

RHEMA MEDIA  
107 West Main St.  
Pawhuska, Oklahoma 74056  
(918) 287-2459

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October 10, 1994

FCC

Secretary  
Federal Communications Commission  
FM Branch  
1919 "M" Street N.W.  
Washington, D.C. (zipcode)

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Reference: MM Docket No. 94-100 in the Matter of: RM-8509  
Amendment of Section 73.202(b).  
Table of Allotments  
FM Broadcast Stations.  
(Okmulgee, Nowata and Pawhuska, Oklahoma)  
Notice of Proposed Rulemaking

Dear Sir:

In reference to the case above, Rhema Media objects to the proposed licensing changes of KRIG's Channel 280A for Pawhuska, Oklahoma's Channel 285A (104.9). The proponents for the changes request the modification based on the premise that 285A is a vacant and unapplied-for channel and the public interest would be better served. That is untrue. Channel 285A's license is not unapplied for simply because the FCC has not opened a "window" on the license since that radio station's (KMYB-285A) license was suspended in March, 1991. Rhema Media has an interest in acquiring that licensing to serve the demographic area 285A was originally designated for because that particular area has a great need for a locally owned radio station. To that end, Rhema Media has kept abreast of all FCC publications since March, 1991, that would affect any licensing windows or changes in status of Channel 285A.

As for KRIG's "serving the community", they cannot possibly comply because they would be absentee owners. Rhema Media is a minority owned business located in Pawhuska, Oklahoma, whose owners have lived and worked in Pawhuska for over 50 years. We have worked for the local AM radio station when it was in operation in Pawhuska, thereby acquiring the knowledge of our community's needs experientially. We also conducted a poll of local residents and businesses to determine what was needed by the people the radio station serves. The current FM allocation 285A (FM 104.9) is correct and sufficient to serve this community well. We currently lack a local seven day per week news service. Radio service in this area must maintain a constant and local contact with the population due to the broadcasting needs of the community which are:

1. Local news and Emergency weather information such as local sightings of tornados which are not always broadcast on the Tulsa television or radio stations. (we live in an area named "tornado alley").

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2. Local community calendars for church, school and civic organization events and fundraising efforts and all functions which affect or are the concern of the local population.
3. Native American news such as meetings, religions meetings, social functions, fundraisers, language classes and any updates on those things specifically affecting Native Americans of many tribes.
4. Live broadcasts of sports events, live broadcasts of church services for shut-ins, live broadcasts of rodeos, local musical productions and so forth.

In summation:

We need a radio station that is primarily interested in Pawhuska and our citizens here since we are the heart of Osage County, being the county seat and also the heart of the Osage Nation which covers all of Osage County. KRIG is a Nowata station that has been moved to Bartlesville and cannot possibly fulfill the myriad needs of the Pawhuska area while based in Bartlesville or anywhere else. The radio station in Pawhuska must have local staffing to meet local needs seven days per week on a close personal basis and be an integral part of this community as opposed to an automated satellite broadcast facility.

Sincerely,

*Barbara Archambo Milleson*

Barbara Archambo Milleson  
President Rhema Media

cc: Four copies to FCC Board Members

John A. Karousos  
Acting Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

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**MAIL**

Mr. James Crutchfield  
FM Licensing Division  
Federal Communications Division  
Federal Communications Commission  
1919 "M" Street, N.W.  
Washington, D.C. 20554

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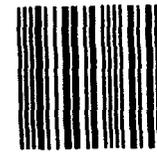
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