



July 31, 2017

**VIA HAND DELIVERY**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC 20554

**Re: MB Docket No. 17-105**

Dear Ms. Dortch:

I, Erik Peterson, the Vice President of Engineering for Spanish Broadcasting System (“SBS”), have reviewed the Comments of Shainis & Peltzman, Chartered which were filed in the above-referenced Docket. I am also familiar with the Petition for Rulemaking filed by Geo-Broadcast Solutions, RM No. 11659, which is referenced in the Shainis & Peltzman Comments.

SBS is licensee to 12 stations in New York, Miami, Los Angeles, Chicago, San Francisco and Puerto Rico and is one of the largest Hispanic radio broadcasters in the United States. SBS agrees with the recent Commission’s comments that rules that are archaic because of technological changes or do not help the public interest should be eliminated. We believe that a radio station should be allowed to use its signal to the maximum benefit to the station and the public, as long as it does not violate indecency rules or create interference.

I am familiar with the recent technology advances that have been tested in Experimental Authorizations described in the Shainis & Peltzman Comments above. After hearing the results

of that test, I have no doubt that the system used to deliver different programming on multiple boosters works and strongly support the new technology.

I urge the Commission to take whatever steps it deems appropriate to expeditiously modify Section 74.1231(i) of the Commission's rules, allowing for origination of programming on booster facilities. As explained in the Shainis & Peltzman Comments, the public interest benefits are significant. I believe that adoption of this minor rule change will allow for a much needed boost for the radio industry, the economy, and not least, the public welfare.

A handwritten signature in black ink, appearing to read "Erik Peterson", written over a horizontal line.

Erik Peterson  
Vice President of Engineering