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August 31, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND

Magalie R. Salas, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

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LEE W. SHUBERT
(202) 216-4695

CLIENT No. 43209-84829

Re: Amendment of Section 73.202(b) of the Table of Allotments for **RANGELY, COLORADO**

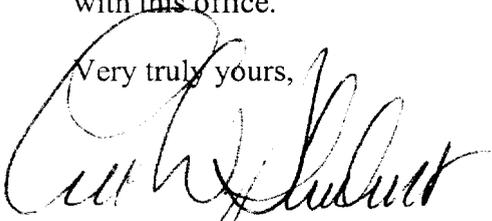
MM Docket No. 99-151; RM 9559

Dear Ms. Salas:

Transmitted herewith, on behalf of **IDAHO BROADCASTING CONSORTIUM, INC. ("IBC")**, and in reference to the above-referenced rulemaking proceeding is an original and four (4) copies of IBC's "**AMENDED DISCLOSURE STATEMENT.**"

Should further information be desired in connection with this matter, kindly communicate directly with this office.

Very truly yours,



Lee W. Shubert

Enclosures (5)

cc(w/1 enc.): Mr. Frederic W. Constant
Mr. Melvyn Lieberman
As per the Certificate of Service

LWS/dml

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AUG 31 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

)
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Amendment of Section 73.202(b),) MM Docket No. 99-151
Table of Allotments,) RM-9559
FM Broadcast Stations)
(Rangely, Colorado))

TO: Chief, Allocations Branch
Mass Media Bureau

AMENDED DISCLOSURE STATEMENT

IDAHO BROADCASTING CONSORTIUM ("IBC"), by its attorneys and consistent with Section 1.1204 the Commission's Rules, hereby respectfully submits this amended summary of a meeting, held August 8, 2000, between and among members of the Mass Media Bureau staff,¹ the principal of IBC, and IBC's engineering and legal counsel respecting processing and procedural issues pertaining to several filings and/or proceedings involving IBC. Among the matters addressed were the proposed FM channel allotments for Rangely, Colorado, as well as Ridgway and Silverton, Colorado, in connection with the above-captioned proceeding.

1. IBC made a presentation indicating that it was frustrated with the Allocations Divisions regarding IBC's counterproposal to substitute an alternate reference point for that proposed by Mountain West Broadcasting, the proponent for the allotment of Channel 297C1 at Rangely, Colorado, then to substitute Channel 273A in lieu of Channel 279C2 at Silverton, Colorado, and allot Channel 279C1 to Ridgway, Colorado, as the community's first aural

¹ In attendance at the meeting were Brian Butler, Jamilla Bess Johnson, John Karousos, Andrew Rhodes, Esq., Roy Stewart, Esq., Michael Wagner, Esq., Bert Withers, Harry Wong

service. IBC believed that the Rangely proceeding was not contested. Prior to and during the meeting IBC advised the staff that it was an uncontested rulemaking proceeding. IBC's belief was derived from the fact that it proposed a reference point, rather than a channel, substitution for the threshold proposal at Rangely, thereby avoiding a mutual exclusivity with IBC's proposal to substitute channels in Silverton, Colorado, and assign a channel to Ridgway, Colorado.

2. The staff indicated that a flaw with IBC's proposal was that it had not indicated that it would either amend its Construction Permit at Silverton to conform to the real-
lotment, or that it would apply for the new allotment in Ridgway. The staff explained that any delay in the processing of the pending counterproposal was result of work load burdens and not any animus of any kind towards IBC.

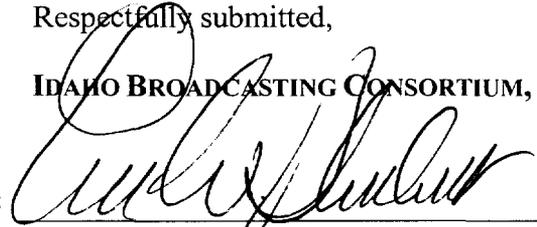
3. Upon the realization that IBC's initial pleading in connection with RM-9559 was in the nature of a counter-proposal, the staff advised that the communication by IBC rose to the level of an *ex parte* contact, and terminated the discussion as it related to the subject rule making proceeding. Moreover, the staff requested that IBC submit the instant disclosure statement to explicate the substance of the discussions.

4. This statement is being filed to ensure a complete record for all parties in connection with the above-captioned proceeding.

Respectfully submitted,

IDAHO BROADCASTING CONSORTIUM, INC.

By:



Lee W. Shubert
Its Attorneys

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Washington, D.C. 20005-2202
Tel: 202-216-4600; Fax: 202-216-4700

Dated: August 31, 2000

CERTIFICATE OF SERVICE

The undersigned, an employee of **ROSENMAN & COLIN, LLP**, hereby certifies that the foregoing **DISCLOSURE STATEMENT**, respecting MM Docket No. 99-151, on behalf of **IDAHO BROADCASTING CONSORTIUM, INC.**, was mailed or hand delivered* this date by First Class U.S. Mail, postage prepaid, to the following:

Mountain West Broadcasting
c/o Victor A. Michael, President
6807 Foxglove Drive
Cheyenne, WY 82009

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

*Andrew Rhodes, Esq.
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By: Cynthia Hough
Cynthia Hough

August 31, 2000