WOMBLE CARLYLE SANDRIDGE & RICE
A LIMITED LIABILITY PARTNERSHIP

1200 Nineteenth Street, NW
Suite 500
Washington, DC 20036

Telephone: (202) 467-6900
Fax: (202) 467-6910
www.wcsr.com

Gregg P. Skall
Direct Dial: 202-857-4441
Direct Fax: 202-261-0041
E-mail: GSkall@wcsr.com

February 26, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
Room TW B204
The Portals
445 12th Street SW
Washington, DC 20554

Re: Notice of Ex Parte
GN Docket No. 12-268
MB Docket No. 14-127
MB Docket No. 14-261
MB Docket No. 13-249
MB Docket No. 14-226

Dear Ms. Dortch:

This letter is submitted pursuant to Section 1.1206 of the Commission's rules to disclose the communications made in the above referenced proceedings. On Wednesday, February 25, 2015 approximately 12 representatives of the California Broadcasters Associations (the "CBA") including both radio and television broadcasters and the undersigned counsel met with Commissioner Ajit Pai.

Television Incentive Auctions and Repacking. Broadcasters expressed their concern that sufficient funds be available to reimburse television stations fully for any required rebanding costs pursuant to the repacking scheme adopted by the Commission. Broadcasters also made the point that there is a need for continued service to communities served by low power television stations and translators so that they continue to have free over-the-air television broadcasting services following the incentive auction and repacking plan.

Radio Online Public File. Broadcasters made the points that, while converting the public file for radio stations to the FCC online system is not objected to by many radio licensees, there must be special accommodations for small market and limited staffed stations. A burden should not be placed upon these stations so that it detracts from their ability to deliver programming services to their communities. The additional point was made that the FCC cannot yet rely on hosting services, as mentioned in its NPRM because the FCC staff has so far been unable to provide a reliable and efficient interface for hosting services to efficiently load documents into their client stations online public files.

MDPD Redefinition. The broadcasters supported the redefinition of MDPDs provided that retransmission consent will apply to all these redefined MDPDs. Further, the redefinition should be accomplished in a fashion that will accommodate broadcasters' own efforts to provide multi-platform delivery for their own programming, including their full program schedule. A discussion ensued respecting the interdependence of the FCC's actions and those of the Copyright Office and its treatment of the compulsory license as it applies to MVPDs or others within a redefinition of the term by the FCC.

AM Revitalization. Broadcasters made the point that it is time for the AM Revitalization docket to be concluded and for the commission to issue its report in order. Many AM broadcasters are awaiting this action and many of their communities that continue to be dependent upon an AM station will be benefited by the results of this docket.

Licensee-Conducted Contest Notification and Internet Delivery of Other Required Notifications. Broadcasters made the point that they fully support a transition to contest notifications and other required notifications via the Internet by an appropriate reference in the content of the actual broadcast message. Consumers will be benefited and better informed by their ability to access this information in more detail and at their own pace with an adequate reference to where it may be obtained.

Should there be additional questions regarding this submission, kindly contact the undersigned.

Sincerely,

WOMBLE CARLYLE SANDRIDGE & RICE
A Limited Liability Partnership

Gregg P. Skall
Counsel to the California Broadcasters Association

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