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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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September 11, 1992

FAX: (202) 686-8282

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

Re: MM Docket No. 92-155  
RM-8020

Dear Ms. Searcy:

Transmitted herewith on behalf of Blair Communications, are an original and five (5) copies of its Comments in the above-referenced rulemaking proceeding.

Should questions arise with respect to this matter, kindly communicate directly with the undersigned.

Very truly yours,



Lee J. Peltzman  
Counsel for  
BLAIR COMMUNICATIONS

LJP:bpt  
Enclosure  
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Before the  
**Federal Communications Commission** FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554 OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section ) MM Docket No. 92-155  
73.202(b) ) RM-8020  
FM Broadcast Stations )  
(Blair, Nebraska, Storm Lake, )  
Perry and Sac City, Iowa) )

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

COMMENTS

Blair Communications ("BC"), by its attorneys, pursuant to Sections 1.415 and 1.420 of the Commission's rules, hereby submits its Comments in the above-captioned rulemaking proceeding. In support of its position, BC submits the following:

On July 23, 1992, the Commission released a Notice of Proposed Rule Making ("NPRM"), DA92-902, in which, inter alia, it proposed to substitute Channel 268C3 for Channel 297A at Blair, Nebraska and to modify the license of Station KBWH(FM) to specify operation on that higher class channel. Recognizing that its request constituted a nonadjacent channel upgrade and that its station license could not be modified were another party to express an interest in applying for Channel 268C3, the petitioner, Sunrise Broadcasting of Nebraska, Inc., also proposed that Channel 247C3 be allotted to Blair to accommodate any competing interest which might be filed.

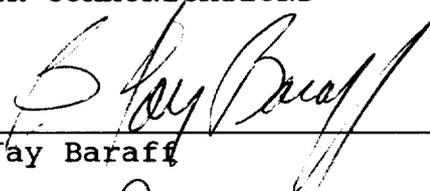
BC supports the allocation of Channel 247C3 at Blair, Nebraska as proposed by the Commission in its NPRM. The public interest would be served, since it would provide Blair with a second local transmission service. BC states that, if Channel 247C3 is allocated to Blair, it will file an application for a construction permit and, if its application is granted, it will promptly construct and operate a station on Channel 247C3 at Blair, Nebraska.

Accordingly, for the reasons expressed above, Blair respectfully urges that the Commission allot Channel 247C3 to Blair, Nebraska.

Respectfully submitted,

**BLAIR COMMUNICATIONS**

By: \_\_\_\_\_

  
B. Jay Baraff

By: \_\_\_\_\_

  
Lee J. Peltzman

Its Attorneys

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**September 11, 1992**

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**CERTIFICATE OF SERVICE**

I, Barbara P. Taylor, a secretary in the law office of Baraff, Koerner, Olender & Hochberg, P.C., do hereby certify that on this 11th day of September, 1992, copies of the foregoing document were mailed via United States postage prepaid to the following:

Ms. Leslie K. Shapiro\*  
Federal Communications Commission  
Mass Media Bureau  
2025 M Street, N.W., Room 8313  
Washington, D.C. 20554

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Rosenman & Colin  
1300 19th Street, N.W.  
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Washington, D.C. 20036

Barbara P. Taylor  
Barbara P. Taylor

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\*Via Hand Delivery

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