

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC

21 February 2020

Applications of	)
	)
AMFM RADIO LICENSES, L.L.C.	) FRN 0001800689
For Translator Station Renewals	)
	)
W283AB, Florence, SC	) FCC File No. 0000095213
Facility ID 3116	) as amended in File No. 0000105966
	)
W290CD, Darlington, SC	) FCC File No. 0000095218
Facility ID 3117	)
	)
W250BJ, Florence, SC	) FCC File No. 0000096166
Facility ID 158024	) as amended in File No. 0000099561

To: Marlene H. Dortch, Secretary  
Federal Communications Commission  
Attn: Media Bureau, Audio Division

**OPPOSITION TO MOTION TO DISMISS**

Triangle Access Broadcasting, Inc. (“Triangle”) hereby opposes AMFM Radio Licenses, L.L.C. (“AMFM”) Motion to Dismiss,<sup>1</sup> filed on February 19, 2020, to dismiss Triangle's January 16, 2020, Informal Objection (“Objection”)<sup>2</sup> against the subject FM translators. AMFM requests dismissal because on January 20, 2020, AMFM Radio Licenses, L.L.C. (“AMFM”) changed the primary station of W283AB and on February 12, 2020, the Bureau granted special temporary authority to reduce the coverage area of W250BJ and thus its overlap with W290CD.<sup>3</sup>

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1 Pleading file nos. 0000106266, 0000106268, 0000106269.  
2 Pleading file nos. 0000097926, 0000097929, 0000097932.  
3 BSTA-20200211AAA

AMFM has sufficiently addressed Triangle's Section 74.1232(b)<sup>4</sup> concern, and Triangle no longer objects to a prompt renewal of W283AB and is no longer concerned that W290CD and W250BJ overlap less than 50 percent. However, AMFM has not addressed Triangle's concern over using multiple cross-service translators, branded as "The Rock FMs," in a market where the licensee already owns the local ownership limit of FM stations.<sup>5</sup>

Because AMFM has not addressed all of Triangle's objections, the Motion to Dismiss should be granted with respect to W283AB only. The Objection should stand against W290CD and W250BJ, and only one of those translators should be renewed.

Respectfully Submitted,



Steven L. White

Director; *Triangle Access Broadcasting, Inc.*

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<sup>4</sup> 47 C.F.R. § 74.1232 ("Section 74.1232").

<sup>5</sup> Objection, at 2-3.

## Certificate of Service

I, Steven L. White, certify that a true and correct copy of the foregoing Opposition to Motion to Dismiss was sent, this 21st day of February, 2020, by first-class, postage paid mail to the following:

FCC Contact (Licensee/Applicant)  
AMFM Radio Licenses, L.L.C.  
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By:



Steven L. White