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April 12, 2013

**VIA OVERNIGHT DELIVERY**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

Attention: MDCL Waivers  
Audio Division  
Media Bureau

**Re: WBAL(AM), Baltimore, Maryland  
Request for MDCL Waiver**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice in DA 11-1535 (September 13, 2011), this letter shall serve as a request by Hearst Stations Inc. ("Hearst"), licensee of AM Radio Station WBAL(AM), Baltimore, Maryland, for a waiver of Section 73.1560(a) of the Commission's Rules to permit operation with Modulation Dependent Carrier Level ("MDCL") technology.

As described in DA 11-1535, use of MDCL technology involves operation with transmitter power levels below 90 percent of a station's nominal licensed power and, therefore, such reduced power operation would be in variance with Section 73.1560(a) of the Commission's rules.

On November 20, 2012, the Audio Division granted experimental authority in File No. 20121113AOQ to permit WBAL(AM) to evaluate MDCL technology. In connection with the experimental authority, Hearst favorably tested and compared two MDCL algorithms—Adaptive Carrier Control ("ACC Plus") and Amplitude Modulation Comping ("AMC Plus"). Based on this testing, Hearst concluded that AMC Plus provides the greatest power savings without materially impacting WBAL(AM)'s audio quality.

Accordingly, Hearst wishes to permanently operate with AMC Plus MDCL technology, and therefore, Hearst hereby respectfully requests a waiver of Section 73.1560(a) for continued use of such technology and modification of WBAL(AM)'s license accordingly. Because grant

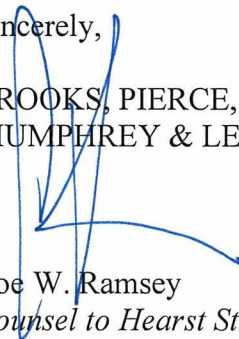
Ms. Marlene H. Dortch  
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of the instant waiver request would facilitate WBAL(AM)'s efficient operation with substantial energy savings, grant of the instant request would be in the public interest.

If any questions should arise during the course of your consideration of this request, it is respectfully requested that you communicate with this office.

Sincerely,

BROOKS, PIERCE, McLENDON,  
HUMPHREY & LEONARD, L.L.P.



Coe W. Ramsey  
*Counsel to Hearst Stations Inc.*

cc: Susan Crawford (via e-mail)  
Ann Gallagher (via e-mail)

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ANTI-DRUG ABUSE ACT CERTIFICATION

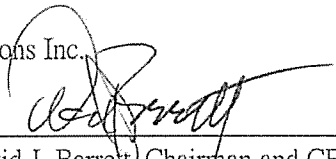
By checking "Yes", the applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits pursuant to that section. For the definition of a "party" for these purposes, refer to 47 C.F.R. §1.2002(b).

☒ Yes

☐ No

Hearst Stations Inc.

By:

  
David J. Barrett, Chairman and CEO

Date: April 10, 2013