Table 1
Prime Time Station Shares

Stations	Share of Television Households	Share of Television Viewers	Share of Broadcast Television Viewers*
New York City, #1			
WNBC: NBC	10.4	15.6	20.2
WABC: ABC	8.4	12.6	16.3
WCBS: CBS	9.0	13.5	17.5
WNYW: FOX	6.2	9.2	11.9
WWOR: UPN	3.7	5.6	7.2
WPIX: WBN	5.4	8.3	10.7
WXTV: IND	3.0	4.5	5.8
WNET: PBS	1.9	2.8	3.6
WPXN: PAX	1.4	2.1	2.7
WLNY: IND	0.5	0.8	1.0
WLIW: IND	0.5	0.8	1.0
WNJU: IND	0.4	0.7	0.9
WNJN+: IND	0.3	0.5	0.6
NY1: IND	0.2	0.2	0.3
WNYE: IND	0.1	0.1	0.1
Total	**51.4**	**77.3**	**100.0**
Indianapolis, #25			
WTHR: NBC	11.3	17.8	25.3
WRTV: ABC	7.3	11.5	16.3
WISH: CBS	10.0	15.8	22.4
WXIN: FOX	5.2	8.0	11.4
WNDY: UPN	2.3	3.6	5.1
WTTV+: WBN	5.4	8.5	12.1
WFYI: IND	1.9	2.9	4.1
WIPX: PAX	0.8	1.3	1.8
WIPB: IND	0.3	0.4	0.6
WALV: IND	0.2	0.4	0.6
WHMB: IND	0.1	0.2	0.3
Total	**44.8**	**70.4**	**100.0**
Providence - New Bedford, #50			
WJAR: NBC	12.0	18.5	34.5
WLNE: ABC	5.5	8.5	15.9
WPRI: CBS	9.0	13.8	25.7
WNAC: FOX	4.6	7.0	13.1
WLWC: WBN	2.1	3.3	6.2
WSBE: IND	0.9	1.3	2.4
WPXQ: PAX	0.8	1.2	2.2
Total	**34.9**	**53.6**	**100.0**

Source: Nielsen Media Research

* Calculated number, see text.

The three markets represent a range of sizes and are ranked 1, 25, and 50 in terms of the number of television households. All data are for May 1999.

18. Table 1 reports three measures of station shares:

- *Share of television households* (commonly known as *ratings*) refers to the percentage of television households in the station's market who viewed that station.
- *Share of television viewers* refers to the percentage of households watching television in a station's market who viewed that station. The denominator in this share calculation includes both broadcast and cable television viewing.
- *Calculated share of broadcast television viewers* is an estimate of the percentage of households watching broadcast television in a station's market who viewed that station. It is calculated by dividing the station's share of television viewers by the sum of the television viewer shares of all broadcast television stations in that relevant geographic market.

19. While one can debate whether a cable system constitutes a bottleneck asset, there is no question that a single broadcast television station does not. Any one station has too small a share of its local market. Even the largest share reported in Table 1, WJAR's share of broadcast television viewers in Providence-New Bedford, is approximately one third. Moreover, because cable channels clearly compete with broadcast channels for the majority of households, that figure—which excludes cable and direct-to-the-home satellite channels—understates the degree of competition.[16]

20. Turning to overall market concentration, one can calculate an HHI for each local market using each of the three share measures described above. These results are reported in Table 2.

---

[16] Further, these figures do not reflect the fact that even a station with a small viewer share often transmits a signal that reaches as many households as the leading stations in its market. To a large extent, a station's share reflects the quality of its programming, not the physical characteristics of its signal. This fact raises a

Table 2
Herfindahl-Hirschman Indexes*

Market	Basis of Calculations: Share of Television Households	Share of Television Viewers	Share of Broadcast Television Viewers
New York City	594	911	1345
Indianapolis	622	1005	1732
Providence - New Bedford	607	895	2325

* See text for discussion of calculations.

conceptual issue as to whether audience shares are a proper measure of the degree to which a station is a bottleneck. This issue is addressed below by considering various measures of capacity shares.

