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2826.036

December 15, 2015

Via Hand Delivery

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Accepted / Filed**

**DEC 15 2015**

**Federal Communications Commission  
Office of the Secretary**

Re: W279CD, Ashland, WI  
Facility Id. 138668  
Construction Permit File No. BNPFT-20130319ADD  
FRN: 0006005672

**Request for Waiver of Construction Permit Deadline**

Dear Ms. Dortch:

This Request for Waiver of Construction Permit Deadline is filed on behalf of the University of Northwestern-St. Paul (UNWSP) pursuant to 47 C.F.R. §1.3 of the Commission's rules, in accordance with footnote 36 of the FCC's AM Revitalization First Report & Order released October 23, 2015 (*1<sup>st</sup> R&O*) and the Modification Window Procedures Public Notice released October 26, 2015 (Notice).

UNWSP holds a construction permit for FM Translator W279CD, Ashland, WI, Fac. Id. 138668 (BNPFT-20130319ADD) (Permit) that will expire on April 22, 2016. UNWSP intends to file an application to modify the W279CD permit for use with one of its currently owned AM Stations<sup>1</sup> in the first of two 2016 modification windows announced by the *1<sup>st</sup> R&O* and scheduled to begin in the first quarter of 2016. FCC action on the planned modification application is not likely to occur until after the permit expires. UNWSP therefore requests a temporary waiver of the April 22, 2016 Permit deadline to enable it to realize service improvements for its AM station quickly, and avoid the unnecessary expense of building out and licensing the permitted facilities before the permit can be modified in the 2016 window.

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<sup>1</sup> Because the modification filing windows are processed on a first-come, first-served basis, and there may be limited vacant FM channels in some markets, UNWSP has not identified which of its five (5) AM stations will utilize the modified translator. The AM station will be disclosed in the filed modification application. If necessary, UNWSP will make that information available now to FCC staff upon request.

Upon grant of a modified permit in the 2016 filing window, UNWSP commits to prompt station construction and initiation of broadcast operations, thereby satisfying the 1<sup>st</sup> R&O's requirement for this waiver request to be granted as presumptively in the public interest. A grant of this waiver request is also in the public interest because it will allow UNWSP to realize AM service improvements quickly and furthers the FCC's effort to expand cross-service opportunities for AM stations.

Please do not hesitate to contact the undersigned with any questions or requests for additional information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph C. Chautin, III". The signature is fluid and cursive, with a prominent initial "J" and a long, sweeping underline.

Joseph C. Chautin, III  
*Counsel for University of Northwestern-St. Paul*

cc: Victoria McCauley