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DAVID J. FIELD  
PRESIDENT & CEO

June 29, 2009

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
c/o 9300 East Hampton Drive  
Capitol Heights, Maryland 20743

In re: MB Docket No. 08-187

Dear Sir or Madame:

Please accept this letter as a statement of our company's position with respect to the Federal Communications Commission's subject proceeding. We support Arbitron's Portable People Meter ("PPM") service, for the reasons set forth in this letter.

Entercom is one of the largest radio broadcasters in the United States with 110 radio stations in 23 markets. All of Entercom's stations subscribe to the Arbitron audience measurement service. Entercom subscribes to the PPM service in our markets where the service has been inaugurated and has committed to subscribe to the PPM service in our other markets that are currently scheduled to begin using the PPM methodology. In the markets not using the PPM methodology Entercom subscribes to the paper diary based service.

In today's highly competitive advertising environment, many of our important customers are demanding electronic audience measurement systems that provide them with richer, more timely and more detailed listener information. The PPM system is the best electronic radio audience measurement system currently on the market and is a product that we must adopt in order to satisfy our customers and remain competitive with other media.

We are confident that Arbitron is working to improve the service and will continue to do so in the future. If the FCC were to take steps that have the effect of discouraging PPM measurement as a technology, it would put radio at a considerable competitive disadvantage compared to other media that have embraced electronic audience measurement. Impeding the implementation of PPM would hurt radio economically at a time when we can least afford it. We urge the FCC to decline to further pursue its investigation of the PPM measurement system.

Sincerely,

David J. Field  
President & Chief Executive Officer

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