

**ORIGINAL  
RECEIVED**

**BARAFF, KOERNER, OLENDER & HOCHBERG, P. C.**

ATTORNEYS AT LAW  
5335 WISCONSIN AVENUE, N. W., SUITE 300  
WASHINGTON, D. C. 20015-2003

**JUN 27 1991**

(202) 686-3200

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY  
OF COUNSEL

B. JAY BARAFF  
ROBERT L. OLENDER  
JAMES A. KOERNER  
PHILIP R. HOCHBERG  
AARON P. SHAINIS  
LEE J. PELTZMAN  
ALAN E. ARONOWITZ

ROBERT BENNETT LUBIC  
MARK J. PALCHICK

FAX: (202) 686-8282

June 27, 1991

**ORIGINAL  
FILE**

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

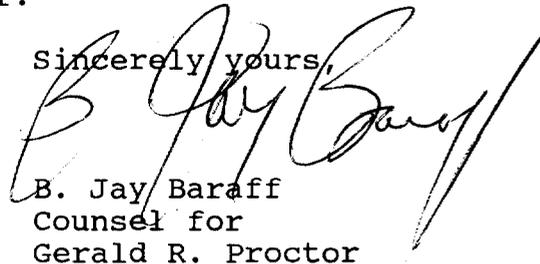
Re: RM-7739

Dear Ms. Searcy:

On behalf of Gerald R. Proctor, we submit herewith an original and five copies of his "Comments" in the above-referenced matter.

Kindly communicate with the undersigned should any question arise relative to this matter.

Sincerely yours,



B. Jay Baraff  
Counsel for  
Gerald R. Proctor

Enclosures

RECEIVED

JUN 27 1991

Before the  
Federal Communications Commission  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
MODIFICATION OF COMPARATIVE ) RM-7739  
POLICY STATEMENT )  
 )

To: Chief, Mass Media Bureau

COMMENTS

Gerald R. Proctor ("Proctor"), by his attorney, hereby again urges the Commission to adopt the above-captioned rule making, for the reasons stated by Proctor in his Petition for Rule Making, filed with the Commission on April 27, 1987<sup>1</sup>, and in his Petition for Reconsideration submitted to the Commission on September 16, 1987. Both documents are incorporated herein by reference. In summary, the Commission is again urged to initiate steps looking toward the modification of its Comparative Policy Statement (1 FCC 2d 393, 1965) to award a comparative preference to successful allocation rule making petitioners.

Respectfully submitted,

GERALD R. PROCTOR

By:   
B. Jay Baraff  
His Attorney

BJB/fb\16260\Petition

<sup>1</sup>That Petition was denied on August 17, 1987, by the Chief, Policy and Rules Division of the Mass Media Bureau.