

June 8, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, N.W.
Washington, D.C. 20554

Re: *Ex Parte* Filing in MB Docket
No. 17-318

Dear Ms. Dortch:

The following Local Broadcasters write to submit an additional *ex parte* filing concerning the issue of the appropriate scope of the National Television Ownership Rule (or National Ownership Cap) in the above-captioned docket. The Local Broadcasters include Hearst Television Inc.; Scripps Media, Inc.; Raycom Media, Inc.; Gray Television, Inc.; Graham Media, Inc.; Quincy Media, Inc.; Dispatch Broadcast Group; and Morgan Murphy Media, Inc. A description of each of the entities is set forth in Appendix 1.

As forecast in the Local Broadcasters' May 16th filing, we hereby submit an economic analysis prepared by Mark Fratrick, Ph.D., Sr. Vice-President and Chief Economist of BIA Advisory Services, entitled "Raising the National Television Ownership Cap to 50%: An Economic Analysis."

The analysis supports the Local Broadcasters' previously advanced position that the National Television Audience Cap Rule should be raised to 50% of U.S. TV Households, that the UHF Discount ought to be eliminated, and that pre-existing ownership combinations in excess of 50% ought to be grandfathered.

Dr. Fratrick's report makes a number of salient points. We wish to add one of our own. As the Commission is well aware, the economic condition of newspapers across America and the consequent reduction in their newsroom staffing has depleted the resources committed to original enterprise and investigative reporting.¹ We believe it is essential that local television stations be permitted to achieve economies of scale and scope, and the efficiencies that flow therefrom, in order for local television stations to bulk up their newsrooms to fill this widening void. If local television stations are not permitted the regulatory latitude to grow their newsrooms and serve this critical information need, who will do so? Our nation simply can't afford for this need to go unfulfilled.

We believe that the 50% cap proposal balances the need for a vibrant local television business with the national interest in having diverse ownership of television groups with distinctive editorial voices.

If any questions should arise during the course of your consideration of this matter, kindly let us know.

Respectfully submitted, this the 8th day of June, 2018.

HEARST TELEVISION INC.

By: /s/ Jordan Wertlieb
Jordan Wertlieb
President

SCRIPPS MEDIA, INC.

By: /s/ Brian Lawlor
Brian Lawlor
President, Local Media

¹ See Steven Waldman, Federal Communications Commission, *The Information Needs of Communities: The Changing Media Landscape in a Broadband Age*, at 34, 39-55, (July 2011), https://transition.fcc.gov/osp/inc-report/The_Information_Needs_of_Communities.pdf.

RAYCOM MEDIA, INC.

By: /s/ D. Patrick LaPlatney
D. Patrick LaPlatney
President and CEO

GRAY TELEVISION, INC.

By: /s/ Hilton H. Howell, Jr.
Hilton H. Howell, Jr.
Chairman, President, and CEO

GRAHAM MEDIA, INC.

By: /s/ Emily L. Barr
Emily L. Barr
President and CEO

QUINCY MEDIA, INC.

By: /s/ Ralph M. Oakley
Ralph M. Oakley
President and CEO

DISPATCH BROADCAST GROUP,
a Division of Dispatch Printing Company

By: /s/ Michael J. Fiorile
Michael J. Fiorile
Chairman and CEO

EVENING TELEGRAPH COMPANY d/b/a
MORGAN MURPHY MEDIA, INC.

By: /s/ Brian Burns
Brian Burns
Executive Vice President and COO

APPENDIX 1

- Hearst Television Inc. owns and operates television and radio stations serving 26 media markets across 39 states reaching over 21 million U.S. television households. Through its partnership with most of the major networks, Hearst Television distributes national content over nearly 70 video channels including programming from ABC, NBC, CBS, CW, MY Net, MeTV, Estrella and more. Each week the television group provides over 1000 hours of regularly scheduled local news and information programming. Hearst Television is recognized as one of the industry's premier companies and has been honored with numerous awards for industry innovation, community service, and distinguished journalism, including nine consecutive Walter Cronkite Awards for Excellence in TV Political Journalism. Hearst Television is a wholly-owned subsidiary of privately-held Hearst Corporation.
- Scripps Media, Inc. has operated broadcast television stations since 1947, when it launched Ohio's first television station, WEWS, in Cleveland. Today, Scripps' television station group reaches approximately 18% of the nation's television households and includes 15 ABC affiliates, five NBC affiliates, two FOX affiliates, two CBS affiliates, and four non-big-four affiliated stations. Scripps also owns five Azteca America Spanish-language affiliates. Scripps stations produce high-quality news, information, and entertainment content that informs and engages local and national communities. Scripps distributes content on four platforms: broadcast, Internet, smartphones, and tablets. It is Scripps' objective to develop content and applications designed to enhance the user experience on each of those platforms. Scripps' ability to cover its communities across multiple digital platforms allows the stations to expand their audiences beyond traditional broadcast television boundaries. Scripps Media is a wholly-owned subsidiary of E.W. Scripps Co. (NYSE: SSP).
- Raycom Media, Inc., an employee-owned company headquartered in Montgomery, Alabama, is one of the nation's largest privately-owned local media companies and owns and/or provides services for 65 television stations in 44 markets located in 20 states. Founded in 1997, Raycom Media owns or provides services for stations covering 16% of U.S. television households and employs over 8,300 individuals in full and part-time positions. In addition to television stations, Raycom Media is the parent company of CNHI (community newspapers and information products; over 100 titles located in 23 states), PureCars (digital ad platform for the automotive industry), Raycom Sports (a marketing, production, and events management and distribution company), Tupelo Raycom (sports and entertainment production company), RTM Productions (automotive programming production and marketing solutions company) and Broadview Media (a post-production/digital signage company). Raycom Media television stations have been the recipients of national Murrow and IRE awards each of the last 3 years and are nominated for a Peabody Award in 2018. In addition, the stations have earned numerous regional Murrow, AP, and other journalistic honors.

