



May 31, 2016

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

Re: *Ex Parte* disclosure pursuant to 47 CFR § 1.1206(b) in 14-50, 09-182, 07-294

Dear Ms. Dortch:

On May 27, I spoke briefly by telephone with David Grossman of Commissioner Clyburn's office on behalf of UCC OC Inc.

I reviewed some of the same points raised in my May 23 meeting with the Media Bureau. I emphasized the importance of the FCC's obligation to gather the necessary data and studies to consider and adopt policies that will increase ownership rates by women and people of color, particularly in light of the new mandate in *Prometheus v. FCC*.

I also reviewed the following points:

- The FCC should correct its mis-statements that, if left uncorrected, could damage future consideration of these questions once the FCC does create a sufficient statistical record--in particular ignoring the previous Adarand studies and the FCC conclusion that it must emulate university admissions in order to pursue viewpoint diversity.¹ The Commission should pursue jointly theories of viewpoint diversity and remediation, not choose between them.²
- UCC OC Inc. believes that the conclusion that radio has such a small contribution to viewpoint diversity that it could be jointly owned with a local newspaper could undermine the FCC's constitutional authority to consider ownership identity for radio.³

I expressed an interest in discussing additional matters under consideration in this docket.

Sincerely,

Cheryl A. Leanza
Policy Advisor

¹ Joint Reply comments of UCC OC Inc. and Common Cause at 13 available at <http://apps.fcc.gov/ecfs/document/view?id=60000979207>; see also FNPRM at para. 298.

² *Id.* at 3, 12-13.

³ See Letter from Cheryl A. Leanza to Marlene Dortch, Docket Nos. 14-50, 09-182, 07-294 (filed May 25, 2016), available at: <http://apps.fcc.gov/ecfs/document/view?id=60002057309>.