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December 6, 2012

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

***Via Electronic Filing***

**Re: MB Docket No. 09-182, 2010 Quadrennial Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996; MB Docket No. 07-294, Promoting Diversification of Ownership in the Broadcasting Services**

Dear Ms. Dortch:

On December 4, 2012, and again on December 5, 2012, I spoke briefly by telephone with Dave Grimaldi, Chief of Staff and Media Legal Advisor to Commissioner Clyburn, regarding matters in the above-captioned dockets.

As Free Press and others have emphasized, before the Commission changes its media ownership rules, it must fully consider the impact of such changes on broadcast ownership opportunities for women and people of color. Until the Commission conducts and completes such an analysis properly, there can be no argument for relaxing the rules, and no justification for voting out an order that fails to comply with the Third Circuit’s directive on this point.

During both calls, I noted our appreciation for Commissioner Clyburn’s efforts to secure more time for comment on the Form 323 data released by the Commission on November 14, 2012. I stressed, however, that what are needed in addition to further study of the data itself are the Commission’s analyses of and reactions to that data in the context of the current review. Comment on the data may help to illuminate trends, but even more important under the court’s mandate is reasoned explanation of the Commission’s rationale for any rule changes it may adopt. Finally, I noted the growing chorus of popular and political opposition to the course of action charted and the rule changes reportedly made in the item on circulation.

We file this *ex parte* notice today, pursuant to Section 1.1206(b) of the Commission’s rules. If you have any questions regarding this submission, please do not hesitate to contact me.

Respectfully submitted,

/s/ Matthew F. Wood

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