



NATIONAL ASSOCIATION OF BLACK OWNED BROADCASTERS

1201 Connecticut Avenue, N.W., Suite 200, Washington, D.C. 20036
(202) 463-8970 • Fax: (202) 429-0657 • E-mail: nabobinfo@nabob.org

BOARD OF DIRECTORS

JAMES L. WINSTON
President
MICHAEL L. CARTER
Vice President
KAREN E. SLADE
Treasurer
LOIS E. WRIGHT
Counsel to the Board
ARTHUR BENJAMIN
CAROL MOORE CUTTING
ALFRED G. LIGGINS
JERRY LOPES
DUJUAN MCCOY
STEVEN ROBERTS
MELODY SPANN-COOPER
JAMES E. WOLFE, JR.

September 15, 2015

VIA ELECTRONIC FILING

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

Re: **Notice of Ex Parte Communication, MB Docket No. 13-249,
Revitalization of the AM Radio Service**

Dear Ms. Dortch:

Today, the undersigned President of the National Association of Black Owned Broadcasters, Inc. ("NABOB") had a telephone conversation with Maria Kirby, Legal Advisor, Media, Consumer and Governmental Affairs, and Enforcement, in the office of Chairman Tom Wheeler. In that conversation, the undersigned presented the following comments on behalf of NABOB:

FM Translator Filing Window - NABOB agreed with those commenters who support opening a filing window for only AM station licensees to apply for new FM translators. NABOB proposed that the Commission should open two filing windows. The first filing window should be limited to only licensees of Class C and Class D AM stations, because these stations operate with limited or no nighttime power. After completion of selection of licensees in the first filing window, the Commission could open a window for Class A and Class B licensees. Each licensee should be permitted to obtain only one FM translator per AM station.

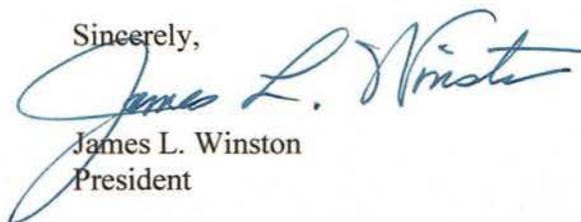
Waiver window to move existing translators 250 miles – NABOB stated that this proposal, if adopted, should be adopted along with, and not instead of, the proposed FM translator filing window. NABOB noted that adoption of both

Ms. Marlene H. Dortch
September 15, 2015
Page 2 of 2

proposals gives smaller station owners a better chance of finding success in one of these two paths to FM translator ownership. NABOB expressed concern that, if the proposed 250 mile waiver policy is adopted as the only opportunity for small AM station licensees to acquire a license, it will be too limited. NABOB noted that smaller stations would not have the financial resources needed to compete with larger stations to purchase existing translators. NABOB also noted that, by limiting the waiver period to only a 60 day window, smaller stations could be denied the time needed to acquire the capital to purchase a translator. NABOB noted that there does not appear to be any reason for such a limited filing window and that the waiver filing period should be a year, not 60 days.

In accordance with Section 1.1206(b) the Commission's rules, this notice is being filed in the Commission's Electronic Comment Filing System.

Sincerely,

A handwritten signature in blue ink that reads "James L. Winston". The signature is fluid and cursive, with the first name "James" being particularly prominent.

James L. Winston
President

cc: Chairman Tom Wheeler
Maria Kirby