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November 24, 2017

Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: KFFL-LP Pasadena, CA Fac ID 19557

- (1) Construction Permit Extension Request for Low Power FM
- (2) Request for Tolling

Dear FCC:

Razorcake was granted a construction permit for a new LPFM 06/30/2016. It was subject to a Petition to Deny, Application for Review, and Petition for Reconsideration for which during that time it could not construct. Finally 08/16/2017 this matter was resolved. Unfortunately 11/16/2017 a submitted minor modification of construction permit was yet frivolously contested by the same party again with an Informal Objection. This letter is to formally request two things:

- (A) An 18 month extension of CP which is available to all LPFM permittees within good cause for the reason explained above. It is respectfully being requested here.
- (B) Pursuant to Section 73.398 of the Commission's rules, we respectfully requesting that the construction period for BNPL-20131114AXZ with pending minor modification BMPL-20171030AFC issued to Razorcake be tolled effective as of November 13, 2017 until the legal challenge for the minor modification is resolved. On that date, Multicultural Radio Broadcasting Licensee, LLC and subsequently Educational Media Foundation (both "Parties") filed Objections. Razorcake timely filed an Opposition on November 21, 2017. Those pleadings are currently pending before the Commission. Section 73.3598(b)(2) provides that the period of construction for an original construction permit shall toll when construction is prevented because the "grant of the permit is the subject of an administrative or judicial review." The pendency of the Objections filed by Parties constitute good cause for the tolling of the construction period.

Thank you.

Sincerely,

Todd Urick

Broadcast Representative for Razorcake