



GEORGETOWN LAW
INSTITUTE FOR PUBLIC REPRESENTATION

Directors
Hope M. Babcock
Angela J. Campbell
Benton Senior Counselor
Andrew Jay Schwartzman
Staff Attorneys
Yael Bromberg
James Graves
Chris Laughlin*
Andrew Mendrala
Ariel Nelson**
Adam Riedel

600 New Jersey Avenue, NW, Suite 312
Washington, DC 20001-2075
Telephone: 202-662-9535
Fax: 202-662-9634

September 1, 2017

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

RE: *UHF Discount*, MB Docket No. 13-236
2014 Quadrennial Review, MB Docket No. 14-50
Media Modernization, MB Docket No. 17-105

Dear Ms. Dortch:

On August 31, 2017, Angela Campbell, Andrew Jay Schwartzman, Chris Laughlin, JeanAnn Tabbaa, and Ethan Plail of the Institute for Public Representation (IPR) at Georgetown University Law Center met with Commissioner Jessica Rosenworcel and Holly Saurer, Acting Advisor to Commissioner Rosenworcel. IPR presented case developments and reiterated IPR's position in several ongoing matters in the above-referenced dockets.

Regarding the *UHF Discount* proceeding, IPR updated Commissioner Rosenworcel and Ms. Sauer on the status of the pending litigation in the DC Circuit.

With respect to the *UHF Discount* proceeding, IPR restated its position that the discount serves no technical purpose after the conversion to digital television and that the Commission's reinstatement of the rule is arbitrary and capricious. IPR also reiterated its position that the Commission lacks authority to repeal or modify the 39% national ownership cap, but that it can independently consider whether to repeal or modify UHF Discount.

* Admitted to the Colorado bar. Supervised by a member of the DC bar.

** Admitted to the California bar. Supervised by a member of the DC bar.

Concerning the *2014 Quadrennial Review* (2014 QR), IPR updated Commissioner Rosenworcel and Ms. Sauer on the status of the Third Circuit's review of the 2014 QR in *Prometheus IV*. The Commission filed a motion to hold the case in abeyance until the agency takes up the 2014 QR on reconsideration. IPR opposed the motion on the grounds that the issue of ownership data collection and assessment is distinct from the other issues in the 2014 QR. IPR noted that the Third Circuit has not issued a decision on the abeyance motion.

With respect to *Media Modernization*, IPR highlighted its filings in response to several concerning proposals made by broadcasters, cable companies, and their trade associations. Specifically, IPR argued in its filings that the Commission should not entertain requests to eliminate the online public file,¹ the children's reporting requirement and advertising limits,² and the Form 323 ownership reporting requirements.³

Respectfully Submitted,

/s/

Angela J. Campbell

Institute for Public Representation

cc: Commissioner Rosenworcel
Holly Sauer

¹ Reply to Comments Proposing Changes to the FCC's Public File Requirements, United Church of Christ, Office of Communications, Inc., *et al.*, MB Dkt. No. 17-105 (Aug. 04, 2016).

² Reply to Comments Proposing Changes to the FCC's Children's Television Rules, Campaign for Commercial Free Childhood and the Center for Digital Democracy, MB Dkt. No. 17-105 (Aug. 04, 2016).

³ Reply to Comments Proposing Changes to the FCC's Rules Concerning Station Ownership, Prometheus Radio Project, MB Dkt. No. 17-105 (Aug. 04, 2016).

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