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April 24, 2003

APR 25 2003

By Hand Delivery

delivered to
by hand

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

Re: Ex Parte Notice – MB Docket No. 02-277 and MM Docket
Nos. 01-235, 01-317 and 00-244 (2002 Biennial Regulatory
Review of the Commission's Broadcast Ownership Rules and
Other Rules)

Dear Ms. Dortch:

On Thursday, April 24, 2003, Jonathan Blake, Robert Long and Heidi Doerhoff, representing the Network Affiliated Stations Alliance ("NASA") met with John Rogovin, General Counsel, and Louis Peraertz, Marilyn Sonn and Linda Kinney of the Office of General Counsel to address one specific legal issue that has recently been raised in connection with the 35% cap aspect of this proceeding -- whether the Court would apply a laxer standard or accord the Commission greater deference if it were to modify or eliminate the 35% national ownership cap, as opposed to retaining it. The NASA representatives pointed out that the same record that must be evaluated to determine whether to retain the 35% cap as continuing to be in the public interest would have to be used to support a decision to change the level of the cap or eliminate it. Accordingly, there is no basis, in our judgment, for presupposing that a decision to increase the 35% cap (or eliminate it) would receive different, more accommodating judicial review. And in view of the evidence in the record, **NASA** believes that such a decision would be more vulnerable to judicial challenge.

Pursuant to Section 1.1206(b) of the Commission's Rules, an original and 8 copies of this letter (two copies for each docket number) are being submitted to the Secretary's office, with copies to those at the FCC that attended the meetings. Copies of this letter also have been provided to Mania Baghdadi, Linda Senecal, and Qualex International and in Public Notice DA-01 1264.

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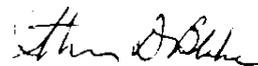
Mr. Marlene H. Dortch

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Please direct any questions regarding this notice to the undersigned

Respectfully submitted,



Jonathan D. Blake
Counsel for NASA

cc: John Rogovin, Esq.
Louis Peraertz, Esq.
Marilyn Sonn, Esq.
Linda Kinney, Esq.
Robert Long, Esq.
Heidi Doerhoff, Esq.