

DOCKET FILE COPY ORIGINAL

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

In the Matter of )  
)  
Amendment of Section 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations. )  
(Amboy, California) )

MB Docket No. 02-124  
RM-10446

**RECEIVED**

TO: John A. Karousos  
Assistant Chief, Audio Division  
Office of Broadcast License Policy  
Media Bureau

JUL 30 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**WITHDRAWAL OF MOTION TO DISMISS COUNTERPROPOSAL  
OF CAMERON BROADCASTING, INC.**

JOSEPH D. SULLIVAN

Latham & Watkins  
555 Eleventh Street, N.W.  
Suite 1000  
Washington, D.C. 20004  
(202) 637-2200

*Counsel for KJUL License, LLC*

July 30, 2002

No. of Copies rec'd  
List ABCDE

*014*

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

RECEIVED

JUL 30 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Section 73.202(b), ) MB Docket No. 02-124  
Table of Allotments, ) RM-10446  
FM Broadcast Stations. )  
(Amboy, California) )

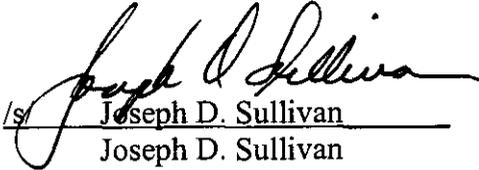
TO: John A. Karousos  
Assistant Chief, Audio Division  
Office of Broadcast License Policy  
Media Bureau

**WITHDRAWAL OF MOTION TO DISMISS COUNTERPROPOSAL  
OF CAMERON BROADCASTING, INC.**

KJUL License, LLC ("License"), license of KSTJ(FM), Boulder City, Nevada, hereby withdraws its motion to dismiss the Counterproposal filed by Cameron Broadcasting, Inc. in the above-captioned matter filed on July 24th. License has reached an agreement with Cameron Broadcasting, Inc. on terms of an option to acquire KFLG-FM, Kingman, Arizona. The option agreement provides among other matters that License consents to allow KSTJ 274C to be downgraded to a Class C0 FM station at its existing transmitter site provided that the parties conclude an agreement on the terms of an asset purchase agreement for the acquisition of KFLG-FM within 30 days of the date hereof, and provided the Counterproposal is granted so as to permit the grant of a construction permit for full Class C facilities for KFLG in accordance with the terms of the Counterproposal. The parties currently have every expectation that they will be able to reach agreement on the terms of an asset purchase agreement, and will notify the

Commission promptly upon the expiration of the 30-day period as to the status of the agreement. Accordingly, License hereby withdraws its Motion To Dismiss and affirms its consent to the downgrade of KSTJ(FM) on the terms set forth above.

Respectfully submitted,

  
/s/ Joseph D. Sullivan  
Joseph D. Sullivan

Latham & Watkins  
555 Eleventh Street, N.W.  
Suite 1000  
(202) 637-2221

*Counsel for KJUL License, LLC*

July 30, 2002

CERTIFICATE OF SERVICE

I, Victoria A. Ladd, hereby certify that on this 30<sup>th</sup> day of July, 2002, I caused copies of the foregoing "Withdrawal of Motion To Dismiss Counterproposal Of Cameron Broadcasting, Inc." to be placed in the U. S. Postal Service, first class postage prepaid, or hand delivered (as indicated below), addressed to the following persons:

Deborah A. Dupont  
Audio Division  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.-Room 3-A224  
Washington, D.C. 20554  
(By Hand)

Marissa G. Repp, Esquire  
F. William LeBeau, Esquire  
Hogan & Hartson, L.L.P.  
555 Thirteenth Street, N.W.  
Washington, D.C. 20004-1109  
Counsel for KHWY, Inc.

Anne Thomas Paxson, Esquire  
Borsari & Paxson  
2021 L Street, N.W.  
Suite 402  
Washington, D.C. 20036  
Counsel for Farmworker Educational Radio Network, Inc.

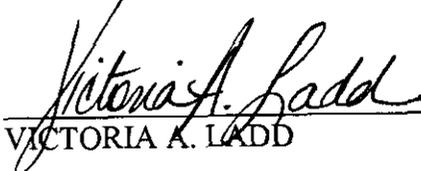
Dean R. Brenner, Esquire  
Crispin & Brenner, P.L.L.C.  
1156 15<sup>th</sup> Street, N.W.  
Suite 1105  
Washington, D.C. 20005  
Counsel for Pahrump Radio, Inc.  
(licensee of Station KNYE(FM))

Route 66 Broadcasting, LLC  
422 West Highway 66  
Seligman, Arizona 86337  
(licensee of Station KZKE(FM))  
Stephen A. Hildebrandt, Esquire

CBS Radio  
10220 River Road  
Suite 305  
Potomac, Maryland 20854  
(licensee of Station KMXB(FM))

JoEllen Master, Esquire  
Shaw Pittman  
2001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006-1824  
Counsel of Baker Broadcasting, L.L.C.  
(licensee of Station KKBK-FM)

Harry F. Cole  
Alison J. Shapiro  
Fletcher, Heald & Hildreth, P.L.C.  
1300 N. 17<sup>th</sup> Street – 11<sup>th</sup> Floor  
Arlington, Virginia 22209  
(703) 812-0483  
*Counsel for Cameron Broadcasting, Inc.*

  
VICTORIA A. LADD