. This option may benefit small entities. We expect that there is no significant economic impact on small entities as a result of this clarification. We will continue to consider small entities favorably in the point system, in that they are more likely than large entities to qualify for the points awarded for diversity of ownership, established local entity, and in a tie breaker for number of existing authorizations and applications.

Report to Congress

The Commission will send a copy of the *Memorandum Opinion and Order*, including this Supplemental FRFA, in a report to be sent to Congress pursuant to the Congressional Review Act. See 5 U.S.C. § 801(a)(1)(A). In addition, the Commission will send a copy of this *Memorandum Opinion and Order*, including this Supplemental FRFA, to the Chief Counsel for Advocacy of the Small Business Administration. A copy of the *Memorandum Opinion and Order* and Supplemental FRFA, (or summaries thereof) will also be published in the Federal Register pursuant to 5 U.S.C. § 604(b).

APPENDIX D

CLOSED GROUPS OF PENDING APPLICATIONS

This Appendix identifies mutually exclusive groups of applications for reserved channel noncommercial educational broadcast stations that are not subject to competition from additional applicants. Applications have been studied only to determine mutual exclusivity with applications of the same type, and the appearance of an application on this list does not necessarily mean that it is grantable. Full service FM applications were studied based on technical rules in place at the time of filing. The staff did not consider changes in the protection ratios adopted in Streamlining of Radio Technical Rules, MM Docket No. 98-93 (November 1, 2000), untimely amendments, or post April 21, 2000 amendments. The Appendix is organized by service, with full service television applicants listed first, FM translator applicants second, and full service FM applicants third. Television applicants are listed alphabetically by city. Full service FM applicants are listed by the filing date of the lead applicant. Similarly, FM translator applicants are organized chronologically.

1. TELEVISION CLOSED GROUPS

City, State	Ch.	Applicants	File Nos.
Ames, Iowa	34*	Community Television Educators	BPET-960930KE
		Family Educational Broadcasting, Inc.	BPET-960712KL
		Global Educational Development, Inc.	BPET-960701KE
		Ames Family Television	BPET-960222KF
Anchorage, Alaska	9*	Alaska Public Telecommunications	BPET-961115KE
		Alaska Broadcast TV, Inc.	BPET-960916KE
Bellingham, Washington	34*	State Board for Community Television	BPET-950908KG
		KCTS Television	BPET-951122KT
Clarksdale, Mississippi	21*	Community Television Educators	BPET-970331SD
		Mississippi Authority for Educational TV	BPET-960919KK
Coolidge, Arizona	43*	American Legacy Foundation	BPET-960710LC

		Global Educational Development, Inc.	BPET-960709KP
Corning, New York	30*	Changing Perspectives, Inc. WSKG Public Telecommunications Council	BPET-960401KF BPET-960126KE
Del Rio, Texas	24*	Community Television Educators Faith Pleases God Church, Inc.	BPET-961118KF BPET-960726KM
Des Moines, Iowa	43*	Community Television Educators Community Television, Inc. Family Educational Broadcasting, Inc. Global Educational Development, Inc. Iowa Public Broadcasting Corp. Des Moines Family Television	BPET-960930KF BPET-960724KM BPET-960715KG BPET-960709KT BPET-960508KE BPET-960222KG
Dothan, Alabama	39*	Community Television Educators Acts II Educational Corp., Inc.	BPET-960920KM BPET-970331LQ
Durango, Colorado	20*	Rocky Mountain Public Broadcasting Global Educational Development, Inc.	BPET-961001KP BPET-960709KQ
El Dorado, Arkansas	30*	Kaleidoscope Foundation, Inc. Lamb Broadcasting of Arkansas, Inc.	BPET-970331LG BPET-960920KK
Enid, Oklahoma	26*	Community Television Educators Family Educational Broadcasting, Inc.	BPET-970331SF BPET-960920IQ
Flagstaff, Arizona	16*	Arizona Educational Broadcasting Foundation, Inc.	BPET-961001KK

		Arizona Board of Regents	BPET-960710KT
Hot Springs, Arkansas	20*	Broadcasting for the Challenged Community Television Educational, Inc. Second Baptist Church	BPET-961001KG BPET-960923KH BPET-960520KE
Laredo, Texas	39*	Laredo Community College Faith Pleases God Church, Inc.	BPET-960809KI BPET-960726KK
Logan, Utah	22*	Arizona Educational Broadcasting Foundation, Inc. University of Utah	BPET-961001KL BPET-960627KM
Memphis, Tennessee	14*	Kaleidoscope Foundation, Inc. Cossitt Library Mid-South Public Communications Foundation	BPET-960405KF BPET-960111KZ BPET-950811KE
Memphis, Tennessee	56*	Broadcasting for the Challenged Compassionate Friends Cossitt Library Mid-South Public Communications Foundation Kaleidoscope Foundation, Inc.	BPET-961118KJ BPET-961211KE BPET-961211KK BPET-961212KH BPET-970331LE
Nogales, Arizona	16*	Faith Pleases God Church, Inc. Community Television Educators Broadcasting for the Challenged	BPET-960726KQ BPET-961118KG BPET-961119KH
Ogden, Utah	18*	Global Educational Development, Inc. Faith Pleases God Church, Inc.	BPET-960722KV BPET-960726KR

		Community Television Educators Broadcasting for the Challenged	BPET-961118KE BPET-961119KK
Palatka, Florida	42*	Community Television Educators WJCT, Inc. Compassionate Friends Educational Network	BNPET-960923AAL BPET-960724KQ BPET-960920WY
Raleigh, North Carolina	34*	Achievement School, Inc. Community Television, Inc.	BPET-960920WJ BPET-960628KM
Salt Lake City, Utah	26*	Community Television Educators Global Educational Development, Inc. Kaleidoscope Foundation, Inc. Broadcasting for the Challenged	BPET-970331SE BPET-960917KH BPET-970331LL BPET-970331SB
Santa Fe, New Mexico	9*	Global Educational Development, Inc. Regents of the University of New Mexico	BPET-960709KO BPET-961001KJ
Seattle, Washington	62*	KCTS Television Washington Family Broadcasting Association	BPET-951207KJ BPET-960726KO
Senatobia, Mississippi	34*	Family Educational Broadcasting, Inc. Oral Roberts University Broadcasting of the Challenged Global Educational Development, Inc.	BPET-960716KF BPET-960724KL BPET-961001KI BPET-960701KF
Tulsa, Oklahoma	63*	Oral Roberts University Creative Educational Media Corp., Inc.	BPET-960621KE BPET-960701KG

		Global Educational Development, Inc.	BPET-960917KE
		Family Educational Broadcasting, Inc.	BPET-960927KE
		Community Television Educators	BPET-960930KG
		Faith Pleases God Church, Inc.	BPET-961001KE
		Broadcasting for the Challenged	BPET-961001KH
Waverly, New York	57*	WSKG Public Telecommunications	BPET-961213KE
		Changing Perspectives, Inc.	BPET-961213KF
Weaverville, California	32*	Northern California Public Television	BPET-960920KV
		Redding Institute of Religion	BPET-970324KE
Wichita, Kansas	42*	Way of the Cross of Hutchinson, Inc.	BPET-960528KP
		Faith Pleases God Church, Inc.	BPET-960726KJ
		Oral Roberts University	BPET-960920KJ
		Community Television Educators	BPET-960930KH
Wichita, Kansas	15*	President's College, Inc.	BPET-960423KE
		Oral Roberts University	BPET-960724KP
		Community Television Educators	BPET-960930KI

2. FM TRANSLATOR CLOSED GROUPS

GROUP #	FILE NUMBER	CITY	ST	APPLICANT NAME
grp001	BPFT 19960731TB	PUEBLO	CO	CALVARY CHAPEL OF TWIN FALLS
grp001	BPFT 19970116TB	PUEBLO	CO	PIKES PEAK COMMUNITY COLLEGE
grp002	BPFT 19970606TE	EDGEMONT	CO	EDUCATIONAL MEDIA FOUNDATION
grp002	BPFT 19971014TC	EDGEMONT	CO	WAY-FM MEDIA GROUP, INC.
grp003	BPFT 19970624TA	MOBERLY	MO	AMERICAN FAMILY ASSOCIATION
grp003	BPFT 19971016TC	MOBERLY	MO	COMMUNITY BROADCASTING, INC.
grp004	BPFT 19970911TH	ST. JOSEPH	MO	EDUCATIONAL MEDIA FOUNDATION
grp004	BPFT 19980219TA	ST. JOSEPH	MO	COMMUNITY BROADCASTING, INC.
grp004	BPFT 19980220TG	ST. JOSEPH	MO	PENSACOLA CHRISTIAN COLLEGE, INC.
grp005	BPFT 19981102TQ	CHARLOTTESVILLE	VA	COMMONWEALTH PUB B'CASTING CORP
grp005	BPFT 19980720TC	CROZET	VA	CALVARY CHAPEL OF TWIN FALLS, INC.
grp006	BPFT 19990505TD	TRACY	CA	UNIVERSITY OF THE PACIFIC
grp006	BPFT 19981102TR	TRACY	CA	EDUCATIONAL MEDIA FOUNDATION
grp007	BPFT 19990129TG	SANTA PAULA/CAMARILL	CA	LIVING WAY MINISTRIES, INC.
grp007	BPFT 19990621TF	SANTA PAULA	CA	CA STATE UNIVERSITY AT NORTHRIDGE
grp008	BPFT 19990412TE	NEWHALL	CA	LIVINGWAY MINISTRIES, INC.
grp008	BPFT 19990426TF	SANTA SUSANA	CA	LIVING WAY MINISTRIES, INC.
grp008	BPFT 19990609TC	RAYMER	CA	LIVING WAY MINISTRIES, INC.
grp008	BPFT 19990621TE	AGOURA HILLS	CA	CA STATE UNIVERSITY OF NORTHRIDGE
grp008	BPFT 19990129TH	AGOURA HILLS	CA	LIVING WAY MINISTRIES, INC.

grp009	BPFT	19990204TE	BRUSH	CO	EDU. COMMUNICAT. OF CO SPRINGS, INC.
grp009	BPFT	19990730TB	BRUSH	CO	COLORADO CHRISTIAN UNIVERSITY
grp010	BPFT	19990415TF	POST FALLS	ID	LIVING WAY MINISTRIES, INC.
grp010	BPFT	19990913TC	COEUR D'ALENE	ID	SPOKANE PUBLIC RADIO
grp011	BPFT	19990419TA	ARLINGTON	FL	CALVARY CHAPEL OF TWIN FALLS, INC.
grp011	BPFT	19990902TC	STOCKADE	FL	COMMUNITY PUBLIC RADIO
grp012	BPFT	19990430TB	BRENTWOOD	TN	CALVARY CHAPEL OF TWIN FALLS, INC.
grp012	BPFT	19990913TB	BRENTWOOD	TN	MIDDLE TENNESSEE STATE UNIVERSITY
grp013	BPFT	19990506TA	EDMOND	OK	CALVARY CHAPEL OF TWIN FALLS, INC.
grp013	BNPFT	19991019AAG	EDMOND	OK	COMMUNITY PUBLIC RADIO, INC.
grp014	BNPFT	19991018AAH	LINCOLN PARK	CO	EDUC COMMUNICATIONS OF CO SPRINGS, INC.
grp014	BPFT	19990528TB	LINCOLN PARK	CO	CALVARY CHAPEL OF TWIN FALLS, INC.
grp015	BPFT	19990614TB	OPAL CITY	OR	PACIFIC CASCADE COMMS. CORP.
grp015	BPFT	19990225TA	PRINEVILLE	OR	CALVARY CHAPEL OF TWIN FALLS, INC.
grp016	BPFT	19990701TE	RAYTOWN	MO	LIVING WAY MINISTRIES, INC.
grp016	BNPFT	20000120AAY	RAYTOWN	MO	CALVARY CHAPEL OF TWIN FALLS, INC.
grp016	BNPFT	20000330ABW	RAYTOWN	MO	COMMUNITY BROADCASTING, INC.
grp017	BPFT	19990727TD	CAVE JUNCTION	OR	PACIFIC CASCADE COMMNS. CORP.
grp017	BNPFT	20000303AAX	CAVE JUNCTION	OR	SOUTHERN OREGON UNIVERSITY
grp018	BPFT	19990809TB	WEEHAWKEN	NJ	LIVING WAY MINISTRIES, INC
grp018	BNPFT	19991130AAO	UNION CITY	NJ	PENSACOLA CHRISTIAN COLLEGE, INC.
grp019	BPFT	19990813TD	LIVINGSTON	TX	FAMILY WORSHIP CENTER CHURCH, INC.
grp019	BNPFT	20000301ABR	GOODRICH	TX	PACIFICA FOUNDATION

grp020	BPFT 19990820TH	NEWPORT	OR	CALVARY CHAPEL OF TWIN FALLS, INC.
grp020	BNPFT 20000113AAF	OTTER ROCK	OR	CATHOLIC BROADCASTING NORTHWEST, INC.
grp020	BMPFT20001215ABD	FLORENCE	OR	CALVARY CHAPEL OF TWIN FALLS, INC.
grp021	BPFT 19990831TC	NEW CASTLE	CO	EDUCATIONAL COMNS OF CO SPRINGS, INC
grp021	BNPFT 20000118ABO	GLENWOOD SPRINGS CO	CO	COLORADO CHRISTIAN UNIVERSITY
grp022	BPFT 19990910TD	EDENTON	NC	FAMILY WORSHIP CENTER CHURCH, INC.
grp022	BNPFT 20000223AAX	EDENTON	NC	GRACE CHRISTIAN SCHOOL
grp023	BNPFT 19990920AAQ	HUNTSVILLE	TX	FAMILY WORSHIP CENTER CHURCH, INC.
grp023	BNPFT 20000301ABV	HUNTSVILLE	TX	PACIFICA FOUNDATION
grp024	BNPFT 19990921AAJ	NARBERTH	PA	WORLD REVIVALS, INC.
grp024	BNPFT 20000118AEF	NARBERTH	PA	CALVARY CHAPEL OF TWIN FALLS, INC.
grp025	BPFT 19990910TE	ELIZABETH CITY	NC	FAMILY WORSHIP CENTER CHURCH, INC.
grp025	BNPFT 20000223ABK	ELIZABETH CITY	NC	GRACE CHRISTIAN SCHOOL
grp025	BNPFT 20000224ABG	ELIZABETH CITY	NC	CALVARY CHAPEL OF TWIN FALLS, INC.
grp026	BPFT 19990910TG	MONROE	NC	FAMILY WORSHIP CENTER CHURCH, INC.
grp026	BNPFT 20000223ABH	MONROE	NC	GRACE CHRISTIAN SCHOOL
grp027	BNPFT 19991005AAO	FARMINGTON	NM	PAULINO BERNAL EVANGELISM
grp027	BNPFT 19991022AAE	FARMINGTON	NM	YOUR CHRISTIAN COMPANION, INC.
grp028	BNPFT 19991020AAF	TAMPA	FL	THE MOODY BIBLE INSTITUTE OF CHICAGO
grp028	BNPFT 19991020AAG	OLDSMAR	FL	RADIO TRAINING NETWORK, INC.
grp028	BNPFT 20000302ABP	CLEARWATER	FL	FAITH PLEASES GOD CHURCH CORP.
grp029	BNPFT 19991029AAD	PENDLETON	OR	CALVARY CHAPEL OF TWIN FALLS, INC.
grp029	BNPFT 20000424ABU	PENDLETON	OR	OREGON PUBLIC BROADCASTING
grp030	BNPFT 19991104AAD	MEDINA	MN	PENSACOLA CHRISTIAN COLLEGE, INC.
grp030	BNPFT 20000316AAE	MINNEAPOLIS	MN	MINNESOTA PUBLIC RADIO

grp031	BNPFT 19991104AAE	BREHAM	TX	KSBJ EDUCATIONAL FOUNDATION
grp031	BNPFT 20000330ABV	BREHAM	TX	IXOYE PRODUCTIONS, INC.
grp032	BNPFT 19991129AAD	HOLLY SPRINGS	GA	PENSACOLA CHRISTIAN COLLEGE, INC.
grp032	BNPFT 20000103AAV	LEBANON	GA	CALVARY CHAPEL OF TWIN FALLS, INC.
grp033	BNPFT 20000511AAW	WARNER ROBINS	GA	COMMUNITY PUBLIC RADIO, INC.
grp033	BNPFT 19991203AAF	WARNER ROBINS	GA	PENSACOLA CHRISTIAN COLLEGE, INC.
grp034	BNPFT 20000515AAO	EL PASO	TX	LIFE CHALLENGE INTERNATIONAL, INC.
grp034	BNPFT 19991203AAH	EL PASO	TX	EDUCATIONAL MEDIA FOUNDATION
grp035	BNPFT 20000515ABC	KINGSPORT	TN	WAY-FM MEDIA GROUP, INC.
grp035	BNPFT 19991206AAE	KINGSPORT	TN	EDUCATIONAL MEDIA FOUNDATION
grp036	BNPFT 20000407ABL	ELKO	NV	FAITH PLEASES GOD CHURCH CORP.
grp036	BMJPFT 19991220AAA	ELKO	NV	CALVARY CHAPEL OF TWIN FALLS, INC.
grp037	BNPFT 20000419AAJ	WESTVILLE	CT	CONNECTICUT PUBLIC BROADCASTING, INC.
grp037	BNPFT 20000516AAH	WOODBIDGE	CT	LIVING WAY MINISTRIES, INC.
grp037	BNPFT 19991227AAN	WESTVILLE	CT	SACRED HEART UNIVERSITY, INC.
grp038	BNPFT 20000407AAR	GAINESVILLEGA		FAITH PLEASES GOD CHURCH CORP
grp038	BNPFT 20000516AAG	GAINESVILLEGA		LIVING WAY MINISTRIES, INC.
grp038	BNPFT 19991228ABE	GAINESVILLEGA		COMMUNITY PUBLIC RADIO, INC.
grp039	BNPFT 20000515ABD	DELTA, ETC	FL	WAY-FM MEDIA GROUP, INC.
grp039	BNPFT 19991229AAU	NORTH PALM BEACH	FL	PENSACOLA CHRISTIAN COLLEGE, INC.
grp040	BNPFT 20000410AAE	RAPID CITY	SD	EDUCATIONAL MEDIA FOUNDATION
grp040	BNPFT 20000103AAX	RAPID CITY	SD	CALVARY CHAPEL OF TWIN FALLS, INC.
grp041	BNPFT 20000320AAK	SEDONA	AZ	CALVARY CHAPEL OF TWIN FALLS, INC.
grp041	BNPFT 20000107ABP	FLAGSTAFF	AZ	YOUR CHRISTIAN COMPANION, INC.

grp042	BNPFT 20000119ACI DALHART	TX	FAMILY WORSHIP CENTER CHURCH, INC.
grp042	BNPFT 20000112AAA DALHART	TX	GREAT PLAINS CHRISTIAN RADIO
grp043	BNPFT 20000313AAM DICKSON	TN	CALVARY CHAPEL OF TWIN FALLS, INC.
grp043	BNPFT 20000114AAS DICKSON	TN	FAMILY WORSHIP CENTER CHURCH, INC.

3. FULL SERVICE FM CLOSED GROUPS

= See Text of MO&O, Section IV(H)(3) re: Terminated Hearing Cases

% = Dismissal Reversed and Remanded to Commission in "State of Oregon v. FCC," 102 F. 3d 583 (DC Cir. 1996)

* = Appeal currently under review

MX GROUP NUMBER	LEAD CUTOFF DATE			FILE NUMBER	CITY	ST	APPLICANT
88031E	08/22/84	A	BPED	19840322CA	BATON ROUGE	LA	REAL LIFE ED FOUND OF BATON ROUGE #
88031E			BPED	19840822IF	BATON ROUGE	LA	JIMMY SWAGGART MINISTRIES #
84091E	05/31/89	A	BPED	19840907IB	OJAI	CA	FAMILY STATIONS, INC.
84091E		B	BPED	19890526MF	OJAI	CA	EDUCATIONAL B/C OF VENTURA COUNTY
84091E		B	BPED	19890530MB	SANTA BARBARA	CA	KCBX, INC.
84091E		B	BPED	19890531MD	OJAI	CA	SHEPHERD COMMUNICATIONS, INC.
880611	01/10/90	A	BPED	19880610ML	REDDING	CA	THE UNIV.FOUND. CA STATE UNIV, CHICO
880611		B	BPED	19900129MH	REDDING	CA	STATE OF OREGON %
89101E	12/07/93	A	BPED	19891019MA	CROWN POINT	IN	HYLES-ANDERSON COLLEGE
89101E		B	BPED	19910409MF	CROWN POINT	IN	THE MOODY BIBLE INSTITUTE
90032E			BPED	19910617ID	BOSTON	MA	TRUSTEES OF BOSTON UNIVERSITY
90032E	06/17/91	A	BPED	19900327MG	NEW LONDON	CT	CONNECTICUT COLLEGE BROADCAST ASSN.

