

August 28, 2010

VIA ECFS FILING

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commissions  
445 12th Street, SW  
Washington, D.C. 20554

RE: Notification of *Ex Parte* Communication  
MB Docket No. 09-182  
GN Docket No. 09-191  
GN Docket No. 10-25

Dear Ms. Dortch:

This is to advise you, in accordance with Section 1.1206 of the FCC's Rules, that on Thursday, August 26, I met with Amy Brett, Assistant Division Chief, Industry Analysis Division, Media Bureau, William Freedman, Associate Chief, Office of the Bureau Chief, Media Bureau, Sarah Whitesell, Associate Chief, Office of the Bureau Chief, William Kehoe III, Senior Counsel for Convergence, Competition Policy Division, Wireline Competition Bureau and Matthew Warner, Attorney Advisor, Wireline Competition Bureau, to discuss consensus policy positions of the Free Community Paper Industry on matters under consideration by the Commission. Copies of our Comments filed in the *2010 Quadrennial Review*, detailing the continued need for safeguards to preserve fair competition in the local media marketplace, along with our Comments in support of *Preserving an Open Internet* and those addressing a wider range of issues in the matter of the *Future of Media* were brought to the meeting, and served as the foundation of our conversation. I detailed the longstanding and ever-important role community papers play in their local media ecosystems, noting that decades of macro and micro-level consolidation in print should be studied along with that in broadcast to provide ample predictive evidence counter to efficiency rationales floated by opponents of newspaper/broadcast cross-ownership safeguards, and suggested that particular attention be paid to the critical distinctions between real places like municipalities and their artificial, distortive, proprietary namesakes rendered by Nielsen as DMAs. I concluded that the worst possible outcome for our industry, the truly local communities they serve and the greater public interest, would be the widespread formation of outsized cross-media entities leveraging traditional advantages, while also given the ability to acquire game-ending digital advantage by way of prioritized content delivery on a closed, proprietary and discriminatory internet.

As required by Section 1.1206(b), as modified by the policies applicable to electronic filings, an electronic copy of this letter is being submitted in each of the above-referenced dockets.

Respectfully,

Jim Haigh  
Government Relations Consultant  
Mid-Atlantic Community Papers Association  
Association of Free Community Papers

cc (by email):

Amy Brett  
William Freedman  
Sarah Whitesell  
William Kehoe III  
Matthew Warner