

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
BROADCAST SCIENCES LLC)	File No. BLFT-20170106ACP
)	Facility ID No. 142298
FM Translator Station W221DG)	
Exton, PA)	

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

Request for Extension of Time

Clear Communications, Inc. (“Clear”), licensee of full-power radio station WVLT(FM), Channel 221A, Vineland, New Jersey, by its attorney, hereby files this Request for Extension of Time in which to respond to the Commission’s letter to undersigned counsel dated August 20, 2019 (the “Letter”) until October 18, 2019, in connection with Clear’s complaint about the interference that would be caused by operation of facilities pursuant to the above-captioned application. In support of this request, the following is submitted.

Clear’s interference complaint was initially filed January 23, 2017. After Broadcast Sciences LLC (the “Applicant”) filed the above-captioned license application, the Applicant filed a modification in BPFT-20170718AEV (the “July 2017 Modification”). Clear objected to the July 2017 Modification as well. On August 9, 2019, the Commission granted Clear’s informal objection and dismissed the July 2017 Modification.

The Letter sent August 20, 2019, gave Clear thirty days to supply documentation to supplement its earlier-filed complaint of interference against the above-captioned translator per the initial license application filed in January 2017. The Letter was sent to undersigned counsel while she was on vacation out of the country. She did not return to the office until August 23,

2019. Because of the August 9, 2019 letter granting Clear's objection and dismissing the 2017 Modification Application, it was initially presumed that the Letter dated August 20, 2019, was sent in error, which was confirmed informally by Commission staff. Upon further probing by undersigned counsel, it was subsequently confirmed by Commission staff that the Letter, in fact, had *not* been sent in error since the Letter related to the earlier-filed above-captioned license application and not the July 2017 Modification. In that process, nearly two weeks of the thirty-day response time has been lost. Given the amount of work that needs to be done to supplement the initial complaint, the press of other commitments and travel schedules, and the loss of precious time through a misunderstanding of the legitimacy of the Letter, it is difficult to respond in the period remaining.

Clear intends to supplement its pending interference complaint by providing the information requested in the Letter pursuant to the new rules.¹ An extension until October 18, 2019, is requested for that purpose. A grant of the requested extra time will permit the preparation of the response to the Letter that will assist the Commission and all parties in being able to address fully the issues in a more efficient manner. The additional time to prepare the response will reduce the risk that Clear will need to prepare supplements in multiple filings, which might happen if the full amount of requested time is not allowed. The passage of time since Clear filed its initial complaint and the need to re-engage with those complaining listeners from January 2017 under the new interference standards, along with the fact that the translator is not currently operating,² may make following up with those complaining listeners that much

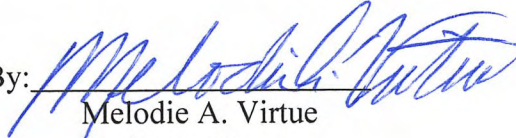
¹ See *Amendment of Part 74 of the Commission's Rules Regarding FM Translator Interference*, FCC 19-40, (released May 9, 2019) ("Translator Interference Order").

² Applicant informed the Commission on April 4, 2017 that it had suspended operations but has not withdrawn the above-captioned license application. See http://licensing.fcc.gov/cgi-bin/prod/cdb/forms/prod/getimportletter_exh.cgi?import_letter_id=88557.

more time consuming. Counsel for Broadcast Sciences has been notified of this request. An extension until October 18, 2019, is therefore respectfully requested.

Respectfully submitted,

CLEAR COMMUNICATIONS, INC.

By: 
Melodie A. Virtue
Its Attorney

Garvey Schubert Barer, P.C.
1000 Potomac Street, NW
Suite 200
Washington, DC 20007
Tel: 202-965-7880
mvirtue@gsblaw.com

September 11, 2019

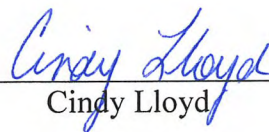
CERTIFICATE OF SERVICE

The undersigned, an employee of Garvey Schubert Barer, hereby certifies that a copy of the foregoing "Request for Extension of Time" was served this date, by U.S. Postal Service First Class mail, postage prepaid, upon the following:

James D. Bradshaw, Senior Deputy Chief*
Media Bureau, Audio Division
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554
James.Bradshaw@fcc.gov

Robert Gates*
Media Bureau, Audio Division
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554
Robert.Gates@fcc.gov

Peter Tannenwald, Esq.**
Fletcher, Heald & Hildreth, PLC
1300 North 17th Street, 11th Floor
Arlington, VA 22209-3801
tannenwald@fhhlaw.com
Counsel for Broadcast Sciences LLC


Cindy Lloyd

Dated: September 11, 2019

*Via email only

** Via email and first class mail