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April 23, 2003

VIA Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: **In the Matter of 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 02-277**
Cross-Ownership of Broadcast Stations and Newspapers, MM Docket No. 01-235
Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets, MM Docket No. 01-317
Definition of Local Markets, MM Docket No. 00-244
In the Matter of Review of the Commission’s Broadcast and Cable Equal Employment Opportunity Rules and Policies, MM Docket No. 98-204

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission’s Rules, this letter is to provide notice of an *ex parte* meeting in the above-referenced proceedings. On April 23, 2003, Linda Berg of the National Organization for Women (NOW) and Amy Wolverton and Jean Kuei of Georgetown University Law Center’s Institute for Public Representation (IPR), on behalf of NOW, met with Commissioner Kathleen Abernathy and Legal Advisor Stacy Robinson.

During this meeting, representatives of NOW generally discussed the substance of their comments and those of other public interest organizations filed with the Commission in the 2002 Biennial Regulatory Review. NOW’s representatives stressed the importance of the media ownership rules to small businesses, women, and minorities and asked the Commission to maintain separate local media ownership rules. Representatives of NOW pointed out that in many instances of joint ownership of media outlets, owners often repurpose distant news, thus

failing to add a local viewpoint. Further, parties also expressed concern over the declining number of reporters available to cover local issues as many group owners continue to reduce staff and resources.

With regard to the equal employment opportunity proceeding, NOW's representatives urged the Commission to reinstate the Form 395-B filing requirement in time for broadcasters to file by the September 30, 2003 deadline. Representatives of NOW highlighted the need for collection of the Form 395-B workforce data in order to enable the Commission to submit meaningful, comprehensive trend reports to Congress. Further, NOW's representatives also pointed out that allowing stations to file anonymously or through a clearinghouse would compromise the integrity of the 395-B data collection process. A summary of NOW's position on the Form 395-B requirement was provided at the meeting and is attached to this letter.

Finally, NOW's representatives provided a copy of an *ex parte* letter, dated April 21, 2003, filed to address the State Broadcasters Associations' misrepresentations of NOW's position in their recent Reply to NOW's Opposition to Reconsideration. A copy of the *ex parte* letter is also attached.

Pursuant to the Commission's Rules, this *ex parte* notice is being filed electronically through the Commission's Electronic Comment Filing System procedures. Please do not hesitate to contact me at 202-662-9545 should you have any questions regarding this filing.

Sincerely,

Amy R. Wolverton

Attachments

cc: Commissioner Kathleen Abernathy (FCC)
Stacy Robinson (FCC)
Linda Berg (NOW)
Angela Campbell (IPR)
Jean Kuei (IPR)