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April 9, 1999

98-223

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Portals II Building, TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

Re: MM Docket No. 99-98
RM-9483
Judsonia, Arkansas

Dear Ms. Salas:

On behalf of Woodruff County Broadcasting, we are herewith filing an original and four (4) copies of its "Comments in Rulemaking" in the above-referenced rulemaking docket.

Should any questions arise with respect to this matter, please contact the undersigned counsel.

Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER, LLP

By: 
Allan G. Moskowitz

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER, LLP

Ms. Magalie Roman Salas
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bcc: Mr. Michael A. Kaneb
Mr. Jefferson G. Brock

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of)	
)	MM Docket No. 98-223
Amendment of Section 73.202(b),)	RM-9340
Table of Allotments,)	RM-9481
FM Broadcast Stations.)	RM-9482
(Cherry Valley, Arkansas;)	
Cotton Plant, Arkansas;)	MM Docket No. 99-98
Judsonia, Arkansas))	RM-9483

TO: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COMMENTS IN RULEMAKING

Woodruff County Broadcasting ("Woodruff"), by its counsel, is herewith submitting comments, pursuant to the Commission's Notice of Proposed Rule Making (DA 99-629), released April 2, 1999, seeking comments regarding the proposed allotment of Channel 237A to Judsonia, Arkansas, as that community's first local aural service. In support thereof, the following is respectfully shown:

BACKGROUND

1. On February 17, 1999, the Commission issued a Public Notice announcing that the proposal of Woodruff County Broadcasting to allocate Channel 257A to Cotton Plant, Arkansas, RM-9481, and the proposal of Bobby Caldwell to allocate Channel 257A to Cotton Plant, Arkansas, RM-9482, would be treated as counterproposals in MM Docket No. 98-223, wherein ALALATEX Broadcasters proposed the allotment of Channel 257A to Cherry Valley, Arkansas. The Commission indicated that reply comments to the counterproposal should be

submitted in that docket no later than 15 days after the date of the Public Notice, i.e., March 4, 1999. On March 5, 1999, ALALATEX filed its reply comments, albeit late-filed.

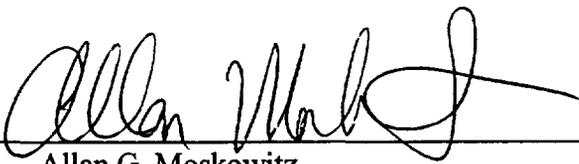
2. ALALATEX's reply comments proposed that since only Channel 257A could be allotted to Cherry Valley, Arkansas, the Commission should allot Channel 237A at Cotton Plant, Arkansas.

3. As indicated by the Commission's Notice of Proposed Rule Making in MM Docket No. 99-98, Channel 237A is unavailable for allotment at Cotton Plant, Arkansas, in that on February 1, 1999, prior to the filing of ALALATEX's reply comments in MM Docket No. 98-223, White County Broadcasters proposed the allotment of Channel 237A to Judsonia, Arkansas.

4. Since the comment and reply dates in MM Docket 98-223 have passed, Woodruff County Broadcasting, in an abundance of caution, is filing these comments in this Docket in order to put these facts on record and the parties on notice.

Respectfully submitted,

WOODRUFF COUNTY BROADCASTING

By: 
Allan G. Moskowitz
Its Attorney

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April 9, 1999

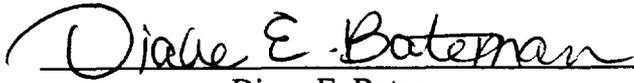
CERTIFICATE OF SERVICE

I, Diane E. Bateman, of the law firm Kaye, Scholer, Fierman, Hays & Handler, LLP, do hereby certify that on this 9th day of April, 1999, a copy of the foregoing "Comments in Rulemaking" was sent via First Class U.S. Mail, postage prepaid, to the following:

John A. Karousos *
Chief, Allocations Branch
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Federal Communications Commission
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Diane E. Bateman

* Via Hand-Delivery