**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, D.C. 20554**

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| In the Matter of | |
| Cross-Ownership of Broadcast Stations and Newspapers | MM Docket No. 01-235 |
| Newspaper/Radio Cross-Ownership Waiver Policy | MM Docket No. 96-197 |
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**COMMENTS OF BELO CORP.**


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December 3, 2001

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**COMMENTS OF BELO CORP.**

## I. INTRODUCTION AND SUMMARY

Belo Corp. hereby submits its Comments in response to the Commission's *Order and Notice of Proposed Rulemaking* in the above-captioned proceedings, initiated in order to reconsider the agency's twenty-six year old ban on newspaper/broadcast cross-ownership.[1] Belo Corp. supports repeal of this long-outdated restriction. As Belo Corp. explained in its Comments submitted in connection with the agency's 1998 biennial review proceeding and as further demonstrated herein,[2] Belo Corp.'s long-term experience as the owner and operator of a newspaper/broadcast combination in the Dallas/Fort Worth market provides an excellent case study of the significantly enhanced informational services that news organizations can offer to the public if given the opportunity to fully utilize their newspaper and broadcasting resources.

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[1] *Cross-Ownership of Broadcast Stations and Newspapers; Newspaper/Radio Cross-Ownership Waiver Policy*, MM Docket Nos. 01-235, 96-197 (rel. September 20, 2001) ("*NPRM*").

[2] Comments of A.H. Belo Corporation, MM Docket No. 98-35, July 21, 1998 ("1998 Comments"). Belo Corp.'s Comments in the 1998 biennial review proceeding are hereby incorporated by reference. For convenience, a copy is attached hereto as Appendix I.

Based upon its experience in the Dallas marketplace, Belo Corp. further submits that the extraordinary abundance of information sources that exist in the current media marketplace has rendered the agency's diversity-based rationale for the newspaper/broadcast cross-ownership ban entirely superfluous. By continuing to discriminate against broadcasters and newspapers in today's fast-paced and rapidly converging media marketplace, the Commission will only deprive consumers of the improved coverage of local news, public affairs, and other important issues that Belo Corp. and other high-quality news organizations can bring to the public. Accordingly, the Commission should act expeditiously to repeal the obsolete and counterproductive newspaper/broadcast cross-ownership prohibition.

## II. BELO CORP.

Belo Corp. is one of the nation's leading media and news organizations, with a diversified group of market-leading broadcasting, publishing, cable, and interactive media assets. Among Belo Corp.'s most prominent news outlets are those based in the Dallas/Fort Worth area. Belo Corp. has owned and operated *The Dallas Morning News*, its flagship newspaper publication, since 1885. Today, the publication has the seventh largest Sunday circulation and tenth largest daily circulation in the nation. In 1950, Belo Corp. entered the television broadcasting industry through its acquisition of ABC affiliate WFAA-TV. Through its common ownership of WFAA-TV and *The Dallas Morning News*, Belo Corp. has continuously owned and operated a newspaper/broadcast combination in the Dallas market for more than fifty years.[3]

Belo Corp.'s broadcast division currently consists of 18 television stations reaching approximately 14 percent of U.S. television households, including six stations in the top twenty

[3] This combination was grandfathered by the FCC in the 1975 proceeding in which the newspaper/broadcast cross-ownership prohibition was adopted.

markets. Belo Corp.'s publishing division comprises four daily newspapers with a combined circulation exceeding 800,000 daily and 1.2 million on Sunday. In addition to *The Dallas Morning News*, Belo Corp. publishes *The Providence Journal* in Providence, Rhode Island; *The Press-Enterprise* in Riverside, California; and *The Denton Record-Chronicle* in Denton, Texas.

Belo Interactive, Inc., the Company's Internet subsidiary, oversees the web site operations of all Belo Corp. television stations and newspaper publications, the Company's interactive alliances and partnerships, and a variety of Internet-based products and services. Belo Corp. also owns or operates six local or regional cable news channels, including Texas Cable News ("TXCN") based in Dallas/Fort Worth, NorthWest Cable News in Seattle/Tacoma, and Arizona News Channel in Phoenix.[4]

The Company has invested the resources necessary to provide extensive local news, public affairs, and community-oriented coverage and to develop its media outlets into news and information franchises of the highest caliber. Largely as a result of this dedication to journalistic excellence, the majority of Belo Corp.'s television stations consistently rank first or second in their markets according to Nielsen ratings. In recognition of their outstanding local news coverage, the stations have garnered a number of local, state, and national awards including 11 George Foster Peabody awards, 14 Edward R. Murrow awards, and 15 Alfred I. DuPont-Columbia University awards. The publishing division also has been recognized repeatedly for its commitment to high quality news and informational coverage with numerous awards including 11 Pultizer Prizes.

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[4] Belo Corp. also owns/operates through joint ventures Local News on Cable in Hampton/Norfolk, Virginia and NewsWatch on Channel 15 in New Orleans, Louisiana. Likewise, Belo Corp. has formed Mas Arizona, the Southwest region's first Spanish language cable news channel, through a joint venture with Cox Communications. Through similar ventures with Time Warner Cable, Belo Corp. plans to launch local cable news channels in Charlotte, Houston, and San Antonio in early 2002.

## III. BELO CORP.'S CO-OWNERSHIP OF WFAA-TV AND *THE DALLAS MORNING NEWS* PROVIDES AN EXCELLENT EXAMPLE OF THE SUPERIOR SERVICE THAT JOINTLY-OWNED NEWSPAPERS AND BROADCAST STATIONS CAN PROVIDE TO THE PUBLIC

The ability of both WFAA-TV and *The Dallas Morning News* to provide the public with consistently high levels of service and outstanding news coverage has been fostered by the opportunity to draw on the combined resources of the station and the newspaper and to make use of company-wide service offerings. The sharing of resources between the two entities has a number of practical applications. Although *The Dallas Morning News* and WFAA-TV have maintained independent editorial voices and separate news staffs,[5] information is shared between the assignment desks of the two news outlets. Both entities consequently are able to cover a wider range of news stories.

For instance, reporters at WFAA-TV and *The Dallas Morning News* often take turns covering jury deliberations, either alerting their counterparts when a verdict is reached or providing full coverage for both the newspaper and the station. Because only one reporter typically is assigned to this type of story, another reporter is freed to cover an additional story of local interest. The pooling of newsgathering resources also provides an opportunity for enhanced international coverage. By way of example, *The Dallas Morning News* reporters covering the war in Afghanistan are equipped with satellite videophones, making it possible for them to provide WFAA-TV with stories directly from the front lines.

In addition, *The Dallas Morning News* and WFAA-TV both make use of Belo Corp.'s Capital Bureau. Opened in 1997, the Capital Bureau houses the Washington-based staff of both *The Dallas Morning News* and WFAA-TV, as well as the personnel of Belo Corp.'s other

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[5] *See* 1998 Comments, at 20-22.

broadcast and publishing outlets, and includes a full television studio.[6] By giving its news outlets the resources to provide first-hand, full-time coverage to issues of national importance, the Capital Bureau enhances the capability of Belo Corp.'s television stations and newspapers to add an all-important national perspective to their local news and informational services. Moreover, through their operations at the Capital Bureau, WFAA-TV and *The Dallas Morning News* are able to combine resources at the national level. While day-to-day television coverage in Washington, D.C. primarily is done by WFAA-TV reporters assigned to the Bureau, it is now common practice for reporters at *The Dallas Morning News* to appear on newscasts from the Capital Bureau. Likewise, Bureau reporters for WFAA-TV have begun to file stories for *The Dallas Morning News*.

WFAA-TV and *The Dallas Morning News* also have benefited from their joint ability to rely on Belo Marketing Solutions ("BMS"), a sales division established to provide Belo Corp.'s advertising customers with integrated marketing solutions through the combined capabilities of Belo Corp.'s properties in the Dallas/Fort Worth area.[7] BMS packages the strength of Belo Corp.'s television, newspaper, cable news, and interactive media assets within Dallas/Fort Worth and provides advertisers with integrated marketing solutions—while providing Belo Corp. the ability to achieve operating efficiencies. Advertisers receive numerous benefits from the combination, as demonstrated by the cross-platform advertising done for opening day of this year's baseball season in Dallas. WFAA-TV aired a prime-time special on the new season in conjunction with a special edition published by *The Dallas Morning News*. Similarly,

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[6] *See* Belo Names George Rodrigue Vice President of the Belo Capital Bureau in Washington, D.C. (News Release of Belo Corp.), December 4, 2000.

[7] *See* Belo Marketing Solutions Formed to Offer Advertisers New Integrated Marketing Solutions (News Release of Belo Corp.), March 7, 2000. Belo Marketing Solutions also provides integrated advertising services to Belo Corp.'s cluster of media outlets in the Pacific Northwest.

advertisers benefited from drawing on the strength of both entities in connection with the opening of a new light rail service in Dallas. *The Dallas Morning News* published an educational supplement highlighting the benefits of mass transit simultaneously with WFAA-TV's production of a half-hour special on the same subject.

*The Dallas Morning News* and WFAA-TV also have made use of combined resources to bring an additional news outlet to the Dallas area—Texas Cable News ("TXCN"). Launched in 1999, TXCN is a 24-hour cable news network currently serving approximately one million viewers in Texas.[8] Although TXCN has independent news-gathering sources, it also draws on the resources of all four of Belo Corp.'s Texas television stations, including WFAA-TV. Moreover, reporters from *The Dallas Morning News* frequently appear on the network, providing coverage of a wide range of news and informational topics. Through its access to Belo Corp.'s Texas news outlets, TXCN has the flexibility to offer both statewide news and local coverage for Dallas, Houston, and San Antonio.

Belo Corp.'s heritage as a news organization with a strong commitment to the local communities it serves and its ability to draw on a wide range of resources unquestionably have yielded dividends in terms of the quality of service produced by both *The Dallas Morning News* and WFAA-TV. *The Dallas Morning News* has a long history of providing superlative local news, information, and community service. As described in Belo Corp.'s 1998 Comments, the newspaper has been honored with six Pulitzer prizes.[9] Since then, the publication has been recognized with a number of additional honors and awards. WFAA-TV has earned a similarly first-rate reputation. As Belo Corp. described in its 1998 Comments, WFAA-TV is a well-

[8] *See* Time Warner Cable and Belo to Create 24-Hour Cable News Channel in Charlotte, North Carolina (News Release of Belo Corp.), July 18, 2001.

[9] *See* 1998 Comments, at 18.

established leader among broadcasters in the Dallas market.[10] Largely because of the strength of its dedication to news and informational programming, the station has been ranked as number one in its market for the past thirteen years. WFAA-TV also consistently provides the highest amount of news and other non-entertainment programming of any of the network-affiliated stations in the Dallas market.[11] The station's reputation for outstanding informational programming has been recognized through numerous awards. In addition to the five duPont-Columbia awards and the five George Foster Peabody awards noted in Belo Corp.'s 1998 Comments, WFAA-TV has since been honored with a host of additional awards, including two national and five regional Edward R. Murrow awards.[12]

In sum, the benefits that both WFAA-TV and *The Dallas Morning News* have derived from their affiliation with an organization dedicated to the provision of local news and information and the ability to make use of common resources are clearly manifested through the consistent records of outstanding service and public approval that both entities have achieved. Belo Corp.'s joint operation of *The Dallas Morning News* and WFAA-TV thus provides an excellent example of the high-quality and enhanced services that joint newspaper/broadcast operations can bring to consumers. As explained in greater detail below, but for the anachronistic newspaper/broadcast ownership restriction, Belo Corp. and other highly qualified news organizations would be able to replicate this level of service in additional markets.

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[10] *Id.*, at 18-20.

[11] *See id.*, at 19, Appendix A.

[12] *See* Ken Parish Perkins, *Channel 8 double winner of Murrows*, Fort Worth Star Telegram, September 15, 2000; *The Hollywood Reporter*, March 27, 2000; 1998 Comments, at 19.

## IV. AN ANALYSIS OF THE HIGHLY COMPETITIVE DALLAS MARKET SHOWS THAT REPEAL OF THE RULE WILL HAVE NO NEGATIVE IMPACT ON COMPETITION

The Commission has acknowledged repeatedly—including in its *Notice of Proposed Rulemaking* in the instant proceeding—that the local media marketplace has changed "dramatically" since the agency adopted the newspaper/broadcast cross-ownership rule over twenty-five years ago.[13] As demonstrated in detail in the Comments submitted by the Newspaper Association of America in this proceeding,[14] the local environment has evolved in the years since 1975 from one in which consumers had a mere handful of mass media outlets to choose from to one in which there is an abundance of information outlets and an extraordinary range of viewpoints available.

