

JUN 01 2018

**WTRS / 750-AM**FCC Mailroom  
**We're Tompkins' Radio Station**

Romar Communications Inc.  
175 Gray Road  
Ithaca, NY 14850

May 29, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

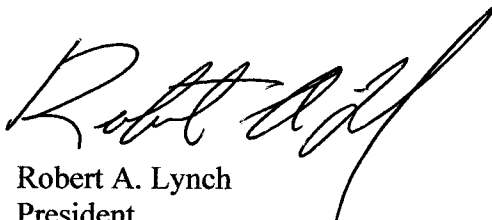
Dear Ms. Dortch:

Romar Communications Inc. hereby submits for Commission consideration the attached Petition for Rulemaking seeking amendment of Section 73.3598 of the Commission's Rules as it impacts the period of construction for certain AM broadcast stations.

In accordance with §1.419(b), the original and six (6) copies are included, thereby providing a sufficient number of copies for distribution to each Commissioner. A further seventh copy is enclosed, which we request be forwarded to Ms. Michelle M. Carey, Chief of the Media Bureau.

We trust the Commission will give our petition thoughtful consideration.

Respectfully submitted,



Robert A. Lynch  
President  
Romar Communications Inc.

encl.

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MB 18-1  
Audio

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of )

)  
Amendment of §73.3598 of the )  
Rules; Period of Construction for )  
AM Broadcast Stations )  
)

MB Docket No: \_\_\_\_\_

**PETITION for RULEMAKING**  
by  
ROMAR COMMUNICATIONS INC.

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EXECUTIVE SUMMARY

Romar Communications Inc. (Romar), of 175 Gray Road, Ithaca, New York, by its President, Robert A. Lynch, of the same address, hereby submits this PETITION FOR RULEMAKING to the Commission. Romar seeks amendment of §73.3598 of the Rules as it affects the period of construction for certain broadcast stations in the AM Radio service. The amendment Romar proposes would authorize staff within the Media Bureau to grant, upon application, a one-time discretionary extension of completion for New or Major Change construction permits affecting a limited number of AM Broadcast permittees, those who have secured for the first time during the AM station's period of construction, companion construction permits for New Cross-Service FM Broadcast Translators to rebroadcast the signal of the new or modified AM stations. Depending

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upon the timing of the translator authorization's award relative to the underlying AM construction permit, such discretionary extensions of construction may extend eighteen (18) to twenty-four (24) months. Additionally, certain AM permittees would also be eligible for tolling of the AM station's period of construction when those permittees' cross-service FM translator applications remained pending at the AM permits' expiration. Romar Communications Inc. is the holder of an FCC construction permit for a New AM station, WTRS, to serve Lansing, New York. Romar is also the pending applicant for a new cross-service FM translator which would rebroadcast WTRS within its market. Therefore, Romar holds standing to advance this petition.

Romar believes its proposed amendment of the Rules would serve the public interest. The amendment Romar proposes would enable start-up AM permittees to better survive and succeed in the competitive, increasingly-consolidated modern broadcast marketplace. Romar maintains such competitive viability would serve the public by expanding the number of diverse voices and viewpoints in the markets where AM start-ups seek to gain a competitive toehold. Romar believes a cross-service FM translator is an essential technical asset for the modern AM station. However, as Romar explains, some new AM operators may be caught in the regulatory crossfire; compelled to construct and license their new or major-modified AM stations before the essential complement of a cross-service FM translator can be assured, or where such assurance comes too late in the AM construction cycle so as to enable adequate time to construct the AM facility.

Romar would make award of limited-time extensions of an AM construction permit's expiration contingent on a permittee's public interest showing of otherwise good-faith efforts to implement its authorization. Successive construction permit extensions would not be permitted.

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Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of §73.3598 of the ) MB Docket No: \_\_\_\_\_  
Rules; Period of Construction for )  
AM Broadcast Stations )  
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**PETITION for RULEMAKING**  
by  
ROMAR COMMUNICATIONS INC.

