

April 10, 2018

Heritage Broadcasting of Michigan

Pete Iacobelli-CEO

1 Broadcast Way
Cadillac, MI 49601

Commissioner Jessica Rosenworcel

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Sinclair/Tribune Merger

Dear Commissioner Rosenworcel:

I am writing today to express my concerns regarding the Sinclair Broadcasting/Tribune Media merger. I am and have been a local broadcaster working with our family business Heritage Broadcasting of Michigan for 18 years. We run a true local news and content community broadcast television business. I have been the CEO for the last two years which has reconfirmed my belief and actual knowledge revolving around the importance of maintaining "localism" in our communities.

Localism will completely erode within our broadcast television industry for two reasons if Sinclair Broadcasting and Tribune Media are allowed to merge. First reason is retransmission consent. This revenue is the lifeblood of local news and content departments across America. If Sinclair is allowed to own affiliates unbridled across the United States, this will provide them with majority market share of satellite and cable operators retransmission revenue garnering a disproportionate share of this revenue regardless of their ratings. This means other broadcasters will not have an equal playing field to receive their share of retransmission revenue.

The second reason is centralized local news as evidenced this past week with the universal message read on air in every Sinclair Broadcast market that came from corporate. I want to be clear that localism is not only airing the local sports game, 4th of July Parade or local weather, it is developing, communicating face to face and employing the hard working people who live in these communities. Many jobs are preserved and increased with duopolies. Additional employees are hired to manage new sales and content opportunities initially yet when size grows to a national scale (like the one contemplated by Sinclair/Tribune merger) the reverse happens and jobs are eliminated and centralized. The importance of going to the local business that advertises with you and getting to know these folks is immeasurable. Eliminating the ownership cap along with the past elimination of the "Main Studio Rule" destroys local broadcasting at the core. Local, regional and national sales staffs along with news staff become regionalized and nationalized. How can a broadcaster truly know what is going on in a community unless it has face to face interaction with the people in the community? Let's not be mistaken Sinclair wants to maximize dollars and if they can do this through nationalization and a central hub they will continue to do it.

These two reasons, retransmission consent and centralized news, are reason enough to not allow the Sinclair/Tribune merger. This merger will result in the overwhelming anti-competitive market environment. With Sinclair's current size it is already difficult to compete in the marketplace when they

have underperforming ratings compared to other broadcasters and can demand excessive revenue from distribution sources such as DirecTV, Dish, Time Warner and Spectrum cable. If Sinclair and Tribune are allowed to merge the competitive nature becomes insurmountable for local broadcasters to compete with and it will be impossible for broadcasters to negotiate true market rates for syndicated or affiliate content.

I urge you to pressure the FCC and the Department of Justice to not allow this merger it is bad for local broadcast and the health of our communities. Thank you for taking the time to read this letter. Additionally, I am willing and able to come to DC and discuss these issues in person.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Pete Iacobelli', with a stylized, cursive script.

Pete Iacobelli
Heritage Broadcasting of Michigan
CEO