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April 13, 1999

**VIA HAND DELIVERY**

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

Mail Stop: 1800D5

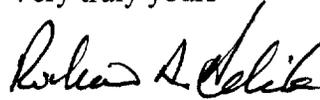
Re: **MM Docket No. 99-26**  
**RM-9436**

Dear Ms. Salas

Submitted on behalf of Tichenor License Corporation, licensee of FM Broadcast Stations KOVA, Rosenberg, Texas, and KLTO, Galveston, Texas, are an original and four copies of its Reply Comments relating to the above-captioned rule making proceeding to amend the Table of Allotments for FM Broadcast Stations, Section 73.202 (b) of the Rules.

Any questions concerning this matter should be addressed to undersigned counsel.

Very truly yours



Richard A. Helmick

Enclosures

cc w/encl.: Henry E. Crawford, Esq.  
F. Joseph Brinig, Esq.

No. of Copies rec'd 024  
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# ORIGINAL

BEFORE THE

## Federal Communications Commission

In the Matter of )  
 )  
Amendment of Section 73.202 (b), )  
Table of Allotments, FM Broadcast Stations )  
(Pitkin, Louisiana )

MM Docket No. 99-26  
RM-9436

**RECEIVED**  
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To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

### REPLY COMMENTS OF TICHENOR LICENSE CORPORATION

Tichenor License Corporation (Tichenor), by its counsel, pursuant to Sections 1.415 and 1.419 of the Commission's Rules, hereby submits its reply comments in the above-captioned proceeding and in support thereof, sets forth the following.

1. Background. On February 5, 1999, the Commission released a Notice of Proposed Rule Making (DA 99-269) (NPRM) in the above-captioned proceeding in response to a petition for rule making (RM-9436) of Panther Broadcasting of Louisiana (Panther) which proposed to allot FM Channel 285A to Pitkin, Louisiana, as that community's first local aural transmission service. Since Pitkin is neither incorporated nor listed in the U.S. Census, Panther was directed by the Commission to provide additional information evidencing that Pitkin is entitled to community status. However, Panther did not file any comments supporting the NPRM or provide any evidence as to the community status of Pitkin; accordingly, its proposal to allocate Channel 285A to Pitkin must be denied.

2. Counterproposals. Two counterproposals, one by Tichenor and the other by Arkansas Wireless Co. (Wireless), were filed in response to the above-captioned NPRM. Tichenor, the licensee of FM Broadcast Stations KOVA, Rosenberg, Texas, and KLTO, Galveston, Texas, proposed to a) upgrade KOVA from Channel 285A to Channel 285C3 and change KOVA's city of license from Rosenberg (1990 U.S. Census population, 20,183) to Missouri City, Texas (1990 U.S. Census population, 36,176), to provide Missouri City with a first local aural transmission service, b) move KLTO from Channel 285A to 287A and change its city of license from Galveston (1990 U.S. Census population, 59,070) to Crystal Beach, Texas (an unincorporated resort community with a population of approximately 700 with additional thousands of tourists during the summer season) to provide Crystal Beach with a second local service, and c) with the consent of KZWA, Lake Charles, Louisiana (1990 U.S. Census population, 70,580), move KZWA from Channel 287C2 to 285C3 and change its city of license from Lake Charles to Moss Bluff, Louisiana (a Census Designated Place, 1990 U.S. Census population, 8,039, within the Lake Charles Urbanized Area), to provide Moss Bluff with a first local service. Effecting Tichenor's counterproposal would leave Rosenberg, Texas, with one local radio service, Galveston, Texas, with three local services, and Lake Charles, Louisiana, with seven local services.

3. Wireless' counterproposal would allot Channel 285A to Reeves, Louisiana, a census-designated place (1990 U.S. Census population, 188), to provide that community with a first local service. Wireless asserts that the population of Reeves "has grown significantly over the past several years; however, based on updated information, set forth as Attachment A, it is estimated that the current population of Reeves is 198, an increase of only 10 persons (5%) since the 1990 census.

