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ANN BAVENDER*
KAREN L. CASSER*
ANNE GOODWIN CRUMP*
VINCENT J. CURTIS, JR.
RICHARD J. ESTEVEZ
PAUL J. FELDMAN*
ERIC FISHMAN*
RICHARD HILDRETH
FRANK R. JAZZO
ANDREW S. KERSTING*
KATHRYN A. KLEIMAN
EUGENE M. LAWSON, JR.
HARRY C. MARTIN
GEORGE PETRUTSAS
LEONARD R. RAISH
JAMES P. RILEY
KATHLEEN VICTORY*
HOWARD M. WEISS

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET
ROSSLYN, VIRGINIA 22209-3801

(703) 812-0400

TELECOPIER

(703) 812-0486

INTERNET

FLETCHERHEALD@msn.com

FRANK U. FLETCHER
(1939-1985)
ROBERT L. HEALD
(1956-1983)
PAUL D. P. SPEARMAN
(1936-1982)
FRANK ROBERSON
(1936-1981)
RUSSELL ROWELL
(1948-1977)

RETIRED
EDWARD F. KENEHAN

CONSULTANT FOR INTERNATIONAL AND
INTERGOVERNMENTAL AFFAIRS
SHELDON J. KRYS
U. S. AMBASSADOR (ret.)

OF COUNSEL
EDWARD A. CAINE*

WRITER'S NUMBER
(703) 812-

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

* NOT ADMITTED IN VIRGINIA

July 11, 1996

BY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: MM Docket No. 96-80
RM-8758
Deerfield, MO and Bartlesville, OK

Dear Mr. Caton:

Transmitted herewith, on behalf of KYFM Radio, Inc., licensee of Station KYFM(FM), Bartlesville, Oklahoma, are an original and four copies of its "Comments on Counterproposal" in the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,
FLETCHER, HEALD & HILDRETH, P.L.C.

Anne Goodwin Crump
Anne Goodwin Crump
Counsel for KYFM Radio, Inc.

Enclosures

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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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JUL 11 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),) MM DOCKET NO. 96-80
Table of Allotments, FM Broadcast Stations) RM-8758
(Deerfield, Missouri and Bartlesville, Oklahoma))

Directed to: Chief, Allocations Branch

COMMENTS ON COUNTERPROPOSAL

KYFM Radio, Inc. ("KYFM"), licensee of Station KYFM(FM), Bartlesville, Oklahoma, by its attorneys, hereby respectfully submits its Comments on its Counterproposal in the above-captioned proceeding in response to the Commission's Public Notice, Report No. 2140, released July 8, 1996. With respect thereto, the following is stated:

1. On June 10, 1996, KYFM submitted its "Comments and Counterproposal" in response to the Commission's Notice of Proposed Rule Making, DA 96-451, released April 18, 1996 ("NPRM") which proposed, at the request of Dale Hendrix ("Hendrix"), that Channel 261C3 be allotted to Deerfield, Missouri, as that community's first local service. KYFM proposed that Channel 264C3 be allotted to Deerfield in lieu of Channel 261C3, and that Channel 261C1 be substituted for Channel 260C3 at Bartlesville, Oklahoma, and that the authorization for KYFM(FM) be upgraded to specify operation on Channel 261C1. In order to accommodate this upgrade, it also requested that Channel 284A be substituted for Channel 261A at Ponca City,

Oklahoma, and the license for KIXR(FM) be modified to specify operation on this channel, and that Channel 278C1 be substituted for the vacant allotment of channel 284C1 at Alva, Oklahoma. KYFM also demonstrated that all of the proposed changes are in accordance with the Commission's distance separation requirements. The arrangement proposed would not only provide a first local service for Deerfield, Missouri, but also allow the upgrade of KYFM(FM) and improved service for KIXR(FM).

2. The Commission's records indicate that KYFM was the only party to file Comments in this proceeding. Mr. Hendrix did not indicate any continuing interest in the proposed Deerfield allotment. The Commission may therefore determine that no channel should be allotted to Deerfield. That determination would be irrelevant to the proposed upgrade of KYFM(FM), however, and the public would benefit from improved service from both KYFM(FM) and KIXR(FM). No party indicated any opposition to KYFM's counterproposal.

3. KYFM hereby reaffirms that, if the channel substitutions proposed are adopted, it will expeditiously apply for a construction permit for facilities on Channel 261C1 and will promptly construct such facilities in accordance with the construction permit granted. KYFM also reaffirms its understanding of its responsibility to reimburse KIXR(FM) for its reasonable expenses incurred solely in connection with its change in frequency.

WHEREFORE, the premises considered, KYFM respectfully requests that the FM Table of Allotments be amended to substitute Channel 261C1 for Channel 260C3 at Bartlesville, Oklahoma, to substitute Channel 284A for Channel 261A at Ponca City, Oklahoma, and to substitute Channel 278C1 for the vacant allotment of channel 284C1 at Alva, Oklahoma. .

Respectfully submitted,

KYFM RADIO, INC.

By:



James P. Riley

Anne Goodwin Crump

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 N. 17th Street
Eleventh Floor
Rosslyn, Virginia 22209
(703) 812-0400

July 11, 1996

CERTIFICATE OF SERVICE

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that a copy of the foregoing "Comments on Counterproposal" was sent this 11th day July of, 1996, by first-class United States mail, postage prepaid, to:

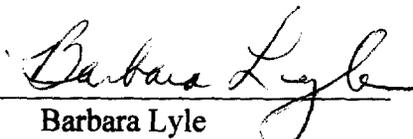
Mr. John A. Karousos*
Mass Media Bureau
Federal Communications Commission
Room 554
2000 M Street, N.W.
Washington, D.C. 20554

Mr. Dale Hendrix
873 Allen Road
Murfreesboro, TN 37129

KIXR(FM)
Mur-Thom Broadcasting, Inc.
P.O. Box 2631
Ponca City, OK 76402

KHST Broadcasting Company
Rt. 1, Box 725
Bolivar, MO 65613

*By Hand Delivery


Barbara Lyle