

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Amendment of Section 73.202(b))
FM Table of Allotments,)
FM Broadcast Stations)
(Asbury, Iowa, Maquoketa, Iowa,)
and Mineral Point, Wisconsin)

MB Docket No. 08-150
RM-11390

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FILED/ACCEPTED

OCT - 7 2008

To: Office of the Secretary

Federal Communications Commission
Office of the Secretary

REPLY COMMENTS OF DODGE POINT BROADCASTING CO., INC.

1. Dodge Point Broadcasting Co., Inc. ("Dodge Point"), licensee of WDMP(AM/FM), Dodgeville, Wisconsin, Facility ID Nos. 17054/17056, by its counsel, hereby respectfully submits its reply comments in the above-referenced proceeding.

2. Dodge Point files these reply comments to stress that KM Radio of Independence, LLC ("KMR"), the petitioner in this proceeding, failed to provide evidence in its Comments, filed September 22, 2008 (the "KMR Comments"), to rebut the fact that Solon, Iowa, KMR's proposed new community of license for KQMG-FM, Independence, Iowa, officially recognizes itself as anything more than a bedroom community of Cedar Rapids and other large nearby cities.¹ Rather, the KMR Comments merely repeats information about Solon that KMR provided in its Petition for Rule Making, filed January 19, 2007 (the "KMR Petition").

3. **The indisputable and pivotal fact in this proceeding remains that Solon, itself, officially recognizes that the tiny town "functions primarily as a bedroom community for the larger cities of Cedar Rapids, Coralville and Iowa City."**² The full Commission has

¹ See KMR Comments, pages 3-5.

² See www.solon-iowa.com, General Solon Information (emphasis added).

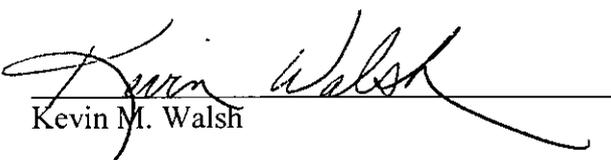
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pledged that “a first local service preference will not be awarded to a community that is largely interdependent with the Urbanized Area or surrounding communities.”³ To award Solon a first local service preference under these circumstances would directly contradict what the Commission assured the public, including broadcasters, would not happen under the new allotment procedures in the *Allotment Order*.

4. For the reasons set forth above and in its Comments and Informal Objection to Applications BNPH-20070119AEI and AGH, filed September 22, 2008, Dodge Point respectfully requests that the Commission deny and dismiss the KMR Petition and KMR’s corresponding applications, File Nos. BNPH-20070119AEI and BNPH-20070119AGH.

Respectfully requested,

DODGE POINT BROADCASTING CO., INC.

By: 
Kevin M. Walsh
Its Attorney

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October 7, 2008

³ *Revision of Procedures Governing Amendments to FM Table of Allotments and Changes of Community of License in the Radio Broadcast Services, Report and Order*, 21 FCC Rcd 14212, 14219 (2006) (the “*Allotment Order*”) (emphasis added).

CERTIFICATE OF SERVICE

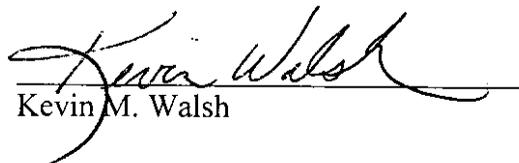
I, Kevin M. Walsh, on this 7th day of October 2008, hereby certify that copies of the foregoing "Reply Comments of Dodge Point Broadcasting Co., Inc." were served by first class U.S. mail, postage prepaid, or hand delivery to the following:

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