

February 1, 2002

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Ms. Magalie R. Salas, Secretary
Federal Communications Commission
Portals II, TW-A325, 445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Petition for Rule Making/ Quahah, TX
Reply to Request for Supplemental Information

Dear Ms. Salas:

00-1481

Enclosed is an original and four (4) copies of my "Reply to Request for Supplemental Information" for Quannah, Texas.

Respectfully Submitted,



Maurice Salsa
5615 Evergreen Valley Drive
Kingwood, TX 77345
(281) 360-6932 Tele

AAgain

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

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FEB 01 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of 73.202 (b))	MM Docket No. 00-148
Table of Allotments)	RM-9939
FM Broadcast Stations)	RM-10198
(Quanah, TX))	

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

REPLY TO REQUEST FOR SUPPLEMENTAL INFORMATION

I, Maurice Salsa, hereby reply to the "Request for Supplemental Information" requested and adopted by the Commission on January 16, 2002 and released on January 18, 2002 in the above captioned proceeding.

DISCUSSION

In the FCC's Request for Supplemental Information, adopted 1/16/02, the Commission requested that the Joint Parties to the above captioned proceeding produce the underlying agreement between themselves and AM & PM Broadcasting, LLC concerning AM & PM's downgrade of the KICM/Krum, Texas CP from a Class C1 to a Class C2. The Commission made the clarification that the downgrading of a CP was a withdrawal of an expression of interest and therefore, falls under the ambit of the 1.420(j) rules.

As a result of this distinction by the FCC in their 1/16/02 Request for Supplemental Information, I am requesting that the Joint Parties also produce the underlying agreement which they have with AM & PM Broadcasting, LLC in this proceeding to downgrade the KGOK/ Healdton, Oklahoma CP from a Class C3 to a Class A and change its community of license from Healdton, Oklahoma to Purcell, Oklahoma.

At the time of the filing of the Joint Parties Counterproposal, KGOK was a licensed facility to Pauls Valley with a CP to Healdton. Therefore, at the time of the filing of the Counterproposal AM & PM Broadcasting, LLC was withdrawing its expression of interest in its C3 CP to Healdton, Oklahoma.

At the very least, it is appropriate and in the public interest that the Joint Parties produce the required 1.420(j) documents necessary for AM & PM Broadcasting, LLC to withdraw its expression of interest in KGOK/ Healdton, Oklahoma's C3 CP.

This request is appropriate and in the public interest as a result of the Commissions 1/16/02 clarification regarding the downgrading of a CP being a withdrawal of an expression of interest and also the Joint Parties own certification in their Counterproposal in which they stated that "Pursuant to Section 1.420(j), the Joint Parties hereby state that they have not paid nor promised to pay, in any of their agreements, any licensee or permittee for withdrawing an expression of interest, dismissing an application or forbearing to file an expression of interest".

Let me be clear, I am asking the Commission to expand the scope of their 1/16/02 "Request for Supplemental Information" to include KGOK/ Healdton because the circumstances are strikingly similar to KICM/ Krum and would eventually have the same impact on the Counterproposal because of its withdrawal of an expression of interest with the downgrade of a CP.

Therefore, for the above stated reasons I am requesting that the Joint Parties produce any and all underlying agreements which they have with AM & PM Broadcasting, LLC to downgrade the KGOK/ Healdton, Oklahoma CP from a Class C3 to a Class A and change its community of license from Healdton, Oklahoma to Purcell, Oklahoma. Furthermore, I am requesting that the Joint Parties produce the required 1.420(j) documents necessary for AM & PM Broadcasting, LLC to withdraw its expression of interest in the KGOK/ Healdton, Oklahoma C3 CP.

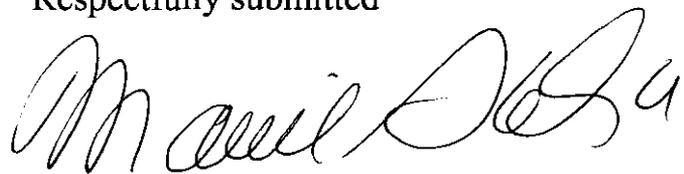
On another related matter with the Joint Parties, after becoming aware of the recent 1/16/02 filings of the Joint Parties, "Corrected Service List" and "Certifications of No Consideration" I hereby would like to inform the Joint Parties that again I was not properly served with these filings. (see attachment A, Certificate of Service for "Corrected Service List" and attachment B, Certificate of Service for "Certifications of No Consideration").

On January 9, 2002, I filed a pleading in this proceeding pointing out to the Joint Parties that I was not properly served with their "Reply to Partial Opposition to Motion to Strike" which they filed on December 26, 2001. In that pleading, I had assumed that their failure to serve me was a clerical error.

