

May 20, 2003

Notice of Ex Parte Communication

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: MB Docket No. 02-277; MM Docket No. 00-244

Dear Ms. Dortch:

Yesterday, Jack Goodman, Karen Kirsch, and the undersigned met with Stacy Robinson to discuss the definition of radio markets and the television duopoly rule.

We re-emphasized the need for reform of the local television ownership rule to allow duopolies in medium and small markets, which have far smaller gross revenues per station than larger markets. We stressed that allowing lower-rated stations in medium and small markets to form duopolies would preserve these stations as viable entities and enhance their ability to compete with higher-rated stations. We also discussed various options for altering the FCC's current definition of radio markets, and reiterated concerns that the impact of imposing a geographic-based definition remained unclear, especially in smaller markets.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,



cc: Stacy Robinson