



May 22, 2012

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

Re: Notice of *Ex Parte* Communication
CS Docket No. 98-120; MM Docket Nos. 99-25, 00-44, 00-168; MB
Docket No. 09-182

Dear Ms. Dortch:

On Friday, May 18, 2012, the undersigned, Christopher Ornelas, and Kelly Cole of the National Association of Broadcasters (NAB) met with Commissioner Ajit Pai and his Chief of Staff, Matthew Berry. The NAB staff explained NAB's positions on spectrum incentive auctions, implementation of the Local Community Radio Act (LCRA), on-line political files, extension of the Commission's requirement that hybrid cable systems make local television channels available to all their subscribers, availability of radio on mobile devices and broadcast ownership rules.

With regard to the above-captioned proceedings, the NAB staff noted our position that the FCC should recognize the careful balance that Congress struck in the LCRA. Specifically, the agency should not consider waiver of 2nd adjacent channel spacing for low power FM (LPFM) services except in very rare circumstances and should not raise the power levels for LPFM services. Regarding on-line political files, we reiterated our members concerns that requiring only television broadcasters to place their advertising rates in an on line database will create competitive harm for television stations and be far more burdensome than the Commission estimates.

On the subject of viewability of local must carry stations on hybrid cable systems, NAB stated that the requirement remains important for viewers and stations. The record shows that a substantial number of viewers can only see analog signals on these systems. Those viewers are often lower income families who cannot afford to upgrade or rent new equipment in order to see local stations. We further noted that the stations likely to be affected if the rule is not extended are those providing alternative programming such as religious and foreign language programming.

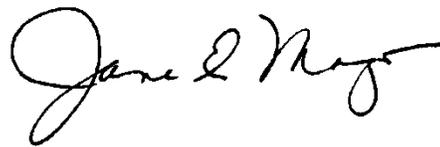
1771 N Street NW
Washington DC 20036 2800
Phone 202 429 5300

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NAB also briefly discussed our position that the current broadcast ownership rules should be relaxed to permit broadcasters to compete in the current marketplace.

Please direct any questions to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jane E. Mago". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

Jane E. Mago
Executive Vice President & General Counsel
National Association of Broadcasters

cc: Commissioner Ajit Pai, Matthew Berry