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March 5, 2019

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: GN Docket No. 18-238; WC Docket Nos. 17-287, 11-42, 09-197;  
WT Docket No. 18-197; MB Docket Nos. 19-30, 18-349, 17-318**

Dear Ms. Dortch:

On Friday, March 1, 2019, Sarah Morris, Deputy Director at New America's Open Technology Institute, and I met with Commissioner Rosenworcel; Travis Litman, her Chief of Staff and Senior Legal Advisor; and Kate Black, her Policy Advisor.

We began the meeting by reiterating both of our organization's views on the Commission's current, harmful rulemaking proposals for the Lifeline program, and missteps in implementation of the National Verifier program and other eligibility tests for Lifeline recipients.<sup>1</sup> We next discussed the Chairman's press release<sup>2</sup> previewing the forthcoming 2019 Broadband Deployment Report. As we briefly explained in the meeting, and explain now in greater detail in the attached *ex parte* letter that Free Press submitted today, the draft report apparently relies on erroneous data and over-reporting by a single CLEC/WISP claiming wrongly to serve some 62 million persons. This single error greatly overstates the change in broadband deployment at the national level.

At this point, Mr. Litman left the meeting, and we discussed very briefly with Commissioner Rosenworcel and Ms. Black our organizations' ongoing opposition to the T-Mobile/Sprint merger. Free Press also offered preliminary analysis of the Nexstar/Tribune merger as well, but did not express a view on the transaction. We noted that if consummated, it would rely on gross undercounting under the national audience reach cap of viewers actually reached, thanks to continued availability of the technologically obsolete and unjustified UHF discount.

Respectfully Submitted,

/s/ Matthew F. Wood

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<sup>1</sup> See, e.g., Letter to Marlene Dortch from Free Press, Common Cause, National Hispanic Media Coalition, New America's Open Technology Institute, National Consumer Law Center, United Church of Christ OC Inc., and Center for Media Justice, WC Docket Nos. 17-287, 11-42, 09-197 (filed Feb. 28, 2019).

<sup>2</sup> See "Report: America's Digital Divide Narrows Substantially," FCC Press Release (Feb. 19, 2019).