

# Gray Miller Persh LLP

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March 8, 2019

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

Re: Notice of Ex Parte Communication, MB Docket Nos. 17-264, 17-105

Dear Ms. Dortch:

On March 6, 2019, Lonna Thompson, Executive VP and General Counsel of America's Public Television Stations (APTS), Talia Rosen, Assistant General Counsel and Senior Director of Standards & Practices, of the Public Broadcasting Service (PBS) and the undersigned counsel for APTS and PBS, met by telephone to discuss the above-referenced proceedings with Michelle Carey, Holly Saurer, Albert Shuldiner, Martha Heller, Sean Maher and Raelynn Remy of the Federal Communications Commission.

During the meeting, APTS and PBS reiterated their support for exempting or reducing the obligations on public broadcasters from the Commission's rules requiring broadcast licensees to provide public notices of the filings of various applications. APTS and PBS noted that public broadcasters are locally owned and operated stations licensed to governmental entities or nonprofit community boards and that these public broadcasting licensees are statutorily obliged to give notice of and conduct governing board meetings (as well as any community advisory board meetings) that are open to the public, such that interested members of the public already have opportunities to become aware of station's plans and applications.

APTS and PBS discussed whether eliminating on-air public notices and converting to online public notices would ease, or increase, regulatory burdens on public broadcasting stations. APTS and PBS also reiterated their stance that any modernization of the public notice requirements should reduce, not increase, the regulatory obligations on public broadcasters, as compared to the current rule burden.

Respectfully submitted,



Margaret L. Miller

cc Raelynn Remy