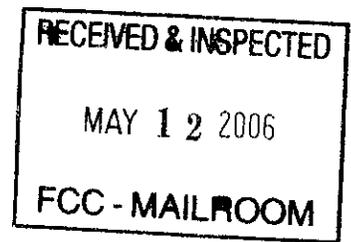


From: Matthew Wesolowski
SSR Communications, Inc.
5270 West Jones Bridge Road
Norcross, GA 30092



To: John Karousos
Cc: Bart Gorman
(Assistant Chief, Audio Division)
Media Bureau
Federal Communications Commission
445 12th Street SW
TW-A325
Washington, DC 20554

Re: SSR Communications, Inc., Counterproposal in MB Docket No. 06-52, RM-11318, Allotment of FM Channel 280A at Flora, Mississippi.

Wednesday, May 10, 2006

Dear Mr. Karousos:

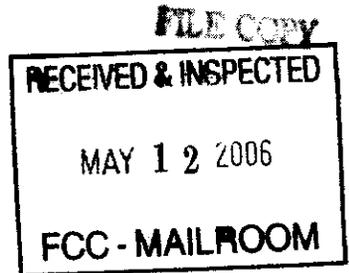
I have taken some time to speak with Mr. Gorman over the past few days and have discovered that he does not yet have a copy of our counter-proposal in the above-mentioned proceeding. I filed this counter-proposal within the comment period deadline of April 24, 2006. I have included two date-stamped copies of the counterproposal, which had been filed at the Commission's Massachusetts Avenue filing office on April 24, 2006. I hope these copies help you locate the originals. Please call me at the number below with any questions that you may have.

Sincerely

A handwritten signature in black ink, appearing to read "Matthew Wesolowski".

Matthew Wesolowski
Chief Executive Officer
SSR Communications, Inc.
601-201-2789

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



In the Matter of)
) MB Docket Number 06-52
Amendment of Section 73.202(b))
Table of Allotments) RM-11318
FM Broadcast Stations)
(Hermanville and Flora, Mississippi))

RECEIVED - FCC

To: Chief, Allocations Branch
Policy and Rules Division
Media Bureau -

APR 24 2006

Federal Communication Commission
Bureau / Office

COUNTERPROPOSAL

SSR Communications Incorporated ("SSR") hereby submits this Counterproposal in the above-mentioned proceeding, to assign FM Channel 280A to Hermanville, Mississippi as that community's *first* FM broadcast service, as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Hermanville, Mississippi	---	280A
Flora, Mississippi	247C3	247C3 (no change)

In the original petition for rulemaking, MissAla RF ("MissAla") asked that the Commission allot FM Channel 280A to Flora, Mississippi, as that community's second FM service. This counterproposal would result in a *preferential arrangement of the FM Table of Allotments*. MissAla seeks to bring a second FM service to Flora, but SSR asserts that *first* service to Hermanville would take a higher priority in the Commission's established methods for comparing allotments. The placement of FM Channel 280A at Hermanville would be mutually-exclusive to MissAla's proposal. Furthermore, SSR states that it could find no alternate FM Channels at either Flora or Hermanville.

SSR believes that the citizens of Hermanville are entitled to a first local FM service. The community of Flora is already well-served by *thirty-one radio stations* (fourteen full-power commercial FM radio stations, five full-power noncommercial FM radio stations, and twelve full-power commercial AM radio stations). The community of Hermanville has *no* local FM service, and there are no stations closer than thirteen miles from Hermanville. Of the thirteen total radio stations providing service to Hermanville, all but two have facilities *more than thirty miles away*. Clearly, the community of Hermanville needs a first local FM service.

Not only does Hermanville need a first FM service, an allotment placed at Flora would truly be an attempt to serve the much larger Jackson, Mississippi radio market. A Class A FM radio facility placed at MissAla's reference coordinates would cover nearly 100% of the city of Jackson with a protected-grade contour. Furthermore, fully-spaced reference coordinates exist to the East of MissAla's proposed tower. A facility from another location could serve even more of the Jackson market.

Hermanville is a *bona-fide community* for allotment purposes. According to 2005 U.S. Census estimates, there are 2,309 residents with a Hermanville address. The city of Hermanville is a transportation, industrial, and commercial center for the surrounding area. Although Hermanville is not incorporated (though it has been an incorporated community in the past), it has its own zip code and post office (39086), its own local telephone exchange (601-535-XXXX), a local water association, multiple apartment complexes, a fire department, numerous churches, many businesses, 100+ employee industries, and the general requisites for the definition of a community.

