



November 11, 2009

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

**RE: PS Docket No. 07-287;
MB Docket Nos. 99-325; 04-233**

Dear Ms. Dortch:

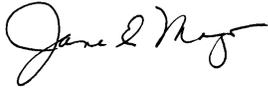
On Tuesday, November 10, 2009, the undersigned and Lew Dickey, Chairman and CEO, Cumulus Media, Inc.; David Field, President and CEO, Entercom Communications Corp.; John Hogan, President/CEO Radio, Clear Channel Radio; Steve Newberry, President and CEO, Commonwealth Broadcasting Corporation; Bruce Reese, President and CEO, Bonneville International Corporation; Jeff Smulyan, Chairman and CEO, Emmis Communications Corporation; Peter Smyth, President and CEO, Greater Media Inc.; and Farid Suleman, Chairman and CEO, Citadel Broadcasting Corporation (collectively, the "CEOs"), met in separate meetings with Commissioner Michael Copps, Jamila Bess Johnson and Lisa Fowlkes; Commissioner Meredith Attwell Baker, Brad Gillen and Millie Kerr; Commissioner Mignon Clyburn and Rick Kaplan; and Commissioner Robert McDowell and Rosemary Harold.

During the meetings, the CEOs explained how including FM receivers in cell phones would enhance public safety. In particular, the participants made the points summarized on the attached leave behind. In addition, the CEOs expressed support for the request of the Joint Parties to increase authorized power for HD Radio service. They urged the Commissioners to act quickly to adopt the recent proposal agreed upon between iBiquity and NPR for an interim, across-the-board power increase. Finally, the CEOs discussed the importance of radio to local communities.

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Please direct any questions concerning this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jane E. Mago". The signature is fluid and cursive, with the first name "Jane" being the most prominent.

Jane E. Mago
Executive Vice President and General Counsel
Legal and Regulatory Affairs

Attachment

cc: The Honorable Michael J. Copps
The Honorable Robert M. McDowell
The Honorable Mignon Clyburn
The Honorable Meredith Attwell Baker
Lisa Fowlkes
Brad Gillen
Rosemary Harold
Jamila Bess Johnson
Rick Kaplan
Millie Kerr



FM Radio in Cell Phones Will Promote Public Safety

- For nearly 50 years, radio and television broadcasters have been the most trusted, primary source of information during times of emergency.
- Following the disruption of cellular networks during 9-11 and Hurricane Katrina, Congress enacted the Warning, Alert and Response Network (WARN) Act of 2006, calling for the creation of the Commercial Mobile Alert System (CMAS) to leverage the reach of mobile wireless technology.
- The cellular industry is developing an emergency warning system based on text messaging (broadcast SMS) technology.
 - This text-based system is nascent; widespread deployment is still years away.
 - Text-based warnings would be limited to 90 characters or less and very costly. Estimates for implementation range from \$200 to \$400 million per provider in one-time expenses, plus \$10 to \$20 million for annual maintenance; costs that would be passed through to cellular customers.
- FM radio reception in cellular handsets will make public safety information available today and should be a critical component of any CMAS solution.
 - Cellular customers would have one-stop shopping for both emergency alerting and in-depth emergency information and instructions.
 - FM radio integrated circuits are ready today, and could easily penetrate the marketplace during the typical 22-month churn of cellular handsets.
 - Total cost for FM radio functionality is approximately \$1 or even less per handset.
- Technical obstacles to incorporating FM chips in mobile handsets have been overcome.
 - Integrated, internal FM antennas are already available in multiple models of mobile handsets.
 - Battery drain from FM radio functionality in handsets is minimal.
 - More than 30% of mobile handsets worldwide already have FM service, and at least 17 models of handsets in the U.S. already have FM radio reception capability, with more anticipated in the near future.
- Broadcasters want to work with the cellular industry to ensure widespread availability of FM radio on mobile handsets.