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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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

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

REPLY COMMENTS OF  
SINGER BROADCASTING GROUP, INC.

Singer Broadcasting Group, Inc. ("SBG"), by Counsel, and pursuant to the Notice of Proposed Rule Making ("NPRM"), DA 94-984 (released September 15, 1994) herewith submits its Reply Comments in the above-referenced proceeding.

Attached hereto is the Technical Statement of Jefferson G. Brock, wherein it is demonstrated that if KRIG, Inc. accepts Channel 285A at Nowata, Oklahoma, it may later upgrade to Class C3 status. Such a scenario would permit SBG to upgrade KRMP-FM to Channel 287C2./<sup>1</sup>

In light of the fact that KYFM Radio, Inc. withdrew its Comments in this proceeding on November 17, 1994, allocation of Channel 285A at Nowata, Oklahoma would permit SBG to upgrade its radio Station at Bixby, Oklahoma to Channel 287C2.

<sup>1</sup> Please be advised that SBG currently has pending an application to change the KRMP-FM Call Sign. As of this date, the application has not been granted so the requested call sign shall not be revealed.

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List A B C D E

SBG herein affirms its intention to file an application to upgrade its radio station to Channel 287C2 if this proceeding is resolved in its favor.

Respectfully submitted,

**SINGER BROADCASTING GROUP, INC.**

By:   
Cary S. Tepper, Esq.

Its Attorney

***Meyer, Faller, Weisman and Rosenberg, P.C.***  
4400 Jenifer Street, N.W.  
Suite 380  
Washington, D.C. 20015

(202) 362-1100

November 22, 1994

**REPLY COMMENTS**  
**MM DOCKET #94-100**  
**SINGER BROADCASTING GROUP, INC.**  
**KRMP-FM RADIO STATION**  
**BIXBY, OKLAHOMA**  
**November 1994**

TECHNICAL EXHIBIT

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**REPLY COMMENTS**  
**MM DOCKET #94-100**  
**SINGER BROADCASTING GROUP, INC.**  
**KRMP-FM RADIO STATION**  
**BIXBY, OKLAHOMA**  
**November 1994**

FEDERAL COMMUNICATIONS COMMISSION  
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**TECHNICAL STATEMENT**

1. This Technical Statement was prepared on behalf of Singer Broadcasting Group, Inc. ("Singer"), permittee of radio station KRMP-FM, Channel 287C3, Bixby, Oklahoma. Singer filed comments and a counterproposal in MM Docket #94-100 seeking to upgrade KRMP-FM to Channel 287C2 at Bixby, Oklahoma. As noted in its comments, the upgraded proposal for Bixby, Oklahoma, is mutually exclusive with the proposed allotment of Channel 286C3 at Nowata, Oklahoma.

2. During the comment period, two parties (KYFM Radio, Inc. and Johnson Communications, Inc.), in addition to the original petitioners, filed comments and counterproposals in MM Docket #94-100. Of these two parties, KYFM Radio, Inc., requested several additional options to the proposed allocation requested in the Notice of Proposed Rule Making. However, KYFM Radio, Inc., on November 17, 1994, withdrew its comments and counterproposal, therefore, its requests are not considered herein. Johnson Communications, Inc., licensee of KAMO-FM in Rogers, Arkansas, requested the upgrade of their facility from Channel 232C3 to Channel 232C2. Their request is contingent upon KRIG, Nowata, Oklahoma, being relocated off of Channel 232A.

3. Singer herein reiterates its desire to upgrade to Channel 287C2 at Bixby, Oklahoma, and notes that in its original comments it afforded the Nowata licensee the opportunity to upgrade to C3 albeit on Channel 285 rather than Channel 286. See Footnote 4, Technical Comments. KRIG, Inc., the Nowata licensee, noted in its comments that under no circumstances was it interested in a Class A channel at Nowata and only desired an upgrade to C3. Singer suggests that KRIG, Inc., accept Channel 285A in this proceeding, thus enabling it to simply file for a C3 upgrade at application time. This would, based on the withdrawal of the KYFM Radio, Inc., counterproposal, enable KTHK, Okmulgee, Oklahoma, to upgrade to Channel 231C1, would enable the upgrade at Bixby on Channel 287C2 and would facilitate an upgrade at Rogers, Arkansas. Therefore, all parties in this proceeding would be afforded an upgrade.

4. These technical comments were prepared on behalf of Singer Broadcasting Group, Inc., by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

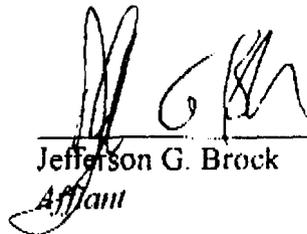
State of Georgia )  
St. Simons Island ) ss:  
County of Glynn )

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Singer Broadcasting Group, Inc., permittee of Radio Station KRMP-FM, to prepare the attached Technical Exhibit.

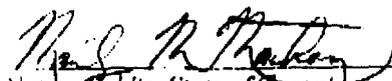
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 22nd day of November, 1994*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 22nd day of November, 1994*

  
Notary Public, State of Georgia  
My Commission Expires: September 8, 1995

CERTIFICATE OF SERVICE

I, Cary S. Tepper, Esquire, hereby certify that on this 7th day of November, 1994, I have served a copy of the foregoing "Comments of Singer Broadcasting Group, Inc." first-class, postage-prepaid, on the following:

\*John A. Karousos  
Acting Chief, Allocations Branch  
Policy & Rules Division, Mass Media Bureau  
Federal Communications Commission  
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\_\_\_\_\_  
Cary S. Tepper, Esq.

\*denotes Delivery By Hand