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April 2, 2018

Subject: Audacy Corporation, IBFS File No. SAT-LOA-20161115-00117 (Call Sign S2982)

Dear Ms. Dortch,

Audacy Corporation ("Audacy") herein responds to the Federal Communication Commission's ("Commission's") request for clarification of the term "off-nominal" in the above-referenced application for a non-geostationary satellite system.

Audacy clarifies that the term "off-nominal" refers to scenarios when a Medium Earth Orbit relay satellite's ground-facing, high-gain antenna becomes unavailable for any reason, including in emergency and otherwise anomalous situations. In such cases a backup omni-directional antenna is employed to ensure uninterrupted space-to-ground communications until normal operations can be resumed.

Should the Commission staff have further questions or require clarification, please let me know.

Sincerely,

/s/

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