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July 19, 1999

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**VIA HAND DELIVERY**

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

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JUL 19 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: In the Matter of Amendment of Section 73.202(b), Table of Allotments,  
FM Broadcast Stations  
Carmel Valley, California  
MM Docket No. 99-171, RM-9574**

Dear Ms. Salas:

On Behalf of Buckley Communications, Inc. and Buckley Broadcasting Corporation of Monterey, Inc., the respective licensees of KIDD(AM) and KWAV(FM), Monterey, California (collectively, "Buckley"), this letter is being filed in response to the Petition for Rule Making that was filed by Mountain West Broadcasting ("Mountain West") in the above-referenced docket requesting an amendment of the FM Table of Allotments to allot FM Channel 290A (105.9 Mhz) to Carmel Valley, California (the "Petition"). In its review of the Petition, Buckley noted factual inaccuracies and mischaracterizations which it is bringing to the Commission's attention to correct the record in this proceeding.

Specifically, in its Petition, Mountain West erroneously claims that the allotment of Channel 290A to Carmel Valley would result in the first local broadcast facility to the "community and/or surrounding area." See the Petition, para. 3. Mountain West further claims that "there [are] no AM or FM broadcast facilities within 19 kilometers of Carmel Valley" and that Carmel Valley is without local FM service. See the Petition, para. 4. Contrary to these contentions, Carmel Valley - a nonincorporated community of only 4,500 persons - currently has its very own local transmission service. In fact, KIEZ(AM), the full-time AM radio operating at 540 kHz in Carmel Valley, has been authorized by the Commission to increase its facilities to improve its service to the community. See FCC File No. BP-981211AB. In addition, there are more than 26 (9 AM and 17 FM) full service radio stations and several FM translator stations licensed within the immediately surrounding area, see Attachment 1, as well as several additional stations from more distant communities, which cover Carmel Valley. The local stations, including the two local Buckley stations, provide news and public affairs programming that more than adequately serve the residents of Carmel Valley. Accordingly, Mountain West's

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representations regarding coverage of and service to Carmel Valley mischaracterize the true nature of broadcast service to the community.

It was also noted that Mountain West has not shown that its proposal satisfies any of the Commission's FM allotment priorities. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (June 2, 1982).

It is hereby respectfully requested that the Commission take notice of the matters addressed in this letter and take any necessary measures to correct the record in this proceeding accordingly. If there should be any questions or if Buckley can be of further assistance in this matter, please do not hesitate to contact the undersigned.

Very truly yours,

  
Colette M. Capretz

CMC:ch  
cc: Nancy Joyner (w/encl.)

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## ATTACHMENT 1

### **AM Radio Stations**

KRML(AM), Carmel, California	1410 kHz
KIDD(AM), Monterey, California	630 kHz
KNRY(AM), Monterey, California	1240 kHz
KCTY(AM), Salinas, California	980 kHz
KTOM(AM), Salinas, California	1380 kHz
KTXS(AM), Salinas, California	1460 kHz
KTGE(AM), Salinas, California	1570 kHz
KKMC(AM), Gonzales, California	880 kHz
KVRG(AM), Soledad, California	700 kHz

### **FM Radio Stations**

KBOQ(FM), Carmel, California	95.5 Mhz
KBTU(FM), Carmel, California	101.7 Mhz
KWAV(FM), Monterey, California	96.9 Mhz
KISE(FM), Seaside, California	103.9 Mhz
KVRG-FM, Seaside, California	107.1 Mhz
KSPB(FM), Pebble Beach, California	91.9 Mhz
KLXM(FM), Salinas, California	97.9 Mhz
KTOM-FM, Salinas, California	100.7 Mhz
KDON-FM, Salinas, California	102.5 Mhz
KRAY-FM, Salinas, California	103.5 Mhz
KMBY-FM, Gonzales, California	104.3 Mhz
KFRS(FM), Soledad, California	89.9 Mhz
KLUE(FM), Soledad, California	106.3 Mhz
KHDC(FM), Chualar, California	90.9 Mhz
KAZU(FM), Pacific Grove, California	90.3 Mhz
KOCN(FM), Pacific Grove, California	105.1 Mhz
KRQC-FM, Marina, California	92.7 Mhz

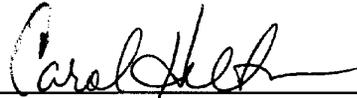
### **FM Translator Stations**

K260AA, Carmel Valley, California	99.9 Mhz
K208CW, Monterey, California	89.5 Mhz
K291AE, Seaside, California	106.1 Mhz
K217CQ, Salinas, California	91.3 Mhz
K240AH, Salinas, California	95.9 Mhz
K252CK, Salinas, California	93.3 Mhz
K254AG, Gonzales, California	98.7 Mhz
K210CA, Soledad, California	89.9 Mhz
K236AJ, Soledad, California	95.1 Mhz
K240AK, Soledad, California	95.9 Mhz
K290AE, Big Sur Valley, California	105.9 Mhz

**CERTIFICATE OF SERVICE**

I, Carol Hilton, do hereby certify that I have this 19th day of July, 1999, mailed by first-class United States mail, postage prepaid, copies of the foregoing to Magalie Roman Salas of the Federal Communications (letter dated July 19, 1999) Re: In the matter of Amendment of section 73.202(b), Table of Allotments, FM Broadcast Stations, Carmel Valley, California, MM Docket No. 99-171, RM 9574 to the following:

Victor A. Michael, Jr., President  
Mountain West Broadcasting  
6807 Foxglove Drive  
Cheyenne, WY 82009



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Carol Hilton