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

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| In the Matter of<br><br>Amendment of Section 73.202(b)<br>Table of Allotments,<br>FM Broadcast Stations.<br>(Benjamin, Texas) | ) | MM Docket No. 01-131 |

and

| | | |
|---|---|---|
| In the Matter of<br><br>Amendment of Section 73.202(b)<br>Table of Allotments,<br>FM Broadcast Stations.<br>(Mason, Texas) | ) | MM Docket No. 01-133 |

To: The Commission

REPLY TO OPPOSITION TO
APPLICATION FOR REVIEW

The opposition does little to advance discussion of the case. It ignores our analysis of precedent in the application for review and the only new citation that it gives, at 4, is to a clear channel AM proceeding which by definition has nationwide application, bearing no similarity or rational relationship to APA notice requirements flowing from an isolated, limited-power FM allotment for the tiny, remote community of Quanah, Texas.

At the risk of continuing to seem incoherent, opposition at 8, forgive us if we take the innocent role of the Quanah petitioner in relation to Rawhide and its colleagues with an exceedingly large grain of salt. No sworn statement of Mrs.

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Dreschel has ever been provided. No sworn statement of any of the principals of Rawhide or its colleagues has ever been supplied. These parties are on record as having repeatedly thumbed their nose at the FCC when it demanded that they produce a document which the Commission determined had a bearing on its public interest duties.

On the one hand, the opposition, at 7-8, faults Mr. Crawford for not having been diligent in filing his Mason and Benjamin petitions earlier. On the other hand, the opposition, at 7, faults Mr. Crawford for filing numerous other petitions reflecting an extraordinary record of rulemaking diligence. The opposition's continued demeaning stance regarding Mr. Crawford's efforts to reserve FM spectrunm against the onslaught of big city broadcasters is 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 colleagues wanted to create no fewer than four 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 out of Section 307(b) 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

February 3, 2003

CERTIFICATE OF SERVICE

I certify that on this 3rd day of February, 2003, I have caused copies of the foregoing REPLY TO OPPOSITION TO APPLICATION FOR REVIEW to be placed in the United States mails, postage prepaid, first class, addressed to the following:

Mark N. Lipp, Esq.
Shook Hardy & Bacon, LLP
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005

Lawrence N. Cohn, Esg.
Cohn and Marks, LLP
1920 N Street, N.W.
Suite 300
Washington, D.C. 20036

Co-counsel for Rawhide Radio L.L.C.

Maurice Salsa
5615 Evergreen Valley Drive
Kingwood, Texas 77345

Gene A. Bechtel