



**REC Networks**

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March 6, 2018

Via ECFS

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

In the matter of:

**RM-11727** : Amendment of 73.207, 73.210, 73.211, 73.215, 73.3573 of the Commission's Rules to establish minimum distance separation between stations, requirements, contour protection for short-spaced FM assignments and processing FM broadcast station applications.

**RM-11749** : Establishment of new 250-watt LPFM service class and other amendments to Part 73 and 74 to support the LPFM service.

**MB Docket 17-105** : Modernization of Media Regulation Initiative.

**NOTICE OF EX PARTE**

Dear Ms. Dortch:

On March 6, 2018, I (Michelle Bradley of REC Networks) met in person with James Bradshaw, Deputy Chief, Media Bureau, Audio Division; Rodolfo F. Bonacci, Assistant Chief, Media Bureau, Audio Division and Christine Goepp, Esq., Attorney Advisor, Media Bureau regards to the above captioned proceedings.

Subjects included a group discussion of the proposed Class C4 service class with a group of station owners (who should be filing their own notice of ex parte) including the author of the Petition for Rulemaking, Matthew Wesolowski.

I expressed concern within REC's LPFM constituency regarding the potential increased interference that some LPFM stations may experience with upgraded Class C4 stations, educated on certain unimplemented aspects of the Local Community Radio Act (LCRA) and how those aspects could be used to create Audio Division policy for handling waiver requests from LPFM stations for changes to channels that are "short-spaced" due to an FM translator, another LPFM station or TV Channel 6 station in a manner that is in accordance with the LCRA.

I provided statistics of Class A FM stations that could potentially upgrade to Class C4 and the number of potentially impacted LPFM stations in specific categories.

I proposed distance separations in §73.807(a) for LPFM to Class C4 in respect to LP-100 and the LP-250 service proposed in RM-11749. Protections to C4 are proposed to be at the same co-channel and first-adjacent channel spacings as Class A. This can be done in accordance with the LCRA.

I raised the concern that any “special” protections given to translators or preferential treatment given to one type of translator would violate Section 5(3) of the LCRA.

I inquired on the status of the LP-250 proposal, RM-11749.

I provided Mr. Doyle with a written presentation of the LPFM technical proposals forwarded by REC in RM-11749 and MB Docket 17-105.

Please contact me if you have any questions regarding these matters.

Respectfully submitted,

/S/

Michelle Bradley  
Founder  
REC Networks