

BEFORE THE
Federal Communications Commission
WASHINGTON, D. C. 20554

In the Matter of)	
)	
Promoting Diversification of)	MB Docket No. 07-294
Ownership In the Broadcasting)	
Services)	
)	
2006 Quadrennial Regulatory)	MB Docket No. 06-121
Review - Review of the)	
Commission's Broadcast)	
Ownership Rules and Other Rules)	
Adopted Pursuant to Section 202)	
of the Telecommunications Act)	
of 1996)	
)	
2002 Biennial Regulatory Review)	MB Docket No. 02-277
- Review of the Commission's)	
Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to)	
Section 202 of the)	
Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast)	MM Docket No. 01-235
Stations and Newspapers)	
)	
Rules and Policies Concerning)	MM Docket No. 01-317
Multiple Ownership of Radio)	
Broadcast Stations in Local)	
Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244
)	
Ways to Further Section 257)	MB Docket No. 04-228
Mandate and To Build on Earlier)	
Studies)	

TO: Honorable Marlene H. Dortch
Secretary of the Commission

COMMENTS OF IHR EDUCATIONAL BROADCASTING

IHR Educational Broadcasting ("IHR"), licensee of paired existing band station KAHI, 950 kHz, Auburn, California ("Station KAHI") and expanded band station KSMH, 1620 kHz, West Sacramento, California ("Station KSMH"), by its attorney, hereby respectfully submits its Comments in the above-captioned proceeding. In support whereof, the following is shown:

1. IHR limits its comments to the issues relative to so-called "paired stations" related to expanded band AM stations, dealt with in the **Report and Order and Third Further Notice of Proposed Rulemaking**, FCC 07-217, released March 5, 2008 (the "NPRM"), at paragraphs 88-92.

2. IHR is a California non-profit corporation. It operates station KSMH as a 24 hour per day, 7 day per week non-commercial educational AM station, offering Roman Catholic educational and devotional programming. This clean, decent and heartwarming programming reaches shut-ins and prisoners as well as people from all walks of life. IHR offers a program service which truly serves the public interest, convenience and necessity.

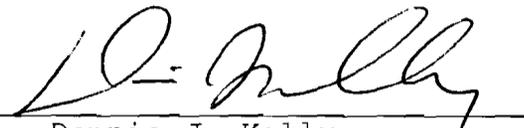
3. When IHR acquired Stations KAHI and KSMH, it entered into a time brokerage agreement with the former licensee of KAHI, who operates that station to provide a local community broadcast service for Auburn, 32 highway

miles northeast of Sacramento, the county seat of Placer County. It is the hope of IHR that it will be able to assign the license for Station KAHI to the time broker, who intends to continue to operate a local broadcast service for Auburn and vicinity. Were the Commission to require that the license for KAHI be turned in for cancellation, this unique local broadcast service at Auburn would be lost. Therefore, it is very much in the public interest for the Commission to adopt the proposals in ¶¶88-92 of the NPRM.

WHEREFORE, IHR Educational Broadcasting urges that the Commission **ADOPT THE RULES** contemplated by ¶¶88-92 of the NPRM, with a clarification that the term "small business entities" shall include non-profit organizations.

Respectfully submitted,

IHR EDUCATIONAL BROADCASTING

By 
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