

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

To: Office of the Secretary
Attn: The Commission

PETITION FOR RECONSIDERATION

Louis Vito hereby submits its petition for reconsideration (“Petition for Reconsideration), to the May 9, 2019 FM Translator Interference Report and Order.

SUMMARY

For many years, small broadcasters have complained about the EEO rules, not for their laudable goals, but rather because of the required burdensome paperwork and nonproductive actions required. The proposals below envision a re-allotment of the EEO paperwork and burdens by continuing for larger broadcasters the responsibilities for documentation and supplemental initiatives, and in return increasing the job availability information available from smaller broadcasters that often serve as entry-points into the broadcasting industry.

The burden of bringing diversity to our industry in ways that work is proposed to be placed upon larger broadcasters with the resources, rather than foisted upon smaller entities for whom just finding employees is a challenge. Each of the proposals is mutually-complementary – the adoption of one without the others will be unfair to smaller broadcasters.

The Joint Commenters advocate in Proposal One for the removal of the Section 73.2080(d) small station exception for notifications of each fulltime employment vacancy including now-exempted entry-level stations. Proposal Two advocates for

a pragmatic and sensible definition of employment unit that includes all employees in a broadcast station entity. Proposal Three asks that the Section 73.2080(d) small station exemption number be set for the entire broadcasting entity at 50 employees, the number regarded by the human resources profession as demarcating the smaller from the larger entities.

Respectfully submitted,

By 
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July 15, 2019