



March 26, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Communication in MB Docket Nos. 04-256, 09-182, 10-71

Dear Ms. Dortch:

On Monday, March 24, 2014, the undersigned spoke with Adonis Hoffman, Chief of Staff for Commissioner Clyburn, about the upcoming decision related to joint sales agreements among local television stations. I explained NAB's position that if the Commission moves forward to effectively prohibit television JSAs, it must have a clear path to preserve the public interest benefits that JSAs provide, as NAB and others have demonstrated in this record.

Specifically, I discussed the terms of the compromise position that NAB presented to Commissioner Clyburn in our letter of March 20, 2014. I explained that the terms we presented were intended to permit licensees to show that they retained *de facto* control of the station under the FCC's established standards of control over programming, personnel and finances. Our proposal also would allow licensees to demonstrate that the joint arrangements would further the public interest in localism and diversity.

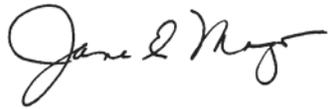
With regard to possible limitations on the term of a JSA agreement, I indicated that agreements for no more than the length of a license term (8 years) were reasonable. It, however, would be arbitrary to prohibit renewals of all such agreements because continuation of an agreement may be needed to maintain cost efficiencies and benefits.

1771 N Street NW
Washington DC 20036 2800
Phone 202 429 5300

Marlene H. Dortch, Esq.
March 26, 2014

I again stated NAB's position that waivers of the new JSA rule are not the best approach to serve the public interest. To provide greater certainty the Commission should create exemptions that do not create the delay and uncertainty inherent in the waiver process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jane Mago". The signature is written in a cursive, flowing style.

Jane Mago
Executive Vice President & General Counsel
National Association of Broadcasters

cc Adonis Hoffman