

ORIGINAL



Communications, Inc.

Our 157<sup>th</sup> Year  
February 12, 2002

ORIGINAL

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One South Parker Drive  
P. O. Box 5001  
Janesville, WI 53547-5001  
Phone [608] 754-3311  
Fax [608] 754-8038  
www.gazetteextra.com

NEWSPAPER DIVISION  
The Janesville Gazette, Janesville, WI  
Eagle-Herald, Marinette, WI  
Daily Globe, Ironwood, MI  
The Monroe Times, Monroe, WI  
The Delavan Enterprise, Delavan, WI  
The Week, Delavan, WI  
The Jotter, Janesville, WI  
Freeport iNK, Freeport, IL  
Stephco iNK, Lena, IL

RADIO BROADCAST DIVISION  
WCLO/WJVL, Janesville, WI  
WFHR/WGLX, Wisconsin Rapids, WI  
WBKV/WBWI, West Bend, WI  
WRJN/WEZY, Racine, WI

EX PARTE OR LATE FILED

Chairman Michael Powell  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
TW-A325  
Washington, D.C. 20554

Re: MM Docket No. 01-235

Dear Chairman Powell:

I write you to respectfully request the repeal of the Newspaper/Broadcast Cross-Ownership Ban. My company is uniquely qualified to act as an example of the positive impact on a community created by newspaper/broadcast cross-ownership.

Janesville, Wisconsin's population is 60,000 people and we've owned *The Janesville Gazette* since 1883. WCLO-AM is one of Wisconsin's very first AM radio stations having gone on the air in 1930. WJVL-FM started broadcasting in 1947. We've owned and operated both stations since their inception and WCLO-AM went on the air under my father's leadership with a news/talk format.

Today, 72 years later, we are all news, contrary to formats on most mid-size market AM stations. We have maintained, and in fact, increased our commitment, both financially and in staffing levels to local news and events in both the newspaper and radio stations. Our stations and newspaper are highly respected by civic leaders, educators, and the community as a whole. We are the community's source for news and both organizations aggressively compete against each other for the news.

Although, at one time in our history, we were the only radio station and daily newspaper in town, today there is another local FM, a half dozen other newspapers circulating in our area, and a variety of information available through Charter Communications, which operates our cable television system with local programming and advertising. Several billboard companies, multiple Internet service providers, a competing shopper, any number of competing radio signals, and the telephone company provide additional information in the market. Obviously, all these new information disseminators have come into the market post cross-ownership and several emerged following the ban. They are economically viable and provide diversity of opinion and information.

No. of Copies rec'd 011  
List A B C D E

Chairman Michael Powell  
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The strength of our franchise allows us to provide the public with a diverse plethora of information and sometimes we partner up and use our combined expertise to jointly produce such things as political forums and public debates.

In our case, cross-ownership doesn't stifle or impede diversity. It enriches and enhances both the volume and quality of public information. Both organizations independently give freely of staff time and money in the community. They have powerful separate identities, but when there is an outcry for change, the strength of our franchise enables us to be the engine for change. Our radio news team brings people real-time news events as they occur and our newspaper team gives those stories the depth and perspective they deserve. Only our long history of news-gathering experience and our knowledge of this community assure this type of commitment to a well-informed public.

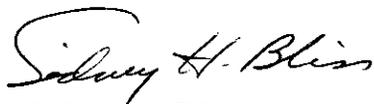
Because of our long relationship with local businesses, they turn to us, but it is a very competitive environment with all of the other media I previously mentioned. Our advertising rates are consistently in line with comparably sized radio stations and newspapers in Wisconsin. There are lots of alternatives if our pricing structures aren't competitive. Local advertisers depend on our radio stations and newspaper to help them grow their businesses.