92102E	03/24/93	A	BPED	19921026MA	WHITEHALL	OH	LOU SMITH MINISTRIES, INC.
92102E		A	BPED	19921029MB	COLUMBUS	OH	CHRISTIAN BROADCASTING SERVICES, INC
92102E		B	BPED	19921104MA	COLUMBUS	OH	THE CEDARVILLE COLLEGE
93041E	12/07/93	A	BPED	19930423MA	BOISE	ID	PEOPLE OF ACTION
93041E		B	BPED	19931206MB	MIDDLETON	ID	SOUTHERN IDAHO CORPORATION
93041E		B	BPED	19931207MD	BOISE	ID	CALVARY CHAPEL OF TWIN FALLS, INC.
93112E	04/20/94	A	BPED	19931112MD	NORTH DARTMOUTH	MA	UNIVERSITY OF MASSACHUSETTS
93112E		B	BPED	19940420MB	NORTH DARTMOUTH	MA	GRANITE STATE EDUC. FELLOWSHIP, INC
94065E	04/17/95	A	BPED	19940629MC	WICHITA FALLS	TX	CAMERON UNIVERSITY
94065E		B	BPED	19950417MT	WICHITA FALLS	TX	NORTH TEXAS PUBLIC BROADCASTING, INC
9406SX	07/06/95	A	BPED	19940624MA	MARIANNA	FL	MARIANNA EDUC. B/CNG FOUNDATION
9406SX		B	BPED	19941122MK	THOMASVILLE	GA	SOUTHEAST EDUCATIONAL RADIO, INC.
941007			BMPED	19950629ID	TITUSVILLE	FL	FLORIDA PUBLIC RADIO, INC.
941007	10/23/96	B	BMPED	19951011MK	KISSIMMEE	FL	HISPANIC BROADCAST SYSTEMS, INC.
94106E	07/14/95	A	BPED	19941026MA	NORMAN	OK	AMERICAN FAMILY ASSOCIATION
94106E		B	BPED	19950714MD	NORMAN	OK	SISTER SHERRY LYNN FOUNDATION INC
941116	03/28/96	A	BPED	19941114MA	ASHLAND	KY	AMERICAN FAMILY ASSOCIATION
941116		B	BPED	19950524MF	HURRICANE	WV	HURRICANE BIBLE CHURCH
941116		B	BPED	19960328MC	ASHLAND	KY	POSITIVE ALTERNATIVE RADIO, INC.
941116		B	BPED	19960328MI	HURRICANE	WV	POSITIVE ALTERNATIVE RADIO, INC.
94111E	04/17/95	A	BPED	19941121MA	FLINT CITY	AL	NORTH ALABAMA EDU. FOUNDATION

94111E		B	BPED	19950215MA	TRINITY	AL	AMERICAN FAMILY ASSOCIATION
94111E		B	BPED	19950413ME	HARVEST	AL	SOUTHWEST FL COMMUNITY RADIO, INC
94112E	05/11/95	A	BPED	19941221MD	EFFINGHAM	IL	BD OF TRUSTEES, SOUTHERN IL UN
94112E		B	BPED	19941110MA	CASEY	IL	WORD POWER, INC.
94112E		B	BPED	19941229MA	CHARLESTON	IL	WISCONSIN VOICE/ CHRIST. YOUTH, INC
94112E		B	BPED	19950126MC	SALEM	IL	AMERICAN FAMILY ASSOCIATION
94114E	11/08/95	A	BPED	19941103MC	BRISTOL	VA	AMERICAN FAMILY ASSOCIATION
94114E		B	BPED	19951023IB	EMORY	VA	EMORY & HENRY COLLEGE
94114E		B	BPED	19951108NC	BRISTOL	VA	VIRGINIA TECH FOUNDATION, INC.
94123E		B	BPED	19950213MB	OTTUMWA	IA	IOWA ST UN OF SCIENCE & TECHNOLOGY
94123E	05/24/95	A	BPED	19941209MB	OTTUMWA	IA	GRASSROOTS BROADCASTING, CO., INC.
94123E		B	BPED	19950515ML	FAIRFIELD	IA	AMERICAN FAMILY ASSOCIATION
950120	05/24/95	A	BPED	19950117MB	PASCAGOULA	MS	AMERICAN FAMILY ASSOCIATION
950120		B	BPED	19950329MC	PASCAGOULA	MS	JUDAH BROADCASTING NETWORK, INC.
950120		B	BPED	19950524MI	PRICHARD	AL	MOODY BIBLE INSTITUTE OF CHICAGO
950215	05/03/96	A	BPED	19950210MA	MCCLOUD	CA	SOUTHERN OREGON STATE COLLEGE
950215		B	BPED	19960503MG	MCCLOUD	CA	FATIMA RESPONSE INC DBA
95026E	12/06/95	A	BPED	19950206NB	CHAMPLAIN	NY	NEW YORK EDUCATIONAL BROADCASTERS
95026E		B	BPED	19951206MB	SCHUYLER FALLS	NY	CHRISTIAN MINISTRIES INC.
95031E	07/14/95	A	BPED	19950327MA	REDDING	CA	CHRISTIAN ARTS AND EDUCATION, INC.
95031E		B	BPED	19950713MB	REDDING	CA	ST OF OR ACTING & THROUGH THE ST BD
95031E		B	BPED	19950714ME	REDDING	CA	EDUCATIONAL MEDIA FOUNDATION INC

95031E		B	BPED	19950714MF	RED BLUFF	CA	TEHAMA COUNTY COMMUNITY BR'CASTERS
950331			BPED	19971126MC	LOMPOC	CA	CSN INTERNATIONAL
950331			BPED	19971202MB	COALINGA	CA	FAMILY STATIONS INC
950331	12/02/97	A	BPED	19970328MD	SANTA MARIA	CA	PEOPLE OF ACTION
95058E	01/18/96	A	BPED	19950530MB	PORTAGEVILLE	MO	WORD OF VICTORY OUTREACH CENTER INC
95058E		B	BPED	19950626MB	BLYTHEVILLE	AR	AMERICAN FAMILY ASSOCIATION
95059E	01/18/96	A	BPED	19950512MA	MESQUITE	NV	SOUTHERN NEVADA ED BROADCASTERS
95059E		B	BPED	19960118MK	LAS VEGAS	NV	NEVADA PUBLIC RADIO CORPORATION
95061E	04/18/96	A	BPED	19950608MB	BEAUFORT	NC	APPALACHIAN EDUCATIONAL COMMUN CORP.
95061E		B	BPED	19950928MD	BEAUFORT	NC	AMERICAN FAMILY ASSOCIATION
95062E	03/28/96	A	BPED	19950628MA	LYNCHBURG	VA	POSITIVE ALTERNATIVE RADIO, INC
95062E		B	BPED	19960327MA	LYNCHBURG	VA	VISION COMMUNICATIONS INC
95062E		B	BPED	19960328MD	RUSTBURG	VA	EDUCATIONAL MEDIA CORPORATION
95064E	12/15/95	A	BPED	19950615MZ	BENTONVILLE	AR	AMERICAN FAMILY ASSOCIATION
95064E		B	BPED	19951215MF	NEOSHO	MO	BRIDGE BUILDERS EDUC. ASSOCIATION
95072E	01/18/96	A	BPED	19950718MA	TAHOE CITY	CA	THOMAS ACQUINAS SCHOOL
95072E		B	BPED	19951113MB	RENO	NV	STOCKTON CHISTIAN LIFE COLLEGE
95072E		B	BPED	19951127MA	RENO	NV	BD OF REGENTS / UN OF NV – TRUCKEE
95072E		B	BPED	19960118MH	HAWTHORNE	NV	AMERICAN EDUCATIONAL BROADCASTING
95075E	01/18/96	A	BPED	19950724ME	GREENVILLE	TX	AMERICAN FAMILY ASSOCIATION
95075E		B	BPED	19960118MG	GREENVILLE	TX	SISTER SHERRY LYNN FOUNDATION, INC.

95076E	12/15/95	A	BPED	19950711MB	PERRY	IA	AMERICAN FAMILY ASSOCIATION
95076E		B	BPED	19951215ME	PERRY	IA	IOWA STATE UNIV. OF SCIENCE & TECH
95077E			BPED	19960416MB	TEHAMA	CA	N VALLEY ED COMMUNITY RADIO INC
95077E	04/18/96	A	BPED	19950720MA	PARADISE	CA	NORTHERN CA ED BROADCASTERS
95077E		B	BPED	19960417MD	BURNEY	CA	OREGON STATE BOARD OF HIGHER ED.
95083E	04/18/96	A	BPED	19950814MA	HONOLULU	HI	BIBLE BROADCASTING NETWORK, INC
95083E		B	BPED	19960416MA	HONOLULU	HI	CALVARY CHAPEL OF HONOLULU, INC
95083E		B	BPED	19960418MB	KANEOHE	HI	MAKA'AINANA BROADCASTING CO, LTD
95093E	04/18/96	A	BPED	19950905MG	AURORA	NC	DOWN EAST PUBLIC RADIO, INC
95093E		B	BPED	19960417MB	AURORA	NC	FRIENDS OF DOWN E PUBLIC RADIO INC
95094E	04/04/96	A	BPED	19950906MM	ST. MARTINVILLE	LA	AMERICAN FAMILY ASSOCIATION
95094E		B	BPED	19960404MA	ABBEVILLE	LA	COMMUNITY RADIO ALLIANCE
95095E	05/03/96	A	BPED	19950905MD	BECKLEY	WV	SHOFAR BROADCASTING CORPORATION
95095E		B	BPED	19960502MH	BECKLEY	WV	POSITIVE ALTERNATIVE RADIO, INC.
95102E			BPED	19960429IC	CHARLOTTE	NC	UNIVERSITY RADIO FOUNDATION, INC.
95102E	05/03/96	A	BPED	19951027ME	WILKESBORO	NC	WILKES COMMUNITY COLLEGE
95111E	05/17/96	A	BPED	19951128MA	PRINCESS ANNE	MD	MARANATHA INC.
95111E		B	BPED	19960516ME	OCEAN CITY	MD	EXEC. COMM. BD. OF TRUST OF AMER. U
951129	05/17/96	A	BPED	19951129MA	ST. JOSEPH	MO	AMERICAN FAMILY ASSOCIATION
951129		B	BPED	19951121MF	ST. JOSEPH	MO	BAPTIST TEMPLE SCHOOL

951129		B	BPED	19960514MA	ST. JOSEPH	MO	GOOD NEWS MINISTRIES, INC.
951129		B	BPED	19960517MG	ST. JOSEPH	MO	COMMUNITY BROADCASTING, INC.
95124E	07/12/96	A	BPED	19951208MB	TUCSON	AZ	EDUCATIONAL MEDIA FOUNDATION
95124E		A	BPED	19960229MA	MAMMOTH	AZ	MAMMOTH EDUCATIONAL FOUNDA, INC
95124E		B	BPED	19960517MF	TUCSON	AZ	FAMILY LIFE BROADCASTING, INC.
95124E		B	BPED	19960712MA	TUCSON	AZ	AMERICAN ED BROADCASTING INC
95124E		B	BPED	19960712MH	GLOBE	AZ	AMERICAN ED BROADCASTING INC
960121			BPED	19970626MA	PLACERVILLE	CA	AMERICAN FAMILY ASSOCIATION
960121			BPED	19970626MC	CAMINO	CA	CHRISTIAN COMPANION NETWORK, INC.
960121			BPED	19970626MD	POLLOCK PINES	CA	HOWELL MOUNTAIN BROADCASTING CO.
960121	06/26/97	A	BPED	19960118MM	POLLOCK PINES	CA	AMERICAN EDUCATIONAL BROADCASTING
960122	06/19/96	A	BPED	19960118MJ	ARDMORE	OK	CAMERON UNIVERSITY
960122		B	BPED	19960404MB	ADA	OK	AMERICAN FAMILY ASSOCIATION
96014E	08/22/96	A	BPED	19960116ML	JASPER	IN	GOOD SAMARITAN EDUCATIONAL RADIO, IN
96014E		B	BPED	19960423MB	OWENSBORO	KY	BOWLING GREEN COMMUNITY BROADC/G INC
960206	10/23/96	A	BPED	19960206MD	KLAMATH FALLS	OR	EDUCATIONAL MEDIA FOUNDATION
960206		B	BPED	19961022MA	KLAMATH FALLS	OR	ST BD OF HIGHER ED & FOR SOUTHERN
9602AA	09/05/96	A	BPED	19960209MB	CHARLESTON	IL	VCY/AMERICA, INC.
9602AA		B	BPED	19960905MA	CHARLESTON	IL	ILLINOIS BIBLE INSTITUTE INC
9602AA		B	BPED	19960905ME	MARTINSVILLE	IL	WORD POWER, INC
960303	06/19/96	A	BPED	19960325MD	CHEHALIS	WA	WASHINGTON STATE UNIVERSITY
960303		B	BPED	19960619ME	LITTELL	WA	SHEPHERD COMMUNICATIONS, INC.

960304	06/19/96	A	BPED	19960328MH	MADISONVILLE	KY	BOARD OF REGENTS, MURRAY STATE UNIV.
960304		A	BPED	19960619MD	MADISONVILLE	KY	LIFE ANEW MINISTRIES, INC.
960308	04/17/97	A	BPED	19960326MB	BAKER	FL	OKALOOSA PUBLIC RADIO, INC.
960308		B	BPED	19970417MC	THOMASVILLE	AL	NATIONWIDE INSPRIATIONAL B/G
960310	02/20/97	A	BPED	19960328MA	PENSACOLA	FL	FLORIDA PUBLIC RADIO, INC.
960310		B	BPED	19970220MD	PANAMA CITY	FL	BIBLE BROADCASTING NETWORK INC
960310		B	BPED	19960923MC	PANAMA CITY	FL	AMERICAN FAMILY ASSOCIATION
960315	08/22/96	A	BPED	19960312MA	OTTUMWA	IA	GLASSROOTS BROADCASTING COMPANY, INC
960315		B	BPED	19960820MC	OTTUMWA	IA	UNIVERSITY OF NORTHERN IOWA
96032E	08/22/96	A	BPED	19960307MD	PONCA CITY	OK	THE LOVE STATION, INC,
96032E		B	BPED	19960524MB	STILLWATER	OK	AMERICAN FAMILY ASSOCIATION
96036E	08/22/96	A	BPED	19960307ME	SEBRING	FL	RADIO TRAINING NETWORK, INC.
96036E		B	BPED	19960820MB	SEBRING	FL	THE MOODY BIBLE INSTITUTE OF CHICAGO
96036E		B	BPED	19960822MA	CLEWISTON	FL	AMERICAN ED BROADCASTING INC
96039E	07/12/96	A	BPED	19960328ME	WAUBUN	MN	NIJII BROADCAST CORPORATION
96039E		B	BPED	19960712MG	SEBEKA	MN	LIFETALK BROADCASTING ASSOCIATION
960406	10/23/96	A	BPED	19960412MB	COWETA	OK	CREATIVE EDUCATIONAL MEDIA CORP., INC.
960406		B	BPED	19960412MA	TULSA	OK	THE UNIVERSITY OF TULSA
96054E	09/26/96	A	BPED	19960521MA	WESTMINSTER	CO	S W FLORIDA COMMUNITY RADIO INC
96054E		B	BPED	19960926MD	LAKWOOD	CO	COLORADO CHRISTIAN UNIVERSITY INC

96054E		B	BPED	19960926ME	WESTMINSTER	CO	EDUCATIONAL MEDIA FOUNDATION
96059E	12/17/96	A	BPED	19960523MZ	RALEIGH	NC	NORTH CAROLINA STATE UNIVERSITY
96059E		B	BPED	19961217MD	ELON COLLEGE	NC	ELON COLLEGE
96064E	10/23/96	A	BPED	19960607MC	CLARKSVILLE	TN	AMERICAN FAMILY ASSOCIATION
96064E		B	BPED	19960729MB	CLARKSVILLE	TN	CEN-TENN COMMUNICATIONS, INC.
96064E		B	BPED	19961021MB	CLARKSVILLE	TN	WAY-FM MEDIA GROUP INC.
960606	03/12/97	B	BPED	19961023MA	KAPLAN	LA	NORTH ALABAMA EDUC. FOUNDATION
960606	03/12/97	B	BPED	19961023MG	BROUSSARD	LA	MARY V. HARRIS FOUNDATION
960709	12/03/96	A	BPED	19960710MA	LAKE CITY	TN	AMERICAN FAMILY ASSOCIATION
960709		B	BPED	19961203ME	NEWPORT	TN	BIBLE BELIEVERS NETWRK INC
960710	12/17/96	A	BPED	19960724MG	LONGVIEW	TX	AMERICAN FAMILY ASSOCIATION
960710		B	BPED	19960920ME	JEFFERSON	TX	HOUSTON CHRISTIAN BROADCASTERS INC
960710		B	BPED	19961217ME	WHITE OAK	TX	EDUC. RADIO FNDTN OF E. TEXAS, INC.
9607B1	11/12/96	A	BPED	19960705MB	WESTDALE	LA	AMERICAN FAMILY ASSOCIATION
9607B1		B	BPED	19960814MD	COTTON VALLEY	LA	ED RADIO FOUNDATION OF E TX INC
9607B1		B	BPED	19961031MA	JONESBORO	LA	AMERICAN FAMILY ASSOCIATION
9607B1		B	BPED	19961112MC	BLANCHARD	LA	MISSIONARY ACTION PROJECTS
9607B3			BPED	19961112MD	LOVELAND	CO	COLORADO CHRISTINA UNIVERSITY
9607B3			BPED	19961112ME	FORT COLLINS	CO	S.W. FLORIDA COMMUNITY RADIO, INC.
9607B3			BPED	19961112MF	EATON	CO	EDUCATIONAL MEDIA FOUNDATION
9607B3	11/12/96	A	BPED	19960731MA	FORT COLLINS	CO	PUBLIC RADIO FOR THE FRONT RNGE

960811	03/13/97	A	BPED	19960918ME	PARRISH	AL	AMERICAN FAMILY ASSOCIATION
960811		B	BPED	19960819MC	TUSCALOOSA	AL	THE MOODY BIBLE OF CHICAGO
960812	03/13/97	A	BPED	19960830ME	MADISONVILLE	TX	HOUSTON CHRISTIAN BROADCASTERS, INC.
960812			BPED	19970108MH	CROCKETT	TX	AMERICAN FAMILY ASSOCIATION
960813		B	BPED	19970312MC	BETTENDORF	IA	AUGUSTANA COLLEGE
960813	03/13/97	A	BPED	19960805MA	KEWANEE	IL	AMERICAN FAMILY ASSOCIATION
960813		B	BPED	19960927MA	BETTENDORF	IA	UNIVERSITY OF NORTHERN IOWA
960815			BPED	19970312MD	HUDSON	TX	LUFKIN EDUCATIONAL B/CING FOUNDATION
960815			BPED	19970417MA	ATHENS	TX	AMERICAN FAMILY ASSOCIATION
960815			BPED	19970417MB	BEAUMONT	TX	AMERICAN ED BROADCASTING INC
960815			BPED	19970417MG	WACO	TX	AMERICAN ED BROADCASTING INC
960815	04/17/97	A	BPED	19960830MF	LUFKIN	TX	HOUSTON CHRISTIAN BROADCASTERS, INC.
960820	02/20/97	A	BPED	19960826ME	MANHATTAN	KS	AMERICAN FAMILY ASSOCIATION
960820		B	BPED	19970220MC	MANHATTAN	KS	BIBLE BROADCASTING NETWORK INC
96086E	01/09/97	A	BPED	19960806MA	FAYETTEVILLE	NC	AMERICAN FAMILY ASSOCIATION
96086E		B	BPED	19970109MG	FAYETTEVILLE	NC	BIBLE BROADCASTING NETWORK INC
96086E		B	BPED	19970109MN	WADE	NC	COVENANT ED FELLOWSHIP INC
96088E	01/09/97	A	BPED	19960802MF	ADA	OK	AMERICAN FAMILY ASSOCIATION
96088E		B	BPED	19970109ME	SHAWNEE	OK	THE LOVE STATION INC
96088E		B	BPED	19970109MM	ADA	OK	SISTER SHERRY LYNN FOUNDATION INC
960903	03/13/97	A	BPED	19960910MB	ST. JOSEPH	MO	AMERICAN FAMILY ASSOCIATION
960903		B	BPED	19970313MA	SAVANNAH	MO	COMMUNITY BROADCASTING INC

960903		B	BPED	19970313MM	ST. JOSEPH	MO	CALVARY CHAPEL /ST. JOSEPH, MO. INC
960904	03/13/97	A	BPED	19960906MA	GLENWOOD SPRINGS	CO	PUBLIC BROADCASTING OF CO INC
960904		B	BPED	19970312MA	CARBONDALE	CO	PITKIN COUNTY
960908	05/16/97	A	BPED	19960920MA	LANCASTER	NY	HOLY FAMILY COMMUNICATIONS, INC.
960908			BPED	19970516MA	WILLIAMSVILLE	NY	MARY V. HARRIS FOUNDATION *
960911	03/27/97	A	BPED	19960911MH	CAIRO	GA	AMERICAN FAMILY ASSOCIATION
960911		B	BPED	19970326MB	QUINCY	FL	OKALOOSA PUBLIC RADIO, INC.
96097X	03/27/97	A	BPED	19960930MA	WENATCHEE	WA	THE MOODY BIBLE INITIUTE OF CHICAGO
96097X		B	BPED	19970327MC	EAST WENATCHEE	WA	DOUGLAS COUNTY ED RADIO ASSOCIATION
9609R1	04/17/97	A	BPED	19960924MF	MART	TX	AMERICAN FAMILY ASSOCIATION
9609R1		B	BPED	19970131MA	WACO	TX	UNIV. OF TEXAS AT AUSTIN KUT RADIO
9609R1		B	BPED	19970417ME	TEMPLE	TX	AMERICAN ED BROADCASTING INC
961010	03/13/97	A	BPED	19961028MB	PIEDMONT	OK	THE LOVE STATION, INC.
961010		B	BPED	19970110MD	YUKON	OK	EDUCATIONAL MEDIA FOUNDATION
961010		B	BPED	19970226MB	EL RENO	OK	AMERICAN FAMILY ASSOCIATION
961010		B	BPED	19970313MD	PIEDMONT	OK	COMMUNITY BROADCASTING INC
961010		B	BPED	19970313ML	CRESCENT	OK	PENSACOLA CHRISTIAN COLLEGE, INC
961011	03/27/97	A	BPED	19961010MC	FAIRFIELD	IA	AMERICAN FAMILY ASSOCIATION
961011		B	BPED	19970321MB	FAIRFIELD	IA	UNIVERSITY OF NORTHERN IOWA
961012	03/13/97	A	BPED	19961024MD	PERALTA	NM	EDUCATIONAL MEDIA FOUNDATION
961012		B	BPED	19970312MB	GRANTS	NM	AMERICAN FAMILY ASSOCIATION

