Repp Law Firm

September 3, 2015

Repp Law Firm
1629 K Street, N.W., Suite 300
Washington, D.C. 20006-1631
T 202.656.1619
F 202.400.3737
marissa@repplawfirm.com
www.repplawfirm.com

Via Electronic Filing

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* Communication with Valery Galasso, Policy Advisor to Commissioner Jessica Rosenworcel
MB Docket No. 13-249 (Revitalization of the AM Radio Service)

Dear Ms. Dortch:

The following meeting summary is submitted pursuant to 47 C.F.R. Section 1.1206(b)(1).

On September 1, 2015, Jeff Littlejohn, Executive Vice President - Engineering & Systems Integration, iHeartCommunications, Inc. (together with iHeartMedia + Entertainment, Inc., "iHeart"), Sara Morris, Senior Director, Government Affairs, iHeart, and the undersigned, met with Valery Galasso, Policy Advisor to Commissioner Jessica Rosenworcel.

Mr. Littlejohn expressed that the AM community is pleased that the AM Revitalization proceeding is moving forward and that there are several proposals that have garnered universal or near-universal support: elimination of the "Ratchet Rule"; reductions in community of license coverage requirements; elimination of minimum efficiency standards; and defining the geographic restriction on FM translators rebroadcasting AM stations as either the 2 mV/m daytime contour *or* a 25-mile radius from the AM transmitter site.

As to a window for FM translator applications, iHeart stressed that any such window should be open equally to all classes of AM stations, as all AM stations have been impacted by interference issues. Moreover, such a window, whether for new FM translators or for more flexible modification of existing FM translator authorizations, should be of a set duration and capable of quick implementation, as AM stations need relief now.

Regarding suggestions by commenters to reduce interference protections for Class A AM stations (such as skywave protections and changes to pre-sunrise and post-sunset authorizations), Mr. Littlejohn noted that a further record would need to be developed before implementation, as recognized by the Commission in its *Notice of Proposed Rule Making* in this docket. iHeartMedia's initial analysis of the harm of reducing Class A skywave protection to Class B status has identified over 600,000 existing, actual listeners of Class A stations, accounting for 13 million listening hours per month, who would lose protection from interference. The Commission should not drive away existing listeners to the AM band, but should focus on efforts that protect and strengthen the AM band.

Respectfully submitted,

REPP LAW FIRM

By: _____
Marissa G. Repp

Counsel to iHeartCommunications, Inc.

cc: Valery Galasso (via e-mail)