

# M I L L E R & V A N E A T O N

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February 18, 2004

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Re: WT Docket 02-55

Dear Ms. Dortch:

By teleconference yesterday, representatives of the City of San Diego and the County of San Diego, including Sue Levine and Ken Norton for the City and Curt Munro and Richard Whittlesey for the County, met with Jim Schlichting of OET, Michael Wilhelm of WTB and other staff members of the two Bureaus. The undersigned was on the call as counsel for the City and County.

The City and County representatives elaborated upon the attached documents describing their respective discussions with Nextel about frequency exchanges at 800 MHz that might relieve the general shortage of frequencies available to public safety radio should the spectrum realignment proposed by the Consensus Parties be adopted. They also provided details about their systems, including numbers of radios.

FCC staff asked whether financial assistance from Nextel to the San Diego systems had been part of the frequency exchange negotiations. The San Diego representatives said that, through 2001, the topic of financial assistance was under discussion, but since the advent of the Nextel white paper late in that year and the opening of the subsequent rulemaking in Docket 02-55, Nextel had declined to continue negotiations on the subject. The San Diego conferees noted that as members of the Public Safety Improvement Coalition and separately, they had urged the Commission to make sure that Nextel's general offer of funding for the relocation and retuning required by the proposed Consensus Party spectrum realignment was sufficient to complete the task without expense to public safety entities.

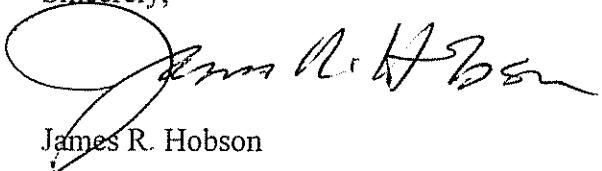
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The San Diego representatives explained that Nextel's promises to deal more explicitly with special Mexican border issues in the relocation of NPSPAC frequencies from 821 to 806 MHz had not been fulfilled, and urged the Commission to do what it could to move the process forward. They asked for conditions on any rulemaking order, if necessary, to resolve the border issues. Even so, they said, the solutions would only be temporary, pending U.S. re-negotiation of bilateral agreements with Mexico.

Finally, the San Diego conferees explained their efforts to identify, despite the proposed spectrum realignment, five national and two State of California "mutual aid" channels that would allow safety agencies in the border region to operate compatibly with colleagues to the north.

Sincerely,



James R. Hobson

cc: Jim Schlichting, Michael Wilhelm

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**Talking Points for Discussion with FCC**

- The Consensus Plan will not work in San Diego. Any solutions developed for resolving interference in the 800 MHz band must include solutions that will work in the border areas.
- The Consensus Plan does not achieve the FCC's objectives as stated for this proceeding:
  1. Interference elimination – there has been no evidence provided that supports any belief that this will result.
  2. Minimal disruption to existing services – all existing services will be severely disrupted and impacted by the proposed Consensus Plan.
  3. Provision of sufficient spectrum for public safety – this will not result in the San Diego area as a result of the proposed Consensus Plan. In order to provide sufficient 800 MHz spectrum for public safety, Nextel would need to vacate their use of 800 MHz in San Diego and provide their spectrum to public safety agencies in the region. Otherwise, San Diego County will experience a net loss of channels (see chart on page 4 of filing dated February 10, 2003).
- As public safety agencies migrate toward newer technology and P25 systems, the architecture is more “cellular-like” and thus, does not “separate” from existing cellular service architecture.
- Public safety should bear no cost as a result of any rulemaking which results from Docket 02-55. Public safety RF systems are solely in place to serve the public and provide critical communications for first responders. They should not take second place to cellular systems that are operated for profit.
- The proposed “San Diego Solution” in the filing dated December 24, 2003 is only a stopgap measure. The bilateral agreement with Mexico needs to be renegotiated to address issues including mutual aid channels, spectrum allocation and usage in the border areas and cross-border interference protections. Permanent solutions must occur from these negotiations.
- Radios purchased with NPSPAC capability should remain NPSPAC capable, whether or not this feature is currently used by an agency.
- What consideration will the licensing for the secondary channels currently held by the County be given? The RCS has been built utilizing these channels to support the public safety agencies using the RCS

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**Nextel Frequency Exchange  
City of San Diego**

Research of the available data provided by Nextel, and additional research of the FCC and PerCon databases is completed. This research looked at the current transmitter licensing of the proposed channel, the adjacent channel above and below, and the  $\frac{1}{2}$  adjacent channels above and below the proposed frequency. Certain changes would need to happen to make the proposed channels acceptable for use by the City of San Diego in their RF systems. Some of these changes may already be happening, but that information was not available.

