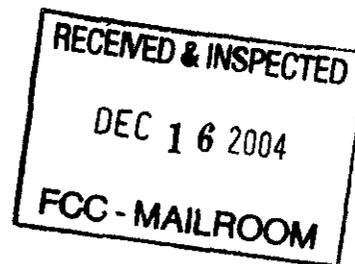


DOCKET FILE COPY ORIGINAL

December 7, 2004



Ms. Marlene Dortch  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
12<sup>th</sup> Street Lobby - TW - A325  
Washington, D.C. 20554

Re: Petition for Rule Making  
Roma, Texas

Dear Ms. Dortch:

Enclosed is an original and four (4) copies of a  
Petition for Rule Making to add Channel 278A at Roma,  
Texas.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles Crawford".

Charles Crawford  
4553 Bordeaux Ave.,  
Dallas, Texas 75205  
(214) 520-7077 Tele

RomaC

No. of Copies rec'd  
List ABCDE

044  
MB 04-206

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

RECEIVED & INSPECTED  
DEC 16 2004  
FCC-MAILROOM

In the Matter of )  
 )  
Amendment of 73.202 (b) ) MB Docket No. \_\_\_\_\_  
Table of Allotments )  
FM Broadcast Stations )  
(Roma, TX) )

To: John Karousos, Assistant Chief  
Audio Division of the  
Media Bureau

PETITION FOR RULE MAKING

Pursuant to 47 C.F.R. 1.401, Charles Crawford respectfully petitions the FCC to institute a Rule Making proceeding to amend the FM Table of Allotments to add Channel 278A at Roma, Texas.

DISCUSSION

Petitioner respectfully submits that the public interest would be served by allocating Channel 278A to Roma, Texas as that community's first competing FM service.<sup>1</sup> Roma, Texas is an incorporated community with a population of 9,617 people.<sup>2</sup> Roma has its own post office, its own school district, the Roma Independent School District, its own fire department, police department and a

<sup>1</sup> KBMI Channel 249A is currently licensed to Roma, Texas.

<sup>2</sup> U.S. Census, 2000

number of local churches. 272 businesses in Roma have been given a credit rating by Dun and Bradstreet as of the last quarter of 2000.<sup>3</sup> Roma is a community that is certainly deserving of an additional local radio station. "Local radio stations play an important role in their communities, providing local news, information and entertainment to residents, and generally serving as good corporate citizens in the local community life. This is particularly true in smaller towns, where the radio stations are limited in number. Yet there are still rural areas of our country that do not have even a local radio station."<sup>4</sup> The proposed Channel 278A will provide additional diversity and an outlet for local self-expression to Roma residents and therefore is in the public interest.

Attached hereto is a channel study confirming that Channel 278A can be allocated to Roma, Texas, consistent with the FCC's FM separation rules. See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992).  
(See, Attachment A)

Reference coordinates for Channel 278A at Roma, Texas are:

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<sup>3</sup> Texas Almanac 2002/2003

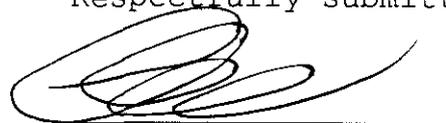
<sup>4</sup> Statement of Commissioner Kevin J. Martin, MM & O, MM docket 99-240, released May 20, 2004.

26 24 00 N  
98 53 00 W

Should this petition be granted and Channel 278A is allotted to Roma, Texas, Petitioner will apply for Channel 278A at Roma and after it is authorized, will promptly construct the new facility.

The factual information provided in this Petition for Rule Making is correct and true to the best of my knowledge.

Respectfully submitted,



Charles Crawford  
4553 Bordeaux Ave.  
Dallas, Texas 75205  
(214) 520-7077      Tele

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, fax (301) 762-0156, attorney for Charles Crawford. 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 Mr. Crawford.

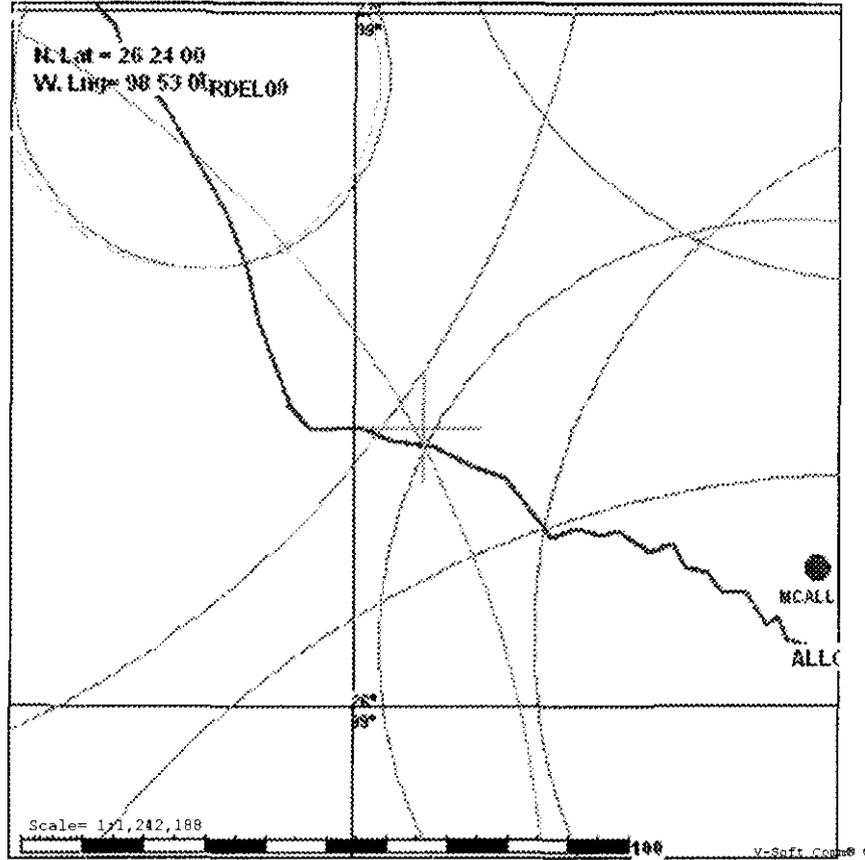
December 7, 2004

Roma

**Attachment A**

(Channel Study for Channel 278A at Roma, Texas)

FM PROSP<sup>(TM)</sup> LOCATE STUDY CH 278 A 103.5 MHz



Dates:  
Data: 12-07-04  
Job : 12-09-04

Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
ALLO.	279C		Monterrey	NL	166.32	240.3	165.0	1.32
XHITSF	279C	OPE	Monterrey	NL	166.32	240.3	165.0	1.32
ALLO.	277A		Reynosa	TA	69.88	119.5	68.0	1.88
ALLO.	277C		Ciudad Anahuac	NL	170.33	306.7	165.0	5.33
XHAHUF	277C	OPE	Ciudad Anahuac	NL	170.33	306.7	165.0	5.33
KBFM	281C0	LIC	Edinburg	TX	109.47	107.5	86.0	23.47
ALLO.	279C		San Fernando	TA	186.97	157.0	165.0	21.97
AP280	280A	APP	Zapata	TX	67.42	327.0	31.0	36.42
VA280	280A	VAC	Zapata	TX	68.31	325.8	31.0	37.31
RDEL	280A	DEL	Zapata	TX	68.31	325.8	31.0	37.31
KDFM	277A	LIC	Falfurrias	TX	121.71	38.3	72.0	49.71

# Roma, TX CH 278A 70 dBu

