

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

In the Matter of	)	
	)	
Amendment of Section 73.202(b),	)	MM Docket No. 98-59
Table of Allotments,	)	RM-9256
FM Broadcast Stations	)	
(Casper, Wyoming).	)	

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JUN 30 1998  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

REPLY COMMENTS OF CITICASTERS CO.

Citicasters Co. ("Citicasters"), by its attorneys and pursuant to Section 1.415 of the Commission's Rules, hereby submits these reply comments in response to the counterproposal filed by Mountain State Radio, Inc. ("Mountain State") in the above-captioned proceeding. Mountain State proposes the allotment of Channel 228C1 to Guernsey, Wyoming, Channel 242C to Lusk, Wyoming, and Channel 262C to Sinclair, Wyoming. 1/

While Mountain State's counterproposal would allot the first local service to the communities of Guernsey, Lusk, and Sinclair, Wyoming, these communities have extremely low populations. 2/ Because of the sparse population that reside in these communities, allotment of Channels 228C1, 242C and 262C to

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1/ In the Commission's *Notice of Proposed Rule Making*, DA 98-771 (released April 24, 1998), the Commission sought comments on the proposal to allot three new FM stations on Channels 228C1, 243C1 and 263C1 to Casper, Wyoming, as the community's eighth, ninth, and tenth local commercial FM transmission services.

2/ As indicated in Mountain State's counterproposal, according to the 1990 Census, Guernsey has a population of 1,155, Lusk has a population of 1,504, and Sinclair has a population of 500. See Mountain State Counterproposal at 1-2.

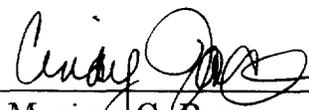
these communities would provide service to far fewer people than the allotment of three class C1 stations to Casper, Wyoming, which has a population of 46,742 people.

Under the criteria provided in Section 309 of the Communications Act of 1934, as amended, the Commission should not award class C stations to smaller communities when such allotments would preclude the use of the channels for service to far more persons, as would the Casper proposals. Citicasters, an experienced broadcaster, also believes that it would be cost prohibitive to operate a class C1 station in Guernsey and class C stations in Lusk and Sinclair as Mountain State has proposed, in light of the extremely low populations in these communities.

Citicasters submits that its original proposal to allot three new FM stations on Channels 228C1, 243C1 and 263C1 at Casper, Wyoming, would provide service to a greater number of people than Mountain State's counterproposal and would better serve the public interest. As such, the Commission should reject Mountain State's counterproposal and allot Channels 228C1, 243C1 and 283C1 to Casper, Wyoming.

Respectfully submitted,

HOGAN & HARTSON L.L.P.

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June 30, 1998

CERTIFICATE OF SERVICE

I, David A. Maybee, Jr., hereby certify that on June 30, 1998, a copy of the Reply Comments of Citicaster Co. was served by First Class Mail, postage prepaid, upon the following:



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