



November 18, 2014

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

Re: Notice of Ex Parte Communication, MB Docket Nos. 12-83; 13-249

Dear Ms. Dortch:

On Friday, November 14, 2014, Erin Dozier and the undersigned of the National Association of Broadcasters ("NAB") met with Clint Odom, Policy Director to Commissioner Rosenworcel.

During the meeting, we expressed NAB's view that the advent of online video distributors ("OVDs") presents an exciting opportunity for local television broadcasters and other content providers by offering them another means to reach potential viewers. OVDs also can bring needed competition and consumer choice to the existing multichannel video programming distributor ("MVPD") market.

For the public to reap the full benefits of this opportunity, NAB believes that the Commission must consider how best to foster growth of OVDs, and how its actions concerning OVDs and MVPDs can promote, rather than diminish, localism. Among other things,¹ OVDs must limit the geographic scope of their offerings consistent with the scope of the retransmission consent and other rights they may negotiate in the marketplace, and the Commission's exclusivity rules. NAB is looking forward to working with FCC staff on the many complex issues in this proceeding to ensure that the FCC produces the best possible outcome that is also faithful to the Communications Act.

¹ See, e.g., NAB Reply Comments in MB Docket No. 12-83 (June 13, 2012); NAB Comments in MB Docket No. 12-83 at 4-7 (May 12, 2012) (discussing the importance of ensuring regulatory parity among MVPD services, including applying signal carriage and program exclusivity requirements to OVDs).

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We also discussed the importance of taking swift action on pending proposals to revitalize AM broadcast services. There appears to be absolutely no opposition to the item. We stated that, in spite of existing technical challenges, AM radio remains a distinctive, popular source for local news, public affairs, sports and foreign-language programming. Many of these stations provide niche formats serving diverse local communities, and in a sizeable portion of America's rural areas, AM service remains the primary source for radio programming. Modifying the Commission's rules to effectuate technical and policy changes will enhance AM signal quality and promote the continued viability of AM radio broadcasting.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick A. Kaplan", with a long horizontal line extending to the right.

Rick A. Kaplan
Executive Vice President and General Counsel
Legal and Regulatory Affairs

cc: Clint E. Odom