As a newspaper company, we understand our product is news and if we were able to acquire radio stations where we operate newspapers, we would bring local news coverage to stations that have none now and for the most part are not in an economic position to offer that caliber news. The cross-ownership ban is outdated and antiquated. As newspaper and broadcast owners, we are the only potential acquirers of these franchises who are forced to sit on the sidelines and be discriminated against, while all the previously mentioned competitors have a field day purchasing these properties. This ban, which has been promoted by a couple of United States senators with a 30-year-old axe to grind against the media, puts us at a competitive disadvantage and it is high time to eliminate the cross-ownership ban.

Chairman Michael Powell  
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As I indicated, I believe our company stands as a shining example of how small to medium size communities stand to benefit from the economic strength and news gathering experience of a cross-owned newspaper/broadcast franchise. I stand ready to answer any further questions you might have regarding this subject.

Yours very truly,

A handwritten signature in cursive script that reads "Sidney H. Bliss".

Sidney H. Bliss  
President and CEO

CC: Commissioner Martin  
Commissioner Abernathy  
Commissioner Copps



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February 11, 2002

Chairman Michael Powell  
Federal Communications Commission



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I have included current research materials to support the position that despite many years of cross-ownership, subsequently formed competitors are alive and well.

The enclosed materials are 2001 Moir research and each of the other media, be they newspaper, shopper, radio, or television, have come into existence since the advent of our cross-ownership situation.

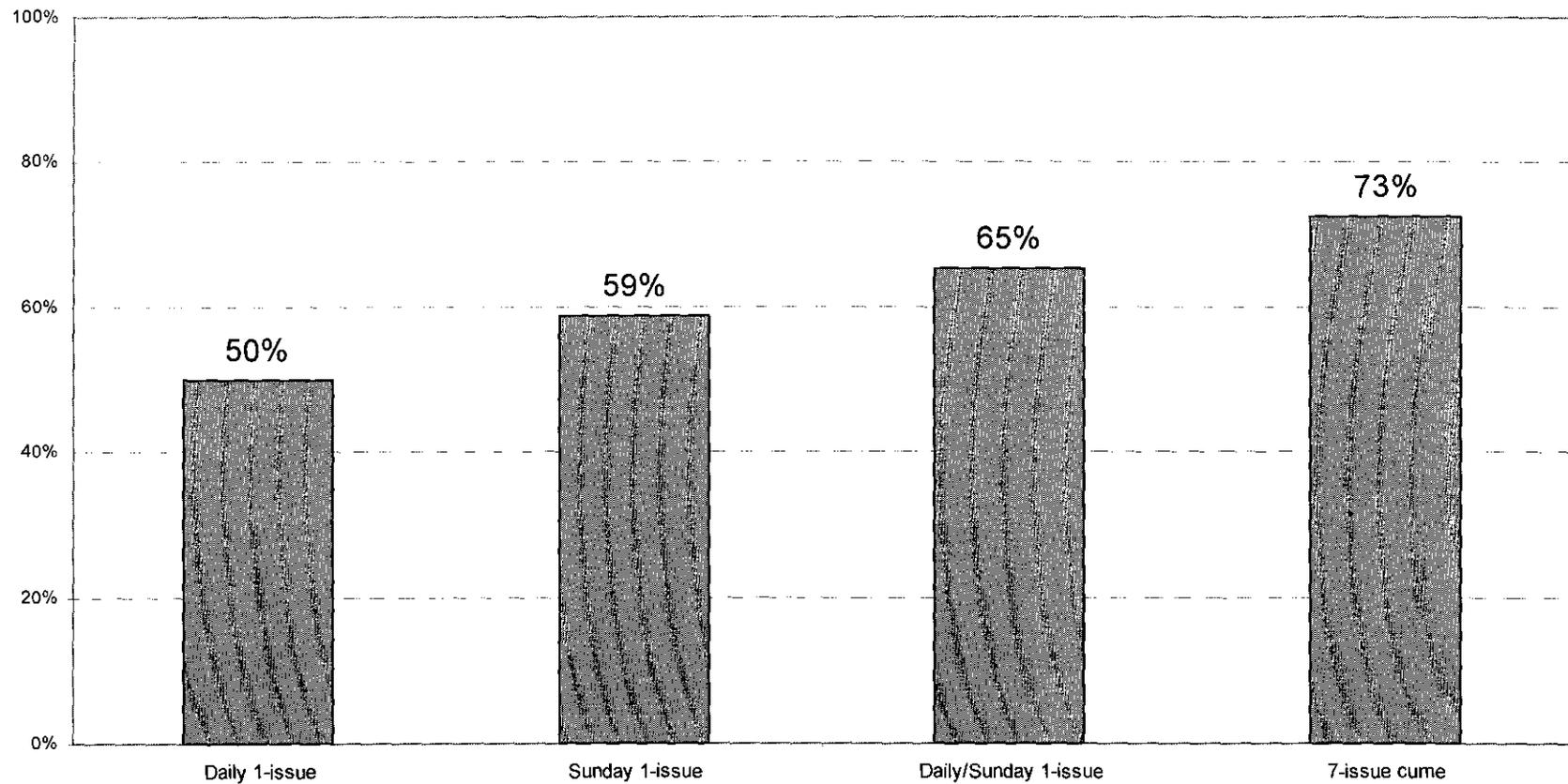
The community and our advertisers are served by a large number of diverse voices and cross-ownership has done nothing to impede that.

