



Joshua N. Pila
General Counsel
Local Media Group
T 404-327-3286
Joshua.pila@meredith.com

April 30, 2018

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission

RE: Initial Comments in MB Docket Nos. 18-23, 17-105

Dear Madam Secretary,

Meredith Corporation's Local Media Group ("Meredith") **SUPPORTS** the Commission's tentative conclusion in the Notice of Proposed Rulemaking in the above-referenced dockets to eliminate the requirement in Section 73.2080(f)(2) of the Commission's rules that certain broadcast television and radio stations file the Broadcast Mid-Term Report (Form 397). Meredith fully supports efforts at diversity in broadcast employment, but believes those efforts are better focused on substance than filling out forms.

To that point, Form 397 is an appropriate focus of the Modernization of Media Regulation initiative, as the substantive information included in the form is already in the online public file. It's simply one more form that licensees must fill out and file. Indeed, for substantive outreach information, individuals would review the actual annual reports filed elsewhere in the online public file.

Meredith agrees with the Commission that it has full statutory authority to make these changes. The Form 397 is not statutorily required, and the Commission will still have access to the substantive EEO documentation.

That documentation is extensive and subject to full, random audit. In addition to the information about interviewees, sources, and hires available to the Commission via the annual reports in the public inspection file, random audits give the Commission a wide variety of documentation and data about a licensee's efforts at broad recruitment.

For the record, Meredith does not oppose also listing an appropriate EEO contact in a similar manner via the public file profile or settings section, but questions the necessity of such an addition. In an era of scraping, spam, and phishing, it would seem that the Commission would be better served to send official correspondence to the licensee or its attorneys rather than operational individuals.

Meredith commends the Commission for recognizing the futility of the current Form 397 process, and for implementing more efficient, electronic means whereby the Commission can access the same information with far less burden on licensees.

Very Truly Yours,

A handwritten signature in black ink, appearing to be 'JP' followed by a long horizontal stroke.

Joshua Pila