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October 1, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Magalie R. Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

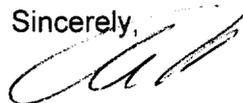
Re: FM Table of Allotments
MM Dkt. No. 01-189, RM-10204
Winnsboro, TX
Counterproposal

Dear Ms. Salas:

Transmitted herewith, on behalf of Annona Broadcasting Company, are an original and four copies of its Counterproposal in the above-referenced rulemaking proceeding proposing to amend the FM Table of Allotments.

If questions arise, please contact the undersigned attorney.

Sincerely,



Ann Bavender
Counsel for
Annona Broadcasting Company

Enclosure

No. of Copies rec'd 0+4
List A B C D E

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

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**FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY**

| | | |
|--------------------------------|---|---------------------|
| In the matter of |) | |
| |) | |
| Amendment of Section 73.202(b) |) | MM Docket No 01-189 |
| |) | |
| Table of Allotments |) | |
| FM Broadcast Stations |) | RM-10204 |
| (Winnsboro and Annona, Texas) |) | |

To: Chief, Allocations Branch

COUNTERPROPOSAL

Annona Broadcasting Company (“ABC”), by its attorney, hereby submits its counterproposal requesting that the Commission amend Section 73.202(b) of its Rules, FM Table of Allotments, to allot FM Channel 263A to Annona, Texas, in lieu of Channel 263A to Winnsboro, Texas as proposed in the Notice Of Proposed Rule Making in the above-captioned proceeding. Accordingly, ABC proposes to amend Section 73.202(b) as follows:

| <u>City</u> | <u>Channel Number Present</u> | <u>Channel Number Proposed</u> |
|---------------|-------------------------------|--------------------------------|
| Annona, Texas | ---- | 263A |

If the requested allotment is made, ABC will apply for a construction permit for a new FM station on Channel 263A at Annona, Texas. If ABC is granted a construction permit, it will promptly construct and operate a new FM station to serve Annona.

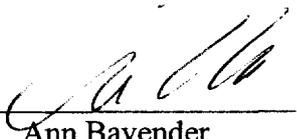
As shown in the attached Engineering Exhibit 1, the allotment of Channel 263A at Annona can be accomplished at the reference co-ordinates: **(33-34-53N 95-03-19W)**

with a site restriction of approximately 13.05 km. No changes are needed to any assignments or allocations.

Annona is a town in Red River County, Texas with a 2000 census population of 282 persons. The allotment of Channel 263A will provide Annona with its first local aural service and an essential outlet for local expression. Accordingly, the allotment will serve the public interest.

Wherefore, for the foregoing reasons, the Commission should amend 73.202(b) of its rules to allot Channel 263A to Annona, Texas.

Respectfully submitted,
Annona Broadcasting Company

By: 

Ann Bavender
Its Attorney

Fletcher, Heald & Hildreth, P.L.C.
1300 N. 17th Street, 11th Floor
Arlington, Virginia 22209
(703) 812-0400

October 1 , 2001

Exhibit 1

Study for: New Annona TX

Search Channel: 263

Class: A

9/24/018:41:51

Latitude: 333453

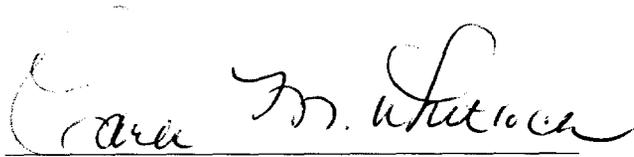
Longitude: 0950319

| <u>Call Letters</u> | <u>Location</u> | <u>Channel</u> | <u>Class</u> | <u>Bearing</u> | <u>Dist (km)</u> | <u>Reqd (km)</u> | <u>OK/Short</u> |
|---------------------|--|----------------|--------------|----------------|------------------|------------------|-----------------|
| NPRM | Winnsboro | 263 | A | 190.52 | 70.63 | 115.00 | Short |
| | <i>MX with instant counterproposal</i> | | | | | | |
| Whitew | Whitewright | 260 | A | 266.53 | 124.65 | 31.00 | OK |
| KMOOFM | Mineola | 260 | A | 206.85 | 103.21 | 31.00 | OK |
| KGRI | Mount Enterprise | 260 | A | 170.13 | 179.07 | 31.00 | OK |
| KPXI | Overton | 264 | C3 | 180.08 | 158.52 | 89.00 | OK |
| KTPW | Sanger | 209 | C1 | 269.23 | 176.84 | 22.00 | OK |
| KDVE | Tatum | 262 | A | 161.30 | 141.02 | 72.00 | OK |
| Van Al | Van Alstyne | 260 | A | 263.72 | 130.91 | 31.00 | OK |
| KPYN | Atlanta | 261 | C2 | 111.91 | 97.00 | 55.00 | OK |
| KDETFM | Center | 263 | A | 160.01 | 218.93 | 115.00 | OK |
| KRBV | Dallas | 262 | C | 238.18 | 209.61 | 165.00 | OK |
| WRR | Dallas | 266 | C | 238.39 | 209.86 | 95.00 | OK |
| KWRDFM | Highland Village | 264 | C | 269.24 | 176.82 | 165.00 | OK |
| KWRDFM | Highland Village | 264 | C | 269.24 | 176.82 | 165.00 | OK |
| KTGS | Ada | 210 | A | 311.21 | 201.01 | 10.00 | OK |
| KYKC | Byng | 261 | C2 | 311.85 | 211.43 | 55.00 | OK |
| KYKC | Byng | 261 | C3 | 309.72 | 198.71 | 42.00 | OK |
| KDAQ | Shreveport | 210 | C1 | 133.56 | 145.38 | 22.00 | OK |
| KRMDFM | Shreveport | 266 | C | 133.50 | 144.33 | 95.00 | OK |
| Whitew | Whitewright | 260 | A | 266.53 | 124.65 | 31.00 | OK |
| Whitew | Whitewright | 260 | A | 266.53 | 124.65 | 31.00 | OK |
| KDELFM | Arkadelphia | 265 | A | 72.44 | 194.64 | 31.00 | OK |
| NEW | Booneville | 209 | C1 | 32.03 | 199.94 | 22.00 | OK |
| NEW | Fort Smith | 209 | C2 | 23.40 | 200.28 | 15.00 | OK |
| KTCSFM | Fort Smith | 260 | C | 11.78 | 168.93 | 95.00 | OK |
| KBBQFM | Fort Smith | 264 | C2 | 19.79 | 193.83 | 106.00 | OK |
| KZHE | Stamps | 263 | C2 | 94.03 | 165.97 | 166.00 | Short |
| NEW | Van Buren | 210 | A | 17.02 | 216.49 | 10.00 | OK |

CERTIFICATE OF SERVICE

I, Carla Whitlock, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that a true copy of the foregoing Counterproposal was served this 1st day of October, 2001, via First Class Mail, postage prepaid, on the following:

Ms. Katherine Pyeatt
6655 Airtree Circle
Dallas, Texas 75214

A handwritten signature in cursive script that reads "Carla M. Whitlock". The signature is written in black ink and is positioned above a horizontal line.

Carla M. Whitlock