To: The Commission:

**I. Introduction**

1. Romar Communications Inc. (Romar), of 175 Gray Road, Ithaca, New York, by its President, Robert A. Lynch, hereby submits this PETITION FOR RULEMAKING (Petition) to the Commission. In this Petition, Romar seeks amendment of §73.3598 of the Rules as it affects the period of construction for certain broadcast stations in the AM Radio service. The text and purpose of Romar's Petition would authorize staff within the Media Bureau to grant, upon application, a one-time discretionary extension of completion for New or Major Change construction permits affecting a limited number of AM Broadcast permittees. Eligible permittees would be those who have secured for the first time during the AM station's period of construction, companion construction permits for New Cross-Service FM Broadcast Translators (Cross-Service Translators), translators designated to rebroadcast the signal of the new or modified AM station. Additionally, those AM permittees whose cross-service FM translator applications remained pending at the close of the AM permit's construction period would be eligible for tolling of the AM station's period of construction. Romar believes its proposed amendment of the Rules would serve the public interest.

2. As proposed, Romar's Petition would revise Section 73.3598 as follows:

**§73.3598 Period of construction.**

(a) Except as provided in the last two sentences of this paragraph or as modified by paragraph (e) herein, each original construction permit for the construction of a new TV, AM, FM or International Broadcast; low power TV; TV translator; TV booster; FM translator; or FM booster station, or to make changes in such existing stations, shall specify a period of three years from the date of issuance of the original construction permit within which construction shall be completed and application for license filed....

\* \* \* \* \*

(e) Notwithstanding other paragraphs of this section, the permittee for a New AM station or Major Change AM station shall be eligible to request from the Commission, upon a timely-filed application, a one-time limited extension of the referenced construction permit's completion date, providing that since the date of the AM station construction permit's issuance and prior to that permit's expiration

(1) The requesting permittee has received authorization for its first-ever cross-service FM translator, said translator designated to rebroadcast the subject station of the AM permit. Grant of said extension of construction permit would be at the discretion of the Commission's staff and upon a showing that said extension would serve the public interest. Such a one-time discretionary extension would extend the AM permit's period of construction for the longer of eighteen months from the AM permit's expiration date, or twenty-four months from the stated expiration date of the construction permit for the cross-service FM translator. Successive extensions shall not be authorized.

(2) The requested permittee has filed with the Commission an application seeking authorization for its first-ever cross-service FM translator, said translator designated to rebroadcast the subject station of the AM permit, and that said cross-service FM translator application remains pending before the Commission as the subject of either administrative or judicial review on the expiration date of the AM permit. Under such circumstances, the underlying AM construction permit would be eligible for tolling under the provisions of paragraph (b)(2) of this section. Upon the subsequent grant of the cross-service FM translator's application, the AM construction permit would then be eligible for an extension under the provisions of paragraph (e)(1) of this section.

[Renumbered] (f) Any construction permit for which construction has not been completed, including under any valid extension requested and/or granted in accordance with paragraph (e) herein, and for which an application for license has not been filed, shall be automatically forfeited upon expiration without any further affirmative cancellation by the Commission.

\* \* \* \* \*

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<sup>1</sup> As is standard legal practice, the text underlined in these paragraphs is that to be added to the existing section of the Rules.

## II. Petitioner's Standing

3. Romar Communications Inc. is the current holder of FCC Construction Permit File No. BNP-20020522AAM; Facility ID No. 136961, which authorizes Romar to construct a New, full-time AM Broadcast Station, call letters, WTRS, to serve Lansing, New York. Romar's referenced permit was granted on April 29, 2016 and is due to expire 36-months after that date, namely on April 29, 2019. Romar has yet to construct the WTRS CP or apply for its license.

4. On May 8, 2018, Romar filed construction permit application File No. BNPFT-20180508AAR, Facility ID No. 202865, whereby Romar seeks authorization for a New commercial FM translator, said translator to be licensed to serve Ithaca, New York and designated as a cross-service FM translator to be used exclusively to rebroadcast the AM signal and programming of WTRS, Lansing, NY.<sup>2</sup> Romar would anticipate that should the cross-service translator be authorized, that translator would be activated simultaneously with the commencement of program test authorization for the WTRS AM CP.

5. Given the circumstances affecting its AM CP's period of construction, Romar would expect to avail itself of any amendment to §73.3598 of the Rules so as to extend the construction completion date for WTRS under BNP-20020522AAM. Romar Communications Inc. holds a cognizable interest in this proceeding. To the point, absent the Petition's grant, Romar may find itself unable to construct its new AM station within the term of its existing authorization. Romar runs the risk of sustaining "concrete and particularized" injury which is "imminent" should the instant Petition *not* be granted.<sup>3</sup> Said injury would be directly traceable

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<sup>2</sup> See also short-form construction permit application BNPFT-20180126ADG, filed January 26, 2018.

