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March 1, 1999

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BY HAND DELIVERY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, TW-A325  
Washington, DC 20554

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MAR 1 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: MM Docket No. 98-93 EX PARTE PRESENTATION  
1998 Biennial Regulatory Review--Streamlining of Radio  
Technical Rules in Parts 73 and 74 of The Commission's Rules

Dear Ms. Salas:

The enclosed letter was sent on behalf of Northeastern University to Chairman Kennard. By this letter, copies are being sent to Dale Bickel and Peter Doyle of the Mass Media Bureau.

Pursuant to Section 1.1208(b)(1) of the Commission's Rules, two copies of this written presentation are being submitted for inclusion in the file of the above-referenced docket.

Should there be any questions, please communicate with this office.

Respectfully submitted,



William D. Wallace

Enclosure

cc: Hon. William Kennard  
Dale Bickel  
Peter Doyle

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**Congress of the United States**  
**Washington, DC 20515**

February 26, 1999

The Honorable William Kennard  
Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

Dear Chairman Kennard:

We are writing to you regarding the Federal Communications Commission's proposed Class D radio station regulations. As you consider modifications to Parts 73 and 74 of the Commission's rules, we hope you will consider the importance of the continued operation of Northeastern University's existing Class D non-commercial, educational FM station WRBB in Boston. We are concerned that the current proposal is likely to end the station, and believe minor changes to the proposed rule could preserve its existence.

As you know, on June 15, 1998, the FCC released a notice of proposed rule making, entitled "Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules". Currently, the FCC's regulations require Class D stations to protect a defined geographic signal contour of other FM stations. The FCC has proposed to modify this standard to require Class D stations, like Northeastern's WRBB, to protect a larger geographic signal area for neighboring Class B stations. Under the current rule, WRBB is able to avoid prohibited overlap, but under the proposed level, it would overlap with a Providence, RI station.

Unfortunately, there is no available FM band channel in the Boston area to which WRBB could migrate, therefore the proposed rule is likely to eliminate WRBB.

We are aware that the FCC has, in instances where it would be impossible for a station to meet the more stringent requirements of a new rule, decided not to apply the new rule to existing stations and "grandfathered" the current operation. If the FCC amends the proposed regulations to allow existing Class D stations, including WRBB, to continue to operate within their current parameters, it would preserve the benefits of the station with little impact on the FCC's overall objective.

WRBB has been in operation on its current frequency since the early 1980s. Since that time, WRBB has played a pivotal role in the education of Northeastern University students who actively manage the station and run its day-to-day operations. In addition, WRBB is a valuable provider of local news, public affairs and music to the people in Northeastern University's surrounding communities of Back Bay, Roxbury, Jamaica Plain and Dorchester.

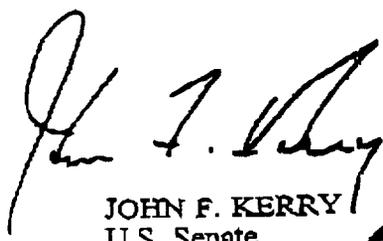
As such an important asset to Northeastern University and the local community, we feel strongly that WRBB should remain in existence. Therefore, if you adopt the expanded protection standard for Class B stations, we respectfully ask you to consider not changing the contour protection

Chairman William Kennard  
February 22, 1998  
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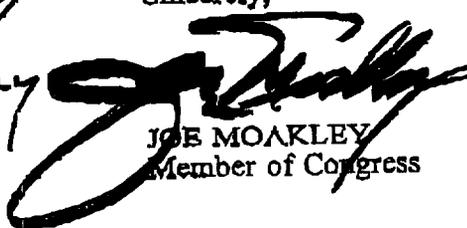
requirements in Section 73.509(b) affecting currently authorized Class D stations, but to grandfather them instead.

We appreciate your consideration of our request.

Sincerely,



JOHN F. KERRY  
U.S. Senate



JOE MOAKLEY  
Member of Congress



EDWARD MARKEY  
Member of Congress