

IRWIN, CAMPBELL & TANNENWALD, P.C.

ATTORNEYS AT LAW
1730 RHODE ISLAND AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20036-3101
(202) 728-0400
FAX (202) 728-0354
<http://www.ictpc.com>

PETER TANNENWALD
(202) 728-0401 EXT. 105
ptannenwald@ictpc.com

July 20, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, DC 20554

**Re: Report of Oral *Ex Parte* Communications
MB Docket No. 04-228
Ways To Further Section 257 Small Business Mandate**

Dear Ms. Dortch:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, this is to report that **oral *ex parte* meetings** were held on July 19, 2004, by Warren L. Trumbly, President, Andrew Bopp, Executive Director, several other representatives of the **Community Broadcasters Association** ("CBA"), and counsel for CBA, with the following Commission personnel:

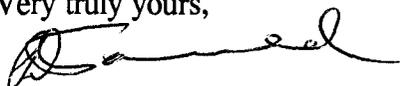
Commissioner Kathleen Q. Abernathy and Stacy Robinson Fuller
Commissioner Michael J. Copps and Jordan Goldstein
Commissioner Kevin J. Martin and Catherine Crutcher Bohigian
Commissioner Jonathan S. Adelstein and Johanna Mikes Shelton
Media Bureau: Roy J. Stewart, Chief, **Office of Broadcast License Policy**, and Barbara Kreisman, Chief, **Video Division**, and Mary R. Fitzgerald, Assistant Division Chief, Video Division

CBA made the following points: Class A and LPTV stations are almost all owned and operated by small businesses. Businesses actually operated by their owners are commonplace. Since Low Power FM Radio is a noncommercial service, encouraging Class A/LPTV development is perhaps the most effective way in which the Commission can bring more small businesses into the media industry. Restrictive application filing procedures impair our ability to develop our stations. Those stations with cable carriage rights are also seriously hampered by the interpretation that they may not require cable systems to accept alternative delivery methods. This interpretation creates a big problem when cable companies consolidate their

Marlene H. Dortch, Secretary
July 20, 2004
Page 2

head-ends at distant locations, such that a Class A/LPTV station that once delivered a strong enough over-the-air signal can no longer do so.

Very truly yours,

A handwritten signature in black ink, appearing to read "Peter Tannenwald", written in a cursive style.

Peter Tannenwald
Counsel for the Community Broadcasters Assn.

cc: (by e-mail) All Meeting Participants