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February 19, 1992

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

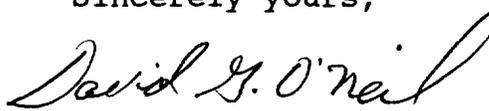
Re: MM Docket No. 92-10
Comments of Ruth Communications
Corporation

Dear Ms. Searcy:

Ruth Communications Corporation, permittee of WRWX(FM), Sanibel, Florida, hereby files an original and four copies of its comments in the aforementioned proceeding.

Please direct any questions concerning this matter to the undersigned.

Sincerely yours,


David G. O'Neil

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Enclosures

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List A B C D E

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

In the Matter of

Amendment of Section 73.202(b))	MM Docket No. 92-10
Table of Allotments)	RM-7865
FM Broadcast Stations)	
(Sanibel and San Carlos)	
Park, Florida))	

To: Chief, Allocations Branch

COMMENTS OF RUTH COMMUNICATIONS CORPORATION

Ruth Communications Corporation ("Ruth") hereby submits its comments to the Notice of Proposed Rule Making, DA 92-43 (Assistant Chief, Allocations Branch) (released January 28, 1992) ("NPRM").¹ The NPRM proposes to amend the FM table of allotments and to modify the permit for WRWX(FM) to operate on Channel 253A at San Carlos Park. Ruth supports this proposal to enable WRWX(FM) to be able finally to construct its facilities and provide service to the public. In support thereof, the following is hereby shown:

1. Ruth is the permittee of WRWX(FM), Sanibel Florida. Ruth hereby incorporates by reference its petition for rule making filed on October 22, 1991, which led to the NPRM. The petition describes in detail Ruth's diligent efforts over the past eight and one-half years to construct and operate WRWX(FM) on Channel 253A at Sanibel, Florida and why concerns of federal, state, and local authorities have made it impossible for Ruth to operate WRWX(FM) at Sanibel. The only

¹ The NPRM authorized the filing of comments by March 20, 1992. NPRM at ¶10. Thus, Ruth's comments are timely filed.

alternative is for Ruth to operate on Channel 253A at San Carlos Park. Changing the community of license of WRWX(FM) accordingly will permit Ruth to provide first local service to San Carlos Park in lieu of no service to Sanibel.

2. In the event the Commission amends the FM Table of Allotments, as proposed, and modifies the permit of WRWX(FM) for operation on Channel 253A at San Carlos Park, Florida, Ruth will apply for and construct WRWX(FM) on Channel 253A at San Carlos Park, Florida in a prompt manner.

3. Because of Ruth's diligent efforts over the last eight and one-half years to construct WRWX(FM), Ruth requests that the Commission expedite consideration of the comments filed in this proceeding and act on the proposal as soon as possible.

WHEREFORE, for the foregoing reasons, Ruth Communications Corporation supports the Commission's proposal to amend the FM Table of Allotments to modify the permit of WRWX(FM) to operate on Channel 253A at San Carlos Park, Florida, and urges that it be adopted as soon as possible.

Respectfully submitted,

RUTH COMMUNICATIONS CORPORATION



Theodore D. Kramer, Esq.
David G. O'Neil, Esq.

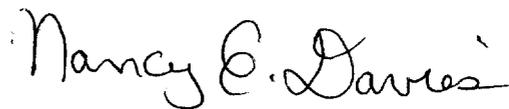
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February 19, 1992

Its Attorneys

CERTIFICATE OF SERVICE

I, Nancy E. Davies, a secretary in the law offices of Haley, Bader & Potts, hereby certify that I have on this 19th day of February, 1992, sent copies of the foregoing "COMMENTS OF RUTH COMMUNICATIONS CORPORATION" by first-class United States Mail, postage prepaid, to the following:

*Andrew J. Rhodes, Esq.
Chief, Allocations Branch
Policy & Rules Division
Federal Communications Commission
2025 M Street, N.W.
Room 8322
Washington, D.C. 20554



Nancy E. Davies

*Hand Delivered