

February 15, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20024

RE: Notice of Ex Parte Communication
MB Docket Nos. 00-168 and 00-44

Dear Ms. Dortch:

On February 13, I spoke by phone with Media Bureau Chief William Lake about the political file proceeding, and about a meeting I had a few days earlier with the broadcast station owners. The call followed on a similar conversation I had by phone with Chairman Genachowski on February 12.

I told them that on February 9, 2012 I met with a group of broadcast station owners, at their request, to discuss the proposed rule on the political file and sponsorship identification. I had heard their views on the proceeding and expressed my own (many of which I had already expressed in writing publicly in the FCC's Information Needs of Communities report and subsequent blog posts and commentary articles on CJR.org and Poynter.org).

In the conversations with Bill Lake and Chairman Genachowski, I emphasized the value of proceeding with online disclosure, and that it was most important that the public be able to easily identify the amounts of spending that TV stations receive from campaigns and issue groups during an election. I described the concerns that broadcasters have about cost burdens and their simultaneous stated desire to be constructive in approaching this issue. I expressed my view that the proposed rule was not burdensome to broadcasters (and indeed that in the long run it would likely save broadcasters time and money) but that it made great sense to consider alternative approaches that might be even more effective. And I gave my analysis of the pros and cons of various ways of proceeding. I also expressed my support for the idea that sponsorship identification disclosures be put online, as well as on air, and emphasized that efforts in this area should be sure to deal with "pay for play" situations in local TV newsrooms.

I do not represent the broadcasters. Though I was the lead author of the FCC report, I no longer work at the FCC, and I spoke to the FCC and with the broadcasters in my capacity as a private citizen.

This letter is being submitted electronically in the above-referenced docket, which has been granted permit-but-disclose status, pursuant to Section 1.1206(b) of the Commission's Rules.

Should you have any questions concerning this submission, kindly contact the undersigned.

Sincerely,

Steven Waldman
Senior Visiting Media Policy Scholar,
Columbia Journalism School

cc: Chairman Genachowski
William Lake