



October 26, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communication; MM Docket No. 99-25

Dear Ms. Dortch:

On October 25, 2012, Jane Mago, Kevin Gage, John Marino and the undersigned of the National Association of Broadcasters (NAB), met with James Bradshaw and Susan Crawford of the Media Bureau's Audio Division, to discuss issues regarding the above-captioned proceeding.

We discussed the status of two items in this proceeding concerning implementation of the Local Community Radio Act of 2010 (LCRA). Specifically, we discussed Section 3 of the LCRA, which prohibits the Commission from reducing the minimum second-adjacent channel distance separation requirements between low power FM stations and full-service FM stations, but permits waivers under certain circumstances. NAB expressed our view that such waivers should be considered only in truly exceptional circumstances, given the legislative history of the LCRA, and other provisions in the Act.

Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lawrence A. Walke".

Lawrence A. Walke

cc: James Bradshaw
Susan Crawford

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