Thus, a wide range of media outlets now offer comprehensive news and informational coverage—including multichannel video programming distributors and the Internet, in addition to a multiplicity of more traditional broadcast and print options. Belo Corp. submits that all of these options should be taken fully into account in the Commission's reassessment of the still unproven diversity-based rationale behind the newspaper/broadcast cross-ownership restriction. With the phenomenal range of information sources available in today's media marketplace, the agency unquestionably will find that common ownership of newspapers and broadcast stations could not have any appreciable negative impact on either local diversity or competition.

This certainly has proven to be the case in the Dallas market. As Belo Corp. demonstrated in its Comments in the 1998 biennial review, Belo Corp.'s common ownership of *The Dallas Morning News* and WFAA-TV has had no noticeable impact on the intense level of

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[13] *NPRM*, at ¶ 8.

[14] *See* Comments of the Newspaper Association of America, Appendix, MM Docket Nos. 01-235, 96-197, December 3, 2001 ("NAA Comments").

diversity and competition in the Dallas/Fort Worth marketplace.[15] Indeed, the local marketplace has grown even more diverse since Belo Corp.'s last showing in this proceeding. For example, in addition to WFAA-TV, there are now 17 other television stations competing for audience share in the Dallas/Forth Worth Designated Market Area ("DMA") with 14 separate owners.[16] Even more impressive, 102 radio stations with 54 separate owners currently offer an incredible diversity of program formats in the DMA.[17]

In addition, the Dallas area continues to be served by numerous daily newspapers.[18] National newspaper publications—such as *USA Today* and the *Wall Street Journal*—are additional formidable competitors. While the cable penetration rate has continued to hover around 50 percent in the Dallas market, subscribers to Direct Broadcast Satellite ("DBS") services have soared to 19.4 percent in the area within the past few years.

In short, despite Belo Corp.'s longstanding cross-ownership of a leading daily newspaper and a top television outlet in Dallas/Fort Worth, the market undeniably is served by a wealth of news and information outlets that offer consumers and advertisers virtually limitless choices. As this Dallas example clearly shows, whatever merit the cross-ownership ban may have had in 1975, it can no longer be seriously questioned that the FCC's original diversity-based justification for the restriction has been wholly eroded.

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[15] *See* 1998 Comments, at 29-32.

[16] Broadcasting & Cable Yearbook 2001, at B-178, B-74 – B-81; Television & Cable Factbook 2001, at A-1172 – A-1293.

[17] BIA Financial Network Report, November 2001.

[18] *See* Editor & Publisher's Yearbook 2001, at I-418 – I-445.

## V. BY SINGLING OUT NEWSPAPERS AND BROADCAST STATIONS, THE RULE IRRATIONALLY PROHIBITS BELO CORP. AND SIMILAR HIGHLY QUALIFIED NEWS ORGANIZATIONS FROM BRINGING THE BENEFITS OF NEWSPAPER/BROADCAST CO-OWNERSHIP TO ADDITIONAL MARKETS

Notwithstanding the concrete and recognized benefits of newspaper/broadcast cross-ownership and the lack of evidence of competitive harm, the FCC continues to single out newspaper publishers and broadcast station licensees and to preclude them from realizing the proven efficiencies and undeniable public interest benefits associated with common ownership.

The newspaper/broadcast rule was adopted as part of a series of cross-ownership restrictions enacted in the 1960s and 1970s that generally were aimed at preventing a single owner from controlling more than one media outlet in a given local market. As Belo Corp. explained in its 1998 Comments, with the glaring exception of the newspaper/broadcast rule, virtually every other major limitation on broadcast ownership has since been either eliminated or greatly relaxed.[19] That trend certainly has continued since Belo Corp.'s prior submission.[20] Moreover, most other competitors in today's information marketplace—including online service providers, cable system operators and programmers, DBS providers, local and long-distance telcos, software providers, and magazine publishers—are generally free to enter into combinations with broadcasters and newspapers.

Belo Corp. has been barred since 1975 from offering in any other market the full range of enhanced services and informational coverage that it has been able to offer in Dallas. Belo

[19] *See* 1998 Comments, at 22-24. *See also* NAA Comments, at Section IV(C).

[20] In 1999, for example, the Commission significantly relaxed two more longstanding restrictions on local television ownership—the "one-to-a-market" rule and the "duopoly" rule. *See generally Review of the Commission's Regulations Governing Television Broadcasting*, 14 FCC Rcd. 12903 (1999). While the one-to-a-market rule originally was adopted as an absolute ban on common ownership of a television and a radio station in the same local community, the modified version allows licensees to own two television stations and up to six radio stations in the same market, or a single television station and as many as seven radio outlets. *Id.* at 12908. The "duopoly" rule originally prohibited ownership of more than one television station within a local market. Under the relaxed version of the rule, however, broadcasters are permitted to own two television stations in many markets. *Id.* at 12907-08.

Corp.'s publication of *The Press Enterprise*, its daily newspaper serving Riverside County and the inland Southern California area, provides an illustrative case in point. By combining the resources of *The Press-Enterprise* with a local television station, Belo Corp. would have the capacity to provide higher quality services through both outlets. A cross-ownership opportunity in Riverside also would permit Belo Corp. to become a more potent competitor in the greater Los Angeles market. Because virtually all of the television stations in the Los Angeles market have Grade A contours encompassing Riverside,[21] however, the rule prohibits Belo Corp. from acquiring any of the stations in this expansive market. By contrast, in this same market in which Belo Corp. is flatly precluded from owning any broadcast outlet, there are currently three television duopolies and nine companies holding the licenses of at least fivr radio stations.[22]

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[21] *See* Television & Cable Factbook 2001, at A-136 – A-157.

[22] BIA Financial Network Report, November 2001.

## VI. CONCLUSION

Belo Corp. urges the Commission to promptly eliminate its long-outdated and counterproductive restriction on newspaper/broadcast cross-ownership, thereby ceasing to single out newspapers and broadcasters from realizing the benefits inherent in media cross-ownership and allowing Belo Corp. and other highly qualified news organizations to bring enhanced news and informational services to the local marketplace.

Respectfully submitted,

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December 3, 2001

# APPENDIX I

ORIGINAL

**Before the**
**Federal Communications Commission**
**Washington, D.C. 20554**

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| In the Matter of | ) | |
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| 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 | ) ) ) ) | MM Docket No. 98-35 |

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July 21, 1998

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**SUMMARY**

When the Commission adopted regulations in 1975 prohibiting the future grant of an AM, FM, or television broadcast station license to any party "who directly or indirectly owns, operates or controls" a daily newspaper in the same community, the agency's justification for enacting an absolute bar on newspaper/broadcast cross-ownership was entirely speculative. Indeed, the FCC relied on what it admitted was a "mere hoped for gain in diversity" to support adoption of the rule. Moreover, in the same Order in which it adopted the prohibition, the Commission praised the "traditions of service" that newspaper publishers had established and maintained in the broadcast industry, concluding both that newspaper-owned stations typically offered superior programming services and that there was significant "separate operation" of jointly owned newspapers and television stations. A.H. Belo Corporation ("Belo" or the "Company"), through its own group ownership experiences, including those relating to its grandfathered combination of The Dallas Morning News and WFAA-TV in the Dallas market, demonstrates herein that the Commission's unsupported predictions were erroneous, and that the newspaper/broadcast cross-ownership restriction is neither appropriate nor necessary to serve the public interest.

Since its adoption of the newspaper/broadcast cross-ownership rule over two decades ago, the Commission has observed repeatedly that the synergies and economies of scale inherent in common ownership of mass media outlets generate a number of public interest benefits. The experiences of Belo substantiate these observations. With daily newspaper publications in six markets and seventeen network-affiliated television stations, Belo has become one the nation's largest and most diversified media companies. Throughout its 150-year history, the Company has remained strongly committed to providing quality news and

information. In recent years, through its capacity to call upon its broad range of media resources, Belo has been able to create such important newsgathering facilities and additional information outlets as its four cable news services and its ambitious news bureau in Washington, DC. Thus, Belo's experiences demonstrate that high levels of news and informational programming and innovative services are a natural outgrowth of the synergies inherent in joint ownership of media outlets.

Belo further submits that the superior service provided by, as well as the separate operation of, WFAA-TV and The Dallas Morning News illustrate that there is no legitimate public interest rationale for precluding common ownership of newspapers and broadcast stations. The success of The Dallas Morning News is built upon its commitment to offering local news and information of the highest caliber. WFAA-TV similarly has established itself as a leader among broadcasters in the Dallas-Fort Worth market. Largely because of its commitment to news and informational programming, WFAA-TV has consistently been ranked as the number one station in its market. Both the newspaper and the television station are highly motivated by both journalistic principles and marketplace forces, however, to maintain independent and competitive operations. Thus, Belo's combined ownership of The Dallas Morning News and WFAA-TV provides an excellent snapshot of the outstanding public service that jointly owned newspapers and broadcast stations can offer without posing any threat to the Commission's goal of safeguarding the diversity of editorial voices.

The explosive changes in the media marketplace over the past two decades have caused both Congress and the FCC to re-evaluate the validity of many of the agency's former cross-ownership rules. As a result of the Commission's own initiatives and the sweeping overhaul of ownership restrictions called for in the Telecommunications Act of 1996, newspaper publishers and broadcast licensees are now virtually alone in being barred from cross-ownership. Moreover, while countless other types of media combinations are entirely permissible, the Commission has been inflexible in its enforcement of the newspaper/broadcast cross-ownership ban, granting only three permanent waivers of the prohibition since its adoption over two decades ago. Newspaper owners and broadcasters thus are placed at a marked disadvantage in their ability to compete in today's diverse and ever-expanding multimedia marketplace.

That the combined ownership of a daily newspaper and a television station within a local market can hardly thwart the explosion of diversity that has occurred in the information marketplace is amply demonstrated by the highly competitive Dallas market. Despite Belo's continuous common ownership of a major daily newspaper (The Dallas Morning News) and a strong television station (WFAA-TV), the market remains robustly diverse and competitive. Indeed, the area currently is served by over 100 broadcast stations and more than fifty newspaper publications. In addition to these more traditional types of media, cable and other video programming providers, magazines, weekly and specialty newspapers, web outlets, direct mail advertising, and outdoor advertising services all compete for the market's advertising dollars.

In sum, Belo submits that the newspaper/broadcast cross-ownership rule has not served to achieve the "hoped for gain in diversity" that was the sole premise for the adoption of the rule. Rather, technological developments and marketplace forces have combined to create diversity and competition among information providers that would have been unimaginable in 1975. Repeal of this anachronistic prohibition will enable Belo and others to provide improved broadcast news and informational services and to develop innovative media outlets and information products to add to the already extensive diversity of the marketplace.

Accordingly, the Commission should promptly move beyond this "inquiry" and initiate a rulemaking proceeding to eliminate the newspaper/broadcast cross-ownership rule.

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| 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. | )<br>)<br>)<br>) | MM Docket No. 98-35 |

**COMMENTS OF A.H. BELO CORPORATION**

## I. INTRODUCTION/OVERVIEW

The Federal Communications Commission ("FCC" or "Commission") has undertaken this biennial review proceeding, pursuant to a Congressional mandate, in order to eliminate mass media ownership rules that are no longer necessary in the public interest. A.H. Belo Corporation ("Belo" or the "Company") hereby submits these comments in response to the Commission's Notice of Inquiry.[1] Belo urges the Commission to commence a rulemaking proceeding aimed at repealing its prohibition on common ownership of a daily newspaper and a broadcast station in the same market. As Belo demonstrates below through the example of its own group ownership experiences, and as further demonstrated in the comments submitted concurrently herewith by the Newspaper Association of America ("NAA") and the National

[1] 1998 Biennial Regulatory Review -- Review of the Commission's Broadcast Ownership Rules, MM Docket No. 98-35, FCC 98-37 (rel. March 13, 1998) ("Notice of Inquiry").

Association of Broadcasters ("NAB") in this proceeding, the synergies and economies of scale intrinsic to group ownership of media outlets lead to substantial public interest benefits.

Indeed, the record shows that jointly owned newspapers and television stations, including Belo's own combination in the Dallas market, have provided outstanding public service and have every incentive to operate independently. Belo further submits that because virtually all other participants in the information marketplace are free to take advantage of the operational synergies inherent in joint ownership, the cross-ownership ban unfairly singles out newspaper publishers and broadcast station licensees. Moreover, there is no logical reason to believe that opening markets to the cross-ownership of newspapers and broadcast stations will have a negative impact on competition. Thus, Belo respectfully submits that there is no legitimate public interest rationale for sustaining this discriminatory treatment of newspapers and broadcast stations, and that the Commission therefore is obligated to eliminate the newspaper/broadcast cross-ownership restriction.

## II. A.H. BELO CORPORATION

A.H. Belo Corporation is the oldest continuously operating business institution in Texas. Pioneered in 1842 as The Daily News, which was originally a one-page newspaper published in Galveston, Belo has grown to become one of the nation's leading media companies, with a diversified group of television and radio broadcasting, newspaper publishing, cable news, and electronic media assets. Currently, Belo owns seventeen network-affiliated television stations, reaching 14.2 percent of the television households in the United States. In addition to its flagship publication, The Dallas Morning News, and the associated Arlington Morning News, the Company currently publishes five other daily newspapers. Belo, directly or through joint ventures, also operates three local or regional cable news channels and will soon launch a fourth.

