

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

DEC 2 1994

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations,)
(Okmulgee, Nowata and Pawhuska,)
Oklahoma))

MM Docket No. 94-100
RM-8509

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

REPLY COMMENTS AND STATEMENT OF CONTINUING INTEREST
OF
SINGER BROADCASTING GROUP, INC.

Singer Broadcasting Group, Inc. ("SBG"), by Counsel, and pursuant to the "Public Notice" Report No. 2041 (released November 18, 1994) herewith submits its Reply Comments and Statement of Continuing Interest in the above-referenced proceeding with respect to its Counterproposal, which was noted in the Public Notice.

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 KJMM-FM to Channel 287C2./¹

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 KJMM-FM at Bixby, Oklahoma to Channel 287C2.

¹ As of December 1, 1994, the FCC authorized a change in SBG's Call Sign from KRMP-FM to KJMM-FM.

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SBG herein affirms its intention to file an application to upgrade KJMM-FM 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

December 2, 1994

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

REPLY COMMENTS
MM DOCKET #94-100
SINGER BROADCASTING GROUP, INC.
KJMM RADIO STATION
BIXBY, OKLAHOMA
December 1994

TECHNICAL EXHIBIT

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REPLY COMMENTS
MM DOCKET #94-100
SINGER BROADCASTING GROUP, INC.
KJMM RADIO STATION
BIXBY, OKLAHOMA
December 1994

TECHNICAL STATEMENT

1. This Technical Statement was prepared on behalf of Singer Broadcasting Group, Inc. ("Singer"), permittee of radio station KJMM, Channel 287C3, Bixby, Oklahoma.¹ Singer filed comments and a counterproposal in MM Docket #94-100 seeking to upgrade KJMM 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,

1) The call sign associated with this station was changed from KRMP-FM to KJMM effective December 1, 1994.

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 KJMM, 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.

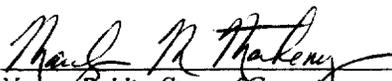
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 1st day of December, 1994



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 1st day of December, 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 2nd day of December, 1994, I have served a copy of the foregoing "Reply Comments and Statement of Continuing Interest 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
2025 M Street, N.W., Room 8322
Washington, D.C. 20554

Mark N. Lipp, Esq.
Mullin, Rhyne, Emmons and Topel, P.C.
1225 Connecticut Avenue, N.W.; Suite 300
Washington, D.C. 20036

Lawrence N. Cohn, Esq.
Cohn & Marks
1333 New Hampshire Avenue, N.W.; Suite 600
Washington, D.C. 20036-1573

RHEMA MEDIA
107 West Main Street
Pawhuska, OK 74056



Cary S. Tepper, Esq.

*denotes Delivery By Hand