21. Several caveats must be kept in mind when examining the figures reported in Table 2. First—and most important—because cable and direct-to-the-home satellite channels compete with broadcast channels for the majority of households, the HHIs calculated in the final column of Table 2 dramatically overstate the degree of concentration. Second, the HHI calculations in all three columns of numbers in Table 2 are overstated for various technical reasons.[17] Nevertheless, these HHI calculations demonstrate that even taking a narrow view of the product market, broadcast television markets are significantly less concentrated than are MVPD markets at the local level. Indeed, using household or television viewing shares, all three markets fall in a range generally considered "unconcentrated" by federal policymakers.[18]

B. A Given Cable System has Much Greater Capacity than Does Any Broadcast Station

22. Today, a broadcast television station carries only one programming stream. While in the future, broadcast stations may be able to multiplex, the technology is not currently deployed.[19] In contrast, a modern cable system can carry one hundred or more channels. Almost all cable

---

17 *All three measures:* Because the share data are reported for households and multi-television households may view multiple programs at one time, suppliers' calculated shares can sum to more than 100 percent. Thus, the resulting HHI calculations in all of the columns can be overstated as well.

First two measures: Ratings and television viewer shares were not available for cable channels and some broadcast stations in the three television markets. Thus, it was necessary to estimate the shares of the omitted cable and broadcast channels to calculate HHIs. This was done by assuming that as many omitted channels as possible had five percent shares. For example, the reported stations for New York City had shares totaling 77.3 percent. It was assumed that there were five omitted channels: four with shares of 5 percent each, and one with a share of 2.7 percent. Because it is extremely unlikely that any of the omitted channels had individual shares that large, this procedure leads to estimated HHIs that are too large.

Final measure: Station viewer share data were not available for some broadcast stations. Hence, they were not included in the denominator used to convert the reported stations' television viewer share into their broadcast television viewer shares. Thus, the calculated shares and resulting HHI's are biased upward.

18 See, for example, *Merger Guidelines*, §1.5. These guidelines set an HHI of 1000 as an upper bound for unconcentrated markets. For the reasons discussed in the previous footnote, an HHI calculation based on a full set of data would lead to a number less than 1000 for Indianapolis using television viewer shares as the base.

19 Even if a single station is able to broadcast multiple channels in the future, any one television station still will account for only a relatively small percentage of total broadcasting capacity in its viewing market—it's broadcast rivals will also have the ability to engage in multiplexing.

systems have 30 or more channels, and over 60 percent of systems carry at least 54 channels.[20] It follows that a single cable system has a much greater influence on program distribution than does a single broadcast station. Indeed, policymakers should take into account the fact that broadcast television stations themselves are dependent on cable system operators for carriage.

C. Cable Ownership is Much More Concentrated at a National Level

23. While viewing is local, national ownership concentration can be relevant for the analysis of competition in programming markets. The reason is that there are significant economies of scale in program production. Because of these scale economies, a program supplier has to consider the potential audience for its content on a national scale when making investment and marketing decisions. If a single owner controls a large percentage of the potential programming outlets on a national basis, it may be able to exert monopsony power.

24. The Commission's current rules allow a single owner to control cable systems serving 30 percent of all MVPD subscribers. The proposed merger of AT&T and Media One would create an entity presumably up against that limit.[21] Broadcast television ownership is much less concentrated at the national level than is cable ownership.

25. There are several ways to measure the extent to which a group owner of television stations controls a large share of access to viewers and thus might be able to exert monopsony power in the programming market. By any reasonable measure, however, any one group owner has control over only a very small portion of total broadcast television capacity and audience. Consider the following facts, each of which supports this conclusion:

---

[20] Warren Publishing, Inc., *Television & Cable Factbook*, Cable Volume No. 67, 1999 Edition, "Channel Capacity of Existing Cable Systems."

