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Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Portals 11, TW-A323
445 Twelfth Street, Southwest
Washington, D. C. 20554

Re: Docket No. 99-13 RM-9428

OPPOSITION TO PETITION OF
PRAWN BROADCASTING COMPANY TO
REMOVE RADIO STATION KMKS (FM 102.5)
FROM MATAGORDA COUNTY, TEXAS AND
RELOCATE THE SAME IN WHARTON COUNTY, TEXAS

It is my understanding that contrary to the desires of radio station KMKS (102.5 FM), there is pending an application of Prawn Broadcasting to move KMKS to a point 18 miles N.W. of El Campo, Texas.

Until this year I served as County Judge of Matagorda County, Texas. By virtue of law the County Judge is in charge of all emergency management services in the county. As a former County Judge for six and one-half years, and as a 45 year resident of this county, I strongly oppose the proposed relocation of KMKS (102.5 FM) from Bay City (the county seat of Matagorda County, Texas) to a location in Wharton County some 50 airline miles from Bay City.

Such relocation carries no benefit for the residents of our county but to the contrary would be detrimental to their safety and well-being. I make this bold statement because:

1. We are a low-lying coastal county frequently subject to the ravages of tropical hurricanes and flooding;
2. There is a large nuclear generating station centrally located in our county;
3. We are a large oil & gas producing county (8th in Texas) with petrochemical plants and a network of pipelines (and highways) carrying oil, gas and toxic materials; and,
4. Radio station KMKS (102.5 FM) is a long-term

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responsive part of our county-wide emergency management system.

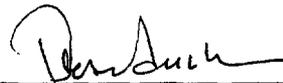
Our emergency management team is highly trained and organized. KMKS-102.5 FM is an integral part of that team. They willingly participate in our drills and provide a large and reliable portion of our communication with the residents of this county in times of real emergency. Our team has had a perfect score from FEMA and the NRC in the last three "graded" exercises. We could not have done it without KMKS. They are good citizens.

KMKS proved their worth and willingness last year during Hurricane Frances. They broadcast our bulletins and advisories immediately and repeatedly at all hours of the day and night. They are located only about two blocks from our emergency operations center and when telephone lines go down (simulated or for real) a runner can easily deliver for broadcast our warnings and recommendations for evacuation. This would not be possible if the station were located in Wharton County.

Over the years our citizenry has been schooled time and time again to tune to 102.5 FM for emergency bulletins and recommendations. Brochures, calendars, school material, training manuals, etc., etc. are full of 102.5 FM. That frequency has been purposefully ingrained in the minds of the residents of this county just as 121.5 is ingrained in the minds of pilots and mariners. Within a 10 mile radius of the nuclear plant there are hundreds of "tone-alert" radios (one for every residence or business) with 102.5 FM as a fixed frequency to alert our residents of any emergency.

For these reasons and others I strongly oppose the removal of 102.5 FM from Bay City and respectfully request you deny the pending application of Prawn Broadcasting Company.

Respectfully submitted,



Bert L. Huebner
Former County Judge of
Matagorda County, Texas

BLH/do

cc: The Honorable Kay Bailey Hutchison
The Honorable Phil Gramm
The Honorable Ron Paul
KMKS 102.5 FM

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