<sup>3</sup> See *Lujan v. Defenders of Wildlife*, 504 U.S. 555 (1992); also *Allen v. Wright*, 468 U.S. 737 (1984).

to the Rule at issue. But such traceable injury is redressable should §73.3598 be amended as Romar proposes.<sup>4</sup> Without question, Romar has standing to advance this Petition.

### III. Background

6. The Commission and its leadership have long recognized the distinct and valuable service AM radio has provided in advancing the public interest. But they also recognize the technical and marketing impediments AM radio faces in the 21<sup>st</sup> Century media environment. In its First Report and Order in MB Docket No. 13-249, the *Revitalization of the AM Radio Service*, the Commission stated, “AM radio has traditionally served as a vital source of news and information, as well as a critical lifeline in times of emergencies and man-made or natural disasters.”<sup>5</sup> First as a Commission member, and then as agency Chairman, Ajit Pai has echoed that sentiment. Stated the Chairman, “I’ve said many times before that when it comes to promoting localism, advancing diversity, and otherwise serving the public interest, AM radio matters. It’s a vital part of the nation’s communications infrastructure, and I hope it thrives for years to come....”<sup>6</sup>

7. Yet, the Commission, in its First Report and Order, acknowledged reality: “AM listenership has nevertheless declined with the rise of newer, higher fidelity media alternatives, as well as the rise in environmental noise and interference from man-made sources....”<sup>7</sup> And put more bluntly by the current Chairman, “[T]he AM band is struggling. Signal quality is low.

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<sup>4</sup> *Ibid.*

<sup>5</sup> *Revitalization of the AM Radio Service*, First Report and Order, Further Notice of Proposed Rule Making and Notice of Inquiry 30 FCC Rcd 12145, (2015), (*Revitalization of the AM Radio Service*, First Report and Order), ¶ 3.

<sup>6</sup> *Revitalization of the AM Radio Service*, Second Report and Order, 32 FCC Rcd 1724 (2017), Statement of Chairman Ajit Pai, at p. 10.

<sup>7</sup> *Revitalization of the AM Radio Service*, First Report and Order, ¶ 3.

Listenership is down. Advertising revenue is declining. And for a generation, the FCC has been on the sidelines....”<sup>8</sup>

8. Seeking to redress past inaction and pursuing the goal of achieving greater AM/FM broadcaster parity, the Commission’s 2015 First Report and Order in MB Docket 13-249 threw AM broadcasters a lifeline. The Commission enacted substantive, meaningful initiatives to enhance AM Radio’s economic viability by increasing the opportunities whereby AM licensees and permittees could acquire cross-service FM translators. Romar welcomed the Commission’s action. Whereas cross-service FM translators may not remedy all of AM radio’s technical handicaps, the facilitating rule revisions and licensing initiatives constitute a necessary first step. Stated the Commission regarding its cross-service FM translator opportunities: “These steps will provide AM broadcasters with substantial assistance while the Commission continues to work on addressing the AM band’s long-term technical challenges.”<sup>9</sup>

9. The Commission’s two-pronged cross-service translator initiative in MM Docket No. 13-249 is nearing its culmination. And without a doubt, the initiative has been welcomed enthusiastically by the AM broadcasting community. In the first stage of the process, during 2016, more than 1000 applications were filed by AM licensees and permittees to purchase and modify existing FM translator authorizations, purchasers often relocating such translators to new communities,<sup>10</sup> so as to rebroadcast their new owners’ AM stations.<sup>11</sup> Then, from July through

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<sup>8</sup> *Revitalization of the AM Radio Service*, Second Report and Order, *Supra*, Statement of Chairman Pai, at p. 10.

<sup>9</sup> *Revitalization of the AM Radio Service*, First Report and Order, ¶ 12.

<sup>10</sup> Under the terms of this initiative, purchased translators could be relocated within a 250-mile radius. See *Revitalization of the AM Radio Service*, First Report and Order, ¶ 12.

<sup>11</sup> *Revitalization of the AM Radio Service*, Second Report and Order, *Supra*, ¶ 1.



August 2017, commencing the second phase of this initiative (Auction 99), the Commission accepted applications for new cross-service FM translators by the licensees and permittees of Class C and Class D AM facilities.<sup>12</sup> Class C and D licensees were deemed most in need of cross-service translators due to their AM stations' power limitations or lack of protected full-power nighttime service. Hundreds more cross-service FM translator applications were subsequently tendered. And as the final step, the Commission, in January 2018, opened its second and final filing window for new cross-service FM translator construction permits, this final auction window (Auction 100) open to all remaining AM licensees and permittees.<sup>13</sup> Applicants' initial "short-form" expressions of interest were required to be later confirmed by long-form applications, providing said short-form applications were not mutually-exclusive with any other filing. Mutual-exclusivities, when they occur, were to be resolved through auction.

