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February 11, 2013

BY ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12 St. SW
Washington, DC 20554

Re: Ex Parte Communication in *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*,
MM Docket No. 00-168

Dear Ms. Dortch,

On February 7, 2013, Meredith McGehee, representing the Campaign Legal Center, Angela Campbell, Laura Moy, and law student Amber Robinson of the Institute for Public Representation, counsel to the Public Interest Public Airwaves Coalition (“PIPAC”), and Jennifer Yeh, representing Free Press, met with Bill Lake, Chief of the Media Bureau, Holly Saurer, Legal Advisor of the Media Bureau, Hope Cooper, Attorney in the Media Bureau Policy Division, Greg Elin, Chief Data Officer, Alison Neplokh, Chief Engineer of the Media Bureau, John Norton, the Deputy Chief of the Media Bureau Policy Division, Elizabeth Andron, Acting Chief Counsel for the Office of the Chairman, Lyle Elder, Legal Advisor to the Chairman, and by phone, Sherille Ismail, of OSP.

PIPAC stated that allowing television stations to upload only aggregated political file data while retaining the actual documentation at the station, as proposed in the petition for reconsideration filed by the Television Station Group, would not serve the public interest. First, allowing stations to post only aggregate data would be contrary to the Commission’s efforts to bring its reporting systems into the 21st century and to promote

transparency and data-driven policymaking. Second, it would make it very difficult, if not impossible, for the general public, journalists, academic researchers, and advocacy groups to obtain this information. The record already shows how costly and time consuming it is to obtain information from a station's paper public file. Third, without online access to the complete political file, it would be impossible to verify the accuracy of the aggregate figures. Finally, aggregated information is insufficient to ascertain whether stations are meeting their statutory obligations with respect to lowest unit rate, equal opportunities, and public disclosure of the sources of political ads.

Respectfully submitted,

/s/

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cc: all attendees (via email)