



August 26, 2013

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

Re: *Ex Parte* disclosure pursuant to 47 CFR § 1.1206(b) in MB Docket No. 09-182, MB Docket No. 07-294, BO Docket No. 12-30

Dear Ms. Dortch:

On August 22, 2013 the following individuals, who represent members of The Leadership Conference on Civil and Human Rights Media and Telecommunications Task Force, met with OCBO Chief, Tom Reed, as well as Daniel Margolis and Jonathan Levy. Attending the meeting were: Cheryl Leanza, United Church of Christ, OC Inc., Task Force Co-Chair; Jason Lagria and Jackie Iwata, Asian Americans Advancing Justice | AAJC; Mike Scurato, National Hispanic Media Coalition; and Todd O'Boyle, Common Cause.

We thanked the staff for the release of the excellent framework for studying community information needs pursuant to Section 257 studies and encouraged them to quickly incorporate our suggestions and approve the research framework. Specifically, we highlighted two refinements which we viewed as the most important to improve the studies, as described in the attached written comments. We believe the current framework is excellent and will give a strong foundation to Commission deliberation. We suggested the Commission consider taking action to 1) ensure information sources are not undercounted or duplicated; and to 2) ensure that in-depth neighborhood interview adequately represent people of color and women.

We underscored, in particular, that in an ideal scenario the study would use deliberative sampling which would select markets where some non-English and non-Spanish broadcast television stations would be captured. In addition, we noted the importance non-English weekly publications. We also cautioned the Commission about the measurement of Internet sites, highlighting the flaws in the counting of urls which led the Third Circuit to overturn the Commission's media ownership decision in 2003. In many cases, a researcher can point to many urls, but few of those are original reporting, many are portals that collect other news sources.

We described our interest in ensuring that the community interviews would capture the full range of data among underserved communities, particularly people of color and women. We noted, as we described in our written comments, that the identity of the interviewer is likely to impact any community interviews.

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We recognized that, within ordinary cost-constraints, no study will ever be perfect. We agreed that conducting the study to get the data was very important, and the study as proposed appeared fundamentally sound. We strongly encouraged the Commission to finalize the study framework and proceed to collect data in time for it to be used in the 2014 Quadrennial Review.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl A. Leanza". The signature is fluid and cursive.

Cheryl A. Leanza
Policy Advisor, United Church of Christ, OC Inc.
Co-Chair, Leadership Conference on Civil and Human Rights,
Media and Telecommunications Task Force