10. According to this petitioner's count, some 1,035 applications for new cross-service FM translators were successfully tendered by AM licensees and permittees in Auction 99, approximately 846 of those applications deemed "singletons," non-mutually exclusive filings not subject to auction.<sup>14</sup> In the more recent Auction 100 filing open to most other AM licensees and permittees, another 828 translator applications were sought, some 669 of the applicants also

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<sup>12</sup> See *Filing Instructions for Cross-Service FM Translator Auction Filing Window for AM Broadcasters to be Open July 26-August 2, 2017*, Public Notice, 32 FCC Rcd 4663, 4676, (2017).

<sup>13</sup> See *Filing Instructions for Cross-Service FM Translator Auction Filing Window for AM Broadcasters (Auction 100) to be Open January 25-January 31, 2018*, Public Notice, 32 FCC Rcd 10173 (2017).

<sup>14</sup> See Attachment A, *Singleton Tech Box Proposals Subject to December 21, 2017, Filing Deadline, Media Bureau Announces FM Translator Filing Window for Long-Form Applications*, Public Notice, DA 17-1069, Nov. 1, 2017; also Attachment A, *FM Translator Mutually Exclusive Applications Subject to Auction, Settlement Period Announced for Cross-Service FM Translator Mutually Exclusive Applications for Auction 99*, Public Notice, 32 FCC Rcd 9716 (2017).

designated as “singletons,” not subject to auction.<sup>15</sup> The Commission began receiving the long-form legal and technical submissions for Auction 100 singletons in March 2018, and most of those applications are currently under review.<sup>16</sup> By the date of this Petition’s submission, the award of Auction 100 singleton construction permits has begun. With perhaps nearly 3,000 translator applications tendered in either the purchase-modification or new station prongs of this initiative, the opportunities for cross-service broadcasting have been well-received by the AM spectrum’s often-struggling, and also dwindling, fraternity of entrepreneurs.

11. Romar observes, however, that a few AM aspirants, itself included, have been caught in the crossfire of this procedural evolution; having made painful calculations under past and present reality, yet encouraged by the expansive opportunities which lie ahead. Here, Romar will use its own example to demonstrate these permittees’ dilemma:

12. Romar Communications Inc., a brother-sister team with past broadcast management and journalistic experience in the Ithaca, NY market, filed its first application for a new AM broadcast station to serve Lansing, NY in 1987; yes, 31 years ago!<sup>17</sup> The winding path walked by Romar with its successive applications is long. It’s a matter of Commission record and need not be recited here. Romar’s current authorization under BNP-20020522AAM was

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<sup>15</sup> See Attachment A, *Singleton Tech Box Proposals Subject to May 9, 2018, Filing Deadline, Media Bureau Announces Auction 100 FM Translator Filing Window for Long-Form Applications*, Public Notice, DA 18-256, Mar. 15, 2018; also Attachment A; *FM Translator Mutually Exclusive Applications Subject to Auction, Settlement Period Announced for Cross-Service FM Translator Mutually Exclusive Applications for Auction 100*, Public Notice, DA 18-332, Apr. 3, 2018.

<sup>16</sup> See *Media Bureau Announces Auction 100 FM Translator Filing Window for Long-Form Applications*, *Supra*.

<sup>17</sup> See Construction Permit File No. BP-19870331AH, dismissed Mar. 13, 1989; Petition for reconsideration denied, Feb. 28, 1990; *also* Construction Permit File No. ARN-19900405BX, returned June 6, 1990, Petition for Reconsideration and Reacceptance denied, Nov. 9, 1995.

initially filed in 1997 and then delayed for more than a decade, primarily because of the Commission's competitive auction procedures.<sup>18</sup> In April 2016, after Commission processing staff instructed Romar to severely reduce its application's daytime power and coverage area, Romar's construction permit was granted. Assured of nothing more than a stand-alone, somewhat technically-compromised facility at that point, Romar's owners faced a tough choice: either swallow hard and invest hundreds of thousands of dollars in an increasingly risky capital-intensive venture, or else walk away from three decades of professional planning.

