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ADMITTED IN  
SOUTH CAROLINA  
NORTH CAROLINA

PRACTICE LIMITED TO  
MATTERS BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION

December 15, 1999

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**VIA FEDERAL EXPRESS**

Magalie Roman Salas, Esquire  
Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street  
Washington, DC 20554

**FCC MAIL ROOM**

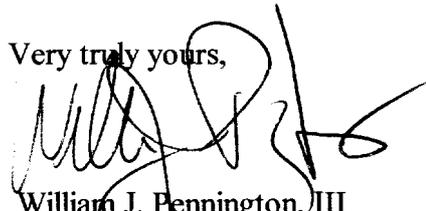
RE: Comments  
MM Docket No. 99-321  
Grand Isle and Empire, Louisiana

Dear Ms. Salas:

Transmitted herewith on behalf of Blue Dolphin Communications, Inc., are an original and four copies of its Comments, filed in the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate directly with the undersigned.

Very truly yours,



William J. Pennington, III  
COUNSEL TO BLUE DOLPHIN  
COMMUNICATIONS, INC.

Enclosure  
cc(w/encl.): Certificate of Service (by first-class mail)

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Before the  
FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

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In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No. 99-321
Table of Allotments	)	RM-9733
FM Broadcast Stations	)	
(Grand Isle and Empire, Louisiana	)	

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

COMMENTS OF BLUE DOLPHIN COMMUNICATIONS, INC.

Blue Dolphin Communications, Inc., (hereinafter "Blue Dolphin"), permittee of FM Station KBIL at Grand Isle, Louisiana, by their counsel, respectfully submits their Comments in the above captioned proceeding seeking to substitute Channel 283C2 for Channel 283A, change community of allotment from Grand Isle to Empire, Louisiana so as to provide a first local service to that community, and modify the outstanding construction permit accordingly.

In support of these changes in the FM Table of Allotments, the following information is respectfully submitted:

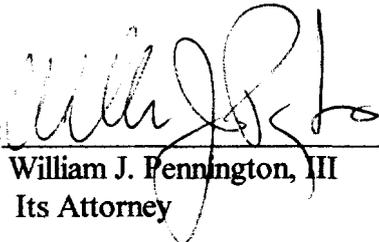
1. Blue Dolphin incorporates by reference the information set forth in their original Petition for Rule Making.
2. Blue Dolphin reinstates its intention to apply for a construction permit for the facility changes for Station KBIL(FM) if the requested changes in the Table of FM Allotments are

effectuated. Upon the grant of a construction permit, Blue Dolphin will promptly construct the Station KBIL(FM) facility changes.

**NOW THEREFORE**, based upon the foregoing, Blue Dolphin Communications, Inc. requests that the Commission modify the FM Table of Allotments to substitute Channel 283C2 for Channel 283A, change the community of allotment from Grand Isle to Empire, Louisiana and modify the outstanding construction permit accordingly.

Respectfully submitted,

**BLUE DOLPHIN COMMUNICATIONS, INC.**

By:   
\_\_\_\_\_  
William J. Pennington, III  
Its Attorney

William J. Pennington, III  
Attorney at Law  
Post Office Box 403  
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(413 562-3341

Dated: December 13, 1999