### A. The History of the Company

The origin of A.H. Belo Corporation can be traced to April 11, 1842, with the first edition of The Daily News in Galveston, Republic of Texas. Founded by Samuel Bangs, the Company was in the publishing business three years before Texas achieved statehood. In 1865, Alfred Horatio Belo joined the Company; he was made a full partner after only three months, under the firm name W. Richardson & Co. In 1870, the firm was renamed Richardson, Belo & Co. Upon the death of Mr. Richardson in 1876, Alfred Horatio Belo became the sole owner.

In 1885, Colonel Belo sent George Bannerman Dealey, who had joined The Daily News in 1874, to Dallas to establish a sister paper. The Dallas Morning News began publication on October 1, 1885, with Dealey as its General Manager. Colonel Belo died in 1901, and his son, who succeeded him as head of the Company, died five years later. Dealey continued to head the Company on behalf of the Belo heirs and, in 1926, acquired the Company, which was renamed A.H. Belo Corporation.

G.B. Dealey remained at the helm of the Company until his death in 1946. Robert W. Decherd, great-grandson of G.B. Dealey and currently the Company's President, Chairman, and Chief Executive Officer, has served in various capacities in the Company since 1973. In December 1981, Belo became a publicly traded entity, with its common stock traded on the New York Stock Exchange.

## B. The Publishing Division

As noted above, The Dallas Morning News began publication on October 1, 1885, with a circulation of 5,000 subscribers. While Belo has become one of the nation's largest diversified media companies, The Dallas Morning News remains the flagship of its newspaper business. The publication currently has a total circulation of 521,000 daily and 795,000 Sunday subscribers, constituting the country's eighth largest Sunday circulation and ninth largest daily circulation. As detailed below, the Company also publishes daily newspapers in five other markets. Today, the total circulation of Belo's daily publications approaches one million.

On December 26, 1995, Belo purchased The Bryan-College Station Eagle ("The Eagle"), a daily newspaper serving Bryan-College Station, Texas. Then, on January 5, 1996, Belo acquired the assets of the Messenger-Inquirer, a daily newspaper published in Owensboro, Kentucky. In January 1997, Belo acquired a 38.45 percent interest in The Press Enterprise, a daily newspaper serving Riverside County and the inland Southern California area. The Company purchased the remaining interest in the Press-Enterprise Company later that year.

Through the acquisition of the Providence Journal Company on February 28, 1997, Belo acquired the Providence Journal-Bulletin, the leading newspaper in Rhode Island and southeastern Massachusetts. The Journal-Bulletin, founded in 1829, is the nation's oldest major daily newspaper of general circulation that has been in continuous publication. On March 31, 1997, Belo acquired the assets of the Gleaner and Journal Publishing Company of Henderson, Kentucky, which included The Gleaner, a daily newspaper in Henderson, seven weekly newspapers, printing operations, and an AM radio station (WFKN) in Franklin, Kentucky.

## C. The Broadcasting Division

On June 26, 1922, Belo became a pioneer of the radio broadcasting industry when it began operating WFAA-AM, the first network station in the state of Texas.[2] Belo subsequently entered the television broadcasting industry in 1950 with the acquisition of ABC affiliate WFAA-TV in Dallas-Fort Worth. The station had begun operating five months earlier as KBTV-TV. For the past 15 years, WFAA-TV has been ranked as the number one station in its market.

In 1984, in the nation's largest broadcast acquisition to date, Belo acquired four network-affiliated stations: KHOU-TV (CBS) in Houston, Texas; KXTV (now ABC) in the Sacramento-Stockton-Modesto, California market; WVEC-TV (ABC) in Hampton-Norfolk, Virginia; and KOTV (CBS) in Tulsa, Oklahoma. In 1994, the Company added KIRO-TV in the Seattle-Tacoma, Washington market.

When Belo acquired The Providence Journal Company in February 1997 in the largest transaction in the Company's 155-year history, nine additional full-service stations were added to the television group. Of these, five were NBC affiliates: KING-TV, Seattle-Tacoma, Washington; KGW-TV, Portland, Oregon; WCNC-TV, Charlotte, North Carolina; KHNL-TV, Honolulu, Hawaii; and KTVB-TV, Boise, Idaho. Belo also gained one ABC affiliate (WHAS-TV in Louisville, Kentucky) as well as one CBS affiliate (KREM-TV in Spokane,

[2] The Company sold WFAA-AM and its other radio properties in 1987.

Washington) and two FOX affiliates (KASA-TV in Albuquerque-Santa Fe, New Mexico and KMSB-TV in Tucson, Arizona). In addition, Belo acquired control of NorthWest Cable News Network in Seattle-Tacoma and interests in two other cable network ventures. In connection with the acquisition of the Providence Journal Company, Belo also agreed to exchange KIRO-TV for KMOV-TV (CBS) in St. Louis, Missouri in order to come into compliance with the Commission's television duopoly rule in the Seattle-Tacoma market. Most recently, Belo acquired KENS-TV as well as KENS(AM) in San Antonio, Texas in exchange for another cable programming interest it had acquired from The Providence Journal Company.

Belo's Broadcast Division has emerged as an industry leader in recent years. The Company currently reaches 14.2 percent of all households nationwide through its seventeen full-service stations. In addition, three of Belo's stations are located in the top twelve markets, seven are in the top 30 markets, and twelve are in the top 50 markets.[3] Moreover, thirteen of Belo's seventeen full-service stations are ranked first or second in their respective markets. In terms of revenue and audience reach, Belo is now the third largest independent broadcaster in the United States.[4]

### D. Innovations and Contributions to the Public Interest

Over the course of its history, through editorial stands and civic involvement, Belo has had a significant and positive influence on the development of the state of Texas and the local communities in which it has operated. One of the most impressive examples of this editorial

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[3] Cable & Television Factbook, A-1 to A-2 (1998).

[4] See Television's Revamped Leadership: Special Report Top 25 TV Groups, Broadcasting & Cable, April 6, 1998, at 54.

influence began in May 1921, when The Dallas Morning News undertook a campaign to challenge the Ku Klux Klan, through editorials and constant news coverage of the group's activities and by endorsing anti-Klan candidates. These efforts culminated in the summer of 1924, when Miriam A. Ferguson was elected governor, defeating Klan candidate Judge Felix D. Robertson.

Belo has also been a national leader in the newspaper industry. The Galveston Daily News and The Dallas Morning News were the first two newspapers in the country to publish simultaneous editions as sister newspapers, thus demonstrating over a hundred years ago the benefits that can be achieved through common ownership of media properties. The two papers were linked across 315 miles by telegraph, and they shared a network of correspondents across the state. More recently, the reporting and editorial initiatives of The Dallas Morning News have earned the publication six Pulitzer Prizes since 1986. The recently acquired Providence Journal-Bulletin likewise lives up to the Company's high standards of journalistic excellence, having earned four Pultizer Prizes during its 168-year history.

Belo's commitment to news and public service carries over to its station group as well; the Company's television stations have received numerous awards for excellence in journalism and public affairs programming. Collectively, Belo's television stations have received seven George Foster Peabody awards, five duPont-Columbia awards, and three Edward R. Murrow awards. Just as the Pulitzer Prize is the most prestigious award in print journalism, these are considered by many to be the highest honors in the field of broadcast journalism.

In early 1997 Belo opened its Capital Bureau in Washington, D.C., which houses Washington-based journalists representing the Company's seventeen network-affiliated television stations as well as The Dallas Morning News and the Providence Journal-Bulletin.

Similarly, in May of this year, the Company announced its plans to launch in January 1999 its fourth cable news venture, the Texas Cable News Network ("TXCN"), which will serve the State of Texas. The innovative cable news service will have its own news-gathering capacities as well as the ability to draw from the resources of Belo's three network-affiliated stations in Dallas-Fort Worth, Houston, and San Antonio and the Company's Texas newspaper publications.

## III. AS THE COMMISSION HAS REPEATEDLY RECOGNIZED AND AS ILLUSTRATED BY BELO'S EXPERIENCES, THE SYNERGIES AND ECONOMIES OF SCALE INHERENT IN GROUP OWNERSHIP OF MEDIA OUTLETS LEAD TO SUBSTANTIAL PUBLIC INTEREST BENEFITS

In 1975, the Commission adopted regulations prohibiting the future grant of an AM, FM, or television broadcast station to any party "who directly or indirectly owns, operates or controls" a daily newspaper in the same community.[5] As discussed in greater detail in NAA's comments submitted this day, to justify this cross-ownership ban, the FCC relied solely on what the agency itself described as a "mere hoped for gain in diversity."[6] Moreover, in the same Order in which it adopted the cross-ownership ban, the Commission lauded the "traditions of service" that newspaper publishers had established and maintained in the broadcast industry, concluding both that newspaper-owned stations typically offered superior

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[5] 47 C.F.R. § 3555(d) (1996).

[6] Amendment of Sections 73.34, 73.240, and 73.636 of the Commission's Rules Relating to Multiple Ownership of Standard, FM, and Television Broadcast Stations, 50 FCC 2d 1046, 1078 (1975) (Second Report and Order) ("1975 Multiple Ownership Report"), recon., 53 FCC 2d 589 (1975), rev'd in part sub. nom, National Citizens Comm. for Broadcasting v. FCC, 555 F.2d 938 (D.C. Cir. 1977), reinstated FCC v. Nat'l Citizens Comm. for Broadcasting, 436 U.S. 775 (1978).

programming services and that there was significant "separate operation" of jointly owned newspapers and television stations.[7]

In stark contrast to its hesitant and admittedly predictive conclusion that this restriction on cross-ownership would somehow serve the public interest in diversity, the Commission has repeatedly recognized the public interest benefits inherent in common ownership of mass media outlets in numerous other proceedings addressing media ownership issues in the two decades since its adoption of the newspaper/broadcast ban. For example, in its Order relaxing the one-to-a-market rule, the FCC acknowledged that common ownership of broadcast stations can actually increase the availability of informational programming: "a broadcaster who seeks to operate a second station in the market may, because of economies of scale and cost savings inherent in radio-television combinations in the same market, produce or purchase more informational programming than would two separate stations."[8]

Further, the FCC has observed that even "where one party owned all the stations in a market, its strategy would likely be to put on a sufficiently varied programming menu in each time slot to appeal to all substantial interests."[9] Thus, while individual owners tend to compete

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[7] Id. at 1078, 1089. See also NAA Comments at § IV.

[8] Amendment of Section 73.3555 of the Commission's Rules, the Broadcast Multiple Ownership Rules, 4 FCC Rcd 1741, 1744 (1989) (Second Report and Order), recon. granted in part and denied in part, 4 FCC Rcd 6489 (1989).

[9] Review of the Commission's Regulations Governing Television Broadcasting, 10 FCC Rcd 3524, 3546 (1995) (Further Notice of Proposed Rulemaking). See also Revision of Radio Rules and Policies, 7 FCC Rcd 2755, 2771-72 (1992) (Report and Order) ("In addition, commentators tend to agree with the Notice that greater combination will not harm diversity because, while competing stations might try to reach the same core audience, a single owner might try to program different stations to appeal to different audience segments in order to maximize its total audience size.").

for the same, most lucrative segment of a market, a common owner of multiple media sources in a particular market will often have a greater incentive to diversify its offerings in order to attract the greatest possible market share. Likewise, in a 1992 decision granting a waiver of its one-to-a-market rule, the Commission observed that the efficiencies derived from common ownership of same service radio stations in local markets were "presumptively beneficial and would strengthen the competitive standing of the combined stations, a circumstance that would enhance the quality of viewpoint diversity by enabling such stations to invest additional resources in programming and other service benefits provided to the public."[10] In other words, cross-owners can provide communities with a larger and more diverse range of programs, stories, and viewpoints than could separately owned stations.[11]

The Commission's observations regarding the beneficial synergies and economies of scale stemming from group ownership of media outlets are corroborated by the high level of news and informational programming, as well as the exceptional and innovative services, provided by Belo's newspapers, broadcast stations, and other media ventures. As noted briefly above, Belo has become one of the nation's largest media companies, with seventeen network-affiliated full-service television stations and daily newspaper publications in six markets, and has been honored with numerous awards recognizing its journalistic excellence. Moreover, the Company's television stations are highly committed to providing news and other types of non-

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[10] Golden West Broadcasters, 10 FCC Rcd 2081, 2084 (1995).