13. The AM broadcast marketplace is far different now than it was in 1987. As the Chairman and others have observed, AM signal quality is continually eroding. Computer drone and the static from poorly-constructed electric transmission lines invade one's car receiver as one drives down any street. The receiver, itself, is of lesser quality; and the man-made interference more prolific. Couple that with the state of Main Street America today; more big-box and online retailing; fewer sales by the reliable hometown advertiser. With every mom-and-pop going-out-of-business sale comes the reduction in the local broadcaster's cash flow. To attempt to Do Radio Right today is to struggle. To attempt that feat in a highly-consolidated, FM-centered marketplace with only an AM signal is effectively to write your station's own death notice.

14. So, before Romar hoists steel into the air and plows copper into the ground, it must be assured that a cross-service FM translator will be available as a secondary transmission source and hold that assurance on Day One. Of course, that assurance cannot now be made. Romar's recently-filed translator application must still survive engineering review. What's more, just days before this petition's filing, a national coalition of LPFM advocates filed an

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<sup>18</sup> See BNP-19971126AH, predecessor to BNP-20020522AAM, proposing identical facilities.

Informal Objection against hundreds of applications in Auction 100, Romar's included.<sup>19</sup> Romar has less than twelve months left on its AM construction permit. Even if one ignores the lead time it takes to get a new four-tower DA-2 AM station constructed and running, it's conceivable that the referenced Informal Objection, and perhaps others, will not be resolved before the Romar AM CP expires. Other new station entrants, no doubt, face similar challenges.

#### **IV. The Rationale behind Amending Section 73.3598**

15. By amending § 73.3598 of the Rules with insertion of the language Romar proposes, the Commission would assure that any authorized, yet unlicensed, AM New or Major Change construction permit will be "in sync" with the new cross-service FM translator which would serve that AM station as a necessary complement. The holder of an AM CP would not be faced with a "build-or-not-build" dilemma, uncertain as to whether his or her cross-service translator would be approved, or whether such approval would come soon enough so as to coincide with that of the AM station which must be built by its CP's completion date.

16. Should the Commission, as Romar hopes, advance this petition to the rulemaking stage, Romar anticipates commenters will be invited to suggest alternative time frames for the duration of any discretionary extensions of completion which the holders of AM construction permits might request. While Romar remains open to the wealth of commenter input which the rulemaking procedure encourages, this petitioner submits that *the later of 18-month or two year* extension period which Romar has suggested makes logical sense.

17. Under Section 73.3598, most broadcast construction permits, except in those

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<sup>19</sup> See *Informal Objection by the Center for International Media Action, Common Frequency, Inc. and Prometheus Radio Project*, filed May 16, 2018. The commonly-worded Informal Objection was filed against some 998 long-form and short-form cross-service FM translator applications, Romar's included.

limited circumstances noted in that Section, run for a non-extendable 36 months, just three years. AM permittees not confident of a cross-channel FM translator's availability or its eventual authorization, may, as has Romar has chosen to do, await grant of the translator application before commencing AM station construction. Upon the translator CP's grant, the AM permittee has no further reason for delay. He or she should get moving on her project. But AM station build-outs take time. It would seem to Romar to make logical sense that a construction extension *half as long* as that initially authorized be added to the original construction permit so as to cover all contingencies. Land must be acquired; equipment purchased, antenna systems erected; studios built; not to mention the often-required directional antenna proof-of-performance.

18. But similarly, the cross-service FM translator also would need time to be built. The translator's construction permit would carry its own three-year construction period. Nonetheless, the permittee, by necessity, might require a quicker build-out so as to sign-on the translator simultaneously with its AM counterpart. The AM CP would likely have already run a considerable period of time; indeed, it may almost have run out. To accommodate the construction and testing needs of both the AM station and the cross-service FM translator's distinct authorizations, a reasonable compromise would be that of allowing the AM permittee to seek an extension of completion date to no longer than eighteen months beyond that of the AM construction permit's expiration date *or* two years beyond the grant date of the cross-service FM translator, *whichever comes later*. Romar welcomes other suggestions should its proposal be advanced by the Commission for public comment in a Notice of Proposed Rule Making.