961012		B	BPED	19970313IE	ALBUQUERQUE	NM	BOARD OF REGENTS UNIV. OF NEW MEXICO
961012		B	BPED	19970313MB	GRANTS	NM	FAMILY STATIONS INC
961120		B	BPED	19971121MG	MILFORD	NH	KNOWLEDGE FOR LIFE
961120	04/17/97	A	BPED	19961122MB	NORWICH	VT	NH PUBLIC RADIO/VERMONT
961120		B	BPED	19961224MA	NASHUA	NH	NEW HAMPSHIRE PUBLIC RADIO, INC.
961120		B	BPED	19970417MJ	PETERBOROUGH	NH	NORTHEASTERN ED RADIO FELLOWSHIP INC
961121	04/17/97	A	BPED	19961104MD	PEACHTREE CITY	GA	COMMUNITY PUBLIC RADIO, INC.
961121		B	BPED	19970407MD	PEACHTREE CITY	GA	AMERICAN FAMILY ASSOCIATION
961121		B	BPED	19970416MB	GRIFFIN	GA	SECOND BAPTIST CHURCH INC
961121		B	BPED	19970416ME	PEACHTREE CITY	GA	AUGUSTA RADIO FELLOWSHIP INSTITUTE
961121		B	BPED	19970416MF	PEACHTREE CITY	GA	LIFE RADIO MINISTRIES INC
961122	05/09/97	A	BPED	19961129MN	BENTON	MO	AMERICAN FAMILY ASSOCIATION
961122		B	BPED	19970508MD	JACKSON	MO	I G W T COMMUNITY RADIO INC
961126	07/25/97	A	BPED	19961105MA	WAVERLY	IA	AMERICAN FAMILY ASSOCIATION
961126		B	BPED	19970210MD	WAVERLY	IA	WARTBURG COLLEGE
961127	05/09/97	A	BPED	19961114MB	GOODLAND TOWNSHIP	MI	SUPERIOR COMMUNICATIONS
961127		B	BPED	19970508MG	IMLAY CITY	MI	GOSPEL RADIO INTERNATIONAL, INC.
961208	06/13/97	A	BPED	19961231MA	FOLKSTONE	NC	FAMILY RADIO NETWORK INC
961208		B	BPED	19970612ME	JACKSONVILLE	NC	AMERICAN FAMILY ASSOCIATION
961208		B	BPED	19970613MC	SNEADS FERRY	NC	PRAISE BROADCASTING NETWORK, INC.
961209			BPED	19970625MD	GALAX	VA	POSITIVE ALTERNATIVE RADIO, INC.
961209	06/26/97	A	BPED	19961218MB	MOUNT AIRY	NC	AMERICAN FAMILY ASSOCIATION

961210	06/26/97	A	BPED	19961223ME	SANTA MARIA	CA	CALVARY CHAPEL OF SAN LUIS OBISPO INC
961210		B	BPED	19970626MB	SANTA MARIA	CA	PEOPLE OF ACTION
961210		B	BPED	19970626ME	SANTA MARIA	CA	FAMILY STATIONS, INC.
970108	05/09/97	A	BPED	19970123MA	HIAWATHA	IA	FRIENDSHIP COMMUNICATIONS INC
970108		B	BPED	19970508MC	ANAMOSA	IA	UNIVERSITY OF NORTHERN IOWA
970108		B	BPED	19970509MB	CEDAR RAPIDS	IA	AMERICAN FAMILY ASSOCIATION
970109		B	BPED	19970807MU	INDIANOLA	MS	BROADCASTING FOR THE CHALLENGED INC
970109	08/07/97	A	BPED	19970129MA	INDIANOLA	MS	AMERICAN FAMILY ASSOCIATION
970110	08/07/97	A	BPED	19970109MF	LAYTONVILLE	CA	REDWOOD COMMUNITY RADIO INC
970110		B	BPED	19970807MV	LAYTONVILLE	CA	CSN INTERNATIONAL
970111	08/07/97	A	BPED	19970108MI	OTTUMWA	IA	AMERICAN FAMILY ASSOCIATION
970111		B	BPED	19970321MA	OTTUMWA	IA	UNIVERSITY OF NORTHERN IOWA
970112	08/07/97	A	BPED	19970127ME	UTICA	NY	SOULS HARBOR UNITED PENTECOSTAL
970112		B	BPED	19970807MM	REMSSEN	NY	WAMC
970113	08/07/97	A	BPED	19970113MB	KIRKSVILLE	MO	AMERICAN FAMILY ASSOCIATION
970113		B	BPED	19970806MA	KIRKSVILLE	MO	GREAT COMMISSION BROADCASTING CORP
970120	12/02/97	A	BPED	19970110MB	NASHVILLE	AR	AMERICAN FAMILY ASSOCIATION
970120		B	BPED	19971202MA	FORT SMITH	AR	FAMILY STATIONS INC
970209	05/09/97	A	BPED	19970212MB	ITHACA	NY	WSKG PUBLIC TELECOM COUNCIL
970209		B	BPED	19970411MC	ITHACA	NY	THE COLLEGES OF THE SENECA

970210	08/07/97	A	BPED	19970203ME	MCCONNELLSBURG	PA	MORRIS B/CASTING & COMMUN. INC.
970210		B	BPED	19970422MB	SHIPPENSBURG	PA	SHIPPENSBURG UNIV. OF PENNSYLVANIA
970210		B	BPED	19970806MC	MIDDLETON	PA	FOUR RIVERS COMMUNITY B'CASTING *
970211			BPED	19970709MF	SHERMAN	TX	AMERICAN FAMILY ASSOCIATION
970211			BPED	19970807MD	DENISON	TX	DENISON EDUCATIONAL FOUNDATION
970211			BPED	19970807MK	DENISON	TX	RESEARCH ED FOUNDATION INC
970211	08/07/97	A	BPED	19970219MA	DENISON	TX	BIBLE BROADCASTING NETWORK INC
970214	07/25/97	A	BPED	19970228MA	FRANKFORT	IN	AMERICAN FAMILY ASSOCIATION
970214		B	BPED	19970723MZ	LAFAYETTE	IN	HYMN TIME, INC
970215	08/28/97	A	BPED	19970203MB	FANNETT	TX	AMERICAN FAMILY ASSOCIATION
970215		B	BPED	19970828MJ	FANNETT	TX	DENISON EDUCATIONAL FOUNDATION
970216	08/07/97	A	BPED	19970211MB	CUBA CITY	WI	AMERICAN FAMILY ASSOCIATION
970216		B	BPED	19970226MA	DUBUQUE	IA	UNIVERSITY OF NORTHERN IOWA
970216		B	BPED	19970807ML	CUBA CITY	WI	POSITIVE PROGRAMMING FOUNDATION
970217			BPED	19980224MB	FLORENCE	SC	FRANCIS MARION UNIVERSITY
970217			BPED	19980225MF	MARION	SC	MARY V. HARRIS FOUNDATION
970217			BPED	19980225MI	BROWNSVILLE	SC	FAMILY RADIO NETWORK INC.
970217			BPED	19980225MP	DILLON	SC	CSN INTERNATIONAL
970217	02/25/98	A	BPED	19970220MB	DILLON	SC	AMERICAN FAMILY ASSOCIATION
970218			BPED	19971211MF	HAYFORK	CA	AMERICAN ED BROADCASTING INC
970218			BPED	19971211MH	MCKINLEYVILLE	CA	HOWELL MOUNTAIN BROADCASTING CO.
970218			BPED	19971211MI	GARBERVILLE	CA	FAMILY STATIONS INC

970218	12/11/97	A	BPED	19970228MB	EUREKA	CA	PACIFIC CASCADE COMMUNICATIONS CORP.
970219	08/07/97	A	BPED	19970203MA	CHICKASHA	OK	AMERICAN FAMILY ASSOCIATION
970219		B	BPED	19970807MY	CHICKASHA	OK	SISTER SHERRY LYNN FOUNDATION INC
970304	07/25/97	A	BPED	19970324MA	COACHELLA	CA	CREATIVE EDUCATIONAL MEDIA CORP.
970304			BPED	19970725MH	COACHELLA	CA	SHEPHERD COMMUNICATIONS, INC.
970305	07/25/97	A	BPED	19970725ML	LONGVIEW	WA	FAMILY STATIONS, INC.
970305			BPED	19970318MA	PINE GROVE	OR	EDUCATIONAL MEDIA FOUNDATION
970305			BPED	19970625ME	GRESHAM	OR	MT. HOOD COMMUNITY COLLEGE DISTRICT
970306	08/28/97	A	BPED	19970527IE	HOUSTON	TX	PACIFICA FOUNDATION
970306			BPED	19970304MB	BRENHAM	TX	AMERICAN FAMILY ASSOCIATION
970306			BPED	19970828MA	COLLEGE STATION	TX	HYMN TIME, INC.
970310	10/10/97	A	BMPED	19970303IB	BEREA	OH	BALDWIN-WALLACE COLLEGE
970310			BPED	19970311MA	PAINESVILLE	OH	LA CADENA MUNDIAL HISPANA, INC.
970312	12/11/97	A	BPED	19970331MA	ESKO	MN	LINCOLN HIGH SCHOOL ESKO, MINNESOTA
970312			BPED	19971211MC	SUPERIOR	WI	ST OF WI EDUCATIONAL COMM. BOARD
970312			BPED	19971211MN	WENTWORTH	WI	AMERICAN FAMILY ASSOCIATION
970313	09/19/97	A	BPED	19970311MB	JORDAN VALLEY	OR	EDUCATIONAL MEDIA FOUNDATION
970313			BPED	19970919ME	PARMA	ID	SO. ID CORP. OF 7TH DAY ADVENTISTS *
970411			BPED	19971001MC	HUEYTOWN	AL	AMERICAN FAMILY ASSOCIATION
970411			BPED	19971009MD	NORTHPORT	AL	MARY V HARRIS FOUNDATION
970411			BPED	19971010MA	CONCORDE	AL	ALABAMA HERITAGE ASSOCIATION

970411			BPED	19971010MF	BESSEMER	AL	BROADCASTING FOR THE CHALLENGED INC
970411	10/10/97	A	BPED	19970424MA	BESSEMER	AL	THE MOODY BIBLE INSTITUTE OF CHICAGO
970414	09/19/97	A	BPED	19970416MC	RAPID CITY	SD	AMERICAN FAMILY ASSOCIATION
970414		B	BPED	19970918MI	RAPID CITY	SD	BETHESDA CHRISTIAN BROADCASTING INC
970415	08/07/97	A	BPED	19970418MO	ASHLAND	VA	APPOMATTOX ED FOUNDATION
970415		B	BPED	19970806MB	RICHMOND	VA	AMERICAN FAMILY ASSOCIATION
970415		B	BPED	19970807MN	ASHLAND	VA	BROADCASTING FOR THE CHALLENGED INC
970416	05/29/98	B	BPED	19971104MG	NEW BERLIN	IL	REFORMED BROADCASTING NETWORK, INC
970416	05/29/98	B	BPED	19971112MC	TAYLORVILLE	IL	BIBLE BROADCASTING NETWORK INC
9704AX	05/29/98	A	BPED	19970418MN	ELIZABETH CITY	NC	CSN INTERNATIONAL
9704AX		B	BPED	19980319ML	ELIZABETH CITY	NC	AMERICAN FAMILY ASSOCIATION
9704AX		B	BPED	19980528MF	ELIZABETH CITY	NC	ELIZABETH EDUCATIONAL INCORPORATED
9704AX		B	BPED	19980529MJ	ELIZABETH CITY	NC	BROADCASTING FOR THE CHALLENGED INC
9704P3	01/09/98	A	BPED	19970501MB	COLUMBUS	IN	GOOD SAMARITAN ED RADIO INC
9704P3		B	BPED	19970403MJ	NASHVILLE	IN	AMERICAN FAMILY ASSOCIATION
970510	08/28/97	A	BPED	19970519MA	PLAQUEMINE	LA	AMERICAN FAMILY ASSOCIATION
970510			BPED	19970828ME	PLAQUEMINE	LA	MARY V. HARRIS FOUNDATION
970511	09/19/97	A	BPED	19970512MA	GREAT FALLS	MT	AMERICAN FAMILY ASSOCIATION
970511		B	BPED	19970918ME	GREAT FALLS	MT	PENSACOLA CHRISTIAN COLLEGE, INC.
970512	09/19/97	A	BPED	19970501MZ	LEVELLAND	TX	AMERICAN FAMILY ASSOCIATION
970512			BPED	19961206ME	MORTON	TX	MORTON COCHRAN CONUNT ED. FOUND.

970514	09/19/97	A	BPED	19970501MF	NEW HAVEN	IN	AMERICAN FAMILY ASSOCIATION
970514		B	BPED	19970919MB	LAFAYETTE TOWNSHIP	IN	SOUTHWEST ALLEN COUNTY SCHOOLS
970516	09/19/97	A	BPED	19970513MD	FREER	TX	PAULINO BERNAL EVANGELISM
970516		B	BPED	19970918MD	FREER	TX	GOODNEWS BROADCASTING OF TEXAS
970517		B	BPED	19971001MA	GOSHEN	IN	AMERICAN FAMILY ASSOCIATION
970517		B	BPED	19971009MC	WAKARUSA	IN	BIBLE BROADCASTING NETWORK INC
970517	10/10/97	A	BPED	19970521MD	GOSHEN	IN	PENSACOLA CHRISTIAN COLLEGE INC
970518	11/14/97		BPED	19970602MC	LEMOORE	CA	LEMOORE UNION HIGH SCHOOL DISTRICT
970518			BPED	19971112MB	SELMA	CA	EDUCATIONAL MEDIA FOUNDATION
970518			BPED	19971114MM	HANFORD	CA	FAMILY STATIONS, INC
970519	11/14/97	A	BPED	19970522MC	CAPE MAY COURT HOUSE	NJ	MARANATHA MINISTRIES
970519		B	BPED	19971010MD	CAPE MAY COURTHOUSE	NJ	PENSACOLA CHRISTIAN COLLEGE INC
970520	11/14/97	A	BPED	19970505MC	MARION	IA	AMERICAN FAMILY ASSOCIATION
970520		B	BPED	19971030MN	CENTER POINT	IA	FLORIDA PUBLIC RADIO, INC
970520		B	BPED	19971110MC	MARION	IA	UNIVERSITY OF NORTHERN IOWA
970520		B	BPED	19971114ME	MARION	IA	BROADCASTING FOR THE CHALLENGED INC
970521	11/14/97	A	BPED	19970523MJ	RIDGECREST	CA	LIVING PROOF INC
970521		B	BPED	19971114MG	CHINA LAKE	CA	FAMILY STATIONS INC
970522	12/11/97	A	BPED	19970507MA	CHEYENNE	WY	AMERICAN FAMILY ASSOCIATION
970522		B	BPED	19971210MA	CHEYENNE	WY	BROADCASTING FOR THE CHALLENGED INC

970523		B	BPED	19980109MG	NORCO	LA	BROADCASTING FOR THE CHALLENGED INC
970523	01/09/98	A	BPED	19970528MD	NORCO	LA	AMERICAN FAMILY ASSOCIATION
970524	01/09/98	A	BPED	19970516MC	DE QUINCY	LA	AMERICAN FAMILY ASSOCIATION
970524		B	BPED	19980108MJ	SULPHUR	LA	BROADCASTING FOR THE CHALLENGED, INC
970604	11/14/97	A	BPED	19970606MB	PUEBLO	CO	FAMILY STATIONS, INC.
970604		A	BPED	19970702MC	RYE	CO	HARVEST RADIO CORPORATION
970604		B	BPED	19970702MG	RYE	CO	HARVEST RADIO CORPORATION
970604		B	BPED	19971112MD	WESTCLIFFE	CO	ED COMMUNICATIONS OF CO SPRINGS INC
970604		B	BPED	19971114MC	COLORADO CITY	CO	BROADCASTING FOR THE CHALLENGED INC
970604		B	BPED	19971110MB	COLORADO SPRINGS	CO	EDUCATIONAL COMM. OF CO SPRINGS, INC
970604		B	BPED	19971112ME	WALSENBURG	CO	ED COMMUNICATIONS OF CO SPRINGS INC
970605			BPED	19971007IG	STOCKTON	CA	YOUR CHRISTIAN COMPANION NETWORK, INC.
970605			BPED	19971113MD	LODI	CA	EDUCATIONAL MEDIA FOUNDATION
970605	11/14/97	A	BPED	19970612ML	RIO VISTA	CA	RIVER DELTA UNIFIED SCHOOL DISTRICT
970608	11/14/97	A	BPED	19970609MF	VICTORIA	TX	PAULINO BERNAL EVANGELISM
970608		B	BPED	19970918MC	VICTORIA	TX	GOODNEWS BROADCASTING OF TEXAS
970608		B	BPED	19971114MA	BLOOMINGTON	TX	HOUSTON CHRISTIAN BROADCASTERS INC
970608		B	BPED	19971114MB	VICTORIA	TX	BROADCASTING FOR THE CHALLENGED INC
970609			BPED	19980727MC	PANA	IL	PANA PUBLIC RADIO INC
970609	07/29/98	A	BPED	19980121MF	PANA	IL	AMERICAN FAMILY ASSOCIATION
970622	12/11/97	A	BPED	19970630MA	SELMA	AL	MOODY BIBLE INSTITUTE OF CHICAGO
970622		B	BPED	19971211MA	SELMA	AL	BROADCASTING FOR THE CHALLENGED INC

970623	12/11/97	A	BPED	19970620MD	ORCHARD VALLEY	WY	EDUCATIONAL MEDIA FOUNDATION
970623		B	BPED	19970703ME	CHEYENNE	WY	AMERICAN FAMILY ASSOCIATION
970623		B	BPED	19971117MK	FORT COLLINS	CO	PUBLIC RADIO FOR THE FRONT RANGE
970623		B	BPED	19971209M1	LOVELAND	CO	COLORADO CHRISTIAN UNIVERSITY
970623		B	BPED	19971210MB	ORCHARD VALLEY	WY	BROADCASTING FOR THE CHALLENGED, INC
970624	01/09/98	A	BPED	19970617MA	KALISPELL	MT	STOCKTON CHRISTIAN LIFE COLLEGE INC
970624		B	BPED	19980108MF	KALISPELL	MT	BROADCASTING FOR THE CHALLENGED, INC
970625	01/09/98	A	BPED	19970620MF	LAMONT	CA	EDUCATIONAL MEDIA FOUNDATION
970625		B	BPED	19970915ME	WASCO	CA	AMERICAN FAMILY ASSOCIATION
970625		B	BPED	19980109MI	BAKERSFIELD	CA	FAMILY STATIONS, INC.
970625		B	BPED	19980109MK	ARVIN	CA	BROADCASTING FOR THE CHALLENGED INC
970625		B	BPED	19980109MN	WASCO	CA	MARY V HARRIS FOUNDATION
970626			BPED	19980109MJ	MIDLAND	TX	BROADCASTING FOR THE CHALLENGED INC
970626	01/09/98	A	BPED	19970623MA	MIDLAND	TX	PAULINO BERNAL EVANGELISM
970628	01/09/98	A	BPED	19970603MB	BROWNSVILLE	TN	HAYWOOD COUNTY BOARD OF EDUCATION
970628		B	BPED	19980108MI	BROWNSVILLE	TN	BROADCASTING FOR THE CHALLENGED, INC
970630	03/20/98	A	BPED	19970630MC	PEORIA	IL	PINEBROOK FOUNDATION, INC.
970630		B	BPED	19970703MF	PEORIA	IL	AMERICAN FAMILY ASSOCIATION
970630		B	BPED	19980319MG	PEORIA	IL	BROADCASTING FOR THE CHALLENGED, INC.
970630		B	BPED	19980319MJ	PEORIA	IL	SIRIUS SYNCOPE INC.
970631			BPED	19980318MD	PONCA	NE	ST. GABRIEL COMMUNICATIONS LTD.
970631	05/12/98	A	BPED	19970612MH	HUBBARD	NE	AMERICAN FAMILY ASSOCIATION

970726	04/20/98	A	BPH	19970728MA	STRASBURG	CO	J P I RADIO INCORPORATED
970726		B	BPED	19970814MA	STRASBURG	CO	BROADCASTING OF THE CHALLENGED INC
970726		B	BPED	19980417MI	STRASBURG	CO	CSN INTERNATIONAL
970726		B	BPED	19980420MJ	STRASBURG	CO	MARY V. HARRIS FOUNDATION
970730	01/09/98	A	BPED	19970716MA	MISSOULA	MT	MOODY BIBLE INSTITUTE OF CHICAGO
970730		B	BPED	19970915MD	MISSOULA	MT	AMERICAN FAMILY ASSOCIATION
970730		B	BPED	19980108MH	MISSOULA	MT	BROADCASTING FOR THE CHALLENGED, INC
970730		B	BPED	19980109MQ	BUTTE	MT	FAMILY STATIONS INC
970733	02/25/98	A	BPED	19970701MA	NEW BEDFORD	MA	NEW BEDFORD CHRISTIAN RADIO, INC.
970733			BPED	19980225MC	NEW BEDFORD	MA	BROADCASTING FOR THE CHALLENGED, INC
970737		B	BPED	19980107MC	LEBANON	TN	CUMBERLAND UNIVERSITY
970737		B	BPED	19980109MR	BOWLING GREEN	KY	WESTERN KENTUCKY UNIVERSITY
970737	01/09/98	A	BPED	19970728MB	PORTLAND	TN	NASHVILLE CHAMBER OF COMMERCE
970738	01/23/98	A	BPED	19970714MB	VAIL	CO	PUBLIC BROADCASTING OF COLORADO, INC
970738		B	BPED	19980122MA	VAIL	CO	BROADCASTING FOR THE CHALLENGED INC
970738		B	BPED	19980123MO	VAIL	CO	DENVER ED BROADCASTING INC
970739	05/10/99	A	BPED	19970707MA	MADISON	FL	PUBLIC RADIO, INC.
970739			BPED	19990510MF	MONTICELLO	FL	EDUCATIONAL MEDIA FOUNDATION
970739			BPED	19990510ML	MONTICELLO	FL	FM 91.9, INC.
970814	03/20/98	A	BPED	19970804MD	NANTUCKET	MA	NANTUCKET PUBLIC RADIO INC
970814		B	BPED	19980319MH	NANTUCKET	MA	BROADCASTING FOR THE CHALLENGED, INC.