[11] See Revision of Radio Rules and Policies, 7 FCC Rcd 6387, 6389 (1992) (Memorandum Opinion and Order and Further Notice of Proposed Rulemaking) ("1992 Revision of Radio Rules and Policies") ("[T]he Commission concluded that relaxation of the national caps may actually enhance the quality of viewpoint diversity, as economies of scale from group ownership provide additional resources to invest in programming.").

entertainment programming. Indeed, as Belo's CEO Robert Decherd explained in a recent presentation to the Advisory Committee on Public Interest Obligations of Digital Television Broadcasting, the Company has consistently "invest[ed] the resources necessary to provide quality local news, public affairs, and community-oriented coverage, and, very importantly, to develop [its] properties into durable news and information franchises, which will be extremely important in the increasingly competitive broadcast environment."

In fact, a programming study recently undertaken by Belo revealed that for fourteen of Belo's seventeen full-service television stations, the amount of news and other informational programming broadcast on a weekly basis significantly exceeds the average amount of such programming aired by all of the other network affiliates in the market.[12] Thirteen of Belo's stations broadcast over sixty hours per week of non-entertainment programming, consisting of newscasts, news/information programming (e.g., news "magazines" and morning news programs), public affairs programs, instructional shows, children's/educational programming, and religious programs.[13] With respect to newscasts alone, moreover, the majority of the Company's television stations air over forty hours per week.[14]

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[12] See Non-Entertainment Programming Study (A.H. Belo Corporation) 1998 (copy attached as Appendix A).

[13] Id.

[14] Id. Belo's programming study confirms, moreover, that many of its television competitors also are highly committed to providing local news and other types of informational programming. In fourteen of the markets in which Belo owns television stations, for example, the network affiliates jointly air over 200 hours of non-entertainment programming per week. The network affiliates in the Dallas-Fort Worth market provide over 280 hours of non-entertainment programming. Id. Thus, these stations alone contribute a very substantial amount of high quality and diverse programming to the information "mix" in their respective markets.

Belo's commitment to journalism and local news coverage is further illustrated by its production of "It's Your Time," a television series in which the Belo station in each of the Company's television markets affords candidates for federal and state office time at no cost to make unedited five-minute statements on their candidacies. The series, begun in 1996, is produced in conjunction with local PBS affiliates and features the views of candidates for the United States Senate, House of Representatives, and Governor in each area served by a Belo station. In addition to making the hour-long program combining the candidates' statements available to both the Belo station and the local PBS station, Belo offers the programs to local cable operators and radio stations as a public service. Each program is aired without commercial interruption. In connection with the 1997-1998 election cycle, moreover, Belo revamped "It's Your Time" to include separate one-minute candidate statements, in addition to the longer (now four-minute) statements incorporated into the hour-long program.

In addition, through its capacity to coordinate its broad range of media resources and services, Belo has been able to create such important newsgathering facilities and information outlets as its four cable news ventures and its news bureau in Washington, DC. As noted above, in May of this year, the Company announced plans to launch TXCN, a statewide cable news channel expected to serve one million cable customers, 24 hours a day beginning on January 1, 1999.[15] In addition to providing statewide news and information, TXCN will have the flexibility of offering local programming in Dallas, Houston, and San Antonio.[16] Although

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[15] Monica Hogan, Belo Signs TCI, Marcus for Texas News Net, Multichannel News, Weekly Edition, June 1, 1998, at 4; Belo Announces Texas Cable News Channel, (visited May 29, 1998) <http://wfaa.com/news/9805/28/txcn.shtml>

[16] Belo Announces Plans to Launch Texas Cable News (News Release of A.H. Belo
(Continued...)

TXCN will have its own news-gathering sources, it will also have the capacity to draw on the resources of WFAA-TV, the Company's Dallas television station, as well as its sister stations in Houston (KHOU-TV) and San Antonio (KENS-TV). In addition, the cable news channel will have access to the resources of Belo's Texas dailies.[17]

TXCN is the Company's fourth cable-news venture. Belo also currently provides NorthWest Cable News in a three state region in the Pacific Northwest. In creating original newscasts and other informational programming, NorthWest Cable News is able to use the resources of four Company television stations: KING-TV (Seattle-Tacoma, Washington); KREM-TV (Spokane, Washington); KGW-TV (Portland, Oregon); and KTVB-TV (Boise, Idaho). In addition, the Company is involved in two cable-news joint ventures: NewsWatch/Channel 15 in New Orleans and Local News on Cable (LNC) in the Norfolk, Virginia market.[18]

Belo similarly has been able to utilize its varied journalistic resources to provide better service through the creation of its Capital Bureau in Washington, D.C. Opened in April of 1997, the news bureau expanded and combined all of the Company's operations in Washington, which previously included the separate offices of three Belo television stations as well as the Washington bureau of The Dallas Morning News.[19] The Capital Bureau also

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Corporation), May 28, 1998.

[17] Id.

[18] Monica Hogan, Belo Signs TCI, Marcus for Texas News Net, Multichannel News, Weekly Edition, June 1, 1998, at 4.

[19] Belo Announces Opening of Capital Bureau (News Release of A.H. Belo Corporation), April
(Continued...)

incorporates both the broadcasting and the newspaper facilities previously maintained in D.C. by the Providence Journal Company.[20] Housing approximately thirty staff members, the bureau's facilities include a complete television studio as well as up-to-date electronic and communications equipment.

In addition to providing separate news reports for Belo's television stations and newspaper publications, the D.C. bureau develops joint programming, utilizing both broadcasting and newspaper personnel, that in all likelihood would not be possible for separate owners. For example, the bureau produces "Capital Conversation," a half-hour weekly public affairs television program addressing issues faced by the Texas Congressional delegation and featuring both television and newspaper correspondents.[21] Thus, like its four cable news ventures, Belo's news bureau in the national capital represents an ambitious effort to combine the strengths of the Company's diversified broadcasting and publishing businesses to provide improved and additional information services.

In sum, as the Commission has explicitly recognized and as the experiences of the Belo group clearly demonstrate, permitting common ownership of media outlets can serve to further the Commission's goal of increasing the quantity and improving the quality of news, public affairs, and local programming on television broadcast stations. In addition, joint ownership affords the opportunity to take advantage of a publisher's and broadcaster's varied resources to

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(...Continued)
18, 1997.

[20] Id.

[21] Id.

develop new and innovative services that complement and expand the offerings of the "traditional" broadcast and print media. Maintenance of the Commission's rule prohibiting newspaper/broadcast cross-ownership, however, prevents the full realization of the benefits that might be obtained through joint ownership and operation.

## IV. JOINTLY-OWNED NEWSPAPERS AND TELEVISION STATIONS HAVE PROVIDED EXCEPTIONAL JOURNALISTIC SERVICE AND HAVE EVERY INCENTIVE TO OPERATE INDEPENDENTLY, AS DEMONSTRATED BY BELO'S CROSS-OWNERSHIP IN THE DALLAS MARKET

Since 1950, when Belo first entered the broadcast market through the acquisition of WFAA-TV in Dallas-Fort Worth, the Company has continuously owned and operated both a daily newspaper and a broadcast television station within the Dallas market. When Belo purchased WFAA-TV, it had already been publishing The Dallas Morning News for over sixty years. Pursuant to the Commission's 1975 Order adopting the newspaper/broadcast cross-ownership prohibition, this combination was not one of the sixteen "egregious cases" targeted for divestiture and was, therefore, grandfathered by the agency.[22] Belo submits that the superior service provided by both WFAA-TV and The Dallas Morning News -- as well as the history of separate operation of and the independent editorial judgment exercised by the two entities -- illustrate that there is no legitimate public interest rationale for continuing to single out newspaper publishers and broadcast station licensees under the anachronistic cross-ownership restriction.

[22] 1975 Multiple Ownership Report, 50 FCC 2d at 1049.

### A. The Commission Recognized in 1975 That Broadcast Stations Operated in Combination with Daily Newspapers Generally Provide Superior Service and Maintain Separate Operations

Prior to the adoption of the newspaper/broadcast station cross-ownership prohibition, the FCC historically had encouraged the participation of newspaper publishers in the broadcasting industry. Indeed, publishers such as Belo pioneered first AM service and, subsequently, FM and television service in many communities.[23] Even in its 1975 decision adopting the cross-ownership restriction, the Commission praised the "pioneering spirit" of these cross-owners, noting that newspaper publishers established "[t]raditions of service" in the broadcasting industry that "have been continued."[24] In this same Order, the Commission also recognized that "many [newspaper publishers] began operation [of broadcast facilities] long before there was hope of profit" and that "were it not for their efforts service would have been much delayed in many areas."[25]

In addition to recognizing the "pioneering spirit" and dedication that newspaper publishers brought to the broadcasting industry, the Commission also concluded in its 1975 Order that stations owned by publishers of daily newspapers typically offered superior programming services. Specifically, based upon an examination of programming reports filed by broadcast licensees, the FCC found that, on average, co-located newspaper-owned stations programmed six percent more local news, nine percent more non-entertainment programming,

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[23] Id. at 1074.

[24] Id. at 1074, 1078.

[25] Id. at 1078.

and twelve percent more local programming than other television stations.[26] Based on these findings, the Commission concluded that there was "an undramatic but nonetheless statistically significant superiority in newspaper owned television stations in a number of program particulars."[27]

In addition, in determining that only a few "egregious cases" would be subject to divestiture under its newly-adopted newspaper/broadcast cross-ownership restriction, the FCC found that there was in general significant diversity or "separate operation" between jointly-owned newspapers and television stations.[28] A number of cross-owners that were parties to the 1975 proceedings explained to the Commission that their newspaper and broadcast operations employed separate editorial and reportorial staffs as well as distinct sales staffs.[29] In response, the Commission both endorsed the practices of these cross-owners and noted that such separation was an "important point" in its consideration of the cross-ownership issue.[30] Indeed, based on its observations regarding both the traditions of service that newspaper publishers had brought to the broadcasting industry and the separate operation of many jointly-owned newspapers and television stations, it is not surprising that the Commission concluded that "there is no basis in fact or law for finding newspaper owners unqualified as a group for

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[26] Id. at 1094-1098 (app. C).

[27] Id. at 1078 n.26.

[28] Id. at 1089.

[29] Id. at 1089.

[30] Id.

future broadcast ownership" and narrowly limited the scope of forced divestiture.[31] Belo submits that the Commission's findings with respect to the level of service by and the degree of independence of newspaper-owned broadcast properties have been borne out in the continued operations of Belo and other grandfathered owners and are to be fully expected of new broadcast/newspaper combinations that may come into existence when the outdated prohibition is lifted.

### B. WFAA-TV and The Dallas Morning News Have Offered Outstanding Service to the Dallas Market

The observations by the Commission in 1975 regarding the superior service offered by broadcast stations jointly owned with daily newspapers -- ironically made simultaneously with the adoption of rules that had the effect of short-circuiting such public interest benefits -- certainly find confirmation in Belo's cross-ownership experience in the Dallas-Fort Worth market. As noted above, the success of The Dallas Morning News is built largely upon its commitment to offering local news, information, and community service of the highest caliber. The Dallas Morning News has been honored with six Pulitzer Prizes since 1986. For example, the newspaper was awarded the 1986 Pulitzer Prize for Investigative Reporting for its series, "Separate and Unequal," which helped to effectuate significant national policy changes in federally funded housing. In addition, in 1989 the publication was awarded the Pulitzer Prize for Explanatory Journalism for "Anatomy of an Aircrash" and the Pulitzer Prize for Feature Photography for its series on "Romania's Forgotten Children."

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[31] Id. at 1075.

Similarly, and again because of Belo's journalistic tradition and its commitment to news and informational programming, WFAA-TV has become an established leader among broadcasters in the Dallas-Fort Worth market. WFAA-TV currently provides the highest amount of news and other non-entertainment programming of any of the network-affiliated stations in its market.[32] Thus, the station currently airs, on average, 47 hours of local and national newscasts, 25.5 hours of news/information programs (e.g., news "magazines" and morning news programs), and a total of 81.5 hours of non-entertainment programming each week.[33] Moreover, like Belo's other television stations, and as described in more detail above, WFAA-TV produces and airs "It's Your Time," a commercial-free television series providing free time for statements by candidates for public office.

WFAA-TV has been ranked as the number one station in its market for the past fifteen years, and the station's reputation for superior journalism has been recognized through numerous awards, including five duPont-Columbia awards and a George Foster Peabody award. In 1995, WFAA-TV's 10 o'clock news was the highest-rated late newscast of any top-ten market station based on an average of the four Nielsen rating periods.[34] In the fall of 1994, moreover, WFAA-TV launched "Good Morning Texas," a live morning program consisting of

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[32] See Non-Entertainment Programming Study (A.H. Belo Corporation) 1998. As noted above, non-entertainment programming consists of newscasts, news/information programs, public affairs shows, instructional programs, children's/educational programming, and religious programs.

[33] Id. In addition to the 44.5 hours of newscasts recorded in the Non-Entertainment Programming Study, WFAA-TV has recently begun broadcasting another half-hour week-day newscast.