For reasons which will be set forth below, Tichenor submits that Reeves is not a community for allocation purposes and that, in any event, as between the Tichenor and Wireless counterproposals, the Tichenor counterproposal would better serve the public interest and should be preferred.

4. Discussion. As set forth in Attachment A, Reeves, Louisiana, referred to by Wireless as a “census-designated village,” consists of approximately 89 families in an area comprising only 6.23 sq. kilometers. Although Reeves has a mayor-council form of government and a police and fire chief, there is no indication, and Wireless has presented no evidence, that Reeves provides any municipal services to its residents; for example, while Reeves High School is located in Reeves, it is part of the Allen County School District and serves the county and not just Reeves. Wireless has made no showing as to other indicia of community status, such as, for example, commercial, social or religious organizations, and that such organizations and businesses, if any, are intended to principally serve Reeves as opposed to other surrounding areas. See, e.g., Columbia, California, 6 FCC Rcd 3292, 69 RR2d 606 (Mass Media Bureau 1991); Aguila, Arizona, 6 FCC Rcd 4278, 69 RR2d 893 (Mass Media Bureau 1991).

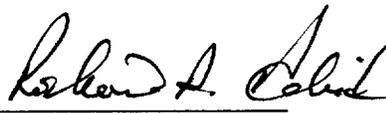
5. Simply stated, Wireless has made no showing whatsoever to the Commission to support a finding that Reeves is a community for allocation purposes and, accordingly, its counterproposal must be denied. However, even if the Commission were to find that Reeves is a community for allocation purposes, Tichenor’s counterproposal must be preferred over the counterproposal of Wireless as it would best serve the public interest. Tichenor has demonstrated that Missouri City is sufficiently independent of the Houston Urbanized Area to merit a first local transmission service; moreover, the proposed Missouri City allocation would provide a 70 dBu signal to less than 30% of the Houston Urbanized Area which also evidences that Missouri City

qualifies for a first local service preference. See, e.g., Las Piedras, Puerto Rico, 11 FCC Rcd 16392, 5 CR 836 (Mass Media Bureau 1996). Finally, Tichenor's counterproposal to, in part, allocate 285C3 to Missouri City, Texas, as a first local transmission service would result in a net service gain to 1,858,461 people in an area of 3,691 sq. kilometers; although 44,784 persons in an area of 689 sq. kilometers would lose service, the area gained is more than five times larger than the area lost and the loss area would continue to receive sufficient radio service.

6. Tichenor's counterproposal can be fully implemented in compliance with the Commission's minimum distance separation requirements. Set forth as Attachment B is a supplemental Engineering Statement of Louis Robert du Treil, Jr. supporting such counterproposal.

Respectfully submitted

TICHENOR LICENSE CORPORATION

By: 

Roy R. Russo  
Richard A. Helmick

COHN AND MARKS  
1920 N Street, N.W.  
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Washington, D.C. 20036

Its Attorneys

April 13, 1999

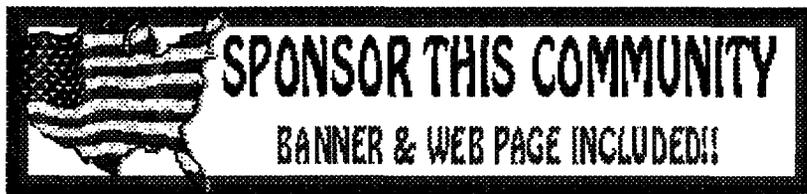
**ATTACHMENT A**

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<i>Reeves, Louisiana</i>	
<b>Website</b>	
<b>Email</b>	
<b>Postal Address</b>	P. O. Box 119
<b>City</b>	Reeves
<b>Zip Code</b>	70658
<b>Phone</b>	318-666-2613
<b>Fax</b>	
<b>Parish</b>	Allen
<b>Charter</b>	Lawrason
<b>Meeting Date</b>	1st Wed, 6 pm
<b>Court</b>	Mayor's
<b>LMA District</b>	
<b>Term Expires</b>	12/31/98
<b>Population</b>	198
<b>Mayor</b>	Nettie Heintz
<b>Title</b>	Mayor
<b>Police Chief</b>	Glenn Kennedy
<b>Fire Chief</b>	W. E. Reeves, Jr.
<b>Clerk</b>	Kamela Henagan
<b>City Attorney</b>	
<b>Titles</b>	Aldermen
<b>Council Members</b>	Jean Markway Sampson Pitre Shelley Tyler

