

Before the
Federal Communications Commission
Washington, D.C. 20554

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AUG 17 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Harper, Texas))

MM Docket No. _____
RM - _____

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

COMMENTS

First Broadcasting Company, L.P., Next Media Licensing, Inc., Rawhide Radio, L.L.C., Capstar TX Limited Partnership and Clear Channel Broadcasting Licenses, Inc. ("Joint Parties"), by their respective counsel, hereby submit their Comments to the Petition for Rule Making filed by Charles Crawford on May 7, 2001. The Joint Parties' interest in this proceeding stems from the Counterproposal they filed in MM Docket No. 00-148. The comment date in that proceeding was October 10, 2000. One of the proposals in that Counterproposal was the allotment of Channel 256A at Ingram, Texas.

The Petitioner proposes to allot Channel 256A to Harper, Texas, as the community's first local transmission service. The attached channel study demonstrates that the proposal for Channel 256A at Harper is short spaced to the prior-filed proposal for Channel 256A at Ingram by 88.70 km. On August 3, 2001, the Commission issued a Public Notice, Report No. 2500 announcing acceptance of the Ingram rule making proposal. Accordingly, the Commission should dismiss the Harper Petition for Rule Making as late filed to a pending rule making proceeding. See e.g., Comfort, Texas, DA 01-1864 released August 3, 2001.

Accordingly, the Joint Parties urge the Commission to protect their prior filed and cut-off proposal for Channel 256A at Ingram, Texas and dismiss the proposal for Channel 256A at Harper, Texas, expeditiously.

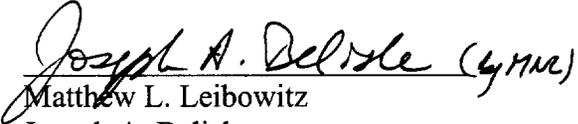
Respectfully submitted

FIRST BROADCASTING COMPANY L.P.
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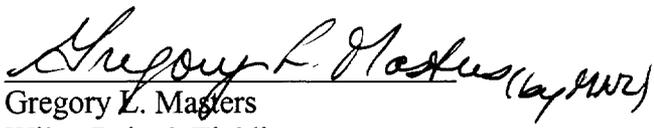
Their Counsel

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Its Counsel

CAPSTAR TX LIMITED PARTNERSHIP
CLEAR CHANNEL BROADCASTING LICENSES, INC.

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Their Counsel

August 17, 2001

Ch 256A Ingram, TX

Of Note: Add 256A Harper, TX is in conflict with original counterproposal

Of Note: KLMO.A Application is in conflict with original counterproposal

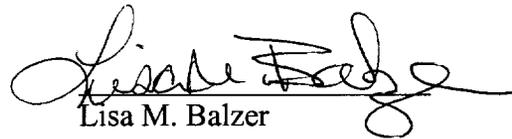
30 04 30 N.			Class A				Search Date
99 14 06 W.			Current rules spacings				08-06-01
----- Channel 256 - 99.1 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
RADD	256A	Ingram	TX	0.0	0.00	115.0	-115.00 *
RADD	256A	Harper	TX	341.5	26.30	115.0	-88.70 *
Of Note: Filing that is in conflict with original counterproposal							
KAYG	256A	Camp Wood	TX	242.1	85.32	115.0	-29.68 *
RDEL	256A	Camp Wood	TX	242.1	85.32	115.0	-29.68 *
KLMOFM 255C1	Dilley		TX	182.0	125.57	133.0	-7.43 *
Of Note: Application (Form 301) that is in conflict With original counterproposal							
KBBT.C	253C1	Schertz	TX	141.0	78.61	75.0	3.61 *
RADD	253C1	Schertz	TX	141.0	78.61	75.0	3.61 *
KBBT	253C1	Schertz	TX	141.0	78.61	75.0	3.61 *
KHHL	255C1	Leander	TX	58.9	139.75	133.0	6.75 *
ALLO	255C1	Leander	TX	58.9	139.75	133.0	6.75 *
RDEL	255C1	Lampasas	TX	58.9	139.75	133.0	6.75 *
ALLO	255C1	Leander	TX	67.2	144.20	133.0	11.20
KHHL.C	255C2	Leander	TX	75.4	139.05	106.0	33.05
KLMOFM	255C1	Dilley	TX	180.5	167.19	133.0	34.19
KISSFM	258C	San Antonio	TX	133.4	129.21	95.0	34.21
RADD	259A	Mason	TX	0.3	74.67	31.0	43.67
RADD	257C1	Brownwood	TX	7.0	182.02	133.0	49.02

CERTIFICATE OF SERVICE

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy and Bacon, do hereby certify that I have on this 17th day of August, 2001 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Comments" to the following:

* Ms. Sharon McDonald
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Petitioner for Harper, Texas


Lisa M. Balzer

* Hand Delivered