A handwritten signature in cursive script that reads 'Sidney H. Bliss'.

Sidney H. Bliss  
President and CEO

# Readership Cume: PMA

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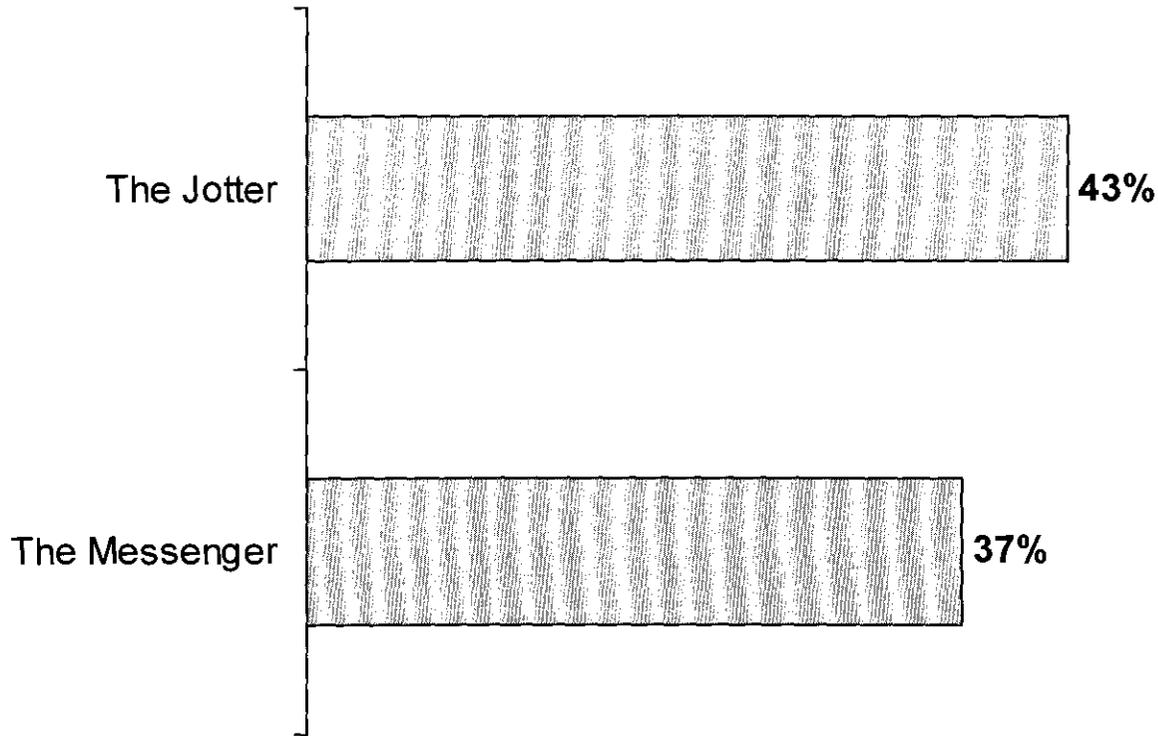


