



Mosaic Communications Partners, LLC
2919 17th Avenue, Suite 205
Longmont, CO 80503
(303) 678-1844

November 10, 2008

By Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Room TW-B204
Washington, DC 20554

Re: Written Ex Parte Presentation
MB Docket No. 07-57

Dear Ms. Dortch:

On behalf of Mosaic Communications Partners, LLC ("Mosaic"), we are writing to further elaborate on our previous filing and respond to Radio One's recent filing regarding the administration of the voluntary commitment of Sirius XM Radio, Inc. to provide a "Qualified Entity or Entities" rights to 4 percent of the full-time audio channels on its platforms.

By way of background, Mosaic Partners is owned by a group of experienced broadcasters and communications investors. Our investor group consists of several Qualified Entities who together represent African American, Hispanic and Native American ownership. Mosaic Partners seeks to become a lessee of these channels.

In Radio One's October 21st ex parte filing, Radio One advocated setting aside six channels (three on the XM and three on Sirius platforms) as "Super Channels". In order to meet the criteria for "Super Channels", Radio One has advocated that the applicant have "a national platform through ownership or operation of stations in at least 10 different geographic markets". In addition, Radio One proposed that of the six Super Channels awarded, two would be awarded to a Black owned Qualified Entity, two to an Hispanic owned Qualified Entity and two to an Asian owned Qualified Entity. This would exclude any other citizen who is a Qualified Entity from a different minority group from becoming a Super Channel Licensee. These two criteria proposed by Radio One would severely limit the pool of potential Qualified Entities that may apply and is counter to the purpose of creating the Qualified Entity channels. In contrast, Mosaic Partners believes the intent of the Qualified Entity channels was not to add more distribution to existing large radio operators. Rather, Mosaic Partners believes the Commission should encourage new entrants to participate. Mosaic recommended limiting the potential applicant pool to Qualified Entities that are also Small Disadvantaged Businesses ("SDBs") in order to open the door to new minority owned industry participants.

Radio One has also advocated that the "Six Remaining Channels" be leased in blocks of time. Under Radio One's proposal, the number of daily hours in a block will depend on the number of applicants. As proposed, if there are 36 applicants, each applicant would receive a 4 hour daily block. If the number of applicants is 72, each applicant would receive a 2 hour daily block. While

Marlene H. Dortch
November 10, 2008
Page 2

Mosaic Communications would like to see greatly enhanced Qualified Entity participation in the communications industry, Mosaic is concerned that this proposal will cause the lessee's business model to become uneconomic and doom the lessees to business failure. As we outlined in our October 7, 2008 ex parte filing, lessees must have "sufficient scale to generate interest from capital sources and programming sponsors while also amortizing operating costs." A group of lessees with two or four hour blocks, which is a very possible outcome under Radio One's proposal, will not be able to compete in an increasingly consolidated media market place. As a result, Mosaic supports the leasing of up to six channels to a Qualified Entity, in effect a "Super Channel" format, in order to ensure the economic viability of lessees and avoid uneconomic channel fragmentation.

We look forward to the Commission moving forward on rules that open this opportunity to SDB lessees only and ensure a viable Qualified Entity business model.

One copy of this written presentation is being submitted electronically pursuant to Section 1.1206(b)(1) of the Commission's Rules.

Sincerely,

/s/ Gloria Penn Easton
Gloria Penn Easton
Garden State Communications
Former owner of WWSI-TV Philadelphia

/s/ Zee Ferrufino
Zee Ferrufino
Latino Communications, LLC
Owner of KBNO-AM Denver