



College Broadcasters, Inc.

June 18, 2026

Federal Communications Commission
45 L Street NE
Washington, DC 20554

TO:

Brendan Carr, Chairman
Anna Gomez, Commissioner
Olivia Trusty, Commissioner
Albert Shuldiner, Chief, Audio Division
James Bradshaw, Senior Deputy Chief, Audio Division
Lisa Scanlan, Assistant Division Chief, Audio Division
Heather Dixon, Assistant Division Chief, Audio Division
Alexander Sanjenis, Chief, Media Bureau
Joseph Cohen, Media Bureau
Amy Van de Kerckhove, Media Bureau

Dear Chairman Carr, Commissioner Gomez, Commissioner Trusty, and Media Bureau Staff,

My name is Anabella Poland, President of College Broadcasters, Inc. (CBI), a member-driven organization serving students and advisers of student media across the United States, including college and high school radio licensees holding NCE FM and LPFM authorizations. We advocate on behalf of student media outlets such as college and high school radio FCC licensees.

CBI welcomes the Commission's decision to open the first-ever filing window for new NCE reserved band FM translator stations. College broadcasters at times have limited broadcast areas and could benefit greatly from bolstered coverage. We are writing, however, to convey how this important opportunity could be better tailored to the specific needs of educational institutions.

The FCC has announced an August 11–25, 2026 filing window, with a freeze commencing July 10, 2026. This schedule falls squarely in the middle of summer recess and presents a significant

challenge for our constituents. Because campuses chiefly operate on school year calendars, various staff, students, and administrators are not usually active during this period. While stations do maintain some summer staffing, operations are significantly reduced and the ability to conduct business as usual — particularly decisions requiring institutional sign-off — is markedly limited.

Filing an FCC translator application is not a decision a college radio station can make unilaterally. At nearly every institution, the process requires obtaining tentative approval from university administration, engaging a qualified broadcast consulting engineer, preparing the Schedule 349 with all required technical exhibits and certifications, and routing the completed application through the institution's legal counsel and governing office for final authorization. Administrators who hold signing authority are frequently on reduced schedules during the summer, and securing institutional approval for a new broadcast authorization — which carries long-term operational and regulatory obligations — requires deliberate review that summer availability does not accommodate. This process routinely takes several months.

As the FCC is aware, the Commission does not typically contact non-commercial broadcasters directly to inform them of these opportunities. CBI serves as a primary conduit of information to educational licensees nationwide, and we cannot conduct meaningful national outreach until faculty and staff return in the fall — at which point this window will have already closed. This is particularly concerning given that the NCE reserved band was created specifically for educational institutions, which are often the last to learn of opportunities originally reserved for their benefit.

We also note that the announced timing represents a significant departure from the Commission's own historical practice. NCE and LPFM filing windows have customarily been scheduled in October, November, or December, with one instance moved to February — periods that align with the academic calendar and afford educational institutions a meaningful opportunity to participate. Specifically, the NCE FM window in 2007 opened in October; the NCE FM window in 2021 opened in November; the LPFM window originally planned for December 2009 was moved to February 2010; and the 2023 LPFM window, originally set for November, was extended into December. An August window is without precedent and non-inclusive by design, as it falls during the period when educational institutions are least equipped to respond.

The NCE reserved band was established by Congress and the Commission specifically to protect educational institutions — colleges, universities, schools, and community-rooted nonprofits — from being outcompeted for spectrum by well-resourced commercial and non-educational broadcasters. That protective purpose is directly undermined by a window that educational institutions cannot meaningfully access. Well-funded broadcasting organizations that operate year-round, with dedicated legal and engineering staff on retainer, are fully positioned to file during an August window. Educational institutions are not. A filing window that effectively excludes the very organizations the NCE band was designed to serve does not fulfill the Commission's mandate — it inverts it. The result risks delivering these frequencies to operators

whose broadcasting model bears little resemblance to the locally rooted, community-serving educational mission the NCE reserved band was created to advance.

The rules governing new reserved band FM translators were enacted in 2000, and in the 26 years since, there has never been a filing window. This is the Commission's first opportunity — and possibly its only opportunity for years to come — to set a precedent that is fair and inclusive to the educational institutions this band was built for. An August window does not do that. The Commission has one chance to get this right.

Accordingly, CBI respectfully requests that the Commission:

1. Reschedule the NCE reserved band FM translator filing window to November 2026 through February 2027, consistent with the Commission's own historical practice, so that educational licensees have a full and meaningful opportunity to participate; and
2. Issue direct notification to all NCE FM and LPFM licensees regarding this window, rather than relying solely on public notice, so that the institutions for whom this spectrum was reserved are not the last to learn of the opportunity.

If you have any questions concerning this matter, please feel free to contact us.

Respectfully submitted,

Anabella Poland

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