



EX PARTE OR LATE FILED

January 13, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

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**Re: Ex Parte Presentation
Allbritton Communications Company
MM Docket Nos. 91-221/87-7; 94-150**

Dear Ms. Salas:

Pursuant to Section 1.1206 (b)(2) of the Rules, this letter is submitted in duplicate to advise the Commission that the undersigned met on January 13, 1998 with Commissioner Harold Furchgott-Roth and his legal advisor, Helgi Walker, in connection with the above-referenced proceedings. The underlying rationale for the television multiple ownership rules was discussed in the context of dramatic changes in the industry since the Duopoly Rule was adopted. Specific reference was made to the benefits of "coverage LMAs," enhancements to program diversity from local marketing arrangements, the logic and workability of a DMA-based market definition and options for Duopoly waivers under any revised standard.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

Jerald N. Fritz
Vice President
Legal and Strategic Affairs

cc: Helgi Walker, Esq.

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