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April 20, 2012

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Ex Parte Communication
MM Docket No. 00-168; MM Docket No. 00-44**

Dear Ms. Dortch:

The undersigned parties — including the National Association of Broadcasters, the ABC, CBS, NBC, Fox, and Univision television station groups, the television station groups that submitted a proposal to the FCC for these proceedings on February 15, 2012, and various State Broadcasters Associations, as described below — respectfully submit the attached proposal for the online political file issues pertaining to television stations that were raised in the above-captioned rulemaking. This proposal is a win-win solution that provides transparency concerning political candidate spending while avoiding the anti-competitive impact of online disclosure of per-spot rate information. Our proposal represents a common ground among us in an effort to provide the Commission with a specific proposal before the Sunshine Period goes into effect, but we would be willing to discuss questions or minor adjustments to this proposal with the Commission if it wishes to do so. We also would be willing to discuss ways of alleviating burdens on smaller market television stations and smaller television stations. We anticipate that the information required by Section 315(e) of the Communications Act would be available at the stations (or less information, if authorized by the FCC).

Our understanding is that the FCC's Order in this proceeding will apply the new requirements to certain television stations in the top markets at the outset and to other television stations after a significant interval. The proposal described herein would not change the Commission's phased-in implementation plans, which are intended to accommodate smaller stations and stations in smaller markets and Spanish language stations.

With respect to the State Broadcasters Associations (collectively, the "State Associations") which are parties to MM Docket Nos. 00-168 and 00-44, the law firm of Brooks Pierce McLendon Humphrey & Leonard LLP, which is counsel for the North Carolina, Ohio and Virginia Associations of Broadcasters, and the law firm of Pillsbury Winthrop Shaw Pittman

LLP, which is counsel for the group of the other forty-seven (47) State Associations, have both informed the undersigned (i) that they are recommending to the State Associations that they support the attached consensus proposal, (ii) that they are in the process of soliciting the approvals of those State Associations; and (iii) that they will notify the Commission of such approvals as soon as practicable.

Respectfully submitted,

/s/

Jonathan D. Blake, on behalf of:

Barrington Broadcasting Co.
Belo Corp.
Cox Media Group
Dispatch Broadcast Group
The E.W. Scripps Company
Gannett Broadcasting
Hearst Television Inc.
Meredith Broadcasting Group
Post-Newsweek Stations, Inc.
Raycom Media, Inc.
Schurz Communications Inc.

ABC Owned Television Stations

CBS Corporation

NBCUniversal Media, LLC and
NBC Owned Television Stations

Fox Television Stations, Inc.

Univision Television Group Inc.

National Association of Broadcasters

Attachment

cc: Chairman Genachowski
Commissioner McDowell
Commissioner Clyburn
William Lake
Holly Saurer
Sherrese Smith
Erin McGrath
Dave Grimaldi