

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

**Satellite Feed For NCE Translators)
On Non-Reserved Frequencies) FCC Docket RM-10609**

REPLY COMMENTS OF WKJCE

WKJCE is an aspiring Low Power FM licensee in the generally under-served area of northwest Pennsylvania. WKJCE also operates WKJCE GLBT INTERNET RADIO on live365.com. This is an Internet broadcasting network, with listeners estimated in the tens of thousands, which provides news and features on gay, lesbian, bisexual and transgender issues.

(1) WKJCE hereby submits Reply Comments *in strong opposition* to the Petition For Rulemaking that was filed by Calvary Chapel and others. In our view, there are *Already* too many satellators in general -- and too many “franchises” of evangelical “chains” in particular. This is particularly true in rural areas such as our own, where the presence of local broadcasting, and local programming, has decreased dramatically since enactment of the Telecommunications “Reform” Act of 1996.

The number of satellators, and other long distance translators, should be *reduced* -- not increased -- on America’s airwaves. Many truly local broadcasters, such as WKJCE, are more than willing to take their place. The ranks of such aspiring local broadcasters range from Low Power FM stations, and potentially Low Power AM stations, to Class A and Class B commercial stations and *independent* public stations, not managed from NPR Headquarters in Washington. The programming they hope

to offer ranges from entertainment to “hard news” -- *and* from secular to religious.

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The Petition For Rulemaking, by Calvary Chapel and others, moves in *exactly* the wrong direction. It is 180 degrees from what the FCC’s policy should be.

(2) In addition to opposing this Petition For Rulemaking, WKJCE also agrees with the contention -- presented in the December 4, 2002 *Written* Comments of REC NETWORKS and also in the January 1, 2003 *Reply* Comments of THE AMHERST ALLIANCE -- that satellators, and other long distance translators, should have a lower Service Status than local broadcasters, including Low Power FM stations and future Low Power AM stations. Satellators, and other long distance translators, should not be able to displace locally based stations -- but locally based stations should be able to displace satellators and other long distance translators.

(3) As for how the FCC should define “distance translators” (the REC NETWORKS term) or “long distance translators” (THE AMHERST ALLIANCE term):

REC NETWORKS has proposed a nationally applicable distance test of 240 miles (400 kilometers) for both satellators and other translators. In an April 15, 2002 Petition For Rulemaking, currently found in the ECFS Document Files for PRM02ET and FCC Docket 95-31, THE AMHERST ALLIANCE, joined by numerous other parties, proposed a lower Service Status for all satellators -- plus a nationally applicable distance test of 60 miles (100 miles) for other translators. In its January 1, 2003 Reply Comments in *this* Docket, THE AMHERST ALLIANCE has continued to include all

satellators in its proposal -- but has revised its treatment of other translators to take

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regional differences into account. With respect to non-satellite translators, Amherst is now proposing: (1) a distance test of 60 miles (100 kilometers) for facilities *East* of the Mississippi River, and also for Hawaii; (2) a distance test of 120 miles (200 kilometers) for Lower 48 facilities *West* of the Mississippi River; and (3) a special distance test of 240 miles (400 kilometers) for facilities in Alaska.

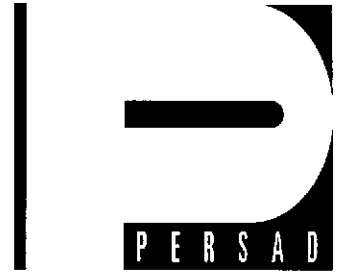
WKJCE can accept and support *any* of these proposals. *Any* of them would be a major improvement over present conditions.

CONCLUSION

For the reasons set forth above, WKJCE urges the FCC to reject the Petition For Rulemaking in this Docket. Also, the FCC should establish a new policy of assigning to satellators, and other long distance translators, a Service Status which is secondary to the Service Status assigned to Low Power FM stations and other locally based broadcasters.

Respectfully submitted,
Joanne Lynn Benjamin
(Formally John R Benjamin)- Garfield25
And
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17 September 2002

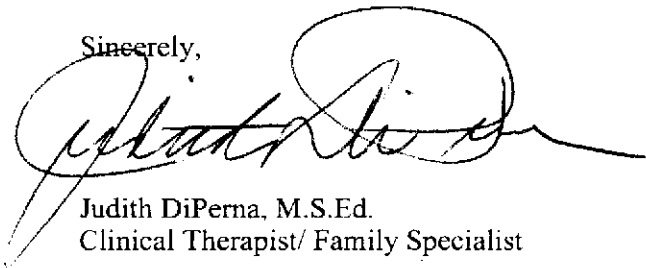
To Whom It May Concern:

This is to verify that the carrier of this letter, Joanne Lynn Benjamin, (formerly known as John R. Benjamin), is currently under treatment and evaluation for gender dysphoria at Persad Center, Inc.

Under the Standards of Care of the Harry Benjamin International Gender Dysphoria Association, the process is quite long-term and involves a series of steps. One major requirement is that the individual requesting live, work and dress in his/her new sex role on a full-time basis for an extended period of time.

Your cooperation and understanding during this process will be much appreciated.

Sincerely,



Judith DiPerna, M.S.Ed.
Clinical Therapist/ Family Specialist

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A copy of the official registration and financial information of Persad Center may be obtained from the PA Department of State by calling toll free, within Pennsylvania, 1-800-732-0999. Registration does not imply endorsement.