

For Electronic Filing

July 30, 2009

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

Re: MB Docket No. 08-187

Dear Ms. Dortch:

I am writing on behalf of Lincoln Financial Media Company ("LFM"), in response to the Federal Communication Commission's request for reply comments concerning the commercial use of the radio audience measurement Portable People Meter ("PPM") device, developed by Arbitron, Inc. ("Arbitron").

LFM owns and operates fourteen radio stations in four U.S. markets. All of our stations are subscribers to the PPM service. We also were long-term subscribers to Arbitron's paper diary-based methodology, prior to the debut of the PPM service in our markets.

It is our belief that, while not perfect and still needing improvements in both minority and non-minority measurement areas (efforts for which are currently underway), the PPM-based system represents an important step forward in audience measurement from the previous methodology and plays a significant role in addressing the demands from clients who support our businesses. Among the reasons for our position:

- The PPM methodology is based on "at-that-moment" electronic monitoring and is a more accurate reflection of actual listener exposure to stations, as opposed to the diary methodology, which largely reflects the recording of perceived/recalled listening and, as a result, often shows overstated amounts of listening.
- The PPM offers more immediacy of information and more discrete level data for our advertisers. Ratings results are released sooner than under the diary system, covering time periods that are more immediate and offering more granularity and opportunity for accountability. Many of our advertising customers are demanding these components, and our businesses need them in order to keep pace with other types of media.

Don Benson

President and Chief Executive Officer

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On the issue of the FCC's right to investigate PPM methodology, we respectfully submit that the FCC lacks both the authority and expertise to do so and that such a move would represent the Commission's stepping outside its area of jurisdiction.

It is our view that electronic measurement is essential for our industry to remain competitive, and the PPM methodology – even with its areas of needed improvement – embodies audience measurement progress that is essential for our businesses to remain relevant to our clients.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Benson". The signature is written in a cursive, slightly slanted style.

Don Benson
President & Chief Executive Officer