

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

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DEC - 7 1998

In the matter of)
)
Amendment of Section 73.201(b))
Table of Allotments)
FM Broadcast Stations)
(Paonia and Olathe, Colorado))

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**
MM Docket No. 98-188
RM No. 9346

COUNTERPROPOSAL AND ADDITIONAL COMMENTS

Good Government Radio (GGR) submits a request to the Federal Communications Commission to accept a counterproposal for a new FM channel at Olathe, Colorado. Good Government Radio has hired a person which is knowledgeable in FCC and technical matters, but the certifications and representations made in this request are by a principal/partner of the petitioner. GGR exercises its right to petition for a new FM radio station channel, and if GGR is the successful applicant, it will give average American citizens an opportunity to express their views.

The channel request at Olathe is channel 293C. According to the technical person retained by GGR, this station channel can be placed at Olathe if channel 293A at Paonia, Colorado is moved to channel 270A. When this move is made, GGR can have channel 293C placed at Olathe, Colorado. It has been determined that channel 270A can be the channel used at Paonia and channel 293C can be used at Olathe, therefore, GGR, the petitioner for channel 293C at Olathe, makes the following statements:

General

1. Olathe, Colorado is an incorporated community in Montrose County, with a 1990 Census population of 1,263.
2. Paonia presently has local service from KVNF, and the proposed channel 293 is a second local service. However, Paonia can have a second local service by using channel 270A (or higher classification) depending on the desire of the petitioner.
3. Olathe (Montrose County) needs an additional FM radio station to allow local citizens an opportunity to express themselves instead of playing music constantly.
4. Olathe meets the FCC requirements for local aural service, since it is incorporated and has community standing with the state of Colorado.
5. GGR is a for profit group that will operate the new FM station at Olathe for profit and will file an application for a construction permit if the FCC allots channel 293C at Olathe.

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6. GGR has attached the required certification for a counterproposal filed without an attorney.
7. GGR will not be required to compensate for the expenses required by the channel substitution expenses at Paonia, Colorado if GGR is the successful applicant. GGR intends to be the successful applicant. GGR will not be required to Paonia, Colorado if a permit is granted at Paonia before a permit is granted at Olathe.

Technical

1. The coordinates at the top of the attached channel runs were used as reference for the attached study.
2. Channel 270A at Paonia and channel 293C at Olathe can be substituted without additional substitutions.
3. The study for channel 270A at Paonia uses the FCC database coordinates as reference.
4. Required Channel Studies.

Study # 1 confirms full spaced requirements for channel 293C - Olathe, CO (after channel 270A is substituted for channel 293A at Paonia).

Study # 2 confirms full spaced requirements for channel 270A at present site of Paonia, CO
5. After these substitutions, the spacing study demonstrates that channel 293C can be placed at Olathe without shorting any other stations or channels. Due to the unique programming GGR plans to offer to the remote, sparsely populated rural area, a full class C is needed for adequate service.

Conclusion

1. Channel 293C is clear for allotment at Olathe after channel 93A is changed for channel 270A at Paonia.
2. GGR will file for the channel when the window is opened at Olathe, and if granted the CP, will serve the residents of Montrose County with an aural service that promotes FREEDOM OF SPEECH.

Certifications

1. See attached signature page and certificate of service.
 2. See the certificate of service to the petitioner for channel 293A at Paonia.
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CERTIFICATION

I, Ellinor Nelson of Good Government Radio, the petitioner for channel 293C at Olathe, Colorado, do hereby verify that the statements contained in the instant document are true and correct to the best of my knowledge and belief.

