

**UNITED STATES OF AMERICA**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**WASHINGTON, DC 20554**

Creation of A Low Power Radio Service )

Docket 99-25

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**REPLY OF DON SCHELLHARDT, ESQUIRE**  
**TO REPLY OF STAR OVER ORLANDO**  
**TO PETITION FOR RECONSIDERATION**  
**BY LET THE CITIES IN!!**

My name is Don Schellhardt, Esquire. I am the attorney for LET THE CITIES IN!! I am also the Co-Founder, and current President of, THE AMHERST ALLIANCE. In this document, however, I am speaking solely for myself, as an individual.

For procedural purposes, I am treating STAR OVER ORLANDO's filing as a Reply to the Petition For Reconsideration of LET THE CITIES IN!! While I do not know yet know enough details to endorse STAR OVER ORLANDO's proposal -- to award "bidding credits to local, "singleton" AM stations seeking FM translators -- I know enough to recommend that the Commission should give this proposal careful consideration.

I ask the FCC to consider as well the establishment of "bidding credits" which improve the competitive posture of small, independent and locally based stations on the *FM* Band.

At the Commission, I may be known best for my advocacy on behalf of Low Power FM (LPFM) radio stations. However, I do not believe the entire concept of "broadcast localism" begins and ends with LPFM alone. So I also advocate vigorous efforts to increase broadcast localism among other groups of radio stations -- including translators and full power stations, both commercial and non-commercial, both FM and AM.

A copy of this document is being sent to Carl Como Tuter, President, STAR OVER ORLANDO, 357 Ocean Shore Boulevard, Ormond Beach, FL 22176.

Reply To STAR OVER ORLANDO

April 1, 2013

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Respectfully submitted,

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