

Before the **POSTED**
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In re Application of)
)
SCOTTSDALE ITALIAN SOCIAL CLUB) File No. BSTA-20100923AHO
)
For Authority to Station KWSS-LP Under) Facility ID No. 134485
Special Temporary Authority)

To: Secretary, Federal Communications Commission
Attn: The Chief, Audio Division, Media Bureau

FILED/ACCEPTED

SEP 28 2010

Federal Communications Commission
Office of the Secretary

COMMENTS

Entravision Holdings, LLC ("Entravision"), the licensee of FM Radio Station KVVA-FM, Apache Junction, Arizona, by its attorneys, hereby files these Comments in response to the above-referenced request ("STA Request") filed by the Scottsdale Italian Social Club ("SISC"), the licensee of Low-Power FM Radio Station KWSS-LP, Scottsdale, Arizona ("Station"), in which SISC seeks Special Temporary Authority to operate on FM Output Channel 230, in place of FM Output Channel 294, and to relocate its transmitter site. In support thereof, Entravision states as follows.

According to the STA Request, SISC is seeking the changes in its operating authority owing to an application submitted by William S. Konopnicki ("Konopnicki"), the licensee of FM Station KNKI(FM), Pinetop, Arizona, to modify KNKI's facilities as set out in FCC File No. BPH-20100609AGX,¹ and Entravision's application to modify the KVVA-FM facilities as set out in FCC File No. BPH-20100817ABA ("KVVA Application"). The KNKI application was

¹ Konopnicki unilaterally requested the dismissal of the KNKI application and the Commission took that action on September 22, 2010. *Public Notice*, Report No. 47329, released September 27, 2010.

the first to be submitted and proposed a change in community of license, from Pinetop to Tonto Basin, Arizona. It also proposed that the Commission issue an Order to Show Cause that would have resulted in Entravision's Station KDVA(FM), Buckeye, Arizona, having to change its output channel from FM Channel 295A to FM Channel 294A.

After reviewing the KNKI application, Entravision determined that the proposal would not result in the best use of the broadcast spectrum, including the spectrum utilized by Entravision. Consequently, Entravision filed the KVVA Application, whereby KVVA would change its community of license from Apache Junction, Arizona to Sun Lakes, Arizona and modify its transmitter site and an application involving KDVA, in FCC File No. BPH-20100817AAX, requesting to modify its output channel from FM Channel 295A to FM Channel 294A.

Entravision neither supports nor opposes the request submitted by SISC. Rather, having been apprised of the statements concerning Entravision contained in the STA Request, Entravision is submitting these Comments in order to clarify the record and to confirm that Entravision has not had the dealings with SISC that SISC alleges in the STA Request nor taken actions that in any manner serve to violate SISC's rights.

Initially, Entravision wishes to make clear that neither it nor any officer or employee of Entravision has not communicated with SISC, in the past eight months, in regard to KWSS-LP or any radio station modifications that might impact on KWSS-LP's operations. Contrary to SISC's allegation, Entravision has never "assigned an attorney to represent us [sic] KWSS-LP." Neither Entravision's in-house legal staff nor its outside communications counsel have ever spoken with SISC. Who the alleged but unnamed attorney is and who his principal might be is a matter that Entravision is not aware of. Based on its own review, Entravision has concluded that neither it nor its attorneys have had any dealings with SISC in the preceding eight month period.

Entravision also wishes to note for the record that, as indicated above, Entravision was not the party that commenced a proceeding that would affect KWSS-LP. The party that submitted the initial application and implicated KWSS-LP's operations was Konopnicki. Contrary to another allegation on SISC's part, Entravision has never been "working in concert" with Konopnicki and has no business or personal relationship with him whatsoever. Whatever actions Konopnicki has taken, they have been of his own volition and Entravision has responded to those actions.

Once Konopnicki commenced a proceeding involving an order to show cause that would have impacted on a station owned by Entravision, Entravision reviewed the request that had been made. It determined that if there was to be a modification of KDVA, that there was a set of changes, involving both KDVA and KVVA-FM, that would result in a preferred set of allotments with better service to the listening public.

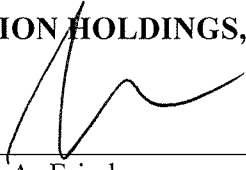
Entravision is proceeding with the prosecution of its applications based on the improvement in broadcast service they will provide. However, there are several hurdles that Entravision must overcome before it is granted the construction permits being sought. At this point in time, it is not certain as to when, or if, the Commission will grant the requests contained in the applications Entravision has filed. Should they be granted in the manner requested, Entravision will then be prepared to discuss with SISC the impact of such grants on KWSS-LP and what assistance SISC would wish to secure from Entravision. Until then, Entravision desires that the Commission be aware that Entravision has neither communicated with SISC nor taken any of the actions alleged by SISC in its STA Request. On the contrary, Entravision's actions were ones taken in response to a submission by a third party and in order to ensure that

Entravision provided broadcast service on KDVA and KVVA-FM that was in the public interest.

Respectfully submitted,

ENTRAVISION HOLDINGS, LLC

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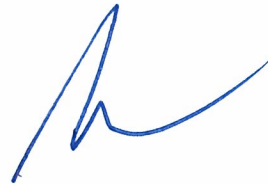
Dated: September 28, 2010

CERTIFICATE OF SERVICE

I, Barry A. Friedman, hereby certify that I have served on this 28th day of September, 2010, a copy of the foregoing **COMMENTS** on the following parties by first-class mail, postage pre-paid:

Scottsdale Italian Social Club
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Scottsdale, Arizona 85259

Mr. Charles N. Miller*
Audio Division
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445 12th Street, S.W.
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Barry A. Friedman

*By Hand and E-Mail