

February 28, 2012

VIA ELECTRONIC FILINGMarlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554**Re: Ex Parte Notice**
MM Docket No. 99-25, MB Docket No. 07-172

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's Rules, this notice of an ex parte conversation in the above-referenced proceeding is being provided. On February 20, 2012, the undersigned counsel; Joe Miller, Vice President for Signal Expansion at Educational Media Foundation ("EMF"); and Brian Gantman, In-House Counsel/Government Relations Director for EMF, met with Peter Doyle, Chief of the Audio Division of the Media Bureau in Nashville, Tennessee at the National Religious Broadcasters Convention.

The conversation concerned the issue that EMF has raised in several recent ex parte filings in this Docket, expressing its concerns over any proposed limits on the numbers of applications remaining from the 2003 FM translator window that can be processed once the Commission makes its determination in the above-referenced proceeding as to the priorities between LPFM and FM translator availability. EMF reiterated that any cap on application processing will harm rural residents, as applications that are pending for rural areas are more likely to be dismissed so that those applications serving greater populations can be prosecuted. Moreover, EMF noted that, if the cap is imposed on "applications that can be processed" rather than "grants that can be received," the number of new translator stations that any applicant will ultimately receive may well be far fewer than the number of applications that are selected for continued processing, as almost all pending applications are mutually exclusive with other applications. This further penalizes applicants who have a number of applications that remain pending, with no public interest reason for doing so.

A cap which applies only in LPFM spectrum-limited markets, where LPFM availability is more likely to be impacted, which is imposed on the number of grants in those markets as opposed to a cap on applications, is preferred, though EMF is opposed to all caps that do not allow a substantial number of the remaining applications from the 2003 window to be processed,

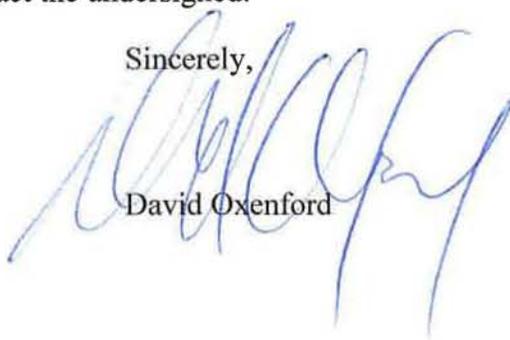
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especially those outside of spectrum-limited markets. EMF filed the legal challenge to the original application cap, and remains opposed to such retroactive limits on already-filed applications.

To the extent this notice is late-filed, a waiver is requested. As the meeting occurred at a remote location, and as certain parties involved in the meeting, including undersigned counsel, have been traveling for a substantial part of the intervening period, the preparation of this notice was delayed.

A copy of this notice is being filed in the relevant docket. Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read 'David Oxenford', is written over the typed name. The signature is fluid and cursive.

David Oxenford

cc: Peter Doyle