



WASHINGTON, DC

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November 8, 2018

**VIA ECFS**

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: **Notice of Ex Parte Communication, MB Docket Nos. 18-119 and 18-227**

Dear Ms. Dortch:

On November 7, 2018, Caroline Beasley, Chief Executive Officer, Beasley Media Group, and the undersigned met with Commissioner Brendan Carr and his Media Legal Advisor, Evan Swartrauber, to discuss certain issues raised in the above-captioned proceedings.

Specifically, Ms. Beasley discussed the dramatic changes in the audio marketplace and the resulting need for modifications to the local radio ownership limits in the upcoming 2018 quadrennial review. Ms. Beasley emphasized that in the current environment local broadcasters face intense competition for both listeners and advertising revenues from satellite radio, Pandora, Google, Facebook, Spotify and many other radio alternatives that operate free of any comparable regulatory limits.

Ms. Beasley expressed support for the proposal submitted by the National Association of Broadcasters in June 2018 that would modernize the current local radio ownership limits in larger markets and provide additional relief in smaller markets.

Ms. Beasley also discussed the Joint Comments and Reply Comments filed by Beasley and other broadcasters in MB Docket No. 18-119 proposing certain changes to the FM translator

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complaint resolution process. In particular, she explained why, based on the data submitted with the Comments, the Commission should not adopt the 54 dBu contour as the outer limit for interference complaints as proposed in the NPRM and that if an outer limit is adopted, the 42 dBu contour would be more appropriate.

Respectfully submitted,



Sally A. Buckman

cc: Commissioner Brendan Carr  
Evan Swarztrauber