Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

December 23, 2013

Re: Notice of *Ex Parte* Presentation
MM Docket No. 99-25 – Creation of a Low Power Radio Service
MB Docket No. 13-249 – Revitalization of the AM Radio Service

Dear Ms. Dortch:

On Friday, December 20, 2013, Sanjay Jolly of the Prometheus Radio Project and his counsel, Aaron Mackey of the Institute for Public Representation (together, "Prometheus representatives"), met separately with Maria Kirby of Chairman Wheeler's office and Matthew Berry of Commissioner Pai's office.

In both meetings, Prometheus representatives commended the Audio Division for the expedient pace at which its staff has reviewed applications from the low power FM (LPFM) window that closed November 15, 2013. The Media Bureau has already released the list the list of mutually exclusive applicants, and according to the public notice the Bureau released on December 3, it will begin to issue new station construction permits to singleton applicants in January 2014.

Prometheus representatives noted that limited signal coverage remains a significant threat to the success of the LPFM service. In a 2012 survey of LPFM stations conducted by Prometheus, roughly a quarter of respondents listed limited signal coverage as a major threat to their station's viability. Prometheus representatives argued that raising LPFM's maximum effective radiated power from 100 Watts to 250 Watts and holding an FM translator window exclusively for LPFM licensees would significantly unburden LPFM stations while remaining faithful to the word and intention of the Local Community Radio Act.

With respect to the Commission's proposal for an FM translator filing window exclusively for AM stations, Prometheus representatives urged the Commission to delay any such window until all LPFM applications have been resolved. In addition, they expressed support for AM broadcasters – particularly women, minority, and single-station owners – and argued that eligibility for the AM-only translator filing window be restricted to Class C and D stations only.

Respectfully Submitted,
/s/
Sanjay Jolly
Prometheus Radio Project

cc: Matthew Berry, Maria Kirby