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SEP 18 1998

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September 18, 1998

**BY HAND DELIVERY**

Magalie R. Salas, Esquire  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

Re: Comments of Whitehall Broadcasting Company  
Whitehall, Montana  
MM Docket No. 98-138; RM-9309

Dear Ms. Salas:

Transmitted herewith on behalf of Whitehall Broadcasting Company are an original and four copies of its Comments in the above-referenced proceeding in support of the proposed allotment of Channel 274A at Whitehall, Montana, as that community's first local FM broadcast service. See *Notice of Proposed Rulemaking*, DA 98-1486 (released July 31, 1998).

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

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



Andrew S. Kersting  
Counsel for Whitehall Broadcasting Company

Enclosure  
cc (w/ encl.): Certificate of Service (by hand)

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BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

SEP 18 1998

In the Matter of	)	
	)	
Amendment of Section 73.202(b),	)	MM Docket No. 98-138
Table of Allotments,	)	RM-9309
FM Broadcast Stations,	)	
(Whitehall, Montana)	)	
To: Chief, Allocations Branch		

**COMMENTS**

Whitehall Broadcasting Company ("WBC"), by counsel, and pursuant to Section 1.415 of the Commission's rules, hereby submits its comments in support of the *Notice of Proposed Rule Making*, DA 98-1486 (released July 31, 1998) ("*NPRM*"), proposing the allotment of Channel 274A to Whitehall, Montana, as that community's first local FM broadcast service.

WBC initiated this proceeding through its "Petition for Rulemaking," filed June 26, 1998. If the Commission should adopt its proposal and allot Channel 274A at Whitehall, WBC hereby states that it will apply for a construction permit for a new FM station to operate on Channel 274A at Whitehall, Montana, and, if its application is granted, will promptly construct the new facility to serve Whitehall and the surrounding area as that community's first local FM broadcast service.

As noted in the *NPRM*, Channel 274A can be allotted to Whitehall in compliance with the Commission's minimum distance separation requirements provided there is a site restriction of 12.7 kilometers (7.9 miles) northwest of the community in order to avoid a conflict with an application for Channel 275C at Island Park, Idaho (File No. BPH-961023MJ). Therefore, the proposed allotment of Channel 274A at Whitehall, Montana, would serve the public interest.

WHEREFORE, in light of the foregoing, Whitehall Broadcasting Company respectfully requests that Channel 274A be allotted to Whitehall, Montana, as that community's first local FM broadcast service.

Respectfully submitted,

WHITEHALL BROADCASTING COMPANY

By: \_\_\_\_\_

*Frank R. Jazzo*  
Frank R. Jazzo  
Andrew S. Kersting

Its Counsel

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September 18, 1998

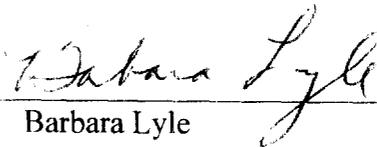
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**CERTIFICATE OF SERVICE**

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 18th day of September, 1998, copies of the foregoing "Comments" were hand delivered to the following:

John A. Karousos, Chief  
Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
2000 M Street, N.W., Room 554  
Washington, DC 20554

Ms. Kathleen Scheuerle  
Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
2000 M Street, N.W., Room 564  
Washington, DC 20554

  
Barbara Lyle