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Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

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In the Matter of)
)
Amendment of Section 73.202(b)) MB Docket No. 04-206
Table of Allotments,) RM-10705
FM Broadcast Stations.)
(Pioche, Nevada))

COMMENTS OF REC NETWORKS

1. REC Networks ("REC") is a supporter of locally owned and diverse radio. REC currently operates several Internet only radio stations. REC also operates several websites including the original LPFM Channel Search Tool¹. REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners. REC also follows issues that involve the availability of media in rural and underserved areas especially within our area of interest of Southern California, Nevada and Arizona.

2. The Commission now has before it a *Petition for Rulemaking* to amend §73.202 of the Commission's Rules to add Channel 268C1 to Pioche, Nevada. Since this is a second aural service, we will not review whether Pioche is a community for allotment purposes since the Commission has already determined that. REC has reviewed this petition and will support it for the reasons herein:

3. *Petition will add first competitive commercial service to Pioche.* Pioche is currently receiving city grade FM service from the existing Pioche licensee KBZB as well as from non-commercial station KLNR, Panaca NV. This allotment will provide the residents and businesses of Pioche and surrounding areas with a choice of local FM stations and a competitive advertising market.

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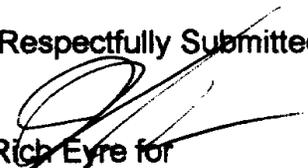
¹ - <http://www.recnet.com/lpfminfo>

4. *No impact to the future LPFM service.* Whenever REC reviews a petition for rulemaking in our Area of Interest, we review the impact of allotment proceedings on the future of local LPFM services in the area. Even after the assignment of Channel 268C1 to Pioche, several fully-spaced channels will be available for LP-100 stations.

5. *Allotment will not encroach any urbanized areas.* The C1 allotment at Pioche will not provide any 60 dBu service into the Las Vegas or St. George, UT urban areas, therefore boosters can not be placed in the urbanized areas to market the station to an urbanized area. As with any rural allotment, REC will be watching any subsequent activity that would move any allotment closer to an urbanized area and will comment on it at that time.

6. Even though we are concerned that the petitioner is from out of town, the public interest benefits of this allotment outweigh those concerns. For the above reasons, we ask that the Commission grant the allotment of Channel 268C1 at Pioche, Nevada. REC has no intention of filing for this channel.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

This is to certify that a copy of this pleading has been served via US Mail upon the petitioners:

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