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

November 20, 2007

Re: Notice of *Ex Parte* Presentation

2006 Biennial Ownership Review et al.

MB Dkt. Nos. 06-121, 02-277, 04-228; MM Dkt Nos. 01-235, 01-317, 00-244

Localism Inquiry, MB Dkt. No. 04-233

Dear Ms. Dortch,

This letter is to advise you, in accordance with Section 1.1206(b) of the Commission's rules, that on December 14, 2007, Ben Scott, Derek Turner, and Marvin Ammori of Free Press; Mark Cooper of Consumer Federation of America; Gene Kimmelman of Consumers Union; Andrew Schwartzman of Media Access Project and Angela Campbell of the Institute for Public Representation spoke by phone with Commissioner Jonathan Adelstein; Rudy Brioche, legal advisor to Commissioner Adelstein; and Rick Chessen and Bruce Gottlieb, legal advisors to Commissioner Copps.

Most of the discussion focused on the Chairman's cross-ownership proposal and how to negotiate a solution that would serve the public interest. We discussed the media ownership proceeding, the localism docket, and minority ownership proposals, in light of potential negotiations among the Commissioners on these items, hopeful the Commissioners could reach consensus on many issues. We believe that our filings on Dec. 11, 2007 describe concrete ways to remedy ambiguities in the Chairman's proposal; they also help the Commission understand which markets and outlets are at stake in these negotiations.

We primarily discussed the Chairman's cross-ownership proposal and ways to now address its potential loopholes. We emphasized the arguments made in the Dec. 11, 2007 filing by Free Press, CFA, and CU, such as those found on page 25, detailing how many markets would be subject to the proposal if only news voices were counted, as well as arguments in the filing by United Church of Christ. We also argued that, if the DMA is used as a unit of analysis, we must ensure that the counted broadcast voices actually overlap, and must ensure that the concentration analysis or voice-count properly account for the large number of non-competing, local community, newspapers. We also discussed concentration analysis and a potential top-4 limitation, along the lines of the information made in our comments, on how definition of these issues will affect many markets. We also emphasized our proposal that cross-ownerships involving television stations currently without news programs are more likely to serve the public interest. We also proposed public notice of cross-ownership acquisitions and a way to require more immediate review than waiting until license renewal.

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We discussed minority ownership proposals and the benefits of adopting the proposals before or after having defined eligible entities. We argued that the Commission should not now adopt a definition, and opposed using the small business definition. Once again, we urged the Commission to begin with a full census of female and minority ownership.

Finally, we discussed localism initiatives, including alternative mechanisms of enforcement related to the license renewal process.

Sincerely,
Marvin Ammori