

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Amendment of 73.202(b),)
Table of Allotments,)
FM Broadcast Stations.)
(Knoxville, Illinois))

MB Docket No. 05-118
RM-11183

To: Assistant Chief, Office of broadcast License Policy
Media Bureau

**REPLY COMMENT TO COUNTERPROPOSALS FILED BY CUBA RADIO
PARTNERS AND STARBOARD MEDIA FOUNDATION, INC.**

On March 18, 2005, The Federal Communications Commission issued its Notice (“Notice”) of Proposed Rulemaking concerning the above-captioned proceeding as originally filed by petitioner Paul B. Christensen (“Christensen”). Subsequent to the Commission’s Notice, counterproposals were filed by respondents Cuba Radio Partners (“Cuba”) and Starboard Media Foundation, Inc. (“Starboard”).

In it’s counterproposal, respondent Starboard correctly claims that in light of the technical and procedural circumstances affecting the above-captioned proceedings, that the Commission must reserve Channel 291A at Knoxville, Illinois for Noncommercial Educational (“NCE”) use.¹ By conducting a computer-generated area-to-locate study based upon current Commission engineering data, Christensen wholly concurs with that information as presented by Starboard in its counterproposal.

Although Cuba discovered one of many alternate opportunities by potentially re-allocating Channel 291A at Knoxville, IL to Channel 292A at Cuba, IL, Cuba failed to

¹ NCE Second Report and Order, 18 FCC Red 6691 (2003) at 6703-06.

conduct a comprehensive assessment of all the technical and procedural issues involving Christensen's original Petition for Rulemaking. Accordingly, Christensen respectfully requests that the Commission: (i) grant Starboard's counterproposal on its merits; and (ii) reject Cuba's counterproposal for failing to demonstrate that its counterproposal takes procedural precedence over that of Starboard's counterproposal. In such event, Christensen declares that he intends to apply for the requested channel when the opportunity to do so permits.²

Respectfully submitted,

PAUL B. CHRISTENSEN

By: 

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May 23, 2005

² In the event that the frequency is not reserved for NCE use, but rather is reserved for commercial use, Christensen also declares, in the alternative, his present intent to apply for the proposed commercial channel, whenever the Commission opens an appropriate filing window for such applications.

CERTIFICATE OF SERVICE

I, Paul B. Christensen, Esq., hereby certify that I have caused to be served, this 23rd Day of May, 2005 a copy of the foregoing **“REPLY COMMENT TO COUNTERPROPOSALS FILED BY CUBA RADIO PARTNERS AND STARBOARD MEDIA FOUNDATION, INC.”** by First-Class Mail, fees pre-paid, on the following:

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Paul B. Christensen, Esq.

* Courtesy Copy, via overnight delivery