

**MINORITY MEDIA AND TELECOMMUNICATIONS COUNCIL**

**ORIGINAL**

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OCT 15 2002

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October 15, 2002

Hon. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

RE: ME Docket No. 02-277 (Biennial Review of  
Broadcast Ownership Rules

MM Docket No. 01-235 (Broadcast/Newspaper  
Crossownership)

MM Docket No. 01-317 (Local Radio Ownership)

MM Docket No. ~~00-240~~ <sup>00-244</sup> (Definition of Radio  
Markets)

FILED

Pursuant to 47 CFR §1.1206, this will disclose that in these permit-but disclose proceedings, representatives of the Minority Media and Telecommunications Council ("MMTC") and the League of United Latin American Citizens ("LULAC") made an ex parte presentation at a Friday, October 11, 2002, 3:00 PM meeting with Commissioner Kathleen Abernathy and Stacy Robinson, Esq., Legal Assistant to Commissioner Abernathy. Our delegation consisted of Eduardo Peña, Esq., communications counsel for LULAC, and myself.

We presented copies of the "Motion for Revision of Procedural Dates, Expansion of the Scope of the Proceeding, and Inclusion of Additional Studies in the Record" filed by MMTC and the National Association of Black Owned Broadcasters ("NABOB") (dated October 9, 2002 and filed October 10, 2002). We maintained that because of the wide scope and complexity of the issues in

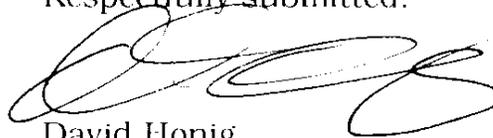
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the proceeding, the short Lime limits for public comment would ensure that parties would just submit their hard line views, without the benefit of consultation with other parties or empirical research. We stated that MMTC was going to convene a meeting of stakeholders in the next few weeks to examine how the issues in the proceeding can be narrowed, whether research can be performed jointly by the parties, and whether regulatory relief in these proceedings could be fashioned to promote minority ownership.

We suggested that a supplement to the NPRM be issued to ask the parties to comment on how minority ownership would be affected and how it can be promoted through the ownership rules under consideration. Further, we suggested that the Commission should continue its policy, followed since 1995, of examining attribution rules in concert with its structural ownership rules. Finally, we urged the inclusion of five of the Section 257 (Adarand) studies in the record of the omnibus ownership proceeding.

An original and two copies of this letter are being filed with the Secretary

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David Honig', written over a horizontal line.

David Honig  
Executive Director

cc: Hon. Kathleen Abernathy  
Stacy Robinson, Esq.

/dh