

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

**REPLY TO OPPOSITION TO
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 submit this Reply to the Opposition filed by CBS Corporation and CBS Radio, Inc. to the July 3, 2017 Second Supplement to their May 1, 2017 "Petition to Dismiss or Deny". In support whereof, the following is shown:

1. Scott Pelley said what he said. CBS put his words on their own CBS Evening News channel on youtube.com, <https://www.youtube.com/watch?v=gHCxuuaTWq8>; as we noted in our [Second Supplement](#), this serves as an admission against interest.

2. CBS claims that this was an editorial by Pelley, whom CBS fired as anchor of the CBS Evening News two weeks before. However, the program is entitled "CBS Evening News", not "CBS Evening Editorials" (although perhaps it ought to be, so slanted is its overall news presentation).

3. It really does appear that CBS, in league with other "elites" in the Washington-New York-Boston corridor, means to engage literally in the politics of personal destruction to bring down the Republican Party's control of the federal government. CBS, like other "mainstream media" outlets, does not provide an even-handed presentation of national and international news, but rather focuses on trivial matters derogatory to President Trump and Republican members of Congress. By contrast, CBS covers up the disastrous reign of the Marxist dictator in Venezuela. The Media Research Center has chronicled this: <http://archive2.mrc.org/biasalerts/networks-minimize-coverage-anti-socialist-protests-venezuela>.

4. CBS's overall management of its news operation constitutes "intentional news distortion", as it conceals the horrors of Marxism as practiced in places like Venezuela, while constantly broadcasting "fake news" derogatory to the foes of Marxism. The public interest, convenience and necessity is not well served by the CBS parties continuing to hold FCC broadcast station licenses.

5. If the President of the United States is serious about combating "fake news" outfits like CBS, then the FCC must grant our petition and designate some kind of an evidentiary hearing, either a hearing on the grantability of the above-captioned applications, or a Section 403 hearing, where it can be fully and fairly determined whether CBS has engaged in "intentional news distortion", and, if so, whether CBS Corporation and its subsidiaries should be disqualified from holding broadcast station licenses.

WHEREFORE, it is urged that this "Second Supplement to Petition to Dismiss or Deny" **BE CONSIDERED ON THE MERITS** and that the above-captioned applications be dismissed, denied, designated for hearing with the undersigned parties as intervenors/parties respondent, or that a Section 403 proceeding be commenced before an independent Administrative Law Judge to determine whether CBS Corporation has engaged in "intentional news distortion" and/or violations of the above-referenced sections of the Criminal Code of the United States, which in this case are broadcast-related felonies, and, if so, whether CBS Corporation possesses the basic qualifications to be a Commission licensee.

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



By _____
Dennis J. Kelly
Their Attorney

LAW OFFICE OF DENNIS J. KELLY
Post Office Box 41177
Washington, DC 20018
Telephone: 202-293-2300
E-mail: dkellyfcclaw1@comcast.net

DATED: July 28, 2017

CERTIFICATE OF SERVICE

It is hereby certified that true copies of the foregoing "Reply, 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 28th day of July, 2017 upon the following:

Meredith S. Senter, Jr., Esquire

Laura M. Berman, Esquire

Lerman Senter PLLC

2001 L Street, NW, Suite 400

Washington, DC 20036

msenter@lermansenter.com

LBerman@lermansenter.com

Counsel for CBS Broadcasting, Inc. and subsidiaries

David H. Solomon, Esquire

J. Wade Lindsay, Esquire

Wilkinson Barker Knauer, LLP

1800 M Street, NW, Suite 800N

Washington, DC 20036

DSolomon@wbklaw.com

WLindsay@wbklaw.com

Counsel for Entercom Communications Corp.

Carrie A. Ward, Esq.

Entercom Communications Corp.

Entercom License, LLC

401 E. City Avenue, Suite 809

Bala Cynwyd, PA 19004-1900

cward@entercom.com

Nancy A. Ory, Esq.

Lerman Senter PLLC

2001 L Street, NW, Suite 400

Washington, DC 20036

nory@lermansenter.com

Counsel for Entercom Divestiture Trust

Michael Wagner, Esq.*

Audio Division, Media Bureau

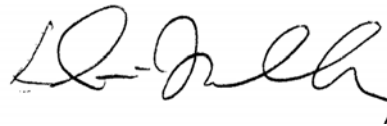
Room 2-A523

Federal Communications Commission

Washington, DC 20554

Michael.Wagner@fcc.gov

Stephen Svab, Esq.*
Audio Division, Media Bureau
Room 2-A802
Federal Communications Commission
Washington, DC 20554
Stephen.Svab@fcc.gov

A handwritten signature in black ink, appearing to read "D. Kelly", written in a cursive style.

Dennis J. Kelly