

March 5, 2007



Marlene Dortch

Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of Oral *Ex Parte* Presentation
MM Docket No. 99-25 (LPFM Proceeding)

Dear Ms. Dortch:

On March 5, 2007, the undersigned ("Ms. Desai"), of Media Access Project, met with James Bradshaw, Deputy Chief (Engineering), Audio Division, Mass Media Bureau; Stephen Svab, Attorney, Video Services Division, Mass Media Bureau and Edna Prado, Electronics Engineer, Audio Division, Mass Media Bureau. At this meeting, the parties discussed some of the issues raised in the LPFM proceeding, specifically encroachment by full-power stations and the status of translators *vis a vis* LPFMs. .

With respect to encroachment on LPFMs by full-power stations, Ms. Desai explained the potential impact on existing broadcasting services if the recent wave of applications for community of license changes were to be granted. Specifically, Ms. Desai noted that a number of LPFM stations would suffer from a great deal of interference, while other LPFMs would be completely knocked off the air. The attached report was also presented to document the effect.

Ms. Desai suggested that the Commission adopt a policy that all applications for a community of license change should indicate whether any secondary services would be affected and that the Commission consider the impact on LPFMs when it grants an application for the modification. Ms. Desai also suggested the Commission adopt a policy whereby the Media Bureau will grant waivers to allow LPFMs to remain on the air upon a showing of minimal interference to the encroaching station.

Finally, Ms. Desai reiterated Prometheus' concerns with LPFMs having co-equal status with translators. She reiterated the concern that the wave of translator filings in March 2003 would greatly affect the number of LPFMs available and that no one entity should be allowed to file more than 20 applications.

Pursuant to Section 1.1206(b), 47 C.F.R. §1.1206(b) of the Commission's rules, this letter, with attachments, is being filed electronically with your office today.

Respectfully submitted,

/s/

Parul Desai

cc: Jim Bradshaw
Stephen Svab
Edna Prado