

Novcinber 7,2002

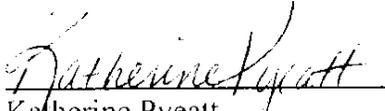
Ms. Marlene H. Dortch
Office of the Secretary
445 Twelfth Street, SW, TW-A325
Washington, D.C. 20554

Re: Petition for Rule Making (MB Docket No. 02-297)
Supporting Comments for Stamford, Texas

Dear Ms. Dortch:

Enclosed is an original and four (4) copies each of Petitioner's Comments for Stamford, Texas.

Respectfully submitted,


Katherine Pyeatt
6655 Aintree Circle
Dallas, Texas 75214
(214) 363-6030 Tele

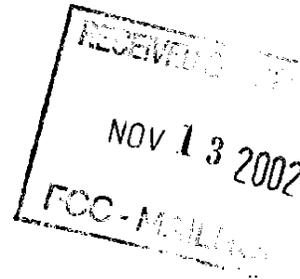
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**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Amendment of 73.202 (b))
Table of Allotments)
FM Broadcast Stations)
(Stamford, TX))

MB Docket No. 02-297
RM-10572

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



PETITIONER'S COMMENTS

1. Petitioner respectfully submits that the public interest would be served by allocating Channel 233A to Stamford, Texas, as that community's first competing FM service. Stamford is currently served by KVRP AM and KOES FM. Stamford is an incorporated city with a population of 3,213 people as of January 1, 1998 according to the Texas Slate Data Center. As of March 1999, 261 business establishments in Stamford had been given a credit rating by Dun & Bradstreet. Stamford has its own mayor, Lewis Johnson, its own fire department, its own city hall, its own post office, school district and a number of local churches.

2. As the Commission is aware, this is one of a number of petitions filed by this Petitioner and other like-minded petitioners. The purpose of filing such petitions is to seek allotments to relatively small communities which are sufficiently removed from major metropolitan areas that there is no prospect that the allotment is merely a step to inaugurate still another facility serving a major broadcast market. These petitions seek allotments to relatively small communities in their own right. For reasons slated above,

the instant petition merits the requested allotment under established principles in Section 307(b) of the Communications Act.

3. The filing of a number of similar petitions has its genesis in the recent development in radio broadcasting of Localized Network Programming. This is a concept that has been developed by the major broadcasters for essentially mid to major markets. It is an approach that provides the economy of a network but the feel and appearance of local programming. The belief of the Petitioner and like-minded petitioners is that such a plan will work with small market communities on a regional basis. Given a geographical area, such as Eastern Oklahoma, Western Oklahoma, North East Texas, West Texas, South Texas, etc., the licensees of FM stations in small communities of a given region – whether the petitioners themselves or other licensees who might successfully outbid them for the license – could initiate unique network programming designed specifically for that region and additionally provide localized community inserts, such as local weather, local events, programming from specific remote locations, regional-specific news, public affairs, public service announcements, promotions and other programming giving life to the commission's policy favoring localism in broadcasting. While there would be local sales, the focus would also be in regional network sales, drawing on the advantages of advertising to the region and the unique nature of the region.

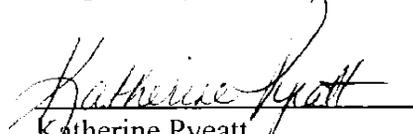
4. The vision is that providing radio service to an area of, say, 5,000 people may not allow for the operation of a traditionally run radio station. However, a network of ten stations in an identifiable geographic area covering, say, 50,000 people could very well be economically viable. This concept is an approach to providing radio service to

clusters of stations in small communities in the nature of modern radio developed by the major group owners for mid and large markets. Such a concept – in lieu of allotting the frequencies to communities in or adjacent to major radio markets – provides a further public interest reason in support of the Petition under Section 307(b).

5. Should this petition be granted, and Channel 233A be allotted to Stamford, Texas Petitioner will apply for Channel 233A, and after it is authorized, will promptly construct the new facility.

The information provided in these Comments is correct and true to the best of my knowledge

Respectfully submitted,


Katherine Pyeatt
6655 Aintree Circle
Dallas, Texas 75214
(214) 363-6030 Tele

cc: Gene A. Bechtel, Law Office of Gene Bechtel, suite 600, 1050 17th Street, N. W. , Washington, D.C. 20036, telephone (202) 496-1289, telecopier (301) 762-0156, attorney for the Petitioner. It is requested that the Commission and any parties who may file pleadings in the captioned matter serve copies to Mr. Bechtel as well as the Petitioner.

November 7, 2002

Stamfordcom