



AKIN S. HARRISON
SENIOR VICE PRESIDENT
GENERAL COUNSEL AND SECRETARY

April 10, 2019

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentation
MB Docket Nos. 19-30, 18-349, 17-318 & 17-289**

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's rules,¹ TEGNA Inc. ("TEGNA") hereby notifies the Commission that on April 8, 2019, TEGNA Chairman and CEO Dave Lougee and the undersigned, accompanied by representatives of the National Association of Broadcasters ("NAB") to assist in drafting this notice, met in separate sessions to discuss the above-captioned matters with (1) Chairman Ajit Pai and Chairman Pai's acting media advisor, Alexander Sanjenis, and (2) Commissioner Geoffrey Starks and Michael Scurato, acting legal advisor for media and consumer protection to Commissioner Starks.

Mr. Lougee, Mr. Harrison, and NAB Assistant General Counsel Emmy Parsons met with Chairman Pai and Mr. Sanjenis, during which Mr. Lougee and Mr. Harrison expressed their support for the NAB's proposal to modernize the Commission's national television audience reach cap. NAB previously has explained that its "status quo" proposal, under which the Commission would "continue[] to employ a 39 percent national TV cap" while "accounting for all TV stations at 50 percent of their theoretical audience reach," is a "measured approach [that] would effectively replicate today's regulatory regime, under which broadcasters consistently provide the most relevant and trusted local news and information in local markets across the country."²

The TEGNA representatives also discussed with Chairman Pai and Mr. Sanjenis the need to modernize the Commission's local television ownership rules, emphasizing that in today's video marketplace, broadcast television stations compete intensely for viewers and advertisers

¹ 47 C.F.R. § 1.1206(b).

² See Letter from Rick Kaplan, NAB General Counsel and Executive Vice President, Legal and Regulatory Affairs, to Marlene H. Dortch, FCC Secretary, MB Docket No. 17-318 (Feb. 13, 2019).

not only with each other but with massive, consolidated MVPDs and numerous and growing sources of online video programming, all of which must be taken into account in the Commission's consideration of whether the unique ownership restrictions imposed on broadcasters can continue to be justified as serving the public interest.³

Finally, Mr. Lougee encouraged the Commission to promptly act on TEGNA's license assignment applications with respect to the divested television stations TEGNA has agreed to acquire from Nexstar Broadcasting, Inc., and Tribune Media Company in connection with the pending Nexstar-Tribune transaction.⁴

Separately, Mr. Lougee, Mr. Harrison, and NAB Associate General Counsel Patrick McFadden met with Commissioner Starks and Mr. Scurato to express the views set forth above with respect to the Commission's national television audience reach cap and local television ownership rules. In addition, the TEGNA representatives noted their support for the Commission's efforts to support broadcast ownership diversity through measures such as the recently adopted radio incubator program.⁵

Respectfully Submitted,



Akin S. Harrison
SVP, General Counsel and Secretary
TEGNA Inc.

cc: Chairman Ajit Pai
Commissioner Geoffrey Starks
Alexander Sanjenis
Michael Scurato

3 See Letter from Rick Kaplan, NAB General Counsel and Executive Vice President, Legal and Regulatory Affairs, to Marlene H. Dortch, FCC Secretary, Docket Nos. 18-349, 18-231, 18-227 & 17-214 (Dec. 7, 2018).

4 See TEGNA Inc., "TEGNA to Acquire 11 Local Television Stations in Eight Markets," <http://investors.tegna.com/phoenix.zhtml?c=84662&p=irol-newsArticle&ID=2391826> (March 20, 2019); see also File Nos. BALCDT-20190403ABJ, BALCDT-20190403ABN, BALCDT-20190403ABO, BALCDT-20190403ABP, BALCDT-20190403ABS, BAL-20190403ABV.

5 See *Rules and Policies to Promote New Entry and Ownership Diversity in the Broadcasting Services*, Report & Order, MB Docket No. 17-289, FCC 18-114 (rel. Aug. 3, 2018).