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July 13, 2005

**Via Electronic Filing**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., TW-A325  
Washington, D.C. 20554

**RE: Standardized and Enhanced Disclosure Requirements for Television Broadcast  
License Public Interest Obligations, MM Docket No. 00-168**

Dear Ms. Dortch:

Pursuant to section 1.1206(b)(2) of the Commission's rules, we hereby submit this notice regarding an *ex parte* meeting in the above-referenced proceeding.

On Tuesday, July 12, 2005, representatives of the Public Interest, Public Airwaves (PIPA) Coalition met with members of the Media Bureau. PIPA Coalition members in attendance were: Gloria Tristani of the Office of Communication of the United Church of Christ, Inc.; Meredith McGehee of the Campaign Legal Center; Angela Campbell, of the Institute for Public Representation at Georgetown University Law Center, and Katharine Grincewich, of the United States Conference of Catholic Bishops. Members of the Media Bureau in attendance were Donna Coleman Gregg, Roy Stewart, Deborah Klein, Mary Beth Murphy, and Bill Johnson.

The PIPA Coalition urged the Commission to act promptly to issue a final report and order adopting meaningful disclosure requirements in Docket 00-168, as well as to issue a Notice of Proposed Rulemaking in Public Interest Obligations of TV Licensees, MM Docket No. 99-360. They noted that these proceeding have been pending for a long time and that the Commission had promised to complete the public interest obligations proceeding by the end of the year.

PIPA members summarized a proposed broadcast disclosure form which had been previously filed in this docket. *See, e.g.*, Letter from James A. Bachtell to Marlene Dortch, MM Docket No. 00-168 (May 14, 2004). Members of the PIPA Coalition noted that the current issues and programs lists in broadcasters' public files do not provide an effective means for the public or the

Commission to assess a licensee's performance. Because current disclosure requirements are so vague, information available in broadcasters' public files lacks consistency and detail. Thus, it is difficult to evaluate the amount and type of public interest programming a broadcaster carries. PIPA Coalition members stressed the importance of adopting a standardized disclosure form that requires licensees to respond to detailed questions about their public interest programming. PIPA Coalition members also urged that the Commission adopt rules requiring that disclosure forms and files be available not only at station offices, but on station websites.

The PIPA Coalition presented a copy of the proposed disclosure form and a memorandum discussing its constitutionality as well as proposed guidelines for public interest obligations and a memorandum addressing their constitutionality. All of these documents had been previously filed with the Commission. *See, e.g.*, Letter from James A. Bachtell to Marlene Dortch, MM Docket Nos. 03-15, 00-168, 99-360 (June 24, 2004).

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above referenced docket. If you have any questions regarding this filing, please do not hesitate to contact me at (202) 662-9535.

Respectfully Submitted,

/s/

Angela J. Campbell