Again, the Joint Parties have failed to serve me with their last two pleadings, "Reply to Corrected Service List" and "Certifications of No Consideration". Additionally, they still have not served me with their "Reply to Partial Opposition to Motion to Strike".

The information provided in this "Reply to Request for Supplemental Information" is correct and true to the best of my knowledge.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Maurice Salsa", written in a cursive style. The signature is positioned above a horizontal line.

Maurice Salsa
5615 Evergreen Valley Drive
Kingwood, TX 77345
(281) 360-6932 Tele

February 1, 2002

Attachment A

CERTIFICATE OF SERVICE

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy & Bacon, do hereby certify that I have on this 16th day of January, 2002 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Corrected Service List" to the following:

NationWide Radio Stations
Marie Drischel, General Partner
496 Country Road
Suite 308
Big Creek, MS 38914
(Petitioner)

Station KXOO
Paragon Communications, Inc.
P.O. Box 945
Elk City, OK 73648

Stations KGOK(FM) and KICM
AM & PM Broadcasting LLC
5946 Club Oaks Drive
Dallas, TX 75248

Station KRZB
Texas Grace Communications
P.O. Box 398
Wichita Falls, TX 76307

Robert L. Thompson, Esq.
Thiemann Aitken & Vohra, L. L.C.
908 King Street
Suite 300
Alexandria, VA 22314
(Counsel to AM & PM Broadcasting,
LLC)

Station KKAJ
Chuckie Broadcasting, Co.
Box 429
1205 Northglen
Ardmore, OK 73402

Station KSEY
Mark V. Aulabaugh
Box 471
Seymour, TX 76380

Timothy Brady, Esq.
P.O. Box 71309
Newnan, GA 30271-1309
(Counsel to Chuckie Broadcasting Co)

Station KLRK
KRZI, Inc.
1018 N. Valley Mill Drive
Waco, TX 76710

Lee Peltzman, Esq.
Shainis & Peltzman, Chartered
1850 M Street, NW
Suite 240
Washington, DC 20036
(Counsel to KRZI, Inc.)

Sheldon Broadcasting, Ltd.
P.O. Box 1996
Temple, TX 76502
(Licensee of KLFX)

Dan J. Alpert, Esq.
2120 North 21st Road
Suite 400
Arlington, VA 22201
(Counsel to Fritz Broadcasting Co.)

Gene A. Bechtel, Esq.
9312 Wooden Bridge Road
Potomac, MD 20854
(Counsel to Elgin FM Limited
Partnership and Charles Crawford)


Lisa M. Balzer

Attachment B

CERTIFICATE OF SERVICE

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy & Bacon, do hereby certify that I have on this 16th day of January, 2002 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Corrected Service List" to the following:

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Wichita Falls, TX 76307

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Timothy Brady, Esq.
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Newnan, GA 30271-1309
(Counsel to Chuckie Broadcasting Co)

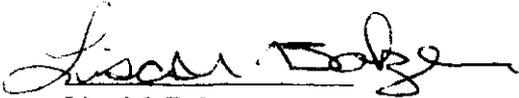
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(Counsel to Fritz Broadcasting Co.)

Gene A. Bechtel, Esq.
9312 Wooden Bridge Road
Potomac, MD 20854
(Counsel to Elgin FM Limited
Partnership and Charles Crawford)


Lisa M. Balzer

CERTIFICATE OF SERVICE

I, Maurice Salsa, hereby certify that on this 1st day of February, 2002, I caused copies of the foregoing "Reply to Request for Supplemental Information" to be placed in the U.S. Postal Service, first class postage prepaid, addressed to the following persons:

John Karousos, Chief
Allocations Branch
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Marie Drischel, General Partner
NationWide Radio Stations
496 Country Road 308
Big Creek, Mississippi 38914
Counsel for Nationwide Radio Stations

Matthew L. Leibowitz
Joseph A. Belisle
Leibowitz & Associates, P.A.
One Southeast Third Avenue
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Miami, FL 33131-1715
Counsel for Next Media Licensing, Inc.

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Mark V. Aulabaugh
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Seymour, TX 76380

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& Clear Channel Broadcast
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Counsel for First Broadcasting
Company L.P. & Rawhide
Radio L.L. C.

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Paragon Communications, Inc.
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Elk City, OK 73648

Station KKAJ
Chuckie Broadcasting, Co.
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1205 Northglen
Ardmore, OK 73402

David P. Garland, President
Stargazer Broadcasting, Inc.
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Woodville, Texas 75979

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BK Radio
1809 Lightsey Road
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Station KLRK
KRZI, Inc.
1018 N. Valley Mill Drive
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(Licensee of KLFX)

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Co., Inc.



Maurice Salsa