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2018 MARCONI "COUNTRY" STATION OF THE YEAR, KCLR
2018 SERVICE TO AMERICA AWARD, KTXY
2018 MBA STATION OF THE YEAR, KSSZ
2018 MBA CORPORATE AWARD, MIRACLES FOR KIDS RADIOTHON
2018 MERCURY AWARD NOMINATION FOR BEST RADIO COMMERCIAL IN AMERICA
2017 ACM PERSONALITIES OF THE YEAR, KCLR
2016 MARCONI "ROCK STATION OF THE YEAR, KCMQ
2016 MARCONI "CHR" STATION OF THE YEAR, KTXY
2015 ACM/CMA STATION OF THE YEAR, KCLR



April 10, 2019

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

Re: Notice of *Ex Parte* Communication, MB Docket No. 18-349

Dear Ms. Dortch:

On April 8, 2019, John Zimmer, President of Zimmer Radio, met with Commissioner Brendan Carr and his policy advisor Evan Swarztrauber. Emmy Parsons of the National Association of Broadcasters (NAB) was also present to assist in drafting this ex parte.

Mr. Zimmer discussed NAB's radio ownership proposal and the Commission's ongoing quadrennial review.¹ Mr. Zimmer voiced his support for the NAB proposal. Under the Commission's current rules, he noted that he is allowed invest in other types of media in his markets, including newspapers and television, but he is barred from investing more in his core competency – radio. At the same time, he said, radio broadcasters are facing tremendous competition in the now-digital media marketplace. Mr. Zimmer also emphasized that while small market broadcasters have the same equipment costs as broadcasters in large markets, they have less potential revenue to compete for. All radio broadcasters, and especially those in smaller markets, must be allowed to achieve greater economies of scale in order to compete against the growing number of digital competitors.

¹ See *2018 Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, Notice of Proposed Rulemaking, MB Docket No. 18-349, at ¶ 13 (rel. Dec. 13, 2018) (citing Letter from Rick Kaplan et al., Legal and Regulatory Affairs, NAB, to Michelle Carey, Chief, Media Bureau, FCC, at 1-4 (filed June 15, 2018)).

Respectfully submitted,

/s/ John Zimmer

John Zimmer
President
Zimmer Radio

cc: Commissioner Brendan Carr, Evan Swarztrauber