[21] The Commission recently found that TCI (now owned by AT&T) had 26.48 percent of all MVPD subscribers in 1998, while Media One had 6.32 percent (*Video Competition Report*, Table C-3).

- *Number of Stations:* Sinclair Broadcast Group, Inc. is the largest group owner measured in terms of the number of television stations controlled. Sinclair owns fewer than five percent of U.S. commercial television stations.[22] Similarly, Fox Television Stations, Inc. owns fewer than two percent of all stations.[23]

- *Audience:* Today, Fox Television Stations, Inc. is the largest broadcast television group owner measured by national reach. Fox owned and operated stations can in theory reach 40.6 percent of all U.S. television households.[24] Their actual viewing share is considerably lower. Recently, the average rating for the 22 Fox owned and operated stations over the total day was 3.7.[25] This figure indicates that on average Fox stations were actually viewed by 3.7 percent of the households these stations reached. Hence, the 22 Fox stations collectively were viewed by 1.5 percent of television households nationwide. Prime time figures are higher, but the bottom line for policy is the same. Average prime time ratings were 7.2, meaning that Fox owned and operated stations were viewed by 2.9 percent of U.S. television households.

- *Transmission Capacity:* Another way to measure whether a group owner has bottleneck control is to calculate its share of broadcast television transmission capacity.[26] Total capacity in a given local viewing area is equal to the number of broadcast channels times the number of television households in that local market. Total national transmission capacity is then equal to the sum across all of the local viewing areas. In 1998, Fox

---

22 Sinclair ownership data are provided in "1999's Top 25 Television groups," available 9 November 1999 at http://www.broadcastingcable.com/policy/policy_article.asp?articleID=692239775. The total number of stations is given in Warren Publishing, Inc., *Television & Cable Factbook,* Stations Volume No. 67, 1999 Edition, "Affiliations by Market," C-1.

23 "1999's Top 25 Television groups," available 9 November 1999 at http://www.broadcastingcable.com/policy/policy_article.asp?articleID=692239775 and Warren Publishing, Inc., *Television & Cable Factbook,* Stations Volume No. 67, 1999 Edition, "Affiliations by Market," C-1.

24 This figure represents the unadjusted reach of Fox stations (*i.e.,* the UHF discount has not been applied). This was done to take a conservative approach. "1999's Top 25 Television groups," available 9 November 1999 at http://www.broadcastingcable.com/policy/policy_article.asp?articleID=692239775.

25 Nielsen Media Research data for May 1999.

26 This is a conservative measure (*e.g.,* is weighted toward finding a competitive problem even if there is none) because it ignores competition from cable channels.

stations accounted for less than four percent of national broadcast television capacity for reaching viewers.

26. None of these figures represents an ideal measure of concentration. However, the story these data tell is so clear and consistent that there is no need to refine the measures.[27] All of the evidence points to the fact that no group owner possesses bottleneck control of access to viewers. And this conclusion would continue to hold even if the size of any group owner doubled or tripled under any of these measures.

27. Even if a single company owned one television station in each market, it would control less than nine percent of broadcast television capacity (as measured by channels times market size). If a company owned one television station in every market with eight or fewer stations and owned two stations in every market with nine or more stations (as could be allowed under the local ownership rules), it still would own less than 14 percent of total broadcast distribution capacity.

28. In contrast, if one company owned a cable system in each market, that company would own approximately 85 percent of the multichannel distribution capacity.[28] Concentrated ownership of cable systems is a much greater threat to program producers than is allowing a broadcaster to attain a broad national reach.

---

27 The Commission itself recently concluded that the "industry continues to be unconcentrated at the national level, with our estimate of the Herfindahl-Hirschman Index (HHI) still below 1000, increasing from 264 in 1996 to 308 in 1997." *In the matter of 1998 Biennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996,* Notice of Inquiry, MM Docket 98-35, released March 13, 1998, ¶ 15.