The following list shows the final set of proposed frequencies. This list was determined after a careful evaluation of the frequencies themselves for possible interference, and how each frequency could be used in the current City RF systems. The desire to continue to use antenna combiners that would not increase the transmitter losses from those currently in operation was also considered. Some thought was also given to the long term use of these channels in future RF system upgrade and redesign. The list below shows the best available channels to accomplish these goals.

This list includes relevant data regarding the proposed replacement channel frequency assignments and all changes required to make the channel usable for the City of San Diego RF systems.

*857.5250- to replace 856.025 Trunk 14 (licensed at multiple sites)*  
AAA vacate 857.5250 in San Diego area

*857.5500- to replace 862.050 Trunk 15 (licensed at multiple sites)*  
Peak Relay & North City Cab vacate 857.5500  
Nextel vacate 857.5625 at Santiago Peak

*857.5750- to replace 863.050 Trunk 17 (licensed at multiple sites)*  
Lone Star and Superior vacate 857.5750  
Nextel vacate 857.6000 in San Diego area  
Nextel vacate 857.5625 & 857.5875 at Santiago

*857.6000- to replace 857.000 Trunk 12 (licensed at multiple sites)*  
Nextel vacate 857.6000 in the San Diego area  
Nextel vacate 857.5875 at Santiago  
Mobile Relay Associates vacate 857.6125 at Elsinore

*858.2750- to replace 861.100 MDT SYV (licensed SYV & countywide mobiles and temp bases)*  
Peak Relay vacate 858.2750  
Nextel vacate 858.3000 in San Diego area

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858.5250- *to replace 857.025 Trunk 11 (licensed at multiple sites)*

Nextel vacate 858.5000, 858.5250, and 858.5500 in the San Diego area

858.5500- *to replace 857.050 Trunk 7 (licensed at multiple sites)*

Nextel vacate 858.5250, and 858.5500 in the San Diego area

Nextel vacate 858.5625 at Santiago

858.5750- *to replace 857.075 MDT ENC (licensed at multiple sites)*

Motient vacate 858.5750

Nextel vacate 858.5500 and 858.6000 in the San Diego area

Nextel vacate 858.5625 and 858.5875 at Santiago

858.9000- *to replace 856.075 MDT CAB (licensed at multiple sites)*

Nextel vacate 858.9000 and 858.925 in San Diego area.

859.3500- *to replace 861.050 MDT NCS (licensed NCS & countywide mobiles and temp bases)*

Nextel vacate 859.3500 in the San Diego area

Nextel vacate 859.3625 at Santiago Peak

859.5250- *to replace 864.050 Trunk 18 (licensed at WDN and countywide mobiles and temp bases)*

Nextel vacate 859.5250 and 859.550 in the San Diego area

859.5500- *to replace 856.050 Trunk 13 (licensed at multiple sites)*

Nextel vacate 859.5250 and 859.550 in the San Diego area

Nextel vacate 859.5625 at Santiago

859.5750- *to replace 865.050 Trunk 19 (licensed at WDN and countywide mobiles and temp bases)*

Superior Ready Mix vacate 859.5750

Nextel vacate 859.5500 & 859.6000 in San Diego area

Nextel vacate 859.5625 & 859.5875 at Santiago

859.6250- *to replace 862.100 Trunk 16 (licensed at multiple sites)*

Peak Relay, North City Cab, and Evergreen vacate 859.6250

Nextel vacate 859.600 and 859.6500 in San Diego area

Nextel vacate 859.6375 at Santiago Peak

Mobile Relay Assoc vacate 859.6125 at Elsinore

859.8250- *to replace 864.100 Conv Dir (licensed at WDN and countywide mobiles and temp bases)*

