

BEFORE THE
Federal Communications Commission
WASHINGTON, D. C. 20554

In re Applications of) MB Docket No. 17-85
)
Entercom Communications and CBS)
Radio Seek Approval to Transfer)
Control of and Assign FCC)
Authorizations and Licenses)

TO: Office of the Secretary

ATTN: Chief, Media Bureau

**MOTION FOR LEAVE TO FILE
THIRD SUPPLEMENT TO PETITION TO DISMISS OR DENY**

Edward R. Stolz II d/b/a Royce International Broadcasting Company (Stolz), Golden State Broadcasting, LLC (Golden), Silver State Broadcasting, LLC (Silver) and Major Market Radio, LLC (Major) (collectively "Petitioners"), by their attorney, hereby respectfully submits this Motion for Leave to File a Third Supplement to their May 1, 2017 "Petition to Dismiss or Deny". In support whereof, the following is shown:

1. In the FCC's Public Notice of March 31, 2017 setting the procedural dates for this proceeding, DA 17-299, the Commission wrote that: "Submissions after the pleading cycle has closed that seek to raise new issues based on new facts or newly discovered facts should be filed within 15 days after such facts are discovered" (DA 17-299 at 3). In this instance, the fifteenth day

is today, October 17, 2017, and thus is within the time frame for pleadings based on newly discovered facts established in DA 17-299. 47 C.F.R. §1.4(j).

2. This supplement involves three incidents over the past 15 days which bring into question the basic character qualifications of CBS Corporation to serve as a public trustee, including (1) the misanthropic statement of former CBS executive and legal counsel Hayley Geftman-Gold having no sympathy for the victims of the Route 91 Harvest Music Festival in Las Vegas whom she presumed to be "republican gun toters", (2) President Trump's call for proceedings against CBS Corporation's broadcast licenses, and (3) the apparent cover-up by CBS News, among the other legacy network news operations, of the predatory sexual conduct of Hollywood entertainment mogul and democrat party activist Harvey Weinstein, over many years.

3. Our Third Supplement makes the legal arguments why the Commission must complete an investigation of the CBS News operation for possible "intentional news distortion" before it can or cannot make the 47 U.S.C. §309(d) statutory finding that CBS Corporation and its principals possess the basic qualifications to be Commission licensees and that a grant of the above-captioned applications would serve the public interest, convenience and necessity.

WHEREFORE, it is urged that this Motion for Leave to File a Third Supplement **BE GRANTED** and that the accompanying "Third Supplement to Petition to Dismiss or Deny" **BE CONSIDERED**.

Respectfully submitted,

EDWARD R. STOLZ II, d/b/a ROYCE
INTERNATIONAL BROADCASTING COMPANY
GOLDEN STATE BROADCASTING, LLC
SILVER STATE BROADCASTING, LLC
MAJOR MARKET RADIO, LLC



By _____
Dennis J. Kelly
Their Attorney

LAW OFFICE OF DENNIS J. KELLY
Post Office Box 41177
Washington, DC 20018
Telephone: 202-293-2300
E-mail: dkellyfcclaw1@comcast.net

DATED: October 17, 2017

CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing "Motion for Leave to File, etc." have been served by e-mail and first-class United States mail, postage prepaid, or by e-mail only where shown by "**", on this 17th day of October, 2017 upon the following:

Meredith S. Senter, Jr., Esquire

Laura M. Berman, Esquire

Lerman Senter PLLC

2001 L Street, NW, Suite 400

Washington, DC 20036

msenter@lermansenter.com

LBerman@lermansenter.com

Counsel for CBS Broadcasting, Inc. and subsidiaries

David H. Solomon, Esquire

J. Wade Lindsay, Esquire

Wilkinson Barker Knauer, LLP

1800 M Street, NW, Suite 800N

Washington, DC 20036

DSolomon@wbklaw.com

WLindsay@wbklaw.com

Counsel for Entercom Communications Corp.

Carrie A. Ward, Esq.

Entercom Communications Corp.

Entercom License, LLC

401 E. City Avenue, Suite 809

Bala Cynwyd, PA 19004-1900

cward@entercom.com

Nancy A. Ory, Esq.

Lerman Senter PLLC

2001 L Street, NW, Suite 400

Washington, DC 20036

nory@lermansenter.com

Counsel for Entercom Divestiture Trust

Michael Wagner, Esq.*

Audio Division, Media Bureau

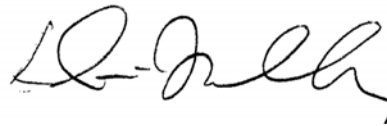
Room 2-A523

Federal Communications Commission

Washington, DC 20554

Michael.Wagner@fcc.gov

Stephen Svab, Esq.*
Audio Division, Media Bureau
Room 2-A802
Federal Communications Commission
Washington, DC 20554
Stephen.Svab@fcc.gov

A handwritten signature in black ink, appearing to read "D. Kelly", written in a cursive style.

Dennis J. Kelly