

BEFORE THE
Federal Communications Commission
WASHINGTON, D. C. 20554

In re Applications of) MB Docket No. 17-85
)
Entercom Communications and CBS)
Radio Seek Approval to Transfer)
Control of and Assign FCC)
Authorizations and Licenses)

TO: Office of the Secretary

ATTN: Chief, Media Bureau

**MOTION FOR LEAVE TO FILE
SECOND SUPPLEMENT TO PETITION TO DISMISS OR DENY**

Edward R. Stolz II d/b/a Royce International Broadcasting Company (Stolz), Golden State Broadcasting, LLC (Golden), Silver State Broadcasting, LLC (Silver) and Major Market Radio, LLC (Major) (collectively "Petitioners"), by their attorney, hereby respectfully submits this Motion for Leave to File a First Supplement to their May 1, 2017 "Petition to Dismiss or Deny". In support whereof, the following is shown:

1. In the FCC's Public Notice of March 31, 2017 setting the procedural dates for this proceeding, DA 17-299, the Commission wrote that: "Submissions after the pleading cycle has closed that seek to raise new issues based on new facts or newly discovered facts should be filed within 15 days after such facts are discovered" (DA 17-299 at 3). In this instance, the fifteenth day after the incident described herein was Saturday,

July 1, 2017; this supplement is being filed on the first working day thereafter, and thus is within the time frame for pleadings based on newly discovered facts established in DA 17-299. 47 C.F.R. §1.4(j).

2. This supplement involves the "CBS Evening News" broadcast of June 16, 2017. The pertinent excerpt can be seen on the CBS Evening News youtube.com channel, <https://www.youtube.com/watch?v=gHCxuuaTWq8>; this serves as an admission against interest. Also, the FCC can take official notice that the broadcast did occur.

3. The above-described June 16 broadcast brought the basic character qualifications of the principals of the CBS organization into further question. Our Second Supplement makes the legal arguments why the Commission must complete an investigation of the CBS News operation for possible "intentional news distortion" before it can or cannot make the 47 U.S.C. §309(d) statutory finding that CBS Corporation and its principals possess the basic qualifications to be Commission licensees and that a grant of the above-captioned applications would serve the public interest, convenience and necessity.

WHEREFORE, it is urged that this Motion for Leave to File a Second Supplement **BE GRANTED** and that the accompanying "Second Supplement to Petition to Dismiss or Deny" **BE CONSIDERED**.

Respectfully submitted,

EDWARD R. STOLZ II, d/b/a ROYCE
INTERNATIONAL BROADCASTING COMPANY
GOLDEN STATE BROADCASTING, LLC
SILVER STATE BROADCASTING, LLC
MAJOR MARKET RADIO, LLC

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By _____
Dennis J. Kelly
Their Attorney

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DATED: July 3, 2017

CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing "Motion for Leave to File, etc." have been served by e-mail and first-class United States mail, postage prepaid, or by e-mail only where shown by "*", on this 3rd day of July, 2017 upon the following:

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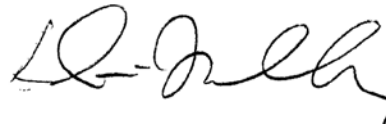
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