

To: Office of Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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In the Matter of:
Amendment of Section 73.622(b)
Table of Allotments
Digital Television Broadcast Stations
(Lufkin, Texas)

MM Docket No. 01245
RM 10235

Comments Against Amendment – reference RM 10235

November 8, 2001

As owner of Media Services Group, an advertising agency, I see KIBN as an important element in our community. My company is very active throughout the state and knows of the invaluable, essential and irreplaceable service that KIBN provides to the community. The station offers much more to the local community than the full-power "satellite" stations licensed to our town. Although KIBN does not sell advertising time, my clients are distressed at the potential loss of the station to our community. For many years, the station has offered programming unavailable from any other source and the entire advertising community is very unhappy with the filing of KTRE for Channel 11, many to the point of canceling their air schedules on KTRE. Below is a just a sampling of the community coverage offered by KIBN.

KIBN is the only television broadcaster of area high school and college sports and academic events. Since 1992, the KIBN crew has broadcasted local football, basketball, baseball, soccer, marching band and swimming contests giving the area students a showcase for their talents and skills. For years, KIBN has followed area teams in playoff series, broadcasting from major facilities such as Texas Stadium, Baylor Stadium, A&M Kyle Field and the Astrodome, as examples, giving the citizens of East Texas that were unable to travel an opportunity to see these major community events. KIBN was also the only station to ever broadcast an area team's state playoff game live via satellite.

Because of the many hours of local broadcasts, the station offers the opportunity for many students to begin a broadcast career or to gain the experience needed to complete their college requirements. Many former KIBN students work in major market television stations and network operations. Without this experience, most would still be working toward making the major markets.

The station has been very involved in the community by broadcasting and hosting area events. City council meetings, Texas Forest Festival, Red Ribbon week activities, Angelina County Rodeo, Angelina Beautiful Clean, Chamber of Commerce, Martin Luther King Day Remembrances and the broadcasts of every parade are just some of the organizations and events the station is involved with on an continual basis.

This involvement in the community carries forward to the safety of the community. The station has been very involved in providing weather alerts and warning information to the public. Many times, the station has been the only one to get the word out about a serious weather situation while other stations were still looking for the information or were without power. KIBN also began the process of bring the first weather Doppler radar system to Deep East Texas. The station has also been involved in county and city emergency preparedness operations and has assisted in community drills and evaluations.

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As a local broadcaster, KIBN is available to broadcast the weekly services of many churches of various denominations. This invaluable service to the community is not available through any other broadcaster. This opportunity has fostered an ecumenical community that works together for the common good of the community, reaching across denominational and racial lines.

Beyond the community, the KIBN cameras and personnel have been to other countries including China, Russia, India, Canada and Central America to bring back the stories of East Texans sharing their lives with these countries. In one of three trips to Russia, KIBN's camera was witness to the first meeting of religious broadcasters where broadcasting ideas and encouragement was offered to the struggling Russian broadcasters.

The facts are obvious that with the loss of KIBN to the community, many services and programs the public has depended on would cease to exist. Please deny the request of Civic Communications to take Channel 11.

Respectfully submitted,



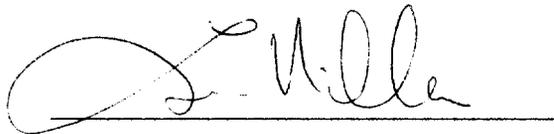
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cc: Scott S. Patrick, counsel for Civic License Holding Company, Inc.
Paul Broyles, International Broadcasting Network

CERTIFICATE OF SERVICE

I, Lee Miller, hereby certify that on this 8 day of November 2001, a copy of the foregoing comments have been served by first-class mail, postage prepaid, upon the following:

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A handwritten signature in cursive script, appearing to read "L. Miller", is written over a horizontal line.