

November 27, 2007



Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

RE: Docket 07-119

Notice of Oral *Ex Parte* Presentations

Dear Ms. Dortch:

The purpose of this notice is to memorialize several brief conversations between Commissioner Copps, Rick Chessen, Senior Legal Advisor to Commissioner Copps, and myself on November 27, 2007.

During the course of these discussions, I repeated arguments made in our pleadings pertaining to why Tribune Company and Samuel Zell should not receive any waivers of the Commission's newspaper/broadcast cross-ownership rules. I also argued that a waiver purportedly of finite duration but extending through subsequent litigation was in fact an open-ended waiver, and that the notion of basing waivers on the fact that a particular cross-ownership was grandfathered was fundamentally at odds with the rationale of the FCC's 1975 decision as affirmed by the Supreme Court. I also pointed out that Tribune and Zell had requested temporary, not permanent waivers.

Respectfully submitted,

/s/

Andrew Jay Schwartzman

cc. Commissioner Copps  
Rick Chessen