970815	01/09/98		BPED	19980108MG	MONROEVILLE	AL	OKALOOSA PUBLIC RADIO, INC.
970815			BPED	19980226MD	MONROEVILLE	AL	AMERICAN FAMILY ASSOCIATION
970817	01/09/98	A	BPED	19970801MH	SIOUX FALLS	SD	AMERICAN FAMILY ASSOCIATION
970817		B	BPED	19980106MB	SIOUX FALLS	SD	CSN INTERNATIONAL
970817		B	BPED	19980108MK	SIOUX FALLS	SD	BROADCASTING FOR THE CHALLENGED, INC
970823	02/25/98	A	BPED	19970820MA	RATHDRUM	ID	AMERICAN FAMILY ASSOCIATION
970823		B	BPED	19980219MA	POST FALLS	ID	KOOTENAI COUNTY BAPTIST CHURCH
970823		B	BPED	19980224MA	SPOKANE	WA	SPOKANE PUBLIC RADIO INC.
970823		B	BPED	19980225MB	RATHDRUM	ID	BROADCASTING FOR THE CHALLENGED INC.
970823		B	BPED	19980225MH	RATHDRUM	ID	MARY V. HARRIS FOUNDATION
970823		B	BPED	19980225MO	RATHDRUM	ID	CSN INTERNATIONAL
970824	02/25/98	A	BPED	19970818MB	LUMPKIN	GA	SPANISH CULTURAL EDUCATION, INC.
970824		B	BPED	19980225MD	AMERICUS	GA	FAMILY STATIONS INC.
970826			BPED	19980611ME	KINGMAN	AZ	AMERICAN FAMILY ASSOCIATION
970826			BPED	19980619MH	KINGMAN	AZ	BROADCASTING FOR THE CHALLENGED INC.
970826			BPED	19980619MK	KINGMAN	AZ	MOHAVE COMMUNITY COLLEGE
970826	06/19/98	A	BPED	19970822MA	KINGMAN	AZ	CSN INTERNATIONAL
970830			BPED	19980317MA	KEY WEST	FL	S. F. BROADCASTING CORP.
970830			BPED	19980318MF	KEY WEST	FL	BROADCASTING OF THE CHALLENGED INC.
970830	03/20/98	A	BPED	19970815MA	KEY WEST	FL	GOOD IDEA INCORPORATED
97091E	01/23/98	A	BPED	19970910MC	CLARKSTON	WA	UPPER COLUMBIA MEDIA ASSOCIATION
97091E		B	BPED	19980123MB	ASOTIN	WA	LIVING FAITH FELLOWSHIP ED MINISTERIE

970928			BPED	19980226MB	BURAS	LA	EMPIRE BROADCASTING INC
970928	02/25/98	A	BPED	19970903MA	BURAS	LA	AMERICAN FAMILY ASSOCIATION
970929			BPED	19980320MK	MASSEY	MD	UNIVERSITY OF MD EASTERN SHORE
970929	03/20/98	A	BPED	19970915MB	HARRINGTON	DE	AMERICAN FAMILY ASSOCIATION
970929		B	BPED	19980320MD	HARRINGTON	DE	EAGLE'S NEST FELLOWSHIP CHURCH
970929		B	BPED	19980320MM	HARRINGTON	DE	MARY V. HARRIS FOUNDATION
970929		B	BPED	19980320MP	DENTON	MD	POSITIVE ALTERNATIVE RADIO INC
970930	03/20/98	A	BPED	19970915MA	BISMARCK	ND	AMERICAN FAMILY ASSOCIATION
970930		B	BPED	19980320ME	BISMARCK	ND	FAMILY STATIONS INC.
970931	03/20/98	A	BPED	19970909MD	COOS BAY	OR	THE STATE OF OREGON
970931			BPED	19980318MI	ROSEBURG	OR	WILLIAM PATRICK DONNELLY MINISTRIES, INC.
970931			BPED	19980318MJ	EMIGRANT VALLEY	OR	EMIGRANT VALLEY PUBLIC RADIO, INC.
970931			BPED	19980319MM	HORNBROOK	CA	OREGON EDUCATIONAL RADIO SERVICES, INC.
970931			BPED	19980319MN	HORNBROOK	CA	HORNBROOK DEVELOPMENT CENTER, INC.
970931			BPED	19980319MO	EMIGRANT VALLEY	OR	EMIGRANT VALLEY CHRISTIAN CHURCH
970931			BPED	19980320ML	COOS BAY	OR	CSN INTERNATIONAL
970932			BPED	19971202IB	RICHMOND	VA	CENTRAL VIRGINIA EDUC. TV CORP.
970932			BPED	19980311MD	CAPE CHARLES	VA	AMERICAN FAMILY ASSOCIATION
970932			BPED	19980318MH	HEATHSVILLE	VA	CENTRAL VA ED TELECOMM. CORPORATION
970932			BPED	19980319MD	BELLE HAVEN	VA	MARY V. HARRIS FOUNDATION
970932			BPED	19980319MF	CAPE CHARLES	VA	BROADCASTING FOR THE CHALLENGED, INC.
970932			BPED	19980320MI	CAPE CHARLES	VA	STOCKTON CHRISTIAN LIFE COLLEGE INC
970932		B	BPED	19980320MJ	CHERITON	VA	DELMARVA EDUCATIONAL ASSOCIATION
970932			BPED	19980320MN	EASTVILLE	VA	BY THE CAPE BROADCASTING INC.
970932	03/20/98	A	BPED	19970903MB	CAPE CHARLES	VA	EDUCATIONAL MEDIA CORPORATION

970932		A	BPED	19971015MB	MATHEWS	VA	HAMPTON ROADS ED TELECOM ASSOC. INC
970933	05/12/98	A	BPED	19970919MD	POCOLA	OK	EDUCATIONAL MEDIA FOUNDATION
970933		B	BPED	19980512MS	POCOLA	OK	BROADCASTING FOR THE CHALLENGED INC
970935			BPED	19980617ME	LAKEPORT	CA	LAKE COUNTY COMMUNITY RADIO INC
970935			BPED	19980618MB	REDWOOD VALLEY	CA	REDWOOD VALLEY BROADCASTERS INC.
970935			BPED	19980619MI	LAYTONVILLE	CA	FAMILY STATIONS INC
970935			BPED	19980619ML	REDWOOD VALLEY	CA	STOCKTON CHRISTIAN LIFE COLLEGE
970935	06/19/98	A	BPED	19970917ME	REDWOOD VALLEY	CA	EDUCATIONAL MEDIA FOUNDATION
970936	03/20/98	A	BPED	19970929MB	TRIMBLE	CO	ED COMMUNICATIONS OF COLORADO SPRINGS, INC.
970936		B	BPED	19980319ME	DURANGO	CO	PUBLIC BROADCASTING OF COLORADO INC.
970937	05/29/98	A	BPED	19980306MC	FARMINGTON	MO	BD OF REGENTS, SE MISSOURI STATE UNIV.
970937		A	BPED	19970925ME	PERRYVILLE	MO	EVANGELISTIC CENTER
970937		B	BPED	19980529MH	FARMINGTON	MO	BROADCASTING FOR THE CHALLENGED INC
970938	07/07/98	A	BPED	19970917MA	SCOTTS HILL	NC	FAMILY RADIO NETWORK INC
970938		B	BPED	19980210MB	LOCK FOLLY TOWNSHIP	NC	GRACE MISSIONARY BAPTIST CHURCH
970938		B	BPED	19980701MA	SCOTTS HILL	NC	BROADCASTING FOR THE CHALLENGED, INC
970938		B	BPED	19980707MB	OGDEN	NC	NORTH CAROLINA PUBLIC BROADCAST INC
970939			BPED	19981125MB	DESCHUTES RIVER	OR	WILLIAM PATRICK DONNELLY MINISTRIES, INC.
970939			BPED	19981127MD	BEND	OR	JESUIT MISSION, INC.
970939			BPED	19981203MO	REDMOND	OR	CSN INTERNATIONAL
970939		B	BPED	19980605MD	REDMOND	OR	ST OF OREGON, ST BD OF HIGHER ED
970939		B	BPED	19981203MF	SISTERS	OR	LANE COMMUNITY COLLEGE
970939	12/03/98	A	BPED	19970925MF	SISTERS	OR	EDUCATIONAL MEDIA FOUNDATION

970940			BPED	19980812MI	ASPEN	CO	ASPEN PUBLIC RADIO INC.
970940			BPED	19980813MD	NEW CASTLE	CO	EDUC. COMMUN. OF COLORADO SPRINGS, I
970940			BPED	19980814MH	GLENWOOD SPRINGS	CO	PITKIN COUNTY
970940	08/14/98	A	BPED	19970924MH	GLENWOOD SPRINGS	CO	PUBLIC BROADCASTING OF COLORADO INC
970944			BPED	19990506ME	RAEFORD	NC	BROADCASTING FOR THE CHALLENGED, INC
970944	05/10/99	A	BPED	19970925MB	RAEFORD	NC	AMERICAN FAMILY ASSOCIATION
971013			BPED	19980415MB	SIDNEY	CO	BROADCASTING FOR THE CHALLENGED, INC.
971013			BPED	19980417MC	GYPSUM	CO	COLORADO CHRISTIAN UNIVERSITY
971013	04/20/98	A	BPED	19971014MB	SIDNEY	CO	ED COMMUNICATIONS OF CO SPRINGS INC
971014		B	BPED	19971017MA	RAPID CITY	SD	BETHESDA CHRISTIAN BROADCASTING INC
971014			BPED	19980417MB	RAPID CITY	SD	CSN INTERNATIONAL
971014			BPED	19980420MG	RAPID CITY	SD	FAMILY STATIONS INC.
971014	04/20/98	A	BPED	19971020MB	RAPID CITY	SD	AMERICAN FAMILY ASSOCIATION
971015	04/20/98	A	BPED	19971009MA	MARSHALLTOWN	IA	AMERICAN FAMILY ASSOCIATION
971015		B	BPED	19980417MH	MARSHALLTOWN	IA	MARSHALLTOWN ED PLUS INC.
971016	05/12/98	A	BPED	19971016MC	RANDOM LAKE	WI	ST OF WI ED COMMUNICATIONS BOARD
971016		B	BPED	19980506MD	PLYMOUTH	WI	AMERICAN FAMILY ASSOCIATION
971016		B	BPED	19980512ME	KIEL	WI	JUBILATION MINISTRIES INC
971016		B	BPED	19980512MG	FOND DU LAC	WI	CORNERSTONE COMMUNITY RADIO, INC.
971017	05/12/98	A	BPED	19971008MA	HASTINGS	NE	AMERICAN FAMILY ASSOCIATION
971017		B	BPED	19980512MH	GRAND ISLAND	NE	STOCKTON CHRISTIAN LIFE COLLEGE, INC
971017		B	BPED	19980512MQ	HASTINGS	NE	BROADCASTING FOR THE CHALLENGED INC

971018	05/12/98	A	BPED	19971016MD	BEND	OR	COMMUNICATIONS ADVISOR BD OF THE DIO
971018		B	BPED	19980327MA	BEND	OR	PENSACOLA CHRISTIAN COLLEGE INC
971018		B	BPED	19980417MF	BEND	OR	CSN INTERNATIONAL
971018		B	BPED	19980430MB	BEND	OR	AMERICAN FAMILY ASSOCIATION
971018		B	BPED	19980512MA	LA PINE	OR	EDUCATIONAL MEDIA FOUNDATION
971019			BPED	19980204MA	COATESVILLE	PA	AMERICAN FAMILY ASSOCIATION
971019			BPED	19980512MB	COATESVILLE	PA	FAMILY STATIONS INC
971019			BPED	19980512MF	COATESVILLE	PA	TEMPLE UN OF THE COMMONWEALTH SYS OF
971019			BPED	19980512MI	MORGANTOWN	PA	FOUR RIVERS COMMUNITY B/CASTING CORP
971019	05/12/98	A	BPED	19971009ME	COATESVILLE	PA	MERCER COUNTY COMMUNICTY COLLEGE
971022			BPED	19981005ME	KUNA	ID	BROADCASTING FOR THE CHALLENGED, INC
971022			BPED	19981006MC	TWIN FALLS	ID	YOUR CHRISTIAN COMPANION NETWORK, INC.
971022			BPED	19981006MI	BUHL	ID	SO ID CORP OF SEVENTH-DAY ADVENTISTS
971022			BPED	19981006MJ	KUNA	ID	CSN INTERNATIONAL
971022	10/06/98	A	BPED	19971027MC	KUNA	ID	EDUCATIONAL MEDIA FOUNDATION
971029			BPED	19990506MC	SELMER	TN	BROADCASTING FOR THE CHALLENGED, INC
971029	05/10/99		BPED	19971027MA	SELMER	TN	AMERICAN FAMILY ASSOCIATION
9710X3	03/20/98	A	BPED	19971020MA	GREAT FALLS	MT	AMERICN FAMILY ASSOCIATION
9710X3		B	BPED	19980318ME	GREAT FALLS	MT	BROADCASTING FOR THE CHALLENGED, INC.
9710X3		B	BPED	19980320MG	GREAT FALLS	MT	PENSACOLA CHRISTIAN COLLEGE INC
9710X3		B	BPED	19980320MO	GREAT FALLS	MT	FAMILY STATIONS INC
971109	04/20/98	A	BPED	19971121MA	LOWELL	IN	AMERICAN FAMILY ASSOCIATION
971109		B	BPED	19980127MB	LYNWOOD	IL	CHRISTIAN ED ASSOCIATION

971109		B	BPED	19980415MA	LOWELL	IN	BROADCASTING FOR THE CHALLENGED, INC.
971109		B	BPED	19980417ME	LOWELL	IN	CSN INTERNATIONAL
971110			BPED	19980420IA	WOOSTER	OH	KENT STATE UNIVERSITY
971110	04/20/98	A	BPED	19971117MS	NEWARK	OH	RIVERSIDE MINISTRIES
971111	05/12/98	A	BPED	19971107ML	EDGEWATER	FL	MIMS COMMUNITY RADIO, INC.
971111		B	BPED	19980512MK	DELTONA	FL	HISPANIC BROADCAST SYSTEM, INC.
971112		B	BPED	19971125ID	FORT WORTH	TX	TEXAS CHRISTIAN UNIVERSITY
971112		B	BPED	19980512MD	MINERAL WELLS	TX	TEXAS CHRISTIAN UNIVERISTY
971112	05/12/98	A	BPED	19971117MJ	WEATHERFORD	TX	CSSI NON-PROFIT ED BROADCASTING CORP
971113	05/12/98	A	BPED	19971103MD	FREELAND	MI	AMERICAN FAMILY ASSOCIATION
971113		B	BPED	19980512MT	FREELAND	MI	CSN INTERNATIONAL
971114	05/12/98	A	BPED	19971112MA	VALPARAISO	IN	AMERICAN FAMILY ASSOCIATION
971114		B	BPED	19980512MU	CHESTERTON	IN	BROADCASTING FOR THE CHALLENGED INC
971114		B	BPED	19980512MV	SOUTH HAVEN	IN	THE WBEZ ALLIANCE INC
971114		B	BPED	19980512MP	VALPARAISO	IN	CSN INTERNATIONAL
971115			BPED	19980512MR	BUNKIE	LA	BROADCASTING FOR THE CHALLENGED INC
971115	05/12/98	A	BPED	19971112MK	BUNKIE	LA	AMERICAN FAMILY ASSOCIATION
971116	05/12/98	A	BPED	19971121MB	NORWALK	OH	CLEVELAND PUBLIC RADIO, INC.
971116		B	BPED	19980512MW	NORWALK	OH	KENT STATE UNIVERSITY
971117	05/12/98	A	BPED	19971117MD	ELWOOD	KS	AMERICAN FAMILY ASSOCIATION
971117		B	BPED	19971201MA	COUNTRY CLUB	MO	COMMUNITY BROADCASTING INC

971118	07/07/98	A	BPED	19971105MA	ARANSAS PASS	TX	PAULINO BERNAL EVAGELISM
971118		B	BPED	19980701MB	ARANSAS PASS	TX	BROADCASTING FOR THE CHALLENGED, INC
971118		B	BPED	19980707ME	ALICE	TX	FAMILY STATIONS INC
971119			BPED	19981006MF	MOSS BEACH	CA	CALIFORNIA HARDIVES INC.
971119	10/06/98	A	BPED	19971113MB	PESCADERO	CA	PESCADERO PUBLIC RADIO SERVICES INC
971147			BPED	19980727ME	WINCHESTER	IL	WINCHESTER PUBLIC RADIO INC
971147	07/29/98	A	BPED	19971211MB	WHITE HALL	IL	CORNERSTONE COMMUNITY RADIO INC
971209			BPED	19980512MC	RIVERSIDE	MI	SUPERIOR COMMUNICATIONS
971209			BPED	19980512MJ	MICHIGAN CITY	IN	BROADCASTING FOR THE CHALLENGED, INC
971209	05/12/98	A	BPED	19971216MA	MICHIGAN CITY	IN	AMERICAN FAMILY ASSOCIATION
971211	06/19/98	A	BPED	19971203MA	WEST POINT	CA	WAY-FM MEDIA GROUP INC
971211		B	BPED	19980619MB	LIVINGSTON	CA	YOUR CHRISTIAN COMPANION NETWORK, INC.
971211		B	BPED	19980619MD	EAST SONORA	CA	EDUCATIONAL MEDIA FOUNDATION
971211		B	BPED	19980619MJ	SAN ANDREAS	CA	CALIFORNIA ST UN, SACRAMENTO
971211		B	BPED	19980619MM	DORRINGTON	CA	STOCKTON CHRISTIAN LIFE COLLEGE
971212	05/29/98	A	BPED	19971208MA	SHERIDAN	WY	AMERICAN FAMILY ASSOCIATION
971212		B	BPED	19980206MB	SHERIDAN	WY	MONTANA STATE UNIVERSITY-BILLINGS
971212		B	BPED	19980529MB	SHERIDAN	WY	CSN INTERNATIONAL
971213	05/29/98	A	BPED	19971205MA	LOGAN	UT	LISTNERS COMMUNITY RADIO OF UTAH INC
971213		B	BPED	19980529ME	LOGAN	UT	BROADCASTING FOR THE CHALLENGED INC
971215			BPED	19980824MA	LARAMIE	WY	BROADCASTING FOR THE CHALLENGED INC

971215			BPED	19980825MB	CHUGWATER	WY	COLORADO CHRISTIAN UNIVERSITY
971215			BPED	19980825MC	CENTENNIAL	WY	ED COMMUNICATIONS OF COLORADO SPRING
971215			BPED	19980825MG	LARAMIE	WY	LARAMINE UNION BROADCASTING INC
971215	08/26/98	A	BPED	19971208MD	LARAMIE	WY	WESTERN INSPIRATIONAL BROADCASTERS I
971216			BPED	19980313IB	MONROE	CT	MONROE BOARD OF EDUCATION
971216			BPED	19980825MA	MONTGOMERY	NY	MONTGOMERY NYC BROADCASTING INC
971216			BPED	19980826MJ	MIDDLETOWN	NY	PENSACOLA CHRISTIAN COLLEGE, INC.
971216	08/26/98	A	BPED	19971230MB	MONTGOMERY	NY	RIVER BROADCASTING INC
971218		B	BPED	19980813MF	STERLING	CO	EDUC. COMMUN. OF COLORADO SPRINGS, I
971218		B	BPED	19980814MI	STERLING	CO	BROADCASTING FOR THE CHALLENGED INC
971218	08/14/98	A	BPED	19971222MB	STERLING	CO	COLORADO CHRISTIAN UNIVERSITY
980102	06/19/98	A	BPED	19980123ME	CUERO	TX	PAULINO BERNAL EVANGELISM
980102	01/29/01		BPED	19980513MC	CUERO	TX	GOOD NEWS BROADCASTING OF TEXAS
980103			BPED	19980619MF	SOUTH CHARLESTON	WV	BROADCASTING FOR THE CHALLENGED INC.
980103	06/19/98	A	BPED	19980113MB	SOUTH CHARLESTON	WV	AMERICAN FAMILY ASSOCIATION
980104			BPED	19980618MF	CASPER	WY	CASPER LEARNING FM INC
980104			BPED	19980619MG	CASPER	WY	BROADCASTING FOR THE CHALLENGED, INC
980104	06/19/98	A	BPED	19980112MB	CASPER	WY	AMERICAN FAMILY ASSOCIATION
980105			BPED	19980706MB	OLATHE	CO	COLORADO CHRISTIAN UNIVERSITY
980105			BPED	19980707MD	COLONA	CO	CSN INTERNATIONAL
980105	07/07/98	A	BPED	19980107MB	COLONA	CO	ED COMMUNIC. OF COLORADO SPRINGS, INC.
980106	07/07/98	A	BPED	19980113MA	STEPHENVILLE	TX	FRONTLINE INTERNATIONAL, INC.