Nextel vacate 859.8000, 859.8250, and 859.8500 in San Diego area

859.9250- *to replace 865.100 Conv Dir & STP (licensed at WDN and countywide mobiles and bases)*

Nextel vacate 859.9000, 859.9250, 859.9500 in the San Diego area

LA City at Palos Verdes 859.9375 would need to limit ERP in our direction

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860.1500- *to replace 863.100 Palomar & STP (licensed at Palomar & countywide mobiles and bases)*

SD Gas&Elec vacate 860.1500 at all sites

Nextel vacate 860.1375 and 860.1625 at Santiago Peak

Other channels considered in this process.....

858.8000-

Nextel vacate 858.7500, 858.8000, and 858.8250 in the San Diego area

FedEx at Palos Verdes 858.8125 would need to limit ERP in our direction

857.7750-

Nextel vacate 857.7500, 857.7750, 857.8000 in the San Diego area

LA City at Palos Verdes 857.7625 would need to limit ERP in our direction

Radio Comm vacate 857.7875 at Santiago Peak

858.7750-

Nextel vacate 858.7500, 858.775, and 858.8000 in the San Diego area

LA City at Palos Verdes 858.7625 would need to limit ERP in our direction

858.8500-

Nextel vacate 858.8250, 858.8500, and 858.8750 in the San Diego area

FedEx vacate 858.8625 at Santiago Peak

859.3750-

Nextel vacate 859.3500 and 859.4000 in San Diego area

Nextel vacate 859.3625 at Santiago

Fed Ex vacate 859.3750 in San Diego area

857.8750-

Nextel vacate 857.8500, 857.8750, and 857.9000 in San Diego area

Southern California vacate 857.8875 at Elsinore Peak

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Proposed Frequency Exchange- January 2004

Current use	Current freq	Final freq	notes
TK 14	856.0250	857.5250	ASI
TK 15	862.0500	857.5500	possible new tkn 2 cntl chan
TK 17	863.0500	857.5750	possible new tkn 1 cntl chan
TK 12	857.0000	857.6000	
TK 10	858.0000	858.0000	no change
TK 6	858.0250	858.0250	no change
TK 5	858.0500	858.0500	no change
MDT SOL	858.0750	858.0750	no change
MDT SYV	861.1000	858.2750	
TK 11	857.0250	858.5250	
TK 7	857.0500	858.5500	
MDT ENC	857.0750	858.5750	swap freq with CWL MDT
MDT CAB	856.0750	858.9000	
TK 9	859.0000	859.0000	no change
TK 4	859.0250	859.0250	no change
TK 3	859.0500	859.0500	no change
MDT BLK	859.0750	859.0750	no change
STP/PD PORT rptr	859.2250	859.2250	no change
MDT NCS	861.0500	859.3500	
TK 18	864.0500	859.5250	
TK 13	856.0500	859.5500	
TK 19	865.0500	859.5750	
TK 16	862.1000	859.6250	
SWAT DIR	864.1000	859.8250	
WATER DIR	865.1000	859.9250	
TK 8	860.0000	860.0000	no change
TK 2	860.0250	860.0250	possible swap to make tkn 15
TK 1	860.0500	860.0500	possible swap to make tkn 17
MDT CWL	860.0750	860.0750	swap freq with ENC MDT
PALOMAR	863.1000	860.1500	

move control chans to lowest freqs for intermod protection- swap tkn 1&2 with new 15&17?

Cowles MDT freq must be able to go into two combiners due to lack of antenna mount- swap ENC with CWL?

All trunk sites would need four combiners/antennas vice three existing

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**City of San Diego Radio Counts**

Number of Radios that are Primary Users of City System = 8850

Number of Mutual Aid Radios on City System = 10,000

Total number of Radios on City System = 18,850

**County of San Diego Radio Counts**

Radio Count of Primary Users 13641

Radio Count of Mutual Aid Users 3623

Total Number of Radios on RCS 17264

Total Mobile Data Radio Count 562

**Proposed Nextel Frequency Exchange**  
**February 12, 2004**

The County of San Diego received on August 22, 2003 a proposed frequency exchange document showing possible channels that could be utilized in a frequency exchange between the County and Nextel. The County compared the information with current licensing information and found it to be correct with the exception of ongoing sites' additions and changes going on in our system but we feel these minor changes can be addressed by Nextel when the plan is finalized.

