

Law Office of
DENNIS J. KELLY
Post Office Box 41177
Washington, DC 20018

MEMBER, DISTRICT OF COLUMBIA BAR ONLY;
PRACTICE LIMITED TO FEDERAL COURTS AND AGENCIES

TELEPHONE: 888-322-5291
202-293-2300

TELECOPIER: 410-626-1794
E-MAIL: dkellyfclaw1@comcast.net

January 5, 2015

Honorable Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Accepted/Files

JAN - 5 2015
Federal Communications Commission
Office of the Secretary

Attention: Peter H. Doyle, Esquire
Chief, Audio Division, Media Bureau

RE: **CatolicaSpringfield.com**
NEW LPFM CP, Springfield, Massachusetts
FCC Facility ID # 192782
File No. BNPL-20131115ACJ
Request for Tolling

Dear Madame Secretary:

On behalf of our client CatolicaSpringfield.com (CSC), permittee of a new Low Power FM Broadcast Station on 102.5 MHz at Springfield, Massachusetts, pursuant to Section 73.3598(b)(2) of the Commission's Rules, this is to request tolling of the expiration date of said construction permit until all appeal rights of Media Preservation Foundation (MPF) have been exhausted.

On November 6, 2014, the Audio Division granted CSC's application at Springfield, File No. BNPL-20131115ACJ.

On December 5, 2014, MPF timely filed a "Petition for Reconsideration" of said action. CSC filed an Opposition to said petition on December 18, 2014; on December 29, 2014, MPF filed a Reply pleading.

Section 73.3598(b)(2) states:

(b) The period of construction for an original construction permit shall toll when construction is prevented by the following causes not under the control of the permittee:

* * * * *

(2) The grant of the permit is the subject of administrative or judicial review (i.e., petitions for reconsideration and applications for review of the grant of a construction permit pending before the Commission and any judicial appeal of any Commission action thereon), or construction is delayed by any cause of action pending before any court of competent jurisdiction relating to any necessary local, state or federal requirement for the construction or operation of the station, including any zoning or environmental requirement; * * * * *

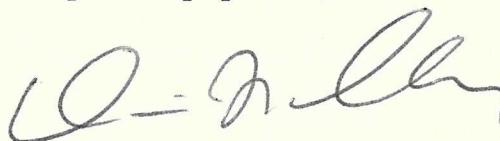
Documentation from the FCC's CDBS database showing MPF's filing of a "Petition for Reconsideration" on December 5, 2014 is attached.

In accordance with Section 73.3598(c) of the Rules, we are filing this request in triplicate with the Secretary's office within 30 days of the event which triggered the tolling—the December 5, 2014 filing of the "Petition for Reconsideration". We would note that the 30th day was Sunday, January 4, 2015, when the FCC's Secretary's Office was closed. This letter is filed on the first business day subsequent to Sunday, January 4, 2015, and is therefore timely filed pursuant to Section 1.4(j) of the Rules.

We would request that CSC's eighteen month construction period be deemed to commence on the date that the denial of MPF's last petition or appeal becomes a final order.

Should additional information be desired in connection with the above matter, kindly communicate with this office.

Very truly yours,



Dennis J. Kelly



Legal Action Information

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Legal Action Information

File Number: BNPL-20131115ACJ

Legal Comments

Comments: (none)

Legal Actions

Filed Date: 12/05/2014 **Action Id:** 40323 **Parent Id:** application

Type: [Petition for Reconsideration](#)

Status: Filed

Status Date: 12/05/2014

Submitted By: MEDIA PRESERVATION FOUNDATION

Company:

Comment: (none)

Filed Date: 12/18/2014 **Action Id:** 40367 **Parent Id:** 40323

Type: [Opposition](#)

Status: Filed

Status Date: 12/18/2014

Submitted By: CATOLICASPRINGFIELD.COM

Company:

Comment: (none)

Filed Date: 12/29/2014 **Action Id:** 40394 **Parent Id:** 40323

Type: [Reply](#)

Status: Filed

Status Date: 12/29/2014

Submitted By: MEDIA PRESERVATION FOUNDATION

Company:

Comment: (none)