					
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\*\*\*\*

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# Welcome to Reeves

## Louisiana

Zip Code

The Louisiana state capital is Baton Rouge.

### What would you like to know about Reeves

Statistics & Facts

### Zip Codes

70658

Return to Index

### Statistics & Facts

The population of Reeves is approximately 188.  
The approximate number of families is 89.

The amount of land area in Reeves is 6.23 sq. kilometers.  
The amount of surface water is 0 sq kilometers.  
The distance from Reeves to Washington DC is 1099 statute miles. The distance to the Louisiana state capital is 115 statute miles. (Statute miles are "as the crow flies")  
Reeves is positioned 30.51 degrees north of the equator and 93.04 degrees west of the prime meridian.

**Louisiana Department of Education**

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**Public Schools by School District**

School District	School Name	Address	Principal	Phone	Fax
Allen	Elizabeth High School	P.O. BOX 580, ELIZABETH, LA 70638	Mr. Larry Crawford	(318)634-5341	(318)634-5218
Allen	Fairview High School	P.O. BOX 216, GRANT, LA 70644	Mr. Wayne Cloud	(318)634-5354	(318)634-5357
Allen	Kinder Elementary School	P.O. BOX 610, KINDER, LA 70648	Mr. Dempsey Keel	(318)738-2454	(318)738-5526
Allen	Kinder High School	145 HWY 383, KINDER, LA 70648	Mr. Charles Nevils	(318)738-2886	(318)738-5665
Allen	Oakdale Elementary School	340 NORTH LOOP, OAKDALE, LA 71463	Ms. Charity Monk	(318)335-0690	(318)335-2823
Allen	Oakdale High School	101 SOUTH 13TH STREET, OAKDALE, LA 71463	Mr. Danny Hindmon	(318)335-2338	(318)335-3257
Allen	Oakdale Junior High School	124 SOUTH 13TH STREET, OAKDALE, LA 71463	Ms. Karen Reed	(318)335-1558	(318)335-4690
Allen	Oberlin Elementary School	P.O. DRAWER E, OBERLIN, LA 70655	Mr. Ronald Meaux	(318)639-2241	(318)639-5561
Allen	Oberlin High School	P.O. DRAWER D, OBERLIN, LA 70655	Ms. Barbara Lee	(318)639-4341	(318)639-2508
Allen	Reeves High School	P.O. BOX 100, REEVES, LA 70658	Mr. Donald Bennett	(318)666-2414	(318)666-2812

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**ATTACHMENT B**

ENGINEERING STATEMENT  
IN SUPPORT OF REPLY  
TICHENOR LICENSE CORPORATION

This Engineering Statement was prepared on behalf of Tichenor License Corporation ("TLC") in support of a Reply in MM Docket No. 99-26. This Engineering Statement provides a revised showing of other aural services concerning the TLC counterproposal.

The Engineering Statement supporting the TLC Comments and Counterproposal in MM Docket No. 99-26 dated March 29, 1999, included a showing of other aural services to the 60 dBu gain/loss areas of the proposal. The calculation of other FM aural services was based on the use of actual licensed FM facilities. However, the Commission guidelines for calculating other FM services is to employ 60 dBu (1 mV/m) circles based on the reference distance this contour for the station class maximum. For Class C facilities, the minimum facility is employed, except when greater actual facilities exist. For example, all Class A stations would employ a 60 dBu reference distance of 28 km. Also, vacant allotments and construction permits are considered in such a showing.<sup>†</sup>

This Engineering Statement provides a showing of other aural services strictly based on the FCC guidelines as described above. Figures 9A and 10A are maps showing the predicted 60 dBu gain/loss areas and other fulltime aural services. Numbers on the maps indicate the number of other fulltime aural services available to a given sector. There are more than five other aural services available throughout the entire existing and proposed 60 dBu service areas of the Missouri City and Crystal Beach proposals.