We feel the plan will work only if Nextel is able to clear the channels of co-and- adjacent user that would interfere in our area of operation.

The attached list supplied by Nextel shows detailed information with existing and proposed replacement frequencies. This list does not show all channels licensed by the County of San Diego but only those channels impacted by the Consensus Plan move non NSPAC. Additional channels licensed not on list:

28 Channels licensed under Radio Service Code YP or GP  
95 Channels licensed under Radio Service Code YF or GF NPSPAC

The proposed NPSPAC plan move does not address the problem of National and State Mutual Aid channels along the Border area of South California under the Consensus plan. NPSPAC users north of the treaty line would be assigned channels between 851.000 -854.000 MHz while users south of the line assigned channels between 856.0125-857.4375 MHz. The plan as now proposed would eliminate common mutual aid channels for fire and police agencies responding to mutual aid incidents above and below the treaty line during time of need. We ask that the Commission adopt a plan that keeps all Public Safety users on the same frequencies. This can only happen if an agreement with Mexico is put in place to utilize the same homeland channels along the border.

callsign	location city	location state	lat degrees	lat minutes	lat seconds	long degrees	long minutes	long seconds	frequency assigned	Replacement Freq
WPJR303	BRAWLEY	CA	33	0	26.2	115	31	37	8560750	8575250
WPJR303	CALEXICO	CA	32	41	29.2	115	29	47	8560750	8575250
WPJR303	IMPERIAL	CA	32	49	10.2	115	30	43	8560750	8575250
WPJR303	CALIPATRIA	CA	33	7	33.1	115	31	7	8560750	8575250
										4
WPJR652	CAMPO	CA	32	36	2.2	116	36	34	8561250	8576500
WPKA531	SAN YSIDRO	CA	32	33	42.2	117	2	7.1	8561250	8576500
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WPJR304	YUMA	AZ	32	40	20.2	114	20	9.8	8561750	8581500
WPJS224	RAINBOW	CA	33	24	1.1	117	11	27	8561750	8581500
WPJS225	POWAY	CA	32	58	53.2	117	6	59	8561750	8581500
WPJS226	VISTA	CA	33	12	53.1	117	11	18	8561750	8581500
WPJS227	POWAY	CA	33	0	33	116	58	17	8561750	8581500
WPJS228	SAND MARCOS	CA	33	6	40.1	117	12	8.1	8561750	8581500
WPJS229	SAN DIEGO	CA	32	50	23.2	117	15	9.1	8561750	8581500
WPJT680	CARLSBAD	CA	33	8	12.1	117	20	14	8561750	8581500
WPKB641	JACUMBA	CA	32	37	59.2	116	6	6.1	8561750	8581500
WPWL746	Escondido	CA	33	9	9	117	4	42	8561750	8581500
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8561750	8581500
										11
	PALO VERDE	CA	33	3	16.1	114	49	40	8562000	8597000
WPJS224	RAINBOW	CA	33	24	1.1	117	11	27	8562000	8597000
WPJS225	POWAY	CA	32	58	53.2	117	6	59	8562000	8597000
WPJS226	VISTA	CA	33	12	53.1	117	11	18	8562000	8597000
WPJS227	POWAY	CA	33	0	33	116	58	17	8562000	8597000
WPJS228	SAND MARCOS	CA	33	6	40.1	117	12	8.1	8562000	8597000
WPJS229	SAN DIEGO	CA	32	50	23.2	117	15	9.1	8562000	8597000
WPJS230	CAMPO	CA	32	36	4.2	116	28	39	8562000	8597000
WPJT680	CARLSBAD	CA	33	8	12.1	117	20	14	8562000	8597000
WPWL746	Escondido	CA	33	9	9	117	4	42	8562000	8597000
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8562000	8597000
										11
	SALTON CITY	CA	33	16	47.1	115	59	13	8562250	8576250
										1
WPKF897	BOULEVARD	CA	32	38	53.2	116	19	2.1	8562500	8588250
WPKF897	POWAY	CA	33	0	33.2	116	58	20	8562500	8588250
										2
WPGV548	BRAWLEY	CA	32	57	29.2	115	50	23	8564250	8577000
WPJR304	SALTON CITY	CA	33	16	47.1	115	59	13	8564250	8577000

