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January 26, 2006

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; and Public Interest Obligations of TV Broadcast Licensees, MM Docket No. 99-360

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 proceedings.

On Wednesday, January 25, 2006, representatives of the Public Interest, Public Airwaves (PIPA) Coalition met with Heather Dixon, Legal Advisor on Media Issues for Chairman Kevin Martin. The Coalition urged the Commission to act promptly to issue a report and order adopting meaningful disclosure requirements in Docket 00-168, as well as to issue a Notice of Proposed Rulemaking following the Notice of Inquiry in Public Interest Obligations of TV Licensees, MM Docket No. 99-360. The Coalition also reminded Ms. Dixon that these proceedings have been pending for years, and that the FCC sought public input on the matter as early as 1995. *See Advanced Television Systems and Their Impact Upon The Existing Television Broadcast Service*, 10 FCC Rcd 10,540 (1995). On February 10, 2005, the FCC adopted a Second Report and Order in *Carriage of Digital Television Broadcast Signals*, 20 FCC Rcd 4,516 (2005) in which it stated:

Nothing in this Order diminishes the Commission's commitment to completing action on the multiple open proceedings on localism and on the public interest obligations of digital broadcasters. We believe the public interest and localism proceedings are essential components of the Commission's efforts to complete the transition to digital television.

The Commission intends to move forward on these decisions within the next few months and complete action in these dockets by the end of the year.

20 FCC Rcd at 4,537. The Coalition noted that the end of the year has passed without the FCC taking the promised action.

Coalition members noted that the current issues and programs listed in broadcasters' public files provide an ineffective means for the public or the Commission to assess a licensee's performance. Because current disclosure requirements are vague, information in broadcasters' public files lacks consistency and detail. Thus, it is difficult for either the FCC or the public to determine the amount and type of programming a broadcaster carries. Members stressed the importance of adopting a standardized disclosure form in which licensees would provide information about their public interest programming.

The Coalition provided a copy of a previously filed proposed draft disclosure form, dated June 18, 2004. It also provided a memorandum discussing the form's constitutionality. The Coalition also provided proposed guidelines for public interest obligations, dated April 7, 2004, 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). Further, the Coalition presented the recently submitted January 18, 2006 letter to Chairman Martin from Benton Foundation, Campaign Legal Center, Common Cause, New America Foundation, and Office of Communication of the United Church of Christ, Inc.

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, Marvin Ammori, and Lynn Rosenstock of the Institute for Public Representation, Katharine Grincewich of the United States Conference of Catholic Bishops, and Karen Menichelli of the Benton Foundation.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above referenced dockets. 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