



Monday, August 7, 2017

The Honorable Ajit V. Pai
Chairman
Federal Communications Commission
445 12th Street NW
Washington, D.C. 20004

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

Dear Chairman Pai:

Allied Progress is a nationwide nonprofit consumer watchdog organization dedicated to holding special interests accountable and empowering hard-working Americans. As such, we have significant concerns regarding whether the proposed Sinclair Broadcast Group and Tribune Media transaction is in the public interest. We write to support the July 12, 2017, "Motion for Additional Information and Documents and Extension of Time" filed by DISH Network, American Cable Association, and Public Knowledge.

The Sinclair Broadcast Group's proposed purchase of Tribune Media would include the acquisition of Tribune's 42 local news stations. Should the merger be approved, Sinclair would own a staggering 233 television stations across the country, capable of reaching 72 percent of American households. This level of ownership is unprecedented and would violate the national ownership cap, as well as the duopoly rules in at least 11 markets. Further, the merger would create the single largest operator of local broadcast stations in the country.

Sinclair states in its initial filing that it may modify its application based on any potential changes to the media ownership rules that the company anticipates will result from reconsideration of the 2014 Quadrennial Review proceeding and a proceeding to examine the national ownership rule and UHF discount, which the Chairman has stated will be launched later this year. If changes to the television ownership rules are that critical to this proposed transaction, then it is imperative for the Commission to finish its review of these rules before the public comment on this transaction is complete.

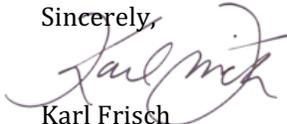
In addition to these specific legal issues, the information provided by Sinclair is woefully insufficient to determine the effect this transaction will have on the public interest. The FCC public interest standard goes beyond economic analysis to include not only the impact on the industry, but also the impact on consumers. The goals include preserving and enhancing competition in relevant markets and ensuring a diversity of information sources and services to the public. Simply put, not only does this merger fail to benefit consumers, it does harm to the public that the FCC has a statutory responsibility to protect.

Sinclair, known for its partisan slant, has garnered headlines for forcing local stations to air politically biased editorials ahead of elections. Local news is a pillar in any community. Sinclair's

acquisition of Tribune Media would result in less competition, fewer local program options and higher costs for consumers. Further, with the potential to reach 72 percent of American households, this would deny these households the diversity of information sources crucial to the public interest standard.

The American public deserves a full consideration of this impactful merger. Given the far-reaching implications of the transaction, more information is necessary on both how Sinclair intends to comply with the television ownership rules and specific information to support its public interest statements. Then, and only then, can interested parties adequately analyze the impact and submit comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Karl Frisch", written over a light blue horizontal line.

Karl Frisch
Executive Director
Allied Progress