



November 19, 2009

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

Re: *Ex Parte* Notice (MB Docket No. 07-294)

Dear Ms. Dortch:

On Wednesday, November 18, 2009, Greg Lewis, Associate General Counsel, National Public Radio, Malena Barzilai, Senior Counsel, Association of Public Television Stations, John Crigler, Garvey Schubert Barer, representing the Station Resource Group and Pacifica Foundation, and the undersigned met with Media Bureau Chief William Lake, Robert Ratcliffe, Mania Baghdadi and Kristi Thompson, all of the Media Bureau, to discuss concerns regarding new ownership reporting requirements.

Specifically, the parties expressed concerns about the new FCC Form 323 and the requirement that any person or entity holding an attributable interest in a broadcast station obtain a Federal Registration Number (FRN), which requires submission of a Social Security Number. The use of Social Security Numbers raises significant privacy concerns and administrative burdens. The parties further advised against extending this requirement to noncommercial stations, who currently file FCC Form 323-E. Such a requirement raises unique privacy issues and administrative burdens for noncommercial broadcasters. Finally, the parties reiterated their concerns about imposing new, onerous reporting requirements on NCE licensees when the FCC has not yet concluded what "ownership" means in the noncommercial context. The parties stressed that there are fundamental differences between equity ownership in the commercial sector and governance in the noncommercial sector.

This notice is filed pursuant to Section 1.1200, et seq., of the Commission's rules. A copy has been delivered via electronic mail to the meeting participants.

Please direct any questions you may have to the undersigned at 202-513-2744.

Sincerely,

Julie M. Kearney /s/

Julie M. Kearney
Director of Public Policy and Legislation