

January 5, 2014

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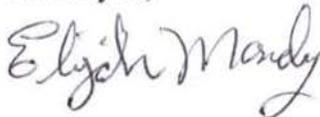
Elijah Mondy, Jr.  
204 Moore Street  
Helena, AR 72342  
870-338-2700

Federal Communications Commission  
Marlene H. Dortch, Secretary  
445 Twelfth Street, SW  
TW-A325  
Washington, D.C. 20554

Re: MB Docket No. 13-282  
RM-11706

Enclosed are the original and four copies of response to reply comments. Please include this document in the consideration.

Thank you,

A handwritten signature in cursive script that reads "Elijah Mondy".

Elijah Mondy, Jr,

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 ) MB Docket No. 13-282  
FM Table of Allotments, ) RM-11706  
FM Broadcast Stations, )  
(Bruce, Mississippi) )  
 )

RESPONSE TO REPLY COMMENTS

To: Marlene H. Dortch, Secretary, Federal Communications Commission, Office of the Secretary  
445 Twelfth Street, SW  
TW-A325  
Washington, D.C. 20554

1. Elijah Mondy, Jr. ("Mondy") hereby responds to Reply Comments of Telesouth Communications, Inc. ("Petitioner") submitted to Federal Communications Commission (FCC) on or about January 28, 2014, received by Mondy on Saturday February 1, 2014.

2. **Background.** The Audio Division has before it a Petition for Rule Making filed by Petitioner, proposing the substitution of Channel 284A for vacant Channel 233A at Bruce, Mississippi. This proposal is part of a contingently filed "hybrid" application for Station WTNM(FM), Water Valley, Mississippi. In its hybrid application, Petitioner proposes that Station WTNM(FM) be modified to operate on FM Channel 234A rather than FM Channel 288A at Water Valley, Mississippi. Correspondingly, Petitioner proposes to amend the FM Table of Allotments by substituting Channel 284A for vacant Channel 233A at Bruce, Mississippi.

3. **Restating Discussion.** The Mondy proposed change in the FM Table of Allotments warrants consideration as it would comply with the technical requirements and would serve the public interest as first local service at New Houlika, Mississippi. An engineering analysis indicates that Channel 284A can be allotted to New Houlika consistent with the minimum distance separation requirements of the Commission's Rules with a site restriction 14 kilometers (8.5 miles) west of the community. The reference coordinates are 34-04-00 NL and 89-10-00 WL.

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4. **Petitioners Comments.** Petitioner reply comments to Mondy's Counterproposal can be summed up as stated in their reply:

(A) "it appears that the Counterproposal must be dismissed as defective".

(B) "Petitioners analysis of the history of the allotment and prior use of the channel at Bruce, Petitioner notes that there is substantial question as to whether there is any existing vacant allotment at Bruce to be modified". Petitioner concludes on this argument by saying "Consequently, it does not appear that there is any vacant allotment at Bruce. As a result, there is no impediment to an immediate grant of the WTNM modification application."

5. **Response to Item (B).** The information provided by Petitioner regarding the allotment at Bruce is very small and does not tell the whole story and one can draw the wrong conclusion. Mondy is owner of Channel 233A (94.5) at Helena, Arkansas. He is short spaced to Bruce, WCMR also 233A (94.5). Because of this, during the 1990's he became friends with the owner at Bruce. Because of the same channel 233 (94.5) they built a relationship and had a sister station environment. The station was in existence with a country format. There was no question about the allocation or allotment. More recently the station was sold to Edgewater and shortly thereafter sold to Horizon. The station for various reason went silent and did file with the FCC regarding this.

In 2010 and 2011 Mondy and an engineer friend made contact with Horizon, the owners of the allocation, in an attempt to acquire Bruce. Mondy spoke with Mr. John Laudadio, Mr. Harry Martin, Horizon President and Kathleen Victory who referred him back to Mr. John Laudadio, the facilitator. In 2012 Mondy and friend tried stronger to acquire this time the "license only" because of problems with the studio, the equipment and tower site. Regarding the land where the tower site was located it was reported to Mondy that there was a bitter domestic dispute and the land owners did not want the tower on their land anymore. Mondy and friend had been studying ways to move to a different location.

The last communication with Horizon was in May of 2012. The license renewal deadline was approaching and there were also concerns about the silent timeline. Furthermore, with license renewal closely approaching Mr. Laudadio indicated they had decided to relinquish the license back to the FCC. We were disappointed but felt that Channel 233 at Bruce would be put up for auction at some future point by the FCC.

Conclusion: There was an allotment, an allocation and a station over the years.

6. **Response to Item (A).** Petitioner has stated Mondy's Counterproposal should be dismissed as defective. This based on an apparent technicality. However, if this is so, the bigger and more important picture and question is whether or not the citizens of New Houlka, Mississippi should be deprived of a "first new service" on a technicality?

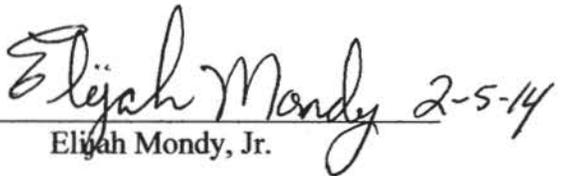
The people of Water Valley already have a service WTNM Channel 288A. The extra people the Petitioner claim is trying to reach already have radio services coming from a number of surrounding stations nearby: Oxford, MS, Tupelo, MS, Byhalia, MS, Sardis, Ms, Houston, MS, Grenada, MS,. It is understandable at times that increasing coverage is practical, but with the above mentioned in view, again the question is should a "first service" be denied for the city of New Houlka. The citizens of New Houlka should have an opportunity to have their own local hometown service just as the citizens of Water Valley did' when WTNM was allotted to Water Valley.

If the frequency is allotted to New Houlka it would be in the public interest.

**Certificate of Service:**

I, Elijah Mondy hereby declare that I have caused the foregoing to be sent, first class US mail, prepaid on February 5, 2014 to the following address:

M. Scott Johnson, Esq.  
Anne Goodwin Crump, Esq.  
Fletcher, Heald & Hildreth, P.L.C.  
1300 N. 17th Street - Eleventh Floor  
Arlington, Virginia 22209

  
Elijah Mondy, Jr.

Respectfully Submitted By:

Elijah Mondy

Date:

FEBRUARY 5, 2014

Elijah Mondy, Jr.  
204 Moore Street  
Helena, AR 72342