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May 13, 2003

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

Re: Notice of Ex Parte Presentation
MB Docket No. 02-277; MM Docket Nos. 01-235, 01-317, 00-244

Dear Ms. Dortch:

On May 12, 2003, Bruce T. Reese, CEO of Bonneville International Corporation ("Bonneville") and outside counsel Adam D. Krinsky and the undersigned met with Commissioner Kathleen Q. Abernathy and her Legal Advisor Stacy Robinson to discuss the newspaper/broadcast cross-ownership rule. In particular, Bonneville noted that there is no rationale to retain the newspaper/radio rule or for any limits, direct or indirect, on common ownership of newspapers and radio stations.

Elimination of the rule would provide significant opportunities for newspaper owners to improve the news and information programming on radio stations. The record demonstrates that radio stations under common ownership with newspapers offer more local news and better quality non-entertainment programming than other radio stations.[1] In Amarillo, Texas, for example, KGNC-FM – part of a newspaper-radio combination – is the only music-format station that presents regular local news programming.[2]

Bonneville also noted the importance of continuing the long standing exemption from the multiple ownership limits applicable to noncommercial educational broadcast stations set forth in Section 73.3555(f) of the Commission's rules.

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[1] *See, e.g.*, Comments of Newspaper Association of America, MM Docket Nos. 01-235, 96-197 at 22-38 (Dec. 3, 2001) (providing numerous examples of radio stations in newspaper combinations that provide award-winning news and information programming).
[2] *See* Comments of Morris Communications Corporation, MM Docket Nos. 01-235, 96-197 at 10 (Dec. 3, 2001).

Pursuant to section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Copies of this letter are also being sent electronically to Commissioner Abernathy and Ms. Robinson.

Respectfully submitted,

/s/

Kenneth E. Satten

cc: Hon. Kathleen Q. Abernathy
Stacy Robinson