

May 22, 2008

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



Re: *Ex Parte* Notice
MM Docket No. 04-233 (Localism Proceeding)

Dear Ms. Dortch:

On May 21, 2008, the undersigned (“Ms. Desai”) of Media Access Project and Carol Pierson (“Ms. Pierson”) of National Federation of Community Broadcasters (“NFCB”) met with Elizabeth Biley Andriou with the office of Chairman Kevin J. Martin. On May 22, 2008, Ms. Desai and Ms. Pierson also separately met with Cristina Chou Pauzé, Legal Advisor, Media Issues, to Commissioner Robert M. McDowell and Rick Chesson, Senior Legal Advisor, Media Issues, for Commissioner Michael J. Copps. On May 22, 2008, Ms. Pierson also separately met with Rudy Brioché, Legal Advisor, Media Issues to Commissioner Jonathan S. Adelstein and Amy Blankenship, Legal Advisor to Commissioner Deborah Taylor Tate. At this meeting the parties Ms. Pierson stated her support of the Commission’s intention to increase localism in communities. In addition, Ms. Pierson made some suggestions to minimize any burden community broadcasters could face.

In particular, Ms. Pierson stated her support of the main studio waiver rule. However, she suggested that any station operating under a main studio rule should be required to provide evidence that the station is responsive to the needs of the community of license (“COL”). For instance, stations could provide evidence of minimum hours of program origination in the COL, stations could hold board meeting in the COL, or stations could have board members who live in the COL

Additionally, with respect to enhanced disclosure, Ms. Pierson suggested that to alleviate the burden on community broadcasters, the Commission could limit filing requirements if the radio station meets certain minimum levels of programming, such as, providing eight hours of locally produced programming per day or ten hours of news and public affairs programming per week. Stations could also be required to keep program guides in their files and on their websites, if they have one.

Ms. Pierson also suggested that rather than prohibit any unattended operations, the Commission could mandate certain requirements that will ensure the community will be served in times of an emergency, such as, automatic compliance with EAS or station designation of point person for contact in an emergency. There could also be a limit to how many hours per day the station can be unattended.

Finally, with respect to community advisory boards, Ms. Pierson noted that many of the NFCB member stations already comply with the Corporation for Public Broadcasting's requirement for a community advisory board. Ms. Pierson further suggested that the Commission could require stations in a market to individually or collectively hold a minimum number of town hall meetings each year to hear from the community regarding issues of concern.

Pursuant to Section 1.1206(b), 47 C.F.R. §1.1206(b) of the Commission's rules, this letter is being filed electronically with your office today.

Respectfully submitted,

/s/

Parul P. Desai

cc: Elizabeth Biley Andrion
Rick Chessen
Rudy Brioché
Cristina Chou Pauzé
Amy Blankenship