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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

Accepted / Filed

DEC -8 2018

Federal Communications Commission  
Office of the Secretary

In the Matter of	)	
	)	
KUDL(FM), Sacramento, CA	)	Facility ID No. 57889
	)	File No. BRH-20050728ATP
	)	File No. BRFT-20130730ANC
	)	
KRXQ(FM), Sacramento, CA	)	Facility ID No. 20354
	)	File No. BRH-20050728AUQ
	)	File No. BRH-20130730AN1
	)	
KSEG(FM), Sacramento, CA	)	Facility ID No. 11281
	)	File No. BRH-20050728ATX
	)	File No. BRH-20130730ANK
	)	
KKDO(FM), Fair Oaks, CA	)	Facility ID No. 57889
	)	File No. BRH-20130730ANC
	)	
KIFM(AM), Sacramento, CA	)	Facility ID No. 67848
	)	File No. BR-20130730ANG

**OPPOSITION OF ENTERCOM COMMUNICATIONS CORP.  
TO PETITION FOR FURTHER RECONSIDERATION**

Entercom Communications Corp. ("Entercom") hereby opposes the Second Reconsideration Petition filed in this proceeding by Edward R. Stolz II ("Stolz").<sup>1</sup>

The Commission should dismiss the Second Reconsideration Petition because, as it has repeatedly held, Stolz lacks standing to participate.<sup>2</sup> To the extent the Commission reaches the merits, it should deny the Second Reconsideration Petition. As the Commission has made clear, Entercom meets the renewal standard of 47 U.S.C. § 309(k).<sup>3</sup>

<sup>1</sup> Petition for Further Reconsideration of Edward R. Stolz II (Nov. 26, 2018) ("Second Reconsideration Petition").

<sup>2</sup> See, e.g., *Entercom Sacramento License, LLC*, FCC 18-151, ¶ 3 (rel. Oct. 25, 2018); *Entercom Sacramento License, LLC*, 32 FCC Rcd 6615, 6617-18 ¶¶ 6-9 (2018) ("*Entercom MO&O*").

<sup>3</sup> See, e.g., *Entercom MO&O*, 32 FCC Rcd at 6618-19 ¶ 10.

Lastly, we note that Stolz has now filed four challenges to the Media Bureau's 2017 order granting the renewal applications – a petition for reconsideration to the Media Bureau, an application for review to the Commission, and two petitions for reconsideration of the denial of his application for review. In the interest of finality, the Commission may want to consider appropriate steps to bring this proceeding to a conclusion.<sup>4</sup>

Accordingly, the Commission should promptly dismiss and/or deny the Second Reconsideration Petition.

Respectfully submitted,

**ENTERCOM COMMUNICATIONS CORP.**

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<sup>4</sup> For example, to the extent the Commission finds these challenges to be repetitive, Entercom requests that the Commission make it clear that any future reconsideration petitions on this matter will be summarily dismissed, which will not only bring finality, but also preserve Commission resources. *Cf. Daytona Beach Broadcasting Association*, FCC 18-169, ¶ 5 (rel. Nov. 28, 2018) (“we hereby direct the staff to dismiss summarily by public notice . . . any subsequent pleadings filed” by the applicant).

**CERTIFICATE OF SERVICE**

I, Luciana Jhon, do hereby certify that, on this 6th day of December, 2018, the foregoing Opposition of Entercom Communications Corp. to Petition for Further Reconsideration was served by first class mail, postage prepaid, on the following persons:

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