

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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| In the Matter of |) | |
| |) | |
| WGKS(FM) |) | FCC File No. 0000136127 |
| Application to Change Community of License |) | FCC Facility ID No. 36140 |
| From Paris, KY to Stamping Ground, KY |) | |

To: Chief, Audio Division

COMMENTS OF L.M. COMMUNICATIONS, INC.

L.M. Communications, Inc. submits these comments in support of the above-referenced application (the “WGKS Application”) to change the community of license of station WGKS(FM), FCC Facility ID No. 36140, from Paris, Kentucky to Stamping Ground, Kentucky.

The WGKS Application was filed simultaneously with an application filed by Clarity Communications, Inc. to, among other things, change the community of license of its station WLXO(FM),¹ Stamping Ground, to Paris (the “WLXO Application”). The WLXO Application proposes technical modifications that will result in service to an additional 10,950 people (based on 2010 census data) within the WLXO 60 dBu service contour, and 170.7 sq km in area. The WGKS Application proposes no technical modifications and therefore no change in population or area served by WGKS.

Both of the subject communities – Paris and Stamping Ground – will retain their current number of local transmission services. With the change in community of license of WGKS, Stamping Ground will maintain its sole local service. With the relocation of WLXO, Paris will continue to be served by three local transmission services.

¹ Since the filing, WLXO’s call sign has changed to WWRW. For the sake of clarity, the station is referred to herein as WLXO.

Providing broader service to the public, while maintaining local service at Paris and Stamping Ground, is clearly in the public interest. It is also a preferential arrangement under Priority 4 of the FCC's long-established FM Allotment Priorities.²

Finally, there is no question that Stamping Ground is a community for Section 307(b) purposes. As noted in the WGKS Application, Stamping Ground is an incorporated city that has its own city government and various administrative departments. It is also the current community of license of one full power broadcast station.

Respectfully submitted,

L.M. COMMUNICATIONS, INC.

By: /s/ Lynn M. Martin
Lynn M. Martin, President

June 22, 2021

² The FM Allotment Priorities are (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters. Co-equal weight is given to priorities (2) and (3).