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February 26, 2014

VIA ELECTRONIC FILING

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

**Re: Notice of Ex Parte Communication, MB Docket No. 13-249, MB
Docket No. 09-182, BO Docket No. 12-30, and EB Docket No. 04-296**

Dear Ms. Dortch:

On February 25, 2014, the following persons met at the Commission's headquarters in Washington, DC with certain officials and staff of the Commission:

From the Nevada Broadcasters Association ("NBA"), Bob Fisher, President and CEO of the NBA, Adam Sandler, Vice President of the NBA, Board members Tony Bonnici of Lotus Broadcasting Las Vegas, Todd Brown of Fox 5 Vegas, Amie Chapman of KAME/KRXI TV Reno, Lawson Fox of KTVN-TV 2 Reno, Jerry Hadenfeldt of Meredith Corp., Lori Heeren of Reno Media Group, Aaron Kenneston of Washoe County Emergency Management, Craig Knight of KCEP-FM Las Vegas, Thom Porterfield of KTNV-TV 13 Las Vegas, Rodd Stowell of KWNA AM/FM Winnemucca, Dane Wilt of Lotus Radio Reno, and Richard R. Zaragoza, Scott R. Flick, and Carly A. Deckelboim, the NBA's Washington Counsel, met with the following:

From the Office of Commissioner O'Rielly, Commissioner O'Rielly and his Chief of Staff, Courtney Reinhard;

From the Office of Communications Business Opportunities, Thomas Reed, Director; Karen Beverly, Assistant for Management; Gilberto de Jesus, Attorney Advisor; Daniel Margolis, Attorney Advisor; and Calvin Osborne, Attorney Advisor;

From the Media Bureau, William Lake, Chief; and

From the Public Safety and Homeland Security Bureau, Lisa Fowlkes, Deputy Bureau Chief.

With respect to Revitalization of the AM Radio Service proceeding, MB Docket No. 13-249, the following points were presented:

1. The NBA noted the letter submitted by the fifty State Broadcasters Associations in MD Docket No. 13-249, and suggested the Commission utilize a triage approach to evaluating and implementing effective ways to revitalize AM radio. In particular, the NBA encouraged the Commission to act as soon as viable options are identified, rather than delay until all of the numerous options have been assessed in order to release a single Report and Order addressing all proposals examined in the proceeding.
2. The NBA agrees with the many commenters in this Docket who favor increased access by AM stations to FM translators.

With respect to media ownership rules relating to Joint Sales Agreements, MB Docket No. 09-182, the following points were presented:

1. The NBA emphasized that Joint Sales Agreements help to preserve jobs and broadcast service to the public, particularly for minority viewers that would often be deprived of service in the absence of such agreements. In addition, the cost efficiencies permitted by Joint Sales Agreements help stations to better serve their communities and allow station news staffs to investigate stories at a deeper level than would otherwise be the case.
2. If Joint Sales Agreements, despite their inability to provide attributable influence over a station, are nonetheless deemed an attributable ownership interest by the Commission, such an action would effectively ban them outright in most markets despite their public benefits.
3. In the event Joint Sales Agreements are attributed, the Commission should grandfather existing agreements, as forced termination of such agreements would harm the affected stations by substantially increasing costs and undercutting their ability to compete, leading to reduced programming and diversity, and potentially to total loss of broadcast service from those stations.

With respect to the Critical Information Needs study, BO Docket No. 12-30, the following points were presented:

1. The NBA is pleased that the Commission has decided to rethink the survey of newsrooms.
2. The State Associations plan to file a letter encouraging the Commission to eliminate the study in its entirety.

With respect to the Emergency Alert System, EB Docket No. 04-296, the following points were presented:

1. The NBA noted that Nevada is the first and currently only state where broadcasters are qualified by statute as “First Responders.”
2. The NBA noted that the flow of emergency information is being artificially constrained by wireless providers proactively taking steps to deactivate FM chips/software in their cell phone products, thereby preventing the public from having ready “off-air” access to emergency information from local radio stations, particularly where an emergency interferes with cellular service.
3. The NBA suggested adding a representative from one of the state broadcasters associations to the Commission’s committee assessing EAS system security and related issues in order to better facilitate the adoption and dissemination of EAS security best practices to stations through use of the Station Associations’ Alternative Broadcast Inspection Programs.

A member of the NBA also raised concerns regarding the impact of low power FM stations on the operation of FM translator stations.

Please associate this letter with the Commission’s files for the proceedings referenced above. If there are any question concerning this matter, please communicate with the undersigned.

Respectfully submitted,

/s/

Richard R. Zaragoza

cc: (via email):
The Honorable Michael O’Rielly, Commissioner
Courtney Reinhard, Chief of Staff, Office of Commissioner O’Rielly
Thomas Reed, Director, Office of Communications Business Opportunities
Gilberto de Jesus, Attorney Advisor, Office of Communications Business Opportunities

February 26, 2014

Page 4

Calvin Osborne, Attorney Advisor, Office of Communications Business Opportunities

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William Lake, Chief, Media Bureau