

Ex Parte

November 18, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *2014 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, **MB Docket No. 14-50**; 2010 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, **MB Docket No. 09-182**; Promoting Diversification of Ownership In the Broadcasting Services, **MB Docket 07-294**; Rules and Policies Concerning Attribution of Joint Sales Agreements in Local Television Markets, **MB Docket 04-256**; Rules and Policies to Promote New Entry and Ownership Diversity in the Broadcasting Services, **MB Docket No. 17-289**; Amendment of Section 73.3555(e) of the Commission’s Rules, National Television Multiple Ownership Rule, **MB Docket No. 17-318***

Dear Ms. Dortch:

On Thursday, November 14, 2019, Byron Allen, Weather Channel owner and the Founder, Chairman and CEO of Allen Media Broadcasting; Tom O’Brien, President of the Weather Channel and EVP of Allen Media; Janice Arouh, President, Network Distribution and Marketing and Mark DeVitre, EVP and General Counsel, of Entertainment Studios Networks; Lindsay Austin and Misha Tseytlin from Troutman Sanders, and David Goodfriend and the undersigned of The Goodfriend Group, met with the following:

1. Chairman Ajit Pai and Alexander Sanjenis, Media Advisor for the Office of the Chairman (Mr. Goodfriend did not attend);
2. Commissioner Michael O’Rielly and Joel Miller, Chief of Staff and Senior Media Legal Advisor, (Ms. Austin and Mr. Tseytlin did not attend);
3. Commissioner Brendan Carr and Ben Arden, Media Legal Advisor, (Mr. Goodfriend did not attend);
4. Commissioner Jessica Rosenworcel and Kate Black, Media Policy Advisor (Ms. Austin and Mr. Tseytlin did not attend);

5. Commissioner Geoffrey Starks and Michael Scurato, Acting Legal Advisor for Media and Consumer Protection and Alisa Valentin, Special Advisor (Ms. Austin and Mr. Tseytlin did not attend).

Participants discussed broadcast media ownership reform and the state of diversity among general market media owners. Participants discussed a number of unique challenges impacting minority owners of broadcast and cable/satellite media outlets, particularly the difficulty of obtaining access to capital. The impact of streaming technology on the future of broadcast services was also discussed in reference to the restrictive contractual prohibitions which limit affiliates' ability to stream primetime content.

Specific policy issues included the impact of national television ownership rules and policies on media ownership diversity and the Commission's commitments to fostering more diversity of ownership in broadcast services. In the context of a conversation about the so-called UHF discount and the national television audience reach cap, participants said that the national cap did not need to be lifted— that 39% is high especially considering that the UHF discount effectively expands national reach to 78%. There also was discussion regarding whether the Commission could foster minority ownership of broadcast television stations by encouraging more favorable reverse network compensation structures for minority owners.

In closing, parties encouraged the Chairman and Commissioners to continue exploring novel ways to improve the competitive landscape for minority owned media entities.

Respectfully submitted,

_____/s/_____

DeVan Hankerson, Goodfriend Group

cc:

Chairman Ajit Pai, Federal Communications Commission
Commissioner Michael O'Rielly, Federal Communications Commission
Commissioner Brendan Carr, Federal Communications Commission
Commissioner Jessica Rosenworcel, Federal Communications Commission
Commissioner Geoffrey Starks, Federal Communications Commission
Alexander Sanjenis, Media Advisor for the Office of the Chairman
Joel Miller, Chief of Staff and Senior Media Legal Advisor,
Office of Commissioner Michael O'Rielly
Ben Arden, Media Legal Advisor, Office of Commissioner Brendan Carr
Kate Black, Media Policy Advisor, Office of Commissioner Jessica Rosenworcel
Michael Scurato, Acting Legal Advisor for Media and Consumer Protection,
Office of Commissioner Geoffrey Starks
Alisa Valentin, Special Advisor, Office of Commissioner Geoffrey Starks