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March 12, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
455 12th St, SW
Washington, DC 20554

RE: *2010 Quadrennial Regulatory Review*, MB Docket No. 09-182

Diversification of Ownership in the Broadcasting Services, MB
Docket No. 07-294

Attribution of Joint Sales Agreements in Local Television Markets,
MB Docket No. 04-256

Dear Ms. Dortch:

On March 10, 2014, Andrew Jay Schwartzman and Angela Campbell of the Institute for Public Representation, counsel for Prometheus Radio Project, Office of Communication of the United Church of Christ, Inc. (UCC), and Media Council Hawai'i, met with Commissioner Rosenworcel and her Policy Director, Clint Odom.

In the meeting, Mr. Schwartzman and Ms. Campbell argued that there is ample record evidence upon which the Commission can take final action to address shared services agreements and similar arrangements, and to require immediate online disclosure of such agreements. They discussed the proposal of UCC, *et al.* set forth in their March 5, 2012 comments in Dockets 09-182 and 07-204. In those comments, at pages 15-23, UCC, *et al.* described a bright line attribution test based on seven *per se* criteria and eight variable criteria. The comments can be accessed at <http://apps.fcc.gov/ecfs/document/view?id=7021898383>.

Mr. Schwartzman and Ms. Campbell also called for the Commission to take action in response to the Third Circuit's remand in *Prometheus II* relating to socially and economically

disadvantaged businesses. In particular, they called for a staff analysis of the Commission's ownership data and the release of the data in a searchable format.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew Jay Schwartzman". The signature is fluid and cursive, with a prominent initial "A" and "J".

Andrew Jay Schwartzman

cc. Clint Odom