## Romar Communications Inc.

Robert A. Lynch Marcia E. Lynch 175 Gray Road Ithaca, New York 14850 (607) 272-8433

MAY 0.1 2015
FCC Mall Room

April 24, 2015

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

re:

Romar Communications Inc. NEW(AM), Lansing, New York Facility ID Number 136961 File Number: BNP-20020522AAM Deficiency Letter, Reply 2015 WAY -1 P 2:

Dear Ms. Dortch:

Reference is made to the letter dated March 26, 2015 from Mr. Son Nguyen, Supervisory Engineer, Audio Division, Media Bureau concerning the afore-referenced application (as amended) by Romar Communications Inc. (Romar) for a NEW AM broadcast station to serve Lansing, New York.

The referenced letter denied Romar's request to waive Section 73.37 of the Rules regarding possible receipt of prohibited daytime contour overlap by its proposed station from co-channel facility WQOR, Olyphant, Pennsylvania. Said overlap was alleged in the Informal Objection filed by Holy Family Communications (HFC), former licensee of AM station WQOR on February 11, 2004. The Audio Division's letter further indicated the Bureau had chosen to average the conflicting field measurement data submitted by Romar and HFC for distances between the two facilities, a methodology which would place Romar's application in violation of Section 73.37, earlier referenced. As such, the Audio Division indicated it would withhold further action on Romar's application for thirty (30) days so as to allow Romar to amend its application to eliminate the overlap area.

Please be advised that Romar and its consulting engineer are studying the impact of the Audio Division's decision as it would impact Romar's daytime proposal, and Romar is currently investigating potential engineering solutions. However, this firm's efforts have been complicated by the fact that the letter of March 26<sup>th</sup> provided neither Romar nor its engineer with

any Commission-drafted contour map or other graphic or mathematical exhibit which would indicate where the Division's staff have determined the prohibited WQOR interfering contour to fall. This lack of specificity has hampered Romar's attempts at a potential redesign. Romar has directed its consulting engineer to request such map or other exhibit from Commission engineering staff.

Therefore, in view of the circumstances, Romar Communications Inc. respectfully requests the Commission grant Romar an <u>additional sixty (60) days</u> from the deadline established in its March 26, 2015 letter for Romar to prepare and submit its curative engineering amendment. In view of the fact that Romar's instant application has been pending since 2002, and the identical application which accompanied and predated it (BNP-19971126AH) has been on file since 1997, and since no Commission action on Romar's latest proposal has occurred since Romar's latest amendment of June 25, 2010, Romar believes an additional sixty days' extension is properly justified under the circumstances and would incur no hardship to WQOR or to any other party, nor would it adversely impact the Public Interest.

Respectfully,

Robert A. Lynch

President

Romar Communications Inc.

cc. Denise Moline, Esq.
Counsel for JMJ Radio, Inc.
358 Pines Blvd.
Lake Villa, IL 60046-6800

A. Wray Fitch III Counsel for Romar Communications Inc. Gammon & Grange, P.C. 8280 Greensboro Drive, Seventh Floor McLean, VA 22102

Mr. Son Nguyen
Supervisory Engineer
Audio Division
Media Bureau
Federal Communications Commission

## CERTIFICATE OF SERVICE

I, Robert A. Lynch, do hereby certify that a copy of the foregoing "Deficiency Letter Reply" on behalf of Romar Communications Inc. was mailed by First Class U.S. Mail, postage prepaid, this 24<sup>th</sup> Day of April, 2015 to the following:

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

Denise Moline, Esq. Counsel for JMJ Radio, Inc. 358 Pines Blvd. Lake Villa, IL 60046-6800

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Mr. Son Nguyen Supervisory Engineer Audio Division Media Bureau Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C 20554