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March 16, 2005

Ex Parte Communication

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20445

Re: MB Docket No. 04-256

Dear Ms. Dortch:

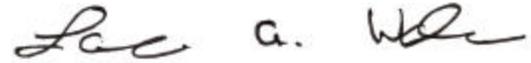
Yesterday, George E. DeVault, Jr., President of Holston Valley Broadcasting Corporation, and Valerie Schulte and the undersigned of NAB met with Deborah Klein, Mania Baghdadi, Debra Sabourin, Erin Dozier, Rebecca Fisher, Barbara Kreisman, Molly Fitzgerald, Clay Pendarvis, Roy Stewart, and Robert Ratcliffe of the Media Bureau to discuss the Commission's proposed rules and policies regarding the attribution of joint sales agreements in local television markets ("TV JSAs").

Specifically, we noted that the overwhelming majority of evidence in the record supports a Commission decision not to treat TV JSAs as attributable interests. We discussed the pro-competitive, public interest benefits of TV JSAs, in particular, for television stations located in smaller markets. Mr. DeVault described the benefits that Holston Valley's local television stations have incurred as a result of their JSAs. Finally, we explained that certain factors unique to the television industry counsel against altering the attribution status of TV JSAs at this time, including the fact that the Commission's television ownership rules remain in flux.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

**NATIONAL ASSOCIATION OF
BROADCASTERS**
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A handwritten signature in black ink, appearing to read "Larry Walke". The signature is cursive and somewhat stylized.

Larry Walke

cc: Deborah Klein
Mania Baghdadi
Debra Sabourin
Erin Dozier
Rebecca Fisher
Barbara Kreisman
Molly Fitzgerald
Clay Pendarvis
Roy Stewart
Robert Ratcliffe