Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

December 11, 2013

Re: Notice of *Ex Parte* Presentation
MM Docket No. 99-25 – Creation of a Low Power Radio Service
MB Docket No. 13-249 – Revitalization of the AM Radio Service

Dear Ms. Dortch:

On Monday, December 9, 2013, Sanjay Jolly of the Prometheus Radio Project met with Peter Doyle of the Media Bureau's Audio Division and Adonis Hoffman of Commissioner Clyburn's office, and later met separately with Clint Odom of Commissioner Rosenworcel's office.

In both meetings, Mr. Jolly commended the Audio Division for the expedient pace at which its staff has reviewed applications from the low power FM (LPFM) window that closed November 15, 2013. According to the Media Bureau public notice released on December 3, the Bureau will begin to issue new station construction permits to singleton applicants in January 2014 and will release the list of mutually exclusive applicants later this month.

Mr. Jolly noted that limited signal coverage remains a significant threat to the success of the LPFM service. In a 2012 survey of LPFM stations conducted by Prometheus, roughly a quarter of respondents listed limited signal coverage as a major threat to their station's viability. Mr. Jolly argued that raising LPFM's maximum effective radiated power from 100 Watts to 250 Watts and holding an FM translator window exclusively for LPFM licensees would significantly unburden LPFM stations while remaining faithful to the word and intention of the Local Community Radio Act.

With respect to the Commission's proposal for an FM translator filing window exclusively for AM stations, Mr. Jolly urged the Commission to delay any such window until all LPFM applications have been resolved. In addition, he expressed support for AM broadcasters – particularly women, minority, and single-station owners – and argued that eligibility for the AM-only translator filing window be restricted to Class C and D stations only.

Respectfully Submitted,
/s/
Sanjay Jolly
Prometheus Radio Project

cc: Peter Doyle, Adonis Hoffman, Clint Odom