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PAUL KARPOWICZ
VICE PRESIDENT
TELEVISION

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AUG 29 2000
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August 28, 2000

Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth St. SW
Washington DC 20554

Re: The Dual Network Rule, MM Docket No. 00-108

Dear Ms. Salas:

On behalf of LIN Television Corporation ("LIN"), I am writing to support amendment of the Commission's dual network rule, Section 73.868(g), to permit ownership of the UPN or WB networks by any of the established networks.

LIN owns or operates through LMAs or management agreements 16 full-power broadcast television stations in 11 markets. These stations are affiliated with all four of the established networks. In addition two LIN stations are affiliated with the WB. One of those stations, WBNE, Channel 59, in New Haven, Connecticut, will become a UPN affiliate in January, 2001.

In addition, LIN has created a "station" in Grand Rapids, Michigan, consisting of five low power television stations covering each of the major municipalities in that market. This station is affiliated with UPN and also carries a variety of local and regional sports programming as well as time-shifted rebroadcasts of local newscasts. While the station covers most of the households in the market, it operates at a severe technical disadvantage to the other stations in the market. Without a network affiliation, the attendant increases in programming and promotional expenses would be a very difficult economic proposition. To replace UPN, the station would have to purchase ten more hours of primetime programming a week, as well as a block of children's educational/informational programming to replace the Disney programming made available by UPN, and engage in extensive additional promotion which UPN branding and marketing now makes unnecessary.

UPN literally makes it possible for LIN to provide an additional programming voice in the Grand Rapids market, one that also carries a rich array of local programming. But this new station also makes it possible for UPN to have an outlet in Grand Rapids, where there are no additional full-power commercial stations unaffiliated with the other five networks. Similarly, in New Haven, Channel 59, which is operated by LIN through an LMA, is a marginally viable station, even as the affiliate of a new "weblet", now WB, and even operated with the efficiencies of an LMA. (Channel 59 is exchanging affiliations with the current UPN affiliate as the result of a change in ownership at the other station.) Without the benefits the station receives from network programming and promotion, the market could well be deprived of another programming voice, one which also includes an original local primetime newscast and other local and regional sports programming. The clear winners in these synergistic arrangements are the viewers in the Grand Rapids and New Haven-Hartford markets who now have an important new local/national programming option.

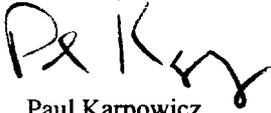
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List A B C D E

LIN has partnered extensively and successfully over the years with both Paramount, one of the original joint venturers in UPN, and CBS. Both companies have rich broadcast histories and storied programming expertise. It is our belief that Viacom's acquisition of CBS holds forth the promise that UPN will develop into a truly meaningful and enduring programming presence, significantly enhancing both competition and diversity in the national programming marketplace, and enabling LIN to better serve its local markets.

It is also true that continuing and enhancing the competitive presence of UPN will provide additional competition for LIN stations in its markets other than Grand Rapids and New Haven. But LIN believes that this additional voice will strengthen our free and universally available broadcast medium in its overarching intermodal struggle with multichannel pay services such as cable and DBS and that all local broadcast outlets and local broadcast consumers ultimately will benefit.

For all these reasons, I urge the Commission to amend the dual network rule to permit Viacom to continue to operate both UPN and CBS.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Karpowicz". The signature is stylized and written in a cursive-like font.

Paul Karpowicz
Vice President, Television
LIN Television Corporation

cc: Chairman William Kennard
Commissioner Susan Ness
Commissioner Harold Furchtgott-Roth
Commissioner Michael Powell
Commissioner Gloria Tristani
Roy Stewart, Chief, Mass Media Bureau