

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

In the Matter of	)	
	)	
Petition for Rulemaking	)	RM-11599
Amending 47 CFR Part 73.99	)	
Concerning Pre-Sunrise Service	)	
Authorizations for Class D Stations	)	
in the AM Broadcast Service	)	

To: The Commission

**COMMENTS OF QUINNIPIAC UNIVERSITY**

Quinnipiac University, licensee of Class B standard broadcast station WQUN, Hamden, Connecticut (“WQUN”), by its attorneys, hereby submits Comments in support of the Petition for Rule Making filed by Richard F. Arsenault (“Arsenault Petition”) to amend Section 73.99 of the Commission’s rules to permit Class B and Class D AM stations to commence pre-sunrise authority (“PRSSA”) operations at 5:00 a.m. local time, in lieu of 6 a.m. local time. In support thereof, the following is shown:

The Arsenault Petition points out that many Class B and Class D stations currently have a uniform start time of 6:00 a.m. local time with 500 watts. As shown in the Petition, for many such stations, morning programming starts early and listeners are unlikely to set clock radios to an AM station which do not have this presunrise authority. The 5:00 a.m. first hour “morning drive” programming is geared to a significant portion of the public that start their day prior to 6 a.m. due to extended commuting times and/or early occupational clock-in requirements.

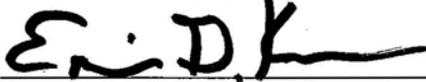
WQUN, Quinnipiac University's commercial radio station, has a diverse format that includes local news, interviews, national news and live coverage of various sports events. The station has a full news department with its news director anchoring news at 6. a.m. in the morning. WQUN's morning show features CBS News, ten minutes each hour of two local newscasts, regular traffic updates, frequent weather forecasts from a local heritage TV meteorologist, and local and national sportscasts. During the local morning show, WQUN broadcasts local community announcements and interviews – as many as 30 individual local non-profit organizations are provided coverage each weekday morning. WQUN is the recipient of numerous awards for the station's programming and service to the community, including the Community Outreach Award from the Greater New Haven Chamber of Commerce, the Best News Broadcast Service by the New Haven Advocate, a first place Associated Press Award for spot news and an Associated Press Public Service Award.

WQUN operates with 1 kw during daytime hours and 305 watts at night. The station's morning show has generated very strong audience ratings from 7 a.m. to 10:00 a.m. but has suffered during the first hour of broadcast due to the poor quality of the signal prior to the 6:00 a.m. PRSA operation. If WQUN were to be granted expanded PRSA operation as proposed in the Arsenault Petition, it would be able to begin its award-winning local morning show beginning at 5:00 a.m. WQUN concurs with the statement made in the Arsenault Petition that a grant of the proposed rule will facilitate better distribution of the broadcast spectrum, particularly in smaller communities where local radio service is generally limited and frequently served by AM stations supporting the Commission's bedrock goals of localism, competition and diversity

in the broadcast media. For the foregoing reasons, WQUN submits that the public interest will be served by a grant of the Arsenault petition.

Respectfully submitted,

QUINNIPIAC UNIVERSITY

By: 

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April 26, 2010

**Certificate of Service**

It is hereby certified that a true copy of the foregoing "Comments of Quinnipiac University" was served by first-class mail, postage prepaid, on this 26<sup>th</sup> day of April, 2010 upon the following:

Mr. Richard F. Arsenault  
Post Office Box 337  
Fortescue, NJ 08321-0337

A handwritten signature in black ink, appearing to read "E.G.K.", written over a horizontal line.

Erwin G. Krasnow