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Accepted/Files

March 16, 2016

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Federal Communications Commission
Office of the Secretary

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: FM Translator K284BT, Mount Pleasant, IA, Facility No. 142445
Construction Permit File No. BNPFT-20130328AGK
Request for Extension/Tolling of Construction Permit**

Dear Ms. Dortch:

Starboard Media Foundation, Inc. ("Starboard"), by its attorney and pursuant to Sections 1.3 and 73.3598 of the Commission's Rules, hereby respectfully requests tolling or extension of the authorized period of construction for the construction permit associated with FM translator station K284BT, Mount Pleasant, Iowa (Facility No. 142445) (the "Construction Permit"). This request is being filed in accordance with Footnote 36 of *Revitalization of the AM Service*, First Report and Order, Further Notice of Proposed Rulemaking and Notice of Inquiry, 30 FCC Rcd 12145 (2015) ("Order") and the Commission's Public Notice, *Media Bureau Initiates AM Revitalization Outreach Efforts*, DA 15-1215, released October 26, 2015 ("October 2015 Public Notice"). Starboard seeks a waiver or tolling of the construction deadline to the longest period permitted by the Commission.

The Construction Permit is due to expire on May 2, 2016. As set forth in the Order and in the Commission's Public Notice, *Media Bureau Announces Filing Dates and Procedures for AM Filing Window for FM Translator Modifications*, DA 15-1491, released December 23, 2015 ("December 2015 Public Notice"), the first FM translator modification application window, which opened on January 29, 2016 and is due to close on July 28, 2016, is open only to licensees of Class C and Class D AM stations. The second application window, which is scheduled to open on July 29, 2016 and close on October 31, 2016, is open to licensees of all AM stations, including Class A and Class B AM stations.

Starboard is the licensee of several Class B AM stations. Starboard has plans to file an application during the second translator modification application window for consent to modify the Construction Permit, including by moving its transmitter site up to 250 miles from its presently-authorized location, and to pair it with one of its Class B AM stations. However,

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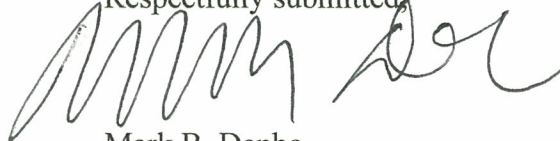
because the Construction Permit is due to expire on May 2, 2016, tolling or extension of that deadline may be necessary so that Starboard may take advantage of the AM revitalization efforts set forth in the Order without enduring significant additional expenses. In particular, absent tolling or extension of the Construction Permit deadline, if Starboard wanted to pair one of its Class B AM stations with an FM translator, Starboard likely would have to either: (a) build out the presently-authorized facilities set forth in the Construction Permit by May 2, even though it would likely be moving those facilities up to 250 miles away just a few months later; or (b) allow the Construction Permit to expire and then seek to acquire a new one from a third party, which could require Starboard to spend \$50,000 or more, including transaction costs.

Starboard is a not-for-profit corporation that operates its stations with noncommercial Roman Catholic religious programming and relies on listener donations to pay its operating expenses. It would be a waste of Starboard's precious resources to require Starboard, if it wanted to take advantage of the options available to AM licensees set forth in the Order, to proceed under (a) or (b) above simply because the Construction Permit had the misfortune of being granted in May 2013, rather than sometime later that year. (If the Commission had granted the Construction Permit in, for example, August 2013, and Starboard filed an application during the second window to modify the Construction Permit, then the Construction Permit would have been automatically eligible for extension or tolling, in keeping with Footnote 36 of the Order.) If the Commission grants this request, the savings that would accrue to Starboard could be used on other matters that would have a greater positive impact on its listeners, such as the provision of additional programming and maintenance and enhancements to its radio station operations in various markets in the East and Midwest.

Consistent with the requirements for extension or tolling as set forth in the Order and the October 2015 Public Notice, Starboard commits to construct and initiate broadcast service on the facility set forth in the Construction Permit, as it will be modified during the second application window, as soon as possible following a grant of such modification.

For the forgoing reasons, Starboard respectfully submits that it would be in the public interest to grant the tolling or extension of the expiration of the Construction Permit.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark B. Denbo', is written over the typed name.

Mark B. Denbo

Counsel to Starboard Media Foundation, Inc.

cc: Victoria McCauley, Esq. (FCC) (victoria.mccauley@fcc.gov)