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(202) 887-4000
FAX (202) 887-4288
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December 10, 1998

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, Karen Goldmeier of Akin, Gump, Strauss, Hauer & Feld, L.L.P., and the undersigned made an ex parte presentation on December 9, 1998 regarding the above-referenced proceedings to Susan Fox, Senior Legal Advisor to Chairman William E. Kennard. In this meeting we discussed Granite's position on proposed changes in the television duopoly rule of the Federal Communications Commission ("FCC") and suggested an exception to or waiver of the television duopoly rule 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 exception or waiver standard are: (1) service to distinct communities; (2) a combined audience share that is small relative to the stations in the DMA with the largest market shares; (3) individual market shares that are insignificant relative to other stations in the DMA; and (4) the availability of numerous alternative independent media voices in the market.

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

Ms. Magalie Roman Salas
December 10, 1998
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Please direct any questions on this matter to the undersigned.

Very truly yours,

A handwritten signature in cursive script that reads "Tom W. Davidson, Esq.".

Tom W. Davidson, Esq.

cc: Toni Cook Bush, Esq.
Susan Fox, Esq.