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

Re Ex Parte Presentation
Paxson Communications Corporation
MM Docket No. 91-221

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's Rules, this letter is submitted in duplicate to advise the Commission that the undersigned and Lowell W. Paxson, Chairman of Paxson Communications Corporation ("PCC") met on January 27, 1998 with Commissioner Harold Furchgott-Roth and his legal advisor, Helgi Walker, in connection with the above-referenced proceedings. PCC's previously filed Comments in the above referenced proceeding were discussed and the attached summary of PCC's position on television ownership was provided.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted

John R. Feore, Jr.

JRF:sjw

Enclosure

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PAXSON COMMUNICATIONS CORPORATION
STATEMENT OF POSITION ON TELEVISION OWNERSHIP

RE: Second Further Notice of Proposed Rulemaking, MM Docket No. 91-221 (Released November 7, 1996)

The FCC's new television duopoly rule should:

- **PERMIT THE COMMON OWNERSHIP OF TELEVISION STATIONS LOCATED IN DIFFERENT ADI/DMAs REGARDLESS OF CONTOUR OVERLAP**

- **NOT IMPOSE ANY ADDITIONAL CONTOUR-BASED TEST**

ADI/DMAs DEFINE THE APPROPRIATE MARKET FOR TELEVISION OWNERSHIP PURPOSES.

- ADI/DMAs are the accurate measure of the area in which television stations impact diversity and economic competition. Advertising and programming are bought and sold on ADI/DMAs not on service contour location. Viewers within an ADI/DMA identify with stations assigned to that ADI/DMA and they do not identify with or significantly view television stations that may provide technical – but not programming or advertising – service to their ADI/DMAs.

ADI/DMAs PROVIDE CLEAR GUIDANCE.

- ADI/DMA assignments directly reflect viewership and competition for advertisers and provide a logical standard for the application of FCC ownership rules. ADI/DMAs provide an ideal administrative tool for realistically revised FCC television ownership regulations.

CONTOUR-BASED STANDARDS ARE UNNECESSARY.

- The addition of a Grade A Contour standard simply acts to distort the natural television market definition created by ADI/DMAs and does not reflect a television station's area of competition for advertisers, viewers or its dissemination of news and public interest programming. It is an unnecessary regulatory addition to an otherwise sound ownership proposal.

AN ADI/DMA RULE IS A SLIGHT MODIFICATION OF THE CURRENT WAIVER POLICY.

- The FCC is currently granting duopoly waivers if the stations are located in different DMAs with no Grade A overlap.

- The slight expansion of this policy (to remove overlap consideration) will greatly benefit television ownership in areas such as the Northeast where the ADI/DMAs are in close proximity.