28 *Video Competition Report,* ¶ 128.

D. There is No Evidence that any Group Owner has Exercised Market Power to Limit the Supply of Programming to its Rivals.

29. Both the broadcast television and cable television national ownership limits are motivated by concern that an excessively large owner will be able to exert undue influence or exercise monopsony power in the programming market. If a firm possessed such monopsony power, it could be expected to take actions to preserve that power. One way to do so would be to restrict the supply of programming to service providers who actually or potentially compete with the firm possessing monopsony power. In theory, a firm possessing monopsony power could demand exclusive relationships with programmers that would limit the ability of rival distributors to obtain programming. Indeed, the Commission recently found that there is "credible evidence that indicates that MSOs have used their market power to cause unaffiliated programmers to refuse to sell their programming to other MVPDs."[29]

30. I am unaware of any such allegations against broadcast television group owners. Indeed, such an allegation would make no sense—given the competitive structure of broadcast television markets, a group owner could not have the market power to exercise.

IV. SUMMARY AND CONCLUSION

31. The Commission recently found that allowing increased concentration of cable system ownership is in the public interest. This finding is one more piece of evidence that it is in the public interest to relax or eliminate the broadcast television national multiple ownership rule. If a single owner can control cable systems covering 37 percent of the population without threatening diversity or competition, it follows that allowing a single owner to control television stations reaching 100 percent of the country would not threaten diversity or competition. This

---

[29] *Horizontal Ownership Third Report and Order*, ¶ 59.

conclusion derives from the fact that a station group with 100 percent reach still would have a national audience share (or channel capacity share) well less than an MSO with 37 percent coverage.

32. Of course, this finding is not the only basis for concluding that the broadcast television national multiple ownership cap should be eliminated. Economic and policy analyses—including those conducted by the Commission and its staff—have repeatedly found that the national multiple ownership rule does not serve the public interest.[30] As I have summarized elsewhere, the available data and economic analyses support the conclusions that:[31]

- Relaxation of the reach limit does not threaten competition and indeed can be expected to strengthen broadcast television networks as competitors.
- Diversity is relevant at the local level and is unaffected by the national cap.
- The cap is an expensive and ineffective means of promoting minority ownership.
- There is no evidence that a group owner whose stations collectively have broad national coverage is less committed to localism than is a group or individual station owner whose stations have more limited coverage.

33. The available data and economic analysis also support the conclusion that the national multiple ownership rule imposes social costs:

- The cap limits the realization of economies of scale and scope.
- The cap blocks expansion of particularly well-run station groups.

---

30 For a brief history of the Commission's treatment of the rule and a public interest analysis of the rule's effects, see *Katz White Paper* at 52-82.

31 *Ibid.*

- The cap limits the abilities of networks to coordinate with stations, and thus it reduces the incentives and abilities of networks to compete for programming and promote it.

By creating these artificial costs, the broadcast television national ownership cap reduces incentives to invest in non-subscription broadcast television. The public interest would best be served by immediate elimination of the national multiple ownership cap.

EXHIBIT A. CURRICULUM VITAE OF MICHAEL L. KATZ

EMPLOYMENT

July 1987 to present

Arnold Professor of Business Administration
Director, Center for Telecommunications and Digital Convergence
University of California at Berkeley

Joint appointment in the Economics Department and School of Business. Initial appointment as an associate professor July 1987. Promoted to full professor July 1989. Granted an endowed chair July 1995. Research on competitive strategy in systems markets, strategic standard setting, public policy in networks markets, telecommunications pricing and policy, strategic alliances, and cooperative research and development. Chaired Strategic Planning Committee, Policy and Planning Committee, Affirmative Action Committee, and the Economic Analysis and Policy Group. Teach MBA courses in business strategy and microeconomics, and doctoral courses in accounting and microeconomics. Author of economics textbook.

