

July 1, 2011



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

RE: Notice of Oral *Ex Parte* Communication
MM Docket No. 99-25

Dear Ms. Dortch:

This notice is submitted in compliance with Section 1.1206(b) of the Commission's Rules.

On June 30, 2011, Andrew Jay Schwartzman and Elizabeth Ruiz of Media Access Project, and Brandy Doyle of Prometheus Radio Project met with Dave Grimaldi, Chief of Staff and Media Legal Advisor to Commissioner Clyburn, regarding Docket No. 99-25.

Mr. Schwartzman and Ms. Doyle discussed the history of the LPFM service and the circumstances surrounding the translator window which was opened in 2003, as well as the effect of the passage of the Local Community Radio Act of 2010 (P.L. 111-371) on LPFM and translator applications. They supported replacing the 10 application cap on translator applications currently in effect with a market-by-market analysis. They urged that any market-by-market floor on LPFM applications be made as high as possible. They also said that the so-called "Prometheus/EMF compromise" would be an acceptable approach, notwithstanding uncertainties it might create.

In addition, Mr. Schwartzman and Ms. Doyle discussed the complications which arise in allocating translators and LPFM authorizations because the two services have different technical criteria.

Mr. Schwartzman and Ms. Doyle also expressed a willingness to consider allowing AM stations to apply for FM translators because of the positive impact it would have on minority broadcasters.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew Jay Schwartzman". The signature is fluid and cursive, written over a light blue horizontal line.

Andrew Jay Schwartzman
Senior Vice President and Policy Director

cc. Dave Grimaldi