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Andrew P. Sutor, IV
Executive Vice President / General Counsel

October 25, 2018

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notice of Ex Parte Communication
MB Docket No. 13-249**

Dear Ms. Dortch:

On October 23, 2018, Laura Berman and I met with Albert Shuldiner, James Bradshaw, Tom Hutton, Lisa Scanlan, Michael Wagner, and Annette Smith of the Audio Division. During that meeting, we discussed certain issues related to the Commission's Second Further Notice of Proposed Rulemaking in the above-captioned docket. Specifically, we discussed concerns that the proposed changes to reduce signal protection for Class A AM stations would result in a significant loss of established listenership. These listeners rely on these Class A AM stations for a variety of information, including with respect to public safety. Accordingly, the proposed changes could have a detrimental impact if these listeners lose over the air access to these stations.

In addition, many of these Class A AM stations are "Primary Entry Point" stations that work cooperatively with the Federal Emergency Management Agency to serve as the critically important initial point for triggering the nation's Emergency Alert System. Limiting interference protection for these stations could have a significant public safety impact.

Respectfully submitted,

/s/ Andrew P. Sutor, IV

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cc: Albert Shuldiner
James Bradshaw
Tom Hutton
Lisa Scanlan
Michael Wagner
Annette Smith