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Of Counsel

Putbrese, Hunsaker & Trent

June 30, 2000

**Re: Reply Comments on
Notice of Proposed Rulemaking
MM Docket No. 00-69; RM 9850
Cheboygan and Rogers City, MI
DBMPC #15170**

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325
Washington, DC 20024

VIA FEDERAL EXPRESS

Dear Ms. Salas:

On behalf of Escanaba License Corp., Petitioner in the above-referenced Rule Making Proceeding, there are transmitted herewith the Petitioners' Reply Comments in compliance with the Commission's Rules, and the Commission's directives in the above-referenced Rule Making proceeding.

Should there be any question regarding the attached Reply Comments, please contact undersigned Counsel for Escanaba License Corp.

Very truly yours,


Denise B. Moline

DBM:wp
Attachment

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

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In the Matter of)
)
Amendment of Section 73.202(b)) **MM Docket No. 00-69**
Table of Allotments,) **RM 9850**
FM Broadcast Stations)
(Cheboygan and Rogers City, MI))

To: Chief, Allocations Branch

REPLY COMMENTS ON NOTICE OF PROPOSED RULE MAKING

Escanaba License Corp., (“Escanaba”) Petitioner in the above-captioned Docket Proceeding, by Counsel, and pursuant to Section 1.415 of the Commission’s Rules (47 C.F.R. §1.415), hereby respectfully submits its Reply Comments on the Notice of Proposed Rule Making (“NPRM”) in continuing support of the proposed allotment of Channel 260C2 at Cheboygan, Michigan, as a second local FM service, and substitution of Channel 292C2 for Channel 260C2 at Rogers City, Michigan.

Northern Radio Network Corporation (“NRN”), Licensee of Station WHAK-FM, Rogers City, MI, submitted a Counterproposal, indicating that it did not wish to have its frequency modified. NRN cited disruption in station operations, confusion to the listening audience, and significant costs in connection with the proposed frequency substitution. Escanaba has already committed to payment or reimbursement of costs to WHAK-FM in connection with the frequency substitution, and NRN’s speculation that reimbursement “is very likely to take an appreciable period of time” is completely unwarranted. Frequency substitution should not cause significant

disruption in station operations, and audience confusion is easily remedied through advance promotion of the new frequency. NRN's concerns are thus easily remedied.

Escanaba prefers its own original allotment proposal. NRN's alternative allotment would provide a lower-grade allotment for Cheboygan than that proposed by Escanaba. Cheboygan, MI is a much larger community than Onaway, MI (populations are 5,440 and 1,039, respectively; U.S. Census, 1998 estimates) and is more deserving of the C2 signal which would provide better coverage than the C3 frequency proposed by WHAK-FM.

Escanaba again reiterates its interest in the proposed allocation, and states that if the frequency is allotted, Escanaba intends to file an application for Channel 260C2 at Cheboygan, Michigan at such time as filing is permitted by the Commission. Escanaba also hereby reiterates its commitment to reimburse Station WHAK, Rogers City, Michigan, for reasonable costs incurred in changing its frequency.¹

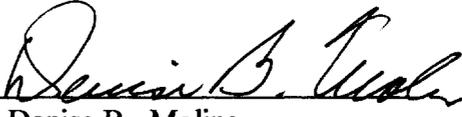
Accordingly, Escanaba respectfully requests that the Commission amend its FM Table of Allotments, Section 73.202(b) of the Commission's Rules, for the communities listed below, as follows:

<i>Community</i>	<i>Channel No.</i>	
	<i>Present</i>	<i>Proposed</i>
Cheboygan, Michigan	286C1	260C2, 286C1
Rogers City, Michigan	244C2, 260C2	244C2, 292C2

¹In the event that the Commission prefers the NRN allotment proposal, Escanaba hereby states that if Channel 249C3 is allotted to Cheboygan, MI, and Channel 260C2 is allotted to Onoway, MI, Escanaba intends to file an application for each of those channels at such time as filing is permitted.

Respectfully submitted,

Escanaba License Corp.

By: 
Denise B. Moline
Its Attorney

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June 30, 2000

CERTIFICATE OF SERVICE

I, Denise B. Moline, of the law firm of Denise B. Moline, Esq., hereby certify that I have caused to be served, this 30th day of June, 2000, a copy of the foregoing "**Comments on Notice of Proposed Rule Making**" by priority mail, postage prepaid, on the following:

*Kathleen Scheuerle
Allocations Branch, Audio Services Division
Federal Communications Commission
445 12th St., S.W., Room 3-A247
Washington, D.C.,20024

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Reddy, Begley & McCormick
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Counsel for Northern Radio Network Corporation


Denise B. Moline, Esq.

*Via Fed Ex