

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
Applications of Tribune Media Company)
and Sinclair Broadcast Group) MB Docket No. 17-179
For Consent to Transfer Control of)
Licenses and Authorizations)
)
)
)

**COMMENTS OF AWE – A WEALTH OF ENTERTAINMENT, CINÉMOI, MAVTV
MOTORSPORTS NETWORK, ONE AMERICA NEWS NETWORK, AND RIDE
TELEVISION IN SUPPORT OF THE MOTION OF DISH NETWORK, AMERICAN
CABLE ASSOCIATION, AND PUBLIC KNOWLEDGE FOR ADDITIONAL
INFORMATION AND DOCUMENTS AND EXTENSION OF TIME**

AWE – A Wealth of Entertainment, Cinémoi, MAVTV Motorsports Network, One America News Network, and RIDE Television file these comments in support of the Motion of DISH Network L.L.C., American Cable Association, and Public Knowledge (collectively, the “Petitioners”) for Additional Information and Documents and Extension of Time in the above-captioned proceeding.¹ According to the Applicants own filing, the transaction would exceed the national ownership cap and violate the Commission’s duopoly rule in at least 11 markets.² For these and other reasons, this transaction raises competitive concerns and questions of law. Yet

¹ Motion of DISH Network, American Cable Association and Public Knowledge for Additional Information and Documents and Extension of Time, MB Docket No. 17-179 (filed July 12, 2017) (the “*Petition*”).

² See Applications of Tribune Media Company and Sinclair Broadcast Group for Consent to Transfer Control of Licenses and Authorizations, Comprehensive Exhibit at 1 (filed June 28, 2017).

the information provided by the Applicants is insufficient to evaluate the purported public interest benefits and weigh them against the resulting harms.³

The Applicants bear the burden of proving their transaction is in the public interest.⁴ The Application, however, does not contain sufficient information to meet this burden. As the Petitioners explained, “the applications provide insufficient information for the Commission to validate, let alone quantify, the claimed public interest benefits. The applications and supporting documents thus fail to provide the information necessary to conduct a public interest analysis of this transaction.”⁵ We agree. The Applicants must be required to provide additional information to enable a full evaluation of the impact of this transaction.

³ See *Petition* at 4 (“[T]he Applicants provide no information by which the Commission or interested parties could quantify the claimed public interest benefits”); Comments of NTCA – The Rural Broadband Association in Support of DISH Network, *et. al.* Motion for Additional Information and Documents and Extension of Time, MB Docket No. 17-179, at 2 (July 14, 2017) (“[T]he record in this proceeding is woefully inadequate. There is paltry information on the record to support the asserted public interest benefits of the transaction or to address the potential harms to the public and competition.”); Letter from Todd O’Boyle, Program Director, Common Cause, to Ajit Pai, Chairman, FCC, MB Docket No. 17-179 (July 17, 2017) (“[T]he applications are woefully deficient in demonstrating any meaningful public interest benefits providing merely two and half pages of conclusory statements devoted to the core determination that must be made by the Commission.”).

⁴ 47 U.S.C. 310(d).

⁵ *Petition* at 1-2.

As a result, AWE – A Wealth of Entertainment, Cinémoi, MAVTV Motorsports Network, One America News Network, and RIDE Television support the request for additional information, as outlined in Section II of the Petition. In addition, we support the Petition’s request to extend the pleading cycle in this proceeding.⁶

Respectfully submitted,

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July 20, 2017

⁶ *Id.* at 2.

CERTIFICATE OF SERVICE

I, Michael Fletcher, hereby certify that on July 20, 2017, I caused true and correct copies of the foregoing to be served by electronic mail upon the following:

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