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November 19, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Notice of Ex Parte Communication
MM Docket No. 00-168; MB Docket No. 06-121

Dear Ms. Dortch:

On Friday November 16, Jane Mago, Ann Bobeck and the undersigned of NAB met with Commissioner Tate and Amy Blankenship to discuss proposals for standardized and enhanced disclosure requirements for television broadcasters. We stressed the practical difficulties and burdens, especially for smaller stations, associated with placing a station's entire public file on the Internet, and explained why a requirement to place the political file on the Internet was particularly problematic. We also emphasized the difficulties associated with implementing any such requirement on short notice, especially during the on-going digital television transition when the financial and personnel resources of stations were already severely burdened. Finally, we discussed some of the practical problems likely to arise for licensees and the Commission if program reporting requirements were altered to focus on specific program categories.

Ownership issues, including proposed revisions to the newspaper/broadcast cross-ownership rule, were also raised. We expressed the view that the proposal made public on November 13, 2007 did not constitute a radical change to the existing newspaper cross-ownership rule or existing waiver standards.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

Jerianne Timmerman

cc: Commissioner Deborah Taylor Tate
Amy Blankenship