

Big Bend Broadcasting

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RECEIVED & INSPECTED

OCT 17 2002

FCC - MAILROOM

October 15, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: MB Docket No. 02-243
RM-10533

Dear Ms. Dortch

Transmitted herewith on behalf of Big Bend Broadcasting, are *an* original and four (4) copies of its Counterproposal and Comments in the above referenced proceeding.

In the event that the Commission has questions with respect to any of these matters, please contact the undersigned.

Respectfully,



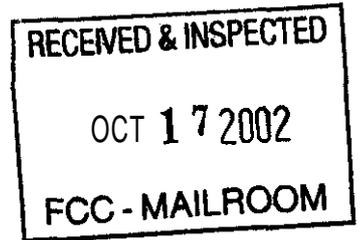
James S. Bumpous
General Partner
Big Bend Broadcasting
13915 Lakeview Dr.
Austin, TX. 78732

Enclosures

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Before the
Federal Communications Commission
Washington, DC 20554



In the matter of)
)
Amendment of Section 73.202(b))
Table of Allotments) MB Docket No.02-243
FM Broadcast Station) RM-10533
(Mertzon, Texas))

To: Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW, TW-A325
Washington, DC 20554

COUNTERPROPOSAL AND COMMENTS

Big Bend Broadcasting (“BBB”) pursuant to the Notice of proposed Rule Making in the above captioned matter, hereby respectfully submits its Counterproposal, and urges that the public interest, convenience and necessity as well as a fair, efficient and equitable distribution of broadcast facilities would be better served by amendment of the Commission’s FM Table of Allotments to allocate Channel 278C to Marathon. Texas as its first full-time aural service.

Marathon, Texas is a census-designated place with Census 2000 population of 455 people. Marathon has its own Elementary and High Schools, Public Library, and Baptist and Catholic Churches. Marathon has a bank, five restaurants, a Law office, a Real estate office, a Health Center, a Hotel, a Motel, and a Guest Ranch. Many of these businesses use the name of Marathon in their business name. Allotment of Channel 278C to Marathon would satisfy Priority (1) of the Commission’s allotment priorities (first full-time aural service).

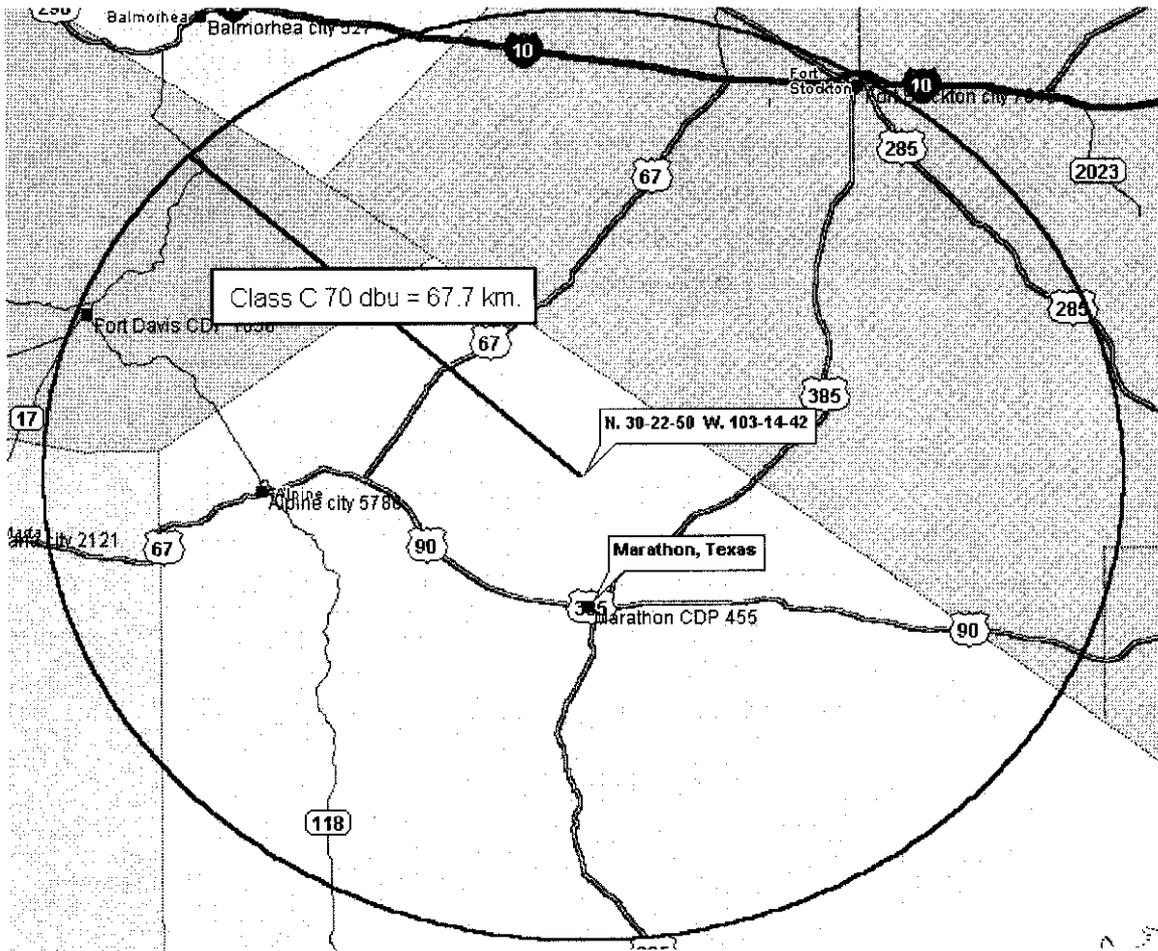
In contrast, Mertzon, Texas receives aural services from several stations, and has been allocated Channel 266A. Channel 240C2 is also proposed for Mertzon. The allocation of Channel 278C2 to Mertzon would only satisfy Priority (4) of the

