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July 20, 2011

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

Re: *Ex Parte Notice: Amendment of the Commission's Rules Related to Retransmission Consent MB Docket No. 10-71*

Dear Ms. Dortch:

In compliance with Section 1.206(b) of the Commission's rules, the undersigned submits this *ex parte* notice relating to the above-captioned proceeding.

On July 19, 2011, the undersigned, along with Claire Magee, Assistant General Counsel for Allbritton Communications Company, met with Commissioner Robert McDowell and his media advisor, Erin McGrath, to discuss the Retransmission Consent regime.

We reiterated the points made in previous filings with the Commission including, specifically, that the marketplace is working exactly as Congress and the Commission had envisioned with respect to payment for programming rights and that there is no need for the Commission to inject itself in these complex negotiations favoring either side.

In addition, we highlighted the consumer notice provision of the proceeding, noting the unintended, harmful consequences of requiring mandatory notice by broadcasters to viewers about potential blackouts. Those consequences include: (1) the sheer number of notices will become "background noise" to viewers rendering them both ineffectual and counterproductive; (2) viewers may become confused since there may be scores of MVPDs in a particular market, yet the notices would be seen by all viewers regardless of whether their carrier was even in negotiation with the broadcaster much less that there was a potential impasse; and (3) notwithstanding the First Amendment issues associated with mandatory programming, requiring stations to dedicate advertising inventory (potentially thousands of spots) to notices that may not be needed, places an undue financial burden on the stations.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above-referenced docket. Please contact the undersigned should you have any questions regarding this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jerald N. Fritz', is written over a horizontal line. The signature is fluid and cursive, with a large loop at the end.

Jerald N. Fritz

cc: Commissioner Robert McDowell