

May 17, 2019

**Via Electronic Filing - Erratum**

Marlene Dortch

Secretary

Federal Communications Commission

445 Twelfth Street, SW

Washington, DC 20554

**Re: Notice of *Ex Parte* Communication in MB Docket No. 18-349 (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) and MB Docket No. 13-249 (Revitalization of the AM Radio Service) and RM-11836, Petition for Rulemaking to Allow the MA3 All-Digital Mode of HD Radio for AM Stations**

Dear Ms. Dortch:

On May 15, 2019, Edward Atsinger, Chief Executive Officer, Salem Media Group (“Salem”); Hugh Hewitt, nationally syndicated radio host with Salem Radio Network; David Spady of River Public Affairs Group and Karl Gallant of Aduston Consulting, consultants to Salem; and Jessica Marventano, Senior Vice President, Government Affairs, iHeartCommunications, Inc. (together with iHeartMedia + Entertainment, Inc., “iHeart”); met with Chairman Pai and Alex Sanjenis, Media Advisor to Chairman Pai.

Mr. Atsinger discussed Salem’s recently filed public comments in the Quadrennial Review. In particular, Mr. Atsinger expressed Salem’s opposition to any changes in the local radio ownership rules and underscored the industry division on the issue of broadcast deregulation, observing that Urban One, the National Association of Black-Owned Broadcasters and the Multi-Cultural, Media, Telecom and Internet Council oppose the proposal put forward in this proceeding by the National Association of Broadcasters’ (“NAB”). Mr. Atsinger expressed concern with the foreseeable and troubling migration of content from the AM band to the FM band, noting past content migration in Washington, DC and Atlanta, Georgia.

While Mr. Atsinger and Ms. Marventano noted their companies’ unified opposition to the NAB’s FM ownership proposal, Ms. Marventano noted that while both Salem and iHeart view the same marketplace challenges facing AM radio, iHeart, as expressed in its comments in this proceeding, believes that the elimination of AM ownership restrictions will improve the current audience and revenue disparities between AM stations and their FM counterparts, as well as create new investment opportunities for radio owners. Mr. Atsinger noted Salem’s current preference is to retain all the local ownership rules on AM radio but recognized there may be some modest benefit to possibly removing only the subcaps on AM.

Mr. Atsinger underscored the role of the federal government with regard to a regulated industry like broadcast radio. Mr. Hewitt noted the profound and unforeseen consequences that may occur in the abrupt transition of highly regulated markets entering a deregulatory phase while Ms. Marventano added that there is a real public interest imperative for the Commission to ensure the continued health of AM stations as both a source of information for

communities during local emergencies and as critical component of the Federal Emergency Management Agency's nationwide public safety and national security communications infrastructure.

Mr. Hewitt also discussed the importance of AM broadcast radio talents' reliance on the current local radio ownership rules in making career and capital investment decisions consistent with his July 3, 2018 letter to Chairman Pai (attached herein).

Regarding the Commission's AM Revitalization proceeding, Mr. Atsinger noted Salem's support of the Commission's proposal to increase the level of protected field strength, thereby enabling stations to increase power to overcome higher levels of manmade noise. Mr. Atsinger reiterated Salem's support for the proposal as presented, including the reduced protection to Class A stations nighttime coverage. He went on, however, to recognize that the latter relief is probably the only controversial part of the proposal and that the Commission ought to be able to act on the remainder forthwith.

Separately, Ms. Marventano noted iHeart's support for the Commission's actions to date in the AM Revitalization proceeding that have resulted in improvements to the AM band, and which have enjoyed broad industry support, and urged the Commission to continue its consensus-based approach in this proceeding. Accordingly, iHeart opposes proposals to modify interference protections for AM radio.

Finally, in response to a question from Mr. Sanjenis about the Petition for Rulemaking filed by Bryan Broadcasting Corporation concerning optional all-digital operation for AM stations, Mr. Atsinger stated that, as a threshold matter, Salem is concerned about the lack of digital receivers currently in the marketplace, and that he looks forward to reviewing the Petition.

Respectfully submitted,



Russell R. Hauth  
Senior Vice President  
Government Relations

Attachment

cc: Alex Sanjenis (via e-mail)  
Michelle Carey (via e-mail)  
Al Shuldiner (via e-mail)