WPJR303	CALEXICO	CA	32	41	29.2	115	29	47	8570750	8584750
WPJR303	IMPERIAL	CA	32	49	10.2	115	30	43	8570750	8584750
WPJR303	BRAWLEY	CA	33	0	26.2	115	31	37	8570750	8584750
WPJR303	CALIPATRIA	CA	33	7	33.1	115	31	7	8570750	8584750
										4
WPKK673	JAMUL	CA	32	42	9.2	116	45	50	8571000	8583000
WPKK673	PAUMA VALLEY	CA	33	18	27.1	116	51	17	8571000	8583000
										2
WPJS224	RAINBOW	CA	33	24	1.1	117	11	27	8571750	8609250
WPJS225	POWAY	CA	32	58	53.2	117	6	59	8571750	8609250
WPJS226	VISTA	CA	33	12	53.1	117	11	18	8571750	8609250
WPJS227	POWAY	CA	33	0	33	116	58	17	8571750	8609250
	SAND									
WPJS228	MARCOS	CA	33	6	40.1	117	12	8.1	8571750	8609250
WPJS229	SAN DIEGO	CA	32	50	23.2	117	15	9.1	8571750	8609250
WPJT680	CARLSBAD	CA	33	8	12.1	117	20	14	8571750	8609250
WPKB641	JACUMBA	CA	32	37	59.2	116	6	6.1	8571750	8609250
WPWL746	Escondido	CA	33	9	9	117	4	42	8571750	8609250
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8571750	8609250
										10
	PALO									
WPJR304	VERDE	CA	33	3	16.1	114	49	40	8572000	8601750
WPJR652	CAMPO	CA	32	36	2.2	116	36	34	8572000	8601750
WPJS224	RAINBOW	CA	33	24	1.1	117	11	27	8572000	8601750
WPJS225	POWAY	CA	32	58	53.2	117	6	59	8572000	8601750
WPJS226	VISTA	CA	33	12	53.1	117	11	18	8572000	8601750
WPJS227	POWAY	CA	33	0	33	116	58	17	8572000	8601750
	SAND									
WPJS228	MARCOS	CA	33	6	40.1	117	12	8.1	8572000	8601750
WPJS229	SAN DIEGO	CA	32	50	23.2	117	15	9.1	8572000	8601750
WPJT680	CARLSBAD	CA	33	8	12.1	117	20	14	8572000	8601750
WPWL746	Escondido	CA	33	9	9	117	4	42	8572000	8601750
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8572000	8601750
										11
	SALTON									
WPJR304	CITY	CA	33	16	47.1	115	59	13	8572250	8585750
										1
	MOUNT									
WPKF897	LAGUNA	CA	32	53	32.2	116	25	15	8572500	8595250
WPKF897	FALLBROOK	CA	33	27	35.1	117	20	21	8572500	8595250
WPKF897	CAMPO	CA	32	36	4.2	116	28	39	8572500	8595250
WPKF897	POWAY	CA	32	58	53.2	117	6	59	8572500	8595250
										4
WPJS227	POWAY	CA	33	0	33	116	58	17	8610000	8579250
	SAND									
WPJS228	MARCOS	CA	33	6	40.1	117	12	8.1	8610000	8579250

