

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

In the Matter of	)	
	)	
Amendment of 73.202 (b)	)	MB Docket No. 02-370
Table of Allotments	)	RM-10612
FM Broadcast Stations	)	
(Turkey, TX)	)	

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 269A to Turkey, Texas as that community's first local FM service Turkey is an incorporated city with a population of 551 people as of January 1, 1998 according to the Texas Slate Data Center. Turkey has its own mayor, Pat Carson, its own school system, its own post office, its own volunteer fire department, its own city hall and a number of local churches. The proposed channel 269A will provide additional diversity and an outlet for local self-expression to Turkey residents and therefore is in the public interest.

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

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allotments to relatively small communities in their own right. For reasons stated 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.

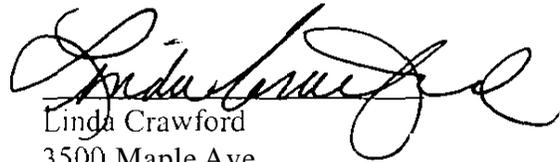
4 The vision is that providing radio service to an area of, say, 5,000 people may not allow for the operation of a traditionally run radio station. However, a network of ten stations in an identifiable geographic area covering, say, 50,000 people could very

well be economically viable. This concept is an approach to providing radio service to clusters of stations in small communities in the nature of modem 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 **269A** be allotted to Turkey, Texas, Petitioner will apply for Channel 269A, and after it is authorized, will promptly construct the new facility.

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

Respectfully submitted,



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cc: Gene A. Bechtel, Law Office of Gene Bechtel, suite 600, 1050 17<sup>th</sup> 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.

December 30, 2002

Linda Crawford