January 1994 to January 1996

Chief Economist
Federal Communications Commission

Responsible for integrating economic analysis into all aspects of Commission policy making. Reported directly to the Chairman of the Commission. Formulated and implemented regulatory policies for all industries under Commission jurisdiction, including cable and broadcast television, and local, long distance, and wireless telephony. Managed teams of lawyers and economists to design regulatory policies and procedures. Significantly strengthened Commission's ability to gather industry data and conduct empirical studies. Extensive public speaking to specialist and general audiences in the United States and abroad.

July 1981 to June 1987

Assistant Professor of Economics
Princeton University

Research on sophisticated pricing, standards development, cooperative R&D, and intellectual property licensing. Served as Assistant Director of Graduate Studies. Taught courses in microeconomics, industrial organization, and antitrust and regulation to undergraduate and doctoral students.

EDUCATION

D.Phil. 1982
Oxford University
Doctorate in Economics. Thesis on market segmentation and sophisticated pricing strategies.

A.B. *summa cum laude* 1978
Harvard University
As an undergraduate, completed all courses and general examinations for doctorate in economics.

AWARDS AND HONORS

Chairman's Special Achievement Award, Federal Communications Commission, 1996.
The Earl F. Cheit Outstanding Teaching Award, Berkeley, 1992-1993 and 1988-1989.
Honorable Mention, 1996-1997.
Alfred P. Sloan Research Fellow, 1985-1988.
National Science Foundation Graduate Fellow, 1978-1981.
John H. Williams Prize (awarded to the Harvard College student graduating in Economics with the best overall record), 1978.
National Merit Scholar, 1975-1976.

GRANTS

Berkeley Committee on Research Grant, 1996-1997.
Berkeley Program in Finance Research Grant, 1990.
Researcher, Pew Foundation grant: "Integrating Economics and National Security," 1987-1990.
Principal Investigator, National Science Foundation grants:
"A More Complete View of Incomplete Contracts," joint with Benjamin E. Hermalin, 1991-1993.
"Game-Playing Agents and the Use of Contracts as Precommitments," 1988-1989.
"The Analysis of Intermediate Goods Markets: Self-Supply and Demand Interdependence," 1985-1986.
"Imperfectly Competitive Models of Screening and Product Compatibility," 1983-1984.
"Screening and Imperfect Competition Among Multiproduct Firms," 1982.

PROFESSIONAL ACTIVITY

Member of editorial boards of *California Management Review* and *Journal of Economics and Management Strategy.*

PUBLICATIONS

"Multiplant Monopoly in a Spatial Market," *Bell Journal of Economics* Vol. 11, No. 2 (Autumn 1980).

"Non-uniform Pricing, Output and Welfare Under Monopoly," *Review of Economic Studies* Vol. L, No. 160 (January 1983).

"A General Analysis of the Averch-Johnson Effect," *Economic Letters* Vol. 11, No. 3 (1983).

"The Socialization of Commodities," co-authored with L.S. Wilson, *Journal of Public Economics* Vol. 20, No. 3 (April 1983).

"The Case for Freeing AT&T," co-authored with Robert D. Willig, *Regulation* (July/August 1983) and "Reply to Tobin and Wohlstetter," *Regulation* (November/December 1983).

"Plea Bargaining and Social Welfare," co-authored with Gene M. Grossman, *American Economic Review* Vol. 73, No. 4 (September 1983).

"Firm-Specific Differentiation and Competition Among Multiproduct Firms," *Journal of Business* Vol. 57, No. 1, Part 2 (January 1984).

"Nonuniform Pricing with Unobservable Numbers of Purchases," *Review of Economic Studies* Vol. LI (July 1984).

"Price Discrimination and Monopolistic Competition," *Econometrica* Vol. 52, No. 6 (November 1984).

