

Denise Berger

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From: Gene Wisniewski [genew@worldradiolink.com]
Sent: Monday, July 31, 2006 9:31 PM
To: MMBSecretary
Subject: Comments to NPRM MB Docket 06-88, RM-11254

Secretary Dortch,
I am sending this e-mail again. The PDF attachment may have stripped from the first e-mail I sent you.
Gene

Secretary Dortch,
Please find attached the Comments of WRL in response to the Notice of Proposed Rule Making, MB Docket No. 06-88, RM-11254, which needs to be brought to the attention of the Assistant Chief, Audio Division, Media Bureau.
William provided me with the above e-mail address as an alternative to faxing this information to Shirley. If you need additional information, please contact me.

The above Comments have been mailed to Frederick A. Polner and Bittersweet Broadcasting, Inc. In addition 5 copies were mailed by first class mail to your Office at the 445 12th Street SW address.

Dr. Gene Wisniewski, PhD
Broadcast Engineer
World Radio Link, Inc.
phone (208) 733-3551 ext 12
e-mail genew@WorldRadioLink.com

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Monday, July 31, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445-12th Street, SW
Washington, DC 20554

RE: **Petition for Rulemaking to Amend the FM Table of Allotments**
MB Docket No. 06-88
RM-11254

Dear Secretary Dortch:

Mailed on behalf of World Radio Link, Inc., please find an original plus five (5) copies of COMMENTS AND STATEMENT OF INTENTION concerning the above mentioned proceeding

Included in this packet, is a self addressed, stamped envelope. Please Date Stamp one copy and mail back to World Radio Link.

If you should have any questions concerning these comments, please contact the undersigned.

Respectfully,

A handwritten signature in cursive script that reads 'Gene Wisniewski'.

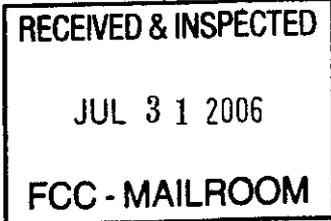
Gene Wisniewski
Chief Broadcast Engineer
World Radio Link, Inc.

Before the
Federal Communications Commission
Washington, DC 20554

In the matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Boonville and Wheatland, Missouri))

MB Docket No. 06-88
RM-11254

To: Chief, Audio Division
Media Bureau, FCC



Comments and Statement of Intention

World Radio Link, Inc. ("WRL") respectfully submits the following comments concerning the proposed rule making proceeding referenced above.

Background

World Radio Link, Inc. ("WRL") is the winning bidder of FM405 Allotment, Wheatland, MO, Facility Id. 165956, auctioned in January 2006 in FCC Auction No. 62. On March 9, 2006 WRL filed with the Commission an application, **BNPH-20060309ABD**, for a construction permit to construct a new FM station on Channel 226A. The application has been twice amended as requested by the Commission.

On June 9, 2006 the Commission released a Notice of Proposed Rule Making in the above referenced proceeding to amend the FM Table of Allotments to show a proposed change of channel for Wheatland, MO from 226A to 272A. WRL received notification of said Notice of

Proposed Rule Making by certified mail from the Commission. In accordance with Sections 1.415 and 1.419 of the Commission's Rules, the Assistant Chief, Audio Division, Media Bureau set July 31, 2006 as the deadline for the filing of Comments for this proceeding. Thus, the subsequent comments filed by WRL are timely filed.

Discussion

WRL is familiar with all rules and regulations concerning the responsibility for reviewing all pending rulemaking petitions and open proceedings that might affect FM allotment(s) on which it bids as expressed in the Public Notice released by the Commission on June 17, 2005 entitled "Notice and Filing Requirements, Minimum Opening Bids, Upfront Payments and Other Procedures for Auction No. 62".

In order to make timely application for the construction permit for Wheatland, WRL submitted said application on channel 226 with the reference coordinates specified by the Commission. The application was subsequently twice amended by WRL to comply with the requests of the Media Bureau, Audio Division. Both amendments were also filed on channel 226A and both amendments were filed in a timely fashion. At no time was WRL requested by the Commission to amend its application to channel 272A.

It is the understanding of WRL that a petition for rulemaking is not a guarantee that the proposed rule will be accepted by the Commission. Wheatland was offered for auction on channel 226A not 272A. If the Commission was seriously considering amending the Table of Allotments it had the time and should have done so before commencement of Auction No. 62. In order to comply with the rules concerning the application for the construction permit in

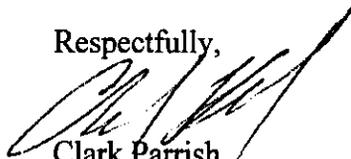
Wheatland, WRL has suffered considerable expense in performing the engineering analysis of all potential transmit sites, legal expenses in filing the necessary applications for construction permit and subsequent amendments to same. WRL also incurred additional expense since it was in the final stages of negotiating a lease agreement with a tower owner for the proposed station on channel 226A. This site is not suitable for broadcasting on channel 272A.

WRL has made all necessary payments to the Commission for the construction permit on channel 226A in anticipation that the FCC will not amend the Table of Allotments as petitioned by Bittersweet Communications.

Conclusion

WRL is respectfully requesting that the Commission honor its contract with WRL for a station at Wheatland , MO on channel 226A and make a speedy decision to deny Bittersweet's petition to Amend the Table of Allotments.

Respectfully,



Clark Parrish
Member, Board of Directors
World Radio Link, Inc.
P.O. Box 5429
Twin Falls, Idaho 83303

July 31, 2006

Certificate of Service

I, Gene Wisniewski, hereby certify that on this 31st day of July, 2006, I caused a copy of the preceding Comments to be served by United States 1st Class Mail on the following:

Bittersweet Broadcasting, Inc.
1600 Radio Hill Road
Boonville, MO 65233

Frederick A. Polner
Rothman Gordon Foreman & Groudine, P.C.
Third Floor, Grant Building
Pittsburgh, PA 15219-2203

Gene Wisniewski

Gene Wisniewski