

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

Received & Inspected

JUL 27 2009

FCC Mail Room

In re: MB Docket No. 08-187

Dear 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.

As an advertising agency that has been in business for over 50 years employing over 200 people we rely heavily on radio to communicate information about our clients' brands. We are the largest advertising agency in the state of Oklahoma and as a privately held firm work to build our clients business and give back to the community through pro-bono programs and charitable causes. Ackerman McQueen has been an Arbitron client for over 15 years and in that time we have worked with the service to constantly evolve their measurement practices. We believe that while the diary method is a useful tool in gathering listener data it has become outdated in a world where messages reach consumers through so many different methods. The evolution to a real-time monitoring program is vital to ensure that businesses, particularly in tough economic times, have tools that allow them to communicate to the people who can most benefit from their product/service without inundating people who are not viable customers with messages that they not wish to receive.

In contrast to the diary method for recording and reporting radio station audience listening behavior, the PPM data gives us a much more detailed and current insight into that behavior; for example, we can track a panelist's tune-in/tune-out conduct on a minute-by-minute basis, which allows us to evaluate the attractiveness of very specific types of programming to listeners representing a variety of ages and demographic backgrounds of both genders. This is preferable to self-generated reports from diary-keepers, who do not always faithfully record their actual listening experiences, whether from misremembering, or writing down what they usually listen to but what they in fact didn't listen to on that particular occasion, or for other reasons.

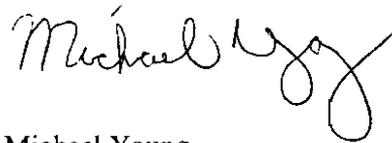
Using the Arbitron PPM data, our agency has found that we have been able to: gain much more insight as to when to run ads, which stations are more appropriate for our clients and in general be more cost effective with their funds. The higher level of data accuracy has also encouraged clients to invest at more robust levels than they have in the past.

In today's fragmented media market, our advertisers are hoping to keep pace with the consumer in real time, but radio tended to lag compared to other media with a 6 month delay in radio performance with the paper and pencil diary system.

No. of Copies rec'd 0
List ABCDE

The PPM methodology has its areas for improvement, but Arbitron is working to iron out the wrinkles. If the FCC were to take steps that have the effect of discouraging PPM measurement as a technology, it would be a disservice to our industry.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Young". The signature is fluid and somewhat stylized, with a large loop at the end of the last name.

Michael Young
Executive Vice President
Corporate Media Director