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January 8, 2010

By Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Ex Parte Presentation of the PPM Coalition
in MB Docket No. 08-187

Dear Ms. Dortch:

The PPM Coalition would like to draw the Commission's attention to the attached article, which was published in "Inside Radio" on Thursday, January 7, 2010. The article recounts the reaction of John Dickey, Chief Operating Officer of Cumulus Media, Inc. ("Cumulus"), to recent press reports of progress allegedly being made by Arbitron, Inc. in improving the sample performance of its Portable People Meter ("PPM") surveys.

Although Cumulus programs to general radio audiences, Mr. Dickey notes some of the same problems that members of the PPM Coalition have experienced with radio stations that target minority audiences. He believes that Arbitron's recent reports of improvements are "glossing over the real issues." Mr. Dickey notes that PPM surveys display "wobbles" that don't reflect consumer behavior, but are caused by a woefully low sample size. He noted that Arbitron has resisted using a 100% address-based sampling methodology, which would help capture more minorities as well as improve the representation of cell-phone-only households. Although Arbitron claimed that it is making progress in improving PPM sample performance, its samples fall far short of the government estimates of the percentage of U.S. households that have disconnected their landline phones.

“The only thing that matters is the quality of the sample and the sample size,” according to Mr. Dickey. It’s important that stations get a far more factual, accurate ratings report. The PPM Coalition shares Mr. Dickey’s observations.

Sincerely,

A handwritten signature in black ink, appearing to read "D.H. Pawlik". The signature is fluid and cursive, with a long horizontal stroke at the end.

David H. Pawlik
Counsel to the PPM Coalition

attachment

cc: Chairman Genachowski
Commissioner Copps
Commissioner McDowell
Commissioner Clyburn
Commissioner Baker
Sherrese Smith
Rosemary Harold
Jamila Bess Johnson
Joshua Cinelli
Rick Kaplan
Bradley Gillen
Bill Lake
Bob Ratcliffe
Mania Baghdadi
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Thursday, January 7, 2010



THE MOST TRUSTED NEWS IN RADIO

Fewer ratings periods and larger samples may be one solution to the ratings debate. Cumulus COO John Dickey believes Arbitron pronouncements this week that it's making progress in improving PPM sample performance is glossing over the real issues. "The only thing that matters is the quality of the sample and the sample size," Dickey says. He believes Arbitron has been too slow to add cell phone-only households. Despite accelerated timetables, Arbitron samples still fall short of government estimates of the percent of U.S. households that have disconnected their landline. He says Arbitron has also resisted using a 100% address-based sampling methodology in markets outside of Houston, even though it would help capture more CPOs and minorities. Dickey says the result is what amounts to quota sampling and ratings bounce. "Wobbles are not about consumer behavior but a woefully and inadequately low sample," he says. Since there are financial constraints to how much owners are willing to pay to increase the base of diarykeepers and PPM panelists, Dickey thinks the time has come for the industry to reduce the number of times it measures listening and allocate resources to a larger sample. "I'd rather get ratings once or twice a year and get a far more accountable tool," he says. With results from two small market Nielsen surveys, he says there's evidence a large sample size can eliminate the wobbles plaguing diary markets. "The listening and consumption patters aren't changing so drastically that we have to survey every three months," Dickey says. "Our Nielsen deal wasn't a cost-savings for us. It's really about quality. Stations will save some money, but it's more important that they get a far more factual, accurate product back." Dickey's been pushing for an independent industry ratings czar for some time, and believes the current debate over ratings methodology makes the idea even timelier.



Lenders go after Black Crow Broadcasting, asking court to seize control. A cat may have nine lives, but a radio credit agreement appears to be limited to eight. Negotiations between Black Crow Broadcasting and GE Capital on a new credit agreement came to a surprising end for management, with the lenders going to U.S. District Court in Manhattan this week asking a federal judge to hand control of the company over to a trustee. According to court documents, Black Crow defaulted on its lending agreement last January after it failed to make a payment despite eight separate amendments dating back to 2004. GE Capital is currently owed \$38,886,250. Filings indicate it's moved to empty whatever cash was available in two banks used by Black Crow — Florida-based Capitol Bank and First Tennessee Bank. Black Crow executives were still reviewing the filing late yesterday and had no immediate comment. The company owns 19 FMs and seven AMs in Florida, Tennessee and Alabama. It has been considering offers for its assets for some time according to one radio executive who says his bid for a market was turned down despite what he believed was a "full" price. GE Capital is one of radio's largest lenders and has been reluctant to play hardball with owners, according to several companies who've done business with the firm. In asking the court for the stations be turned over to a receiver, GE Capital says it plans to sell the assets and claims Black Crow doesn't have "sufficient funds to continue operate their business."

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- » Music sales fall

Is Donny Osmond AC's answer to Ryan Seacrest or the next Whoopi Goldberg? Numerous entertainers from other media have crossed over to radio, some successfully, others not so much. Osmond, whose five-hour midday show for AC and classic hits stations debuts January 18 on roughly 60 stations, including outlets in Los Angeles, Raleigh and West Palm Beach, believes his strong work ethic will help him successfully make the transition. "I hit the road running when I was five



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