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2009 MAR 31 P 2:30

March 30, 2009

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

FILED/ACCEPTED

MAR 30 2009

Federal Communications Commission
Office of the Secretary

**Re: Amendment of Section 73.202(b)
FM Table of Allotments
(Nevada City and Mineral, California)**

Dear Ms. Dortch:

Transmitted herewith on behalf of Shamrock Communications, Inc. is an original and four (4) copies of its Comments in support of the deletion of vacant FM Channel 297A at Nevada City, California and the allotment of the channel at Mineral, California as proposed in the *Notice of Proposed Rule Making*, MB Docket No. 09-9, RM-11511, DA 09-185, released on February 4, 2009.

Should any questions arise concerning this matter, please contact the undersigned.

WILKINSON BARKER KNAUER, LLP

By: 
Patricia M. Chuh

Encls.

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

FILED/ACCEPTED

MAR 30 2009

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Amendment of Section 73.202(b)) MB Docket No. 09-9
Table of Allotments) RM-11511
FM Broadcast Stations)
(Nevada City and Mineral, California))

To: Assistant Chief, Audio Division, Media Bureau

COMMENTS OF
SHAMROCK COMMUNICATIONS, INC.

Shamrock Communications, Inc. ("Shamrock"), by its counsel and pursuant to the *Notice of Proposed Rule Making*, MB Docket No. 09-9, RM-11511, DA 09-185, released on February 4, 2009 ("NPRM") in this proceeding, hereby submits its comments in support of the deletion of vacant FM Channel 297A at Nevada City, California and the allotment of the channel at Mineral, California. The allotment of Channel 297A to Mineral, California will provide Mineral with its first local broadcast service (FM Allotment Priority No. (3) First local transmission service). As noted in the NPRM, Shamrock filed a petition for rule making seeking the proposed channel changes concurrently with an FCC 301 minor change application for new FM station on Channel 297C at Alturas, California (FIN 166018) ("Station"), which seeks a change in the community of license from Alturas, California to Fernley, Nevada as well as a change in the transmitter site, among other things (File No. BMPH-20071108ACY) ("Fernley Community of License Change Application"). The Fernley Community of License Change Application is contingent upon the deletion of Channel 297A from Nevada City, California. In support thereof, the following is submitted:

Shamrock hereby incorporates its November 8, 2007 Petition for Rule Making in support of the deletion of vacant FM Channel 297A at Nevada City, California and the allotment of the channel at Mineral, California. Shamrock also restates its intention to participate in the auction process for new FM station on Channel 297A at Mineral, California if the channel is allotted to Mineral, California.

As requested by the FCC in the NPRM, concurrently with the submission of these comments, Shamrock is filing an FCC 301 application specifying the proposed Channel 297A, Mineral, California facilities ("Mineral Application") and paying the requisite filing fee. Due to a terrain obstruction between the initial reference coordinates specified by Shamrock in its Petition for Rule Making and the principal community of Mineral, as the NPRM noted, the Mineral Application proposes a different site that obviates the terrain obstruction.

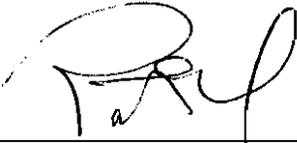
The allotment of Channel 297A to Mineral, California may be made in compliance with the Commission's separation and allocation requirements at reference coordinates 40-15-36 North; 121-32-06 West (NAD 27). Attached is a channel study showing that these allotment coordinates are fully spaced under the Table of Distances in 47 C.F.R. §73.207. Also attached is a map showing that Mineral, California is within the 70 dBu contour of the proposed allotment.

Finally, if Shamrock obtains the construction permit for the new FM station on Channel 297A at Mineral, California, Shamrock will construct the station promptly when authorized.

WHEREFORE, for the reasons above, vacant FM Channel 297A should be deleted from Nevada City, California and allotted to Mineral, California.

Respectfully submitted,

SHAMROCK COMMUNICATIONS, INC.

By: 

