

September 28, 2015



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

Re: Ex Parte disclosure pursuant to 47 CFR § 1.1206(b) in MB Docket13-249

Dear Ms. Dortch:

Last week I held two telephone conversations with Maria Kirby in Chairman Wheeler's office with respect to the above-captioned docket. The primary goal of my conversations was to obtain basic status and procedural information about the docket. However, in addition, I encouraged the Commission to investigate carefully the impact of proposals in this docket on LPFM stations. In particular, given that FM translators are technically identical to LPFM stations, I expressed concern that proposals not crowd or harm LPFM stations. I encouraged the Commission to be sure that all LPFM applications are finished processing before the new proposals are implemented.

I noted that REC Networks and Prometheus Radio Project¹ had expressed cautious support for a limited version of an AM window, focusing on class D or class C and D AM stations with a focus on stand-a-lone stations. The focus, as I understand it, on these stations is to ensure that the proposed policies would add new voices and aid struggling stations typically owned by underrepresented groups. I noted that once a party obtains a translator they often undertake minor modifications and other changes that could potentially negatively impact LPFM stations. I emphasized that the relative priority of LPFMs as first in time should protect LPFM stations, but asked Ms. Kirby to direct the staff to think several steps down the process to be sure LPFM stations are not inadvertently negatively impacted.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl A. Leanza".

Cheryl A. Leanza

¹ See Comments of REC Networks (filed Jan. 22, 2014); ex partes of Prometheus Radio Project (filed Aug. 5, 2013 and Dec. 16 and 24, 2013).