

**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

In the Matter of :)
)
) **MB Docket No.**
)
Broadcast Localism)

AMENDED REPLY COMMENTS OF GAMECOCK ALUMNI BROADCASTERS, LLC.

Gamecock Alumni Broadcasters, LLC. (“GAB”), by and through counsel, submits its amended reply comments in the above captioned proceeding and states the following:

ABOUT GAB

GAB is a limited liability company and is the permittee of WXYR-LP Columbia, South Carolina.

REPLY COMMENTS

Of greatest concern to GAB is the flood of FM Translators that other commenters have called the “great translator invasion.” While the Commission has meant well in allowing the use of spectrum that would otherwise lie fallow, the sheer number of applications submitted by a handful of parties is indicative of the need to reform the regulations governing FM translators. To that end, GAB fully endorses the comments of REC Networks filed in this proceeding.

What concerns GAB greatly is that it is highly evident that a handful of non-commercial, educational broadcasters are intent on using the FM translator licensing process to expand the coverage of their stations far beyond the range of their primary licensed facilities and, in the process, escape the concomitant obligations to serve the local community. Indeed, if the Commission were to analyze the programming relayed on many of the existing “distant” translators, it is highly questionable whether these organizations’ primary stations make even the slightest attempts to serve the local community as opposed to targeting a national audience.

GAB urges the Commission to reject the proposal of Mr. Robert Branch, Jr. to allow NCE translators to “upgrade” to Low Power FM because this would allow FM translator owners to circumvent the local programming obligations shared by GAB and its fellow Low Power licensees. GAB agrees with Mr. Branch’s suggestion that Low Power FM licensees and permittees be permitted to own and operate FM translators both within and without the reserved band.

Particularly galling are the comments that Low Power licensees are utilizing technically inferior transmission facilities and technology because these comments are unfounded. GAB, like other permittees, has made a substantial investment in its physical plant and is using transmission equipment supplied by the same manufacturers that have supplied antennas and transmitters to his FM Translator clients.

Indeed, GAB respectfully submits that the Commission should consider revising the Low Power FM regulations to further encourage investment in the development of Low Power FM and assure continued service to the local community. Namely, GAB asks that the Commission consider, in appropriate circumstances, affording LP100 class stations limited primary status as proposed by REC Networks.

GAB also requests that the Commission revise the Low Power FM regulations to permit IBOC operations with a digital sideband power level that is equal to that of its primary analog signal. Under the current IBOC specifications, some analog Low Power FM stations operate with effective radiated power authorizations of less than 100 watts. For that reason, under the current specifications, some Low Power FM stations would be required to broadcast a digital sideband of 1 watt or less. Low Power FM stations should be encouraged to transition to IBOC operations as market forces dictate and should not be precluded from doing so due to technical limitations.

Respectfully submitted,

GAMECOCK ALUMNI BROADCASTERS, LLC

_____/s/_____
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