

October 25, 2017

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

*Re: Ex-parte presentation in WC Dkt. No. 17-108; MB Dkt. Nos. 17-179,  
14-50, 09-182, 07-294*

Dear Ms. Dortch:

On Tuesday, October 24, 2017, I spoke by phone to FCC Commissioner Brendan Carr.

We discussed Free Press' June 5 letter that called attention to our concerns about First Amendment and due process violations at the FCC and sought, among other things, clarification on how the agency would protect the constitutional rights of FCC meeting attendees moving forward. Commissioner Carr explained that the FCC is committed to publishing guidelines to that effect.

I then reiterated arguments that Free Press and Voices for Internet Freedom Coalition members made in comments in the Net Neutrality docket, urging the FCC to insert into the docket and seek public comment on the net neutrality consumer complaints and ombudsperson documents unveiled through a National Hispanic Media Coalition Freedom of Information Act request. I underscored that the complaints and documents respond to a number of the questions that the FCC has posed in the NPRM and that the proper procedure would be for the FCC to open a comment period sufficient for the public to review, analyze and comment thereon.

Next I urged the Commissioner to support public hearings and a comprehensive report about communication networks after the hurricanes that struck the United States this year, with a particular focus on the devastation in Puerto Rico. I suggested that the Commission should collect data and study how restoration efforts differed by geographic region. I stressed the need to examine whether restoration redlining was taking place, whereby wealthy and white neighborhoods are reconnected faster than poorer and more ethnically and racially diverse neighborhoods. I urged the FCC to undertake a comprehensive study that includes public feedback and issue a report with recommendations about what the government needs to build now to prevent widespread devastation of communications networks the next time a storm hits U.S. soil.

I then asked the Commissioner to vote against Sinclair Broadcast Group's acquisition of Tribune Media Company. This combination would plainly exceed the national broadcast ownership cap and the Commission should refrain from shenanigans that provide Sinclair with end-runs around media ownership limits

Relatedly, I advised against relaxation of the broadcast ownership limits. The Third Circuit has made clear that the Commission must not relax media ownership limits without first "consider[ing] the effects of its rules on minority and female ownership." See, e.g., *Prometheus Radio Project v. FCC*, 652 F.3d 431, 471 (3d Cir. 2011).

I respectfully submit this notice of ex parte presentation pursuant to Section 1.1206(b) of the Commission's rules.

Respectfully submitted,

/s/

Jessica J. González  
Deputy Director & Senior Counsel