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December 8, 2005

VIA HAND DELIVERY

Ms. Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
Portals II – 12th Street Lobby
Filing Counter – TW-A325
445 12th Street, SW
Washington, D.C. 20554

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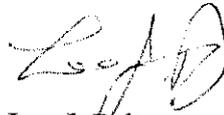
Federal Communications Commission
Office of Secretary

**Re: Comments
MB Docket No. 05-291
RM-11270
(Franklin, Addis and Eunice, Louisiana)**

Dear Ms. Dortch:

Transmitted herewith, on behalf of Radio & Investments, Inc., licensee of Station KDDK(FM), Franklin, Louisiana, is an original and four (4) copies of its Comments in the above-referenced proceeding. Please contact undersigned counsel in the event the Commission has any questions with respect to this filing.

Sincerely,



Lee J. Peltzman
Counsel for
RADIO & INVESTMENTS, INC.

LJP/kdm

Enclosure

12/8/05 10:44 AM
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**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.202(b))	
Table of Allotments)	MB Docket No. 05-291
FM Broadcast Stations)	RM - 11270
(Franklin, Addis and Eunice, Louisiana))	
)	

To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

COMMENTS

Radio & Investments, Inc. (“R & I”), licensee of Station KDDK(FM), Franklin, Louisiana, by its counsel, hereby submits its Comments in support of the proposal set forth in the Commission *Notice of Proposed Rule Making* in the above-captioned proceeding, DA 05-2717, released October 17, 2005 (the “*NPRM*”). The *NPRM* sought to amend the Commission’s Table of FM Allotments, Section 73.202(b) of the Commission’s rules, in order to re-allot FM Channel 288A from Franklin, Louisiana to Addis, Louisiana, and to modify the license for KDDK accordingly to reflect the new community. In order to accommodate the re-allotment, the *NPRM* also proposed a change in the reference coordinates for Station KEUN-FM, Channel 288A, Eunice, Louisiana.¹

R & I incorporates by reference its Petition for Rule Making filed in the instant proceeding. As R & I previously demonstrated, adoption of the proposal contained in the *NPRM*

¹ Tri-Parish Broadcasting Incorporated (“Tri-Parish”), licensee of KEUN-FM, has consented to the proposed change and R & I has agreed to reimburse Tri-Parish for its reasonable expenses in making changes to its facilities.

would serve the public interest as it would enable R & I to provide the community of Addis, an incorporated town that is not located within any urbanized area, with its first local aural transmission service without depriving Franklin of local broadcast service. R & I reiterates its expression of interest in the re-allotment of Channel 288A to Addis and the modification of Station KDDK to reflect the new community. R & I reaffirms its commitment, should its proposal set forth in the instant proceeding be adopted, to expeditiously file an application for modification of the license of KDDK to reflect Addis as the station's community of license and, upon grant of that application, to promptly construct as proposed.

In its *NPRM* the Commission noted that Addis was not located within an urbanized area and that the proposed change in community would cause KDDK to place a 70 dBu signal contour over only 13.4 percent of the Baton Rouge Urbanized Area. Because that coverage would be substantially less than 50 percent, the Commission tentatively concluded that no *Tuck* analysis was necessary.² The Commission invited interested parties to demonstrate the feasibility of locating the KDDK transmitter at a site that would enable the station to provide a 70 dBu signal to more than 50 percent of the urbanized area. In the event such information were presented in this proceeding, the Commission reserved the right to require R & I to provide a *Tuck* analysis. R & I does not believe that it is feasible to locate a transmitter site for Station KDDK that would enable the station to provide a 70 dBu signal to more than 50 percent of any urbanized area. However, in the event such information is presented in timely filed Comments, R & I will provide a *Tuck* showing in its Reply Comments filed in this proceeding.

² See *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988).

In view of the above, R & I respectfully urges the Commission to expeditiously adopt the *NPRM* proposal and amend the FM Table of Allotments to re-allot Channel 288A from Franklin to Addis, Louisiana, change the reference coordinates for Station KEUN-FM, Channel 288A, Eunice, Louisiana and modify the R & I license for KDDK, accordingly.

Respectfully submitted,

RADIO & INVESTMENTS, INC.

By: 

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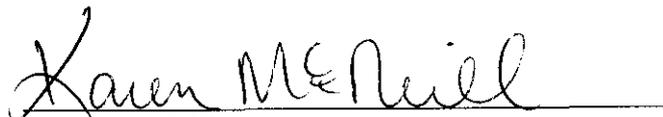
Date: December 8, 2005

CERTIFICATE OF SERVICE

I certify that on this 8th day of December, 2005, I caused to be sent by U.S. mail, postage prepaid, copies of the foregoing Petition for Rule Making to the following:

John A. Karousos*
Federal Communications Commission
445 12th Street, S.W., Room 3-A266
Washington, DC 20554

Tri-Parish Broadcasting Incorporated
P.O. Box 1049
330 West Laurel Avenue
Eunice, Louisiana 70535
Attn: Roger W. Cavaness


Karen McNeill

*Via Hand Delivery