"Tax Analysis in an Oligopoly Model," co-authored with Harvey S. Rosen, *Public Finance Quarterly* Vol. 13, No. 1 (January 1985).

"Network Externalities, Competition, and Compatibility," co-authored with Carl Shapiro, *American Economic Review* Vol. 75, No. 3 (June 1985).

"On the Licensing of Innovations," co-authored with Carl Shapiro, *Rand Journal of Economics* Vol. 16, No. 4 (Winter 1985).

"Consumer Shopping Behavior in the Retail Coffee Market," co-authored with Carl Shapiro, in *Empirical Approaches to Consumer Protection* (1986).

PUBLICATIONS continued

"Technology Adoption in the Presence of Network Externalities," co-authored with Carl Shapiro, *Journal of Political Economy* Vol. 94, No. 4 (August 1986).

"How to License Intangible Property," co-authored with Carl Shapiro, *Quarterly Journal of Economics* Vol. CI (August 1986).

"An Analysis of Cooperative Research and Development," *Rand Journal of Economics* Vol. 17, No. 4 (Winter 1986).

"Product Compatibility Choice in a Market with Technological Progress," co-authored with Carl Shapiro, *Oxford Economic Papers: Special Issue on Industrial Organization* (November 1986).

"The Welfare Effects of Third-Degree Price Discrimination in Intermediate Goods Markets," *American Economic Review* Vol. 77, No. 2 (March 1987).

"R&D Rivalry with Licensing or Imitation," co-authored with Carl Shapiro, *American Economic Review* Vol. 77, No. 3 (June 1987).

"Pricing Publicly Provided Goods and Services," in *The Theory of Taxation for Developing Countries*, D.M. Newbery and N.H. Stern (eds.), Washington, D.C.: World Bank (1987).

"Vertical Contractual Relationships," in *The Handbook of Industrial Organization*, R. Schmalensee and R.D. Willig (eds.), Amsterdam: North Holland Publishing (1989).

"R&D Cooperation and Competition," co-authored with Janusz A. Ordover, *Brookings Papers on Economic Activity: Microeconomics* (1990).

Intermediate Microeconomics, co-authored with Harvey S. Rosen, Burr Ridge, IL: Richard D. Irwin (1st ed. 1991, 2nd ed. 1994, 3rd ed. 1997).

"Game-Playing Agents: Unobservable Contracts as Precommitments," *Rand Journal of Economics* Vol. 22, No. 3 (Autumn 1991).

"Moral Hazard and Verifiability: The Effects of Renegotiation in Agency," co-authored with Benjamin E. Hermalin, *Econometrica* Vol. 59, No. 6 (November 1991).

"Product Introduction with Network Externalities," co-authored with Carl Shapiro, *Journal of Industrial Economics* Vol. XL, No. 1 (March 1992).

PUBLICATIONS continued

"Defense Procurement with Unverifiable Performance," co-authored with Benjamin E. Hermalin, in *Incentives in Procurement Contracting*, J. Leitzel and J. Tirole (eds.), Boulder, Colorado: Westview Press (1993).

"Judicial Modification of Contracts Between Sophisticated Parties: A More Complete View of Incomplete Contracts and Their Breach," co-authored with Benjamin E. Hermalin, *Journal of Law, Economics, & Organization* Vol. 9, No. 2 (1993).

"Systems Competition and Network Effects," co-authored with Carl Shapiro, *Journal of Economic Perspectives* Vol. 8, No. 2 (Spring 1994).

"Joint Ventures as a Means of Assembling Complementary Inputs," *Group Decision and Negotiation* Vol. 4, No. 5 (September 1995). Also printed in *International Joint Ventures: Economic and Organizational Perspectives.*

"Interconnecting Interoperable Systems: The Regulator's Perspective," co-authored with Gregory Rosston and Jeffrey Anspacher, *Information, Infrastructure and Policy,* Vol. 4, No. 4 (1995).

