



February 21, 2018

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Via Electronic Filing

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: Notice of *Ex Parte* Communication with Brooke Ericson,
Chief of Staff and Legal Advisor, Media
to Commissioner Michael O’Rielly
RM-11727; RM-11643**

Dear Ms. Dortch:

The following telephone conference summary is submitted pursuant to 47 C.F.R. Section 1.1206(b)(1).

On February 21, 2018, Jeff Littlejohn, Executive Vice President - Engineering & Systems Integration, iHeartCommunications, Inc. (together with iHeartMedia + Entertainment, Inc., “iHeart”), spoke by telephone to Brooke Ericson, Chief of Staff and Legal Advisor, Media, to Commissioner Michael O’Rielly. Also on the phone call were Jessica Marventano, Senior Vice President, Government Affairs, iHeart; Dan Dukes, Senior Director, Government Affairs, iHeart; Sara Morris, Senior Director, Government Affairs; and the undersigned.

Mr. Littlejohn outlined the real-life impediments in the event a “show cause/trigger” system was adopted for a potential new Class (C4) of FM stations: if an existing FM station operating with less than class maximum facilities could be triggered and forced to construct or relocate to a higher tower structure, and if such higher tower was not feasible, which could be due to regulatory, local land use and/or economic reasons, the result would be the involuntary reduction of interference protection to that afforded under Section 73.215, thereby

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blocking such a station from subsequent facility improvements and flexibility in case of forced relocation, and impeding reception by established listeners.¹

Respectfully submitted,

REPP LAW FIRM

By: 
Marissa G. Repp

Counsel to iHeartCommunications, Inc.

cc: Brooke Ericson (via e-mail)

¹ iHeart participated previously in a Joint Statement with other broadcasters noting the detriments to the public and the FM band of the SSR Communications, Inc. proposal to limit interference protection for all FM stations to the contour protections of Section 73.215, rather than protection to the maximum class facilities. *See* RM-11643, Joint Statement of Beasley Broadcast Group, Inc., Bryan Broadcasting Corporation, Clear Channel Communications, Inc., Delmarva Broadcasting Company, Merlin Media License, LLC, and Radioactive, LLC (October 28, 2011).