Kenneth E. Satten
Patricia M. Chuh
Its Counsel

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March 30, 2009

Kevin Fitzgerald

Job: Mineral Allotment Rev.fmj

Master Database: 2009_Mar_26.fmd

Lat: N40:15:36 Lon: W121:32:06 NAD-27

Channel: 297 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved, Deleted

Channels: Co-Channel, 1st Adj, 2nd Adj, 3rd Adj, IF

Range: 97 km

Comments: No Comments

Description: Prop: 107.3; Mineral, CA; Allotment Spacing Study

Callsign	City	Stat	Latitude (NAD2)	Longitude (NAD2)	Ser Channel	Cla	Stat 73 207	73 207	CiERP	HAA	Adjac	Distan	Beari
STAT:ADD	MINERAL	CA	N40:16:11	W121:31:46	FM 297 : 107.3 MH A	ADD	115	-113.84	0.00	0	Co-C	1.16	024
20060310AEP	ALTURAS	CA	N41:09:22	W120:33:47	FM 297 : 107.3 MH C	CP	226	-96.98	85.00	599	Co-C	129.0	040
NEW	FERNLEY	NV	N39:54:46	W118:55:18	FM 297 : 107.3 MH C	RSV	226	0.21	0.00	0	Co-C	226.2	100
20071108ACY	FERNLEY	NV	N39:54:46	W118:55:18	FM 297 : 107.3 MH C	APP	226	0.21	100.0	600	Co-C	226.2	100
KKLC	FALL RIVER	CA	N40:54:23	W121:49:39	FM 300 : 107.9 MH C1	CP	75	0.92	13.00	633	3rd A	75.92	341
STAT:DEL	NEVADA CIT	CA	N39:18:00	W121:00:00	FM 297 : 107.3 MH A	DEL	115	1.04	0.00	0	Co-C	116.0	157
STAT:VAC	NEVADA CIT	CA	N39:18:00	W121:00:00	FM 297 : 107.3 MH A	VAC	115	1.04	0.00	0	Co-C	116.0	157
KESR	SHASTA LAK	CA	N40:39:06	W122:31:32	FM 296 : 107.1 MH C3	LIC	89	5.61	1.40	415	1st A	94.61	297
KQPT	COLUSA	CA	N39:17:17	W122:20:02	FM 298 : 107.5 MH B	LIC	113	14.80	28.00	193	1st A	127.8	212
KZAP	PARADISE	CA	N39:57:45	W121:42:40	FM 244 : 96.7 MHz B1	LIC	12	24.30	1.50	393	IF	36.30	204
KRQR	ORLAND	CA	N39:53:16	W122:37:38	FM 294 : 106.7 MH B	LIC	69	32.93	50.00	94	3rd A	101.9	246
KKLC	MT. SHASTA	CA	N41:13:37	W122:14:23	FM 300 : 107.9 MH C1	LIC	75	47.76	20.00	249	3rd A	122.7	331
K300AD	CHICO	CA	N39:45:17	W121:44:16	FM 300 : 107.9 MH DX	LIC	0	58.73	0.25	44	3rd A	58.73	197
KRBH-LP	RED BLUFF	CA	N40:10:34	W122:15:00	FM 299 : 107.7 MH L1	LIC	0	61.58	0.00	0	2nd A	61.58	261
KQIP-LP	CHICO	CA	N39:43:46	W121:48:25	FM 296 : 107.1 MH L1	LIC	0	63.34	0.00	0	1st A	63.34	202
STAT:DEL	RIO DELL	CA	N40:30:03	W124:17:10	FM 297 : 107.3 MH C2	DEL	166	69.16	0.00	0	Co-C	235.1	277
KNHT	RIO DELL	CA	N40:30:03	W124:17:10	FM 297 : 107.3 MH C2	LIC	166	69.16	3.30	519	Co-C	235.1	277
KRNO	INCLINE VILL	NV	N39:18:38	W119:53:01	FM 295 : 106.9 MH C	LIC	95	81.43	35.00	911	2nd A	176.4	127
KRBS-LP	OROVILLE	CA	N39:30:51	W121:33:13	FM 296 : 107.1 MH L1	LIC	0	82.84	0.00	0	1st A	82.84	181
KIHP-LP	SHASTA LAK	CA	N40:40:49	W122:22:09	FM 243 : 96.5 MHz L1	LIC	0	84.74	0.00	0	IF	84.74	303
KSTN-FM	STOCKTON	CA	N37:49:17	W121:46:49	FM 297 : 107.3 MH B	LIC	178	93.56	8.10	491	Co-C	271.5	184
K298AF	PROJECT CIT	CA	N40:39:14	W122:31:13	FM 298 : 107.5 MH DX	LIC	0	94.32	0.00	0	1st A	94.32	298

% - To be deleted as part of this Proposal.

Contour Analysis

Kevin Fitzgerald

Job: Mineral Allotment Rev.fmj

Master Database: 2009_Mar_26.fmd

Lat: N40:15:36 Lon: W121:32:06 NAD-27

Scale: 1:200000

Channel: 297 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved, Deleted

Channels:

Range: 97 km, Clearance: FCC

Comments: No Comments

Description: Prop: 107.3; Mineral, CA; 6 kw 16.16 km Uniform 70 dBu Contour

rfInvestigator Version 2.8.1

by rfSoftware, Inc.

Date: 3/27/2009 8:48:02 PM

Key:

City Grade

Protected

Co-Channel

1st Adj

2nd/3rd Adj