Commission's allotment priorities (other public interest matters), thus the allocation of Channel 278C to Marathon would achieve a preferential arrangement of allotments.

Channel 278C can be allocated to Marathon, Texas at reference coordinates of 30° 22' 50" North Latitude, and 103° 14' 42" West Longitude. From these coordinates, 70 dbu coverage can be provided to the entire area of Marathon, Texas (Ex. #1). Channel 278C at these coordinates is also mutually exclusive with the proposed allocation of Channel 278C2 at Mertzon, Texas (Ex. #2).

Should the Commission allocate Channel 278C to Marathon, Texas, BBB will apply for that allocation. If BBB is granted a construction permit for Channel 278C at Marathon, BBB will promptly construct and operate the permitted facilities.

EX.#1:



EX. #2

Channel Study for Channel 278C at Coordinates:

N. 30° 22' 50"

W. 103° 14' 42"

CH	Class	CallSign	City	State	Co	Status	N	W	Rqd	Dist	Clear
278C2			MERTZON	TX	US	ADD	31 10 9	100 51 41	249	244.36	-4.64
277C1		KCRS-FM	MIDLAND	TX	US	LIC	32 5 11	102 17 11	209	210.02	1.02
2788			LA ROSITA	CI	MX		28 21 25	101 39 50	270	271.8	1.8
224A		KALP	ALPINE	TX	US	LIC	30 19 9	103 37 4	29	36.47	7.46
279C1		KPZA	JAL	NM	US	LIC	32 25 53	103 9 8	209	227.55	18.55
280C			VENTANAS	CH	MX		30 15 56	104 45 37	105	146.27	41.27
27881			CIUDAD JUAREZ	CH	MX		31 44 19	106 29 12	259	344.08	85.07
278B1		XHEMFM	CIUDAD JUAREZ	CH	MX		31 44 19	106 29 12	259	344.08	85.07
281A		KWTR	BIG LAKE	TX	US	LIC	31 11 54	101 27 45	95	193.21	98.21
224C2		NEW	SHEFFIELD	TX	US	ADD	30 33 15	101 52 9	35	133.53	98.53

All information contained herein is true and correct to the best of my knowledge and belief. My qualifications are a matter of record with the Federal Communications Commission.

Respectfully submitted,

Big Bend Broadcasting

By: 
James S. Bumpous
General Partner

Dated October 14, 2002 Big Bend Broadcasting
13915 Lakeview Dr.
Austin, Texas 78732

Certificate of Service

I certify that on this 14th day of October, 2002, I caused to be sent by U.S. Mail, postage prepaid, copies of the foregoing Counterproposal to the following:

Linda Crawford
3500 Maple Avenue
Suite #1320
Dallas, TX 75219

Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW, TW-A325
Washington, DC 20555


James S. Bumpous