---

<sup>†</sup> See, for example, *Notice of Proposed Rule Making*, MM Docket No. 96-219, Released: November 1, 1996, 11 FCC Rcd 20388.

The Moss Bluff proposal involves an area where there are as few as three other fulltime aural services. However, the three-service area is entirely over water. In the Moss Bluff 60 dBu service loss area there is an area with four other fulltime aural services that includes a population of 415. However, this four-service area in the 60 dBu loss area is largely offset by service to a four-service area with a population of 370 in the 60 dBu gain area. The table below summarizes the breakdown of other aural services for the TLC counterproposal:

<b>Subject Area</b>	<b>Area (sq. km)</b>	<b>Population (1990)</b>
<u>Missouri City Proposal</u>		
Net +1 aural services	3,691	1,858,461
5+ other aural services	3,691	1,858,461
Net -1 aural service	689	44,784
5+ other aural services	689	44,784
<u>Crystal Beach Proposal</u>		
Net +1 aural services	1,507	1,768
5+ other aural services	1,507	1,768
Net -1 aural service	849	105,225
5+ other aural services	849	105,255
<u>Moss Bluff Proposal</u>		
Net +1 aural service	2,662	17,307
5+ other aural services	2,622	16,937
4 other aural services	40	370
Net -1 aural service	6,143	180,640
5+ other aural services	5,977	180,225
4 other aural services	97	415
3 other aural services	69	0
<u>Totals for Entire Proposal</u>		
Net +1 aural services	7,860	1,877,536
5+ other aural services	7,820	1,877,166
4 other aural services	40	370
Net -1 aural service	7,681	330,649
5+ other aural services	7,515	330,234
4 other aural services	97	415
3 other aural services	69	0