[34] Dallas-Fort Worth is currently ranked as the 8th largest television market in the United States. Television & Cable Factbook, A-1 (1998).

information, talk, and entertainment specifically aimed at its Texas audience. "Good Morning Texas" has been a consistent ratings winner since its premiere. Thus, the consistent records of outstanding service -- and audience acceptance -- that have been provided by WFAA-TV and The Dallas Morning News confirm the findings of the study noted by the Commission in 1975 that cross-owners typically provide superior programming service, refuting arguments that prohibiting such cross-ownership somehow serves the public interest.

### C. WFAA-TV and The Dallas Morning News Have Consistently Maintained Separate Operations with Distinct Editorial Voices and Have Every Incentive to Continue to Do So

During the Commission's 1975 proceedings, a number of parties who jointly-owned a daily newspaper and a broadcast television station within the same market offered the Commission detailed explanations of their strong incentives to maintain significant diversity or separation of operation between their media outlets.[35] Most of the parties to the proceeding "state[d] that their broadcast stations and newspapers ha[d] separate management, facilities, and staff, including news and advertising staffs (which compete with each other for advertising)...."[36] Some of these owners even provided the Commission with examples in which, as a result of their independent editorial operations, they presented editorials in one media outlet which were opposed through the other outlet.[37] These rationales continue to hold true today. Thus, because cross-owners such as Belo would -- without governmental

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[35] 1975 Multiple Ownership Report, 50 FCC 2d at 1059-60.

[36] Id. at 1059.

[37] Id.

intervention -- be motivated by journalistic principles and marketplace forces to maintain independent and competitive operations, Belo submits that the newspaper/broadcast cross-ownership rule has done little if anything to advance the "hoped for gain in diversity" that was the underpinning of the Commission's decision to adopt the rule in the first place.[38]

First, as was pointed out by parties to the 1975 proceedings, strong traditions of journalistic professionalism and the development of industry practices and codes of ethics have resulted in highly independent staffs operating even commonly owned media outlets.[39] Indeed, a primary tenet of any well-respected journalistic organization -- including Belo -- is that reporters must be afforded wide discretion and independent judgment in the presentation of news stories. Thus, any effort to stifle journalistic independence in order to unify the editorial voices of commonly owned media entities certainly would not be tolerated by professional print or broadcast journalists.

Commonly-owned newspapers and broadcast stations also generally have very divergent methods of organizing and presenting news and information. Because television news tends to be very concise and headline-focused, while newspapers typically expand on details and offer more comprehensive coverage of stories, there is generally little economic or practical incentive to merge these two distinctive types of presentation. In addition, business incentives serve to discourage newspaper publications and broadcast stations within the same market from integrating their operations. Publishing and broadcasting are fundamentally different businesses, and local newspapers and television stations each must compete intensely

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[38] Id. at 1078.

[39] Id. at 1060.

in their own spheres for audiences and to build advertiser patronage. Thus, economic forces further drive newspapers and broadcast stations to maintain separate editorial voices. The efficacy of these journalistic traditions and economic incentives is well-illustrated by the highly independent editorial operations of WFAA-TV and The Dallas Morning News. Although the two entities share resources such as the above-described news bureaus, they operate as separate businesses, and there is no ongoing editorial coordination between the newspaper and the television station.

## V. BECAUSE THEIR COMPETITORS ARE FREE TO TAKE ADVANTAGE OF THE OPERATIONAL SYNERGIES AND ECONOMIES OFFERED BY CROSS-MEDIA RELATIONS, THE NEWSPAPER/BROADCAST CROSS-OWNERSHIP RULE UNFAIRLY SINGLES OUT NEWSPAPER PUBLISHERS AND BROADCAST STATION LICENSEES

Notwithstanding the recognized benefits of common ownership, newspapers and television broadcast stations within the same market continue to be precluded from realizing the synergies and public interest benefits associated with cross-ownership. When the newspaper/broadcast cross-ownership ban was adopted in 1975, however, the restriction was merely one of several similar rules preventing common ownership of more than one type of media outlet in the same market.[40] Today's media marketplace is vastly different from what existed in 1975. Indeed, the changing media marketplace has caused both Congress and the FCC to re-evaluate the validity of many of the rules that existed at that time, resulting in a

[40] See FCC v. Nat'l Citizens Comm. for Broadcasting, 436 U.S. 775, 801 (1978). In fact, in upholding the newspaper/broadcast cross-ownership ban, the Supreme Court noted that "owners of radio stations, television stations, and newspapers alike are now restricted in their ability to acquire licenses for co-located broadcast stations." Id.

substantial decrease in the number of ownership regulations that remain in full force.[41] This has left newspaper owners and broadcast licensees virtually alone in being absolutely barred from cross-ownership.

Recognizing the declining validity of the Commission's cross-ownership restrictions in today's vastly diverse media marketplace, Congress called for the most sweeping overhaul of those restrictions to date with the passage of the Telecommunications Act of 1996. In enacting the 1996 Act, Congress sent a clear message that "[i]n a competitive environment, arbitrary limitations on broadcast ownership and blanket prohibitions on mergers or joint ventures between distribution outlets are no longer necessary."[42] In addition, Congress expressly mandated in the 1996 Act that the FCC eliminate, relax, or review many of its ownership restrictions, directing a detailed re-examination of the validity of such rules in light of the changed media marketplace.

For example, the Act required the Commission to repeal the cable-telephone cross-ownership ban, which, like the newspaper/broadcast cross-ownership ban, was an absolute bar to joint ownership.[43] The Act also mandated relaxation of the radio and television multiple ownership rules,[44] elimination of the broadcast/cable cross-ownership ban,[45] and extension of

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[41] See NAA Comments at § VII(C).

[42] H. R. Conf. Rep. No. 104-204, pt. 1, at 55 (1995).

[43] Telecommunications Act of 1996, Pub. L. No. 104-104, § 202(i), 110 Stat. 56, 112 (1996).

[44] See Telecommunications Act of 1996, §§ 202(a)-(c), 110 Stat. at 110-11; Broadcast Radio Ownership, 11 FCC Rcd 12368 (1996) (Order) (eliminating numerical limitations on national radio ownership); National Broadcast Television Ownership and Dual Network Operations, 11 FCC Rcd 12374 (1996) (Order) (eliminating numerical restriction on national television ownership and raising audience reach limit to 35 percent).

the one-to-a-market waiver policy to the top fifty markets.[46] In directing the FCC to eliminate or relax many and undertake a searching reconsideration of all of its mass media ownership restrictions, Congress explicitly recognized that a tremendous level of competition and diversity exists in the marketplace and that these outdated restrictions are no longer necessary.[47]

Even before the agency was prodded to relax or eliminate its ownership restrictions by the Telecommunications Act of 1996, the Commission itself had recognized in numerous agency proceedings that rigid restrictions on multiple ownership of media outlets are no longer necessary, given the tremendous increase in the number of media outlets available to the public. In its 1992 decision to relax its radio multiple ownership rules, for example, the Commission noted that "the intense inter- and intra-industry competition has produced an extremely fragmented [media] marketplace in which existing and future . . . broadcasters will be subject to increasingly severe economic and financial stress."[48] Similarly, in relaxing its waiver policy associated with the one-to-a-market rule, the FCC found in 1989 that

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[45] Telecommunications Act of 1996, § 202(f)(1), 110 Stat. at 111.

[46] Telecommunications Act of 1996, § 202(a), 110 Stat. at 110.

[47] See H. R. Conf. Rep. 104-204, pt. 1, at 54-55 ("The audio and video marketplace . . . has undergone significant changes over the past fifty years and the scarcity rationale for government regulation no longer applies. . . . There is also competition from cable systems as suppliers of video programming. . . . [and] other technologies such as wireless cable, low power television, backyard dishes, satellite master antenna television service (SMATV) and video cassette recorders (VCRs) provide consumers with additional program distribution outlets.").

[48] 1992 Revision of Radio Rules and Policies, 7 FCC Rcd at 6387.

"circumstances have changed substantially in the eighteen years since [the rule was adopted]" and that its "diversity concerns have become somewhat attenuated since [that time]."[49] The Commission correctly found that "there has been a dramatic increase in the number of media outlets in markets of all sizes, which has enhanced both viewpoint and programming diversity on a local level. In large markets, the degree of diversity is tremendous."[50]

The combined Congressional and FCC initiatives to relax media ownership restrictions have left newspapers and broadcast station licensees alone among major media sources facing a "per se" ban on cross-ownership. Indeed, unlike cable and programmers, DBS, SMATV, and wireless cable service providers, local and long distance telephone companies, on-line services (e.g., America On Line, Prodigy), software providers (e.g. Microsoft), magazine publishers, and direct mailers, only newspaper publishers are barred entirely from owning local broadcast stations. Moreover, numerous other types of media combinations are entirely permissible, including the following:

- cable/radio
- cable "clustering" (ownership of multiple systems in adjacent areas)
- wireless cable/broadcast
- wireless cable/telco
- on-line services (America On Line, Prodigy)/cable
- on-line services/telco

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[49] Amendment of Section 73.3555 of the Commission's Rules, the Broadcast Multiple Ownership Rules, 4 FCC Rcd at 1744.

[50] Id.

- on-line services/broadcast
- software providers (Microsoft)/cable
- software providers/telco
- software providers/broadcast
- software providers/newspaper
- telco/newspaper
- telco/broadcast
- telco/DBS
- DBS/broadcast

While all of the above entities have an unrestricted right to form co-located cross-ownerships, the Commission has been entirely inflexible in banning the cross-ownership of newspapers and broadcast stations. Indeed, the agency has granted only three permanent waivers of the rule in the more than twenty years since its adoption -- all in extremely unusual circumstances, under an antiquated standard originally adopted in connection with the requirement for divestiture by sixteen "egregious" cross-owned combinations.[51] The rule has been rigidly applied without regard to the specifics of the properties involved or the circumstances of the local marketplace.[52]

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[51] Field Communications Corporation, 65 FCC 2d 959 (1977); Fox Television Stations, Inc., 8 FCC Rcd 5341 (1993), aff'd sub nom. Metropolitan Council of NAACP Branches v. FCC, 46 F.3d 1154 (D.C. Cir. 1995); Columbia Montour Broadcasting Co., FCC 98-114 (rel. June 11,1998).

[52] For example, in Capital Cities/ABC, Inc., the Commission denied the request of the Walt Disney Company ("Disney") for permanent waivers for newspaper/radio combinations in the Dallas-Fort Worth and Pontiac-Detroit markets. 11 FCC Rcd 5841, 5895 (1996).

(Continued...)

Thus, despite their acknowledged qualifications, newspaper publishers are precluded from seeking to acquire same-market broadcast properties, and station owners are eliminated as potential newspaper publishers. Belo's publication of The Press Enterprise, a daily newspaper serving Riverside County and the inland Southern California area, provides an illustrative case in point.[53] Combining the resources of that newspaper with those of a local television station could enable both to provide a higher level of service to Riverside and, perhaps, to compete more vigorously in the greater Los Angeles market. Because virtually all of the television stations in the Los Angeles market produce Grade A contours that encompass Riverside,[54] however, the current letter of the rule effectively prohibits Belo from acquiring any of the stations within this expansive market. Indeed, Belo is barred from acquiring a broadcast station in any of its other newspaper markets, or a daily newspaper in any of the sixteen

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(...Continued)
Notwithstanding Disney's detailed showing of the high levels of diversity and competition in these markets and the recognition of the need for a "full review" of the rule, the Commission granted Disney only a temporary waiver. Id. at 5881, 5888. Just five months later, the FCC denied a similar waiver request by Tribune Company ("Tribune"). Stockholders of Renaissance Communications Corp., 12 FCC Rcd 11866 (1997). Tribune, which publishes the Fort Lauderdale, Florida Sun Sentinel, sought a permanent waiver to permit the acquisition of WDZL(TV), a UHF television station licensed to Miami. The agency rejected Tribune's request, "despite the existence of a number of competing media voices in the South Florida market" and Tribune's specific proposals to augment the news and information programming of the television station involved, concluding once again that "an open proceeding, rather than a restricted adjudication is the better forum to address [the] issues [raised in support of the waiver]." Id. at 11886, 11888.

[53] The circulation of The Press Enterprise of 162,551 for morning editions and 170,478 for Sunday editions is modest in comparison to that of market's largest daily newspaper, the Los Angeles Times, which currently boasts a morning circulation of 1,050,176 and a Sunday circulation of 1,361,748. Editor & Publisher International Yearbook at I-36, I-45 (1998).

[54] Television & Cable Factbook, A-128 to A-143 (1998).

markets (other than Dallas) in which it owns a television station. Moreover, even in the event that it might be able to persuade the Commission to grant a waiver of the cross-ownership rule, the Company's opportunity to purchase a broadcast station -- or to acquire a newspaper in one of its existing stations' markets -- would in all likelihood be barred by the typical seller's reluctance to deal with a party who must confront the obstacles imposed by the cross-ownership ban.

