

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

In the Matter of)	
)	
Proposals for a New FM Radio Broadcast)	MB Docket No. 18-184
Class C4)	
)	

To: Office of the Secretary
Attn: The Commission

COMMENTS

Southern Stone Communications, LLC (“Stone”), licensee of station WFKX(FM), Henderson, Tennessee, files its comments in the above captioned proceeding.¹ WFKX is a heritage urban station that has served the Jackson, Tennessee market for decades. It provides programming that is vital to and popular among the African American community in the Jackson area. Stone has looked into upgrade options for WFKX, but none are available. WFKX is a Class A station that operates with the maximum power (6 kilowatts) and height (100 meters HAAT) for Class A stations. However, it cannot upgrade to Class C3 because of co- and adjacent-channel stations. Stone submits that a new C4 class is appropriate in mid-size markets like Jackson, Tennessee, where there is spectrum available but, given the 73.207 spacing requirements, there are just enough other stations to prohibit upgrades. If WFKX were allowed to upgrade, this is a change that WFKX could make at its current site. Thus, Stone supports the Commission’s efforts to create a C4 class of stations.²

¹ *In the Proposals for a New FM Radio Broadcast Class C4 and to Modify the Requirements for Designating Short-Spaced Assignments*, Notice of Inquiry, FCC 18-69 (2018) (the “NOI”).

² Stone is not commenting on any of the other proposals in the NOI.

Respectfully submitted,

Southern Stone Communications, LLC

By: _____/s/_____
Paul Stone
Managing Member

August 13, 2018