980106		B	BPED	19980122MD	STEPHENVILLE	TX	CSSI NONPROFIT EDUC. BROADCASTING CORP.
980107			BPED	19980602MA	SPRINGFIELD	OH	THE BOARD OF DIRECTORS OF WITTENBERG
980107			BPED	19980707MC	DELAWARE	OH	LIFE RADIO MINISTRIES
980107	07/07/98	A	BPED	19980105MA	URBANA	OH	AMERICAN FAMILY ASSOCIATION
980108			BPED	19980710ME	YOAKUM	TX	HOUSTON CHRISTIAN BROADCASTERS INC
980108			BPED	19980724MD	GONZALES	TX	MARANATHA CHURCH OF LAREDO INC.
980108			BPED	19980729MA	GONZALES	TX	SPIRIT OF AMERICA ASSOCIATION
980108			BPED	19980729MJ	BAY CITY	TX	FAMILY STATION, INC.
980108	07/29/98	A	BPED	19980123MD	GONZALES	TX	PAULINO BERNAL EVANGELISM
980109	07/29/98	A	BPED	19980108MN	PRINCETON	WV	AMERICAN FAMILY ASSOCIATION
980109		B	BPED	19980729MC	CRAB ORCHARD	WV	POSITIVE ALTERNATIVE RADIO INC
980110			BPED	19980424MA	BRECKENRIDGE	TX	AMERICAN FAMILY ASSOCIATION
980110			BPED	19980729ME	BRECKENRIDGE	TX	BROADCASTING FOR THE CHALLENGED, INC.
980110			BPED	19980729MF	EASTLAND	TX	BROADCASTING FOR THE CHALLENGED INC.
980110	07/29/98	A	BPED	19980122MB	EASTLAND	TX	CSSI NON-PROFIT ED BROADCASTING CORP
980111			BPED	19980602MC	NEW ULM	MN	MINN-IOWA CHRISTIAN B/G FOUNDATION
980111			BPED	19980729MG	NEW ULM	MN	BROADCASTING FOR THE CHALLENGED, INC.
980111	07/29/98	A	BPED	19980105MD	NEW ULM	MN	AMERICAN FAMILY ASSOCIATION
980114	01/29/01		BPED	19980724ME	CEDAR CREEK	FL	CEDAR CREEK PUBLIC RADIO, INC.
980114			BPED	19980727MF	BUSHNELL	FL	WEST COAST EDUCATIONAL, INC.
980114			BPED	19980728MB	BUSHNELL	FL	FLORIDA PUBLIC RADIO, INC.
980114			BPED	19980610MD	WEBSTER	FL	WEBSTER CHRISTIAN EDUCATIONAL ASSN

980115			BPED	19980729MD	PAHALA	HI	BROADCASTING FOR THE CHALLENGED, INC.
980115	07/29/98	A	BPED	19980121ME	PAHALA	HI	KAU HIGH SCHOOL
980116			BPED	19980824ME	ROSWELL	NM	BROADCASTING FOR THE CHALLENGED INC
980116			BPED	19980826MG	SOCORRO	NM	FAMILY STATIONS, INC.
980116	08/26/98	A	BMPED	19980123MG	ALAMOGORDO	NM	SOUTHERN NEW MEXICO RADIO FOUNDATION
980117	08/26/98	A	BPED	19980126MD	BILLINGS	MT	WESTERN INSPIRATIONAL BRD/CATERS INC
980117		B	BPED	19971113ME	BILLINGS	MT	AMERICAN FAMILY ASSOCIATION
980117		B	BPED	19980824MC	BILLINGS	MT	BROADCASTING FOR THE CHALLENGED INC
980117		B	BPED	19980824MD	BILLINGS	MT	BROADCASTING FOR THE CHALLENGED INC
980117		B	BPED	19980824MG	BILLINGS	MT	BROADCASTING FOR THE CHALLENGED INC
980117		B	BPED	19980825MF	PARK CITY	MT	COLORADO CHRISTIAN UNIVERSITY
980118			BPED	19980529MF	TELLURIDE	CO	BROADCASTING FOR THE CHALLENGED INC
980118	05/29/98	A	BPED	19980107MF	PLACERVILLE	CO	EDUCATIONAL COMM. OF COLORADO SPRING
980119		B	BPED	19980212MA	STEPHENVILLE	TX	AMERICAN FAMILY ASSOCIATION
980119			BPED	19980730ME	STEPHENVILLE	TX	THE NORTH TEXAS MUSIC FOUNDATION, IN
980119			BPED	19980901MH	STEPHENVILLE	TX	FT. WORTH STEPHENVILLE FM INC
980119			BPED	19980909MD	SELDEN	TX	FRONTLINE INTERNATIONAL INC.
980119	09/09/98	A	BPED	19980122MC	BLUFF DALE	TX	CSSI NON PROFIT ED BROADCASTING CORP
980120			BPED	19980313IB	EDEN	OH	SHOFAR BROADCASTING CORP
980120			BPED	19980716MR	EDEN	OH	MARANATHA BROADCASTING INC.
980120			BPED	19980901MD	GROVE CITY	OH	AMERICAN FAMILY ASSOCIATION
980120	09/09/98	A	BPED	19980113MD	WAVERLY	OH	LIFE RADIO MINISTRIES INC
980121	09/09/98	A	BPED	19980115MB	BAY CITY	TX	AMERICAN FAMILY ASSOCIATION

980121		B	BPED	19980901MF	BAY CITY	TX	HOUSTON BAY CITY INC
980122			BPED	19980814MJ	BRUSH	CO	BROADCASTING FOR THE CHALLENGED INC
980122	08/14/98	A	BPED	19980115MA	BRUSH	CO	ED COMMUNICATIONS OF CO SPGS INC
980125			BPED	19980702MA	MIDLAND	TX	PENSACOLA CHRISTIAN COLLEGE, INC.
980125			BPED	19981001MB	MIDLAND	TX	MIDLAND STEREO REY INC.
980125			BPED	19981006MM	MIDLAND	TX	BROADCASTING FOR THE CHALLENGED, INC.
980125	10/06/98	A	BPED	19980120MH	MIDLAND	TX	AMERICAN FAMILY ASSOCIATION
980127	07/29/98	A	BPED	19980105MC	ROCHESTER	IN	AMERICAN FAMILY ASSOCIATION
980127		B	BPED	19980727MA	ROCHESTER	IN	ROCHESTER COMMUNITY RADIO INC
9801XX			BPED	19980922MA	PORT SULPHUR	LA	NEW ORLEANS Y2K INC
9801XX	09/23/98	A	BPED	19980120MG	PORT SULPHUR	LA	AMERICAN FAMILY ASSOCIATION
980201			BPED	19980729MK	ROSEBURG	OR	FAMILY STATIONS, INC.
980201	07/29/98	A	BPED	19980205MA	ROSEBURG	OR	LANE COMMUNITY COLLEGE
980202	05/29/98	A	BPED	19980204ME	POPLAR BLUFF	MO	BD OF REGENTS, SE MO ST UNIVERSITY
980202		B	BPED	19980528MA	POPLAR BLUFF	MO	POPLAR BLUFF EDUCATIONAL INC
980202		B	BPED	19980528MC	POPLAR BLUFF	MO	BIBLE BROADCASTING NETWORK INC
980202		B	BPED	19980528MI	KENNETT	MO	AMERICAN FAMILY ASSOCIATION
980202		B	BPED	19980529MI	POPLAR BLUFF	MO	BROADCASTING FOR THE CHALLENGED, INC.
980204	05/29/98	A	BPED	19980204MC	CAVE JUNCTION	OR	THE ST BD HGHR ED/SO OR UNIVERSITY
980204		B	BPED	19980123MM	SELMA	OR	EDUCATIONAL MEDIA FOUNDATION
980204		B	BPED	19980528MB	CAVE JUNCTION	OR	PENSACOLA CHRISTIAN COLLEGE INC.
980204		B	BPED	19980528MG	CAVE JUNCTION	OR	FAMILY STATIONS INC.

980205			BPED	19980901MG	COMFORT	TX	SAN ANTONIO COMFORT, INC
980205			BPED	19980908MC	DRIPPING SPRINGS	TX	AMERICAN B/CASTING EDUC. FOUNDATION
980205	09/09/98	A	BPED	19980213MA	FREDERICKSBURG	TX	HOUSTON CHRISTIAN BROADCASTERS INC
980206			BPED	19980218MD	BEND	OR	CSN INTERNATIONAL
980206			BPED	19980626MA	BEND	OR	AMERICAN FAMILY ASSOCIATION
980206			BPED	19980826MI	LEBANON	OR	EDUCATIONAL MEDIA FOUNDATION
980206	08/26/98	A	BPED	19980126MB	BEND	OR	LANE COMMUNITY COLLEGE
980207			BPED	19981005MD	SAN ANGELO	TX	BROADCASTING FOR THE CHALLENGED, INC.
980207	10/06/98	A	BPED	19980226MA	SAN ANGELO	TX	ANGELO CHRISTIAN MINISTRIES INC
980208			BPED	19980810MB	AUGUSTA	MI	AMERICAN FAMILY ASSOCIATION
980208			BPED	19980814MA	SPRINGFIELD	MI	CORNERSTONE BAPTIST EDUCATIONAL
980208			BPED	19980814MD	BELDING	MI	SUPERIOR COMMUNICATIONS
980208			BPED	19980814MG	AUGUSTA	MI	BROADCASTING FOR THE CHALLENGED INC.
980208	08/14/98	A	BPED	19980218MB	AUGUSTA	MI	PENSACOLA CHRISTIAN COLLEGE INC
980209		B	BPED	19980622MB	EUREKA SPRINGS	AR	NEW LIFE EVANGELISTIC CENTER, INC.
980209		B	BPED	19990311MD	ANDERSON	MO	CSN INTERNATIONAL
980209		B	BPED	19990311MJ	BARTLESVILLE	OK	EDUCATIONAL MEDIA FOUNDATION
980209	03/11/99	A	BPED	19980225ME	GROVE	OK	GROVE BROADCASTING INC.
980210			BPED	19980909MO	TEXARKANA	AR	BROADCASTING FOR THE CHALLENGED INC
980210	09/09/98	A	BPED	19980204MD	TEXARKANA	AR	PAULINO BERNAL EVANGELISM
980211	11/10/98	A	BPED	19980220MF	LAKE CITY	MI	GREAT LAKES COMMUNITY B/CASTING, INC
980211		B	BPED	19981110MP	LAKE CITY	MI	SUPERIOR COMMUNICATIONS

980211		B	BPED	19981110MQ	LAKE CITY	MI	NASSAWADOX FM INC.
98022S			BPED	19980923MI	DANNEMORA	NY	AMERICAN EDUCATIONAL BROADCAST/G, IN
98022S	09/23/98	A	BPED	19980202MA	MALONE	NY	MARS HILL BROADCASTING CO INC
9802XC			BPED	19980922MC	COLUSA	CA	SACRAMENTO BRAIN TRUST INC
9802XC			BPED	19980922MD	SUTTER	CA	CALIFORNIA STATE UN SACRAMENTO
9802XC			BPED	19980923ME	LIVE OAK	CA	FAMILY STATIONS, INC.
9802XC			BPED	19980923MJ	WILLIAMS	CA	EDUCATIONAL MEDIA FOUNDATION
9802XC			BPED	19980923MK	SUTTER	CA	BROADCASTING FOR THE CHALLENGED, INC
9802XC	09/23/98	A	BPED	19980218MC	SUTTER	CA	CSN INTERNATIONAL
980301			BPED	19980826MH	ADAMS	WI	STATE OF WISC. EDUCATION COMM. BOARD
980301	08/26/98	A	BPED	19980309MC	RICHLAND CENTER	WI	RICHLAND CENTER FELLOWSHIP
980302	08/26/98	A	BPED	19980331MB	MAPPSVILLE	VA	MIRACLE TEMPLE OF FAITH MINISTRIES
980302		B	BPED	19980824MF	MAPPSVILLE	VA	BROADCASTING FOR THE CHALLENGED INC
980302		B	BPED	19980825MH	NASSAWADOX	VA	NASSAWADOX FM INC
980303	08/26/98	A	BPED	19980318MG	CHASE CITY	VA	CENTRAL VA ED TELECOMMUNICATIONS COR
980303		B	BPED	19980826MB	CHASE CITY	VA	VISION COMMUNICATIONS INC
980304	08/26/98	A	BPED	19980324MA	SALEM	OR	WESTERN BAPTIST COLLEGE
980304		B	BPED	19980824MB	SALEM	OR	BROADCASTING FOR THE CHALLENGED INC
980304		B	BPED	19980826ML	SALEM	OR	CSN INTERNATIONAL
980305			BPED	19980909MA	KEY WEST	FL	PUBLIC RADIO INC
980305			BPED	19980909MN	STOCK ISLAND	FL	MARY V. HARRIS FOUNDATION
980305			BPED	19980909MT	KEY WEST	FL	BROADCASTING FOR THE CHALLENGED INC

980305	09/09/98	A	BPED	19980316MD	KEY WEST	FL	SOUTHERNMOST EDUCATIONAL INC
980306	09/09/98	A	BPED	19980305MC	HARPSWELL	ME	BIBLE BROADCASTING NETWORK INC
980306			BPED	19980909MX	CONWAY	NH	NH EDUCATIONAL RADIO FOUNDATION
980307	09/09/98	A	BPED	19980319MP	CASCADE	IA	COMMUNITY RADIO, INC
980307			BPED	19980908MA	DUBUQUE	IA	AMERICAN FAMILY ASSOCIATION
980307			BPED	19980909ML	PLATTEVILLE	WI	EDUCATIONAL COMMUNICATIONS BOARD
980307			BPED	19980909MU	DUBUQUE	IA	BROADCASTING FOR THE CHALLENGED INC
980309			BPED	19980619ME	LINCOLNTON	GA	AUGUSTA RADIO FELLOWSHIP INST. INC.
980309			BPED	19981023MF	THOMSON	GA	BROADCASTING FOR THE CHALLENGED, INC
980309	10/23/98	A	BPED	19980319MI	THOMSON	GA	AMERICAN FAMILY ASSOCIATION
980315			BPED	19981230MB	NEWTON	IA	BROADCASTING FOR THE CHALLENGED, INC.
980315			BPED	19990104MI	ADEL	IA	CSN INTERNATIONAL
980315			BPED	19990104ML	FORT DODGE	IA	FAMILY STATIONS, INC.
980315	01/04/99	A	BPED	19980319MQ	MITCHELLVILLE	IA	UNIVERSITY OF NORTHERN IOWA
98033P			BPED	19980812MJ	HICKORY	NC	HICKORY EDUCATIONAL INC
98033P			BPED	19980814MQ	HICKORY	NC	RADIO TRAINING NETWORK, INC.
98033P	08/14/98	A	BPED	19980316MB	HICKORY	NC	AMERICAN FAMILY ASSOCIATION
9803HL			BPED	19980923MG	COOS BAY	OR	FAMILY STATIONS, INC.
9803HL	06/02/99	A	BPED	19980810MC	COOS BAY	OR	COOS BAY SCHOOL DISTRICT 9
9803X3			BPED	19980923MA	KUTZTOWN	PA	BERKS RADIO ASSOCIATION
9803X3			BPED	19980923MF	WYOMISSING	PA	FOUR RIVERS COMMUNITY B/G CORP
9803X3	09/23/98	A	BPED	19980213ME	SHENANDOAH	PA	AMERICAN FAMILY ASSOCIATION

980401			BPED	19980421MC	LARAMIE	WY	COLORADO CHRISTIAN UNIVERSITY
980401			BPED	19980824MH	LARAMIE	WY	BROADCASTING FOR THE CHALLENGED INC
980401			BPED	19980825MD	LARAMIE	WY	ED COMMUN. OF COLORADO SPRINGS, INC.
980401			BPED	19980825ME	LARAMIE	WY	COLORADO CHRISTIAN UNIVERSITY
980401			BPED	19980826MK	LARAMIE	WY	UNIVERSITY OF WYOMING
980401	08/26/98	A	BPED	19980407MD	LARAMIE	WY	AMERICAN FAMILY ASSOCIATION
980402			BPED	19980901MI	EARLHAM	IA	DES MOINES EARLHAM INC
980402			BPED	19980909MC	CRESTON	IA	FLORIDA PUBLIC RADIO INC
980402	09/09/98	A	BPED	19980408MB	CRESTON	IA	AMERICAN FAMILY ASSOCIATION
980404			BPED	19980909MM	BENTON HARBOR	MI	PENSACOLA CHRISTIAN COLLEGE INC
980404			BPED	19980909MQ	BENTON HARBOR	MI	CORNERSTONE BAPTIST ED MINISTRIES INC
980404	09/09/98	A	BPED	19980401MA	BENTON HARBOR	MI	AMERICAN FAMILY ASSOCIATION
980405			BPED	19980908MB	SANTA MARIA	CA	BELCHER SANTA MARIA B/CASTING CORP.
980405			BPED	19980909MV	LOMPOC	CA	BROADCASTING FOR THE CHALLENGED INC
980405	09/09/98	A	BPED	19980414MD	LOMPOC	CA	CALVARY CHAPEL OF LOMPOC
980406	09/09/98	A	BPED	19980406MB	EMPORIA	KS	UNIVERSITY OF KANSAS
980406		B	BPED	19980601MB	EMPORIA	KS	BIBLE BROADCASTING NETWORK INC
980407			BPED	19981005MF	STANTON	TX	POPLAR BLUFF EDUCATIONAL INC.
980407			BPED	19981006ME	BIG SPRING	TX	BROADCASTING FOR THE CHALLENGED INC.
980407	10/06/98	A	BPED	19980417MG	BIG SPRING	TX	PAULINO BERNAL EVANGELISM
980409	10/06/98	A	BPED	19980420MH	PRINCETON	IL	ILLINOIS BIBLE INSTITUTE INC
980409		B	BPED	19981006MN	SPRING VALLEY	IL	SPIRIT EDUCATION ASSOCIATION, INC.

980409		B	BPED	19980428IE	PEKIN	IL	CENTRAL ILLINOIS RADIO FELLOWSHIP, INC.
980410			BPED	19981006MA	GLOBE	AZ	CSN INTERNATIONAL
980410			BPED	19981006ML	GLOBE	AZ	FAMILY STATIONS, INC.
980410	10/06/98	A	BPED	19980408MC	GLOBE	AZ	LIFE TEEN INC.
980411			BPED	19980603MA	BELLEFONTE	PA	SOUTHPOINT EDUCATIONAL RADIO INC
980411			BPED	19981022MC	STATE COLLEGE	PA	INVISIBLE ALLIES MINISTRIES
980411			BPED	19981023MB	HALIFAX	PA	BROADCASTING FOR THE CHALLENGED, INC
980411			BPED	19981023MG	STATE COLLEGE	PA	FAMILY STATIONS, INC.
980411	10/23/98	A	BPED	19980415MD	MIFFLIN	PA	JUNIATA COMMUNITY AWARENESS ASSN
980412			BPED	19981016MB	PLYMOUTH	IN	ROCHERSTER COMMUNITY RADIO INC.
980412			BPED	19981023MM	LOGANSPOUR	IN	CSN INTERNATIONAL
980412	10/23/98	A	BPED	19980414MB	PLYMOUTH	IN	AMERICAN FAMILY ASSOCIATION
980413			BPED	19981022MA	RIGBY	ID	EDUCATIONAL MEDIA FOUNDATION
980413			BPED	19981023MA	POCATELLO	ID	BROADCASTING FOR THE CHALLENGED, INC
980413			BPED	19981023ME	POCATELLO	ID	EDUCATIONAL MEDIA FOUNDATION
980413			BPED	19981023MJ	POCATELLO	ID	YOUR CHRISTIAN COMPANION NETWORK, INC.
980413			BPED	19981023ML	POCATELLO	ID	IDAHO STATE UNIVERSITY
980413	10/23/98	A	BPED	19980410MB	POCATELLO	ID	CSN INTERNATIONAL
980414	11/10/98	A	BPED	19980421MA	BEEKMAN	NY	MONROE BOARD OF EDUCATION
980414		B	BPED	19981110MA	BEEKMAN	NY	MONTGOMERY NYC BROADCASTING INC.
980415	12/03/98	A	BPED	19980427MQ	FARGO	ND	PIONEER PUBLIC BROADCASTING COMPANY
980415		B	BPED	19981201MA	HORACE	ND	SELAH CORPORATION
980415		B	BPED	19981202MG	GLYNDON	MN	MARY V. HARRIS FOUNDATION

980415		B	BPED	19981203MC	FARGO	ND	BROADCASTING FOR THE CHALLENGED, INC.
98043S			BPED	19980922MF	LEXINGTON	KY	UNIVERSITY OF KENTUCKY
98043S			BPED	19980923MH	FRANKFORT	KY	BROADCASTING FOR THE CHALLENGED, INC.
98043S	09/23/98	A	BPED	19980409MA	FRANKFORT	KY	AMERICAN FAMILY ASSOCIATION
9804X2			BPED	19980515MO	COLLEGE STATION	TX	BRAZOS EDUCATIONAL RADIO
9804X2			BPED	19980909MP	BRYAN	TX	HOUSTON CHRISTIAN BROADCASTERS INC
9804X2			BPED	19980922MB	CALDWELL	TX	PHILOS BROADCAST INC
9804X2	09/23/98	A	BPED	19980410MA	BRYAN	TX	BRAZOS VALLEY COUNCIL ON ALCOHOL
980501			BPED	19981006MO	BUSHLAND	TX	BROADCASTING FOR THE CHALLENGED, INC
980501			BPED	19980629MA	BUSHLAND	TX	CSN INTERNATIONAL
980501	10/06/98	A	BPED	19980501MA	BUSHLAND	TX	KANZA SOCIETY INC.
980502			BPED	19980527MA	BROKENBURG	VA	EDUCATIONAL OPPORTUNITIES INC.
980502			BPED	19981023MC	SPOTSYLVANIA	VA	BROADCASTING FOR THE CHALLENGED, INC
980502			BPED	19981023MP	FREDERICKSBURG	VA	CENTRAL VA. EDUC. TELECOM. CORP.
980502	10/23/98	A	BPED	19980513MA	SPOTSYLVANIA	VA	EDUCATIONAL MEDIA CORPORATION
980503			BPED	19981023MK	ALTOONA	PA	BROADCASTING FOR THE CHALLENGED, INC
980503			BPED	19981023MD	BEDFORD	PA	FAMILY STATIONS, INC.
980503	10/23/98	A	BPED	19980511MA	PATTON	PA	SOUTHPOINT EDUCATIONAL RADIO, INC
980504			BPED	19981023MN	MORGANTOWN	IN	CSN INTERNATIONAL
980504	10/23/98	A	BPED	19980511ME	COLUMBUS	IN	GOOD SHEPHERD RADIO, INC.
980506			BPED	19980505MC	ROGERS HEIGHTS	MI	GREAT LAKES COMMUNITY BROADCASTING INC.
980506			BMPED	19980909ME	WHITE STAR	MI	SUPERIOR COMMUNICATIONS

980506			BPED	19981231MF	CASS CITY	MI	BROADCASTING FOR THE CHALLENGED, INC
980506			BPED	19990104MO	ELKTON	MI	CSN INTERNATIONAL
980506	01/04/99	A	BPED	19980505MD	GAGETOWN	MI	PLONTA BROADCASTING INC.
980507	11/10/98	A	BPED	19980514MA	NANTY GLO	PA	EDUCATIONAL OPPORTUNITIES, INC.
980507			BPED	19981109MA	WESTMONT	PA	DUQUESNE UNIVERSITY OF THE HOLY GHOST
980508			BPED	19981110MD	PIERRE	SD	BROADCASTING FOR THE CHALLENGED, INC
980508			BPED	19981110MF	PIERRE	SD	BROADCASTING FOR THE CHALLENGED, INC
980508	11/10/98	A	BPED	19980529MD	PIERRE	SD	VCY AMERICA INC
980509			BPED	19981110MH	KEY WEST	FL	BROADCASTING FOR THE CHALLENGED, INC
980509	11/10/98	A	BPED	19980526MC	KEY WEST	FL	STAR RADIO INCORPORATED
980510			BPED	19981110MB	CAPE CANAVERAL	FL	WEST COAST EDUCATIONAL, INC
980510			BPED	19981110MI	CAPE CANAVERAL	FL	BROADCASTING FOR THE CHALLENGED, INC
980510			BPED	19981110MJ	CAPE CANAVERAL	FL	PUBLIC RADIO, INC.
980510			BPED	19981110MK	CAPE CANAVERAL	FL	FLORIDA PUBLIC RADIO, INC.
980510	11/10/98	A	BPED	19980519MD	CAPE CANAVERAL	FL	CSN INTERNATIONAL
980511			BPED	19981110IA	FRESNO	CA	FAMILY STATIONS, INC.
980511	11/10/98	A	BPED	19980519MC	FIREBAUGH	CA	CSN INTERNATIONAL
980511		B	BPED	19980818MD	HOLLISTER	CA	CENTRAL COAST EDUCATIONAL BROADCASTERS
980511		B	BPED	19981110MC	MENDOTA	CA	CALIFORNIA HARDRIVES, INC
980511		B	BPED	19981110ML	TRACY	CA	EDUCATIONAL MEDIA FOUNDATION
980511		B	BPED	19981110MM	FIREBAUGH	CA	YOUR CHRISTIAN COMPANION NETWORK, INC.
980512			BPED	19981203MA	MICHIGAMME	MI	NORTHLAND COMMUNITY BROADCASTERS
980512			BPED	19981203MI	IRONWOOD	MI	BROADCASTING FOR THE CHALLENGED, INC

