



October 29, 2009

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

RE: MB Docket Nos. 07-294; 09-182

Dear Ms. Dortch:

On October 28, 2009, Senator Gordon Smith, President and Chief Executive Officer of the National Association of Broadcasters (NAB), Steven W. Newberry, President and CEO of Commonwealth Broadcasting Corporation and NAB Joint Board Chair, and Jane Mago, Executive Vice President and General Counsel of NAB, met with Chairman Julius Genachowski, William Lake, Chief, Media Bureau, and Sherrese Smith, Legal Advisor to the Chairman.

In the course of the meeting, the parties discussed differing views on the subject of broadcast ownership. Senator Smith expressed his view that the FCC's ownership rules should enable broadcasters to hold reasonable combinations of media properties so that they can continue to provide programming to meet the needs of the communities they serve. This is particularly important to promote and preserve quality journalism through economies of scale. He emphasized the important role that broadcasters play in local markets.

In addition, Senator Smith expressed the view that the best way to have greater diversity of ownership was to improve access to capital. In this regard, he explained that a return of the use of tax incentives as a way to attract capital was important and that NAB and the FCC should urge that such programs be adopted.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jane E. Mago", written in a cursive style.

Jane E. Mago
Executive Vice President and General Counsel
Legal and Regulatory Affairs