



Federal Communications Commission
Washington, D.C. 20554

May 28, 2015

IN REPLY REFER TO:
CN 15-456

The Honorable Suzanne Bonamici
U.S. House of Representatives
439 Cannon House Office Building
Washington, D.C. 20515

Dear Congresswoman Bonamici:

Thank you for your letter regarding the application submitted by Threshold Communications (Threshold) proposing to construct a new FM broadcast station and to move the community of license from Clatskanie, Oregon to Napavine, Washington. I appreciate the opportunity to respond.

In 2011, Threshold was the winning bidder in Commission Auction 91 for an FM allotment to serve Clatskanie. Under Commission rules, successful bidders must complete and file a "long-form" application for a construction permit, providing the engineering analysis for implementation of their bids. Threshold's long-form application proposed construction of the new station in Napavine, rather than Clatskanie. When an applicant proposes to remove AM or FM broadcast service from one community in favor of another, the Commission must undertake a review of the proposal pursuant to Section 307(b) of the Communications Act, which directs the Commission to distribute broadcast service among states and communities in a manner that is fair, efficient, and equitable. Specifically, the Commission considers the following factors in reviewing a proposed change of community of license: (1) first fulltime aural service (the proposed station is the first predicted to serve the community), (2) second fulltime aural service, (3) first local transmission service (the proposed station is the first to be licensed to the community), and (4) other public interest matters.

The Commission's Audio Division granted Threshold's long-form application on March 11, 2013, finding that the proposed change comported with 307(b) policy. On April 15, 2013, Premier Broadcasting filed a Petition for Reconsideration of the grant of Threshold's application, alleging, among other things, that Threshold had failed to comply with the Commission's rules requiring local public notice of the application. The Audio Division determined that Threshold had not complied with the local notice regulations and returned the original application to pending status on December 18, 2014. Subsequently, the Commission has received numerous informal objections to the Threshold application. The Audio Division is carefully reviewing the full record in the proceeding, including the recently filed objections and will issue a decision as expeditiously as possible.

Finally, because this matter is a contested proceeding, it is "restricted" under the Commission's *ex parte* rules. Accordingly, copies of your correspondence will be provided to counsel for Threshold and Premier and will be made a part of the record in the proceeding. Any additional correspondence filed with the Commission addressing the merits of Threshold's application also should be provided to the representatives designated below.

I hope that this information is helpful. Please do not hesitate to contact me if I can be of further assistance.

Sincerely,



Michael S. Perko

Chief, Office of Communications and Industry Information
Media Bureau

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