

December 29, 2017

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission

RE: Initial Comments
Notice of Proposed Rulemaking
MB Docket Nos. 17-264, 17-105, 0-06

Dear Madam Secretary,

By this correspondence, Meredith Corporation, Raycom Media, Inc. and Graham Media Group, Inc. (together, "Broadcast Commenters") hereby comment in support of the Commission's tentative conclusion in the above-referenced Notice of Proposed Rulemaking that the Commission should eliminate the reporting obligation for DTV stations that have received no feeable revenues from ancillary or supplementary services during the applicable reporting period. We believe the Commission should, at the very least, simplify the local public notice rule and allow for internet posting in lieu of newspaper posting. Meredith's Local Media Group includes 17 owned or operated television stations reaching 11 percent of U.S. households. Raycom owns and/or provides services for 65 television stations and two radio stations in 44 markets, capturing over 16 percent of U.S. households. Graham Media Group owns seven television stations in six markets reaching around seven percent of U.S. households.

On November 15, 2017, the Media Bureau *sua sponte* waived the December 1, 2017 filing deadline for ancillary or supplemental fee reports for those DTV stations that did not receive feeable income. (See http://transition.fcc.gov/Daily_Releases/Daily_Business/2017/db1115/DA-17-1112A1.pdf). As none of the Broadcast Commenters' stations received any ancillary or supplemental revenues during the reporting period, the 2017 period provides a perfect example of how the Commission's tentative conclusion has saved time, effort, and money with no detrimental effect on the public interest. Put simply, many television stations avoided the need to fill out a form (and the associated costs of time and legal fees), while the Commission still received the necessary information for television stations that owed ancillary and supplemental fees. In addition, fewer filings means less strain on the Commission's databases and systems, particularly around a common filing date.

The Broadcast Commenters also support the Commission's proposal to streamline the local public notice process. The Commission should at the very least switch to an online-only notice process, but could go as far as to remove all public notice publication requirements. We note that our cable, satellite, and telecommunications competitors do not have similar public notice requirements.

To be clear, the Broadcast Commenters believe that the Commission should apply its decisions in this proceeding to all of the rules requiring some sort of notice by publication in Part 73. Certainly, the Commission should terminate the earlier proceeding suggesting even greater publication requirements.

As this Commission has recognized in other contexts, such as contesting, the online public inspection file, and media ownership, consumers now are comfortable with information provided on the internet in linkable form. The modern media consumer most likely does not read a paper newspaper, and if they do, would not be expected to check the fine print of a legal notice in the classified section. Instead, consumers can find information on the FCC's website, or local public notice can be achieved by providing the consumer with a direct URL or link over-the-air (where on-air notice is currently required). Where on-air notice is not currently required, a prominent link on the station's website could suffice.

Once a consumer types in or clicks on a link, the Broadcast Commenters support simplification of the notice content requirements (should any remain at all), such as permitting a website link directly to a relevant FCC application in lieu of a listing of parties. Given, however, the lack of time and space constraints on the internet, the Broadcast Commenters would not oppose retaining the existing content requirements so long as only required online. Currently, it can be difficult to provide all the necessary information in a visual and audio form on-air or in a printed legal notice given the large number of attributable parties for many modern television broadcasters. That difficulty is much less on an internet site.

In conclusion, the Broadcast Commenters support the Commission's efforts to clear "regulatory underbrush." The proposals outlined in the above-referenced Notice of Proposed Rulemaking will lower costs on regulated parties while protecting and furthering the public interest. For ancillary and supplemental fee reports, there is no harm to the public and a benefit of less strain on the Commission's systems. For the local public notice requirements, removing requirements and/or moving to the internet will allow broadcasters to save time and money while providing consumers content in a format to which they have become accustomed. In short, these proposals are win-win-win for broadcasters, the Commission, and the public.

Very Truly Yours,



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