

**Separate Statement  
of  
Commissioner James H. Quello  
  
Dissenting in Part**

**In re:** Applications of Ted Tucker and Jana Tucker, San Manuel,  
Arizona

I support the majority's decision that the application constitutes a major change. As the majority correctly note, the proposed modification would increase the station's coverage area fourfold and would increase the population served 20 times. The proposed facilities would substantially exceed those authorized. Because the application was filed after we imposed our freeze on acceptance of new commercial translators, it is an unacceptable major change subject to the freeze.

I must disagree, however, with the decision to consider a 10% change in a translator's service area as a minor change, per se. Instead, the Commission should examine each proposal to determine whether the change is insubstantial or unavoidable. Such an analysis would be particularly appropriate where a 10% increase in coverage is directed towards areas already served by full service facilities. Given the disposition of the application in this case, there is no need to address the broader policy issues concerning single or multiple transmission lines that serve multiple antennas. Technical questions relating to Section 74.1235 of the rules are better left to our comprehensive examination of translator policies. Notice of Inquiry in MM Docket No. 88-140, Amendment of Part 74 of the Commission's Rules concerning FM Translator Stations, 3 FCC Rcd 3664 (1988). Accordingly, I dissent in part to the Commission's decision.

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