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November 13, 2013

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

***Via Electronic Filing***

**Re: MB Docket No. 13-50, Request for Clarification of the Commission's Policies and Procedures Under 47 U.S.C. § 310(b)(4)**

Dear Ms. Dortch,

Today, Wednesday, November 13, 2013, I spoke by telephone with Gigi B. Sohn, Special Counsel for External Affairs to Chairman Wheeler, to discuss issues in the above-captioned docket. This presentation during the Sunshine period was "requested by" Ms. Sohn "for the clarification or adduction of evidence." See 47 C.F.R. § 1.1204(a)(10)(iv). The presentation was thus exempt from the Sunshine period prohibition pursuant to Section 1.1203(a)(1) of the Commission's rules. We file this notice today in accordance with Section 1.1206(b)(2)(v).

During the call, I clarified Free Press's views on the Open Meeting agenda item regarding foreign investment in broadcast licensees and on Section 310(b) of the Act. As noted in our previous filing in this docket on November 7, 2013, we are chiefly concerned with preserving diversity and localism in broadcasting. To that end, no clarification of the procedures for reviewing proposed broadcast license transfers of control would change the applicants' burden to demonstrate that such transfers serve those goals and serve the public interest.

In our November 7th filing, we expressed skepticism about the purported benefits from increased investment in broadcast licensees by distant corporate owners. We suggested the possibility of diminished service to the community of license, and noted that such investment could flow more readily to large station groups than to diverse, single-station licensees. Nevertheless, Free Press does not oppose this item or Commission action to clarify that it reviews proposed transactions on a case-by-case basis.

Respectfully submitted,

/s/ Matthew F. Wood

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cc: Gigi B. Sohn