



May 20, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication, MB Docket No. 18-349, GN Docket No. 18-122

Dear Ms. Dortch:

On May 16, 2019, Mary Berner, Chief Executive Officer, President, and Director, and Collin R. Jones, SVP, Corporate Development & Strategy both of Cumulus Media Inc. (“Cumulus”), had separate meetings with Commissioner O’Rielly, his Chief of Staff and Media Legal Advisor Joel Miller, Commissioner Carr and his Policy Advisor Evan Swarztrauber, Commissioner Rosenworcel and her Policy Advisor Kate Black, and Commissioner Starks and his Acting Legal Advisor for Media and Consumer Protection, Michael Scurato.

During these meetings, Cumulus discussed the Commission’s ongoing review of its broadcast ownership rules. Specifically, Cumulus expressed its strong support for the National Association of Broadcasters’ proposal to modernize the local radio ownership rule.¹ The broadcast radio industry is facing unprecedented competition from other audio, as well as non-audio, sources for both audience and advertising dollars. Relaxing the FCC’s ownership regulations will enhance investment in the business, increase the ability of radio broadcasters to successfully compete and help provide local stations with the necessary resources to serve their listeners.

Cumulus also discussed the need for the Commission to ensure that any reallocation of spectrum in the C-band proceeding protects radio listeners who rely on programming delivered via C-band spectrum. The Commission should ensure that sufficient spectrum remains to preserve the C-band as a reliable and ubiquitous means of content distribution and that, to the extent there is any transition, it is fully funded and provides for continuity of service.

Respectfully Submitted,



Collin R. Jones
Senior Vice President, Corporate Development & Strategy
Cumulus Media Inc.

¹ See 2018 Quadrennial Regulatory Review, Notice of Proposed Rulemaking, MB Docket No. 18-349, FCC 18-179, at ¶ 13 (Dec. 13, 2018) (citing Letter from Rick Kaplan, *et al.*, Legal and Regulatory Affairs, NAB, to Michelle Carey, Chief, Media Bureau, FCC (June 15, 2018)).

cc: Commissioner O’Rielly
Commissioner Carr
Commissioner Rosenworcel
Commissioner Starks
Joel Miller
Evan Swarztrauber
Kate Black
Michael Scurato