980512	12/03/98	A	BPED	19980521MG	IRONWOOD	MI	VCY AMERICA, INC.
980513			BPED	19990209MA	COLUMBUS	MS	PENSACOLA CHRISTIAN COLLEGE, INC.
980513			BPED	19990318MJ	COLUMBUS	MS	BROADCASTING FOR THE CHALLENGED, INC
980513	03/19/99	A	BPED	19980526MB	COLUMBUS	MS	AMERICAN FAMILY ASSOCIATION
980514			BPED	19990318MF	BUTTE	MT	HI-LINE RADIO FELLOWSHIP, INC.
980514			BPED	19990506MA	BUTTE	MT	BROADCASTING FOR THE CHALLENGED, INC
980514	05/10/99	A	BPED	19980506MC	BUTTE	MT	AMERICAN FAMILY ASSOCIATION
980515			BPED	19990719MG	COVENTRY	RI	BROADCASTING FOR THE CHALLENGED, INC
980515			BPED	19990719MH	EAST GREENWICH	RI	THE EDUC. RADIO/PUBLIC OF NEW MILLEN
980515	07/19/99	A	BPED	19980519MZ	COVENTRY	RI	SOUTHERN RHODE ISLAND PUB. RAD. B/C
980601			BPED	19981016MA	CARBONDALE	PA	MONTGOMERY NYC BROADCASTING, INC.
980601			BPED	19981023MH	CARBONDALE	PA	FAMILY LIFE MINISTRIES, INC.
980601			BPED	19981023MI	CARBONDALE	PA	BROADCASTING FOR THE CHALLENGED, INC.
980601			BPED	19981023MQ	HONESDALE	PA	FOUR RIVERS COMMUNITY B/C CORP
980601	10/23/98	A	BPED	19980623MD	CARBONDALE	PA	SOUND OF LIFE INC
980603	01/04/99	A	BPED	19980629MC	INDEPENDENCE	KS	CATHEDRAL OF PRAISE INC
980603		B	BMPED	19981015MD	INDEPENDENCE	KS	AMERICAN FAMILY ASSOCIATION
980604			BPED	19981202MF	ANDALUSIA	AL	MONTGOMERY CHRISTIAN EDUC. RADIO, INC
980604			BPED	19981203MG	UNION SPRINGS	AL	PENSACOLA CHRISTIAN COLLEGE, INC.
980604	12/03/98	A	BMPED	19980619MA	TROY	AL	AMERICAN FAMILY ASSOCIATION
980605			BPED	19981215MA	OSKALOOSA	IA	IA STATE UN OF SCIENCE & TECHNOLOGY
980605			BPED	19981215MC	OSKALOOSA	IA	FAMILY STATIONS, INC.

980605	12/15/98	A	BPED	19980630MC	OSKALOOSA	IA	SALT & LIGHT COMMUNICATIONS INC
980606			BPED	19981211MB	ROCHESTER	MN	ROCHESTER COMMUNITY & TECHNICAL COL
980606			BPED	19981215MD	HAYFIELD	MN	LIFETALK BROADCASTING ASSOCIATION
980606			BPED	19981215ME	ALBERT LEA	MN	CSN INTERNATIONAL
980606			BPED	19981215MG	ALBERT LEA	MN	BROADCASTING FOR THE CHALLENGED INC.
980606	12/15/98	A	BPED	19980603MB	AUSTIN	MN	MINNESOTA PUBLIC RADIO
980608			BPED	19981202MC	STEAMBOAT SPRINGS	CO	ASPEN PUBLIC RADIO INC.
980608			BPED	19981215MF	HAYDEN	CO	BROADCASTING FOR THE CHALLENGED, INC
980608			BPED	19981215MH	STEAMBOAT SPRINGS	CO	COLORADO CHRISTIAN UNIVERSITY
980608			BPED	19981215MJ	CRAIG	CO	COLORADO CHRISTIAN UNIVERSITY
980608	12/15/98	A	BPED	19980610MA	HAYDEN	CO	ED'L COMMUNICATIONS OF CO SPRINGS INC
980609			BPED	19981202MB	LA GRANGE	GA	N C PUBLIC BROADCAST INCORPORATED
980609			BPED	19981203MH	LA GRANGE	GA	BROADCASTING FOR THE CHALLENGED, INC
980609			BPED	19981203MJ	LA GRANGE	GA	FAMILY STATIONS, INC.
980609	12/03/98	A	BPED	19980604MA	LA GRANGE	GA	COMMUNITY PUBLIC RADIO, INC.
980610			BPED	19981202MD	JUNIATA	NE	ASPEN PUBLIC RADIO, INC.
980610			BPED	19981203MD	GRAND ISLAND	NE	BROADCASTING FOR THE CHALLENGED INC
980610			BPED	19981203MK	GRAND ISLAND	NE	FAMILY STATIONS, INC.
980610	12/03/98	A	BPED	19980609MA	HASTINGS	NE	AMERICAN FAMILY ASSOCIATION
980610		A	BPED	19980721MB	GRAND ISLAND	NE	EDUCATIONAL OPPORTUNITIES INC.
980611			BPED	19981203ME	DANVILLE	IL	BROADCASTING FOR THE CHALLENGED INC.
980611	12/03/98	A	BPED	19980602MB	VEEDERSBURG	IN	GOOD SHEPHERD RADIO INC.
980613			BPED	19981231ME	WAVERLY	IA	BROADCASTING FOR THE CHALLENGED, INC

980613	01/04/99	A	BPED	19980612MB	WAVERLY	IA	WARTBURG COLLEGE
980614	01/04/99	A	BPED	19980629MB	MARSHALLTOWN	IA	CSN INTERNATIONAL
980614		B	BPED	19981230MF	MARSHALLTOWN	IA	AMERICAN FAMILY ASSOCIATION
980614		B	BPED	19981231MC	STATE CENTER	IA	MARSHALLTOWN EDUCATION PLUS, INC.
980614		B	BPED	19990104MC	DES MOINES	IA	FAMILY STATIONS, INC.
980615			BPED	19981231MI	JACKSON	WY	BROADCASTING FOR THE CHALLENGED, INC.
980615			BPED	19981231MK	JACKSON	WY	BROADCASTING FOR THE CHALLENGED, INC
980615	01/04/99	A	BPED	19980618MA	JACKSON	WY	SOUTHPOINT EDUCATIONAL RADIO INC.
980616	01/04/99	A	BPED	19980610MB	FAVORITA	FL	CHRISTIAN EDUCATIONAL ASSOCIATION
980616		B	BPED	19981230MA	FLAGLER BEACH	FL	BROADCASTING FOR THE CHALLENGED, INC.
980616		B	BPED	19981231MB	FAVORETTA	FL	DAYSTAR PUBLIC RADIO, INC.
980616		B	BPED	19990104MA	BEVERLY BEACH	FL	GOOD IDEA INC.
980616		B	BPED	19990104MB	FAVORETTA	FL	PATHWAY PUBLIC RADIO
980616		B	BPED	19990104MN	BEVERLY BEACH	FL	COMMUNITY PUBLIC RADIO, INC.
980616		B	BPED	19990104MP	PALM COAST	FL	CENTRAL FL ED FOUNDATION INC
980617	01/04/99	A	BPED	19980617MD	MERTZON	TX	SOLID ROCK BROADCASTING INC
980617			BPED	19981230MC	SAN ANGELO	TX	BROADCASTING FOR THE CHALLENGED, INC
980618			BPED	19980727MD	CHERRY VALLEY	AR	IMPACT MINISTRIES INTERNATIONAL INC
980618			BPED	19990114MG	MARKED TREE	AR	NEW ORLEANS Y2K INCORPORATED
980618			BPED	19990120ME	MARKED TREE	AR	BROADCASTING FOR THE CHALLENGED, INC
980618	01/20/99	A	BPED	19980611MC	MARKED TREE	AR	ESTHER EDUCATIONAL CORPORATION
980619			BPED	19990527MB	LARAMIE	WY	BROADCASTING FOR THE CHALLENGED, INC.
980619			BPED	19990601MG	LARAMIE	WY	EDUC. COMM. OF COLORADO SPRINGS, INC

980619			BPED	19990602ML	WEST LARAMIE	WY	CSN INTERNATIONAL
980619	06/02/99	A	BPED	19980625MB	LARAMIE	WY	SALT & LIGHT COMMUNICATIONS INC.
980622	05/03/00	A	BPED	19980618MC	DORSEY	IL	LIBERTY COMMUNICATIONS INC.
980622			BNPED	20000428AAI	DORSEY	IL	BROADCASTING FOR THE CHALLENGED, INC.
9806PP			BPED	19990319MC	SEALY	TX	HOUSTON CHRISTIAN BROADCASTERS, INC.
9806PP	03/19/99	A	BPED	19980610MC	SEALY	TX	CHRISTIAN EDUCATIONAL ASSOCIATION
980701	01/04/99	A	BPED	19980713MD	SPRING ARBOR	MI	SPRING ARBOR COLLEGE COMMUNICATIONS
980701		B	BPED	19981224MB	JACKSON	MI	GREAT LAKES COMMUNITY BROADCASTING
980702			BPED	19990104MJ	KELSO	WA	CSN INTERNATIONAL
980702			BPED	19990104MQ	RAINIER	OR	EDUCATIONAL MEDIA FOUNDATION
980702	01/04/99	A	BPED	19980706MA	TILLAMOOK	OR	TILlicum FOUNDATION
980703			BPED	19990104MD	NEWPORT	OR	FAMILY STATIONS INC.
980703			BPED	19990104MG	JUNCTION CITY	OR	CSN INTERNATIONAL
980703			BPED	19990104MU	DEPOE BAY	OR	LARAMIE UNION BROADCASTING, INC
980703	01/04/99	A	BPED	19980707MG	GLENEDEN BEACH	OR	OREGON PUBLIC BROADCASTING
980703		A	BPED	19980715ME	GLENEDEN BEACH	OR	KBPS PUBLIC RADIO FOUNDATION
980703		A	BPED	19980826MF	MONROE	OR	FAMILY STATIONS, INC.
980704			BPED	19990104MM	LAKE LOOTAWANA	MO	COMMUNITY BROADCASTING, INC
980704	01/04/99	A	BPED	19980717MA	LIBERTY	MO	WILLIAM JEWELL COLLEGE
980705			BPED	19990104MF	LAKE	MS	GREATER MISSISSIPPI BROADCASTING, INC
980705	01/04/99	A	BPED	19980714MD	FOREST	MS	SALT & LIGHT COMMUNICATIONS, INC.

980706			BPED	19981230MD	SAULT STE. MARIE	MI	BROADCASTING FOR THE CHALLENGED, INC
980706	01/04/99	A	BPED	19980707MH	SAULT STE. MARIE	MI	NORTHERN CHRISTIAN RADIO INC
980708			BPED	19990310MD	MONTAUK	NY	BROADCASTING FOR THE CHALLENGED INC
980708			BPED	19990310MJ	MONTAUK	NY	MONTGOMERY NYC BROADCASTING, INC
980708	03/11/99	A	BPED	19980713MF	MONTAUK	NY	WPKN, INC.
980709			BPED	19981013MA	COLUMBIA	MS	PENSACOLA CHRISTIAN COLLEGE, INC.
980709			BPED	19990311MH	HICKORY	MS	CSN INTERNATIONAL
980709			BPED	19990311MM	MERIDIAN	MS	FAMILY STATIONS, INC.
980709	03/11/99	A	BPED	19980713ME	LAUREL	MS	AMERICAN FAMILY ASSOCIATION
980710			BPED	19990310MR	TRAFALGAR	IN	BROADCASTING FOR THE CHALLENGED, INC
980710			BPED	19990311MF	DANVILLE	IN	CALVARY CHAPEL OF CRAWFORDSVILLE IN.
980710			BPED	19990311MS	NEW WHITELAND	IN	HORIZON CHRISTIAN F/SHIP OF INDIANAP
980710	03/11/99	A	BPED	19980716MS	TRAFALGAR	IN	HOOSIER BROADCASTING CORPORATION
980712	03/19/99	A	BPED	19980730MB	MORRIS	IL	SOUTHWEST CHICAGO EDUCATIONAL INC.
980712		B	BPED	19981228MA	MORRIS	IL	THE WBEZ ALLIANCE, INC.
980712		B	BPED	19990318MD	MORRIS	IL	BROADCASTING FOR THE CHALLENGED, INC
980713			BPED	19980827ME	ELGIN	IL	ILLINOIS BIBLE INSTITUTE, INC.
980713			BPED	19990319MH	CARPENTERSVILLE	IL	LIFETALK BROADCASTING ASSOCIATION
980713	03/19/99	A	BPED	19980720MB	PINGREE GROVE	IL	COMMUNITY PUBLIC RADIO INC.
980713		B	BPED	19980417MD	PINGREE GROVE	IL	CHRISTIAN EDUCATIONAL ASSOCIATION
980714			BPED	19990224MA	CUTHBERT	GA	AMERICAN FAMILY ASSOCIATION
980714	03/19/99	A	BPED	19980727MH	EUFAULA	AL	FAITH BROADCASTING, INC.

980715			BPED	19990601MA	GRIDLEY	IL	AMERICAN FAMILY ASSOCIATION
980715			BPED	19990602MB	GRIDLEY	IL	BROADCASTING FOR THE CHALLENGED INC.
980715			BPED	19990602MS	BLOOMINGTON	IL	BLOOMINGTON-NORMAL B/CASTING ASSOCIATION
980715	06/02/99	A	BPED	19980702MB	GRIDLEY	IL	PINEBROOK FOUNDATION, INC.
980716			BPED	19990120MI	LACEY	WA	FAMILY STATIONS, INC.
980716			BPED	19990120MJ	OLYMPIA	WA	BROADCASTING FOR THE CHALLENGED, INC
980716	01/20/99	A	BPED	19980722MA	OLYMPIA	WA	WASHINGTON PUBLIC AFFAIRS NETWORK
980801			BPED	19990114MC	MARINETTE	WI	MARINETTE BROADCASTING FOUNDATION
980801			BPED	19990114MM	FORESTVILLE	WI	NASSAWADOX FM INCORPORATED
980801			BPED	19990120MB	STURGEON BAY	WI	BROADCASTING FOR THE CHALLENGED, INC.
980801			BPED	19990120MD	PESHTIGO	WI	FRIENDS OF RADIO MARIA, INC.
980801	01/20/99	A	BPED	19980811MH	STURGEON BAY	WI	VCY AMERICA INC.
980802			BPED	19990226MF	STERLING CITY	TX	CONCHO PUBLIC BROADCASTING
980802			BPED	19990310MM	BIG SPRING	TX	BROADCASTING FOR THE CHALLENGED, IN
980802			BPED	19990311ML	STANTON	TX	EDUCATIONAL MEDIA FOUNDATION
980802			BPED	19990430MB	BYRNE	TX	EL HISPANO, INC.
980802	03/11/99	A	BPED	19980826MM	BIG SPRING	TX	EDUCATIONAL OPPORTUNITIES INC
980802	05/10/99	A	BPED	19981120MD	BYRNE	TX	SOUTHPOINT EDUCATIONAL RADIO
980803			BPED	19990310MN	BROWNFIELD	TX	BROADCASTING FOR THE CHALLENGED, INC
980803	03/11/99	A	BPED	19980820MA	BROWNFIELD	TX	SALT & LIGHT COMMUNICATIONS INC
980804			BPED	19990310ML	CASPER	WY	BROADCASTING FOR THE CHALLENGED, INC
980804			BPED	19990311MN	CASPER	WY	WCN, INC.
980804	03/11/99	A	BPED	19980821MF	CASPER	WY	SOLID ROCK BROADCASTING INC

980805			BPED	19990310MA	LARAMIE	WY	BROADCASTING FOR THE CHALLENGED, INC
980805			BPED	19990310MF	LARAMIE	WY	LARAMIE UNION BROADCASTING INCORPORA
980805			BPED	19990310MI	LARAMIE	WY	ED COMMUNICATIONS OF CO SPRINGS, INC
980805			BPED	19990311MO	LARAMIE	WY	WCN, INC.
980805			BPED	19990311MP	ALBANY	WY	EDUCATIONAL MEDIA FOUNDATION
980805			BPED	19990311MR	LARAMIE	WY	MOUNTAIN WEST INSPIRATIONAL NETWORK
980805	03/11/99	A	BPED	19980826MA	LARAMIE	WY	UNIVERSITY OF WYOMING
980806			BPED	19990304MC	EFFINGHAM	IL	THE CROSS FOUNDATION
980806			BPED	19990310MO	EFFINGHAM	IL	PANA PUBLIC RADIO, INC
980806	03/11/99	A	BPED	19980810MA	EFFINGHAM	IL	AMERICAN FAMILY ASSOCIATION
980807			BPED	19990311MC	ANNA	OH	FRIENDS OF RADIO MARIA, INC.
980807	03/11/99	A	BPED	19980821MB	BOTKINS	OH	ONLY BELIEVE MINISTRIES INC
980810			BPED	19990311MQ	ANCHORAGE	AK	EDUCATIONAL MEDIA FOUNDATION
980810	03/11/99	A	BPED	19980819MB	PALMER	AK	CHRISTIAN BROADCASTING INC
980811			BPED	19990318ME	BELLINGHAM	WA	WESTERN WASHINGTON UNIVERSITY
980811			BPED	19990319MG	SEQUIM	WA	EDUCATIONAL MEDIA FOUNDATION
980811	03/19/99	A	BPED	19980813ME	PORT ANGELES	WA	PACIFIC LUTHERAN UNIVERSITY, INC.
980813	03/11/99	A	BPED	19980821MD	CUBA	MO	NEW LIFE EVANGELISTIC CENTER, INC.
980813		B	BPED	19981125MA	SALEM	MO	MIRACLE RADIO, INC.
980814			BPED	19990602MF	WITTENBERG	WI	BROADCASTING FOR THE CHALLENGED INC
980814	06/02/99	A	BPED	19980811MJ	WITTENBERG	WI	VCY AMERICA INC.
980815			BPED	19980918MG	ZIONSVILLE	IN	KIDS FIRST INCORPORATED

980815			BPED	19990420MB	LEBANON	IN	HOOISER BROADCASTING CORPORATION
980815			BPED	19990506MH	LEBANON	IN	BROADCASTING FOR THE CHALLENGED, INC
980815			BPED	19990510MG	JAMESTOWN	IN	MARY V. HARRIS FOUNDATION
980815	05/10/99	A	BPED	19980817MZ	LEBANON	IN	HORIZON CHRISTIAN FELLOWSHIP OF INDI
980818	06/02/99	A	BPED	19980804MB	FARMINGTON	NM	KUTE, INC.
980818		B	BPED	19990527ME	FARMINGTON	NM	BROADCASTING FOR THE CHALLENGED, INC
980902			BPED	19990310MC	BEAUMONT	TX	BROADCASTING FOR THE CHALLENGED, INC
980902			BPED	19990310MK	VIDOR	TX	HOUSTON BAY CITY INCORPORATED
980902			BPED	19990311ME	VIDOR	TX	FRIENDS OF RADIO MARIA, INC.
980902	03/11/99	A	BPED	19980911MB	BEAUMONT	TX	CCS RADIO INC
980903			BPED	19990226MJ	OXFORD	AL	BAMA BROADCASTING, INC.
980903			BPED	19990302MI	HEFLIN	AL	COVENANT COMMUNICATIONS, INC.
980903	03/19/99	A	BPED	19980910MB	HEFLIN	AL	JIMMY JARRELL COMMUNICATIONS FOUNDAT
980904			BPED	19990318MC	ALTOONA	PA	BROADCASTING FOR THE CHALLENGED, INC
980904			BPED	19990319MB	CHAMBERSBURG	PA	FOUR RIVERS COMMUNITY B/CASTING CORP
980904	03/19/99	A	BPED	19980921MB	HOLLIDAYSBURG	PA	FRIENDS OF RADIO MARIA INC
980905			BPED	19990115MB	FRANKLIN	KY	LIFETALK BROADCASTING ASSOCIATION
980905			BPED	19990317MC	AUBURN	KY	WAY-FM MEDIA GROUP, INC
980905			BPED	19990319MI	BOWLING GREEN	KY	WESTERN KENTYCKY UNIVERSITY AC 240
980905	03/19/99	A	BPED	19980904MB	GLASGOW	KY	LOMERSET EDUC. B/CASTING FOUNDATION
980906	06/02/99	A	BPED	19980901MM	HEREFORD	TX	SOUTHPOINT EDUCATIONAL RADIO
980906		B	BPED	19990521MA	HEREFORD	TX	EL HISPANO, INC.

