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**ORIGINAL**

Before The  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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**MAR 13 2002**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In Re Application Of )  
 )  
VENTURE TECHNOLOGIES GROUP, LLC )  
Los Angeles, California )  
 )  
For A New Low-Power Television Station )  
On Channel 33 in Banning, California )

File No. BNPTTL-20000831AVX

To: The Chief  
Mass Media Bureau

**REPLY**

Costa de Oro Television, Inc. ("Costa"), the licensee of Station KSMV-LP, Los Angeles, California, by its attorneys and pursuant to Section 73.3584(c) of the Commission's Rules, hereby files this Reply to the Opposition of Venture Technologies Group, LLC ("Venture") to Costa's Petition to Deny the above-referenced application for a new low-power television station on Channel 33 in Banning, California. Costa has submitted simultaneously herewith a Petition for Leave to File Pleading to permit the consideration of this pleading. In support thereof, Costa states as follows.

On February 19, 2002, Costa submitted a Petition to Deny Venture's application. In an Opposition to Costa's Petition filed on March 1, 2002, Venture argues that Costa's Petition was prematurely filed. Whether or not that pleading can be considered a petition to deny, the arguments contained therein demonstrating that the proposed Banning operation will cause impermissible interference to KSMV-LP remain perfectly meritorious. If the Commission determines that Costa's Petition does not qualify as a petition to deny, it should treat the Petition

as an informal objection and give it appropriate consideration. *See* Section 1.41 of the Commission's Rules.

WHEREFORE, Costa respectfully requests that this Reply be accepted for filing and that the application of Venture Technologies Group, LLC for a new station on Channel 33, Banning, California be denied.

Respectfully submitted,

**COSTA DE ORO TELEVISION, INC.**

By:  \_\_\_\_\_

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March 13, 2002

CERTIFICATE OF SERVICE

I, Barry A. Friedman, do hereby certify that I have, on this 13th day of March, 2002,  
served a copy of the foregoing "Reply" upon the following parties, by first-class mail, postage  
prepaid:

Mr. Gregory L. Masters, Esq.  
Wiley, Rein & Fielding  
1176 K Street N.W.  
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Mr. Hossein Hashemzadeh\*  
Supervisory Engineer  
Low Power Television Branch  
Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
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Barry A. Friedman

\*By Hand