Representatives of SSR have made great efforts to spend time in Hermanville. Local resident Alma Howard, who works for Hermanville's largest employer, the Southern Lumber Company, stated that she would "look forward to Hermanville having a station." Mrs. Harold Banks, also of Hermanville, expressed similar sentiments. Many other residents have expressed concern that Hermanville does not have sufficient radio-based media in the area. The closest radio stations to the area serve other communities. WRFM-FM, licensed to nearby Port Gibson, Mississippi, maintains its studios in Vicksburg, Mississippi, roughly twenty-five miles away. Noncommercial station WATU-FM, also licensed to Port Gibson, is owned by a large religious organization (with 119 other radio stations) and has no local presence. The other radio stations in the area primarily serve markets that are far away from Hermanville.

TECHNICAL SUMMARY

As demonstrated in the attached engineering study (attached hereto as Exhibit 1), FM Channel 280A can be assigned to Hermanville using the reference coordinates of 31-55-58 N, 90-42-13 W. From this site, both Sections 73.315 and 73.207 of the Commission's Rules are satisfied: the site covers the entire community of Hermanville in a signal strength of 3.16 mV per Meter or greater, and the site is free of interference from other facilities. This location requires a site restriction of approximately 13.1 kilometers East of Hermanville. This site restriction is necessary to avoid a short-spaced location with respect to station KJLO-FM at Monroe, Louisiana.

CERTIFICATIONS

SSR certifies that, although it did not use legal counsel in this matter, that the information contained herein is accurate to the best of our knowledge. SSR has sent a copy of this counterproposal to MissAla RF at the following address:

**Heather Hill
MissAla RF
2035 Placentia Avenue, C1
Costa Mesa, CA 92627**

CONCLUSION

With this timely-filed counterproposal (filed April 24th, 2006), SSR asserts that first local service to Hermanville is preferable to second local service to Flora. In the event that the Commission grants the SSR counterproposal, SSR affirms that it will file the appropriate application(s) to operate a new FM broadcast facility at Hermanville, and, if authorized, will build out the station promptly.

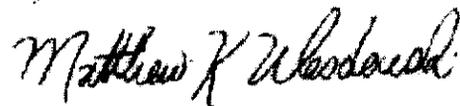
Dated: April 24, 2006

SSR Communications, Inc.
5270 West Jones Bridge Road
Norcross, GA 30092-1628
(601) 201-2789

Respectfully Submitted,

SSR Communications, Inc.

By:



Matthew K. Wesolowski
Chief Executive Officer

EXHIBIT 1: ENGINEERING STUDY

From the proposed reference site, FM Channel 280A is clear of all shortspacings, with the exception of station KJLO-FM as a Full Class C facility. Station KJLO-FM at Monroe, Louisiana, is presently a Class C station operating below its minimum antenna height of 451 Meters HAAT. Therefore, SSR requests that the Commission treat KJLO-FM as a C0 facility for the purposes of this counterproposal. Should New South Communications, Inc. (the licensee of KJLO-FM) elect not to build out a Class C facility, then Commission policy dictates that KJLO-FM should be ordered to show cause why it should not be reclassified as a Class C0 facility. SSR acknowledges that KJLO-FM has an unbuilt construction permit for another facility, but even a Full Class C station at that tower location would not create a shortspacing issue with FM Channel 280A at Hermanville. Furthermore, a fully-spaced Class C reference site exists for KJLO-FM on FM Channel 281C at 32-42-23 N, 92-11-40 W. These reference coordinates require a modification of the reference coordinates for station KBEF-FM at Gibsland, Louisiana, a fully-spaced Class A facility at 32-29-07 N, 93-11-12 W. SSR will bear the reasonable and legitimate costs, if any, of changing these reference coordinates.