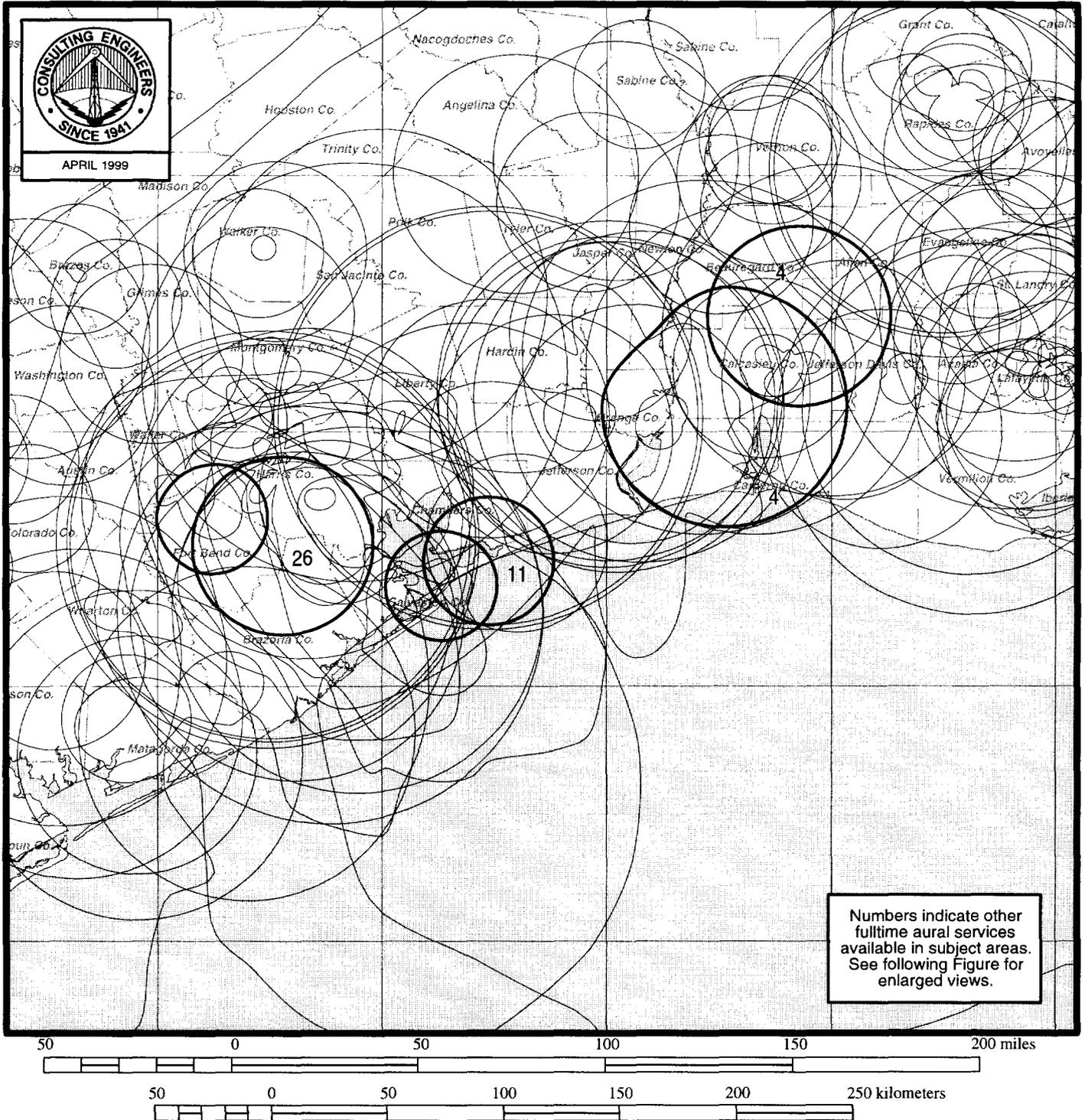
Figure 11A is a tabulation of all stations considered in the analysis of other fulltime aural services.



Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, Florida 34237  
(941)329-6000