Source: Minnesota Opinion Research Incorporated; 2001 Market Study  
Base: Total adults in Rock County excluding Beloit = 79,500

**The Gazette**  
Janesville

# Weekly Publication Readership

Past 7 Days



Source: Minnesota Opinion Research Incorporated; 2001 Market Study

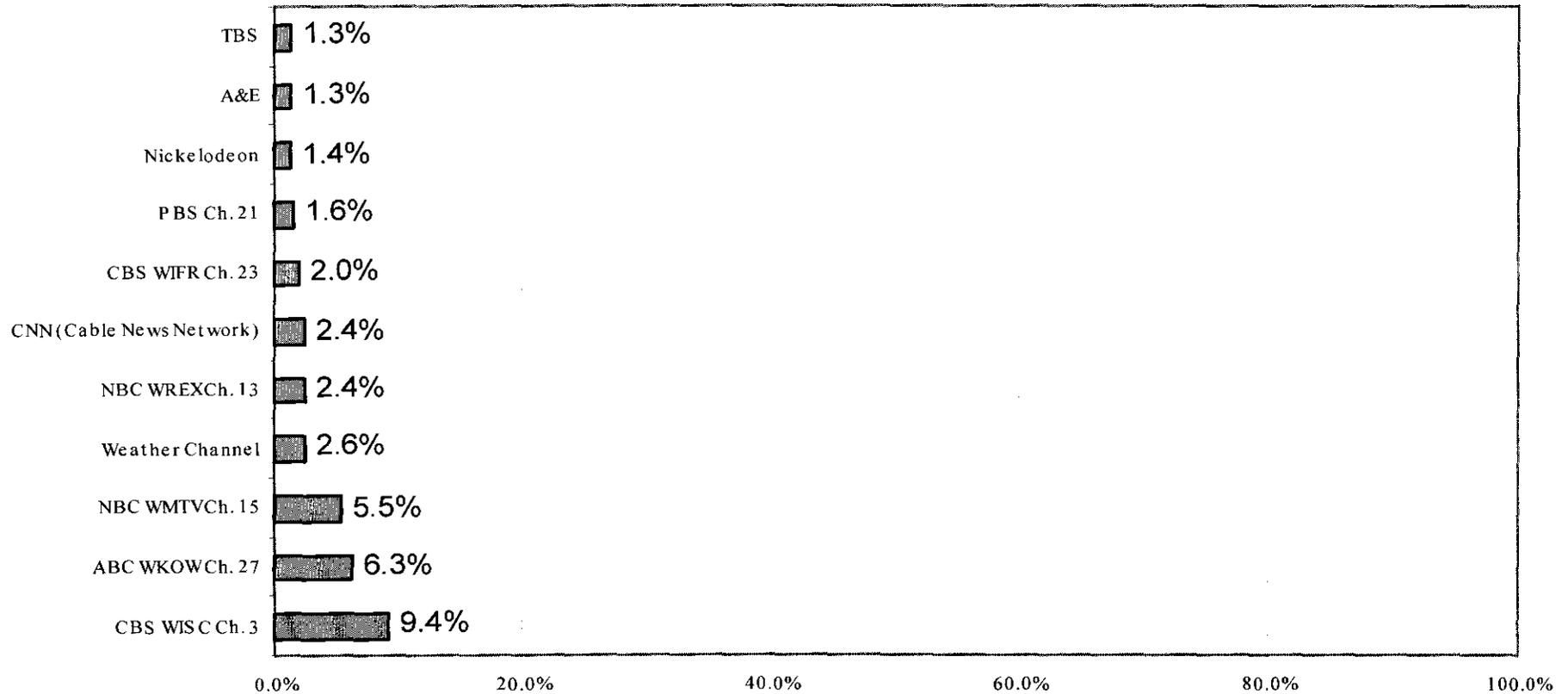
Base: Total adults in Rock County excluding Beloit = 79,500

Question: The Jotter is a weekly publication that contains classified advertising and circulars. In the past seven days have you read or looked into The Jotter?  
The Messenger is a weekly publication that contains classified advertising and circulars. In the past seven days have you read or looked into The Messenger?

