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

April 11, 2012

**Re:** *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, MB Dkt 00-168

Dear Ms. Dortch,

On April 9, 2012, I spoke via telephone with Sherrese Smith, Chief Counsel and Legal Advisor to Chairman Genachowski. The subject of the conversation was recent press reports regarding a draft Commission order requiring television broadcasters to replace their existing paper public inspection files with an online public file that would be hosted by the Commission. The item is tentatively slated for a vote in the Commission's April 27<sup>th</sup> Open Meeting.<sup>1</sup>

I expressed Free Press's continued support for the Commission's efforts to make broadcast television station public files and political files more transparent and accessible to the public and commended the Commission for moving forward on this long-overdue action to move these public files into the 21st century.

With regard to press reports suggesting that initial online posting requirements for broadcasters' political files would be limited to stations in the top 50 DMAs affiliated with ABC, CBS, FOX, NBC networks, I voiced concern that these criteria could inadvertently exclude online posting of political files by a number of highly ranked stations serving Spanish-speaking communities in these same markets. I urged the Commission to ensure that the item under consideration provides members of the public with equitable access to information about how and to whom broadcasters are selling political advertising time.

Finally, I conveyed Free Press's disappointment that, per press reports, the Commission had decided to exclude from the draft order previous proposals to require disclosure of broadcast shared services agreements and records of sponsored programming in the online public files. Such records would provide the public and the Commission with information it needs to ensure that local stations are not engaging in competitive abuses or outright violations of FCC rules.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above referenced docket. If you have any questions regarding this filing please do not hesitate to contact me.

Respectfully submitted,

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/s/

Corie Wright  
Senior Policy Counsel  
Free Press  
202-265-1490

Cc:  
Sherrese Smith

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<sup>1</sup> Public Notice, "FCC Announces Tentative Agenda for April Open Meeting, (Apr. 6, 2012) <http://www.fcc.gov/document/fcc-announces-tentative-agenda-april-open-meeting>.