

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	Docket No. MB _____
Amendment of Section 73.207,)	RM-11727
73.211, 73.215, and 73.3573 of the)	
Commission's Rules related to)	
Minimum Distance Separation)	
Between Stations, Station Classes)	
Power and Antenna Height)	
Requirements, Contour Protection)	
for Short Space FM Assignments,)	
and Processing FM Broadcast)	
Station Applications)	

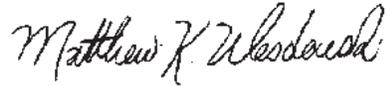
To: Marlene Dortch, Secretary
Federal Communications Commission
Attention: Media Bureau

REPLY COMMENTS OF PETITIONER

SSR Communications, Inc. ("Petitioner") hereby submits its Reply Comments in the above-captioned proceeding, now designated as RM-11727. In its original Petition for Rulemaking ("Petition") and initial comments ("Comments"), Petitioner requested certain changes to Sections 73.207, 73.211, 73.215, 73.3573, and 74.1203 (added as part of its Comments), which, if adopted, would create an intermediate 12 kW "C4" FM allotment classification, a "Show Cause Order" by which stations operating with sub-maximum class facilities could be conferred 73.215 status, and certain changes to FM translator rules. In addition to an informal support letter co-signed by 143 total broadcasters (representing 653 stations, attached to Comments as 'Exhibit A - Petition Support Letter') endorsing the Petition, the Commission received approximately 87 additional filings in RM-11727, with only a handful in opposition to the proposals.

Given the *overwhelming* industry support of the Petition, both explicitly and informally, Petitioner respectfully requests that the Commission move to issue a formal Notice of Proposed Rulemaking ("NPRM") to address the proposals herein without delay.

Respectfully submitted,



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October 3, 2014