

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

In the Matter of)
Amendment of Part 74 of the Commission’s Rules) MB Docket No. 18-119
Regarding FM Translator Interference) FCC 19-40

REQUEST FOR STAY

1. The LPFM Coalition (“LPFM Coalition”), through counsel, hereby submits this Request for Stay (“Stay Request”) of the Commission’s order (“Final Order”) to amend Part 74 of the Commission’s Rules Regarding FM Translator Interference, as released on May 9, 2019 in FCC 19-40, and published in the Federal Register on June 14, 2019.¹

2. The LPFM Coalition is concurrently filing a Petition for Reconsideration (“Petition”) of the Final Order and hereby incorporates by reference the arguments made therein in this Request

3. While this Petition is pending, the Commission should stay implementation of the administrative rule changes in the Final Order, if not in full, at least for those specific issues listed in paragraph 7 of the Petition. Such a stay should remain in effect until final resolution of this Petition and the time is passed until appeals involving the Petition and Final Order are no longer no longer subject to continuing or further appeal, whether administrative or judicial, or the time has passed for rescission on the Commission’s own motion following expiration of all opportunities for further appeal (“Finality”).

4. Grant of such a stay would serve the public interest in administrative certainty and administrative efficiency. They would also conserve resources of regulated parties who may

¹ 84 FR 277374

otherwise have to divert resources from broadcast programming and operations to legal fees on fluctuating compliance standards unless and until the issues therein are resolved.

5. For the all the reasons stated, the Commission should grant the stay requested for the reasons listed, as it would serve the public interest.

Respectfully Submitted,

/s/

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