Newspaper owners and broadcasters are placed at a marked disadvantage in their ability to compete in the diverse and ever-expanding multimedia market of the late 1990s because of their inability to operate under joint ownership and take appropriate advantage of the recognized benefits from economies of scale.[55] The restriction also disserves the public: Belo submits that the increase in available resources from the economic efficiencies associated with common ownership can and would result in increased public interest programming and greater diversity. Indeed, both the agency and Congress have recognized that cross-ownership between other categories of media owners benefits both competition and diversity. As demonstrated herein, there is no legitimate public interest rationale for perpetuating this discriminatory treatment of newspapers and broadcasters.

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[55] Although separately owned newspapers and broadcasters are entitled to combine their resources through certain joint venture agreements, joint ventures have a limited ability to achieve efficient joint production because of the difficulties and costs involved in agreeing on the scope and nature of operations and the differing incentives of independently owned partners with different "core" businesses.

## VI. AN ANALYSIS OF THE DALLAS MEDIA MARKETPLACE DEMONSTRATES THAT THERE IS NO LEGITIMATE REASON TO BELIEVE THAT OPENING MARKETS TO THE CROSS-OWNERSHIP OF NEWSPAPERS AND BROADCAST STATIONS WILL HAVE A NEGATIVE IMPACT ON COMPETITION

As the NAA has amply demonstrated both in its Petition for Rulemaking and in the comments the organization is submitting today in the instant proceeding, the mass media marketplace has undergone a dramatic transformation since the newspaper/broadcast cross-ownership rule was first implemented in 1975.[56] Over the past two decades, the traditional forms of mass media outlets -- newspaper publishing and radio and television broadcasting -- have grown at an exponential rate, both in terms of the sheer number of voices available and in the accessibility of a rich variety of programming formats. Cable has grown from a "community antenna" service to the dominant vehicle for delivery of video programming.

There have also been an extraordinary number of new media entrants in recent years, including videocassettes, direct broadcast satellite service, wireless cable, SMATV, DARS, and the Internet. Not only are these new media significant alternative outlets for the dissemination of information, but they also have evolved into legitimate competitors to the longer-established media in the contest for audience members and subscribers as well as the scramble for advertising dollars -- erasing any realistic prospect that a newspaper/broadcast combination could adversely impact diversity or competition in the local marketplace.

Whatever merit the cross-ownership ban may have had in 1975, it can no longer be seriously questioned that the exponential increase in the level of diversity and competition in

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[56] See NAA Petition at § V; NAA Comments at § VI.

the information marketplace has wholly eroded the FCC's original justification for the policy. Indeed, in numerous proceedings since the implementation of the newspaper ban, the Commission itself has repeatedly acknowledged the vast expansion in the media marketplace, as well as the positive impact of that expansion on diversity.[57]

That the combined ownership of a daily newspaper and a television station within a local market can hardly impede the explosion of diversity that has occurred in the information marketplace is amply demonstrated by Belo's experience in the highly competitive Dallas-Fort Worth market. Despite the continuous common ownership of The Dallas Morning News and WFAA-TV, the Dallas-Fort Worth market remains robustly diverse and competitive.

In 1996, in Capital Cities/ABC, Inc., the Walt Disney Company ("Disney") documented the impressive diversity of media voices in this market.[58] In that case, the Commission denied Disney's request for a permanent waiver to permit retention of a newspaper/radio combination, instead granting the company only a temporary waiver and vowing to conduct a "full review" of the rule in a separate proceeding.[59] In connection with its waiver request, Disney compiled and presented detailed data regarding the high levels of

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[57] For example, as early as 1984, the Commission recognized that for purposes of mass media diversity the market includes "not simply television and radio, but also cable, video cassette recorders, newspapers, magazines, books, and when they are in operation, MDS, STV, LPTV, and DBS." Amendment of Section 73.3555 of the Commission's Rules Relating to Multiple Ownership of AM, FM and Television Broadcast Stations, 100 FCC 2d 17, 30 (1984) (Report and Order). Several years later, the Commission concluded that the fairness doctrine infringed on the First Amendment right of television broadcasters in light of the "explosive growth in the number and types of information sources available in the marketplace." Syracuse Peace Council v. WTVH, 2 FCC Rcd 5043 (1987).

[58] Capital Cities/ABC, Inc., 11 FCC Rcd 5841, 5881 (1996).

[59] Id. at 5888, 5895.

competition among media outlets in the Dallas-Fort Worth area. Petitioners showed, for example, that there were a total of 87 broadcast stations in the Dallas-Fort Worth area, 69 of which were separately owned.[60] In addition, Disney demonstrated that the area was served by nineteen daily newspapers as well as numerous national magazines and weekly newspapers.[61] It was further shown that the cable penetration rate was 49.1% and that the market was served by a number of wireless cable (MDS/MMDS) operators.[62] In response to these showings, Commissioner Quello in a separate statement identified the Dallas-Fort Worth market as "among most diverse in the country."[63]

The Dallas-Fort Worth market has only become more diverse and competitive since Disney made these showings in 1996. While newspapers now account for less than one third of the Dallas market's advertising revenue, there are currently over fifty publications competing for that share of the market.[64] Among these newspapers are a number of national publications, such as The Dallas Business Journal, which have begun to target the Dallas market's national advertising revenue by offering the opportunity to advertise simultaneously in a number of "sister publications" in other markets. Moreover, the cable penetration rate in

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[60] Id. at 5881.

[61] Id. at 5912 (separate statement of Commissioner Quello).

[62] Id. at 5881.

[63] Id. at 5912 (separate statement of Commissioner Quello).

[64] See 1998 Ad Audit Report for the Dallas PMSA (1998); Dun & Bradstreet MarketPlace, July-September, 1998. Figures are based on the Dallas Primary Metropolitan Statistical Area ("PMSA"), which consists of eight counties (Collin, Dallas, Denton, Ellis, Henderson, Hunt, Kaufman, and Rockwall).

the Dallas-Fort Worth market has risen to 52 percent.[65] In addition to these more traditional types of media, the market now offers 32 web outlets. Over 250 direct mail advertising and outdoor advertising services also compete for the market's advertising dollars.[66]

In short, despite Belo's ownership of a leading daily newspaper and a strong commercial television station in the Dallas market, the market is unquestionably served by an abundance of mass media competitors. Belo's experience as a grandfathered cross-owner thus confirms that elimination of the newspaper/broadcast ban would not inhibit the explosive growth of diversity that has characterized the mass media marketplace since the Commission's adoption of the newspaper/broadcast cross-ownership rule in 1975. On the contrary, as demonstrated above, repeal of this anachronistic prohibition would free Belo and others to bring the benefits of their experience and resources to bear to provide improved broadcast news and informational services and to develop innovative new services and alternative media products to add to the already extensive diversity of the marketplace.

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[65] Broadcasting & Cable Yearbook, C-3 (1998).

[66] Dun & Bradstreet Marketplace, July-September, 1998.

## VII. CONCLUSION

For the reasons set forth above, Belo urges the Commission to initiate a rulemaking proceeding to repeal the newspaper/broadcast cross-ownership ban in its entirety. The rule is an anachronistic relic of an outdated regulatory regime which is plainly unnecessary in the current mass media environment and serves only to handicap publishers and broadcasters in their efforts to compete effectively in the multi-channel marketplace of the late 1990s.

Respectfully submitted,

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July 21, 1998

# APPENDIX A

# Non-Entertainment Programming Study

BELO

*"The FCC could require that a reasonable percentage of digital television – 5% – be set aside for public-interest programming."*

– *Former FCC Chairman Reed E. Hundt*
"The Hard Road Ahead – An Agenda for the FCC in 1997" December 26, 1996

*"Five percent of the programming time for a digital TV license . . . [t]his is a very substantial number."*

–*Former FCC Chairman Reed E. Hundt*
Speech prepared for American University/TCI News Symposium, National Press Club Washington, D.C.
May 23, 1996

# ABOUT THE STUDY

- The following tables are designed to show the amount of time devoted each week to the broadcast of non-entertainment programming by the seventeen full-service television stations owned and operated by Belo and its subsidiaries. The tables also include corresponding combined totals for the ABC, CBS, NBC, and FOX affiliates in each of the Belo markets.[1]

- Program Categories:
  - Newscasts: network and local newscasts (not including the news update segments of other news/information programming).
  - News/Information: news "magazines," morning news programs, and prime time news programs, such as "Good Morning America" and "Dateline NBC." (Tabloids and talk shows, such as "Hard Copy," "Entertainment Tonight" and "Oprah" are not included.)
  - Public Affairs: programs that discuss politics, current events, and other topics of public interest, such as "Meet the Press" and "Capital Conversation."
  - Instructional: how-to-programs such as "Your New House" and "Martha Stewart."
  - Children's/Educational: programs, as identified in program guides, designed to further "the educational and informational needs of children 16 years of age and under in any respect, including the child's intellectual/cognitive or social/emotional needs."
  - Religion: paid religious programs.

- Hours and Percentages:
  - For each day of the week, the tables show the amount, in hours, rounded to the nearest ¼ hour, of each category of programming broadcast during a twenty-four hour period[2] by the Belo station named at the top of the chart. The figures are derived from a representative week and based upon published program guide listings.
  - Weekly Total: total number of hours of each category of programming broadcast during the week specified by the Belo station.
  - Weekly Total as Percentage of Total Programming: percentage of each broadcast week (168 hours) devoted to each category of programming.
  - Weekly Total for All Network Affiliates: total hours of each category of programming broadcast during the week for all four network affiliates (ABC, NBC, CBS and FOX) in the market.
  - Weekly Total for All Network Affiliates as Percentage of Total Programming: percentage of each broadcast week of all four network affiliates (672 hours) devoted to each category of programming.
  - Discounted for Commercials: based upon data from a representative Belo station (KHOU-TV), the average amount of commercial matter in each hour of non-entertainment programming is 14.4 minutes, or 24% of each hour. This average figure is applied to all categories of programming, including children's/educational programming, although Belo stations comply with FCC standards for permissible commercial matter in children's programming. The numbers to the right of the "slash" marks have been discounted by that percentage to subtract commercial matter from the totals.[3]

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[1] The numbers in the tables include network, syndicated, and locally-produced programming.

[2] The programming totals for KHNL-TV, Honolulu, and the other network affiliates in the Honolulu market, cover the period from 7 a.m. to 1 a.m.

[3] Religious programming generally does not contain commercials, and consequently, the totals have not been discounted.

## WFAA-TV, Dallas-Fort Worth, TX

**Channel 8, ABC**

***News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning November 23, 1997***

## Dallas-Fort Worth Network Affiliates

**(ABC, CBS, NBC, FOX)**

| | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | SAT. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
|---|---|---|---|---|---|---|---|---|---|---|---|
| NEWSCASTS | 2.75 | 8 | 7.5 | 8.25 | 8.25 | 7.25 | 2.5 | 44.5 / 33.82 | 26.5% / 20.1% | 170 / 129.2 | 25.3% / 19.2% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 2 | 4.5 | 4.5 | 4.5 | 4.5 | 4.5 | 1 | 25.5 / 19.38 | 15.2% / 11.5% | 79 / 60.04 | 11.8% / 8.9% |
| PUBLIC AFFAIRS | 2 | - | - | - | - | - | .5 | 2.5 / 1.9 | 1.5% / 1.1% | 5 / 3.8 | 0.7% / 0.6% |
| INSTRUCTIONAL (e.g., how-to programs) | 1 | - | - | - | 1 | - | - | 2 / 1.52 | 1.2% / 0.9% | 10.5 / 7.98 | 1.6% / 1.2% |
| CHILDREN'S/ EDUCATIONAL | - | - | - | - | - | - | 4.5 | 4.5 / 3.42 | 2.7% / 2.0% | 14 / 10.64 | 2.1% / 1.6% |
| RELIGION | 2.5 | - | - | - | - | - | - | 2.5 / 2.5 | 1.5% / 1.5% | 4.5 / 4.5 | 0.7% / 0.7% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 10.25 | 12.5 | 12 | 12.75 | 13.75 | 11.75 | 8.5 | 81.5 / 61.94 | 48.5% / 36.9% | 283 / 215.08 | 42.1% / 32.0% |