980907	06/02/99	A	BPED	19980901ME	CHESTERFIELD	SC	CHRISTIAN EDUCATIONAL ASSOCIATION
980907		B	BPED	19990528MB	CHESTERFIELD	SC	NORTH CAROLINA PUBLIC B/C INCORPORAT
980910			BPED	19981215MB	WINDOM	MN	MINN-IOWA CHRISTIAN BROADCASTING INC
980910			BPED	19990310MG	WINDOM	MN	DES MOINES EARLHAM INCORPORATED
980910	03/11/99	A	BPED	19980925MA	WINDOM	MN	AMERICAN FAMILY ASSOCIATION
980910		A	BPED	19990311MK	WILLMAR	MN	EDUCATIONAL MEDIA FOUNDATION
980911			BPED	19990716MB	BERNARDSVILLE	NJ	NEW JERSEY PUBLIC B/CASTING AUTHORIT
980911	07/19/99	A	BPED	19980923MB	CHATHAM	NJ	WORLD REVIVALS INC
980912			BPED	19990719MC	FOND DU LAC	WI	BROADCASTING FOR THE CHALLENGED, INC
980912	07/19/99	A	BPED	19980923MD	FOND DU LAC	WI	VCY AMERICA INC.
9809W2			BPED	19990318MI	UNION CITY	TN	BROADCASTING FOR THE CHALLENGED, INC
9809W2	03/19/99	A	BPED	19980918MC	UNION CITY	TN	HEARTLAND MINISTRIES INC
9809W3			BPED	19990318ML	YAZOO CITY	MS	BROADCASTING FOR THE CHALLENGED, INC
9809W3	03/19/99	A	BPED	19980922ME	YAZOO CITY	MS	BRIGHT LIGHT BROADCASTING INC
981001			BPED	19990310ME	COLUMBUS	MS	BROADCASTING FOR THE CHALLENGED, INC
981001	03/11/99	A	BPED	19981029MA	COLUMBUS	MS	MISSISSIPPI UNIVERSITY FOR WOMEN
981002			BPED	19990310MB	YUCCA VALLEY	CA	BROADCASTING FOR THE CHALLENGED INC.
981002			BPED	19990310MQ	YUCCA VALLEY	CA	SACRAMENTO BRAIN TRUST INCORPORATED
981002	03/11/99	A	BPED	19981013MB	YUCCA VALLEY	CA	PENFOLD COMMUNICATIONS, INC.
981003			BPED	19990318MB	ARKADELPHIA	AR	HENDERSON STATE UNIVERSITY
981003			BPED	19990318MH	ARKADELPHIA	AR	BROADCASTING FOR THE CHALLENGED, INC

981003	03/19/99	A	BPED	19981030MC	AR	ARKADELPHIA	AR	BRIGHT LIGHT BROADCASTING INC.
981004			BPED	19981023MO	AZ	BULLHEAD CITY	AZ	CSN INTERNATIONAL
981004			BPED	19990506MB	AZ	KINGMAN	AZ	BROADCASTING FOR THE CHALLENGED, INC
981004			BPED	19990510MD	AZ	LAKE HAVASU CITY	AZ	EDUCATIONAL MEDIA FOUNDATION
981004			BPED	19990510ME	UT	ST. GEORGE	UT	EDUCATIONAL MEDIA FOUNDATION
981004	05/10/99	A	BPED	19981013MO	AZ	KINGMAN	AZ	CEDAR BROADCASTING, INC.
981005			BPED	19990506MD	MS	BILOXI	MS	BROADCASTING FOR THE CHALLENGED, INC
981005			BPED	19990507MC	MS	BILOXI	MS	AMERICAN FAMILY ASSOCIATION
981005			BPED	19990510MC	MS	BILOXI	MS	BIBLE BROADCASTING NETWORK, INC.
981005			BPED	19990510MJ	MS	D'IBERVILLE	MS	FRIENDS OF RADIO MARIA, INC.
981005	05/10/99	A	BPED	19981026MB	MS	BILOXI	MS	GREATER MISSISSIPPI BROADCASTING INC
981006			BPED	19990429MA	MS	FOREST	MS	AMERICAN FAMILY ASSOCIATION
981006	05/10/99	A	BPED	19981026MA	MS	FOREST	MS	GREATER MISSISSIPPI BROADCASTING INC
981008			BPED	19990507MB	NE	GRAND ISLAND	NE	ROCHESTER COMMUNITY RADIO INCORPORAT
981008	05/10/99	A	BPED	19981014MA	NE	GRAND ISLAND	NE	AMERICAN FAMILY ASSOCIATION
981009			BPED	19990402MC	TN	PARIS	TN	ABUNDANT LIFE BROADCASTING
981009			BPED	19990506MF	TN	PARIS	TN	BROADCASTING FOR THE CHALLENGED, INC
981009	05/10/99	A	BPED	19981026MD	TN	WAVERLY	TN	TENNESSEE ED INFORMATIONAL INCORPORA
981010			BPED	19990526MC	MT	LOCKWOOD	MT	CSN INTERNATIONAL
981010			BPED	19990527MC	MT	BILLINGS	MT	BROADCASTING FOR THE CHALLENGED, INC.
981010			BPED	19990602MJ	MT	BILLINGS	MT	BILLINGS COMMUNITY CABLE CORPORATION
981010	06/02/99	A	BPED	19981030MB	MT	BILLINGS	MT	SOLID ROCK BROADCASTING, INC.

981011			BPED	19990527MD	BISMARCK	ND	BROADCASTING FOR THE CHALLENGED, INC.
981011			BPED	19990602MC	LINCOLN	ND	BROADCASTING FOR THE CHALLENGED, INC.
981011			BPED	19990602MD	BISMARCK	ND	EDUCATIONAL MEDIA FOUNDATION
981011			BPED	19990602MT	LINCOLN	ND	CSN INTERNATIONAL
981011	06/02/99	A	BPED	19981019MA	LINCOLN	ND	EDUCATIONAL MEDIA FOUNDATION
981012			BPED	19990628MB	RENNERT	NC	BD OF TRUSTEES OF THE U OF NC-CHAPEL HILL
981012	06/28/99	A	BPED	19981022MB	LUMBERTON	NC	BILLY RAY LOCKLEAR EVAN. ASSOC., INC
981014			BPED	19980126MC	TROY	MO	MISSOURI RIVER CHRISTIAN BROADCAST/G
981014	09/07/99	A	BPED	19981020MC	BOWLING GREEN	MO	NEW LIFE EVANGELISTIC CTR, INC.
981101			BPED	19990301MC	HOBBS	NM	ABUNDANT LIFE BROADCASTING
981101			BPED	19990317MB	LOVINGTON	NM	YOUR CHRISTIAN COMPANION NETWORK, INC.
981101			BPED	19990318MK	HOBBS	NM	BROADCASTING FOR THE CHALLENGED, INC
981101	03/19/99	A	BPED	19981112MA	HOBBS	NM	EL HISPANO, INC.
981104			BPED	19990528MH	GREENCASTLE	IN	HOOSIER BROADCASTING CORPORATED
981104	06/02/99	A	BPED	19981120MA	GREENCASTLE	IN	PENSACOLA CHRISTIAN COLLEGE INC.
981105			BPED	19990528MD	BRAINERD	MN	ROCHESTER COMMUNITY RADIO INCORPORAT
981105			BPED	19990602MG	BAXTER	MN	CSN INTERNATIONAL
981105	06/02/99	A	BPED	19981113MC	BRAINERD	MN	MINNESOTA PUBLIC RADIO
981106			BPED	19990601MB	CAMP WOOD	TX	CHRISTAN ED ASSOCIATION
981106	06/02/99	A	BPED	19981119MB	CAMP WOOD	TX	HOUSTON CHRISTIAN BROADCASTERS, INC.
981107			BNPED	19991028AAM	SPRINGFIELD	OH	BROADCASTING FOR THE CHALLENGED, INC.
981107	11/04/99	A	BPED	19981105MF	SOUTH VIENNA	OH	SALT & LIGHT COMMUNICATIONS, INC.

981108			BNPED	19991026AAG	SAN ANGELO	TX	BROADCASTING FOR THE CHALLENGED, INC.
981108	11/04/99	A	BPED	19981105ME	CARLSBAD	TX	OPTIMUM IMPACT, INC.
981201	05/10/99	A	BPED	19981231MA	MARLETTE	MI	GREAT LAKES COMMUNITY BROADCASTING, INC.
981201			BPED	19990510MA	SPEAKER TWP.	MI	SPEAKER RADIO
981202			BPED	19990208MA	TRINIDAD	CO	AMERICAN FAMILY ASSOCIATION
981202			BPED	19990601MF	TRINIDAD	CO	EDUC. COMM. OF COLORADO SPRINGS, INC
981202	06/02/99	A	BPED	19981208ME	STARKVILLE	CO	COLORADO COLLEGE
981203			BPED	19981009MA	LINTON	IN	BETHEL BAPTIST CHURCH
981203			BPED	19990525MA	CLOVERDALE	IN	HOOSIER BROADCASTING CORPORATION
981203	06/02/99	A	BPED	19981203ML	LADOGA	IN	CSN INTERNATIONAL
981203		A	BPED	19981203MB	OOLITIC	IN	GOOD SAMARITAN ED RADIO INC
981204		B	BPED	19990602MA	GARDNER	MA	FRIENDS OF RADIO MARIA, INC.
981204	06/02/99	A	BPED	19981207MA	WINCHENDON	MA	TOCCOA FALLS COLLEGE
981206			BPED	19990602MH	BAKER	OR	CSN INTERNATIONAL
981206	06/02/99	A	BPED	19981221MB	BAKER	OR	AMERICAN FAMILY ASSOCIATION
981207		B	BPED	19990628MG	SUGAR GROVE	IL	EDUCATIONAL MEDIA FOUNDATION
981207	06/28/99	A	BPED	19981211MF	BRISTOL	IL	BEST MEDIA INC.
981208	07/19/99	A	BMPED	19981230ME	MASON CITY	IA	AMERICAN FAMILY ASSOCIATION
981208		B	BPED	19980520MB	LANESBORO	MN	BLUFF COUNTRY COMMUNITY RADIO, INC.
981208		B	BPED	19990202MB	LAKE MILLS	IA	MINN-IOWA CHRISTIAN BROADCASTING, IN

981209			BPED	19990719MI	JANESVILLE	WI	FAMILY STATIONS, INC.
981209	07/19/99	A	BPED	19981224MA	JANESVILLE	WI	VCY AMERICA, INC.
981210			BNPED	19991004AAB	LAYTONVILLE	CA	FAMILY STATIONS, INC.
981210			BNPED	19991004AAI	LAYTONVILLE	CA	EDUCATIONAL MEDIA FOUNDATION
981210	10/04/99	A	BPED	19981215MI	LAYTONVILLE	CA	REDWOOD COMMUNITY RADIO, INC
981211			BNPED	19990924AAL	OAKLAND	ME	BROADCASTING FOR THE CHALLENGED, INC.
981211	10/04/99	A	BPED	19981211MC	OAKLAND	ME	LIGHT OF LIFE MINISTRIES INC
981212			BNPED	19991117ABJ	MADISONVILLE	KY	INDIANA COMMUNITY RADIO CORPORATION
981212	11/17/99	A	BPED	19981211MA	MADISONVILLE	KY	PENNYRILE CHRISTIAN COMMUNITY, INC.
981213			BPED	19981203IA	HOWE	IN	CSN INTERNATIONAL
981213			BPED	19990720MD	ORLEANS	MI	PENSACOLA CHRISTIAN COLLEGE, INC.
981213			BNPED	19991116AIT	LEVEL PARK	MI	BROADCASTING FOR THE CHALLENGED, INC.
981213			BNPED	19991117ABI	RICHLAND	MI	LIVING PROOF, INC.
981213	11/17/99	A	BPED	19981208MF	LEVEL PARK	MI	PENSACOLA CHRISTIAN COLLEGE, INC.
9812SS			BPED	19990630MC	CROTHERSVILLE	IN	CSN INTERNATIONAL
9812SS			BPED	19990719MB	HOPE	IN	BROADCASTING FOR THE CHALLENGED, INC
9812SS	07/19/99	A	BPED	19981224MC	HOPE	IN	GOOD SHEPHERD RADIO, INC.
990101			BPED	19990428MD	OSKALOOSA	IA	SOLID ROCK BROADCASTING, INC..
990101	05/10/99	A	BPED	19990113MA	OSKALOOSA	IA	UNIVERSITY OF NORTHERN IOWA
990102			BPED	19990420ME	FROSTPROOF	FL	RADIO TRAINING NETWORK, INC.
990102			BPED	19990714MF	FROSTPROOF	FL	WEST COAST EDUCATIONAL INCORPORATED
990102	07/19/99	A	BPED	19990119MA	LAKEMONT	FL	REVIVAL CHRISTIAN MINISTRIES INC.

990104			BPED	19990719MA	WESTWOOD	CA	CSN INTERNATIONAL
990104	07/19/99	A	BPED	19990107MA	GREENVILLE	CA	IMMACULATE HEART RADIO
990105			BPED	19990126MD	OLSBURG	KS	THE UNIVERSITY OF KANSAS
990105			BPED	19990714MG	JUNCTION CITY	KS	REDWOOD VALLEY B/CASTERS INC.
990105			BPED	19990719MF	JUNCTION CITY	KS	BROADCASTING FOR THE CHALLENGED, INC
990105	07/19/99	A	BPED	19990112MC	JUNCTION CITY	KS	VCY AMERICA, INC.
990106			BPED	19990610MD	WARRENTON	OR	PACIFIC LUTHERN UNIVERSITY INC.
990106			BPED	19990714MD	ASTORIA	OR	CATHOLIC BROADCASTING NORTHWEST, INC
990106			BPED	19990719MK	ROCKAWAY BEACH	OR	EDUCATIONAL MEDIA FOUNDATION
990106	07/19/99	A	BPED	19990104ME	ASTORIA	OR	WORLD RADIO NETWORK INC
990107			BNPED	19990924AAX	CRAIG	CO	BROADCASTING FOR THE CHALLENGED, INC.
990107			BNPED	19991004AAG	MEEKER	CO	EDUCATIONAL COMMUNICATIONS OF COLORADO SI
990107			BNPED	19991004AAL	STEAMBOAT SPRING	CO	EDUCATIONAL COMMUNICATIONS OF COLORADO SI
990107	10/04/99	A	BPED	19990129ME	CRAIG	CO	PUBLIC BROADCASTING OF COLORADO, INC
990109			BPED	19990823MA	WEST CLARKSTON	WA	LIVING FAITH FELLOWSHIP EDUCATIONAL MINISTR
990109			BNPED	19991004AAC	GENESEE	ID	THE MOODY BIBLE INSTITUTE OF CHICAGO
990109			BNPED	19991004AAJ	CLARKSTON	WA	CSN INTERNATIONAL
990109	10/04/99	A	BPED	19990129MD	WEST CLARKSTON	WA	UPPER COLUMBIA MEDIA CORP
990110			BPED	19990625MD	SCIENCE HILL	KY	WESTERN KENTUCKY UNIVERSITY AC240
990110			BPED	19990628MC	SOMERSET	KY	EDUCATIONAL MEDIA FOUNDATION
990110	06/28/99	A	BPED	19990114ME	CORBIN	KY	EASTERN KENTUCKY UNIVERSITY
990111	07/19/99	A	BPED	19990120MC	TIPTON	IN	EDUCATIONAL OPPORTUNITIES, INC.

990111		B	BPED	19990714ME	MUNCIE	IN	HYMN TIME, INC.
9901XP			BPED	19990729MB	COCOA BEACH	FL	BROADCASTING FOR THE CHALLENGED, INC
9901XP			BPED	19990730MA	COCOA BEACH	FL	BLACK MEDIA WORKS, INC.
9901XP			BPED	19990730MB	MERRITT ISLAND	FL	CENTRAL FL. EDUC. FOUNDATION, INC.
9901XP			BPED	19990730MD	MERRITT ISLAND	FL	MERRITT ISLAND PLUBLIC RADIO, INC.
9901XP	08/01/99	A	BPED	19990121MA	COCOA BEACH	FL	CSN INTERNATIONAL
990201			BPED	19990223MB	BOONEVILLE	AR	VISION MINISTRIES, INC.
990201			BPED	19990618MB	FORT SMITH	AR	BROADCASTING FOR THE CHALLENGED, INC
990201			BPED	19990628MD	VAN BUREN	AR	EDUCATIONAL MEDIA FOUNDATION
990201	06/28/99	A	BPED	19990211MA	RUSSELLVILLE	AR	EDUCATIONAL OPPORTUNITIES, INC.
990203			BPED	19990826MA	FINDLAY	OH	ASSOCIATED CHRISTIAN BROADCASTERS, INC
990203			BPED	19990917ME	FINDLAY	OH	EDUCATIONAL MEDIA FOUNDATION
990203	09/17/99	A	BPED	19990216MB	FINDLAY	OH	CHURCH OF THE LIVING GOD MINISTRIES
990204			BNPED	20000118AAB	PORT O'CONNOR	TX	BROADCASTING FOR THE CHALLENGED, INC.
990204			BNPED	20000118ADE	PORT O'CONNOR	TX	SAN ANTONIO COMFORT INCORPORATED
990204	01/18/00	A	BPED	19990218MA	PORT O'CONNOR	TX	HOUSTON CHRISTIAN BROADCASTERS, INC.
990302			BPED	19990903MA	FRISCO	CO	EDUC. COMM. OF COLORADO SPRINGS, INC
990302			BPED	19990903MB	LEADVILLE	CO	EDUC. COMM. OF COLORADO SPRINGS, INC
990302			BPED	19990903MG	SALIDA	CO	ED COMMUNICATIONS OF CO SPRINGS INC
990302	09/07/99	A	BPED	19990329MC	LEADVILLE	CO	TRUSTEES OF THE UN OF NORTHERN CO
990303			BPED	19990907MB	JAMESTOWN	ND	EDUCATIONAL MEDIA FOUNDATION
990303	09/07/99	A	BPED	19990331MA	JAMESTOWN	ND	ABUNDANT LIFE BROADCASTING

990304			BPED	19990901MC	GALLUP	NM	BROADCASTING FOR THE CHALLENGED, INC
990304			BPED	19990907MC	GALLUP	NM	EDUCATIONAL MEDIA FOUNDATION
990304	09/07/99	A	BPED	19990319ME	GRANTS	NM	THE CITY OF ALBUQUERQUE, NM
990304		A	BPED	19990325MD	MENTMORE	NM	CSN INTERNATIONAL
990305		A	BPED	19980316MD	KEY WEST	FL	SOUTHERNMOST EDUCATIONAL INCORPORATED
990305			BPED	19990901MD	LEXINGTON	OH	BROADCASTING FOR THE CHALLENGED, INC
990305	09/07/99	A	BPED	19990302MG	LEXINGTON	OH	HELLINGER FOUNDATION, INC.
990306			BPED	19990329IA	MONTROSE	CO	NORTH FORK VALLEY PUBLIC RADIO, INC
990306		B	BPED	19990505MA	DURANGO	CO	KUTE, INC.
990306		B	BPED	19990916MB	DURANGO	CO	BROADCASTING FOR THE CHALLENGED, INC
990306	09/17/99	A	BPED	19990318MG	DURANGO	CO	SAN JUAN COLLEGE
990307			BPED	19990916MC	WOODSTOCK	IL	BROADCASTING FOR THE CHALLENGED, INC
990307			BPED	19990917MI	WOODSTOCK	IL	FAMILY STATIONS INC.
990307			BPED	19990917MM	WOODSTOCK	IL	CORNERSTONE COMMUNITY RADIO INC.
990307	09/17/99	A	BPED	19990316MG	WOODSTOCK	IL	PENSACOLA CHRISTIAN COLLEGE, INC
990308			BPED	19990914MA	DEL RIO	TX	HOUSTON BAY CITY INCORPORATED
990308			BPED	19990916MF	DEL RIO	TX	BROADCASTING FOR THE CHALLENGED, INC
990308	09/17/99	A	BPED	19990316MF	DEL RIO	TX	WORLD RADIO NETWORK, INC
990309			BNPED	19991115AAR	ELIZABETHTOWN	OH	REDWOOD VALLEY BROADCASTERS INCORPORATEI
990309			BNPED	19991116AIW	HARRISON	OH	BROADCASTING FOR THE CHALLENGED, INC.
990309			BNPED	19991117ABN	MIAMITOWN	OH	COMMUNITY PUBLIC RADIO, INC.
990309	11/17/99	A	BPED	19990325MC	MIAMITOWN	OH	SPRYEX COMMUNICATIONS, INC.
990310			BPED	19990719MD	DOVER	NJ	BROADCASTING FOR THE CHALLENGED, INC

990310			BPED	19990730ME	NETCONG	NJ	NEW JERSEY PUBLIC B/CASTING AUTHORITY
990310	08/01/99	A	BPED	19990305MA	DOVER	NJ	CHRISTIAN EDUCATIONAL ASSOCIATION
9903TP	12/15/99	A	BPED	19990301MA	JACKSON	WY	ABUNDANT LIFE BROADCASTING
9903TP			BNPED	19991210AAG	JACKSON	WY	BROADCASTING FOR THE CHALLENGED, INC
9903TP			BNPED	19991214ACD	JACKSON	WY	MOODY BIBLE INSTITUTE
990401			BPED	19990510MB	SEARCY	AR	HARDING UNIVERSITY
990401			BNPED	19990924AAY	SEARCY	AR	BROADCASTING FOR THE CHALLENGED, INC
990401	10/04/99	A	BPED	19990402MB	MELBOURNE	AR	ABUNDANT LIFE BROADCASTING
990402	10/04/99		BNPED	19990927AAP	BEATRICE	NE	AMERICAN FAMILY ASSOCIATION
990402			BNPED	19991004ABZ	HICKMAN	NE	EDUCATIONAL MEDIA FOUNDATION
990403			BPED	19990610MF	MARION	OH	THE CEDARVILLE COLLEGE
990403			BPED	19990901ME	MARION	OH	BROADCASTING FOR THE CHALLENGED, INC
990403	09/07/99	A	BPED	19990426MB	MARION	OH	KAYSER BROADCAST MINISTRIES, INC.
990404			BPED	19990623ME	READING	MI	GREAT LAKES COMMUNITY B/CASTING, INC
990404			BNPED	19990928AAV	LAKE ODESSA	MI	GREAT LAKES COMMUNITY BROADCASTING, INC.
990404			BNPED	19991018AAJ	ALLEGAN	MI	PENSACOLA CHRISTIAN COLLEGE, INC.
990404			BNPED	19991026AAD	BATTLE CREEK	MI	BROADCASTING FOR THE CHALLENGED, INC.
990404			BNPED	19991028AAE	COLDWATER	MI	MICHIANA CHRISTIAN BROADCASTERS, INC.
990404			BNPED	19991029AAF	CLYDE TOWNSHIP	MI	LARLEN COMMUNICATIONS INC.
990404			BNPED	19991104AAM	CLARKLAKE	MI	GREAT LAKES COMMUNITY BROADCASTING, INC.
990404	11/04/99	A	BPED	19990406MB	BATTLE CREEK	MI	PENSACOLA CHRISTIAN COLLEGE, INC.
990405	09/17/99	A	BPED	19990415MA	EMERALDA	FL	SUNBELT EDUCATIONAL BROADCASTING INC
990405			BPED	19990916MA	WEIRSDALE	FL	BROADCASTING FOR THE CHALLENGED, INC

990405			BPED	19990917MO	TAVARES	FL	CENTRAL FLORIDA ED FOUNDATION, INC
990406			BPED	19990916MG	BUTTE	MT	BROADCASTING FOR THE CHALLENGED, INC
990406			BPED	19990917MB	WHITEHALL	MT	COLORADO CHRISTIAN UNIVERSITY
990406			BPED	19990917MG	BUTTE	MT	FAMILY STATIONS, INC.
990406			BPED	19990917MJ	BOZEMAN	MT	EDUCATIONAL MEDIA FOUNDATION
990406			BPED	19990917ML	BUTTE	MT	YOUR NETWORK OF PRAISE INC.
990406	09/17/99	A	BPED	19990430MA	BUTTE	MT	ABUNDANT LIFE BROADCASTING
990407	01/18/00	A	BPED	19990407MC	INYOKERN	CA	LIVING PROOF, INC.
990407			BNPED	20000118AAE	INYOKERN	CA	BROADCASTING FOR THE CHALLENGED, INC
990407			BNPED	20000118AAQ	RIDGECREST	CA	EDUCATIONAL MEDIA FOUNDATION
990407			BNPED	20000118AAO	TEHACHAPI	CA	EDUCATIONAL MEDIA FOUNDATION
990407			BNPED	20000118AAN	BARSTOW	CA	EDUCATIONAL MEDIA FOUNDATION
990408	01/18/00	A	BPED	19990407ME	WOOSTER	OH	THE CEDARVILLE COLLEGE
990408			BNPED	20000118AAK	BRUNSWICK	OH	CSN INTERNATIONAL
990408			BNPED	20000118AAR	WADSWORTH	OH	EDUCATIONAL MEDIA FOUNDATION
990408			BNPED	20000118AEN	WADSWORTH	OH	MARY V. HARRIS FOUNDATION
990409			BNPED	20000223AAM	SOCORRO	NM	BROADCASTING FOR THE CHALLENGED, INC.
990409			BNPED	20000301AAX	SOCORRO	NM	EDUCATIONAL MEDIA FOUNDATION
990409	03/03/00	A	BPED	19990428MC	SOCORRO	NM	REGENTS OF THE UN OF NEW MEXICO
990410			BNPED	19991004AAH	STIGLER	OK	EDUCATIONAL MEDIA FOUNDATION
990410	10/04/99	A	BPED	19990420MF	STUART	OK	LIGHTHOUSE OF PRAYER, INC.
990411			BPED	19990907MA	KETTLEMAN CITY	CA	LIVING PROOF, INC.
990411			BNPED	20000518ACG	ROSEDALE	CA	BROADCASTING FOR THE CHALLENGED, INC.

