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November 15, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Re: MM Docket No. 99-25, RM-9208, RM-9242

Dear Ms. Salas:

On behalf of Americom Las Vegas Limited Partnership and Americom, a California Limited Partnership (collectively, "Americom"), transmitted herewith are an original and four copies of Americom's reply comments in the above-referenced matter.

Please date-stamp the enclosed "Return Copy" of this filing and return it to the courier delivering the package.

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

Respectfully submitted,

Ross G. Greenberg

Ross G. Greenberg

Enclosures

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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	)	
In the Matter of	)	MM Docket No. 99-25
	)	
Creation of a Low	)	RM-9208
Power Radio Service	)	RM-9242

To: The Commission

REPLY COMMENTS OF AMERICOM LAS VEGAS LIMITED PARTNERSHIP AND AMERICOM, A CALIFORNIA LIMITED PARTNERSHIP

Americom Las Vegas Limited Partnership and Americom, a California Limited Partnership (collectively, "Americom"), licensees of several full power radio stations and their associated FM translator stations,[1] by their attorneys, hereby submit their reply comments in connection with the Notice of Proposed Rule Making in the above-captioned proceeding, FCC 99-6, released February 3, 1999. On August 2, 1999, Americom submitted its comments in this matter, in which it opposed the proposition that the Commission afford certain classes of proposed low power FM ("LPFM") radio stations primary status against existing FM translator

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1 Americom Las Vegas Limited Partnership is the licensee of, *inter alia*, Station KLCA(FM), Tahoe City, California, and associated FM translator Station K241AK, Verdi, Nevada; Station KRNO-FM, Reno, Nevada, and associated FM translator Stations K292EP, Incline Village, Nevada, and K257CW, Verdi, Nevada; and Station KWNZ(FM), Carson City, Nevada. Americom, a California Limited Partnership is the licensee of Station KODS(FM), Carnelian Bay, California, and its associated FM translator Stations K267AA, Incline Village, Nevada, K269DB, Stateline, Nevada, and K285EQ, Verdi, Nevada.

stations. Americom stated that such action would endanger established full power FM stations that rely on FM translators to broadcast their signals on a "fill-in" basis to significant areas that are within their predicted 60 dBu, even 70 dBu, contours and urged the Commission to take steps to ensure that existing stations be protected from any new LPFM stations.

Americom notes that comments submitted by the National Association of Broadcasters ("NAB") and the National Translator Association ("NTA") are in accord with Americom's. Americom supports the NAB's position that "[e]xisting translators must be protected in order to ensure that vital service is not interfered with, interrupted or eliminated." Comments of NAB at 62. Americom also concurs with the NTA's belief that "[i]t would neither serve the public interest nor be fair to existing FM translator licensees to have low power FM stations displace FM translators." Comments of NTA at 2. Furthermore, Americom supports NTA's position that LPFM stations should not be permitted to interfere with the operations of FM translators and believes that "[a]n applicant for an LPFM station should therefore be required to protect the input signals of nearby FM translators. Such applicants should also be required to select an output channel that will not affect the inputs of nearby FM translators, or to reach an agreement with the FM translator licensee regarding an engineering solution to the input interference." Id. at 3-4.

At a minimum, FM translators that are essential to provide fill-in service for full power FM stations because of local topography should be protected against interfering LPFM stations, since these FM stations have no choice but to employ translators to deliver their *authorized* signals to their listeners. Fundamental notions of fairness dictate that long-established stations not be displaced or interfered with by new services. Accordingly, the

Commission should not give LPFM radio stations primary status against FM translator stations and should protect FM translators from any new LPFM stations.

CONCLUSION

For the foregoing reasons, the Commission should not afford new LPFM stations primary status against fill-in translator stations that enable their associated full power FM stations to cover their authorized service areas and should seek to ensure that FM translators are protected against interference from incoming LPFM stations.

Respectfully submitted,

AMERICOM LAS VEGAS LIMITED PARTNERSHIP

AMERICOM, A CALIFORNIA LIMITED PARTNERSHIP

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November 15, 1999

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CERTIFICATE OF SERVICE

I, Yaiza E. Garabito, do hereby certify that copies of the foregoing *Reply Comments of Americom Las Vegas Limited Partnership and Americom, a California Limited Partnership*, have been mailed by first-class mail, postage prepaid, this 15th day of November, 1999, to the following:

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