

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In Application of)
)
)
Central Baptist Theological)
Seminary of Minneapolis) File no. 0000142489
) Fac. no. 202408
For Minor Change to)
FM Translator Station)
K250BY, Plymouth, MN)
)

To: Office of the Secretary
Attn: Audio Division, Media Bureau

May 5, 2021

INFORMAL OBJECTION

Park Public Radio, Inc (PPR) hereby seeks dismissal or denial of the above referenced application for minor change in the license of FM Translator station K250BY (the “CTS Application”) filed by Central Baptist Theological Seminary of Minneapolis (CTS). The CTS Application, if granted, would cause impermissible interference to a pending cutoff application for minor change in the license of LPFM Station KPPS-LP (the “PPR Application”). This informal objection is timely filed within 30 days of the public notice of the CTS Application’s acceptance for filing¹.

The PPR Application was tendered in the Commission’s License Management System (LMS) database on March 31, 2021. The PPR Application was Accepted for Filing and placed on Public Notice on April 2, 2021². The CTS Application was tendered in the Commission’s LMS database on April 1, 2021. The CTS Application was Accepted for Filing and placed on Public Notice on April 5,

¹ Although the 30 day deadline for filing Petitions to Deny do not apply to Informal Objections, this Objection is filed within this timeframe out of courtesy to all parties

² <https://docs.fcc.gov/public/attachments/DOC-371301A1.pdf>

2021³. The PPR Application and CTS Application cannot be simultaneously granted as they would cause impermissible interference to one another.

It is the Commission's policy to treat applications for minor change in licensed facilities on a first come / first served standpoint⁴. When one applicant files a minor change application, this applicant enjoys cutoff protection against subsequently filed applications. Conflicting applications that are subsequently filed are placed in a queue and only granted if the lead applicant is dismissed. These policies are laid out in the sections referenced in footnote 3.

The CTS Application was filed one day after the PPR Application but does not protect the earlier filed PPR Application which has received cutoff protection from the subsequently filed CTS Application. Because the CTS Application was filed subsequent to the PPR Application, and does not protect the cutoff PPR Application, the CTS Application must be dismissed upon grant of the PPR Application. The PPR Application should therefore be granted and the CTS Application dismissed for failure to protect the PPR Application.

Respectfully Submitted,

/s/

Jeffrey Sibert
President
Park Public Radio, Inc.
3340 Utah Ave S
St. Louis Park, MN 55426
612-791-2806
jeff@parkpublicradio.org

³ <https://docs.fcc.gov/public/attachments/DOC-371332A1.pdf>

⁴ Processing policies are found within Section 73.870, 73.3564, 73.3573, and 74.1233 depending on service. LPFM Processing policies are found within 73.870 and FM Translator within 74.1233.

Certification and Service

I, Jeffrey Sibert, hereby certify under penalty of perjury that the statements made in this document are accurate to the best of my knowledge and I comply with the requirements outlined in Section 1.52.

I certify that simultaneously with the filing of this Informal Objection through LMS I will send a copy of this Informal Objection to the Attorney for Central Baptist Theological Seminary of Minneapolis, Mr. Gregg Skall, via first class mail. An electronic copy is also being sent to Mr. Skall via email.