

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

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Federal Communications Commission
Office of Secretary

In the Matter of

Amendment of §73.202(b))
Table of Allotments) MB Docket No. 05-282
FM Broadcast Stations)
(Rockmart and Aragon, Georgia, and) RM - 11229
Lynchburg and Chattanooga, Tennessee)

To: Marlene Dortch, Secretary
Attn: Audio Division, Media Bureau

REPLY COMMENTS

Woman's World Broadcasting, Inc. ("WWB"), by its attorney, hereby respectfully submits the following Reply Comments in this proceeding:

1. By *Notice of Proposed Rulemaking*, released October 14, 2005, the Audio Division acted favorably on the proposal submitted by WWB, the licensee of Station WTSH-FM, Channel 296C2, Rockmart, Georgia. WWB proposes to change the community of license for Station WTSH-FM from Rockmart to Aragon, Georgia, and to upgrade from Channel 296C2 to Channel 286C1. In a Counterproposal, filed in this proceeding by J. L. Brewer Broadcasting of Cleveland, LLC and J. L. Brewer Broadcasting, LLC (collectively, "Brewer"), the question was raised whether Station WTSH-FM can provide the requisite city-grade service to Aragon, Georgia, if WWB's proposal is granted.

2. Brewer and WWB are filing Joint Reply Comments, in which Brewer withdraws and withdraws its "line of sight" objection. In the meantime, however, just to remove any question, WWB's consulting engineer, Clyde Scott, has calculated the city

coverage of Aragon, based on both the Commission's 50-50 curves and Longley-Rice. An appropriate statement from Mr. Scott is attached.

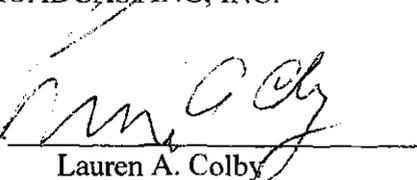
3. Under the case law, Longley-Rice can be used as a supplementary allocations tool, where the pertinent Delta H (terrain roughness factor) exceeds 100 meters. *Milano, Texas*, 19 FCC Rcd 8474 (Audio Division 2004). Here, as Mr. Scott shows, the terrain roughness factor is well in excess of 100 meters. Furthermore, based upon both Longley-Rice and the 50-50 curves, Station WTSH-FM, as modified, will more than provide adequate city-grade coverage of Aragon, Georgia.

December 20, 2005

Law Office of
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Respectfully submitted,

WOMAN'S WORLD
BROADCASTING, INC.

