

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)  
RM-11338 (Petition for Rulemaking of the National Association of  
Broadcasters)

Dear Ms. Dortch:

On May 18, 2007, the undersigned (“Ms. Desai”) of Media Access Project and Pete Tridish (“Mr. Tridish”) of Prometheus Radio Project met with Rick Chessen, Senior Legal Advisor, Media Issues, for Commissioner Michael J. Copps. 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. The parties also discussed concerns regarding the Petition for Rulemaking of the National Association of Broadcasters regarding AM broadcast stations operating FM translator stations.

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.

Mr. Tridish also 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 the LPFM proceeding. Mr. Tridish also provided the Mr. Chessen with “Prometheus Recommended Solutions,” which was filed earlier in this proceeding, and the attached document.

Finally, the parties discussed the issues raised by Prometheus in its filing in RM-11338. Mr. Tridish noted the impact to future LPFMs if AM broadcast stations were allowed to operate FM translator stations

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: Rick Chessen