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June 10, 2016

Marlene Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th St. S.W.  
Washington, D.C. 20554

RE: 2014 Quadrennial Review *et al.*, MB Dockets 14-50, 09-182 and 07-294

Dear Ms. Dortch:

This letter reports on three meetings that were held June 9, 2016 with: (1) Ruth Milkman, Chief of Staff to Chairman Tom Wheeler, and Jessica Almond, Media, Public Safety, and Enforcement Legal Advisor to Chairman Tom Wheeler; (2) Mark A. Paul, Legal Advisor to Commissioner Jessica Rosenworcel; (3) Commissioner Mignon Clyburn, and J. David Grossman, Chief of Staff and Media Advisor to the Commissioner. MMTC President and CEO Kim Keenan attended meetings (2) and (3). MMTC President Emeritus and Senior Legal Advisor David Honig and MMTC Law Clerk Meagan Sunn attended meetings (1), (2) and (3).

These meetings were held to discuss five of the 17 proposals to be considered by the Commission in the wake of *Prometheus Radio Project v. FCC*, Case No. 15-3863 (3d Cir., slip op., May 25, 2016) ("*Prometheus III*"). The numbering system used for the proposals is that used in the Supplemental Comments of the Diversity and Competition Supporters in Response to the Notice of Proposed Rulemaking, 2010 Quadrennial Review *et al.*, MB Docket Nos. 09-182 and 07-294 (filed April 3, 2012) ("Supplemental Comments"). The history and substantive details of all of the proposals are provided in the Supplemental Comments. The proposals discussed in the three meetings are:

- Proposal 5: Examine How to Promote Minority Ownership as an Integral Part of All FCC General Media Rulemaking Proceedings
- Proposal 10: Extend the Cable Procurement Rule to Broadcasting
- Proposal 33: Mathematical Touchstones: Tipping Points for the Non-Viability of Independently Owned Radio Stations in a Consolidating Market and Quantifying Source Diversity
- Proposal 37: Engage Economists to Develop a Model for Market-Based Tradable Diversity Credits as an Alternative to Voice Tests

Marlene Dortch, Esq.

June 10, 2016

Page 2.

- Proposal 40: Create a New Civil Rights Branch of the Enforcement Bureau.

The proposals were discussed with regard to their potential cost of implementation, timing, need for record-building, and the extent to which minority entrepreneurs and the public would benefit.

MMTC will reconvene with the Media Bureau and OGC staff on June 14 for a follow up meeting. Thereafter MMTC will promptly submit a revised and annotated set of proposals.

Sincerely,

*David Honig*

David Honig

President Emeritus and Senior Advisor

cc: Hon. Mignon Clyburn  
Ruth Milkman, Esq.  
Jessica Almond, Esq.  
Mark A. Paul, Esq.  
J. David Grossman  
Kim Keenan, Esq.  
Meagan Sunn