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

FILE

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations )  
(Brookings, Oregon) )

MM Docket No. 92-229  
RM-8083

COMMENTS OF KURY Radio, Inc.

KURY Radio, Inc. ("Petitioner"), by its attorneys, hereby submits its comments in support of the Commission's Notice Of Proposed Rule Making, DA 92-1304, released October 7, 1992. Petitioner supports the Commission's proposal that the FM Table of Allotments be amended to substitute Channel 237C2 for Channel 237C3 at Brookings, Oregon, and that Petitioner's license for Station KURY-FM, Brookings, Oregon, be modified to specify operation on the higher class channel.

On August 28, 1992, Petitioner filed with the Commission a "Petition For Rulemaking" requesting the FM channel substitution and license modification now proposed herein. The petition was accompanied by the attached August 17, 1992 Statement of Gerhard J. Straub, Consulting Engineer (Attachment A hereto), which indicated that the proposed channel substitution conforms in full with the Commission's channel separation requirements. The petition also indicated that the proposed channel substitution will provide primary service to a larger area containing approximately 3,075 more people.

Petitioner reiterates the representations in its August

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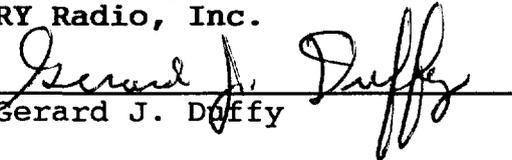
28, 1992 "Petition For Rulemaking," and incorporates that document by reference herein.

Upon grant of the proposed channel substitution, Petitioner will file with the Commission any and all applications necessary to obtain modification of Petitioner's license for Station KURY-FM, Brookings, Oregon, to operate on Channel 237C2 rather than Channel 237C3. Once authorized by the Commission to operate on Channel 237C2, Petitioner will promptly construct any and all facilities necessary for Station KURY-FM to operate on the higher class channel.

Petitioner's continuing support for the Commission's proposal is further indicated by the attached letter from Vern R. Garvin, its Secretary (Attachment B).

WHEREFORE, the above premises considered, Petitioner KURY Radio, Inc. reiterates its request that the FM Table of Allotments be amended to substitute Channel 237C2 for Channel 237C3 at Brookings, Oregon, and that the license of Station KURY-FM, Brookings, Oregon, be modified to specify operation on Channel 237C2.

Respectfully submitted,  
KURY Radio, Inc.

By   
Gerard J. Duffy

Its Attorney

Blooston, Mordkofsky,  
Jackson & Dickens  
2120 L Street, N.W.  
Washington, D.C. 20037  
(202) 659-0830  
Dated: November 18, 1992

**STATION KURY-FM  
95.3 MHZ, CHANNEL 237C2  
BROOKINGS, OREGON**

**STATEMENT OF GERHARD J. STRAUB, CONSULTING ENGINEER**

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by KURY Radio, Inc., licensee of Station KURY-FM, Brookings, Oregon, to prepare an engineering statement in support of a petition to amend the FM Table of Allotments.

**BACKGROUND**

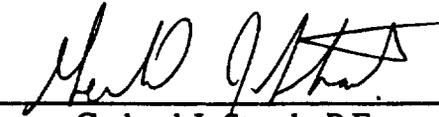
Station KURY-FM is currently licensed to operate on 95.3 MHz, Channel 237C3 to serve Brookings, Oregon, from a transmitter site located at North Latitude 42° 07' 23", West Longitude 124° 17' 56". It is proposed to upgrade the existing operation to Class C2 .

**ALLOCATION CONDITIONS**

A study of the existing Table of Allotments indicates that Channel 237C2 could be allocated to Brookings, Oregon, at the above specified coordinates in full conformance with the separation distances specified in Section 73.207 of the FCC Rules as shown in the table below:

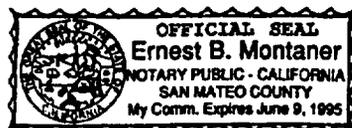
<u>Channel</u>	<u>Nearest Allotment</u>	<u>FCC Required Distance</u>	<u>Distance From Proposed Site</u>
234C2	KEWB(FM), Anderson, California	58 km	221 km
235C1	KOOS(FM), North Bend, Oregon	79	142
236C2	KNJM(FM), Lincoln City, Oregon	130	309
237A	KEDY(FM), Mount Shasta, California	166	188
238C	KXL-FM, Portland, Oregon	188	396
239C1	KBOY-FM, Medford, Oregon	79	109
240A	KNLF(FM), Quincy, California	55	373
290C2	KRSR-FM, Coos Bay, Oregon	20	137
291C	KARZ(FM), Burney, California	35	247

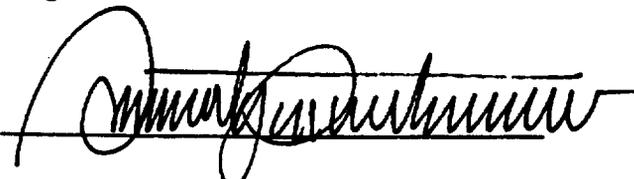
HAMMETT & EDISON, INC.  
Consulting Engineers

  
Gerhard J. Straub, P.E.



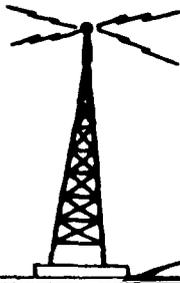
Subscribed and sworn to before me this 17th day of August, 1992





K U R Y

AM & FM  
REGIONAL COVERAGE



FM: 95.3 mhz

AM: 910 kc  
1000 Watts

Telephone  
503 469-2111  
P.O. Box 1029  
Brookings, Oregon 97415

Federal Communications Commission  
Washington D.C. 20554  
November 10, 1992

Attention: Secretary of the FCC

To better serve our listening audience, we want to change our classification from the present 237C3 to 237C2 channels. Due to the mountainous terrain and Pacific ocean, it is difficult with our present power to give an adequate signal strength in some of the valley's. We feel that by increasing our power, we will better serve the public interest of South Western Oregon and North Western California and not have so many dead spots.

We have had an engineering firm do a study and this will not cause any interference or overlap of existing commercial stations.

We would like to have this change granted.

Sincerely

A handwritten signature in cursive script, appearing to read "Vern R. Garvin".

Vern R. Garvin  
Secretary