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August 11, 2017

VIA IBFS

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Audacy Corporation, Minor Amendment to IBFS File No. SAT-LOA-20161115-00117 (Call Sign S2982)

Dear Ms. Dortch,

Pursuant to Section 25.116 of the Federal Communications Commission's Rules.¹ Audacy Corporation ("Audacy") herein requests the following minor amendments to the above-referenced application for a non-geostationary ("NGSO") satellite system:²

Schedule S Correction. With respect to the *Operating Frequency Bands* section, the Fixed-Satellite Service band with the current range 27500.0 MHz - 30000.0 MHz should be corrected to 29500.0 MHz - 30000.0 MHz. The correct frequency range is reflected elsewhere in Audacy's Schedule S (receiving beams GRL0 and GRR0), and in its Narrative Exhibit.³

Removal of 23.18-23.38 GHz. Iridium Constellation, LLC ("Iridium") has authority to operate inter-satellite links in the 23.18 - 23.38 GHz frequency band. In its Opposition and Response, Audacy committed to amend its pending application to remove proposed use of this frequency range in order to alleviate interference concerns raised by Iridium.⁴ To satisfy this obligation, Audacy requests the deletion

¹ 47 C.F.R. § 25.116.

² See Audacy Corporation Application for Authority to Launch and Operate a Non-Geostationary Medium Earth Orbit Satellite System in the Fixed- and Inter-Satellite Services,

Application, IBFS File No. SAT-LOA-20161115-00117 (Filed Nov. 16, 2016) ("Audacy Narrative Exhibit").

³ *See* Audacy Narrative Exhibit at 2.

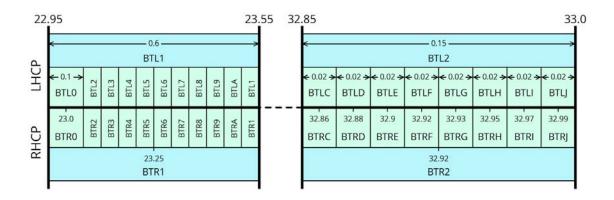
⁴ See Opposition and Response of Audacy Corporation, IBFS File No. SAT-LOA-20161115-00117, at 19-20 (Filed July 7, 2017).

of the 23.18 - 23.38 GHz band in the Relay Satellite ↔ Base User Satellite beams and channels, both identified as BR-- and BT-- in Audacy's Schedule S. The affected sections of Audacy's Application are: Narrative Tables 1 and 2, Figures III-7 and III-8; and Schedule S *Operating Frequency Bands, Receiving Beams, Receiving Channels, Transmitting Beams,* and *Transmitting Channels*.

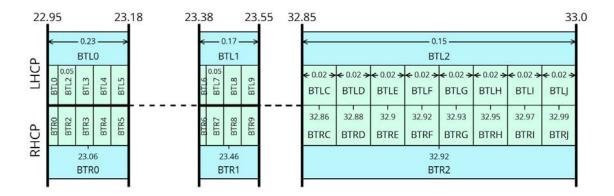
The proposed updates to Audacy's frequency plans are detailed alongside the original plans in the beam/channel diagrams below. As in the original narrative application, beams are shown in blue, channels in green, and frequencies in GHz.

Relay → Base User (Transmit) Beams & Channels (BT--)

Original Frequency Plan (Figure III-7 in the Audacy Narrative Exhibit, p.25):

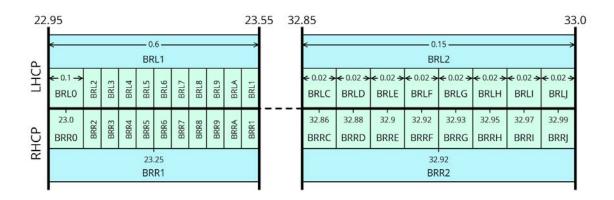


Updated Frequency Plan:

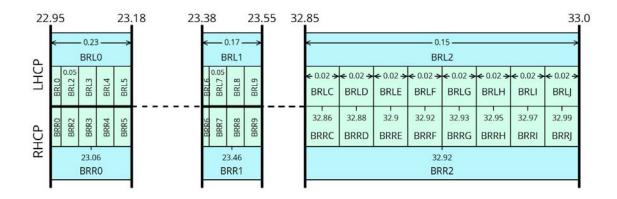


Base User → Relay (Receive) Beams & Channels (BR--)

Original Frequency Plan (Figure III-8 in the Audacy Narrative Exhibit, p. 26):



Updated Frequency Plan:



The above-requested revisions to Audacy's pending NGSO application qualify as minor amendments under Section 25.116 of the Commission's rules, which expressly contemplates corrections of typographical errors and amendments to resolve frequency conflicts with authorized stations or other pending applications that do not create new or increased frequency conflicts.⁵

Audacy Corporation Proprietary

⁵ See § 25.116(c)(1) and (c)(3).

Should the Commission staff have further questions or require clarification, please contact the undersigned or Audacy's counsel.

Sincerely,

/s/

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