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August 30, 1993

RECEIVED

AUG 30 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Amendment of Section 73.202(b),
FM Table of Allotments
Walla Walla and Waitsburg, Washington
(MM Docket No. 93-201; RM-8213; RM-8252)

Dear Mr. Caton:

Transmitted herewith on behalf of KHSS, Inc. is an original and four copies of its comments and counterproposal in connection with the above-referenced rule making proceeding. These comments are respectfully directed to the Chief, Allocations Branch.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,

John F. Garziglia
John F. Garziglia

Enclosures

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List A B C D E

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AUG 30 1993

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
Amendment of Section 73.202(b),)	MM Docket No. 93-201
Table of Allotments,)	RM-8213
FM Broadcast Stations.)	RM-8252
(Walla Walla and Waitsburg,)	
Washington).)	

To: Chief, Allocations Branch

COMMENTS AND COUNTERPROPOSAL

KHSS, Inc., the licensee of KHSS(FM), Walla Walla, Washington, by its attorneys, pursuant to Notice of Proposed Rule Making, DA 93-774, released July 8, 1993, hereby submits its comments and a counterproposal in the above-referenced proceeding.^{1/} KHSS, Inc. proposes the substitution of Channel 264C2^{2/} for Channel 264C3 at Walla Walla, Washington, and the modification of the KHSS(FM) facility to specify operation on Channel 264C2. In support thereof, the following is submitted:

1. By the Notice of Proposed Rule Making, the Commission is contemplating the addition of the allotment of new channels to Walla Walla and Waitsburg, Washington. The Notice of Proposed Rule Making states at appendix, paragraph 3(c) that:

The filing of a counterproposal may lead the Commission to allot a different channel than requested for any of the communities involved.

^{1/} Pursuant to Notice of Proposed Rule Making, comments were to be filed on or before August 30, 1993.

^{2/} Channel 264C2 may be substituted for Channel 264C3 at Walla Walla, Washington at the existing site coordinates for KHSS(FM) of 45° 59' 04" North Latitude, 118° 10' 08" West Longitude.

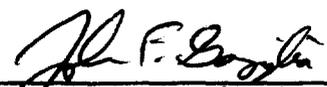
Because the Commission is considering allotment schemes for Walla Walla, it is possible that KHSS, Inc. could be foreclosed from seeking an upgrade of its facility on Channel 264C2 unless it files its proposal by the comment date set in this proceeding. Accordingly, KHSS, Inc. hereby submits its proposal to upgrade the facilities of KHSS(FM) to Channel 264C2 pursuant to Section 1.420(g) of the Commission's rules.^{3/} Attached is a channel study demonstrating that the allotment of Channel 264C2 fully complies with all Commission spacing rules.

2. KHSS, Inc. states that it has a present intention to file for Channel 264C2 when allotted, and when authorized, to build its upgraded facility promptly.

Respectfully submitted,

KHSS, INC.

By: _____


John F. Garziglia
Its Attorney

Pepper & Corazzini
1776 K Street, N.W.
Suite 200
Washington, D.C. 20006
(202) 296-0600

August 30, 1993

^{3/} It should be noted that KHSS(FM), under a former licensee, was upgraded to Channel 264C2. By the filing of an application for Channel 264C3, however, that former licensee downgraded the allotment of KHSS(FM) to Channel 264C3.

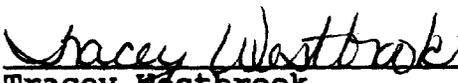
CERTIFICATE OF SERVICE

I, Tracey Westbrook, a secretary in the law firm of Pepper & Corazzini, do hereby certify that a true copy of the foregoing Comments and Counterproposal were sent this 30th day of August, 1993, by first class U.S. mail, postage prepaid, to the following:

Brett E. Miller
11608 Blossomwood Court
Moorpark, California 93021

Bogart-Funk Enterprises, Inc.
KZXR(FM)
1227 Hillcrest Drive
Prosser, Washington 99350
[Licensee of KZXR(FM), Prosser, Washington]

John F. Garziglia, Esquire
Pepper & Corazzini
1776 K Street, N.W.
Suite 200
Washington, D.C. 20006
(Counsel to Walla Walla Christian Broadcasters)



Tracey Westbrook