

March 9, 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 8, 2007, the undersigned (“Ms. Desai”), of Media Access Project, and Pete Tridish (“Mr. Tridish”) of Prometheus Radio Project met with Bruce Liang Gottlieb, Legal Advisor, Wireless and International, to Commissioner Michael J. Copps. At this meeting, the parties discussed some of the issues raised in the LPFM proceeding, specifically the status of translators *vis a vis* LPFMs and encroachment by full-power stations.

Mr. Tridish discussed the preclusive effect of translators on LPFMs. He suggested that LPFMs should be given primary status over distant translators and reiterated Prometheus’ suggested standards for determining primary status as found in Prometheus’ previous filings in this proceeding. The parties also discussed the effect of the third adjacent restriction on LPFM opportunities.

With respect to encroachment on LPFMs by full-power stations, Ms. Desai and Mr. Tridish explained the potential impact on existing broadcasting services if the recent wave of applications for community of license changes were to be granted. Specifically, they 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 and Mr. Tridish 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. It was 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.

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: Bruce Liang Gottlieb