

by shifting Channel 11 from Lawton to Tulsa. In turn, Channel 11 in Lawton can be replaced by shifting Channel 7 from Oklahoma City to Lawton. The assignment of Channel 7 in Lawton and Channel 11 in Tulsa would meet the required minimum assignment separations for Zone II. Accordingly, Channel 4 will be deleted from Tulsa and assigned to Oklahoma City; Channel 11 will be deleted from Lawton and assigned to Tulsa; and Channel 7 will be deleted from Oklahoma City and assigned to Lawton.

Conclusions: Educational Reservation in Tulsa

631. We are of the view that the record supports the basis for reserving a channel in Tulsa for non-commercial educational use in Tulsa. In the Third Notice the Commission proposed that Channel 4 be so reserved. However, as noted above, Channel 4 must be deleted from Tulsa in light of our decision to withdraw the order to show cause to WKY. It was also noted above that VHF Channel 11 is being assigned in Tulsa to replace Channel 4. Accordingly, VHF Channel 11 will be reserved for non-commercial educational use in Tulsa.

Conclusions: Educational Reservation in Oklahoma City and Lawton

632. On the basis of the record the reservations of Channel 13 in Oklahoma City and Channel 28 in Lawton for non-commercial educational use are finalized.

Final Assignments and Reservations

633. The following assignments and reservations are adopted:

City	VHF Channel No.	UHF Channel No.
Oklahoma City, Okla.	4, 9, *13	19, 25
Tulsa, Okla.	2, 6, *11	17, 23
Lawton, Okla.	7	*28, 34

MEMPHIS, TENNESSEE, AND BLYTHEVILLE, ARKANSAS

634. (a) Proposed Assignments and Reservation. In the Third Notice the Commission proposed the following assignments and reservation:

City	VHF Channel No.	UHF Channel No.
Blytheville, Arkansas	3	64
Memphis, Tennessee	5, *10, 13	42, 48

(b) Census Data. The standard metropolitan area of Memphis has a population of 482,000 and the City of Memphis has a population of 396,000. The City of Blytheville has a population of 16,000.

(c) Existing Stations. Memphis Publishing Company is licensed for the operation of Station WMCT at Memphis on Channel 4. The Commission ordered the Memphis Publishing Company to show cause why the license of WMCT should not be modified to specify operation on Channel 5 in lieu of Channel 4. No opposition to the Commission's Show Cause Order was filed by Memphis Publishing Company.

(d) Alternative Counterproposal of Hoyt B. Wooten d/b as WREC Broadcasting Service and WMPS, Inc. WREC Broadcasting Service and WMPS, Inc., requested the additional assignment of a VHF channel to Memphis in two alternative counterproposals. In the first alternative counterproposal it was requested that VHF Channel 3 be deleted from Blytheville and assigned

to Memphis, and that UHF Channels 17 and 23 be assigned to Blytheville in place of Channel 3 as follows:

City	Third Notice		Counterproposal 1	
	VHF Channel No.	UHF Channel No.	VHF Channel No.	UHF Channel No.
Blytheville, Ark	3	64	†	†17, †23, 64
Memphis, Tenn.	5, *10, 13	42, 48	†3, 5, *10, 13	42, 48

(e) Statement in Support of WREC and WMPS Counterproposal 1. WREC and WMPS urged that the size, population and economic importance of Memphis warranted the addition of a VHF channel and that Channel 3 could be assigned to Memphis without violating any of the Commission's standards for minimum separation of co-channel or adjacent channel assignments. It was pointed out that the nearest assignment of Channel 3 would be at Jackson, Mississippi, a distance of 197 miles from Memphis; that more than half the population that would be served by the operation of Channel 3 at Blytheville resides in the State of Tennessee in areas which have no common identity of interest with Blytheville; that Memphis is a vastly more important economic market than Blytheville and that the rural population surrounding Blytheville are more dependent on Memphis than upon Blytheville; and that it was unlikely that the assignment of Channel 3 in Blytheville would result in the operation of that facility with maximum power. Finally, it was asserted that the operation of the UHF channel in Blytheville would be adequate to serve the needs of that community for television service.

(f) Opposition to WREC and WMPS Counterproposal 1. Harold L. Sudbury, Blytheville, Arkansas, supported the assignments proposed by the Commission for Blytheville and opposed the Memphis counterproposal. In the opposition it was stated that Blytheville is situated in a large farming and rural area and would be best served by a lower VHF channel; that because of the rural area, extensive coverage was required in order to reach several hundred thousand persons; that no showing had been made by the Memphis parties of a need for the specific use of Channel 3 at Memphis; and that the assignments proposed by the Commission would result in a fair and equitable distribution of the available frequencies.

