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MAR 31 1992

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

Federal Communications Commission
Office of the Secretary

In the Matter of

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Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations)
(Stock Island, Florida))

MM Docket No. 92-188)
RM-7713)
MAR 31 1992

FCC MAIL BRANCH

To: Chief Allocations Branch
Mass Media Bureau

Reply Comments of
S-3 Communications Inc.

1. S-3 Communications, Inc. ("S-3) replies to the comments filed in this proceeding by Key West Communications, Inc. ("WOZN"). Therein WOZN claims that Stock Island, Florida is "not a politically independent community" and that the Stock Island allotment should not be made because the Key West radio market is over-radioed.

2. Stock Island is a community for channel allotment purposes. As explained in the attached letter from Paul Galloway, Chief of the Stock Island Volunteer Fire Department, the community is located in unincorporated Monroe County (not Key West) and is an entity, in itself, with over two thousand residential units. The Stock Island Volunteer Fire Department has been in existence for thirteen years. The Stock Island Businessman's Association has been serving island businesses for more than thirty years. The Stock Island Mobile Home Owners Association represents local mobile home residents. The Stock Island Neighborhood Improvement Program is now in progress, aimed at improving all facets of the community.

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3. WOZN's complains that the Key West Market is over-radioed and that another radio station is not warranted. This is not, however, a factor considered in Commission allotment or licensing proceedings. The Berwick issue was abolished years ago. Moreover, failure to allot Channel 248A to Stock Island, Florida will not free the channel for use elsewhere. There is simply no place to utilize the channel outside of the Stock Island area. Keeping Channel 248A forever silent would be manifestly inconsistent with the efficiency requirements of 47 USC §307(b).

Respectfully Submitted,



Joseph A. Belisle
Counsel for S-3 Communications, Inc.
One S.E. Third Avenue
Suite 1450
Miami, FL 33131
(305) 530-1322

March 30, 1992

CERTIFICATE OF SERVICE

I, Maria D. Riveron, hereby certify that the attached Reply Comments submitted on behalf of S-3 Communications, Inc. was sent this 30th day of March, 1992 to the following person by U.S. mail, first class postage prepaid:

Donald E. Ward, Esq.
P.O. Box 286
Washington, DC 20044-0286
Counsel for
Key West Communications, Inc.

Maria D. Riveron

Maria D. Riveron

STOCK ISLAND VOL. FIRE DEPT., INC.
Maloney Ave. & 2nd Street, S. I.
Key West, Florida 33040

March 25, 1992

Leibowitz and Spencer
Suite 1450
Amerifirst Building
One Southeast Third Avenue
Miami, Fl 33131-1715

RE: Mr. Stewart Garrison
S-3 Communications Corp. (248A)
3840 North Roosevelt Blvd.
Key West, Fl 33040

This letter should help to substantiate that the community of Stock Island, Florida does exist and is a viable community. This community is located in the Florida Keys at the south end of the unincorporated section of Monroe County. This community is an entity in itself with over two (2) thousand residential units in the area. There are numerous commercial and industrial businesses, many of which have moved out of the city of Key West. Many of them retain part of their names (Key West) for business and financial reasons. IE: The City Electric System, owned by the city of Key West, is consolidating it's primary power generating and maintenance facilities on Stock Island.

The Stock Island Volunteer Fire Department, Inc. has been providing the fire service for more than thirteen (13) years. Prior to that the Key West City Fire Department provided the fire service to this community. The Stock Island Businessmen's Association has been in existence for more than thirty (30) years, coordinating business activities in the community. The Stock Island Mobil Home Owner's Association represents the mobil home park residents in the area. The Stock Island Neighborhood Improvement Program now in progress is incorporating all facets of the community, residents, police, radio, county, fire, church, business, marina, and etc.

The Stock Island community needs an additional radio station with community programming.

Sincerely:


Paul Galloway, Fire Chief