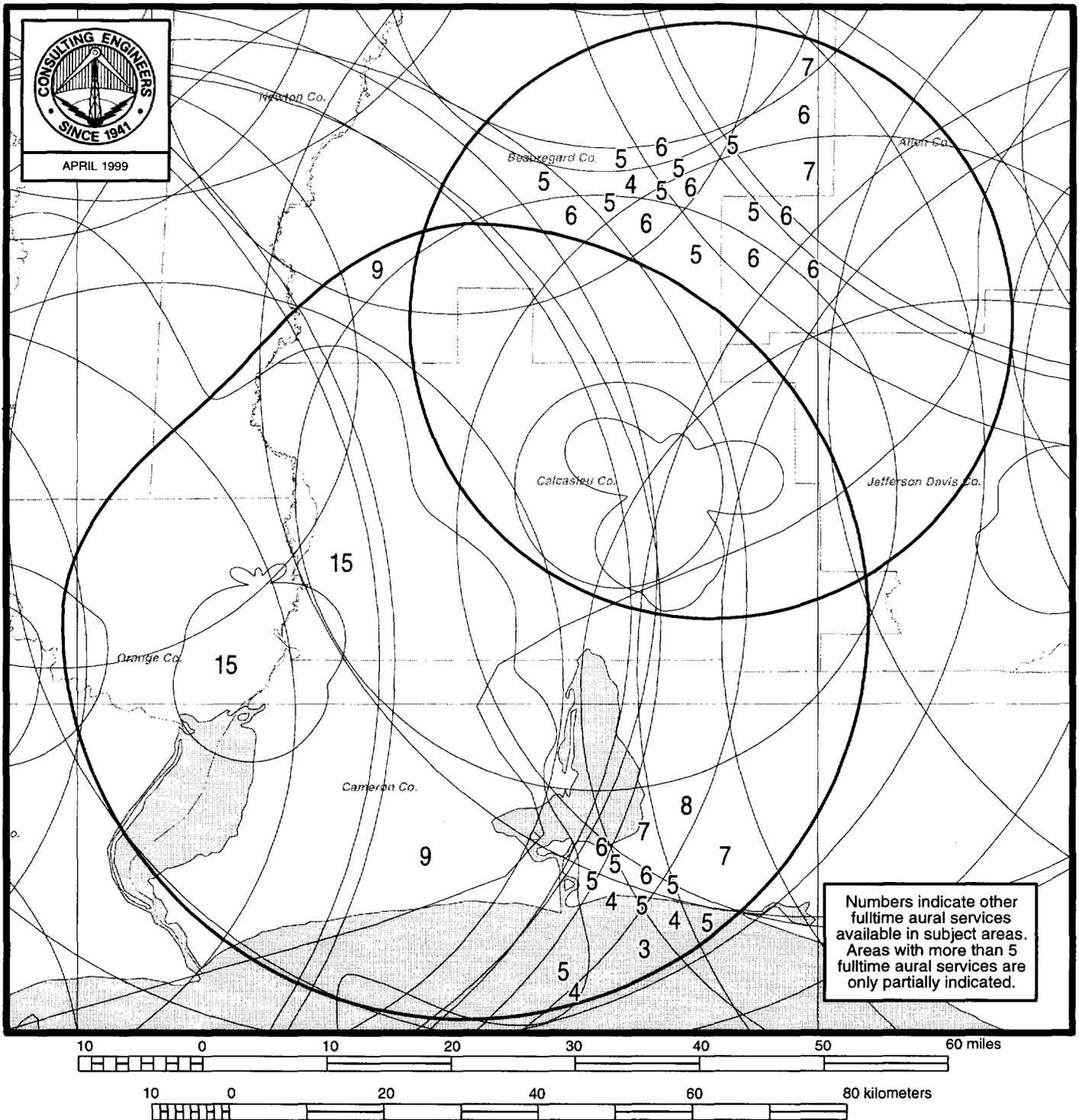
April 9, 1999



# OVERVIEW OF OTHER AURAL SERVICES TO GAIN/LOSS AREAS

TICHENOR LICENSE CORPORATION

du Treil, Lundin & Rackley, Inc. Sarasota, Florida



**OTHER AURAL SERVICES TO GAIN/LOSS AREAS  
(ENLARGED VIEW OF MOSS BLUFF PROPOSAL)**

**TICHENOR LICENSE CORPORATION**

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

ENGINEERING STATEMENT  
IN SUPPORT OF REPLY  
TICHENOR LICENSE CORPORATION

Tabulation of Fulltime Stations Considered in Study of  
Other Aural Services in Subject Gain/Loss Areas

