

DOCKET FILE COPY ORIGINAL  
*Law Office of*  
**DENNIS J. KELLY**  
Post Office Box 41177  
Washington, DC 20018

TELEPHONE: 888-322-5291  
202-293-2300

TELECOPIER: 410-626-1794  
E-MAIL: dkellyfclaw1@comcast.net

MEMBER, DISTRICT OF COLUMBIA BAR ONLY,  
PRACTICE LIMITED TO FEDERAL COURTS AND AGENCIES

September 5, 2003

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Honorable Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

**RE: MB Docket No. 03-142**

Dear Madame Secretary:

Please accept for filing on behalf of our client WKJF Radio, Inc. an original and four copies of "Reply Comments" in the above-referenced docket.

Should additional information be desired in connection with the above matter, kindly communicate with this office.

Very truly yours,



Dennis J. Kelly

cc: See Attached Certificate of Service

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BEFORE THE  
**Federal Communications Commission**  
WASHINGTON, D C 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Section 73.202(b), ) MB Docket No. 03-142  
Table of Allotments, ) RM-10539  
FM Broadcast Stations )  
(Glen Arbor, Michigan) )

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

**REPLY COMMENTS**

WKJF Radio, Inc. ("WKJF Radio"), licensee of FM Broadcast Station WJZQ, Channel 225C1 (92.9 MHz), Cadillac, Michigan, hereby respectfully submits these Reply Comments in support of the deletion from the FM Table of Allotments, 47 C.F.R. §73.202(b), of Channel 227A currently allocated to Glen Arbor, Michigan. In support whereof, the following is shown:

1. WKJF Radio filed Comments in this docket on August 22, 2003, as did George S. Flinn, Jr. We are unaware of anyone else who filed Comments.

2. The **Notice of Proposed Rulemaking** in this docket called for any proponent of the retention of Channel 227A at Glen Arbor to demonstrate the availability of a transmitter site which could provide line-of-sight city-grade coverage to Glen Arbor. Mr. Flinn's comments failed to make such a

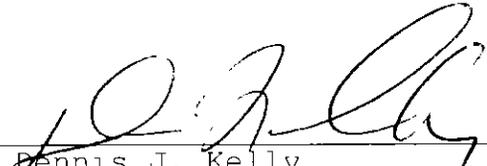
showing; rather, Mr. Flinn requested that the Commission not act in this matter until his "Application for Review" of the dismissal of his Glen Arbor application has been acted upon.

3. Since no proponent of the retention of Channel 227A at Glen Arbor has come forth to timely make a showing of the availability of a transmitter site which will allow a Glen Arbor station on Channel 227A to meet all FCC technical rules, the Commission has no choice but to delete Channel 227A from the FM Table of Allotments.

**WHEREFORE,** it is urged that the Commission delete Channel 227A from Glen Arbor, Michigan, and simultaneously grant the application of WKJF Radio, Inc. (File No. BMLH-20020517AAG) to remove the "Section 73.215 Condition" from the license of FM Broadcast Station WJZQ, Cadillac, Michigan.

Respectfully submitted,

**WKJF RADIO, INC.**

By   
Dennis J. Kelly  
Its Attorney

LAW OFFICE OF DENNIS J. KELLY  
Post Office Box 41177  
Washington, DC 20018  
Telephone: 202-293-2300

September 5, 2003

**CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing "Reply Comments" was served by first-class United States mail, postage prepaid, on this 5<sup>th</sup> day of September, 2003 upon the following:

Stephen C. Simpson, Esquire  
1090 Vermont Avenue, NW, Suite 800  
Washington, DC 20005  
Counsel for George S. Flinn, Jr.

  
Dennis J. Kelly