

18-184

From: [Matt Wesolowski](#)
To: [Alexander Sanienis](#); [Michael Scurato](#); [James Bradshaw](#); [Albert Shuldiner](#)
Subject: FCC Visit (fwd)
Date: Friday, July 19, 2019 3:57:57 PM

Gentlemen -

I wanted to send a copy of an email that I had sent to Michelle Bradley at REC Networks this week regarding her recent visit to the Commission. I know that she covered a variety of topics, including the FM Class C4 initiative and the related WRTM-FM waiver-based 12kW application (BPH-20180716AAC).

I am not making these points to the Commission, but rather, to Michelle directly. If this message is in violation of ex-parte rules, then please disregard.

I sincerely appreciate your efforts and consideration of this issue.

Respectfully,

Matthew Wesolowski
SSR Communications, Inc.
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----- Forwarded message -----

Date: Thu, 18 Jul 2019 18:25:27 -0500 (CDT)
From: Matt Wesolowski <matt@wyab.com>
To: Michelle Bradley <mae@recnet.com>
Subject: FCC Visit

Michi -

I read over your ex-parte - congratulations on getting somewhere with the LPFM initiatives... I am jealous! I support LP-250, not sure why they aren't considering...

I am not sure that I agree with the interpretation of Section 5 of the Local Community Radio Act with respect to the pending WRTM-FM Class C4 waiver filing though. I do not see the violation, as the waiver does not seek to treat secondary services as primary, but rather, just adds protection of them as a condition for being able to apply for the waiver.

To me, a waiver must meet certain pre-requisites, even if they are not legally defined. For example, the Mattoon Waiver ultimately required that the subject translator rebroadcast an AM station, but the translators involved were otherwise previously free to rebroadcast any AM, FM, or NCE FM facility. There was no legal requirement for the translator to rebroadcast an AM station from the start, but it was a condition necessary in order to grant the waiver.

I could be way wrong, I will be the first to admit. I think, however, that the WRTM-FM waiver is not going to open up a floodgate of similar applications (I am thinking under 20-30 in total, fewer than Raleigh

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Waiver or Mattoon Waiver cases), and definitely not a precursor to secondary services getting primary status.

I hope that you are well. WAY TO GO on your lobbying for LPFM. I am really proud of the progress that you have made, and you're almost doing it single-handedly it seems. I continue to root for LP-250 and would do anything that I can in furtherance of that effort.

Thanks!

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