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AUG 28 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20554

In re Applications of)	MM DOCKET NO. 97-77
)	
GREATER WASHINGTON EDUCATION)	File No. BPED-930617MD
TELECOMMUNICATIONS ASSOCIATION, INC.))	
Channel 219B)	
Leonardtown, Maryland)	
)	
For Construction Permit for a New)	
Noncommercial Educational FM Station)	
)	
COLUMBIA UNION COLLEGE)	File No. BPED-930723MB
BROADCASTING, INC.)	
Channel 220B)	
Takoma Park, Maryland)	
)	
For Modification of Facilities of)	
Station WGTS-FM)	
Takoma Park, Maryland)	
)	
To: Administrative Law Judge		
Richard L. Sippel		

MASS MEDIA BUREAU'S COMMENTS ON PETITION FOR LEAVE TO AMEND

1. On July 29, 1997, Greater Washington Educational Telecommunications Associations, Inc. ("GWETA") and Columbia Union College Broadcasting, Inc. ("CUC"), filed a Joint Motion for Suspension of Procedural Dates ("Joint Motion") in which the parties reported that CUC had "determined to amend its application so that the present technical impasse that exists between the GWETA and CUC application will be resolved." On August 7, 1997, CUC filed a Petition for Leave to Amend its application and an amendment modifying its engineering proposal in order to eliminate the conflict between the two applications. The Mass Media Bureau ("Bureau") hereby offers the following comments.

2. The CUC amendment proposes a directional antenna in order to eliminate the prohibited contour overlap of the two applications. The amendment would result in a 17% reduction in the service area and does not propose service to any new areas not already covered by the original application. Further, by declaration included with the amendment, CUC's President Gerald Fuller states that no one

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associated with CUC was promised or received any consideration in return for the filing of the amendment. On August 15, 1997, GWETA filed comments in support of the amendment. Included in GWETA's comments was a declaration by its Vice President and General Counsel, N. William Jarvis, indicating that no money or other consideration was paid or promised to GWETA or its principals in connection with the filing of the CUC amendment.

3. Based upon an analysis of the proffered amendment by the Bureau's engineering staff, we have concluded that CUC's amendment complies with Commission technical rules. In addition, acceptance of the amendment would eliminate the mutual exclusivity between CUC and GWETA, permitting the grant of both applications. For that reason, there is good cause for acceptance of the amendment.

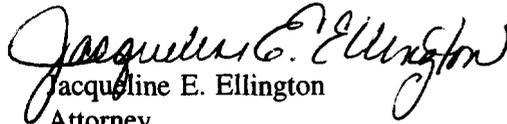
4. The CUC amendment and declarations submitted by CUC and GWETA satisfy the requirements of Section 73.3525 of the Commission's Rules, which implement Section 311(c)(3) of the Communications Act of 1934, as amended. Specifically, CUC and GWETA have established that acceptance of the amendment is in the public interest, that neither of the applications was filed for an improper use, and that no consideration was paid or received to file the amendment.

5. Accordingly, the Mass Media Bureau supports acceptance of the proffered amendment, grant of the Greater Washington Educational Telecommunications Association and Columbia Union College Broadcasting, Inc., applications, and termination of this proceeding.

Respectfully submitted,
Roy J. Stewart
Chief, Mass Media Bureau



Norman Goldstein
Chief, Complaints and Political Programming Branch



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August 22, 1997

CERTIFICATE OF SERVICE

Chante Chisolm, a secretary in the Hearing Branch, Mass Media Bureau, certifies that she has on this 22nd day of August, 1997, sent by regular United States mail, U.S. Government frank, a copy of the foregoing "**Mass Media Bureau's Comments on Petition for Leave to Amend**" to:

Administrative Law Judge Richard L. Sippel
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