WPTP345	Poway	CA	32	58	53.2	117	6	59	8610000	8579250
WPTP345	San Marcos	CA	33	6	40.1	117	12	8.1	8610000	8579250
WPTP345	San Diego	CA	32	50	23.2	117	15	9.1	8610000	8579250
WPTP345	Poway	CA	33	0	33.2	116	58	17	8610000	8579250
WPTP507	Vista	CA	33	12	55	117	11	18	8610000	8579250
WPTP507	Rainbow	CA	33	24	10	117	11	24	8610000	8579250
WPTP507	Carlsbad	CA	33	8	12	117	20	11	8610000	8579250
WPWL746	Escondido	CA	33	9	9	117	4	42	8610000	8579250
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8610000	8579250
									11	
	PALO VERDE	CA	33	25	53.1	114	43	58	8610500	8575000
									1	
	PALO VERDE	CA	33	25	53.1	114	43	58	8611000	8577500
									1	
WPJS224	RAINBOW	CA	33	24	1.1	117	11	27	8611500	8576750
WPJS225	POWAY	CA	32	58	53.2	117	6	59	8611500	8576750
WPJS226	VISTA	CA	33	12	53.1	117	11	18	8611500	8576750
WPJS227	POWAY	CA	33	0	33	116	58	17	8611500	8576750
	SAND MARCOS	CA	33	6	40.1	117	12	8.1	8611500	8576750
WPJS228	SAN DIEGO	CA	32	50	23.2	117	15	9.1	8611500	8576750
WPJT454	BOULEVARD	CA	32	38	53.2	116	19	2.1	8611500	8576750
WPJT680	CARLSBAD	CA	33	8	12.1	117	20	14	8611500	8576750
WPWL746	Escondido	CA	33	9	9	117	4	42	8611500	8576750
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8611500	8576750
									10	
WPJS224	RAINBOW	CA	33	24	1.1	117	11	27	8612000	8585500
WPJS225	POWAY	CA	32	58	53.2	117	6	59	8612000	8585500
WPJS226	VISTA	CA	33	12	53.1	117	11	18	8612000	8585500
WPJS227	POWAY	CA	33	0	33	116	58	17	8612000	8585500
	SAND MARCOS	CA	33	6	40.1	117	12	8.1	8612000	8585500
WPJS228	SAN DIEGO	CA	32	50	23.2	117	15	9.1	8612000	8585500
WPJT680	CARLSBAD	CA	33	8	12.1	117	20	14	8612000	8585500
WPKB641	JACUMBA	CA	32	37	59.2	116	6	6.1	8612000	8585500
WPWL746	Escondido	CA	33	9	9	117	4	42	8612000	8585500
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8612000	8585500
									10	
WPGV548	BRAWLEY	CA	32	57	29.2	115	50	23	8612500	8579500
									1	
WNBY342	SAN DIEGO	CA	32	41	47.2	116	56	9.1	8615000	8586250
WPJS227	POWAY	CA	33	0	33	116	58	17	8615000	8586250
	SAND MARCOS	CA	33	6	40.1	117	12	8.1	8615000	8586250
WPTP345	San Marcos	CA	33	6	40.1	117	12	8.1	8615000	8586250