**The Gazette** Janesville

# Television Viewership: 6 AM-9 AM

Slide 1 of 4

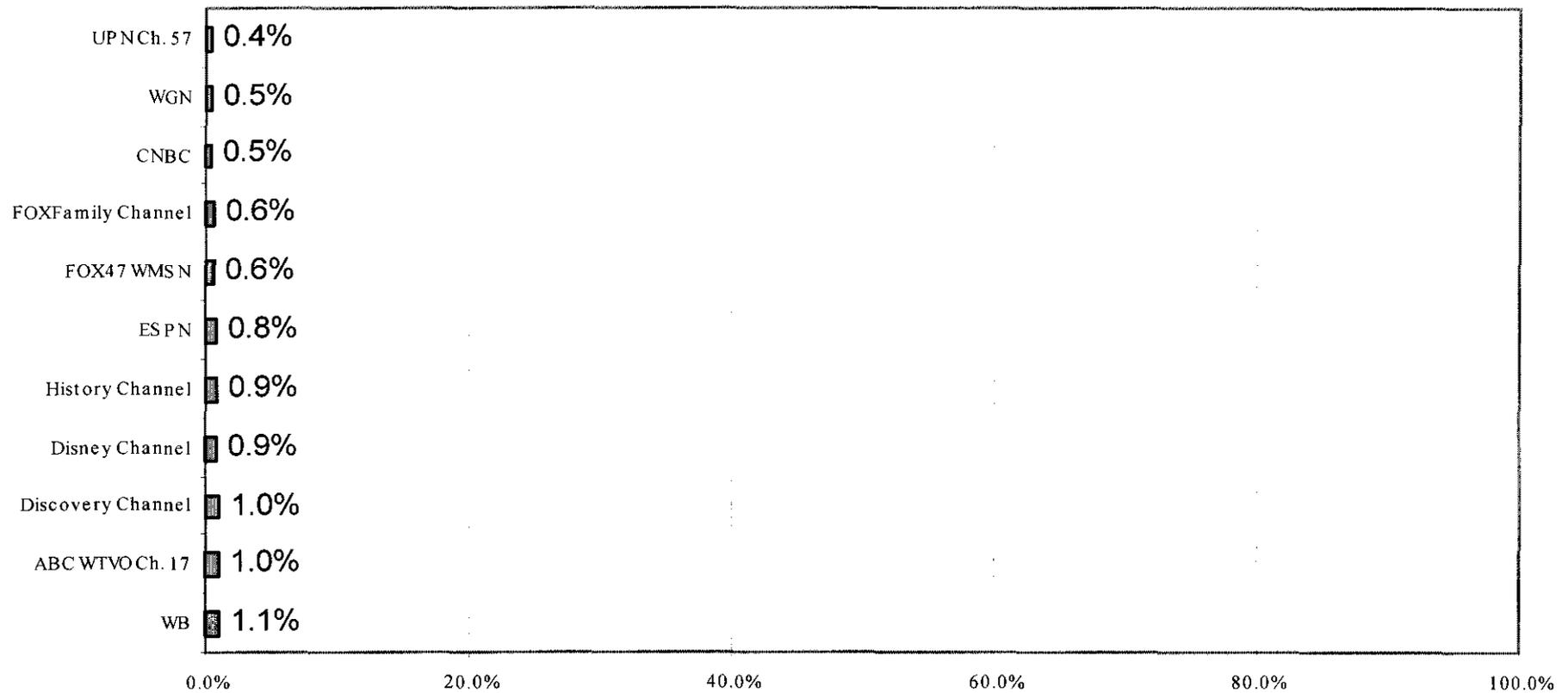


Source: Minnesota Opinion Research Incorporated; 2001 Market Study  
Base: Total adults in Rock County excluding Beloit = 79,500  
Question: Did you watch any television yesterday during 6 a.m. and 9 a.m.?

