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February 6, 2013

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: Summary of the Ex Parte Meetings with Commissioner Ajit Pai and Representatives of the Media Bureau
GN Docket No. 12-268 and MB Docket No. 07-294

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission Rules, this notice of an ex parte presentation in the above-referenced matters is being provided. On February 4, 2013, Ben Downs, Vice President of Bryan Broadcasting Corporation, and Oscar Rodriguez, President of the Texas Association of Broadcasters (accompanied by undersigned counsel) held two separate meetings. The first was with Peter Doyle and Susan Crawford of the Audio Division of the Media Bureau. The second meeting was with Commissioner Ajit Pai and Matthew Berry, his Chief of Staff. The meetings were to discuss the Commissioner's proposals to study AM radio to determine how the service can be improved, and to broadly discuss areas that could be examined in connection with any such improvement efforts.

These conversations were broad ranging and not the result of specific policy proposals, but were instead meant to open a dialog to explore possible avenues for further study at the Commission and in private industry to advance the Commissioner's suggestions for AM improvement. As these conversations touched on topics discussed in the above-referenced dockets, this ex parte notice is being submitted.

In the conversations, it was made clear that Mr. Downs was speaking for himself and not as a representative of any other organization in which he is or has been involved. Texas Association of Broadcasters representatives were at the meeting for informational purposes and as the question of AM improvement is one of importance to its members, not to support any of the

specific actions being discussed. The discussion included the following:

- A discussion of the Tell City waiver request. Mr. Downs suggested that an expansion of the use of FM translators for AM stations will expand the life of the AM band until more fundamental changes can be made.

- A discussion of AM skywave interference and how a review of the protections provided to skywave interference may allow, in some cases, for waivers that would give some daytime AM stations relief, especially in AM drive-time hours.

- A discussion of the pending proposals to allow AM stations to migrate to the spectrum currently used for TV channels 5 and 6. As part of this discussion, Mr. Downs suggested that, in the upcoming repacking of the television spectrum, in connection with the Incentive Auctions, some thought be given to utilizing these channels, and possibly channel 4 as well, in a manner so as to maximize the potential use of these channels for AM users.

- A discussion of the potential of AM radio going all-digital at some point in the future.

In the meeting with the Media Bureau representatives, there were some other discussions about technical issues for AM broadcasting that have been raised by MMTC in other proceedings. Mr. Downs was generally supportive of these ideas.

In both meetings, Mr. Downs also explained that an across the board power increase for all AM analog stations would, according to a study of the IEEE, need to quadruple power of AM stations to overcome the current noise floor for AM stations and get back to the level of service of 1995. He explained some of the costs and other issues that would be involved in such an across the board power increase.

Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,

David Oxenford

cc: Commissioner Ajit Pai
Peter Doyle
Susan Crawford
Matthew Berry