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December 7, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND DELIVERY

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

Re: Ex Parte Notice /
MM Docket Nos. 87-8, 87-154, 91-221, 92-51, 94-150, & 96-197

Dear Ms. Salas:

On behalf of Granite Broadcasting Corporation ("Granite"), Antoinette Cook Bush of Skadden Arps Slate Meagher & Flom, LLP, Marlene Colucci of Akin, Gump, Strauss, Hauer & Feld, L.L.P., and the undersigned made an ex parte presentation on December 4, 1998 regarding the above-referenced proceedings to Anita Wallgren, Legal Advisor to Commissioner Susan Ness. In this meeting we discussed Granite's position on proposed changes in the television duopoly rule of the Federal Communications Commission ("FCC") and suggested a relaxation of the television duopoly rule to grant waivers upon the satisfaction of certain criteria that are designed to ensure that diversity and competition will continue in the relevant market.

The factors Granite recommended the FCC incorporate into a television duopoly waiver standard are: (1) service to distinct communities; (2) a combined audience share (as measured by Nielsen) that is small relative to the stations in the DMA with the largest market shares; (3) individual market shares (as measured by Nielsen) that are insignificant relative to other stations in the DMA; (4) the availability of numerous alternative independent media voices in the market; and (5) major television network affiliation (i.e., ABC, CBS, NBC or Fox) by no more than one of the two stations.

AKIN, GUMP, STRAUSS, HAUER & FELD, L.L.P.

Ms. Magalie Roman Salas
December 7, 1998
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Please direct any questions on this matter to the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Tom W. Davidson". The signature is fluid and cursive, with a prominent initial "T" and a long, sweeping underline.

Tom W. Davidson, Esq.

cc: Toni Cook Bush, Esq.
Anita Wallgren, Esq.