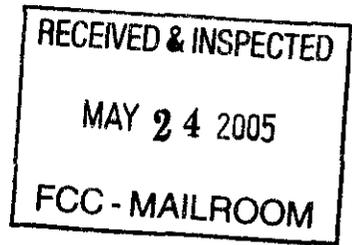


DOCKET FILE COPY ORIGINAL

23 May 2005



Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of Secretary
9300 East Hampton Drive,
Capitol Heights, MD 20743

RE: REPLY COMMENTS,
MB Docket No. 05-131.

Dear Ms. Dortch:

Enclosed is an original and four (4) copies of my REPLY
COMMENTS concerning MB Docket No. 05-131.

Respectfully submitted,

A handwritten signature in cursive script that reads "Michael R. Birdsill".

Michael R. Birdsill
P.O. Box 1921,
Chico, CA. 95927.

No. of Pages 014
List A

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

RECEIVED & INSPECTED
MAY 24 2005
FCC - MAILROOM

In the Matter of)
Amendment of Section 73.202(b)) MB Docket No. 05-131
FM Broadcast Stations) RM-11208
(Redding, California)) RM-11209

TO: Marlene H. Dortch, Secretary
Office of Secretary
Attn: Chief, Audio Division
Media Bureau.

REPLY COMMENTS.

Michael R. Birdsill ("Birdsill"), hereby submits these REPLY COMMENTS in response to the COMMENTS AND COUNTERPROPOSAL filed by Educational Media Foundation ("EMF"), in the Notice of Proposed Rulemaking ("NPRM") referenced above.

Birdsill, who filed his own COMMENTS and COUNTERPROPOSAL in this NPRM, **OPPOSES** the COUNTERPROPOSAL submitted by EMF. Birdsill asserts that his own COUNTERPROPOSAL, which would Allot FM Channel 221A to Cottonwood, California, **as the First Local Station to that Community**, is a higher Priority under the Commission's own Allocation guidelines, rather than EMF's proposal to upgrade FM Station KKRO (FM), Redding, California from a Class A to a Class C2 FM Station. (Revision of FM Policies and Procedures, 90 FCC 2d 88 (1982)).

EMF's proposal to upgrade FM Station KKRO (FM) is mutually exclusive to Birdsill's proposal to Allocate FM Channel 221A at Cottonwood, California, in that the FM Spacing Requirement for a Class A to Class C2, 3rd Adjacent Stations is 55 kilometers

(km). However, the proposed site for EMF's Class C2 upgrade is only 38.3 km from the proposed Allocation site for Cottonwood, California.

Furthermore, Birdsill **OPPOSES** the Allocation of FM Channel 224A to Shasta Lake, California, as that Community's Third FM Station, as proposed by EMF. Birdsill asserts that the Allocation of FM Channel 224A at Shasta Lake, California would severely limit transmitter site selection for FM Channel 221A at Cottonwood, California, given the fact that these Allocations would be Adjacent Channels. In a similar, but more profound manner, Allocation of FM Channel 224A at Shasta Lake, California, would severely limit transmitter site selection for Vacant FM Channel 225A at Burney, California, that Community's Second FM Station. Birdsill notes that the Allocation Site for FM Channel 225A at Burney, California is the center city Reference Coordinates for Burney, California. From Birdsill's own personal knowledge of Transmitter sites near Burney, California, (Birdsill is a Broadcast Engineering Consultant in Northern California), **the ONLY viable Transmitter Site for FM Channel 225A at Burney, California is an Antenna Farm located 9.4 km (5.8 miles) due West of Burney, California.** (Known as "Hatchet Mountain", this area is home to the transmitter sites of KIBC (FM), KNCA (FM), and various FM Translators, all Licensed to Burney, California. Coordinates: 40-52-29, 121-46-13). Birdsill intends to Apply for FM Channel 225A at Burney, California during the appropriate Application Window.

Allocation of FM Channel 224A at Shasta Lake, California,

as that Community's Third FM Station, may also foreclose on the possibility that this Channel (224A) or any of it's Adjacent Channels can be Allocated in the future to a Community as a **First Local Station.**

In compliance with Section 1.52 of the Commission's Rules, the statements and data contained in these REPLY COMMENTS are accurate to the best of my knowledge.

DATE: 23 May 2005

SIGNATURE: Michael R. Birdsill
Michael R. Birdsill
P.O. Box 1921,
Chico, CA. 95927

Certificate of Service.

I, Michael R. Birdsill, hereby certify that a copy of the foregoing REPLY COMMENTS, MB Docket No. 05-131, were sent this 23rd day of May 2005, via First Class U.S. Mail, postage prepaid, to the following:

Educational Media Foundation
c/o Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, N.W.,
Washington, D.C. 20037-1128

SIGNATURE:



Michael R. Birdsill
P.O. Box 1921,
Chico, CA. 95927