

December 12, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication
MB Docket No. 06-121; MB Docket No. 07-91; MM Docket No. 04-233

Dear Ms. Dortch:

Yesterday, Jane Mago and the undersigned of NAB met with Cristina Pauze to discuss a variety of issues, particularly ownership. With regard to the ownership proposal released on November 13, 2007, NAB stated its support for the elimination of the total ban on newspaper/ broadcast cross-ownership, but pointed out that the record in the quadrennial review proceeding would support a more extensive revision of the newspaper cross-ownership restrictions. We also stated that the proposal to make no changes to the existing television duopoly rule was inappropriate, given that the current rule had been found arbitrary and capricious by a reviewing court over five years ago and that the video marketplace had only become more competitive since that time.

We also discussed digital television. NAB, consistent with our comments filed in the third periodic review proceeding, called for the streamlining and revision of the Commission's proposed procedures for processing construction permits, maximization applications and new allotments so as to avoid the need for hundreds of individualized waiver requests.

On the question of localism, we discussed several proposals in the broadcast localism proceeding and expressed concern that proposals relating to program content raised serious First Amendment concerns.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

Jerianne Timmerman

cc: Cristina Chou Pauze