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August 13, 1993

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
Washington, D. C. 20554

REFERENCE: Notice of Inquiry MM Docket 93-177

Dear Mr. Secretary:

This letter is written to request an extension of the time period for comments in the above noted proceeding.

As stated in the Notice of Inquiry, the subject of this proceeding has not been revisited in depth by the Commission since the late 1980's. The technical analysis necessary to provide substantive information for the Commission's review is very complex. The Notice of Inquiry was announced in late July with only a one month comment period, a period which coincides with vacation schedules and with the time of the year when AM antenna field work is most easily performed. Thus many of the most qualified potential sources of comment will be unable to provide extensive and meaningful comments due to the short time period which has been provided.

It is our understanding that the Association of Federal Communications Consulting Engineers has requested an extension of the comment time in MM Docket 93-177 for an additional approximately 90 days, until October 29, 1993. We fully support this request.

Respectfully Submitted,

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