

Before The DOCKET FILE COPY ORIGINAL
Federal Communications Commission
Washington, D.C.

In The Matter Of:)	MM Docket No. 99-23
)	
Amendment of Section 73.202(b),)	RM-9423
Table of FM Allotments)	
(Tipton, Mangum & Eldorado, OK))	
)	
To: The Chief, Allocations Branch)	
Policy and Rules Division)	

100-9423
 MAR 31 1999
 COMMUNICATIONS DIVISION

REPLY COMMENTS OF TEXAS GRACE COMMUNICATIONS

Following a customary search of the Commission's data bases and records, it has been determined that only two (2) parties, Texas Grace Communications ("Texas Grace"), and Good Government Radio ("GGR"), timely made Comments or Counterproposals (file-stamped as received by the FCC by March 15, 1999) connected to the proceeding/NPRM captioned above.

GGR merely reiterates its desire to see new channel 249 C2 service allocated to Tipton, Oklahoma, via a circuitous plan that needlessly forces two channel substitutions and requires a show cause order proceeding...plus places a more cumbersome site restriction on any potentially constructed facility....when a *direct allocation* on channel 275 C2 (counterproposed by Texas Grace) allows for a facility to be built closer to the subject service community, and necessitates no channel substitutions or potential service interruption to the public.

Texas Grace notes that, upon reviewing GGR's comments of March 15, 1999 (incorporated herein by reference), the only new element is that GGR is now claiming that "it won't operate for profit". This contradicts GGR's initial Petition for Rulemaking ("Request for New FM Radio Channel Placement" of November 16, 1998, incorporated by reference), wherein GGR specifically states that it "is a for profit group that will operate the new FM station at Tipton for profit".

By this Reply, Texas Grace wishes to respectfully reiterate and reaffirm its March 15, 1999 Comments and Counterproposal to the above captioned proceeding/NPRM (incorporated herein by reference).

In synopsis, Texas Grace has counterproposed: Provision of first local service to Tipton, Oklahoma via direct allocation on Channel 275 C2; Upgrading of KRZB (FM), Archer City, Texas service from Channel 248 C2 to Channel 248 C1; Allotment of a new first aural service for the community of Granite, Oklahoma on Channel 282 C3;

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and absolutely no service interruption or channel substitution for the present broadcast service at Mangum, Oklahoma, or allocation at Eldorado, Oklahoma.

As demonstrated in its previously submitted legal and engineering statement and exhibit, Texas Grace's Counterproposal offers a plan which is clearly in the public interest, serves Commission allocation priority, and results in a far superior arrangement of allotments than that petitioned by GGR.

The Allocations Chief is most welcome to contact Texas Grace's Attorney of record for this proceeding, John Trent, at (703) 437-8400, or its Engineering consultant, Lee Wheeler, should any additional information be needed. (However, the Reply contained herein has been submitted directly by Texas Grace's proprietor).

Respectfully submitted,

Texas Grace Communications

By: 
Dave Garey,
Texas Grace Communications Owner/Proprietor

March 26, 1999

Texas Grace Communications
P.O. Box 398
Wichita Falls, TX 76307

With Request That Written Correspondence by the Commission, or Comments by Any Parties Pertaining to this Proceeding, be Concurrently Served Upon:

Mr. John Trent, Attorney
Putbren Hunsaker & Trent
100 Carpenter Dr. #100
Sterling, VA 20167

Certification for Filing Without an Attorney:

I, Dave Garey, proprietor of Texas Grace Communications, hereby affirm that the statements contained within the attached Reply Comment filing are true and correct to the best of my knowledge and belief, and that I will gladly repeat this affirmation if required.



Dave Garey
March 26, 1999

Certificate of Service

I, Dave Garey, on behalf of Texas Grace Communications, do hereby certify that I have, on March 26, 1999, sent by First Class United States Mail, postage prepaid, the attached "*Reply Comments of Texas Grace Communications*" to Ellinor Nelson from Good Government Radio. Said correspondence was sent to:

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



Dave Garey
March 26, 1999