WPTP345	San Diego	CA	32	50	23.2	117	15	9.1	8615000	8586250
WPTP345	Poway	CA	33	0	33.2	116	58	17	8615000	8586250
WPTP345	Poway	CA	32	58	53.2	117	6	59	8615000	8586250
WPTP507	Vista	CA	33	12	55	117	11	18	8615000	8586250
WPTP507	Rainbow	CA	33	24	10	117	11	24	8615000	8586250
WPTP507	Carlsbad	CA	33	8	12	117	20	11	8615000	8586250
WPWL746	Escondido	CA	33	9	9	117	4	42	8615000	8586250
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8615000	8586250
									12	
WPMT497	DESCANSO	CA	33	0	24.2	116	35	10	8620000	8587500
									1	
	PALO VERDE	CA	33	25	53.1	114	43	58	8620500	8578750
WPJR304									1	
WPJS224	RAINBOW	CA	33	24	1.1	117	11	27	8621500	8586750
WPJS225	POWAY	CA	32	58	53.2	117	6	59	8621500	8586750
WPJS226	VISTA	CA	33	12	53.1	117	11	18	8621500	8586750
WPJS227	POWAY	CA	33	0	33	116	58	17	8621500	8586750
	SAND									
WPJS228	MARCOS	CA	33	6	40.1	117	12	8.1	8621500	8586750
WPJS229	SAN DIEGO	CA	32	50	23.2	117	15	9.1	8621500	8586750
WPJT454	BOULEVARD	CA	32	38	53.2	116	19	2.1	8621500	8586750
WPJT680	CARLSBAD	CA	33	8	12.1	117	20	14	8621500	8586750
WPWL746	Escondido	CA	33	9	9	117	4	42	8621500	8586750
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8621500	8586750
									10	
WPJS224	RAINBOW	CA	33	24	1.1	117	11	27	8622000	8586500
WPJS225	POWAY	CA	32	58	53.2	117	6	59	8622000	8586500
WPJS226	VISTA	CA	33	12	53.1	117	11	18	8622000	8586500
WPJS227	POWAY	CA	33	0	33	116	58	17	8622000	8586500
	SAND									
WPJS228	MARCOS	CA	33	6	40.1	117	12	8.1	8622000	8586500
WPJS229	SAN DIEGO	CA	32	50	23.2	117	15	9.1	8622000	8586500
WPJS230	CAMPO	CA	32	36	4.2	116	28	39	8622000	8586500
WPJT680	CARLSBAD	CA	33	8	12.1	117	20	14	8622000	8586500
WPWL746	Escondido	CA	33	9	9	117	4	42	8622000	8586500
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8622000	8586500
									10	
WPGV548	BRAWLEY	CA	32	57	29.2	115	50	23	8622500	8587000
									1	
WPJR652	CAMPO	CA	32	36	2.2	116	36	34	8630000	8586000
WPJS227	POWAY	CA	33	0	33	116	58	17	8630000	8586000
	SAND									
WPJS228	MARCOS	CA	33	6	40.1	117	12	8.1	8630000	8586000
WPTP345	Poway	CA	32	58	53.2	117	6	59	8630000	8586000
WPTP345	Poway	CA	33	0	33.2	116	58	17	8630000	8586000
WPTP345	San Marcos	CA	33	6	40.1	117	12	8.1	8630000	8586000

WPTP345	San Diego	CA	32	50	23.2	117	15	9.1	8630000	8586000
WPTP507	Carlsbad	CA	33	8	12	117	20	11	8630000	8586000
WPTP507	Rainbow	CA	33	24	10	117	11	24	8630000	8586000
WPTP507	Vista	CA	33	12	55	117	11	18	8630000	8586000
WPUX912	Campo	CA	32	36	2.2	116	36	34	8630000	8586000
WPWL746	Escondido	CA	33	9	9	117	4	42	8630000	8586000
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8630000	8586000
								13		
WPJR303	CALEXICO	CA	32	41	29.2	115	29	47	8631000	8594750
WPJR303	IMPERIAL	CA	32	49	10.2	115	30	43	8631000	8594750
WPJR303	CALIPATRIA	CA	33	7	33.1	115	31	7	8631000	8594750
WPJR303	BRAWLEY	CA	33	0	26.2	115	31	37	8631000	8594750
								4		
WPJS224	RAINBOW	CA	33	24	1.1	117	11	27	8631500	8596750
WPJS225	POWAY	CA	32	58	53.2	117	6	59	8631500	8596750
WPJS226	VISTA	CA	33	12	53.1	117	11	18	8631500	8596750
WPJS227	POWAY	CA	33	0	33	116	58	17	8631500	8596750
	SAND									
WPJS228	MARCOS	CA	33	6	40.1	117	12	8.1	8631500	8596750
WPJS229	SAN DIEGO	CA	32	50	23.2	117	15	9.1	8631500	8596750
WPJS230	CAMPO	CA	32	36	4.2	116	28	39	8631500	8596750
WPJT680	CARLSBAD	CA	33	8	12.1	117	20	14	8631500	8596750
WPWL746	Escondido	CA	33	9	9	117	4	42	8631500	8596750
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8631500	8596750
								10		
WPKK671	SAN ONOFRE	CA	33	21	16.1	117	31	27	8632000	8585250
								1		
WPGV548	BRAWLEY	CA	32	57	29.2	115	50	23	8632500	8578500
WPJS227	POWAY	CA	33	0	33	116	58	17	8632500	8606250
	SAND									
WPJS228	MARCOS	CA	33	6	40.1	117	12	8.1	8632500	8606250
WPTP345	San Diego	CA	32	50	23.2	117	15	9.1	8632500	8606250
WPTP345	San Marcos	CA	33	6	40.1	117	12	8.1	8632500	8606250
WPTP345	Poway	CA	33	0	33.2	116	58	17	8632500	8606250
WPTP345	Poway	CA	32	58	53.2	117	6	59	8632500	8606250
WPTP507	Rainbow	CA	33	24	10	117	11	24	8632500	8606250
WPTP507	Carlsbad	CA	33	8	12	117	20	11	8632500	8606250
WPTP507	Vista	CA	33	12	55	117	11	18	8632500	8606250
WPWL746	Escondido	CA	33	9	9	117	4	42	8632500	8606250
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8632500	8606250
								12		
WNSF262	OCEANSIDE	CA	33	11	44.1	117	20	32	8641500	8583750
WNSF262	OCEANSIDE	CA	33	12	6.1	117	21	53	8641500	8583750
								2		
WPKK671	SAN ONOFRE	CA	33	21	16.1	117	31	27	8642000	8595500