19. Romar suggests that any revision of Section 73.3598 also include a provision allowing an AM permittee to seek tolling of his or her own AM station's completion date should

administrative or legal circumstances unexpectedly delay Commission resolution of the cross-service FM translator's own authorization. For example, market competitors might file Informal Objections or Petitions to Deny against the cross-service translator. Interference issues might be alleged. Or, as already has occurred with the Auction 100 filings, national parties might lodge blanket objections.<sup>20</sup> Under such circumstances, since the translator's fate is in doubt, so too would be the AM station's prospect of viability. Only when *both* the AM CP and the translator's CP are in hand would the permittee have the confidence required to build either. Any revised Rule affecting the completion of construction should recognize the reality of the contemporary AM marketplace and the logistical obstacles which an AM permittee may encounter.

20. Furthermore, Romar has proposed that any extension of a permittee's AM construction permit be discretionary with the processing staff. Romar also proposes that successive extension applications not be entertained. There may be unique circumstances in which an extension of construction completion would stand as facially inconsistent with the letter and/or the spirit of the Commission's Rules. At a minimum, a permittee seeking extension of his or her AM construction permit should make a reasonable showing as to the public interest value of his or her request. A brief summary of the permittee's own circumstances, a brief overview of the chosen market's competitive dynamics, and a demonstration of good faith efforts to initiate and advance the AM station's construction are among the criteria Media Bureau staff could consider in their review.

## **V. Public Interest Objectives**

21. From the statements on record by both the Commission and its individual members, it becomes self-evident that AM radio deserves to be both preserved and promoted.

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<sup>20</sup> *Ibid.*

And those few, brave entrepreneurs, like Romar, which and who seek to license new or upgraded AM facilities should be encouraged. The rule revisions advanced in this Petition should facilitate intelligent decisionmaking in bringing new players to the field of AM competition. And the infusion of new voices to the often over-consolidated broadcast marketplace cannot help but expand the choices available to the listening public and thus benefit their interest. True, for reasons already stated, the AM operator—especially, the stand-alone operator—places herself at a technical and competitive disadvantage. But with a cross-service FM translator at her disposal, the station stands a fighting chance of not being ignored by an audience that increasingly has gravitated, sometimes exclusively, to FM. Rule changes which enable the AM permittee to accommodate the cross-service FM translator within that permittee's investment commitments, construction timetables, and marketing strategy enable the addition of a select group of fresh voices to the AM spectrum, solid participants who would be provided improved prospects for survival and success.

22. The downside of this petitioner's initiative would appear to be minor, should any downside exist at all. At present, there is little, if any, burgeoning demand for new AM facilities. The Commission's last filing window for new or major modified AM applications was in 2004.<sup>21</sup> While the time may be ripe for another such AM auction filing window, no such window, to Romar's knowledge, has been planned.

23. Therefore, Romar maintains little administrative harm would arise by the extension of existing, unexpired AM construction permits for another 18-24 months. AM permittees would be accorded a reasonable opportunity to recalibrate their plans to mesh with the new marketplace reality that companion cross-service FM translators offer. The resulting delay

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<sup>21</sup> See AM Broadcast Auction 84.

in any construction permit's expiration would likely disadvantage few, if any, other broadcast licensees or applicants. The delay would certainly not compromise the public interest. While extended construction periods for new or major change facilities might preclude a limited few incumbent licensees from seeking facility improvements through minor change applications, the impact upon such parties would likely be a minor inconvenience and a delay that's only temporary. In any event, the tradeoff between the infusion of new voices within communities and the upgrade of stations already in existence would likely weigh in the new entrants' favor.

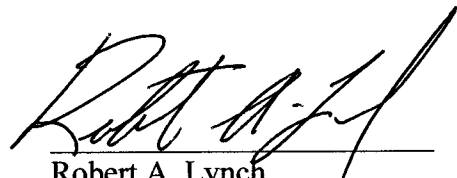
## **VI. Conclusion**

24. Romar Communications Inc. believes good cause exists to amend Section 73.3598 of the Rules, as Romar has proposed, so as to authorize staff within the Media Bureau to grant, upon application, a one-time discretionary extension of completion for New or Major Change construction permits affecting a limited number of AM Broadcast permittees; and also to allow the tolling of new or major change AM construction permits for which cross-service translators have been requested, but not yet authorized. Romar maintains its proposed rule revisions would benefit the public interest, as well as the interests of the affected AM permittees.

25. Upon consideration of this Petition, Romar urges the Commission to offer this petition for public comment in a Notice of Proposed Rule Making; and then, following comment, to adopt the requested amendment of the Rules in an expeditious manner.

Respectfully submitted,

May 29, 2018

  
Robert A. Lynch  
President  
Romar Communications Inc.