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May 4, 2020

**Via Electronic Filing**

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

**Re: Notice of *Ex Parte* Communications with  
Alexander Sanjenis, Media Advisor to Chairman Ajit Pai  
Joel Miller, Chief of Staff and Media Legal Advisor to Commissioner Michael O’Rielly  
MB Docket Nos. 17-264, 17-105, 05-6 (Public Notice of the Fling of Applications)**

Dear Ms. Dortch:

The following summary is submitted pursuant to 47 C.F.R. Section 1.1206(b)(1).

On May 1, 2020, the undersigned, Dan Dukes, Senior Director–Government Affairs, iHeartMedia, had separate telephone discussions with Alexander Sanjenis, Media Advisor to Chairman Ajit Pai, and Joel Miller, Chief of Staff and Media Legal Advisor to Commissioner Michael O’Rielly.

During these conversations, the undersigned discussed iHeartMedia’s concerns with certain aspects of the draft Second Report and Order for the *Amendment of Section 73.3580 of the Commission’s Rules Regarding Public Notice of the Filing Applications* (the “Draft Order”).

The undersigned explained that iHeartMedia opposes the requirement in the Draft Order, for broadcast stations that offer to consumers an application or “app” designed for installation on mobile devices, that the app include a link to the web page on which the online notice text appears, in addition to the link to the notice on the station’s Internet website. The undersigned noted several concerns that iHeartMedia has with this proposal, including that iHeartMedia’s individual stations do not maintain individual station apps. Instead, iHeartMedia operates the iHeartRadio app, which allows listeners access to all of iHeartMedia’s stations. Further complicating the current proposal in the Draft Order, in addition to iHeartMedia’s owned stations, the iHeartRadio app also hosts some 1,400 stations owned by other broadcast radio entities. It would be highly disruptive and impractical for iHeartMedia to be required to ensure that proper application notifications were included for its stations on its app, not to mention the even greater number of non-owned radio stations utilizing the iHeartRadio app. Given the logistical problems of linking such information on the iHeartRadio app (which is not station-based), the undersigned advocated for the app requirement be removed entirely in the adopted Second Report and Order. Alternatively, a broadcast station should be given the flexibility to choose to make such disclosures either on its website or its app.

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During the calls, the undersigned also urged the Commission to provide more flexibility in the placement of FCC application notifications on the individual station's website, versus the Draft Order requirement that an "FCC Application" link or tab must be posted "at the top" of a station's home page. iHeartMedia radio stations generally maintain all relevant FCC links in one uniform section at the bottom of each station's web page. The current links include Contest Rules, Public Inspection File, Political File, and EEO File. Requiring placement of the FCC Applications link at the top of each station's web page, while other pertinent FCC file links are grouped together elsewhere on the web page, would only lead to confusion by the public, and minimize the effectiveness of the notification to the public of the station's FCC applications.

Respectfully submitted,

By: /s/ Dan Dukes

Dan Dukes  
Senior Director, Government Affairs  
iHeartMedia

cc: Alexander Sanjenis (via e-mail)  
Joel Miller (via e-mail)