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December 17, 2007

BY ELECTRONIC FILING

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. 07-91

Dear Ms. Dortch:

On December 14, 2007, and on behalf of the Association for Maximum Service Television, Inc. ("MSTV"), I discussed the Third Periodic Review with Monica Desai of the Media Bureau. This conversation took place over the phone. We discussed the concerns that broadcasters have with respect to the Third Periodic Review, focusing on the need for flexibility as the hard-date for the transition nears.

I highlighted the concern that complexity and rigidity in the technical and procedural rules to be established in this proceeding could cause delays for broadcasters and for the Commission. For example, regarding the hundreds of broadcasters who are returning to their analog channels for post-transition operations, I pointed out that many of these broadcasters desire to use their analog antennas (and antenna patterns). Post-transition use of NTSC antennas will help to optimize digital television service and alleviate equipment and other resource shortages. Relief in the form of individual waivers of coverage and interference rules, however, could cause delays in many instances. Consequently, I urged that streamlined, flexible rules and procedures will provide the best path forward for broadcasters and the FCC as February 17, 2009 approaches.

Sincerely yours,



Jonathan D. Blake

Counsel to MSTV

cc: Monica Desai