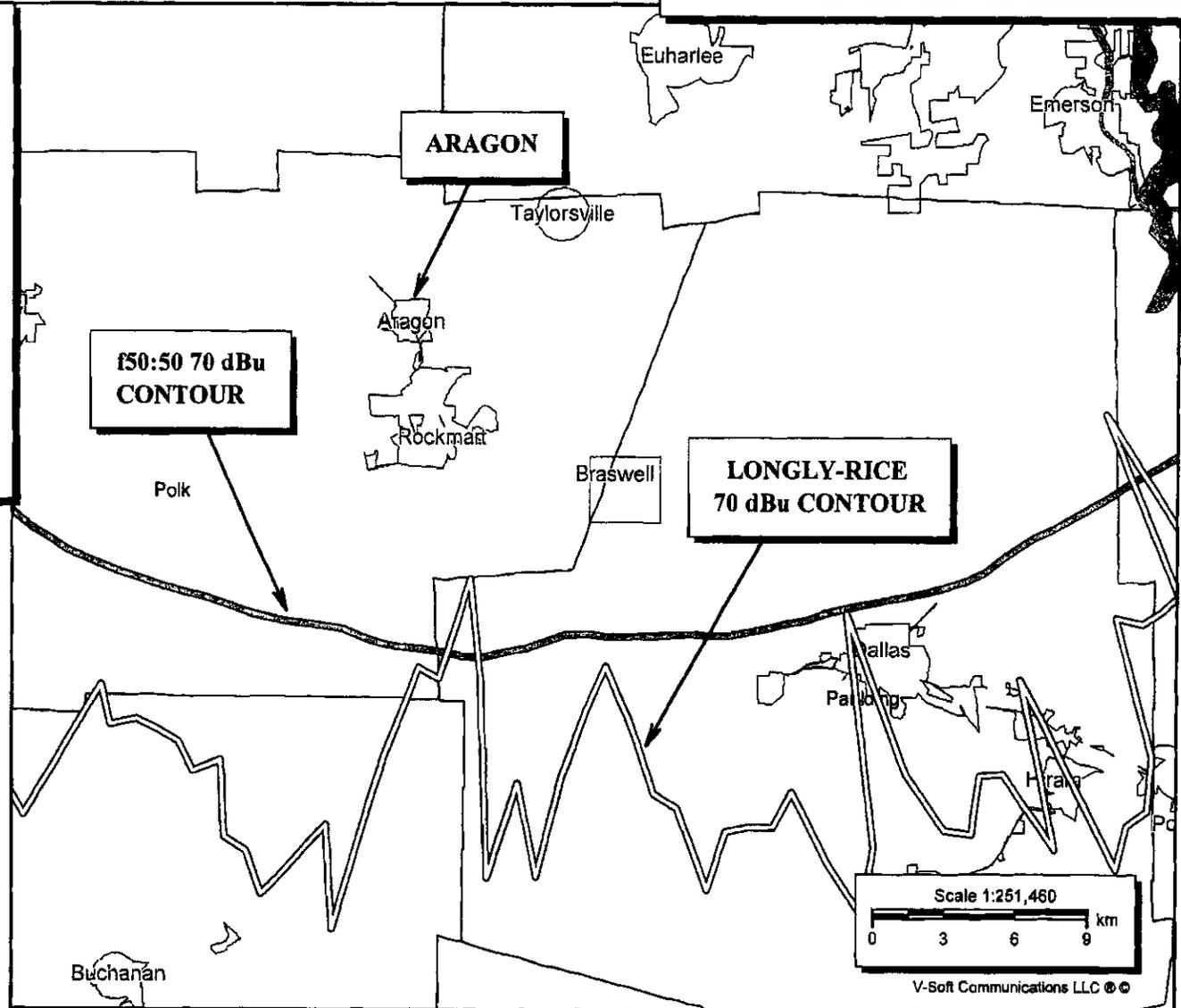
By 

Lauren A. Colby
Its Attorney

EME COMMUNICATIONS - MOULTRIE, GA.

RADD
 Latitude: 34-22-02 N
 Longitude: 084-58-33 W
 ERP: 100.00 kW
 Channel: 296
 Frequency: 107.1 MHz
 AMSL Height: 542.883 m
 Elevation: 237.05 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: Longley/Rice
 Climate: Cont temperate
 Conductivity: 0.0050
 Dielec Const: 15.0
 Refractivity: 311.0
 Receiver Ht AG: 9.1 m
 Receiver Gain: 0 dB
 Time Variability: 50.0%
 Sit. Variability: 50.0%
 ITM Mode: Broadcast

- > 100.0 dBu
- 90.0 - 100.0
- 80.0 - 90.0
- 70.0 - 80.0
- 60.0 - 70.0
- 50.0 - 60.0



Scale 1:251,460
 0 3 6 9 km

CERTIFICATE OF SERVICE

I, Kelli A. Muskett, a secretary in the law office of Lauren A. Colby, do hereby certify that copies of the foregoing have been sent via first class, U.S. mail, postage prepaid, this 20th day of December, 2005, to the offices of the following:

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Audio Division, Media Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

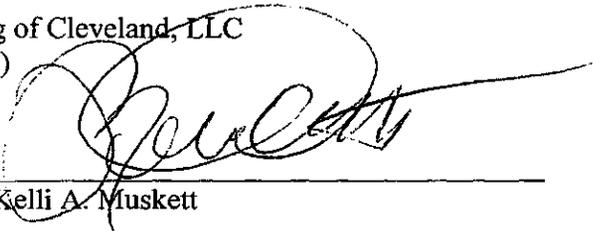
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Kelli A. Muskett