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Jerald N. Fritz
Corporate Vice President
Legal and Strategic Affairs
Tel: (202) 728-4383
Fax: (202) 331-1898
jfritz@allbrittontv.com

July 12, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARYMs. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554**Re: Ex Parte Presentation**
Allbritton Communications Company
MM Docket Nos. 91-221; 87-7; 94-150

Dear Ms. Salas:

Pursuant to Section 1.1206 (b)(2) of the Rules, this letter is submitted in duplicate to advise the Commission that the undersigned met on July 12, 1999 with Roy Stewart, Chief, Mass Media Bureau, and members of his staff in connection with the above-referenced proceedings. The underlying rationale for the television multiple ownership rules was discussed in the context of dramatic changes in the industry since the Duopoly Rule was adopted. Specific reference was made to the benefits of "Enhanced Coverage LMAs," the satellite station exception, increased program diversity from local marketing arrangements, the logic and workability of a DMA-based market definition and options for Duopoly waivers under any revised standard.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

Jerald N. Fritz
Vice President
Legal and Strategic Affairs

cc: Roy Stewart

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