(g) Alternative Counterproposal 2 of WREC and WMPS. In alternative counterproposal 2 WREC Broadcasting Service and WMPS, Inc. requested the addition of a VHF channel to Memphis by making the following changes in the Third Notice:

City	Third Notice		Counterproposal 2	
	VHF Channel No.	UHF Channel No.	VHF Channel No.	UHF Channel No.
Blytheville, Ark.	3	64	†13	64
El Dorado, Ark.	10	26	†7	26
Fort Smith, Ark.	5	*16, 22	†11	*16, 22
Hot Springs, Ark.	9	52	†12	52
Jonesboro, Ark.	8	39	†4	39
Little Rock, Ark.	*2, 4, 11	17, 23	†*3, †5, †8	17, 23
Pine Bluff, Ark.	7	36	†10	36
Alexandria, La.	11, 13	43	†8, 13	43
Monroe, La.	8		†4	
Shreveport, La.	3, 12		†2, †11	
State College, Miss.	*2		†*4	
Jackson, Tenn.	9	16	†10	16
Memphis, Tenn.	5, *10, 13	42, 48	†2, †7, †*9, †11	42, 48
Tyler, Texas	7	19	†12	19

The alternative counterproposal of WREC and WMPS would result

in the following co-channel separations in Zone II:

Channel	Cities	Mileage
3	Little Rock, Ark.-Springfield, Mo.	180
8	Little Rock, Ark.-Muskogee, Okla.	188
10	Jackson, Tenn.-Birmingham, Ala.	184

(h) Oppositions and Conflicting Counterproposals to WREC and WMPS Alternative Counterproposal 2. Oppositions and mutually exclusive counterproposals to the alternative counterproposals of WREC Broadcasting Service and WMPS, Inc., were filed by the following parties: Southwestern Publishing Co., Fort Smith, Arkansas; Voice of Longview, Longview, Texas; Memphis Publishing Company, Memphis, Tennessee; WKY Radiophone Co., Oklahoma City, Oklahoma; Harold L. Sudbury, Blytheville, Arkansas; KTOK, Inc., Oklahoma City, Oklahoma; All Oklahoma Broadcasting Co., Tulsa, Oklahoma; and Southwestern Sales Corporation, Tulsa, Oklahoma.

(i) The Memphis Educational Reservation. The Board of Education of the Memphis City Schools, The Memphis Chamber of Commerce, Shelby County Department of Education, Southwestern University and the JCET supported the reservation of VHF Channel 10 in Memphis for use by a non-commercial educational station. The JCET stated that an educational television committee had been formed in Memphis and the Mayor of Memphis had appointed the President of the Board of Education of the Memphis City Schools as its Chairman in April, 1951. The Board of Education of the Memphis City Schools stated that it was using television to some extent in the schools and that the necessary finances would become available in the near future. No objection was filed to the proposed reservation.

Conclusions: Memphis Education Reservation

635. On the basis of the record the reservation of Channel 10 in Memphis for non-commercial educational use is finalized.

Conclusions: Additional Assignment to Memphis

636. It is our view that the record supports the basis for the assignment of a third commercial VHF channel to the Memphis area.

We believe that the size, population and economic importance of the City of Memphis warrant this additional assignment. It has been proposed that this be accomplished by the deletion of VHF Channel 3 from Blytheville, a community of approximately 16,000 persons and the substitution of a UHF channel in that community. In view of the relative size, population and economic importance and resources of the City of Memphis as compared with the City of Blytheville, we believe the record supports the basis for the deletion of Channel 3 from Blytheville and the assignment of that channel to Memphis. The second alternative counterproposal would result in three co-channel separations below the minimum adopted for Zone II and must be denied.

637. WREC and WMPS suggested the assignment of UHF Channels 17 and 23, in addition to Channel 64 proposed for Blytheville in the Third Notice, to Blytheville to replace VHF Channel 3. It is our view, however, that 2 UHF channels are adequate to meet the needs of the Blytheville community. Further, since the assignment of either Channel 17 or 23 would result in a co-channel assignment spacing below the minimum for Zone II we are making UHF Channel 74 available to Blytheville.

638. Accordingly, the first alternative counterproposal of Hoyt B. Wooten d/b as WREC Broadcasting Service and WMPS, Inc. is granted, insofar as it requests the assignment of Channel 3 to Memphis and the second alternative counterproposal is denied.

Conclusions: Show Cause Order

639. An appropriate authorization will be issued to Memphis Publishing Company to specify operation of WMCT on Channel 5.

Final Assignments and Reservation

640. The following assignments and reservation are adopted:

City	VHF Channel No.	UHF Channel No.
Blytheville, Ark.		64, 74
Memphis, Tenn.	3, 5, *10, 13	42, 48

TEMPLE, TEXAS

641. (a) Proposed Assignments. In the Third Notice the Commission proposed the assignment of two channels to Temple: UHF Channels 16 and 22.

(b) Census Data. The population of Temple is 25,000.

(c) Counterproposal of Bell Broadcasting Company. Bell Broadcasting Company, Temple, Texas, requested the additional assignment of Channel 6 to Temple. No other changes in the assignments proposed in the Third Notice were requested.

(d) Statement in Support of Bell Broadcasting Company Counterproposal. Bell Broadcasting Company contended that since the closest cities to Temple having VHF assignments under the Third Notice are Waco, 30 miles to the north, and Austin, 61 miles to the south, Temple would not receive reliable VHF service. It was pointed out that Fort Hood, containing approximately 35,000 military personnel, was located in the western portion of Bell County, 25 miles from Temple and that Temple contains several large private hospitals, in addition to a large veterans hospital. It was also con-