

AUG 22 2016

August 17, 2016

FCC Mail Room

2016 AUG 23 A 10:18

ADMINISTRATIVE DIVISION

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

Re: Request For Waiver of 47 C.F.R. Section 73.3598
FM Translator W247CB, Fac. ID #140627, Pittsfield, MA

Dear Ms. Dortch:

On behalf of Marshfield Broadcasting Co., Inc., ("Marshfield"), proposed assignee of FM Translator W247CB, Pittsfield, Massachusetts pursuant to BAPFT-20160729ACU, I here respectfully request a waiver (47 C.F.R. §1.3 and §73.3598) of the construction deadline for the W247CB construction permit pursuant to Note 36 in the *First Report and Order, Further Notice of Proposed Rulemaking and Notice Of Inquiry* in MB Docket No.13-249, *Revitalization of the AM Radio Service*, 30 FCC Rcd 12145 (2015).

Note 3 states that " Modification applicants in one of these two modification windows may seek waivers of these construction deadlines..." Further, the Note states that waivers of the Auction 83 translator permit 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."

W247CB's permit was granted as a result of the Auction 83 window filing (see BNPFT-20030312AUZ and BNPFT-20130822AEX) and the permit is set to expire December 13, 2016. This permit is being sold to Marshfield and an application is pending for consent to assign the permit to Marshfield (BAPFT-20160729ACU). Marshfield has also filed a 250 mile window applications to relocate W247CB in order to broadcast Marshfield's AM station, WATD(AM), Brockton, Massachusetts (BPFT-20160729ALA) .

In the attached certification , Marshfield commits to promptly constructing and initiating operation of the translator once the pending assignment application and proposed 250 mile window relocation application is granted so that WATD can be rebroadcast as contemplated in the AM Revitalization Order.

Therefore, Marshfield respectfully requests waivers of 47 CFR §1.3 and §73.3598 to toll the construction deadline of the construction permit for W247CB until six months after processing of the above-referenced assignment application and modification applications are complete.

Should any questions arise with respect to this matter, please contact the undersigned counsel.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Allan G. Moskowitz', with a long horizontal flourish extending to the right.

Allan G. Moskowitz, Esq.

Cc: (via e-mail) Victory McCauley, Audio Division, Media Bureau

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CERTIFICATION

Marshfield Broadcasting Co., Inc., the proposed assignee of FM Translator stations W247CB, Pittsfield, Massachusetts, hereby commits to prompt construction and initiation of operation of the facilities applied for in BPFT- 20160729ALA in order to rebroadcast WATD(AM), Brockton, Massachusetts once the modification application is granted and Marshfield Broadcasting Co., Inc. is approved as the permittee of the FM translator.

MARSHFIELD BROADCASTING CO., INC>

By: 
Edward Perry
President