FM Allotment Separations Table

Community of Hermanville, Mississippi
Channel 280A - 103.9 FM

<u>Call</u>	<u>Channel</u>	<u>Class</u>	<u>Type</u>	<u>Community</u>	<u>St</u>	<u>Dist</u>	<u>Reg Dist</u>	<u>Diff</u>	<u>Result</u>	
-	280 A	FR	ADD	FLORA	MS	71.10	115.00	43.90	Short	*
KJLO-FM	281 C	FM	LIC	MONROE	LA	153.28	165.00	11.72	Short	**
KJLO-FM	281 C	FS	LIC	MONROE	LA	153.28	165.00	11.72	Short	**
KJLO-FM	281 C	FA	USE	MONROE	LA	153.28	165.00	11.72	Short	**
KJLO-FM	281 C	FA	PROP	MONROE	LA	164.55	165.00	0.45	Close	****
WMJU	282 C3	FM	LIC	BUDE	MS	41.52	42.00	0.48	Close	
KJLO-FM	281 C0	FA	PROP	MONROE	LA	153.28	152.00	-1.28	Close	**
950503MC	282 C3	FA	USE	BUDE	MS	43.60	42.00	-1.60	Close	
-	279 A	FR	ADD	WISNER	LA	74.67	72.00	-2.67	Close	
WUSW	279 C0	FM	LIC	HATTIESBURG	MS	155.29	152.00	-3.29	Close	
WUSW	279 C0	FA	USE	HATTIESBURG	MS	155.29	152.00	-3.29	Close	
-	279 C0	FR	ADD	HATTIESBURG	MS	155.29	152.00	-3.29	Close	
-	279 C0	FR	ADD	HATTIESBURG	MS	155.29	152.00	-3.29	Close	
-	279 C0	FR	ADD	HATTIESBURG	MS	155.29	152.00	-3.29	Close	
KJLO-FM	281 C	FM	CP	MONROE	LA	171.55	165.00	-6.55	Okay	***
-	280 A	FA	VAC	BORDELONVILLE	LA	128.14	115.00	-13.14	Okay	
KBYO-FM	283 C3	FA	USE	TALLULAH	LA	62.36	42.00	-20.36	Okay	
KBYO-FM	283 C3	FM	CP	TALLULAH	LA	62.85	42.00	-20.85	Okay	

* this entry represents the initial petitioner's proposed allotment

**KJLO-FM is a Class C facility with an antenna height below 451 Meters HAAT. At this site, KJLO-FM shall be treated as a Class C0 allotment.

***KJLO-FM has a CP to maintain a Class C facility, but at a site that is also fully space to the proposed allotment at Hermanville

****KJLO-FM's reference coordinates for a full Class C site at 32-42-23 N, 92-11-40 W.

HERMANVILLE

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FIGURE 1: A map of Hermanville, courtesy of <http://maps.google.com>

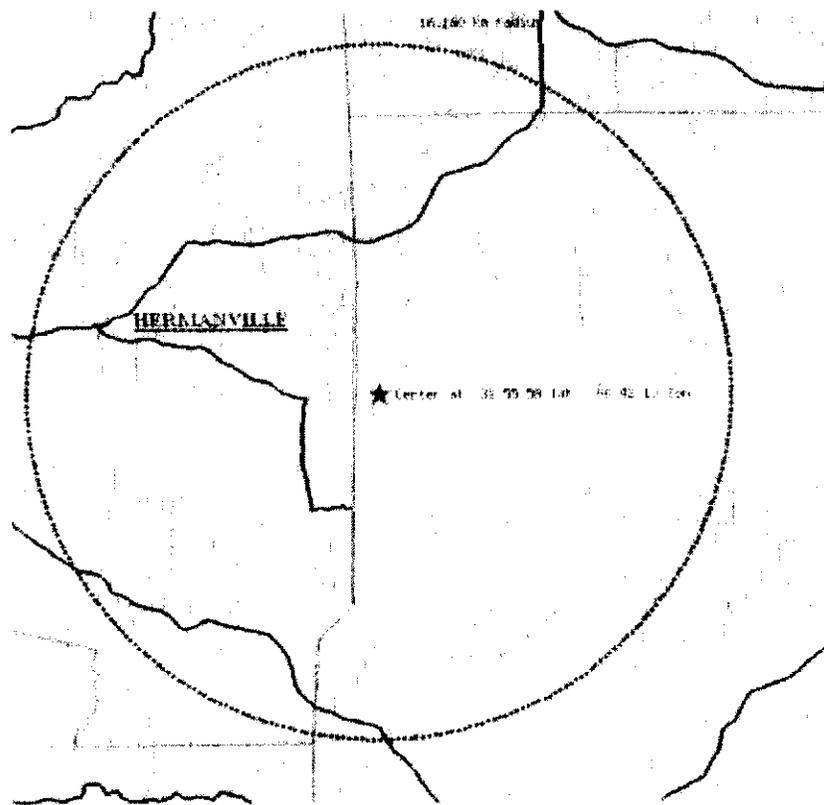


FIGURE 2: 70 dBu coverage of the proposed facility