

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Amendment of the Commission's <i>Ex Parte</i>)	GC Docket No. 10-43
Rules and Other Procedural Rules)	
)	
)	

**REPLY COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (NAB)¹ hereby submits brief reply comments in the above-captioned proceeding seeking to reform certain of the Commission's *ex parte* rules, and responds in particular to two points raised in initial comments on the Further Notice of Proposed Rulemaking in this docket.²

As set forth in our previous comments in this proceeding, NAB supports the Commission's efforts to ensure that oral presentations are accurately documented and supports the principle of disclosing basic information about who presenters and filers

¹ NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and also broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *Amendment of the Commission's Ex Parte Rules and Other Procedural Rules*, Report and Order and Further Notice of Proposed Rulemaking, GC Docket No. 10-43, 76 Fed. Reg. 24434 (May 2, 2011).

are and what their interests are.³ But we have pointed out that achieving meaningful disclosure is not a “one size fits all” issue. *Id.* at 5.

Here, the Commission has sought further comment on adopting a “real parties-in-interest” disclosure rule for *ex parte* presentations or other filings. A number of commenters agree with NAB that individual members of trade associations not present at a meeting need not be named in *ex parte* filings.⁴ This is the sensible and practical way to approach this specific issue. As we previously said, NAB’s standard identification contained on the first page of our filings is descriptive of our members and would enable other parties to understand the nature of our interests in general or in a given proceeding.⁵

In response to proposals for requiring extensive disclosures concerning substantial financial contributions or other support to commenting parties or *ex parte* filers,⁶ we urge the Commission to refrain from overburdening parties and unnecessarily complicating the filing of *ex parte* notices, especially with requirements that the Commission may well find difficult to monitor and enforce. To the extent, moreover, that

³ Reply Comments of the National Association of Broadcasters, GC Docket No. 10-43 (filed June 8, 2010) (NAB Reply Comments).

⁴ Comments of Media Access Project, GC Docket No. 10-43 (filed June 16, 2011) (MAP) at 4, fn. 11; Initial Comments of National Telecommunications Cooperative Association, GC Docket No. 10-43 (filed May 10, 2010) at 10. See Comments of the U.S. Chamber of Commerce, GC Docket No., 10-43 (filed June 16, 2011) at 3, 6, 13, 17.

⁵ NAB Reply Comments at 5.

⁶ Comments of Free Press, GC Docket No. 10-43 (filed June 16, 2011) at 7-16; MAP at 1-3.

such financial information is readily accessible from other sources, e.g., from IRS filings, it would not be necessary to include this extensive information in every *ex parte* filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Valerie Schulte". The signature is fluid and cursive, with a long horizontal stroke at the end.

**NATIONAL ASSOCIATION OF
BROADCASTERS**

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July 18, 2011