| KHOU-TV, Houston, TX<br>Channel 11, CBS<br>*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning January 4, 1998* | | | | | | | | | | Houston Network Affiliates<br>(ABC, CBS, NBC, FOX) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | SAT. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
| NEWSCASTS | 1.5 | 6.5 | 7.75 | 7.75 | 7.75 | 7.75 | 4 | 43 / 32.68 | 25.6% / 19.5% | 136.5 / 103.74 | 20.3% / 15.4% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 2.5 | 1 | 1 | 2 | 2 | 1 | 2 | 11.5 / 8.74 | 6.8% / 5.2% | 53 / 40.28 | 7.9% / 6.0% |
| PUBLIC AFFAIRS | 1 | - | - | - | - | - | - | 1 / .76 | 0.6% / 0.5% | 4.5 / 3.42 | 0.7% / 0.5% |
| INSTRUCTIONAL (e.g., how-to programs) | - | .5 | 1 | 1 | 1 | 1 | 2 | 6.5 / 4.94 | 3.9% / 2.9% | 7.5 / 5.7 | 1.1% / 0.8% |
| CHILDREN'S/ EDUCATIONAL | 3 | - | - | - | - | - | 1 | 4 / 3.04 | 2.4% / 1.8% | 15 / 11.4 | 2.2% / 1.7% |
| RELIGION | 1.5 | - | - | - | - | - | - | 1.5 / 1.5 | 0.9% / 0.9% | 3 / 3 | 0.4% / 0.4% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 9.5 | 8 | 9.75 | 10.75 | 10.75 | 9.75 | 9 | 67.5 / 51.3 | 40.2% / 30.5% | 229.5 / 174.42 | 34.2% / 26.0% |

| KING-TV, Seattle-Tacoma, WA<br>Channel 5, NBC<br>*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 6, 1997* | | | | | | | | | | Seattle-Tacoma Network Affiliates<br>(ABC, CBS, NBC, FOX) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | MON. | TUES. | WEDS. | THURS. | FRI. | SAT. | SUN. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
| NEWSCASTS | 8 | 8 | 8 | 8 | 8 | 8.5 | 5 | 53.5 / 40.66 | 31.8% / 24.2% | 147.5 112.1 | 21.9% / 16.7% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 3 | 3 | 2 | 2 | 3 | .5 | 2 | 15.5 / 11.78 | 9.2% / 7.0% | 50 / 38 | 7.4% / 5.7% |
| PUBLIC AFFAIRS | - | - | - | - | - | .5 | 1.5 | 2 / 1.52 | 1.2% / 0.9% | 8.5 / 6.46 | 1.3% / 1.0% |
| INSTRUCTIONAL (e.g., how-to programs) | .5 | .5 | .5 | .5 | .5 | 1 | .5 | 4 / 3.04 | 2.4% / 1.8% | 9.5 / 7.22 | 1.4% / 1.1% |
| CHILDREN'S/ EDUCATIONAL | - | - | - | - | - | 3.5 | .5 | 4 / 3.04 | 2.4% / 1.8% | 19.5 / 14.82 | 2.9% / 2.2% |
| RELIGION | - | - | - | - | - | - | .5 | .5 / .5 | 0.3% / 0.3% | 4.5 / 4.5 | 0.7% / 0.7% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 11.5 | 11.5 | 10.5 | 10.5 | 11.5 | 14 | 10 | 79.5 / 60.42 | 47.3% / 36.0% | 239.5 / 182.02 | 35.6% / 27.1% |

| KXTV, Sacramento, CA<br>Channel 10, ABC<br>*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 6, 1997* | | | | | | | | | | Sacramento Network Affiliates<br>(ABC, CBS, NBC, FOX) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | SAT. | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
| NEWSCASTS | .5 | 2 | 6.5 | 8 | 8 | 8 | 8 | 41 / 31.16 | 24.4% / 18.5% | 122 / 92.72 | 18.2% / 13.8% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 1 | 3.5 | 3.5 | 3.5 | 4.5 | 4.5 | 4 | 24.5 / 18.62 | 14.6% / 11.1% | 70 / 53.2 | 10.4% / 7.9% |
| PUBLIC AFFAIRS | 1 | 1 | - | - | - | - | - | 2 / 1.52 | 1.2% / 0.9% | 2.5 / 1.9 | 0.4% / 0.3% |
| INSTRUCTIONAL (e.g., how-to programs) | - | 1.5 | .5 | .5 | .5 | .5 | .5 | 4 / 3.04 | 2.4% / 1.8% | 4.5 / 3.42 | 0.7% / 0.5% |
| CHILDREN'S/ EDUCATIONAL | 3.5 | 1 | - | - | - | - | - | 4.5 / 3.42 | 2.7% / 2.0% | 18.5 / 14.06 | 2.8% / 2.1% |
| RELIGION | - | - | - | - | - | - | - | - | - | 5.5 / 5.5 | 0.8% / 0.8% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 6 | 9 | 10.5 | 12 | 13 | 13 | 12.5 | 76 / 57.76 | 45.2% / 34.4% | 223 / 169.48 | 33.2% / 25.2% |

| KMOV-TV, St. Louis, MO<br>Channel 4, CBS<br>*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 6, 1997* | | | | | | | | | | St. Louis Network Affiliates<br>(ABC/UPN, CBS, NBC, FOX) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | SAT. | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
| NEWSCASTS | 4 | 2 | 6.5 | 7 | 7 | 6.5 | 5.5 | 38.5 / 29.26 | 22.9% / 17.4% | 118.5 / 90.06 | 17.6% / 13.4% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 2 | 3.5 | 2 | 3 | 3 | 2 | 2 | 17.5 / 13.3 | 10.4% / 7.9% | 79 / 60.04 | 11.8% / 8.9% |
| PUBLIC AFFAIRS | 1 | 2 | - | - | - | - | - | 3 / 2.28 | 1.8% / 1.4% | 3.5 / 2.66 | 0.5% / 0.4% |
| INSTRUCTIONAL (e.g., how-to programs) | - | .5 | - | - | - | - | - | .5 / .38 | 0.3% / 0.2% | 4.5 / 3.42 | 0.7% / 0.5% |
| CHILDREN'S/ EDUCATIONAL | 3 | 1 | - | - | - | - | - | 4 / 3.04 | 2.4% / 1.8% | 18.5 / 14.06 | 2.8% / 2.1% |
| RELIGION | - | 1.5 | - | - | - | - | - | 1.5 / 1.5 | 0.9% / 0.9% | 4 / 4 | 0.6% / 0.6% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 10 | 10.5 | 8.5 | 10 | 10 | 8.5 | 7.5 | 65 / 49.4 | 38.7% / 29.4% | 228 / 173.28 | 33.9% / 25.8% |

| KGW-TV, Portland, OR<br>Channel 8, NBC<br>*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning November 29, 1997* | | | | | | | | | | Portland Network Affiliates<br>(ABC, CBS, NBC, FOX) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | SAT. | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
| NEWSCASTS | 8 | 6.5 | 8 | 8.5 | 8.5 | 8.5 | 8.5 | 56.5 / 42.94 | 33.6% / 25.6% | 148.75 / 113.05 | 22.1% / 16.8% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | - | 2 | 3 | 3 | 3 | 2 | 3 | 16 / 12.16 | 9.5% / 7.2% | 56 / 42.56 | 8.3% / 6.3% |
| PUBLIC AFFAIRS | - | 1 | - | - | - | - | - | 1 / .76 | 0.6% / 0.5% | 5 / 3.8 | 0.7% / 0.6% |
| INSTRUCTIONAL (e.g., how-to programs) | 1 | - | .5 | - | - | - | - | 1.5 / 1.14 | 0.9% / 0.7% | 11 / 8.36 | 1.6% / 1.2% |
| CHILDREN'S/ EDUCATIONAL | 2 | 1 | - | - | - | - | - | 3 / 2.28 | 1.8% / 1.4% | 15 / 11.4 | 2.2% / 1.7% |
| RELIGION | - | - | - | - | - | - | - | - | - | 4.5 / 4.5 | 0.7% / 0.7% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 11 | 10.5 | 11.5 | 11.5 | 11.5 | 10.5 | 11.5 | 78 / 59.28 | 46.4% / 35.3% | 233.25 / 177.27 | 34.7% / 26.4% |

| WCNC-TV, Charlotte, NC<br>Channel 36, NBC<br>*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning January 17, 1998* | | | | | | | | | | Charlotte Network Affiliates<br>(ABC, CBS, NBC, FOX) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | SAT. | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
| NEWSCASTS | 6.5 | 6 | 7.5 | 7.5 | 7.5 | 7.5 | 7.5 | 50 / 38 | 29.8% / 22.6% | 136 / 103.36 | 20.2% / 15.4% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 3.5 | 2.5 | 3 | 3 | 2 | 2 | 3 | 19 / 14.4 | 11.3% / 8.6% | 55.5 / 42.18 | 8.3% / 6.3% |
| PUBLIC AFFAIRS | - | 1 | - | - | - | - | - | 1 / .76 | 0.6% / 0.5% | 3 / 2.28 | 0.4% / 0.3% |
| INSTRUCTIONAL (e.g., how-to programs) | .5 | .5 | - | - | - | - | - | 1 / .76 | 0.6% / 0.5% | 6.5 / 4.94 | 1.0% / 0.7% |
| CHILDREN'S/ EDUCATIONAL | 2.5 | 1 | - | - | - | - | - | 3.5 / 2.66 | 2.1% / 1.6% | 23 / 17.48 | 3.4% / 2.6% |
| RELIGION | - | .5 | - | - | - | - | - | .5 / .5 | 0.3% / 0.3% | 20.5 / 20.5 | 3.1% / 3.1% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 13 | 11.5 | 10.5 | 10.5 | 9.5 | 9.5 | 10.5 | 75 / 57 | 44.6% / 33.9% | 244.5 / 185.82 | 36.4% / 27.7% |

## KENS-TV, San Antonio, TX

Channel 5, CBS

*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 7, 1997*

## San Antonio Network Affiliates

(ABC, CBS, NBC, FOX)

| | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | SAT. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
|---|---|---|---|---|---|---|---|---|---|---|---|
| NEWSCASTS | 1.5 | 5.5 | 7.5 | 5.5 | 5.5 | 7.5 | 3.5 | 36.5 / 27.74 | 21.7% / 16.5% | 99 / 75.24 | 14.7% / 11.2% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 2.5 | 1.5 | 1.5 | 2.5 | 1.5 | 1.5 | - | 11 / 8.36 | 6.5% / 5.0% | 61.5 / 46.74 | 9.2% / 7.0% |
| PUBLIC AFFAIRS | .5 | - | - | - | - | - | - | .5 / .38 | 0.3% / 0.2% | 3.5 / 2.66 | 0.5% / 0.4% |
| INSTRUCTIONAL (e.g., how-to programs) | - | - | - | - | - | - | .5 | .5 / .38 | 0.3% / 0.2% | 3 / 2.28 | 0.4% / 0.3% |
| CHILDREN'S/ EDUCATIONAL | - | - | - | - | - | - | 3.5 | 3.5 / 2.66 | 2.1% / 1.6% | 22.5 / 17.1 | 3.3% / 2.5% |
| RELIGION | 2 | - | - | - | - | - | - | 2 / 2 | 1.2% / 1.2% | 9 / 9 | 1.3% / 1.3% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 6.5 | 7 | 9 | 8 | 7 | 9 | 7.5 | 54 / 41.04 | 32.1% / 24.4% | 198.5 / 150.86 | 29.5% / 22.4% |

## WVEC-TV, Hampton-Norfolk, VA

Channel 13, ABC

*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 13, 1997*

## Hampton-Norfolk Network Affiliates

(ABC, CBS, NBC, FOX)

| | SAT. | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
|---|---|---|---|---|---|---|---|---|---|---|---|
| NEWSCASTS | .5 | 1.5 | 7.5 | 6 | 6.5 | 6.5 | 6.5 | 35 / 26.6 | 20.8% / 15.8% | 130 / 98.8 | 19.3% / 14.7% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | - | .5 | 3 | 4 | 4.5 | 4.5 | 4.5 | 21 / 15.96 | 12.5% / 9.5% | 59 / 44.84 | 8.9% / 6.8% |
| PUBLIC AFFAIRS | - | 2 | - | - | - | - | - | 2 / 1.52 | 1.2% / 0.9% | 4 / 3.04 | 0.6% / 0.5% |
| INSTRUCTIONAL (e.g., how-to programs) | 1 | 1 | - | - | - | - | - | 2 / 1.52 | 1.2% / 0.9% | 6 / 4.56 | 0.9% / 0.7% |
| CHILDREN'S/ EDUCATIONAL | 5.5 | - | - | - | - | - | - | 5.5 / 4.18 | 3.3% / 2.5% | 21.5 / 16.34 | 3.2% / 2.4% |
| RELIGION | - | 3.5 | | - | - | - | - | 3.5 / 3.5 | 2.1% / 2.1% | 6.5 / 6.5 | 1.0% / 1.0% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 7 | 8.5 | 10.5 | 10 | 11 | 11 | 11 | 69 / 52.44 | 41.1% / 31.2% | 227 / 172.52 | 33.8% / 25.7% |

| WWL-TV, New Orleans, LA<br>Channel 4, CBS<br><br>*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 7, 1997* | | | | | | | | | | New Orleans Network Affiliates<br><br>(ABC, CBS, NBC, FOX) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | SAT. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
| NEWSCASTS | 4 | 8.5 | 8.5 | 8.5 | 8.5 | 8.5 | 4 | 50.5 / 38.38 | 30.1% / 22.8% | 146.25 / 111.15 | 21.8% / 16.5% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 2.5 | - | 1 | 1 | - | - | - | 4.5 / 3.42 | 2.7% / 2.0% | 44 / 33.44 | 6.5% / 5.0% |
| PUBLIC AFFAIRS | - | - | - | - | - | - | - | - | - | 2.5 / 1.9 | 0.4% / 0.3% |
| INSTRUCTIONAL (e.g., how-to programs) | 1 | .5 | .5 | .5 | .5 | .5 | .5 | 4 / 3.04 | 2.4% / 1.8% | 6 / 4.56 | 0.9% / 0.7% |
| CHILDREN'S/ EDUCATIONAL | 1 | - | - | - | - | - | 2 | 3 / 2.28 | 1.8% / 1.4% | 22 / 16.72 | 3.3% / 2.5% |
| RELIGION | - | - | - | - | - | - | - | - | - | 12.5 / 12.5 | 1.9% / 1.9% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 8.5 | 9 | 10 | 10 | 9 | 9 | 6.5 | 62 / 47.12 | 36.9% / 28.0% | 233.25 / 177.27 | 34.7% / 26.4% |

