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November 24, 1998

Chairman William Kennard  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

Dear Chairman Kennard:

I just read in the *Broadcasting and Cable TV* fax where you recently received a letter from Congressman Burr urging you to continue to allow LMAs. His argument in part was because "we can promote better programming, create greater diversity, and allow stations to adapt to changing market forces."

Based on my own experience, it's obvious the Congressman does not understand what has happened, insofar as LMAs are concerned. We have two LMAs operating in Charlotte. I can assure you, and I can assure the Congressman, that these LMAs have done nothing to promote better programming or to create greater diversity. What has occurred is a concentration of power and programming. The public interest is not being served. The only interest being served is the stations who operate the LMAs because of the additional muscle they can flex in the market by leveraging two stations. Instead of programming diversity, we simply see dual runs of the same show (one run on each station), which increases their buying power with program syndicators as opposed to creating program diversity.

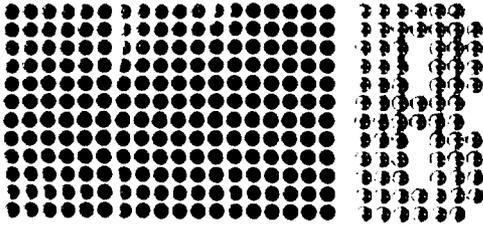
I hope the FCC will totally eliminate Local Marketing Agreements for television because, based on my experience, the public interest is not being served period -- end of discussion!

My continued best wishes to you, Mr. Chairman, and please accept my best wishes for the Holiday Season.

Best personal regards,

  
Cullie M. Tarleton

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December 10, 1998

Commissioner Susan Ness  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

Dear Commissioner Ness:

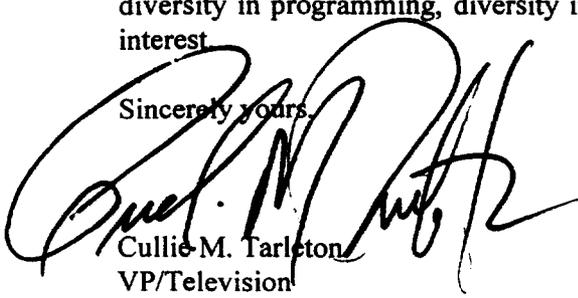
Enclosed is a copy of a letter dated November 24, 1998, I sent to Chairman Kennard on the subject of television LMAs. In a conversation with Anita Wallgren, she suggested I send a copy to you.

In addition to the point I attempted to make in the letter, today's (December 9, 1998) copy of *Broadcasting and Cable* TV fax speaks to a letter the FCC has received from Speaker-elect Livingston and other members of Congress urging the Commission to drop a proposal to eliminate local TV marketing agreements because "Most broadcasters who invested the time, money and resources in LMAs will face financial hardships if forced to walk away from their investments".

Based on my experience with LMAs and my knowledge of the content of some of the LMA agreements, no broadcaster I'm aware of will suffer or face financial hardships if the Commission eliminates LMAs. Most LMA agreements cover the issue as to what will happen if, due to regulatory changes, LMAs are no longer permitted. Broadcasters who invested in LMAs will get their capital dollars back and, in most cases, will also share in the proceeds if the station is sold. All that's on top of the money they've been making for the past several years operating the LMA and, rest assured, they are making money - big money!

I realize I'm in the minority as a broadcaster urging the Commission to eliminate LMAs. But, I stand firm in my belief that LMAs do not serve the public interest. They do not create diversity in programming. My experience has been, as I pointed out in my letter to the Chairman, that LMAs simply create a concentration of power in the hands of a few broadcasters who will attempt to move heaven and earth to avoid losing that concentration of power. If the FCC is truly interested in the public's interest being served, and I believe you are, then I urge you and your colleagues to move forward and eliminate LMAs and provide a sunset provision whereby existing LMAs will cease to exist. Such a rule would create diversity in ownership, diversity in programming, diversity in covering local news and local issues, and truly serve the public interest.

Sincerely yours,

  
Cullie M. Tarleton  
VP/Television

Enclosure