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WPJR303	CALEXICO	CA	32	41	29.2	115	29	47	8642500		8576000
WPJR303	BRAWLEY	CA	33	0	26.2	115	31	37	8642500		8576000
WPJR303	IMPERIAL	CA	32	49	10.2	115	30	43	8642500		8576000
WPJR303	CALIPATRIA	CA	33	7	33.1	115	31	7	8642500		8576000
WPJS227	POWAY	CA	33	0	33	116	58	17	8642500		8576000
	SAND										
WPJS228	MARCOS	CA	33	6	40.1	117	12	8.1	8642500		8576000
WPTP345	Poway	CA	32	58	53.2	117	6	59	8642500		8576000
WPTP345	San Marcos	CA	33	6	40.1	117	12	8.1	8642500		8576000
WPTP345	Poway	CA	33	0	33.2	116	58	17	8642500		8576000
WPTP345	San Diego	CA	32	50	23.2	117	15	9.1	8642500		8576000
WPTP507	Carlsbad	CA	33	8	12	117	20	11	8642500		8576000
WPTP507	Rainbow	CA	33	24	10	117	11	24	8642500		8576000
WPTP507	Vista	CA	33	12	55	117	11	18	8642500		8576000
WPWL746	Escondido	CA	33	9	9	117	4	42	8642500		8576000
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8642500		8576000
											15
WPJS227	POWAY	CA	33	0	33	116	58	17	8650000		8589250
	SAND										
WPJS228	MARCOS	CA	33	6	40.1	117	12	8.1	8650000		8589250
WPTP345	San Diego	CA	32	50	23.2	117	15	9.1	8650000		8589250
WPTP345	Poway	CA	32	58	53.2	117	6	59	8650000		8589250
WPTP345	Poway	CA	33	0	33.2	116	58	17	8650000		8589250
WPTP345	San Marcos	CA	33	6	40.1	117	12	8.1	8650000		8589250
WPTP507	Carlsbad	CA	33	8	12	117	20	11	8650000		8589250
WPTP507	Rainbow	CA	33	24	10	117	11	24	8650000		8589250
WPTP507	Vista	CA	33	12	55	117	11	18	8650000		8589250
WPWL746	Escondido	CA	33	9	9	117	4	42	8650000		8589250
WPWL747	Oceanside	CA	33	13	31.1	117	21	59	8650000		8589250
											11
WPLW597	DESCANSO	CA	32	56	49.2	116	36	24	8651500		8598000
											1
	SAN										
WPKK671	ONOFRE	CA	33	21	16.1	117	31	27	8652000		8596500
											1
WPJR303	BRAWLEY	CA	33	0	26.2	115	31	37	8652500		8604750
WPJR303	CALEXICO	CA	32	41	29.2	115	29	47	8652500		8604750
WPJR303	IMPERIAL	CA	32	49	10.2	115	30	43	8652500		8604750
WPJR303	CALIPATRIA	CA	33	7	33.1	115	31	7	8652500		8604750