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May 21, 2019

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

Re: ***Updating the Commission's Rule for Over-the-Air Reception Devices***
(FCC WT Docket 19-71)

Dear Madam Secretary:

On May 18, 2019, while attending the FCBA's Annual Seminar at the Homestead Resort, the undersigned, as counsel for a coalition¹ that will be filing comments in the above-captioned matter, had an informal conversation with Commissioner Michael O'Rielly about the OTARD Expansion proceeding. Out of an abundance of caution, I am filing this ex parte letter and copying Erin McGrath, the Commissioner's Legal Advisor.

Our conversation focused on how the FCC's proposal went far beyond the original intent and delegation of authority to the Commission pursuant to Section 207 of the Telecommunications Act, and that we looked to Commissioner O'Rielly to continue his practice of steadfastly honoring the spirit and letter of the Telecommunications Act.

Sincerely,

Gerard Lavery Lederer
for BEST BEST & KRIEGER LLP

cc: Erin McGrath (by email)

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¹ The coalition at present includes the United States Conference of Mayors, The Texas Coalition of Cities for Utility Issues, the cities of Boston, MA; Dallas, TX; Los Angeles, CA; Fountain Valley, CA, and Montgomery County Maryland. Others may join before the comments are filed.