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APR 12 2005

Federal Communications Commission
Office of Secretary

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

In the Matter of)	
)	
Amendment of Section 73.202(b))	
FM Table of Allotments,)	
FM Broadcast Stations)	MB Docket No. 05-47
)	RM-11157
(Grosbeck and Tennessee Colony, TX)	RM-11179
)	

To: Office of the Secretary
Attn.: Assistant Chief, Audio Division
Media Bureau

REQUEST FOR EXTENSION OF TIME

Access.1 Louisiana Holding Company, LLC ("Access.1"), licensee of commercial broadcast radio stations operating in the Shreveport Urbanized Area, pursuant to Section 1.46, of the Commission's Rules, 47 CFR Section 1.46, hereby submits this Request for Extension of Time ("Request"), requesting additional time to respond to the Counterproposal submitted March 31, 2005 by Cumulus Licensing LLC ("Cumulus"), in the above-captioned proceeding.

Access.1 submits this Request, because the Counterproposal raises many issues related to matters pending in an Application for Review filed by Access.1 on March 25, 2004, in MB Docket No. 02-199, in which Access.1 has argued that the allotment of Channel 300C2 to Oil City, Louisiana should not be granted, because it would amount to a *de facto* reallocation to the Shreveport Urbanized Area. The Counterproposal also raises issues addressed by Access.1 in an Informal Objection regarding a Request for Special Temporary Authority filed by Cumulus on January 13,

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2005, in which Cumulus admits that it will not provide adequate service to Oil City, Louisiana, the community of license allotted to Cumulus in MB Docket No. 02-199.

Access.1 has its engineers analyzing the Counterproposal in light of the issues raised in these other proceedings. However, the Counterproposal is very complex and requires more time than the Commission's Rules would ordinarily permit for a response. Access.1 did not receive the copy served upon it until April 5, 2005. Although, Access.1 has been diligent in reviewing the Counterproposal, it has not been able to complete its review of the Counterproposal. Under the Commission's Rules, a response is due April 15, 2005. Access. 1 requests a brief extension of time, to April 22, 2005 to submit its response to the Counterproposal.

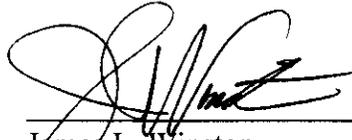
Attached hereto is an April 11, 2005 letter sent to the Commission by Access.1 regarding the STA Request, in which Access.1 summarizes the matters that have been raised by the Counterproposal with respect to the pending proceedings. As explained in the letter, Access.1 anticipates filing Comments in this proceeding explaining the relevance of those proceedings to the instant proceeding.

Access.1 submits that the issues in the other proceedings are relevant to this proceeding, and, therefore, an extension of time to permit Access.1 to fully respond to the Counterproposal will serve the public interest. Access.1 therefore requests an extension of time to April 22, 2005 to respond to the Counterproposal.

Respectfully Submitted,

**ACCESS.1 LOUISIANA HOLDING
COMPANY, LLC**

By its Attorneys,

A handwritten signature in black ink, appearing to read 'JL Winston', is written over a horizontal line.

James L. Winston
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April 12, 2005

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April 11, 2005

VIA HAND DELIVERY

RECEIVED

Marlene H. Dortch, Esq.

Secretary

Federal Communications Commission

236 Massachusetts Avenue, N.E.

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Washington, D.C. 20002

APR 11 2005

Federal Communications Commission
Office of Secretary

Re: Response to Second Supplement to Request for Special Temporary Authority
filed by Cumulus Licensing LLC, KBED(FM) (formerly KVMA-FM), Oil City,
Louisiana. Facility ID: 12414

Dear Ms. Dortch:

Access.1 Louisiana Holding Company, LLC ("Access.1"), hereby submits its Response to the "Second Supplement to Request for Special Temporary Authority to Report Permanent Solution," filed April 1, 2005, by Cumulus Licensing LLC ("Cumulus"), for station KBED(FM) (formerly KVMA-FM), Oil City ("Second Supplement").

In its Second Supplement, Cumulus purports to offer a permanent solution to the interference problem it created with KBED. However, the purported solution is nothing more than an elaborate scheme to allow Cumulus to operate on an STA -- an STA that does not provide adequate service its community of license -- for the next several years. Moreover, the new scheme proposes that Cumulus will abandon Oil City to seek an allotment for a new frequency at Waskom, Texas. Of course, the result of this new allotment will be the same: Cumulus will cover the Shreveport Urbanized Area. Thus, Cumulus seeks in its purported "permanent solution" the same result it seeks in its STA Request -- an abandonment of Oil City and coverage of the Shreveport Urbanized Area.

