

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

In the Matter of

Audacy Corporation

Application for Satellite Space Station Authorizations

File No.

SAT-LOA-20161115-00117

CONDITIONAL WITHDRAWAL OF PETITION TO DENY

On June 26, 2017, Iridium Constellation LLC (“Iridium”) petitioned to deny the application of Audacy Corporation (“Audacy”) for authority to launch and operate a non-geostationary satellite orbit (“NGSO”) system in the fixed satellite service (“FSS”) and inter-satellite service (“ISS”).¹ In its petition, Iridium explained that Audacy would be unable to coordinate its proposed operations in the 22.55-23.55 GHz band with Iridium’s inter-satellite links, which operate in the 23.18 to 23.38 GHz band.² In response to Iridium’s petition, Audacy committed to “fil[ing] a minor modification that removes the 23.18-23.38 GHz band currently used by Iridium for inter-satellite links from Audacy’s pending NGSO application,” and “concurrently amend[ing] its Schedule S to reflect this change.”³

Consistent with its commitment, Audacy has requested that its application be amended to remove any request for authority to operate in the 23.18-23.38 GHz band.⁴ Audacy also

¹ Petition to Deny of Iridium Constellation, LLC, IBFS File No. SAT-LOA-20161115-00117 (filed June 26, 2017).

² *Id.* at 3-6.

³ Opposition and Response of Audacy Corporation at 19-20, IBFS File No. SAT-LOA-20161115-00117 (filed July 7, 2017).

⁴ Letter from James Spicer, Chief Engineer, Audacy, to Marlene H. Dortch, Secretary, FCC, at 1-2, IBFS File No. SAT-LOA-20161115-00117 (filed Aug. 11, 2017).

requested that its application be amended to delete all references to the 23.18-23.38 GHz band from the legal narrative and Schedule S to reflect the change.⁵

The amendment sought by Audacy, if granted, would eliminate any frequency overlap between its proposed system and Iridium's inter-satellite links, and thereby moot the concerns raised in Iridium's petition. Accordingly, Iridium hereby withdraws its petition, conditioned on the Bureau's acceptance of Audacy's request to amend its application.

Respectfully submitted,



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November 14, 2017

⁵ *Id.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Comments of Iridium Constellation LLC was sent by mail on September 14, 2017, to the following:

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