



May 23, 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 Audio Division, Media Bureau
RM-11727; RM-11643; MB Docket No. 18-119**

Dear Ms. Dortch:

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

On May 22, 2018, representatives of iHeartCommunications, Inc., as debtor in possession (“iHeart”) met with staff of the Media Bureau and its Audio Division concerning matters in the above-referenced proceedings. Attending the meeting from iHeart were: Jeff Littlejohn, Executive Vice President-Engineering & Systems Integration; Jessica Marventano, Senior Vice President, Government Affairs; Sara Morris, Senior Director, Government Affairs; Dan Dukes, Senior Director, Government Affairs; and the undersigned counsel. Attending from the Audio Division/Media Bureau were Albert Shuldiner, Chief; James Bradshaw, Senior Deputy Division Chief; Lisa Scanlan, Deputy Division Chief; and Christine Goepp, Attorney Advisor, Media Bureau.

The principal purpose of the meeting was to express iHeart’s views on the proposed creation of a new FM Class C4 and related proposals therein. As discussed by Mr. Littlejohn, iHeart does not oppose the basic establishment of a Class C4.

Mr. Littlejohn stated, however, that iHeart does have serious concerns regarding a related proposal to establish a triggering system whereby an under-maximum station would be reduced to the more limited contour protections of Section 73.215, thereby changing the allocation scheme for the non-reserved FM band. If such a station is triggered, cannot maximize facilities, and is thus forced to Section 73.215 contour protection, it would limit that station’s ability to relocate its transmitter site. Relocation flexibility is a particular concern given the pressures on tower locations due to a fluid TV repack environment. Mr. Littlejohn noted that iHeart evaluated

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the impact on existing iHeart radio transmitter sites of planned TV repack transmitter site uses one year ago and again now, finding a 30 percent change in the impact on iHeart's radio sites, with some radio transmitter locations thought to be unaffected a year ago now likely subject to relocation pressure. This leaves unsettled whether any given radio station will need the flexibility afforded by Section 73.207 spacing protection due to a forced relocation during the TV repack, in addition to the ongoing risk of losing a radio tower site due to other market forces.

Mr. Littlejohn also noted that there are many established radio listeners at the edges of a station's predicted contour that would be harmed by forced Section 73.215 reclassification. He explained that iHeart is studying, in connection with FM translator interference protections, the reported listeners of approximately 900 radio stations (not limited to iHeart stations) outside of stations' protected contours, finding significant established listening. This potential loss of audience is also a major concern for public broadcasters.

Given the need for additional data on this matter, particularly the restricting downsides of a trigger system for under class maximum radio stations subject to location pressures, at best, Mr. Littlejohn suggested a notice of inquiry would be a more appropriate first step for the Commission to take at this time.

Respectfully submitted,

REPP LAW FIRM

By: 
Marissa G. Repp

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As Debtor in Possession

cc (via email): Albert Shuldiner
James Bradshaw
Lisa Scanlan
Christine Goepp