## KASA-TV, Santa Fe-Albuquerque, NM

Channel 2, FOX

*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 6, 1997*

## Santa Fe-Albuquerque Network Affiliates

(ABC, CBS, NBC, FOX)

| | SAT. | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
|---|---|---|---|---|---|---|---|---|---|---|---|
| NEWSCASTS | - | - | - | - | - | - | - | - | - | 128.75 / 97.85 | 19.2% / 14.6% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | - | 1 | - | - | - | - | - | 1 / .76 | 0.6% / 0.5% | 51.75 / 39.33 | 7.7% / 5.9% |
| PUBLIC AFFAIRS | - | .5 | 1 | - | - | - | - | 1.5 / 1.14 | 0.9% / 0.7% | 4 / 3.04 | 0.6% / 0.5% |
| INSTRUCTIONAL (e.g., how-to programs) | - | - | - | - | - | - | - | - | - | 4 / 3.04 | 0.6% / 0.5% |
| CHILDREN'S/ EDUCATIONAL | 2 | 1 | 1 | 1 | 1 | 1 | 1 | 8 / 6.08 | 4.8% / 3.6% | 15 / 11.4 | 2.2% / 1.7% |
| RELIGION | - | - | - | - | - | - | - | - | - | 3 / 3 | 0.5% / 0.5% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 2 | 2.5 | 2 | 1 | 1 | 1 | 1 | 10.5 / 7.98 | 6.3% / 4.8% | 206.5 / 156.94 | 30.7% / 23.4% |

| WHAS-TV, Louisville, KY<br>Channel 11, ABC<br>*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 7, 1997* | | | | | | | | | | Louisville Network Affiliates<br>(ABC, CBS, NBC, FOX) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | SAT. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
| NEWSCASTS | 1.5 | 5.5 | 4.5 | 4 | 4 | 4 | 5.5 | 29 / 22.04 | 17.3% / 13.1% | 119.5 / 90.82 | 17.8% / 13.5% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | .5 | 3.5 | 4.5 | 5 | 5 | 5 | - | 23.5 / 17.86 | 14.0% / 10.6% | 61.5 / 46.74 | 9.2% / 7.0% |
| PUBLIC AFFAIRS | 1 | - | - | - | - | - | - | 1 / .76 | 0.6% / 0.5% | 2 / 1.52 | 0.3% / 0.2% |
| INSTRUCTIONAL (e.g., how-to programs) | - | .5 | .5 | .5 | .5 | .5 | - | 2.5 / 1.9 | 1.5% / 1.1% | 3.5 / 2.66 | 0.5% / 0.4% |
| CHILDREN'S/ EDUCATIONAL | - | - | - | - | - | - | 4 | 4 / 3.04 | 2.4% / 1.8% | 17 / 12.92 | 2.5% / 1.9% |
| RELIGION | 4.5 | - | - | - | - | - | - | 4.5 / 4.5 | 2.7% / 2.7% | 5.5 / 5.5 | 0.8% / 0.8% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 7.5 | 9.5 | 9.5 | 9.5 | 9.5 | 9.5 | 9.5 | 64.5 / 49.02 | 38.4% / 29.2% | 209 / 158.84 | 31.1% / 23.6% |

| KTVB-TV, Boise, ID<br>Channel 7, NBC<br>*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 7, 1997* | | | | | | | | | | Boise Network Affiliates<br>(ABC, CBS, NBC, FOX) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | SAT. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
| NEWSCASTS | 8.5 | 9.5 | 9 | 9 | 9 | 9 | 6.5 | 60.5 / 45.98 | 36% / 27.4% | 119.5 / 90.82 | 17.8%13.5% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 2 | 3 | 3 | 2 | 2 | 3 | 2.5 | 17.5 / 13.3 | 10.4% / 7.9% | 62.5 / 47.5 | 9.3% / 7.1% |
| PUBLIC AFFAIRS | 1.5 | - | - | - | - | - | - | 1.5 / 1.14 | 0.9% / 0.7% | 3.5 / 2.66 | 0.5% / 0.4% |
| INSTRUCTIONAL (e.g., how-to programs) | - | - | - | - | - | - | - | - | - | 6.5 / 4.94 | 1.0% / 0.7% |
| CHILDREN'S/ EDUCATIONAL | .5 | - | - | - | - | - | 3.5 | 4 / 3.04 | 2.4% / 1.8% | 21.5 / 16.34 | 3.2% / 2.4% |
| RELIGION | - | - | - | - | - | - | - | - | - | 2 / 2 | 0.3% / 0.3% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 12.5 | 12.5 | 12 | 11 | 11 | 12 | 12.5 | 83.5 / 63.46 | 49.7% / 37.8% | 215.5 / 163.78 | 32.1% / 24.4% |

## KHNL-TV, Honolulu, HI

Channel 13, NBC

*News, Public Affairs, and Other Non-Entertainment Programming (in hours) broadcast between 7:00 a.m. and 1:00 a.m. for the week beginning December 7, 1997*

## Honolulu Network Affiliates

(ABC, CBS, NBC, FOX)

| | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | SAT. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
|---|---|---|---|---|---|---|---|---|---|---|---|
| NEWSCASTS | 1.5 | 2 | 2 | 2 | 2 | 2 | 1.5 | 13 / 9.88 | 10.3% / 7.8% | 48 / 36.48 | 9.5% / 7.2% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 1 | 3 | 3 | 2 | 2 | 3 | - | 14 / 10.64 | 11.1% / 8.4% | 57.5 / 43.7 | 11.4% / 8.7% |
| PUBLIC AFFAIRS | - | - | - | - | - | - | - | - | - | .5 / .38 | 0.1% / 0.1% |
| INSTRUCTIONAL (e.g., how-to programs) | 1.5 | - | - | - | - | - | - | 1.5 / 1.14 | 1.2% / 0.9% | 8 / 6.08 | 1.6% / 1.2% |
| CHILDREN'S/ EDUCATIONAL | - | - | - | - | - | - | 4 | 4 / 3.04 | 3.2% / 2.4% | 16.5 / 12.54 | 3.3% / 2.5% |
| RELIGION | - | - | - | - | - | - | - | - | - | 1.5 / 1.5 | 0.3% / 0.3% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 4 | 5 | 5 | 4 | 4 | 5 | 5.5 | 32.5 / 24.7 | 25.8% / 19.6% | 132 / 100.32 | 26.2% / 19.9% |

## KREM-TV, Spokane, WA

**Channel 2, CBS**

*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning November 29, 1997*

## Spokane Network Affiliates

**(ABC, CBS, NBC, FOX)**

| | SAT. | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
|---|---|---|---|---|---|---|---|---|---|---|---|
| NEWSCASTS | 2.5 | 1.5 | 7.5 | 8 | 8 | 8 | 8 | 43.5 / 33.06 | 25.9% / 19.7% | 131.5 / 99.94 | 19.6% / 14.9% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 2 | 2.5 | 2 | 2 | 3 | 2 | 2 | 15.5 / 11.78 | 9.2% / 7.0% | 54.5 / 41.42 | 8.1% / 6.2% |
| PUBLIC AFFAIRS | - | .5 | - | - | - | - | - | .5 / .38 | 0.3% / 0.2% | 1.5 / 1.14 | 0.2% / 0.2% |
| INSTRUCTIONAL (e.g., how-to programs) | - | 2 | .5 | .5 | .5 | .5 | .5 | 4.5 / 3.42 | 2.7% / 2.0% | 7 / 5.32 | 1.0% / 0.8% |
| CHILDREN'S/ EDUCATIONAL | 2 | 1 | - | - | - | - | - | 3 / 2.28 | 1.8% / 1.4% | 14.5 / 11.02 | 2.2% / 1.6% |
| RELIGION | - | - | - | - | - | - | - | - | - | 4 / 4 | 0.6% / 0.6% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 6.5 | 7.5 | 10 | 10.5 | 11.5 | 10.5 | 10.5 | 67 / 50.92 | 39.9% / 30.3% | 213 / 161.88 | 31.7% / 24.1% |

| KMSB-TV, Tucson, AZ<br>Channel 11, FOX<br>*News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning January 3, 1998* | | | | | | | | | | Tucson Network Affiliates<br>(ABC, CBS, NBC, FOX) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | SAT. | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
| NEWSCASTS | - | 1 | - | - | - | - | - | 1 / .76 | 0.6% / 0.5% | 109 / 82.84 | 16.2% / 12.3% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | - | - | - | - | - | - | - | - | - | 50 / 38 | 7.4% / 5.7% |
| PUBLIC AFFAIRS | - | .5 | - | - | - | - | - | .5 / .38 | 0.3% / 0.2% | 8.5 / 6.46 | 1.3% / 1.0% |
| INSTRUCTIONAL (e.g., how-to programs) | - | - | - | - | - | - | - | - | - | 8 / 6.08 | 1.2% / 0.9% |
| CHILDREN'S/ EDUCATIONAL | 1.5 | 1 | 1 | 1 | 1 | 1 | .5 | 7 / 5.32 | 4.2% / 3.2% | 13.5 / 10.26 | 2.0% / 1.5% |
| RELIGION | - | - | - | - | - | - | - | - | - | 10.5 / 10.5 | 1.6% / 1.6% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 1.5 | 2.5 | 1 | 1 | 1 | 1 | .5 | 8.5 / 6.46 | 5.1% / 3.8% | 199.5 / 151.62 | 29.7% / 22.6% |

## KOTV, Tulsa, OK

**Channel 6, CBS**

***News, Public Affairs, and Other Non-Entertainment Programming (in hours) for the week beginning December 7, 1997***

## Tulsa Network Affiliates

**(ABC, CBS, NBC, FOX)**

| | SUN. | MON. | TUES. | WEDS. | THURS. | FRI. | SAT. | WEEKLY TOTAL / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES / DISCOUNTED FOR COMMERCIALS | WEEKLY TOTAL FOR ALL NETWORK AFFILIATES AS PERCENTAGE OF TOTAL PROGRAMMING / DISCOUNTED FOR COMMERCIALS |
|---|---|---|---|---|---|---|---|---|---|---|---|
| NEWSCASTS | 1.5 | 6.5 | 6.5 | 6.5 | 6.5 | 6.5 | 2 | 36 / 27.36 | 21.4% / 16.3% | 104.5 / 79.42 | 15.6% / 11.8% |
| NEWS/INFORMATION (e.g., news "magazines," morning news programs) | 2.5 | 4 | 5 | 5 | 4 | 4 | 2 | 26.5 / 20.14 | 15.8% / 12.0% | 68 / 51.68 | 10.1% / 7.7% |
| PUBLIC AFFAIRS | 1.5 | - | - | - | - | - | - | 1.5 / 1.14 | 0.9% / 0.7% | 4 / 3.04 | 0.6% / 0.5% |
| INSTRUCTIONAL (e.g., how-to programs) | - | - | - | - | - | - | - | - | - | 4.5 / 3.42 | 0.7% / 0.5% |
| CHILDREN'S/ EDUCATIONAL | 1 | - | - | - | - | - | 2 | 3 / 2.28 | 1.8% / 1.4% | 21.5 / 16.34 | 3.2% / 2.4% |
| RELIGION | 2 | - | - | - | - | - | - | 2 / 2 | 1.2% / 1.2% | 17.5 / 17.5 | 2.6% / 2.6% |
| TOTAL NON-ENTERTAINMENT PROGRAMMING | 8.5 | 10.5 | 11.5 | 11.5 | 10.5 | 10.5 | 6 | 69 / 52.44 | 41.1% / 31.2% | 220 / 167.2 | 32.7% / 24.9% |