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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

AUG 29 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Section 73.202(b) )  
Table of Allotments )  
FM Broadcast Stations )  
(Albemarle and Indian Trail, North Carolina) )

MM Docket No. 99-240  
RM - 9503

To: The Commission

**REQUEST FOR EXTENSION OF TIME TO FILE OPPOSITION PLEADING**

Susquehanna Radio Corp. ("SRC"), licensee of Station WABZ-FM, Albemarle, North Carolina, by its counsel, hereby requests an Extension of Time to File an Opposition to the Application for Review, submitted by Monroe Broadcasting Co., Inc. ("MBC"), on August 9, 2001, to the Report and Order, DA 01-1660, released July 13, 2001, in the above captioned proceeding.

In support hereof, SRC states as follows:

1. Section 1.115(d) of the Commission's Rules states that oppositions must be filed within 15 days of the date the Application for Review was filed. The deadline for the opposition was August 24, 2001. Section 1.115(f) states that an Application for Review must be served on parties to the proceeding.

2. Undersigned counsel was not properly served and only became aware of the Application for Review today. As shown on the Certificate of Service attached to the Application for Review (Exhibit A), the pleading was mailed to a previous address which was changed on March 9, 1999. Undersigned counsel filed three subsequent pleadings in this proceeding on August 23, 1999, September 7, 1999 and September 9, 1999 using counsel's current address. MBC's counsel was clearly on notice of the proper address on which to serve SRC. SRC could not have become

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Noted by [unclear] 014  
\_\_\_\_\_  
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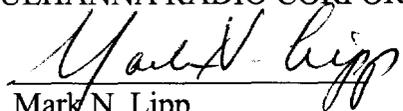
aware of the filing earlier because the Post Office's mail forwarding procedure expired more than one year ago.

3. The deadline for a Petition for Reconsideration or Application for Review was August 27, 2001 which is 30 days after publication of the R&O in the Federal Register. See Section 1.429 of the Commission's Rules. Thus, having received no such filings, SRC's counsel checked the Commission's records and discovered this filing. At this time, SRC is unaware of any other Petitions for Reconsideration or Applications for Review.

4. Accordingly, SRC requests that it be given a 15 day period until (September 13, 2001) for filing on Opposition to the Application for Review.

Respectfully submitted,

SUSQUEHANNA RADIO CORPORATION

By:   
Mark N. Lipp  
Shook, Hardy & Bacon  
600 14th Street, NW  
Suite 800  
Washington, DC 20005  
(202) 783-8400

Its Counsel

August 29, 2001

# **EXHIBIT A**

CERTIFICATE OF SERVICE

I, Stephen T. Yelverton, an attorney at law admitted to practice in the District of Columbia, hereby certify that on the 9th day of August, 2001, I have caused to be mailed, U.S. Mail, postage pre-paid, a copy of the "Application for Review" filed by Monroe Broadcasting Company, Inc., to the following persons or parties:

John I. Riffer, Esq.\*  
Associate General Counsel  
Federal Communications Commission  
Washington, D.C. 20554

John A. Karousos, Chief\*  
Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
Washington, D.C. 20554

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1850 K St., N.W., Suite 900  
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Counsel for Susquehanna Radio Corp.

Gregory E. Masters, Esq.  
E. Joseph Knoll, Esq.  
Wiley, Rein & Fielding  
1776 K St., N.W.  
Washington, D.C. 20006  
Counsel for Capstar TX Limited Partnership

  
Stephen T. Yelverton

\*Hand delivery

**CERTIFICATE OF SERVICE**

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy and Bacon, do hereby certify that I have on this 29th of August, 2001 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Request for Extension of Time to File Opposition Pleading**" to the following:

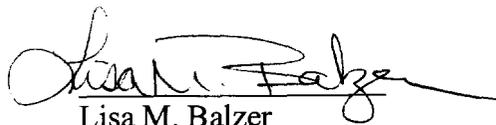
\* John A. Karousos, Chief  
Federal Communication Commission  
Mass Media Bureau  
445 12th Street, SW  
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Washington, D.C. 20554

\* R. Barthen Gorman  
Federal Communications Commission  
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Washington, DC 20006

\* HAND DELIVERED

  
Lisa M. Balzer