



WASHINGTON, DC

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September 26, 2014

**VIA HAND DELIVERY**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Confidentiality of Retransmission Consent Agreements  
MB Docket Nos. 14-57, 14-90

Dear Ms. Dortch:

Journal Broadcast Corporation (“Journal”), the licensee of 12 television stations in nine markets, by its attorneys, hereby submits comments in response to a Public Notice (DA 14-1383) released by the Commission on September 23, 2014 in the above-referenced dockets. The Public Notice notes that *ex parte* filings made by several broadcasters have raised concerns with respect to the Commission’s requests to Time Warner Cable, Comcast Corporation, Charter Communications, Inc., AT&T and DIRECTV (collectively, the “MVPDs”) that they submit copies of highly confidential retransmission consent agreements with broadcasters in unredacted form. As numerous other broadcasters have emphasized, these unredacted agreements will be available to outside counsel of parties to the above referenced proceedings, and, in light of the large number of entities that are parties, the highly sensitive competitive data they contain could be widely disseminated.

Journal agrees with the concerns expressed by other broadcasters and respectfully urges the Commission to adopt additional protective measures and review these agreements in

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consultation with the U.S. Department of Justice, which has already obtained copies of them, rather than requesting the MVPDs to file the agreements in the record for the above-referenced proceedings. This method would provide for efficient review of the documents without risking the dissemination of highly confidential and competitively sensitive information.

Respectfully submitted,

\_\_\_\_\_/s/  
Sally A. Buckman

*Counsel to Journal Broadcast Corporation*

cc: Berry Best Copy and Printing, Inc. (via email)  
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