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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

Received & Inspected

AUG 19 2019

FCC Mailroom

In Re Application of:)
)
Georgia- Carolina Radiocasting, Inc.) File No. BNPH-20190805AAR
)
For a Construction Permit for)
A New FM Station to Operate on) 238A at Edgefield, SC (New FM
Channel 238A at Edgefield, SC)

To: The Secretary
Attn: Chief, Media Bureau

PETITION TO DENY

RFPJY, LLC, licensee of Station WYPJ, Due West, North Carolina, by its attorney, hereby petitions to deny the above-referenced hybrid application filed by Georgia-Carolina Broadcasting, Inc. ("GBCI") to allot Channel 238A at Edgefield, South Carolina and for a construction permit for a new FM station to operate on the proposed new channel allotment.

RFPJY has standing to file this Petition because the grant of GBCI's application will preclude grant of its application to modify the facilities of Station WYPJ (BPH-20190806AAT) which was filed on day after GBCI's application.

The basis for this Petition to Deny which is set out in the attached Engineering Statement of George S. Crissey is that GBCI's application did not include a map showing the class maximum uniform terrain city grade coverage from the allocation reference site. Such a showing is fundamental to consideration and analysis of the rulemaking aspect of GBCI's application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Tillotson", with a stylized flourish at the end.

David Tillotson
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Washington, DC 20007
Tel: 202 625-6241
Email: dtlaw67@starpower.net
Attorney for RFPJY, LLC

August 12, 2019

**Petition to Deny
Proposed New FM Allotment
BNPH-20190805AAR
Edgefield, South Carolina**

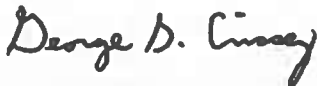
Engineering Statement

Bromo Communications, Inc. is representing RFPJY, LLC, licensee of WYPJ (FM) Due West, SC in this Petition to Deny the application for a new allotment on Channel 238A at Edgefield, SC (File No. BNPH-20190805AAR) filed by Georgia-Carolina Radiocasting, Inc. ("GCRI").

It is believed that this hybrid rulemaking application is deficient and must be denied. In its application, GCRI failed to include a map demonstrating the class maximum uniform terrain city grade coverage from the allocation reference site. This city grade showing is a fundamental requirement of all FM rulemakings.

Therefore, since GCRI did not include this crucial community coverage map in its application, RFPJY, LLC believes Application BNPH-20190805AAR should be denied.

All statements contained herein are thought to be accurate and correct to the knowledge of the undersigned.



George S. Crissey
Bromo Communications, Inc.
Technical Consultant to RFPJY, LLC

August 9, 2019

I, David Tillotson, hereby certify that a copy of the foregoing PETITION TO DENY has been sent via first class United States mail, postage pre-paid, and by electronic mail this 12th day of August, 2019, to:

DOUGLAS M. SUTTON, JR.
GEORGIA-CAROLINA BROADCASTING COMPANY, LLC
P.P. DRAWER E
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Email: SUTTON@GACARADIO.COM



David Tillotson