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July 27, 2000

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Magalie R. Salas, Esquire
Secretary
Federal Communications Commission
Room TW-B204
445 12th Street, S.W.
Washington, DC 20554
Attention: Allocations Branch

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JUL 27 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: George West and Pearsall, Texas
MM Docket No. 99-342; RM-9844

Dear Ms. Salas:

Transmitted herewith on behalf of Victoria Radio Works, Ltd., licensee of Station KEPG(FM), Victoria, Texas, are an original and four copies of its "Request to Withdraw Counterproposal," filed in the above-referenced allotment rulemaking proceeding.

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

Very truly yours,
FLETCHER, HEALD & HILDRETH, P.L.C.



Andrew S. Kersting
Counsel for Victoria Radio Works, Ltd.

Enclosure

cc (w/ encl.): Certificate of Service (by hand & first-class mail)
Bob Hayne, Esq. (FCC) (by hand)

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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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JUL 27 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),) MM Docket No. 99-342
Table of Allotments,) RM-9844
FM Broadcast Stations,)
(George West and Pearsall, Texas))

To: Chief, Allocations Branch

REQUEST TO WITHDRAW COUNTERPROPOSAL

Victoria Radio Works, Ltd. ("VRWL"), by counsel, and pursuant to Section 1.420(j) of the Commission's rules, hereby requests the withdrawal of its pending counterproposal in the above-captioned proceeding. In support of this request, the following is stated:

On October 20, 1999, VRWL filed a one-step application to upgrade the licensed facility of Station KEPG(FM), Victoria, Texas, from Channel 265A to Channel 265C3 (File No. BPH-19991020AAX). On April 4, 2000, the FCC issued a Public Notice, Report No. 2401 (released April 4, 2000), stating that VRWL's pending application to upgrade Station KEPG would be treated as a counterproposal in the above-captioned proceeding. However, on July 25, 2000, VRWL filed a request to withdraw its pending application with the FCC's Audio Services Division.¹ Therefore, pursuant to Section 1.420(j) of the Commission's rules, VRWL respectfully requests Commission approval to withdraw its pending counterproposal in this proceeding seeking to upgrade Station KEPG from Channel 265A to Channel 265C3 at Victoria, Texas. Attached hereto as Exhibit 2 are

¹ A copy of VRWL's request to withdraw its pending one-step upgrade application for Station KEPG(FM), Victoria, Texas, is appended hereto as Exhibit 1.

declarations from John W. Barger, President of the General Partner of VRWL, and John R. Furr stating that VRWL has not received, nor has it been promised to receive, any consideration in exchange for the withdrawal of its pending counterproposal.

WHEREFORE, in light of the foregoing, Victoria Radio Works, Ltd. respectfully requests that its pending proposal to upgrade Station KEPG(FM), Victoria, Texas, from Channel 265A to Channel 265C3 be WITHDRAWN.

Respectfully submitted,

VICTORIA RADIO WORKS, LTD.

By:



Harry C. Martin

Andrew S. Kersting

Its Counsel

Fletcher, Heald & Hildreth, P.L.C.
1300 N. Seventeenth Street, 11th Floor
Arlington, Virginia 22209
(703) 812-0400

July 27, 2000

c:\ask...martin\rm\PearsallWithdrawal.wpd

EXHIBIT 1

Copy of Letter Dated July 25, 2000,
Withdrawing the Pending One-Step Upgrade Application
for Station KEPG(FM), Victoria, Texas
(File No. BPH-19991020AAX)

ANN BAVENDER*
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July 25, 2000

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BY HAND DELIVERY

Magalie R. Salas, Esquire

Secretary

Federal Communications Commission

Room TW-B204

445 12th Street, S.W.

Washington, DC 20554

Attention: Audio Services Division

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JUL 25 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Withdrawal of Construction Permit Application
Station KEPG(FM), Victoria, Texas
Facility ID No. 74362
(File No. BPH-19991020AAX)

Dear Ms. Salas:

On behalf of Victoria Radio Works, Ltd., licensee of Station KEPG(FM), Victoria, Texas, this is to request the withdrawal of the above-referenced one-step application seeking to upgrade Station KEPG(FM) from Channel 265A to Channel 265C3.

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

Very truly yours,
FLETCHER, HEALD & HILDRETH, P.L.C.

Asst

Andrew S. Kersting
Counsel for Victoria Radio Works, Ltd.

cc: Mr. James Crutchfield (FCC) (by hand)

EXHIBIT 2

Declarations of John W. Barger and John R. Furr

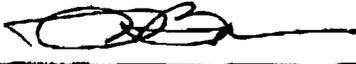
DECLARATION

I, John W. Barger, President of the General Partner of Victoria Radio Works, Ltd. ("VRWL"), hereby state the following:

There are no agreements, written or oral, express or implied, between VRWL or any of its principals, or, to my knowledge, anyone affiliated with VRWL and John R. Furr with respect to VRWL's request to withdraw its counterproposal to upgrade Station KEFG(FM), Victoria, Texas, from Channel 265A to Channel 265C3. Neither VRWL nor any of its principals, nor to my knowledge anyone affiliated with VRWL, has received or has been promised to receive any money or other consideration in exchange for the withdrawal of the VRWL counterproposal in MM Docket No. 99-342.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed and dated this 25th day of July, 2000.



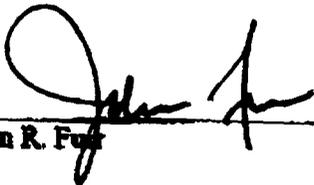
John W. Barger
President of General Partner
Victoria Radio Works, Ltd.

DECLARATION

I, John R. Furr, hereby state that there are no agreements, written or oral, express or implied between myself and any of the principals of Victoria Radio Works, Ltd. ("VRWL") concerning VRWL's pending one-step application to upgrade Station KEFG(FM), Victoria, Texas, from Channel 265A to Channel 265C3. I have not paid nor have I promised to pay any money or other consideration to VRWL in exchange for the withdrawal of its pending application to upgrade Station KEFG at Victoria.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed and dated this 26 day of July, 2000.


John R. Furr

CERTIFICATE OF SERVICE

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 27th day of July, 2000, copies of the foregoing "Request to Withdraw Counterproposal" were hand delivered or mailed first-class, postage pre-paid, to the following:

John A. Karousos, Chief*
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
The Portals II, Room 3-A266
445 Twelfth Street, S.W.
Washington, DC 20554

Ms. Kathleen Scheuerle*
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
The Portals II, Room 3-A247
445 Twelfth Street, S.W.
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Bechtel & Cole, Chartered
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Washington, DC 20036
(Counsel for John R. Furr)

Robert Lewis Thompson, Esquire
Thiemann Aitken et al., LLC
908 King Street, Suite 300
Alexandria, VA 22314
(Counsel for Charlotte Radio Broadcasting Company)



Barbara Lyle

* Hand Delivered