

May 18, 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 May 17, 2007, the undersigned (“Ms. Desai”), Andrew Jay Schwartzman, and Harold Feld of Media Access Project, and Pete Tridish (“Mr. Tridish”) of Prometheus Radio Project met with Chairman Kevin J. Martin, Monica Desai, Chief of the Media Bureau, and Krista Witanowski of the Office of Strategic Planning and Policy Analysis. 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.

Mr. Tridish discussed the preclusive effect of translators on LPFMs. He suggested that LPFMs should be given primary status over distant translators. Alternatively, Mr. Tridish suggested priority should be determined by a pledge of local content origination. In other words, translators that repeat the signal of a station that locally originates at least 8 hours per day of local programming or 1 hour per day of locally produced news/public affairs programming would be primary to low power stations which do not meet this pledge.

With respect to encroachment on LPFMs by full-power stations changing their community of license, Mr. Tridish suggested that a change should only be granted if the affected LPFM has the opportunity to move elsewhere and the moving full-power station finances the costs of the move.

Finally, Mr. Tridish suggested that LPFM applicants be given the option of using the contour overlap method for finding available frequencies.

In addition to the points raised above, the parties discussed the arguments raised in previous filings related to this proceeding. Mr. Tridish also provided the parties with “Prometheus Recommended Solutions,” which was filed earlier in this proceeding, and the attached document.

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: Chairman Kevin J. Martin
Monica Desai
Krista Witanowski