- Gray Television, Inc. owns and/or operates over 100 television stations across 57 television markets that cover approximately 10.4 percent of total United States television households. These stations collectively broadcast over 200 program streams including over 100 channels affiliated with the CBS Network, the NBC Network, the ABC Network and the FOX Network. Gray's portfolio includes the number-one and/or number-two ranked television station operations in each of its markets, as well as the top-ranked station for local news in 40 markets. Gray's professionals are routinely recognized for their journalistic achievements and community leadership. Most recently, the NAB Educational Foundation named Gray stations as the winners of its 2018 Service to Community Award for Television for both the Medium Market category and the Small Market category.
- Graham Media, Inc., a subsidiary of Graham Holdings Company (NYSE: GHC), owns seven local televisions, each in a top-70 market and all recognized as news leaders: KPRC–Houston, WDIV–Detroit and WSLR–Roanoke (NBC); KSAT–San Antonio (ABC); WKMG–Orlando (CBS); WJXT–Jacksonville (fully local), and WCWJ–Jacksonville (CW), as well as Social News Desk, a leading provider of social media management tools designed to connect newsrooms with their users. The stations also broadcast digital channels focusing on classic television and lifestyle programming, in addition to operating market-leading websites, mobile sites, and mobile apps delivering breaking news, weather, and community news, reaching millions of users across each platform. All are deeply involved in local initiatives and public service projects designed to serve, inform, and improve their respective communities. Graham Media Group was named 2016 Station Group of the Year by Broadcasting & Cable Magazine and is the recipient of multiple regional Edward R Murrow Awards, the 2017 National Association of Broadcasters Digital Leadership Award, and multiple regional Emmy and Associated Press Awards for its local news and investigative coverage.
- Quincy Media, Inc. has been in the local television business since 1953. The company operates local television stations in 14 markets with 42 different program streams. Its affiliations include NBC, ABC, CBS, FOX, My Network TV, CW, ME TV, Heroes and Icons, and Decades. QMI is a family-owned, private media company with sixth generation family members active in the business. The company was formed in 1926. In addition to owning and operating local television stations, the company also operates two radio stations and two newspapers. QMI has a long tradition of deep involvement in the communities in which it operates through local news, public service, and community involvement.
- Family-owned since 1929, Dispatch Printing Company's division known as Dispatch Broadcast Group is a highly-respected, award-winning group of television and radio stations in the Midwest. Dispatch operates WBNS-TV, the CBS affiliate in Columbus, Ohio, and WTHR-TV, the NBC affiliate in Indianapolis, Indiana. The company also operates Radio Stations WBNS-AM and WBNS-FM in Columbus, as well as the Ohio News Network. WBNS-TV began operations in 1949.

- Morgan Murphy Media, Inc. is a multimedia company with a long heritage of community service and industry leadership through three generations of family ownership dating back to 1890. Founded in the newspaper business, the company has always been forward-looking and today aggressively serves audiences and advertisers through a variety of electronic and digital offerings. It operates television stations in six markets covering 10 states in the Midwest, Northwest, and Texas and 12 radio stations focused in Washington and Wisconsin. The company also provides a 24/7 weather channel in Texas, runs Madison Magazine, a monthly lifestyle publication, and a digital marketing agency, Phase 3 Digital. Its news organizations are consistently honored with the most prestigious journalism awards in the industry. Since 2015, MMM stations have earned five national Edward R. Murrow awards from the RTDNA, including the top prize for overall excellence.

Marlene H. Dortch
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