Access.1's engineering consultants are reviewing the convoluted scheme outlined by Cumulus, and Access.1 will file a further response to the Second Supplement after its engineers have

RUBIN, WINSTON, DIERCKS, HARRIS & COOKE, L.L.P.

Marlene H. Dortch, Esq.

April 11, 2005

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completed their review.¹ However, it is clear from an initial review of the proposal that it has far too many contingent reallocations and moves for it to be effectuated in the near future. The many preconditions that must be completed before KBED could operate on the proposed new frequency could take several years to be completed. In the meantime, Cumulus proposes to be allowed to operate pursuant to an STA that does not provide service to its requested community of license. There is nothing about this proposal that serves the public interest.

In a Supplement to its Informal Objection filed by Access.1 on February 24, 2005, Access.1 demonstrated that the inability of Cumulus to provide service to the people of Oil City is due to Cumulus's failure to notify the Federal Aviation Administration ("FAA") of its intention to operate at its proposed antenna site. Had Cumulus advised the FAA of its intent, Cumulus would have been advised prior to construction at the site that the operation on 107.9 MHz at that site would be a hazard to air navigation. Thus, Access.1 demonstrated that Cumulus should not be granted the extraordinary relief being requested here, because the problem is completely of its own making.

Moreover, in its initial Informal Objection, filed February 8, 2005, Access.1 demonstrated that, through the rulemaking process, Cumulus attempted to obtain a *de facto* reallocation of Channel 300C1 from Magnolia, Arkansas to the Shreveport Urbanized Area. Access.1 demonstrated that the instant STA Request provides additional evidence of Cumulus's intention to provide service to the Shreveport Urbanized Area, and its intention to provide only "deficient" service to Oil City. As Access.1 pointed out previously, if the objective of Cumulus is to serve Oil City, Cumulus should consider participation in the Commission's current rulemaking proceeding proposing the allotment of Channel 285A as a new frequency for Oil City.²

Instead, Cumulus has proposed this new scheme that formally abandons Oil City and purports to propose service to Waskom, Texas. This is yet another cynical move to evade the Commission's rules in order to cover the Shreveport Urbanized Area. Indeed, this whole new scheme merely underlines the hypocrisy of the original reallocation proposal for Oil City. The new scheme exposes clearly that the objective all along was to cover the Shreveport Urbanized Area. Allowing Cumulus to effectuate this new scheme would merely serve to alert future petitioners to the fact that any effort to circumvent the Commission's *de facto* reallocation policy will be allowed, and extraordinary relief is available when such schemes result in a lack of ability to serve the purported new community. This is not the message the Commission should be conveying.

¹To the extent Access.1 requires an extension of time to respond and may require leave to file a later supplement to this Response, Access.1 hereby requests such permission.

²*Amendment of Section 73.202(b), FM Table of Allotments, Lovelady, Texas and Oil City, Louisiana*, MB Docket Nos. 05-36 and 05-37, DA 05-291, released February 4, 2005.

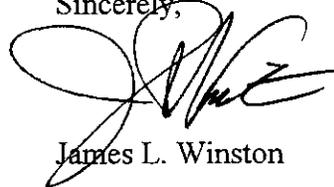
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Marlene H. Dortch, Esq.
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Therefore, as Access.1 has asserted previously, the STA should be denied, the reallocation rescinded, the allotment to Oil City deleted, and the frequency should be returned to Magnolia, Arkansas.

Please contact undersigned counsel for Access.1 should you require any additional information regarding this Response.

Sincerely,

A handwritten signature in black ink, appearing to read 'JLW', is written over the word 'Sincerely,'.

James L. Winston

JLW/kn

cc: James Bradshaw, Deputy Chief, Audio Division, Media Bureau
George Dillon, Enforcement Bureau
Mark N. Lipp, Counsel for Cumulus Licensing LLC

CERTIFICATE OF SERVICE

I, Kathy Nickens, a secretary in the law firm of Rubin, Winston, Diercks, Harris & Cooke, L.L.P., do hereby certify that the foregoing "Request for Extension of Time" was mailed this 12th day of April, 2005 to the following:

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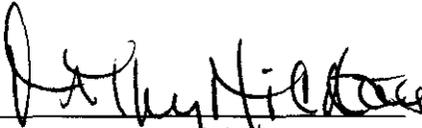
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*Delivered via facsimile


Kathy Nickens

April 12, 2005