990411			BNPED	20000518ACI	SHAFTER	CA	BRIDGE BROADCASTING, INC.
990411			BNPED	20000518ACN	LOST HILLS	CA	SJD CHRISTIAN BROADCASTING, INC.
990411	05/18/00	A	BPED	19990407MD	ROSEDALE	CA	CSN INTERNATIONAL
990501			BNPH	19991004AAD	CALHOUN	GA	LIFETALK BROADCASTING ASSOCIATION
990501			BNPED	19991004AAF	CALHOUN	GA	WEST COAST EDUCATIONAL INCORPORATED
990501	10/04/99	A	BPED	19990519MI	REDBUD	GA	HELLINGER FOUNDATION OF GA., INC.
990502			BPED	19990907MD	IDAHO FALLS	ID	EDUCATIONAL MEDIA FOUNDATION
990502	09/07/99	A	BPED	19990527MF	RIRIE	ID	FAITH COMMUNICATIONS CORP.
990503			BNPED	19991026AAE	VALDOSTA	GA	BROADCASTING FOR THE CHALLENGED, INC.
990503			BNPED	19991104AAJ	CROSS CITY	FL	SPIRIT RADIO OF NORTH FLORIDA, INC.
990503	11/04/99	A	BPED	19990524MC	LIVE OAK	FL	MELODY CHRISTIAN ACADEMY
990504			BNPED	19991028AAF	MILLEDGEVILLE	GA	BROADCASTING FOR THE CHALLENGED, INC.
990504			BNPED	19991103ABB	TOOMSBORO	GA	AUGUSTA RADIO FELLOWSHIP INSTITUTE, INC.
990504	11/04/99	A	BPED	19990514MC	MILLEDGEVILLE	GA	LIFE RADIO MINISTRIES
990505			BNPED	19991101ABN	WHITESBURG	GA	EDUCATIONAL MEDIA FOUNDATION
990505			BNPED	19991102AAM	WHITESBURG	GA	BELCHER SANTA MARIA BROADCASTING INC.
990505	11/04/99	A	BPED	19990520ME	YATES	GA	BEST MEDIA, INC.
990506			BPED	19990902MA	MACKINAW CITY	MI	GREAT LAKES COMMUNITY BROADCASTING *
990506			BNPED	19991028ACT	CHARLEVOIX	MI	BROADCASTING FOR THE CHALLENGED, INC.
990506			BNPED	19991104AAP	GOOD HART	MI	MICHIGAN COMMUNITY RADIO
990506			BNPED	19991104ABG	RACO	MI	MICHIGAN COMMUNITY RADIO
990506	11/04/99	A	BPED	19990528MG	CHARLEVOIX	MI	GREAT LAKES COMMUNITY BROADCASTING

990508			BNPED	19991029AAH	LAKE HOPATCONG	NJ	CSN INTERNATIONAL
990508			BNPED	19991101ABJ	HOPATCONG	NJ	EDUCATIONAL MEDIA FOUNDATION
990508			BPED	19991101ABM	SUSSEX	NJ	NEW JERSEY PUBLIC BROADCASTING AUTH.
990508			BNPED	19991104AAH	HOPATCONG	NJ	YOUNGSHINE MEDIA, INC.
990508	11/04/99	A	BPED	19990519MB	HOPATCONG	NJ	BEST MEDIA, INC.
990509	11/04/99	A	BPED	19990514MB	BROOKINGS	OR	PACIFIC CASCADE COMMUNICATIONS CORP.
990509			BNPED	19991028AAL	BROOKINGS	OR	BROADCASTING FOR THE CHALLENGED, INC.
990510			BNPED	19991029AAG	WHEELER	OR	TILlicum FOUNDATION
990510	11/04/99	A	BPED	19990503MA	TILLAMOOK	OR	OREGON PUBLIC BROADCASTING
990511	11/17/99	A	BPED	19990526MB	GREENVILLE	TX	BILL R. WRIGHT
990511			BNPED	19991115AAS	COMMERCE	TX	FT. WORTH STEPHENSVILLE FM, INC.
990511			BNPED	19991116AIV	GREENVILLE	TX	BROADCASTING FOR THE CHALLENGED, INC.
990512			BNPED	20000118ABT	MARSHFIELD	MA	UNIVERSITY OF MASSACHUSETTS
990512			BNPED	20000118ADQ	MARSHFIELD	MA	THE TALKING INFORMATION CENTER
990512	01/18/00	A	BPED	19990519MC	MARSHFIELD	MA	BEST MEDIA, INC.
990514			BNPED	19991213AAJ	ARCADE	NY	FAMILY LIFE MINISTRIES, INC.
990514	12/15/99	A	BPED	19990630MA	ARCADE	NY	CSN INTERNATIONAL
990516			BNPED	20000229AAN	MORGANFIELD	KY	BISHOP COMMUNITY RADIO
990516	05/03/00	A	BPED	19990505MB	STURGIS	KY	HEARTLAND MINISTRIES, INC.
990601			BNPED	19991013AAE	CHESANING	MI	GREAT LAKES COMMUNITY BROADCASTING
990601			BNPED	19991026AAF	JACKSON	MI	BROADCASTING FOR THE CHALLENGED, INC.
990601			BNPED	19991103ABT	EAGLE	MI	MICHIGAN COMMUNITY RADIO

990601	11/04/99	A	BPED	19990607ME	JACKSON	MI	GREAT LAKES COMMUNITY BROADCASTING
990602			BNPED	19991102AAN	BATH	NC	NORTH CAROLINA PUBLIC BROADCAST INC
990602	11/04/99	A	BPED	19990621MD	BATH	NC	EDUCATIONAL INFORMATION CORPORATION
990604			BPED	19990806MA	ASTORIA	OR	TILlicum FOUNDATION
990604			BNPED	19991117ABK	TILLAMOOK	OR	EDUCATIONAL MEDIA FOUNDATION
990604			BNPED	19991117ABL	OCEAN PARK	WA	EDUCATIONAL MEDIA FOUNDATION
990604	11/17/99		BPED	19990610ME	HAMMOND	OR	PACIFIC LUTHERN UNIVERSITY INC.
990605			BNPED	20000118ADC	PENDERGRASS	GA	BELCHER SANTA MARIA BROADCASTING
990605	01/18/00	A	BPED	19990630MB	PENDERGRASS	GA	WAVES OF MERCY PRODUCTIONS, INC.
990606	01/18/00	A	BPED	19990618MC	THOMASVILLE	GA	ST BD OF REGENTS OF FLORIDA
990606			BNPED	19991214AAJ	GREENVILLE	FL	CSN INTERNATIONAL
990606			BNPED	20000111AGV	PAVO	GA	LIVING PROOF, INC.
990606			BNPED	20000118AAL	ST. MARKS	FL	CSN INTERNATIONAL
990606			BNPED	20000118AEM	MONTICOLLO	FL	EDUCATIONAL MEDIA FOUNDATION
990607	01/18/00	A	BPED	19990618MA	ORLEANS	MA	LOWER CAPE COMMUNICATIONS, INC.
990607			BNPED	20000118AAH	SCITUATE	MA	CSN INTERNATIONAL
990607			BNPED	20000118ABS	ORLEANS	MA	UNIVERSITY OF MASSACHUSETTS, BOSTON
990607			BNPED	20000118ADA	WELLFLEET	MA	LIVING PROOF, INC.
990609			BNPED	20000428AAJ	BARNEGAT	NJ	BROADCASTING FOR THE CHALLENGED, INC.
990609			BNPED	20000502AAI	BARNEGAT	NJ	WWN EDUCATIONAL RADIO CORPORATION
990609			BNPED	20000503ABB	BARNEGAT	NJ	JC RADIO, INC.
990609	05/03/00	A	BPED	19990629MA	BARNEGAT	NJ	HOPE CHRISTIAN CHURCH OF MARLTON INC

990610			BNPED	19991214AAE	CICERO	IN	CSN INTERNATIONAL
990610			BNPED	19991214AAG	MILFORD	IL	CSN INTERNATIONAL
990610			BNPED	19991214AAL	NORTH JUDSON	IN	LIVING PROOF, INC.
990610			BNPED	19991214ACF	OAKFORD	IN	HOOSIER BROADCASTING CORPORATION
990610	12/15/99	A	BPED	19990602MI	OAKFORD	IN	PENSACOLA CHRISTIAN COLLEGE, INC.
990611			BNPED	19991213AAD	IOWA CITY	IA	BROADCASTING FOR THE CHALLENGED, INC.
990611			BNPED	19991215AAE	WAPELLO	IA	EDUCATIONAL MEDIA FOUNDATION
990611	12/15/99	A	BPED	19990602MX	WILLIAMSBURG	IA	FAMILY STATIONS, INC.
990615			BNPED	19991210AAF	ROSWELL	NM	BROADCASTING FOR THE CHALLENGED, INC.
990615	12/15/99	A	BPED	19990628MF	ROSWELL	NM	EDUCATIONAL MEDIA FOUNDATION
9906CC			BNPED	19991210AAE	PADUCAH	KY	BROADCASTING FOR THE CHALLENGED, INC.
9906CC	12/15/99	A	BPED	19990621MB	LEDBETTER	KY	HEARTLAND MINISTRIES, INC.
990701			BNPED	19991116AIU	SCOTTSBLUFF	NE	BROADCASTING FOR THE CHALLENGED, INC.
990701			BNPED	19991117ABD	MITCHELL	NE	CSN INTERNATIONAL
990701			BNPED	19991117ABM	SCOTTSBLUFF	NE	EDUCATIONAL MEDIA FOUNDATION
990701	11/17/99		BPED	19990714MB	SCOTTSBLUFF	NE	PENSACOLA CHRISTIAN COLLEGE, INC.
990703			BNPED	19991117ABE	BAKER	OR	CSN INTERNATIONAL
990703	11/17/99	A	BPED	19990714MC	BAKER	OR	SOLID ROCK BROADCASTING INC.
990704	11/17/99	A	BPED	19990729MA	CARTHAGE	TX	AMERICAN FAMILY ASSOCIATION
990704			BNPED	19991112AAJ	MANSFIELD	LA	HYMN TIME, INC.
990705			BNPED	20000118AAG	LEXINGTON	MA	CSN INTERNATIONAL
990705			BNPED	20000118AAI	GARDNER	MA	CSN INTERNATIONAL

990705			BNPED	20000118ABW	STOW	MA	UNIVERSITY OF MASSACHUSETTS
990705	01/18/00	A	BPED	19990726MA	MAYNARD	MA	MAYNARD SCHOOL COMMITTEE
990707			BPED	19991025ACA	BEAR CREEK TOWNSHIP	MI	SUPERIOR COMMUNICATIONS
990707			BNPED	19991122ABA	CENTERVILLE TOWNSHIP	MI	GREAT LAKES COMMUNITY BROADCASTING, INC.
990707	01/18/00	A	BPED	19990721MA	ROSCOMMON	MI	GREAT LAKES COMMUNITY B/CASTING, INC
990708	01/18/00	A	BPED	19990714MA	ESPANOLA	NM	NORTHERN NEW MEXICO PUBLIC RADIO, IN
990708			BPED	19990812MA	ARROYO SECO	NM	REGENTS OF THE UNIV OF NEW MEXICO
990708			BNPED	20000118ABX	LAS VEGAS	NM	REGENTS OF THE UNIV OF NEW MEXICO
990708			BNPED	20000118AEL	ALCALDE	NM	FAMILY STATIONS, INC
990709			BNPED	19991215ABN	ROSWELL	NM	EDUCATIONAL MEDIA FOUNDATION
990709			BNPED	20000118AAD	CLOVIS	NM	BROADCASTING FOR THE CHALLENGED, INC.
990709			BNPED	20000118AAJ	CANNON AFB	NM	CSN INTERNATIONAL
990709			BNPED	20000118ABH	CLOVIS	NM	EDUCATIONAL MEDIA FOUNDATION
990709			BNPED	20000118ACA	ALAMOGORDO	NM	BROADCASTING FOR THE CHALLENGED, INC.
990709			BNPED	20000118ACM	ROSWELL	NM	BROADCASTING FOR THE CHALLENGED, INC.
990709			BNPED	20000118ADB	ALAMOGORDO	NM	POPLAR BLUFF EDUCATIONAL INC
990709			BNPED	20000118ADH	CLOVIS	NM	SAN ANTONIO COMFORT INCORPORATED
990709		A	BPED	19990521MD	ALAMOGORDO	NM	YOUR CHRISTIAN COMPANION NETWORK, INC.
990709	01/18/00	A	BPED	19990723MA	PORTALES	NM	YOUR CHRISTIAN COMPANION INC.
990710			BNPED	20000118ABG	GRANDFIELD	OK	EDUCATIONAL MEDIA FOUNDATION
990710	01/18/00	A	BPED	19990723MB	ALTUS	OK	CAMERON UNIVERSITY
990711			BNPED	20000113AAN	BAKER CITY	OR	OREGON PUBLIC BROADCASTING
990711	01/18/00	A	BPED	19990714MH	BAKER	OR	BRIGHT LIGHT BROADCASTING, INC.

990801			BNPED	19991117ABO	RUST TOWNSHIP	MI	MICHIGAN COMMUNITY RADIO
990801	11/17/99		BPED	19990806MB	HUBBARD LAKE	MI	GREAT LAKES COMMUNITY BROADCASTING
990802	01/18/00	A	BPED	19990830MJ	PAMPA	TX	SALT & LIGHT COMMUNICATIONS, INC.
990802			BNPED	20000118ACQ	PAMPA	TX	GREAT PLAINS CHRISTIAN RADIO INC.
990802			BNPED	20000118AER	WOODWARD	OK	UNIVERSITY OF OKLAHOMA
990803	01/18/00	A	BPED	19990824MA	DUMAS	AR	SOUTHPOINT EDUCATIONAL RADIO, INC.
990803			BNPED	20000118AET	GREENVILLE	MS	BROADCASTING FOR THE CHALLENGED, INC.
990804	01/18/00	A	BPED	19990804MD	FARMERSVILLE	IN	PENSACOLA CHRISTIAN COLLEGE, INC.
990804			BNPED	20000118AEP	WADESVILLE	IN	INDIANA COMMUNITY RADIO CORPORATION
990806			BNPED	20000118AAC	ST. GEORGE	UT	BROADCASTING FOR THE CHALLENGED, INC.
990806			BNPED	20000118ADN	ST. GEORGE	UT	CASPER LEARNING FM INCORPORATED
990806	01/18/00	A	BPED	19990809MA	ST. GEORGE	UT	OPEN DOOR CHRISTIAN MINISTRIES
990807			BNPED	20000223AAK	DIAMOND SPRINGS	CA	BROADCASTING FOR THE CHALLENGED, INC.
990807			BNPED	20000303AAI	CAMINO	CA	YOUR CHRISTIAN COMPANION NETWORK, INC.
990807			BNPED	20000303ACU	PLACERVILLE	CA	FAMILY STATIONS, INC.
990807	03/03/00	A	BPED	19990813MB	DIAMOND SPRINGS	CA	CSN INTERNATIONAL
990808	03/03/00	A	BPED	19990813MA	BEACH HAVEN	NJ	COMMUNITY MEDIA SNJ
990808			BNPED	20000223AAL	BEACH HAVEN	NJ	BROADCASTING FOR THE CHALLENGED, INC.
990808			BPED	20000224ABO	MANAHAWKIN	NJ	PENN JERSEY EDUCATIONAL RADIO CORP.
990808			BNPED	20000229AAL	MEDFORD LAKES	NJ	HOPE CHRISTIAN CHURCH OF MARLTON, INC.
990808			BNPED	20000301AAG	BEACHWOOD	NJ	PENSACOLA CHRISTIAN COLLEGE, INC.
990808			BNPED	20000303AAZ	BRIDGATINE	NJ	CSN INTERNATIONAL
990808			BNPED	20000303ABK	TOMS RIVER	NJ	NEW JERSEY PUBLIC BROADCASTING AUTH

990808			BNPED	20000303ACW	SOUTH TOMS RIVER	NJ	JC RADIO, INC.
990809	05/03/00	A	BPED	19990830MA	COOLIDGE	AZ	LIVING PROOF, INC.
990809			BNPED	20000428AAM	COOLIDGE	AZ	BROADCASTING FOR THE CHALLENGED, INC.
990901	01/18/00	A	BPED	19990901MA	MCCONNELLSBURG	PA	MORRIS BROADCASTING & COMMUNICATION
990901			BNPED	20000118AEQ	HAGERSTOWN	MD	FOUR RIVERS COMMUNITY BROADCASTING
990902			BNPED	19991214AAC	ONTARIO	OR	CSN INTERNATIONAL
990902			BNPED	20000209AAE	BAKER	OR	BRIGHT LIGHT BROADCASTING, INC.
990902			BNPED	20000301AAY	LA GRANDE	OR	EDUCATIONAL MEDIA FOUNDATION
990902			BNPED	20000303ABA	NORTH POWDER	OR	CSN INTERNATIONAL
990902	03/03/00	A	BPED	19990903MD	BAKER CITY	OR	OREGON PUBLIC BROADCASTING
990903			BNPED	20000223ABX	LA GRANDE	OR	CASPER LEARNING FM INCORPORATED
990903			BNPED	20000303ABB	UNION	OR	CSN INTERNATIONAL
990903	03/03/00	A	BPED	19990903ME	LA GRANDE	OR	OREGON PUBLIC BROADCASTING
990904			BNPED	19990930AAB	PITTSBURG	TX	MILLENNIUM BROADCASTING CORPORATION
990904			BNPED	20000503AAH	MOUNT PLEASANT	TX	CSN INTERNATIONAL
990904	05/03/00	A	BPED	19990907MG	DANGERFIELD	TX	BILL R. WRIGHT DBA KEGG CHRISTIAN CO
200101			BNPED	20000517AFH	QUINCY	CA	CSN INTERNATIONAL
200101			BNPED	20000518ACL	SPARKS	NV	EDUCATIONAL MEDIA FOUNDATION
200101			BNPED	20000518ACM	SUSANVILLE	CA	BROADCASTING FOR THE CHALLENGED, INC.
200101	05/18/00	A	BNPED	20000119ABU	QUINCY	CA	CALIFORNIA STATE UNIV, SACRAMENTO
200201	05/03/00	A	BNPED	20000217ABA	MARATHON	FL	SCHOOL BOARD OF MIAMI-DADE COUNTY, FL
200201			BNPED	20000428AAN	MARATHON	FL	BROADCASTING FOR THE CHALLENGED, INC.

200201			BNPED	20000503AAG	BIG PINE	FL	TOWER OF PRAISE, INC.
200205			BNPED	20000214AAM	CARNEGIE	OK	CSN INTERNATIONAL
200205			BNPED	20000518ACH	CACHE	OK	EDUCATIONAL MEDIA FOUNDATION
200205	05/18/00	A	BNPED	20000202AAW	CLINTON	OK	CAMERON UNIVERSITY
200401			BPED	19991013AAF	FARMINGTON	NM	YOUR CHRISTIAN COMPANION, INC.
200401			BNPED	20000512AAK	FLORA VISTA	NM	NATIVE AMERICAN CHRISTIAN VOICE
200401	05/18/00	A	BNPED	20000413ABA	PAGOSA SPRINGS	CO	KUTE, INC.