Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, S.W.

Washington, DC  20554

**Re: Notice of Ex Parte Presentation Concerning Broadcast Media Ownership Reform**

On Tuesday, November 7th, Katie McAuliffe, Executive Director of Digital Liberty and Federal Affairs Manager at Americans for Tax Reform, met with Brooke Ericson, Erin McGrath, and Amy Bender of Commissioner O’Rielly’s Office, to discuss a number of topics before the Commission including, broadcast media ownership reform, the Telephone Consumer Protection Act, and the Restoring Internet Freedom proceeding.

This filing addresses broadcast media ownership reform. Separate filings cover the additional topics.

We discussed the position of Americans for Tax Reform and Digital Liberty that given the changes in the media market as a whole since 1975, we think it is time to change the restrictions on the ability of broadcast stations and newspapers to have common owners, of stations to have joint sales agreements, and the number of stations one entity can own in a market.

Localism is an important value that the FCC takes into consideration when promulgating rules. Without the Chairman’s proposed changes newspapers will continue to fade and in depth reporting at the local, state, and national level will suffer. By maintaining the status quo, the FCC would be endangering local news sources and outlets, thereby neglecting its charge to protect localism.

In terms of cross ownership, newspapers are fading at the expense of local news. We do not believe the rules from 1975 are working to foster local news in the current media environment. A broadcast station can’t own a published newspaper, if a print edition comes out 4 or more times a week, but other modern outlets, like cable and online, publish 24 hours a day and are not subject to these types of ownership restrictions.

As websites, social networks, YouTube, podcasts, Amazon Prime and other sources for information and entertainment continue to grow in popularity, advertising revenue has dipped for newspapers, television and radio stations. Joint sales agreements make local media more attractive in an increasingly competitive pool for advertising dollars.

We believe that updated rules, examining ownership of more than one station in a broadcast market on a case-by-case basis rather than the eight voices test, will allow the FCC the flexibility to take into consideration the varying composition of media markets across the country.

These changes will promote local news availability and maintain a diversity of voices across the entire media market.

For more detail on the position of Americans for Tax Reform and Digital Liberty, please find enclosed two articles on the topic of media ownership reform.

Thank you for your consideration.

Regards,

Katie McAuliffe

Executive Director, Digital Liberty

Federal Affairs Manager, Americans for Tax Reform

722 12th Street NW, Fourth Floor

Washington, D.C. 20005

202-785-0266