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July 15, 2002

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**BY HAND DELIVERY**

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-B204  
Washington, DC 20554

JUL 15 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: Comments of Deas Communications, Inc.  
MM Docket No. 02-105, RM-10396  
Boonville, California**

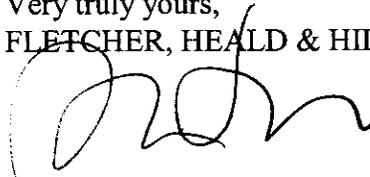
Dear Ms. Dortch:

Enclosed herewith, on behalf of Deas Communications, Inc., are an original and four copies of its Comments in the above-referenced rulemaking proceeding.

An extra copy of this filing, marked 'Please Stamp and Return This Copy to Fletcher, Heald & Hildreth,' is enclosed. Please date-stamp this copy and return it with the messenger.

Should there be any questions regarding this matter, kindly communicate directly with the undersigned.

Very truly yours,  
FLETCHER, HEALD & HILDRETH, P.L.C.



Alison J. Shapiro  
Counsel for Deas Communications, Inc.

Enclosure

cc: Mr. John A. Karousos (w/encl.)  
Mr. R. Barthen Gorman (w/encl.)

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

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JUL 15 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
Amendment of Section 73.202(b)	)	
Table of Allotments,	)	MM Docket No. 02-105
FM Broadcast Stations.	)	RM-10396
(Boonville, California)	)	

To: Chief, Allocations Branch

**COMMENTS OF DEAS COMMUNICATIONS, INC.**

Deas Communications, Inc. ("Deas"), by counsel, and pursuant to Section 1.415 of the Commission's rules, hereby respectfully submits these comments in response to the Commission's Notice of Proposed Rulemaking (the "Notice")<sup>1</sup>, released May 24, 2002, in the above-captioned proceeding. The Notice proposes to amend the FM Table of Allotments by substituting channel 300A<sup>2</sup> for vacant channel 241A at Boonville, California. This substitution would alleviate the first adjacent short-spacing problem faced by Station KRSH(FM)<sup>3</sup>, which operates on channel 240A at Healdsburg, California. Thus, the Notice proposes to amend Section 73.202(b) of the Commission's rules as follows:

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<sup>1</sup> In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Boonville, California), MM Docket No. 02-105, RM-10396 (released May 24, 2002).

<sup>2</sup> Deas originally proposed the substitution of Channel 286A for vacant Channel 241A at Boonville, but the Commission's analysis revealed that this channel would be mutually exclusive with a recently-filed application by station KRPQ(FM), Rohnert, California. The Commission therefore proposed an alternative – Channel 300A. Deas wishes to proceed with this rulemaking proceeding to substitute Channel 300A for vacant Channel 241A at Boonville, California.

<sup>3</sup> At the time Deas' Petition for Rulemaking was filed the station's call sign was KSXY(FM). On March 1, 2002, its call sign was changed to KRSH(FM).

**Channel No.**

<b><u>City</u></b>	<b><u>Present</u></b>	<b><u>Proposed</u></b>
Boonville, California	241A	300A

As stated in the Notice, Channel 300A can be allotted to Boonville, California, consistent with the requirements of Sections 73.207(b)(1) and 73.315(a) of the Commission's rules, with a site restriction of 11.2 kilometers west of Boonville. The substitution of Channel 300A for vacant Channel 241A will allow KRSH(FM) to be fully spaced, thereby alleviating the need to maintain an expensive and restrictive directional antenna. As stated in Deas' Petition for Rulemaking, if KRSH(FM) could employ an omni-directional antenna, it would provide a 60 dBu service to 354,867 persons in 3,862.9 square kilometers. This increase in coverage area would permit service to an additional 53,277 persons.<sup>4</sup>

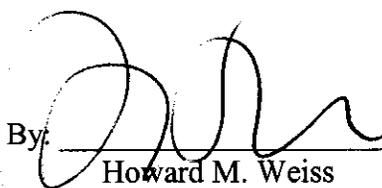
In the event that this petition requesting the substitution of channel 300A for vacant channel 241A at Boonville, California is granted, Petitioner will promptly file an application to modify its facilities substituting an omni-directional antenna and, if granted, will implement the change.

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<sup>4</sup> Further, since the Boonville channel is vacant and no applications for it have been accepted, no party will be affected by the substitution.

WHEREFORE, in light of the foregoing, Deas Communications, Inc., respectfully requests that the Commission AMEND the FM Table of Allotment, and SUBSTITUTE channel 300A for vacant channel 241A at Boonville, California.

Respectfully submitted,  
DEAS COMMUNICATIONS, INC.

By:   
Howard M. Weiss  
Alison J. Shapiro  
Its Counsel

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July 15, 2002

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