

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Accepted / Filed

AUG 20 2018

Federal Communications Commission
Office of the Secretary

In re the Application of:)
)
Cumulus Licensing LLC) File No. BSTA-20180810ABA
For Engineering Special Temporary Authority)
For FM Translator W255CJ, Atlanta, Georgia)
Facility ID No. 148550)

REQUEST OF DICKEY BROADCASTING COMPANY

Dickey Broadcasting Company (“DBC”), the licensee of FM translator station W229AG, Atlanta, Georgia, Facility ID No. 88937 (“W229AG”), by its attorneys, requests that the Commission withhold processing of the above-captioned Application of Cumulus Licensing LLC (“Cumulus”), for special temporary authority (“STA”) for FM translator W255CJ, Atlanta, Georgia (“W255CJ”), for the reasons described below.¹

W229AG transmits from an antenna system that it shares with three other FM stations, one of which is W255CJ. Thursday afternoon, August 16, 2018, the undersigned legal counsel to DBC was informed by counsel to WKNG, LLC, the licensee of WWGA(FM), Tallapoosa, Georgia, of the existence of the Application for STA for W255CJ. Up until that communication on August 16, 2018, DBC had no knowledge of the Application.

After prompt consultation with its engineers, DBC was concerned that the proposal in the Application to reduce the signal of W255CJ also would reduce the coverage provided by W229AG because of the shared antenna system. DBC’s counsel contacted Cumulus’ contact representative for the Application on Friday afternoon, August 17, 2018, and raised DBC’s

¹ W229AG retransmits the signal of WCNN(AM), North Atlanta, Georgia (FCC ID No. 56389) for which DBC also is the licensee. DBC is the licensee of two other AM radio stations and FM translators serving the Atlanta area.

concern about the Application, asking for assurances that the operations of W229AG would not be affected by the proposed change in the operations of W255CJ. Cumulus's contact representative offered to have such assurances provided to DBC by the Cumulus engineers.

As of this writing, DBC has not been provided with such assurances from Cumulus. DBC understands that only one business day has passed since it brought its concerns to the attention of Cumulus. DBC has no desire to impede Cumulus' plans for W255CJ, so long as there would be no effect on W229AG.

Therefore, DBC respectfully requests that the Commission withhold processing of the Application, and not grant the STA, until DBC has been provided a reasonable opportunity to receive and study any assurances from Cumulus that the proposed STA, if effectuated, would be harmless to W229AG.

Respectfully submitted,

DICKEY BROADCASTING COMPANY

/s/
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August 20, 2018

Its Attorneys

CERTIFICATE OF SERVICE

I, Marie Coby, a legal secretary with the firm of Holland & Knight LLP, hereby certify that on August 20, 2018, a copy of the foregoing "Request of Dickey Broadcasting Company" was deposited in the U.S. mail, postage prepaid, to the following:

Andrew S. Kersting
Cumulus Licensing LLC
3280 Peachtree Road, NW
Suite 2200
Atlanta, Georgia 30305

In addition, a copy of the foregoing "Request of Dickey Broadcasting Company" was distributed by e-mail, as follows:

Andy.Kersting@cumulus.com
James.Bradshaw@fcc.gov
Robert.Gates@fcc.gov
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Marie Coby

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