



Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, NW | Washington, DC 20037-1122 | tel 202.663.8000 | fax 202.663.8007

Richard R. Zaragoza
tel 202.663.8266
richard.zaragoza@pillsburylaw.com

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VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communication Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20054

Re: **Ex Parte, MM Docket No. 00-168**

Dear Ms. Dortch,

The purpose of this ex parte notice is to report on a short, informal conversation I had with Commissioner Robert M. McDowell that occurred on April 17, 2012 during the NAB Las Vegas Convention. Also present was my law partner, Clifford M. Harrington.

I mentioned to Commissioner McDowell that many executives of the State Broadcasters Associations were pleased to have met the day before with Chairman Julius Genachowski and certain members of his staff and the Media Bureau, and that the subject of television stations being required to place their public inspection files, including their political time records, online was discussed at that meeting. I also told Commissioner McDowell that during the meeting with Chairman Genachowski, it was suggested that the Commission should consider issuing at its next Agenda Meeting an order and further notice of proposed rulemaking (i) bifurcating the political file aspect from the public file proceeding, and (ii) proposing to require cable systems to post their political time records on the Internet using the FCC's website. I emphasized to Commissioner McDowell the market distorting effect of exempting the cable industry from the Commission's proposal to require television broadcast stations to upload their political time files onto the Internet. I pointed out that the expanded public file obligations created by the Bipartisan Campaign Reform Act ("BCRA") expressly applied to cable systems. I mentioned that, while Section 315 of

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the Communications Act (the "Act"), which was modified by BCRA, states it applies to "broadcasting stations" and "station licensees," the definitions section of the Act (Section 315(c)) defined the terms "broadcasting station" to include a "community antenna television system" (cable system) and "station licensee" and "licensee" to include the operator of a community antenna television system. (That definition preceded BCRA and was not changed by that legislation.)

Please contact me if you have any questions.

Sincerely yours,

 /s/

Richard R. Zaragoza

cc: The Honorable Robert M. McDowell
Erin McGrath
(Via email)