

COMPLAINTS

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FM DIVISION

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

JUN 27 1991

In the matter of

FCC MAIL ROOM

MM Docket No. _____

RM - _____

An application by Alderete Communications
for a new FM booster station to operate
on Channel 263, 100 MHz at Laredo, Webb
County, Texas

PROTEST TO APPLICATION FOR A NEW
FM BOOSTER STATION

NOW COMES Paul Garza, Jr., holder of Construction Permit for
Channel 291A (106.1 MHz) FM in Laredo, Webb County, Texas
complaining of Alderete Communications KZZQ (FM) Channel 263 C2
Mirando City and requests the denial of Alderete Communication's
application for an FM Booster for Laredo, Texas.

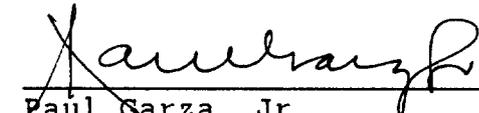
Applicant, Alderete Communications, has entered into
construction of the afore mentioned applied FM booster prior to
Commission approval.

Applicant, through and/or along with her husband Bruce
Earle, aka Bruce Miller Earle, aka Bruce Miller, now apply for a
booster station in Laredo, Texas beginning construction prior to
authorization and while not constructing in Mirando KZZQ Channel
263 raises the obvious questions of a preexisting intent to enter
the Laredo Market with no regard to the market of license
Mirando, Webb County.

It is additionally believed that the application, if
granted, would be an unfair and unreasonable market encroachment.
Applicant had every opportunity to file during every available
filing window, Channel 291A afforded. Applicant however, chose
not to compete fairly for an assignment in Laredo and therefore
should not now be granted through a secondary "back door"
allocation.

RELIEF SOUGHT: That this filing be accepted and not void for want of form. That the Federal Communication Commission rule that public purposes will not be best served in the granting of the application requested. That the application for a booster FM for Laredo, Texas be denied. **AND** that an investigation on behalf of the citizens of Mirando, a Webb County Subdivision, Laredo, an Incorporated Municipality and the Federal Communications Commission be commenced to ascertain the true and factual intent of the applicant/KZZQ, **AND** to verify the accuracy in fact or by law of its (Alderete Communications) past and present filings.

Respectfully submitted,



Paul Garza, Jr.,
Channel 291A

PAUL GARZA & ASSOCIATES
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June 25, 1991