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Via Electronic Filing

May 20, 2019

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th St., N.W.
Washington, DC 20554

Re: **Notice of Ex Parte Communication, MB Docket Nos. 18-202, 17-105, 17-318**

Dear Ms. Dortch:

This letter reports on several meetings on May 16, 2019, during which Terri Santisi of ION Media Networks ("ION") and Jason Rademacher and the undersigned of Cooley LLP met with Commissioner Geoffrey Starks and Michael Scurato, Acting Legal Advisor for Media and Consumer Protection. The participants in the meeting discussed ION's business model, its general experience with the post-auction repack, its commitment to over-delivering children's programming in all of its markets. Ms. Santisi reiterated ION's view that the FCC's children's programming record-keeping and reporting requirements should be modernized to reduce the administrative burden on ION's 70 television stations. The parties also discussed the national multiple ownership rule and ION's position that the national audience reach cap should be 78% to reflect the effective cap adopted by Congress in 2004.

A copy of this letter is being filed in the above-referenced dockets through the Commission's Electronic Comment Filing System and a copy is being provided by email to each of the Commission meeting participants.

Sincerely,

/s/ Robert M. McDowell

Robert M. McDowell
Counsel to ION Media Networks

cc: Commissioner Geoffrey Starks
Michael Scurato