



December 15, 2011

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communication, MM Docket Nos. 00-168 and 00-44

Dear Ms. Dortch:

On December 13, 2011, Jane Mago, Erin Dozier and the undersigned of the National Association of Broadcasters (NAB) met with Bill Lake, Bob Ratcliffe, Kris Monteith, Sarah Whitesell, John Norton, Bobby Baker, Holly Saurer, and Hope Cooper of the Media Bureau and Greg Elin of the Office of Managing Director.

In the meeting, we discussed various issues raised by the Commission's *Order on Reconsideration and Further Notice of Proposed Rulemaking* proposing rules and procedures for placing TV broadcasters' public files into a Commission-hosted online database. Ms. Mago stated that NAB was still canvassing its members' views on the Commission's public file proposals, but noted that many members had expressed concerns that any plan to put the public file online should carefully weigh the costs and benefits of an online system.

Most of the discussion centered on proposed rules that would require TV broadcasters to place the contents of their political file – that portion of the public file that includes documentation on political advertising – into this new online database. We discussed with FCC staff some of the ways in which local TV stations currently manage, document and disclose the purchase of political advertising time. We noted that stations use a variety of both electronic and non-electronic methods. Stations also face a wide-ranging number of requests for political time depending upon such factors as the size of the market and the number of races in a given year. We explained that the methodology used by stations to track political advertising and volume of ad buys are some of the factors that will affect the potential burdens of an online political file.

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We also discussed how active consultation between broadcasters and developers of the FCC's filing system during the design phase could make the system more effective and less burdensome for broadcasters and the public.

Respectfully submitted,

A handwritten signature in black ink that reads "Scott Goodwin". The signature is written in a cursive, flowing style.

Scott Goodwin
Associate General Counsel
Legal and Regulatory Affairs

cc: Bill Lake, Bob Ratcliffe, Kris Monteith, Sarah Whitesell, John Norton, Bobby Baker, Holly Saurer, Hope Cooper, Greg Elin