



December 6, 2006

The Honorable Kevin J. Martin, Chairman
The Honorable Michael J. Copps, Commissioner
The Honorable Jonathan S. Adelstein, Commissioner
The Honorable Deborah Taylor Tate, Commissioner
The Honorable Robert M. McDowell, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Re: 2006 Quadrennial 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. 06-121*

Dear Mr. Chairman and Commissioners:

As you continue your review of the media ownership rules, the undersigned radio, television and newspaper companies and associations are united in urging the Commission to recognize, and respond to, the pressing need for reform of the local radio, local television, radio/television and newspaper/broadcast cross-ownership rules so that Americans can continue to be served by vibrant free, over-the-air radio and television stations and daily newspapers.

Technological and marketplace developments – especially the growth of multichannel programming distributors and the Internet – have fundamentally altered the landscape in which the Commission’s ownership rules were originally adopted. Consumers nationally and in local markets of all sizes now enjoy access to, and benefit from, a vast array of information, opinion, and entertainment from a wide range of diverse sources, including television and radio stations, nonbroadcast and multichannel outlets, print publications,

The Honorable Kevin J. Martin, Chairman
The Honorable Michael J. Copps, Commissioner
The Honorable Jonathan S. Adelstein, Commissioner
The Honorable Deborah Taylor Tate, Commissioner
The Honorable Robert M. McDowell, Commissioner
December 6, 2006
Page 2

and the virtually unlimited voices available on the Internet. As a result of this explosion of outlets and new technologies, television and radio broadcasters are experiencing unprecedented challenges in maintaining their audience shares and the advertising revenues essential to the survival of nonsubscription media. Indeed, the primary challenge facing local stations in today's highly competitive environment is remaining economically viable and accordingly able to continue to serve their communities with free, over-the-air entertainment and informational programming – including news, emergency information, and other local programming that their audiences need and expect.

The Commission should modernize its local ownership rules to reflect these dramatic changes in the media marketplace, and to ensure that local television and radio broadcasters, as well as daily newspapers, are not unfairly hampered in their ability to serve the public by outmoded regulations that limit them and not their competitors. Simply put, retaining severe ownership restrictions does not promote the public interest in today's digital multichannel marketplace; to the contrary, it hinders local stations' abilities to provide increasingly costly programming and other diverse, valuable services to local audiences.

The undersigned and the Commission share the common goal of ensuring that free, over-the-air television and radio stations and daily newspapers remain viable and vibrant so that they can effectively serve local viewers, listeners and readers throughout the country. Expedient reform of the media ownership restrictions is urgently needed to achieve this goal, and we look forward to working with the Commission in this endeavor. Please let us know what we can do to assist you or Commission staff.

Sincerely,

ABC Television Affiliates Association, Inc.
Belo Corp.
Bonneville International Corporation
Capital Communications Company, Inc.
CBS Corporation
CBS Television Network Affiliates Association
Citadel Communications Company, Ltd.
Clear Channel Communications, Inc.
Coronet Communications Company, Inc.
Cox Enterprises
Entercom Communications Corp.
FBC (Fox) Television Affiliates Association, Inc.

The Honorable Kevin J. Martin, Chairman
The Honorable Michael J. Copps, Commissioner
The Honorable Jonathan S. Adelstein, Commissioner
The Honorable Deborah Taylor Tate, Commissioner
The Honorable Robert M. McDowell, Commissioner
December 6, 2006
Page 3

Fox Entertainment Group
Gannett Company, Inc.
Gray Television, Inc.
Hearst-Argyle Television, Inc.
Lockwood Broadcasting, Inc.
Media General, Inc.
Mel Wheeler, Inc.
National Association of Broadcasters
NBC Telemundo License Co.
NBC Television Affiliates
NBC Universal, Inc.
Newspaper Association of America
News Press Gazette, Inc.
Pappas Telecasting Companies
Prime Cities Broadcasting, Inc.
Smaller Market Broadcasters Coalition, including Barrington Broadcasting Group,
Cordillera Communications, Drewry Communications, Fisher Communications,
Inc., Freedom Broadcasting, Inc., LIN Television Corp., Morgan Murphy Stations,
Quincy Newspapers, Inc., Raycom Media, Inc., and Schurz Communications, Inc.
Tribune Company
Westwind Communications, LLC
Young Broadcasting, Inc.