

October 7, 2010

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554



Re: Notice of *Ex Parte* Presentation
GN Docket No. 10-25 (Future of Media and Information Needs)
MM Docket No. 99-25 (Creation of Low Power Radio Service)

Dear Ms. Dortch:

On Wednesday, October 6, 2010, Brandy Doyle and Pete Tridish of Prometheus Radio Project ("Prometheus"), accompanied by the undersigned counsel to Prometheus, met with Steven Waldman, Senior Advisor to Chairman Genachowski, and Sherille Ismail, Senior Counsel in the Commission's Office of Strategic Planning and Policy Analysis, to discuss matters in the above-captioned dockets.

The Prometheus representatives reiterated positions taken in the organization's filing in GN Docket No. 10-25, illustrating the manner in which low power FM stations today already act as media outlets far more engaged with and responsive to local needs than are many other types of broadcast and non-broadcast outlets. Community-run radio stations can and do provide a voice for typically underserved populations in both rural and urban areas. They also can serve as a foundation for building digital media infrastructure that further extends the reach and the benefits of community-oriented radio stations. As a result, the Prometheus representatives discussed potential engineering and license assignment policies that would enable the Commission to expand opportunities for LPFM stations in a range of geographic areas and markets of all sizes, including in the largest metropolitan markets, where LPFM availability has been severely limited by a combination of factors.

The Prometheus representatives also discussed a revised Memorandum of Agreement Regarding LPFM/FM Translator Priorities ("MOA") between Educational Media Foundation and Prometheus, filed in MM Docket No. 99-25 on September 22, 2010. To provide additional information regarding the issues discussed in the MOA, the Prometheus representatives discussed a study prepared by the advocacy organization Common Frequency, likewise filed MM Docket No. 99-25 under separate cover on September 28, 2010. Both the revised MOA and the study (without the associated appendices) are attached hereto.

As the Prometheus representatives explained, the study suggests the detrimental impact on LPFM opportunities in most metropolitan areas that could be expected under a previously proposed cap for processing 2003 FM Translator Window applications. That cap also could result in rural populations and other underserved areas not receiving radio service if and when translator applicants chose to forgo protection of applications in such sparsely populated areas. Such a result would not promote localism and diversity or serve the public interest, and therefore

Marlene Dortch
October 7, 2010
Page 2

would fail to serve the information needs of communities. The Prometheus representatives highlighted proposals in the MOA designed instead to promote local service and diversity of voices in all radio markets.

We submit this letter to the Secretary's office today pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b). Please contact the undersigned should you have any questions regarding this submission.

Respectfully submitted,

/s/ Matthew F. Wood

cc: Steven Waldman
Sherille Ismail