



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000

www.wileyrein.com

ORIGINAL

2016 JUL 21 A 10:45

July 19, 2016

Accepted / Filed

Gregory L. Masters
202.719.7370
gmasters@wileyrein.com

JUL 19 2016

Federal Communications Commission
Office of the Secretary

BY HAND

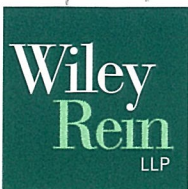
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW, Room TW-A325
Washington, DC 20554

Re: Request for Waiver of 47 C.F.R. § 73.3598
W252CQ, Atlanta, IL (Facility ID #138424)

Dear Ms. Dortch:

On behalf of Emmis Radio License, LLC (“Emmis”), the proposed assignee of FM translator station W252CQ, Atlanta, Illinois, this is to request a waiver of the October 24, 2016 construction deadline for the W252CQ construction permit (File No. BNPFT-20130328AHF) pursuant to 47 C.F.R. § 1.3 and in accordance with footnote 36 of the *First Report and Order, Further Notice of Proposed Rule Making and Notice of Inquiry* in MB Docket No. 13-249, *Revitalization of the AM Radio Service*, 30 FCC Rcd 12145 (2015) (the “AM Revitalization Order”). Footnote 36 states that waivers of the Auction 83 FM translator construction deadlines are “presumptively in the public interest for applicants participating in one of the modification windows, provided that the AM station licensee proposing to use the FM translator for rebroadcasting its AM station commits to prompt FM translator station construction and initiation of broadcast operations.”

Cornerstone Community Radio, Inc. (“Cornerstone”) is the holder of the above-referenced construction permit. An application is pending for consent to the assignment of the construction permit from Cornerstone to Emmis (File No. BAPFT-20160715AAJ). Cornerstone separately filed a 250-mile window application (File No. BMPFT-20160714ACK, the “Window Application”) to relocate W252CQ in order to rebroadcast AM station WQQX, East St. Louis, Illinois (Facility ID #72815). Cornerstone has a rebroadcast consent agreement with the licensee of WQQX, and Emmis has likewise received consent to rebroadcast WQQX upon its purchase of W252CQ. In the attached certification, Emmis commits to promptly constructing and initiating operation of the translator once Emmis acquires the translator and the Window Application is granted so that WQQX can be rebroadcast as contemplated in the AM Revitalization Order.



Marlene H. Dortch, Secretary

July 19, 2016

Page 2

Accordingly, Emmis respectfully requests a waiver of 47 C.F.R. § 73.3598 to toll the construction deadline of the permit for W252CQ until six months after the later of consummation of the above-referenced assignment and grant of the Window Application.

Should there be any questions concerning this matter, please contact the undersigned.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Gregory L. Masters", written over a horizontal line.

Gregory L. Masters

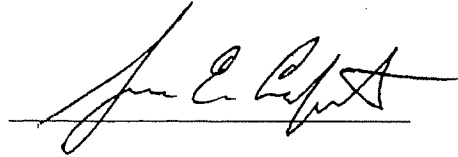
cc (via e-mail): Victoria McCauley, Audio Division, Media Bureau

CERTIFICATION

Emmis Radio License, LLC, the proposed assignee of the construction permit for FM translator station W252CQ, Atlanta, Illinois, hereby commits to prompt construction and initiation of operation of the facilities applied for in FCC File No. BMPFT-20160714ACK, in order to rebroadcast AM station WQQX, East St. Louis, Illinois as contemplated in the AM Revitalization Order, once Emmis Radio License, LLC is approved as the permittee, the assignment of the construction permit is consummated, and the requested modification of the construction permit is approved.

EMMIS RADIO LICENSE, LLC

By: _____



Dated: _____

7/19/16