"Interview with an Umpire," in *The Emerging World of Wireless Communications,* Annual Review of the Institute for Information Studies (1996).

"An Analysis of Out-of-Wedlock Childbearing in the United States," co-authored with George Akerlof and Janet Yellen, *Quarterly Journal of Economics*, Vol. 111, No. 2 (May 1996).

"Remarks on the Economic Implications of Convergence" *Industrial and Corporate Change,* Vol. 5, No. 4 (1996).

"Regulation to Promote Competition: A first look at the FCC's implementation of the local competition provisions of the telecommunications act of 1996," co-authored with Gerald W. Brock, *Information Economics and Policy,* Vol. 9, No. 2 (1997).

"Ongoing Reform of U.S. Telecommunications Policy," *European Economic Review,* Vol. 41 (1997).

"Economic Efficiency, Public Policy, and the Pricing of Network Interconnection Under the Telecommunications Act of 1996," in *Interconnection and the Internet: Selected Papers from the 1996 Telecommunications Policy Research Conference,* G. Rosston and D. Waterman (eds.), Mawah, New Jersey: Lawrence Erlbaum Associates, Publishers (1997).

CERTIFICATE OF SERVICE

I certify that the foregoing Emergency Petition for Relief and Supplemental Comments of Fox Television Stations, Inc. was served this 18th day of November 1999, via hand delivery upon:

Office of Commissioner Harold Furchtgott-Roth Federal Communications Commission 445 12th Street, SW Room 8A302C Washington, DC 20554	Office of Commissioner Susan Ness Federal Communications Commission 445 12th Street, SW Room 8B115H Washington, DC 20554
Office of Commissioner Gloria Tristani Federal Communications Commission 445 12th Street, SW Room 8C302C Washington, DC 20554	Office of Commissioner Michael Powell Federal Communications Commission 445 12th Street, SW Room 8A204C Washington, DC 20554
Office of Chairman William Kennard Federal Communications Commission 445 12th Street, SW Room 8B201H Washington, DC 20554	Thomas Power Senior Legal Advisor Office of Chairman Kennard Federal Communications Commission 445 12th Street, SW Room 8B201 Washington, DC 20554
Marsha J. MacBride Legal Advisor Office of Commissioner Powell Federal Communications Commission 445 12th Street, SW Room 8A204 Washington, DC 20554	Helgi Walker Senior Legal Advisor & Chief of Staff Mass Media and Cable Matters Office of Commissioner Furchtgott-Roth Federal Communications Commission 445 12th Street, SW Room 8A302F Washington, DC 20554
Tom Krattenmaker Director of Research Office of Plans & Policy Federal Communications Commission 445 12th Street, SW Room 7C324 Washington, DC 20554	Susan L. Fox Deputy Chief Mass Media Bureau Federal Communications Commission 445 12th Street, SW Room 8B201 Washington, DC 20554

Kathryn Brown Chief of Staff Office of Chairman Kennard Federal Communications Commission 445 12th Street, SW Room 8B201E Washington, DC 20554	Rick Chessen Legal Advisor Office of Commissioner Tristani Federal Communications Commission 445 12th Street, SW Room 8C302E Washington, DC 20554
Bob Pepper Chief Office of Plans & Policy Federal Communications Commission 445 12th Street, SW Room 7C450 Washington, DC 20554	Howard Shelanski Chief Economist Office of Plans & Policy Federal Communications Commission 445 12th Street, SW Room 7C450 Washington, DC 20554
Mary Beth Murphy Policies & Rules Division Mass Media Bureau Federal Communications Commissions 445 12th Street, SW Room 8C723 Washington, DC 20554	Roy Stewart Chief Mass Media Bureau Federal Communications Commission 445 12th Street, SW Room 2C347 Washington, DC 20554
David Goodfriend Federal Communications Commission 445 12th Street, SW Room 8B115 Washington, DC 20554	

DCDOCS:161122.1(3GBM01!.DOC)