

Secretary
Federal Communications Commission
1919 M St NW
Washington, DC 20554

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FCC
JAN 21 1997

Re: MM Docket No. 97-116
RM 9050

Keith Reising pursuant to Section 1.420 (d) of the Rules, hereby files this opposition to the Counterproposal of InterMart West Coast, Inc. to delete Channel 223C3 from Labelle, FL and assign WKZY FM to Estero, FL.

1. InterMart's proposal would be contrary to the FCC's Policy of not allowing a "Move in" from a small city to a large city.

2. Their proposal would deny two small towns (LaBelle, FL and Everglades City, FL) of having their own local Radio Station.

3. The application of Toccoa Falls College for a new Non-Commercial station on channel 202 (88.3mhz) for LaBelle, FL, CAN NOT be considered. It is NOT granted and IF granted, there is NO assurance that it will be built. Under present FCC Rules, a station must be built and Licensed before it can be considered.

4. The Channel 202 application for LaBelle, even if granted would be an inferior service when compared to the existing LaBelle WKZY. As shown in the attached

Exhibit 1, the City grade Signal (70dbu) of the proposed ch 202 for LaBelle would go only 10.9 kilometers, whereas the existing CP for WKZY FM shows a city grade (70dbu) distance of 23.5 kilometers.

5. Estero, Florida already has a Local Radio Station, WJBX, 99.3 mhz, 50,000 watts, which is licensed to the Community of Fort Myers Beach, FL., which is a geographic part of Estero or vice versa. When driving along the Fort Myers Beach Coast road, one can not tell when you have left one and entered the other.

6. Everglades City, FL currently receives only one (1) City grade (70dbu) FM signal, WAVV. Ch 266 C1, Marco Island, FL.

7. Everglades City, FL, currently receives only only one (1) City Grade (5mvm) Signal, WODX, 1480 KHZ, Marco Island, FL.

For the above reasons, it is respectfully requested that the petition of InterMart Broadcasting West Coast, Inc. to Delete Ch. 223 from LaBelle, FL and move it to Estero, FL, be dismissed and denied. Assigning Ch. 224A to Everglades City, FL would allow TWO Communities to have a local radio station.



Keith Reising
Petitioner for 224A, Everglades City, FL

Exhibit 1

Bearing Degrees	Height Meters	HAAT Meters	ERP Kilowatts	50,50 70 dB	50,50 60 dB	Kilometers
0.0°:	6.1	99.9	25.000	23.5	38.5	
45.0°:	6.1	99.9	25.000	23.5	38.5	
90.0°:	6.1	99.9	25.000	23.5	38.5	
135.0°:	6.1	99.9	25.000	23.5	38.5	
180.0°:	6.1	99.9	25.000	23.5	38.5	
225.0°:	6.1	99.9	25.000	23.5	38.5	
270.0°:	6.1	99.9	25.000	23.5	38.5	
315.0°:	9.3	96.7	25.000	23.2	37.8	

WKZY 223 C3, LaBelle, FL
Contours

Exhibit 1

Bearing Degrees	Height Meters	HAAT Meters	ERP Kilowatts	50,50 70 dB	50,50 60 dB	Kilometers
0.0°:	0.0	56.0	3.400	10.9	19.2	
45.0°:	0.0	56.0	3.400	10.9	19.2	
90.0°:	0.0	56.0	3.400	10.9	19.2	
135.0°:	0.0	56.0	3.400	10.9	19.2	
180.0°:	0.0	56.0	3.400	10.9	19.2	
225.0°:	0.0	56.0	3.400	10.9	19.2	
270.0°:	0.0	56.0	3.400	10.9	19.2	
315.0°:	0.0	56.0	3.400	10.9	19.2	

Application of Toccoa Falls College
Ch. 202
3.4 KW at 49 meters HAAT 56 meters AMSL

CERTIFICATION

Keith Reising certifies that on the 16th day of June, 1997, copies of the foregoing were mailed to the following:

Secretary
Federal Communications Commission
Washington, DC 20554

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Keith Reising