



December 18, 2012

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

Re: Notice of Ex Parte Communication in MB Docket No. 09-182

Dear Ms. Dortch:

On December 14, Jane E. Mago, Jerianne Timmerman and the undersigned of the National Association of Broadcasters (NAB), met with Erin McGrath of the Office of Commissioner McDowell.

We reiterated NAB's support for modification of the broadcast ownership rules to reflect dramatic changes to the marketplace in which broadcasters compete for audiences and advertisers. Specifically, the record provides strong support for elimination of both the newspaper-broadcast and radio-television cross-ownership rules; for relaxation of the local television and local radio rules; and for the adoption of various proposals to promote diversity in broadcasting.

Consistent with our previous filings, we expressed concerns that attribution of joint sales agreements (JSAs) among television stations in the same market is not supported by the record, will be harmful to television stations and their viewers, and will undermine the Commission's longstanding goals of competition, diversity and localism.<sup>1</sup> We also discussed the need to adopt proposals that will enhance diversity

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<sup>1</sup> See, e.g., Letter from Erin L. Dozier, National Association of Broadcasters, to Marlene H. Dortch, Secretary, FCC (filed December 4, 2012) at 1-6.

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

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of broadcast ownership and reiterated our support for several proposals in the record.<sup>2</sup>

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "ERL Dozier". The signature is fluid and cursive, with the first name "ERL" being more prominent and the last name "Dozier" written in a more connected, flowing style.

Erin L. Dozier  
Senior Vice President and Deputy General Counsel  
Legal and Regulatory Affairs

cc: Erin McGrath

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<sup>2</sup> *Id.* at 6-8.