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DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

COPY

JOHN R. FEORE, JR.
DIRECT DIAL 202-776-2786
jfeore@dialaw.com

WASHINGTON, D.C.
1200 NEW HAMPSHIRE AVENUE, N.W. - SUITE 800 - WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 - FACSIMILE 202-776-2222

ONE RAVINIA DRIVE - SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

February 13, 1998

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re Ex Parte Presentation
Paxson Communications Corporation
MM Docket Nos. 91-221, 87-7, 96-222, 94-150

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, Lowell W. Paxson, Chairman of Paxson Communications Corporation ("PCC") and Dean Goodman of PCC met on February 12, 1998 with Chairman William E. Kennard, his senior advisor, Susan Fox, Roy Stewart, Chief of the Mass Media Bureau and John Logan, Deputy Chief of the Cable Services Bureau, 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/lis
Enclosure

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/DMA_s REGARDLESS OF CONTOUR OVERLAP**
- ▶ **NOT IMPOSE ANY ADDITIONAL CONTOUR-BASED TEST**

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

- ▶ ADI/DMA_s 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/DMA_s 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/DMA_s.

ADI/DMA_s 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/DMA_s 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/DMA_s 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 DMA_s 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/DMA_s are in close proximity.