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18-349

August 1, 2018

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AUG - 1 2018

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

Federal Communications Commission
Office of the Secretary

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Re: Notice of Ex Parte Communication MB Docket Nos. 18-119 and 18-227

Dear Ms. Dortch:

On July 31, 2018, Randy Gravely, President and CEO of Tri State Communications (Tri State), and I met with Chairman Pai and his Media Advisor, Alison Nemeth. We discussed issues raised in the FCC's Notice of Proposed Rulemaking (NPRM) in the above-referenced docket proposing policy and rule changes that would impact the resolution of interference complaints against FM Translator stations as well as the Public Notice released by the FCC in MB Docket No. 18-227 requesting information regarding the status of competition in the marketplace for the delivery of audio programming. Mr. Gravely and I expressed our support for the majority of the proposals set forth in the FM Translator NPRM that are intended to expedite the resolution of interference complaints. We explained that a group of broadcasters, including Beasley Media Group, LLC and Tri State will be filing comments that will include empirical evidence based on data provided by Nielsen Audio for 43 Nielsen PPM+Diary measured radio metros which will document that significant listening occurs outside an average FM station's 54 dBu contour and that based on this data we do not support the proposal in the NPRM to use the 54 dBu contour as an outer limit beyond which listener complaints of interference from FM translator stations would not be actionable.

Mr. Gravely and I also discussed the substantial competition for advertising revenue that local broadcasters face from large companies selling digital advertising, including Facebook, Google and Amazon. We expressed support for the proposal espoused by the National Association of Broadcasters to relax the local radio ownership rule and explained that relaxation of the ownership limits will permit radio broadcasters to establish more efficiencies and better serve their communities.

Respectfully submitted,

A handwritten signature in cursive script that reads 'Caroline Beasley'.

Caroline Beasley
CEO, Beasley Media Group, LLC

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cc: Alison Nemeth