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March 3, 1999

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

EX PARTE OR LATE FILED

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 and the undersigned made an ex parte presentation on March 1, 1999 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 and suggested a relaxation of the television duopoly rule to allow the ownership of two television stations in the same designated market area upon the satisfaction of certain criteria that are designed to ensure that diversity and competition will continue in the relevant market

The factors Granite advocated in previous submissions that 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; and (4) the availability of numerous alternative independent media voices in the market.

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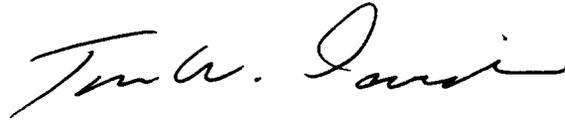
Ms. Magalie Román Salas

March 3, 1999

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Please direct any questions on this matter to the undersigned.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Tom W. Davidson".

Tom W. Davidson, Esq.

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