

May 6, 2002

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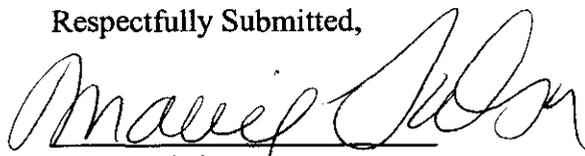
Mr. William F. Caton, Secretary
Federal Communications Commission
Portals II, TW-A325, 445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Petition for Rule Making/ Quanah, TX (00-148) ✓
Reply to Response to Request for Supplemental Information

Dear Mr. Caton:

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

Respectfully Submitted,



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

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

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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: John Karousos, Assistant Chief,
Audio Division of the Media Bureau

REPLY TO RESPONSE TO REQUEST FOR SUPPLEMENTAL INFORMATION

I, Maurice Salsa, hereby reply to the "Response to Request for Supplemental Information," filed by Next Media Licensing, Inc. ("NMLI"), First Broadcasting Company, L.P. ("FBC"), Capstar TX Limited Partnership ("Capstar"), Clear Channel Broadcasting Licenses, Inc. ("Clear Channel"), and Rawhide Radio, L.L.C. ("Rawhide") ("Joint Parties"), in the above captioned proceeding filed on April 26, 2002.

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 assertion that the downgrading of the KICM/ Krum, Texas CP was, under the rules of the FCC, a withdrawal of an expression of interest and therefore, falls under the ambit of the 1.420(j) rules as it relates to the Counterproposal filed by the Joint Parties.

In their April 26, 2002 Reply to Request for Supplemental Information, the Joint Parties chose not to produce the "agreement" or any other documentation required by 1.420(j). Similarly, AM & PM Broadcasters, the other party directly associated with the "agreement" requested by the Commission, filed a separate Statement in Reply to the Commission's Request for Supplemental Information also on April 26, 2002. In that Statement, AM & PM continually refers to the "agreement", but as in the case of the Joint Parties, they have deliberately chosen not to produce the "agreement" requested by the FCC. However, AM & PM does in fact reveal in its statement the existence of an "agreement" and that the "agreement" expires on June 30, 2002. Inexplicably, AM & PM chose not to indicate the amount of compensation or the date the original "agreement" was signed.

Despite the compelling request by the Commission on 1/16/02 for the Joint Parties to produce this "agreement", the Joint Parties have chosen not to do so.

Given the above circumstances, I am again requesting, as I did in my February 1, 2002 filing in this proceeding, that the Commission also request that the Joint Parties produce the underlying agreement 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 it community of license from Healdton, Oklahoma to Purcell, Oklahoma.

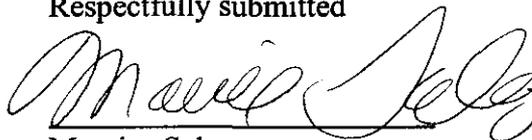
At the time of the filing of the Joint Parties Counterproposal, KGOK was a licensed facility to Pauls Valley with a CP to Healdton. Therefore, at the time of the filing of the Counterproposal AM & PM Broadcasting, LLC was withdrawing its expression of interest in its C3 CP to Healdton, Oklahoma.

Clearly the Joint Parties Counterproposal at Quanah was defective from the day it was filed on 10/10/2000 and to this date remains defective. The Counterproposal was filed after the C1 at Krum, Texas was accepted for filing on 8/20/2000. The Joint Parties then tried to correct their defective Counterproposal by then entering into an "agreement" with AM & PM Broadcasters to downgrade the KICM CP for compensation. However, as noted earlier, the FCC has found this "agreement" to be unacceptable.

The Joint Parties Counterproposal is not now , nor was it ever, acceptable for submission and consideration by the Commission. Therefore, I seek consideration from the FCC to dismiss with all speed the defective Counterproposal at Quanah, Texas filed by the Joint Parties.

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

Respectfully submitted



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

May 6, 2002

CERTIFICATE OF SERVICE

I, Maurice Salsa, hereby certify that on this 6th day of May, 2002, I caused copies of the foregoing "Reply to Response 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, Assistant Chief,
Audio Division of the Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

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

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

Dan J. Alpert, Esquire
Law Office of Dan J. Alpert
2120 North 21st Street, Suite 400
Arlington, Virginia 22201
(Counsel to Fritz Broadcasting Co., Inc.)

Mark N. Lipp
J. Thomas Nolan
Shook Hardy & Bacon LLP
600 14th Street, NW, Suite 800
Washington, DC 20005
(Counsel for First Broadcasting Company
L.P. & Rawhide Radio L.L.C.)

Gregory L. Masters
Wiley Rein & Fielding
1776 K Street, NW
Washington, DC 20006
(Counsel for Capstar Tx L.P. &
Clear Channel Broadcast Licenses, Inc.)

Matthew L. Leibowitz
Joseph A. Belisle
Leibowitz & Associates, P.A.
One Southeast Third Avenue, Suite 1450
Miami, FL 33131-1715
(Counsel for Next Media Licensing, Inc.)

Jeffrey D. Southmayd, Esq.
Southmayd & Miller
1220 19th Street, NW, Suite 400
Washington, DC 20036
(Counsel to The Sister Sherry Lynn
Foundation, Inc.)



Maurice Salsa