ID	Station
<b>AM Stations (nighttime interference-free contour)</b>	
1	KLVI, Beaumont, TX, 560 kHz (4.4 mV/m)
2	KLBJ, Austin, TX, 590 kHz (7.8 mV/m)
3	KILT, Houston, TX, 610 kHz (8.3 mV/m)
4	KSEV, Tomball, TX, 700 kHz (12.7 mV/m)
5	KTRH, Houston, TX, 740 kHz (6.9 mV/m)
6	KBME, Houston, TX, 790 kHz (8.2 mV/m)
7	WBAP, Fort Worth, TX, 820 kHz (0.5 mV/m)
8	WWL, New Orleans, LA, 870 kHz (0.5 mV/m)
9	KJOJ, Conroe, TX, 880 kHz (12.9 mV/m)
10	KYST, Texas City, TX, 920 kHz (24.2 mV/m)
11	KPRC, Houston, TX, 950 kHz (3.5 mV/m)
12	KRTX, Rosenberg-Richmond, TX, 980 kHz (21.4 mV/m)
13	KLAT, Houston, TX, 1010 kHz (12.9 mV/m)
14	KENR, Houston, TX, 1070 kHz (14.5 mV/m)
15	KRLD, Dallas, TX, 1080 kHz (0.5 mV/m)
16	KGOL, Humble, TX, 1180 kHz (9.7 mV/m)
17	WOAI, San Antonio, TX, 1200 kHz (0.5 mV/m)
18	KFCC, Bay City, TX, 1270 kHz (6.2 mV/m) (license revoked; on appeal)
19	KXYZ, Houston, TX, 1320 kHz (4.3 mV/m)
20	KCOH, Houston, TX, 1430 kHz (27.8 mV/m)
21	KAYD, Beaumont, TX, 1450 kHz (19.5 mV/m)
22	KLCL, Lake Charles, LA, 1470 kHz (5.6 mV/m)
23	KLVL, Pasadena, TX, 1480 kHz (6.4 mV/m)
24	KANI, Wharton, TX, 1500 kHz (8.2 mV/m)
25	KGBC, Galveston, TX, 1540 kHz (5.1 mV/m)
26	KXZZ, Lake Charles, LA, 1580 kHz (9.6 mV/m)
27	KYOK, Houston, TX, 1590 kHz (6.5 mV/m)
28	KOGT, Orange, TX, 1600 kHz (11.9 mV/m)

ID	Station
<b>FM Stations</b>	
1	KROK, De Ridder, LA, Channel 221C3
2	KLIL, Moreauville, LA, Channel 221A
3	KTSR, College Station, TX, Channel 221A
4	KRTS, Seabrook, TX, Channel 221C1
5	KMIA, New Ulm, TX, Channel 222A
6	KVPIFM, Ville Platte, LA, Channel 223A
7	KTFA, Groves, TX, Channel 223C2
8	KGFJ, Markham, TX, Channel 223A
9	KMBV, Navasota, TX, Channel 223A
10	KJAE, Leesville, LA, Channel 224A
11	KJEFFM, Jennings, LA, Channel 225C2
12	KKBQFM, Pasadena, TX, Channel 225C
13	KOVEFM, Port Arthur, TX, Channel 227C
14	KKRW, Houston, TX, Channel 229C
15	KFAD, Alexandria, LA, Channel 230A
16	KQXYFM, Beaumont, TX, Channel 231C1
17	KULF, Brenham, TX, Channel 231C3
18	KSMB, Lafayette, LA, Channel 233C
19	KLDE, Houston, TX, Channel 233C
20	KVLLFM, Woodville, TX, Channel 234C2
21	KYKR, Beaumont, TX, Channel 236C
22	KRRQ, Lafayette, LA, Channel 238C2
23	Allot, South Fort Polk, LA, Channel 239A
24	KIKKFM, Houston, TX, Channel 239C
25	Allot, Mansura, LA, Channel 240A
26	KYKZ, Lake Charles, LA, Channel 241C
27	KGUL, Edna, TX, Channel 241C3
28	KFTE, Breaux Bridge, LA, Channel 243C2
29	KHMx, Houston, TX, Channel 243C
30	KZMZ, Alexandria, LA, Channel 245C
31	KIOXFM, El Campo, TX, Channel 245C1
32	KKTL, Cleveland, TX, Channel 246C
33	KMDL, Kaplan, LA, Channel 247C2
34	KAYDFM, Beaumont, TX, Channel 248C1
35	KAPBFM, Marksville, LA, Channel 249A
36	KBXX, Houston, TX, Channel 250C
37	KULMFM, Columbus, TX, Channel 252A
38	KTJM, Port Arthur, TX, Channel 253C
39	KKST, Oakdale, LA, Channel 254C1
40	KXKC, New Iberia, LA, Channel 256C
41	KODA, Houston, TX, Channel 256C
42	KHLA, Lake Charles, LA, Channel 258C
43	KUST, Huntsville, TX, Channel 259C3
44	KKOS, Palacios, TX, Channel 259C2
45	KTDY, Lafayette, LA, Channel 260C

