



Federal Communications Commission
Washington, D.C. 20554

August 3, 2011

Cheryl L. Parrino
Parrino Strategic Consulting Group
17 Chautauqua Trail
Madison, WI 53719

Dear Ms. Parrino:

The Office of General Counsel is conducting a spot check of ex parte notices to assess compliance with Section 1.206(b)(1), as modified by *Amendment of the Commission's Ex Parte Rules and Other Procedural Rules*, 26 FCC Rcd 4517 (2011). See 47 C.F.R. § 1.1206(b)(1). As part of this effort we have reviewed the ex parte notice you filed on June 24, 2011 in GN Docket No. 09-51 et al., which summarizes an ex parte telephone call that occurred on June 24, 2011.

Section 1.1206(b)(1) provides:

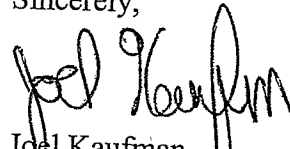
Memoranda must contain a summary of the substance of the ex parte presentation and not merely a listing of the subjects discussed. More than a one or two sentence description of the views and arguments presented is generally required. If the oral ex parte presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum.

We have determined that your notice does not comply with the rule, because it does not summarize the substance of the presentation in the detail required by the rule or, alternatively, provide citations to previous filings containing a summary of the data or arguments presented.

Accordingly, we ask that that you file a supplemental notice that complies with the rule within one week.

Thank you.

Sincerely,



Joel Kaufman
Associate General Counsel and
Chief, Administrative Law Division
Office of General Counsel

cc:
Labros Pilalis