Submitted by:
GOOD GOVERNMENT RADIO

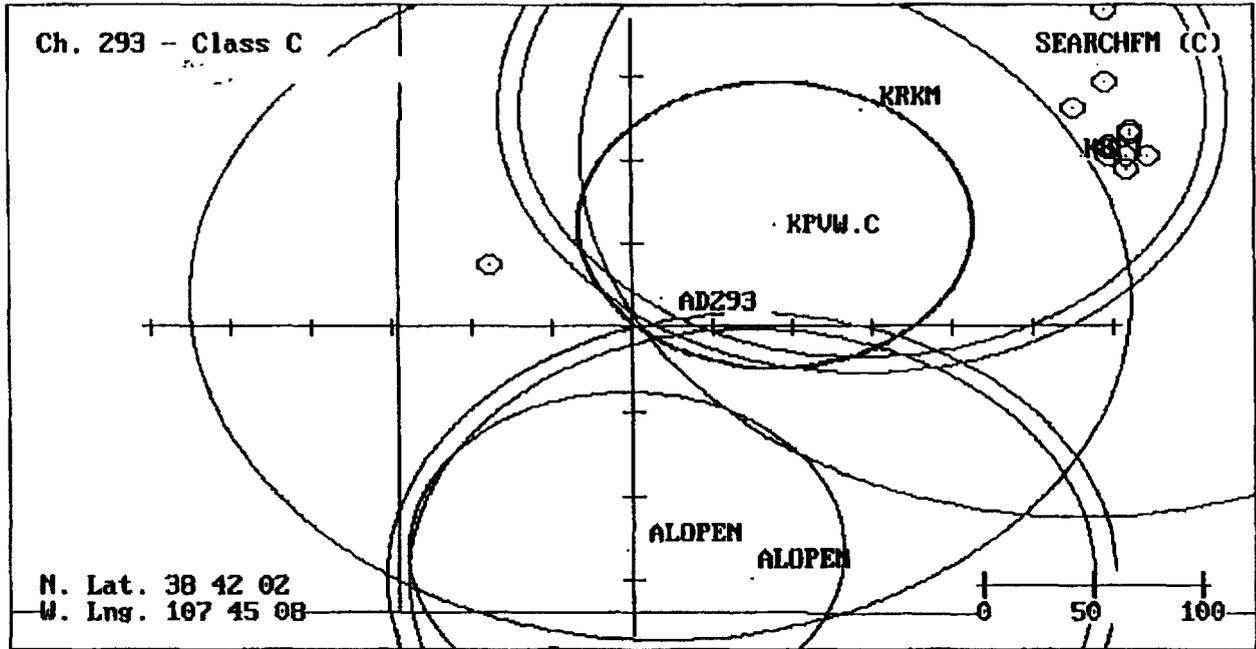
Signed by:


Ellinor Nelson

November 16, 1998

Ellinor Nelson
Good Government Radio
P. O. Box 478
Gonzalez, FL 32560

GOOD GOVERNMENT RADIO
P.O. BOX 478 GONZALEZ, FL 32560



Current rules spacings
CHANNEL 293 -106.5 MHz

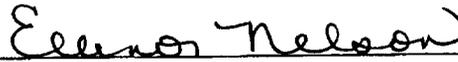
CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
AD293	293A	Paonia	CO	36.5	23.18	226.0	-202.82 *
KPVW.C	296C3	Aspen	CO	45.2	96.87	96.0	0.87 <
ALOPEN	292C3	Pagosa Springs	CO	161.1	177.00	176.0	1.00 <
KNFO	291A	Basalt	CO	45.2	96.78	95.0	1.78 <
KBPI	294C	Denver	CO	62.2	245.64	241.0	4.64
KRKM.C	292C3	Kremmling	CO	37.8	183.27	176.0	7.27
KWUFFM	292A	Pagosa Springs	CO	161.1	177.00	165.0	12.00
KRKM	292A	Kremmling	CO	37.8	183.27	165.0	18.27
AP296	296C	Silverton	CO	181.3	148.43	105.0	43.43
ALOPEN	296C	Silverton	CO	181.3	148.43	105.0	43.43

STUDY #1

CERTIFICATE OF SERVICE

I, Ellinor Nelson, an owner of Good Government Radio, do hereby certify that I have on this 7th day of December, 1998 cause to be mail by first class mail, postage prepaid, copies of the foregoing "COUNTERPROPOSAL" to the following:

Angel T. Bubudro
Petitioner for Channel 293A
302 Grand Avenue
P.O. Box 132
Panoia, CO 81428



Ellinor Nelson