ID	Station
46	KTXM, Hallettsville, TX, Channel 260A
47	KSHN, Liberty, TX, Channel 260C2
48	KRRVFM, Alexandria, LA, Channel 262C
49	KILTFM, Houston, TX, Channel 262C
50	KRTXFM, Winnie, TX, Channel 264C
51	KBON, Mamou, LA, Channel 266C3
52	KLOL, Houston, TX, Channel 266C
53	KKGB, Sulphur, LA, Channel 267C3
54	KSTB, Crystal Beach, TX, Channel 268C3
55	KEAZ, De Ridder, LA, Channel 269A
56	KXGJ, Bay City, TX, Channel 269C1
57	KSAMFM, Huntsville, TX, Channel 269A
58	KWDX, Silsbee, TX, Channel 269C3
59	KQIS, Basile, LA, Channel 271C1
60	KMJQ, Houston, TX, Channel 271C
61	KBCE, Boyce, LA, Channel 272C3
62	KMKS, Bay City, TX, Channel 273C1
63	KTCX, Beaumont, TX, Channel 273C2
64	KWYX, Jasper, TX, Channel 274C2
65	KAJNFM, Crowley, LA, Channel 275C
66	KLTN, Houston, TX, Channel 275C
67	KJOJFM, Freeport, TX, Channel 277C
68	KLAA, Tioga, LA, Channel 278C2
69	KBIU, Lake Charles, LA, Channel 279C1
70	KVST, Willis, TX, Channel 279C3
71	Allot, Hemphill, TX, Channel 280A
72	KRBFBM, Houston, TX, Channel 281C
73	KEZP, Bunkie, LA, Channel 282C3
74	KKMY, Orange, TX, Channel 283C1
75	KNEKFM, Washington, LA, Channel 284C3
76	KBUK, La Grange, TX, Channel 285A
77	KPEL, Abbeville, LA, Channel 286C3
78	KEZB, Hempstead, TX, Channel 287C3
79	KHFX, Ball, LA, Channel 288A
80	KJJB, Eunice, LA, Channel 288A
81	KVVP, Leesville, LA, Channel 289C3
82	KHCBFM, Houston, TX, Channel 289C
83	KVOLFM, Opelousas, LA, Channel 290A
84	KTTX, Brenham, TX, Channel 291C2
85	KIOC, Orange, TX, Channel 291C
86	KFXZ, Maurice, LA, Channel 292A
87	KQQK, Galveston, TX, Channel 293C
88	KCIJ, North Fort Polk, LA, Channel 294A
89	KLWFM, Rayne, LA, Channel 294A
90	KEDG, Alexandria, LA, Channel 295A
91	KKHT, Conroe, TX, Channel 295C
92	KWLV, Many, LA, Channel 296C3

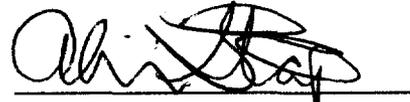
ID	Station
93	KOGM, Opelousas, LA, Channel 296A
94	KJAS, Jasper, TX, Channel 297C3
95	KRAW, Lake Arthur, LA, Channel 298C2
96	KTBZ, Lake Jackson, TX, Channel 298C
97	KRXZ, Erath, LA, Channel 300C1
98	KXTJ, Beaumont, TX, Channel 300C

**CERTIFICATE OF SERVICE**

I, Alicia A. Staples, hereby certify that on April 13, 1999, a copy of the foregoing "Reply Comments of Tichenor License Corporation" was sent by First Class mail, postage prepaid, to the following:

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1150 Connecticut Avenue, N.W.  
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Counsel for Panther Broadcasting of Louisiana

F. Joseph Brinig, Esq.  
1427 Dolley Madison Boulevard  
McLean, Virginia 22101  
Counsel for Arkansas Wireless Co.

  
Alicia A. Staples