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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.)
(Benjamin, Texas))

MM Docket No. 01-131

and

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

MM Docket No. 01-133

To: Assistant Chief, Audio Division
Office of Broadcast License Policy
Media Bureau

REPLY TO OPPOSITION TO
PETITION FOR RECONSIDERATION

1. The reply to Charles Crawford's petition for reconsideration, submitted in the name of Rawhide Radio with the statement that other members of the Joint Parties also do not concede Mr. Crawford's position, is without merit.

2. We don't believe for a minute that the labywrinthine trail set forth in the petition, which is not denied, is the way the Commission has been doing business in the FM allotment rulemaking proceedings for the past 40 years. We believe the FM

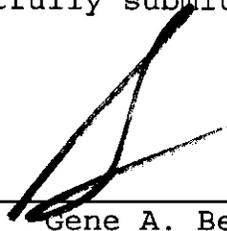
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allotment rulemaking proceedings have comported with principles enunciated in the court and agency case law cited in our petition. But if our belief is wrong and if the argument of Rawhide is correct, then the agency's FM rulemaking procedures stand as a wildly rampant and unlawful violation of the Administrative Procedure Act.

3. The demeaning references to Mr. Crawford's efforts to reserve at least some FM spectrum against the onslaught of big city broadcasters are also without merit. Someone has to make an effort to preserve the spectrum for use as genuine local outlets for small communities of our nation. The government should be a champion of such populist actions by its citizens. This agency well knows the sad story. All it has to do is listen to WPGC, one of the major audience/ratings outlets in the Baltimore-Washington radio market, the nation's 20th and 9th ranked markets respectively, owned and operated by a major group broadcaster, Infinity, whose frequency was allotted to the community of Morningside, Maryland, population 1,295. Rawhide and its cohorts want to create new "Morningsides" in the Dallas-Fort Worth, San Antonio and Austin markets, relying on population statistics that are always larger for bigger towns than for smaller towns. If the system really works that way, then local FM outlets for vast numbers of small towns throughout the nation are a dead letter, writing a vital element of Section 307(b) out

of the Communications Act.

Respectfully submitted,



Gene A. Bechtel

Law Office of Gene Bechtel, P.C.
Suite 600, 1050 17th Street, N.W.
Washington, D.C. 20036
Telephone 202-496-1289
Telecopier 301-762-0156

Counsel for Charles Crawford

August 28, 2002

CERTIFICATE OF SERVICE

I certify that copies of the foregoing REPLY TO OPPOSITION TO PETITION FOR RECONSIDERATION filed this date on behalf of Charles Crawford are - also on this date - being delivered to the office of the Secretary for delivery to Messrs. Stewart and Ratcliffe and being placed in the United States mails, postage prepaid, first class, addressed to the offices of the other parties as shown on the attached "Quanah, Texas, Service List."



Gene A. Bechtel

August 28, 2002

Quanah, Texas, Service List

Roy J. Stewart, Chief
Office of Broadcast
License Policy
Media Bureau
Federal Communications
Commission
445 12th Street, S.W.
Washington, D.C. 20554
(By Hand)

Robert Ratcliffe, Deputy
Chief, Media Bureau
Federal Communications
Commission
445 12th Street, S.W.
Washington, D.C. 20554
(By Hand)

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

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

Vincent A. Pepper, Esq.
Pepper & Corazzini, L.L.P.
1776 K Street, N.W.
Suite 200
Washington, D.C. 20006
Counsel for Windthorst Radio
Broadcasting Company

Dan J. Alpert, Esq.
Law Office of Dan J. Alpert
2120 North 21st Street
Suite 400
Arlington, Virginia 22201
Counsel for Fritz
Broadcasting Co., Inc.

Maurice Salsa
5615 Evergreen Valley Drive
Kingwood, Texas 77345

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

Timothy Brady, Esq.
P.O. Box 71309
Newman, Georgia 30271
Counsel for Chuckie
Broadcasting Co.

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

Robert L. Thompson, Esq.
Thiemann, Aitken &
Vohra, L.L.C.
908 King Street
Suite 300
Alexandria, Virginia 22314
Counsel for AM & PM
Broadcasting, LLC

Lee Peltzman, Esq.
Shainis & Peltzman, Chartered
1850 M Street, N.W.
Suite 240
Washington, D.C. 20036
Counsel for KRZI, Inc.

Sheldon Broadcasting, Ltd.
P.O. Box 1996
Temple, Texas 76502

Matthew L. Leibowitz, Esq.
Leibowitz & Associates, P.A.
One SE Third Avenue
Suite 1450
Miami, Florida 33131
Counsel for Next Media
Licensing, Inc.

Gregory L. Masters, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006
Counsel for Capstar TX LP and
Clear Channel Broadcast
Licenses, Inc.

David P. Garland, President
Stargazer Broadcasting, Inc.
P.O. Box 519
Woodville, Texas 75979

Bryan A. King
BK Radio
1809 Lightsey Road
Austin, Texas 78704

Mark N. Lipp, Esq.
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005
Counsel for First Broadcasting
Company, L.P. and Rawhide
Radio, L.L.C.
