

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
)  
Review of Foreign Ownership Policies for ) GN Docket No. 15-236  
Broadcast, Common Carrier and Aeronautical )  
Radio Licensees under Section 310(b)(4) of )  
the Communications Act of 1934, as )  
Amended )

**REPLY COMMENTS OF MEDIA GENERAL, INC.**<sup>1</sup>

The overwhelming weight of comments support the NPRM’s proposals to achieve regulatory parity between broadcast licensees and other Commission-regulated entities through streamlined rules and procedures for broadcast foreign ownership approval. Such long-overdue reforms would inject investment capital in broadcasting, increase competition in the communications sector as a whole, spur innovation, and foster reciprocal investment opportunities for U.S. companies abroad.

Media General agrees with NAB that “a more clearly defined review and approval process will provide licensees greater transparency and predictability.”<sup>2</sup> Media General is a publicly-traded company, and it corroborates NAB’s statement that a significant number of its publicly-traded shares are held in “street name.”<sup>3</sup> To account for this reality, companies like Media General need more flexible rules and procedures to demonstrate compliance with any broadcast foreign ownership restrictions. Compiling the detailed ownership information required

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<sup>1</sup> Media General, Inc. (“Media General”) hereby submits reply comments in response to the Commission’s Notice of Proposed Rulemaking in the above-captioned proceeding. *See Review of Foreign Ownership Policies for Broadcast, Common Carrier and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act of 1934, as Amended*, Notice of Proposed Rulemaking, FCC 15-137 (rel. Oct. 22, 2015) (“NPRM”). Unless otherwise noted, all comments cited were filed in GN Docket No. 15-236.

<sup>2</sup> Comments of NAB, at 2.

<sup>3</sup> *Id.*, at 25-26.

under the FCC’s current process and procedures is, as MMTC stated, “a complicated and costly process, involving extensive legal analysis, detailed surveys and investigations of generally unavailable shareholder information.”<sup>4</sup> Therefore, Media General agrees with NAB that “broadcasters should be permitted to utilize reasonable measures to determine the citizenship of all their interest holders that are reasonably identifiable.”<sup>5</sup>

Media General also supports the Commission’s proposal for broadcast ownership disclosure requirements to be “based on the current attribution rules and policies applicable to broadcast licensees.”<sup>6</sup> Through numerous FCC filings, Media General has familiarity with this attribution standard, which works to “identify those interests . . . [which] have a realistic potential to affect the programming decisions of licensees or other core operating functions.”<sup>7</sup> Media General agrees with the FCC that “it would pose an undue hardship to establish a different disclosure threshold for broadcasters.”<sup>8</sup>

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<sup>4</sup> Comments of MMTC, at 2.

<sup>5</sup> Comments of NAB, at 27.

<sup>6</sup> NPRM, ¶ 14.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

Media General commends the Commission for recognizing that broadcast foreign ownership rules and policies will “provide the broadcast sector with greater transparency, more predictability, and . . . reduce[d] regulatory burdens and costs.”<sup>9</sup> The company urges the Commission to act promptly on the NPRM’s proposals designed to achieve broadcaster flexibility and regulatory parity.

Respectfully submitted,

**MEDIA GENERAL, INC.**

By: \_\_\_\_\_/s/\_\_\_\_\_

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<sup>9</sup> *Id.*, ¶ 1.