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May 14, 2008

ORIGINAL

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

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Federal Communications Commission
Office of the Secretary

Re: Ex Parte Filing
MB Docket No. 04-233
MM Docket No. 00-168
MM Docket No. 00-44
CS Docket No. 98-120

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the FCC's Rules, this letter is submitted, in duplicate, to advise you that on May 12, 2008, John Lawson, Executive Vice President, Policy and Strategic Initiatives, ION Media Networks, Inc. met with Rick C. Chessen, legal advisor to FCC Commissioner Michael J. Copps to provide information and discuss certain FCC proceedings.

During the meeting, Mr. Lawson updated Mr. Chessen on the investments that ION has been making in quality programming. He also reported on ION's actions to serve underserved audiences, including the creation of a programming block oriented to African-Americans. He expressed ION's appreciation for Commissioner Copps' support of FCC action to approve ION's license transfers and change of ownership last December. The new ownership made the investment in quality programming possible, he reported.

Mr. Lawson also reported on the progress of ION's two 24/7 digital multicast channels, the *qubo* children's programming service and *ION Life*, which includes health and wellness programming. Mr. Lawson had previously sent Mr. Chessen the nutritional guidelines adopted by *qubo* that advertisers on the service must follow. This commitment followed service by ION Chairman and CEO Brandon Burgess on the FCC's Task Force on Media and Childhood Obesity.

Mr. Lawson pointed out that despite the strong public interest nature of *qubo* and *Life*, very few cable and direct broadcast satellite customers were able to see them on

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their systems, even on "family tiers." Mr. Lawson noted that *qubo* is the only free, over-the-air children's television service distributed nationally by public or commercial television broadcasters, but most of the public could not see it. *ION Life* is helping to address the nation's heath care crisis. Even though ION is committed to pro-social programming, Mr. Lawson noted that at some point ION must question whether or not *qubo* or *Life* merit continued investment by ION if carriage on cable and satellite systems remains so limited. Lawson inquired about future proceedings or other avenues to encourage cable and DBS operators to carry *qubo* and *Life*.

Mr. Lawson also reported on ION's current local programming and that, as ION began returning to financial health, the network was exploring innovative ways to expand its services to local communities. Regarding the current broad localism proceedings, Mr. Lawson stressed the importance of the FCC's proceeding carefully and deliberately before adopting any new regulatory requirements on free over-the-air broadcasting. He reiterated ION Media's concern with the impact of several of the proposed new regulations on the operation of its television stations. These views were consistent with the Comments that ION Media has filed in the localism proceeding.

In addition, Mr. Lawson pointed out that while Ion Media supports the FCC's goals of making information about broadcasters more easily accessible by members of the public, the rules and requirements recently adopted in the enhanced disclosure proceeding would impose unnecessary burdens on broadcasters and will delivery few public interest benefits. These concerns are reflected in the Petition for Reconsideration that ION Media recently filed with the FCC. Mr. Lawson suggested that a more flexible approach to reporting would better serve the public interest.

Finally, Mr. Lawson reported on ION's support and leadership of the Open Mobile Video Coalition and the aggressive schedule that the coalition was pursuing to introduce a broadcast-delivered mobile video service for consumers.

Sincerely,

William L. Watson
Vice President
ION Media Networks, Inc.

cc: Rick C. Chessen