

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

In the Matter of)
)
Amendment of Section 73.215 of the) RM - 11643
Commission's Rules, Related to)
Contour Protection for Short)
Spaced FM Assignments)
)

TO: Marlene Dortch, Secretary
Federal Communications Commission
Attn: Audio Division, Media Bureau

REPLY COMMENTS OF CALVARY CHAPEL OF COSTA MESA, INC.

Pursuant to Section 1.405(b) of the Commission's Rules and Regulations, Calvary Chapel of Costa Mesa, Inc. ("Calvary"), by its attorney, hereby submits the following Reply Comments in the above proceeding. In reply thereto, it is alleged:

1. This proceeding involves a Petition for Rulemaking, filed by SSR Communications, Inc. ("SSR"), requesting sweeping changes in Section 73.215 of the Commission's Rules and Regulations, pertaining to short spaced FM stations. Calvary filed Comments, pointing out that the rule results in a number of anomalies which should be corrected, but taking no position regarding the specific changes requested by SSR.

2. Comments opposing the SSR proposal have now been filed by Clear Channel Communications, Inc., Beasley Broadcast Group, Inc., Bryan Broadcasting Corp.,

Delmarva Broadcasting Company, Merlin Media License, LLC, Radioactive, LLC, the National Association of Broadcasters, and Cohen Dippell and Everist, P.C. The Commenters contend that the changes requested by SSR would be disruptive to the industry and should not be adopted.

3. Earlier in RM-11620, Calvary proposed a narrowly tailored change in Section 73.215 to correct an anomaly whereby it sometimes becomes necessary to assume, falsely, that an antenna is situated below ground. The Commission gave notice of Calvary's proposal in Report No. 2927, dated February 18, 2011. No oppositions to Calvary's proposal were filed, except for one, filed by Owens One Company, Inc. The NAB did not oppose it; Clear Channel did not oppose it; none of the parties who opposed the SSR proposal filed any opposition to Calvary's proposal.

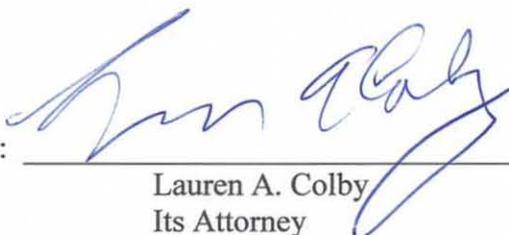
4. It appears, therefore, that there is a consensus of industry support for Calvary's proposal, and we once again urge that it be adopted.

Respectfully submitted,

November 3, 2011

CALVARY CHAPEL OF COSTA MESA, INC.

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By: 
Lauren A. Colby
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CERTIFICATE OF SERVICE

I, Traci Maust, a secretary in the law office of Lauren A. Colby, do hereby certify that copies of the foregoing have been sent via first class, U.S. mail, postage prepaid, this 3rd day of November, 2011, to the offices of the following:

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