

November 15, 2007



Marlene H. Dortch
Secretary
Federal Communications Commission
TW-A325
445 Twelfth St., SW
Washington, DC 20554

RE: Notice of Oral *Ex Parte* Presentation
MB Docket 06-121
MB Docket 02-277
MM Docket 01-235
MM Docket 01-317
MM Docket 00-244

Dear Ms. Dortch:

On November 14, 2007, the following individuals met with Commissioner Copps, Commissioner Adelstein, Scott M. Deutchman, Rudy Brioché, Katie Yocum and Scott Bergmann:

Mark Cooper, Consumer Federation of America
Casey Rae, Future of Music Coalition
Ed Mierzwinski, US PIRG
Mike Wassenaar, Alliance for Community Media
Anthony Riddle, Alliance for Community Media
Angela Campbell, Institute for Public Representation
Corrine Yu, Leadership Conference on Civil Rights
Cheryl Leanza, United Church of Christ Office of Communication, Inc.
Parul Desai, Media Access Project
Joseph Torres, Free Press
Ben Scott, Free Press
Beth McConnell, Media and Democracy Coalition
Gene Kimmelman, Consumers Union
Andrew Jay Schwartzman, Media Access Project.

The participants discussed the proposed rules governing newspaper/broadcast cross-ownership disseminated by the Chairman on November 13, 2007.

During the meeting, Mr. Scott, Mr. Schwartzman and Ms. Campbell discussed the vagueness of the proposed language. Joined by Mr. Cooper, they observed that the proposed "8 voices" test can be easily met in even small markets, and that it is irrelevant with respect to the top 20 markets. Thus, they reasoned, the inclusion of the "8 voices" standard underscored that the proposed rules contemplated that waiver applications from markets 21 and smaller would be common.

Mr. Cooper stressed that the proposed rules would have a particular adverse impact on minority ownership because about 1/3 of all minority owned TV stations are in the top 20 markets and all are number 5 or lower in their markets.

The parties also discussed whether the viability of newspapers in the top markets is threatened. Mr. Cooper argued that the impact of the internet is positive, at least for well managed properties, because better newspapers add internet viewers in numbers equal to or greater than any circulation losses. He pointed out that many metropolitan dailies are consciously trimming exurban circulation at the behest of local advertisers.

Respectfully submitted,

Andrew Jay Schwartzman

cc. (via email) Commissioner Copps
 Commissioner Adelstein
 Scott M. Deutchman
 Rudy Brioché
 Katie Yocum
 Scott Bergmann: