

August 19, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: Revision of the Public Notice Requirements of Section 73.3580, MB Docket No. 17-264

Dear Ms. Dortch:

On August 12, Andrew Jay Schwartzman and Angela Campbell of the Institute for Public Representation and Yosef Getachew and Corian Zacher of Common Cause met with Albert Shuldiner, Lisa Scanlan, and Thomas Nessinger of the Audio Division of the Media Bureau, and Holly Saurer, Deputy Chief of the Media Bureau, to discuss the public notice requirement for broadcast applications addressed in the above-captioned proceeding.

The public interest representatives reiterated the arguments discussed in the December 2017 comments of UCC *et al*, namely, that the Commission should not weaken or eliminate the local public notice requirement for broadcasters. Rather, the Commission should make the public notice more effective by requiring that the public notice state if the applicant is seeking a waiver of rule.<sup>1</sup> Clear and transparent local public notice enables the public to exercise its rights to participate in license proceedings and helps the Commission ensure that applicants fulfill their public interest obligations.

As explained in the UCC's March 2018 Ex Parte, waiver requests of the Commission's rules are currently inaccessible to the public because they are not included in the applicants' public notice.<sup>2</sup> The Commission's rules must advance the public interest, and waiver requests presume that an applicant seeks an action contrary to the public interest. It is paramount that members of the public have meaningful and effective notice of those instances so they may raise public interest considerations with the Commission.

Respectfully submitted,

/s/ Yosef Getachew  
Common Cause  
805 15<sup>th</sup> Street, NW Suite 800  
Washington, DC 20005

---

<sup>1</sup> See generally Comments of United Church of Christ *et al.*, Revision of the Public Notice Requirements of Section 73.3580, MB Docket No. 17-264 (filed Dec. 29, 2017).

<sup>2</sup> See Letter from Angela J. Campbell, Institute for Public Representation, to Marlene H. Dortch, Secretary, Federal Communications Commission, Revision of the Public Notice Requirements of Section 73.3580, MB Docket No. 17-264, at 2 (filed March 9, 2018).

cc:   Albert Shuldiner  
      Holly Saurer  
      Lisa Scanlan  
      Thomas Nessinger