The Gazette Janesville

# Television Viewership: 6AM-9AM

Slide 2 of 4

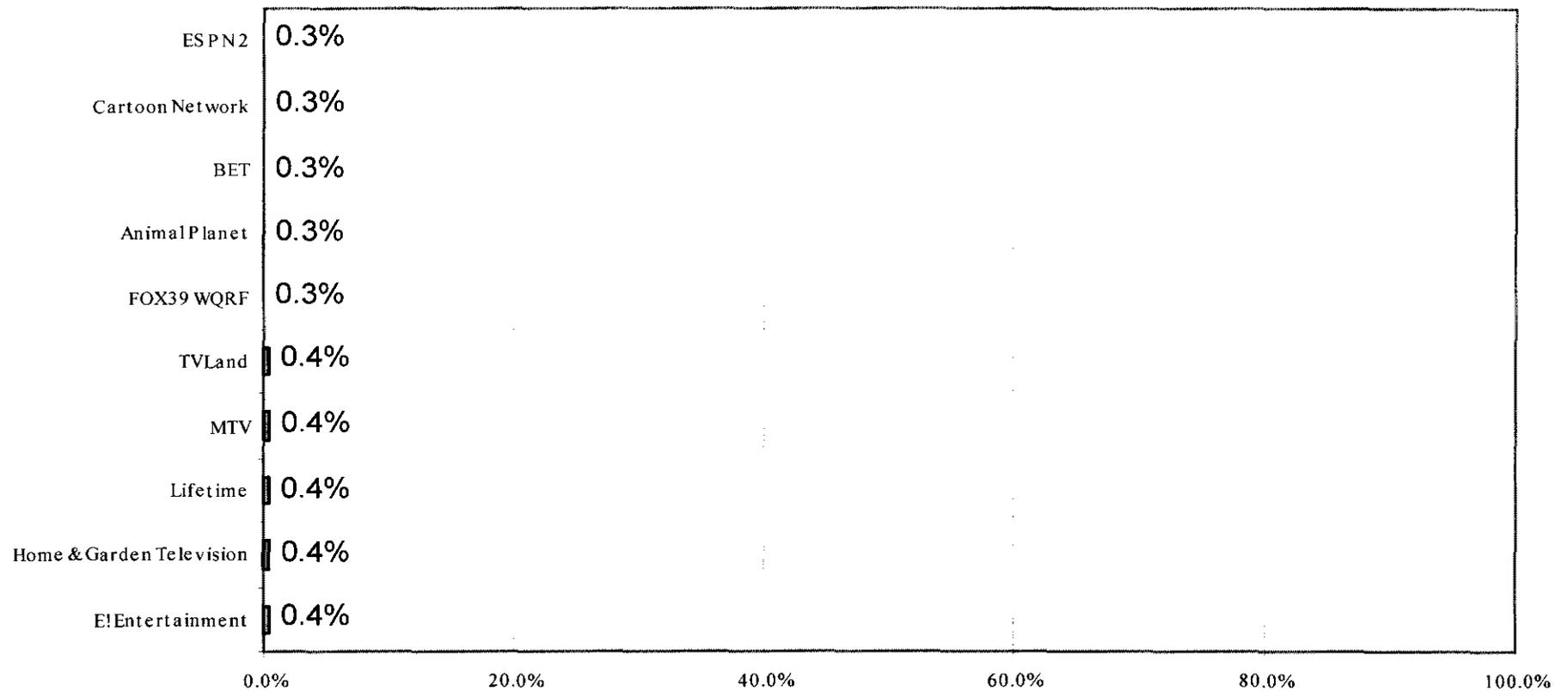


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Base: Total adults in Rock County excluding Beloit = 79,500  
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The Gazette Janesville

# Television Viewership: 6AM-9AM

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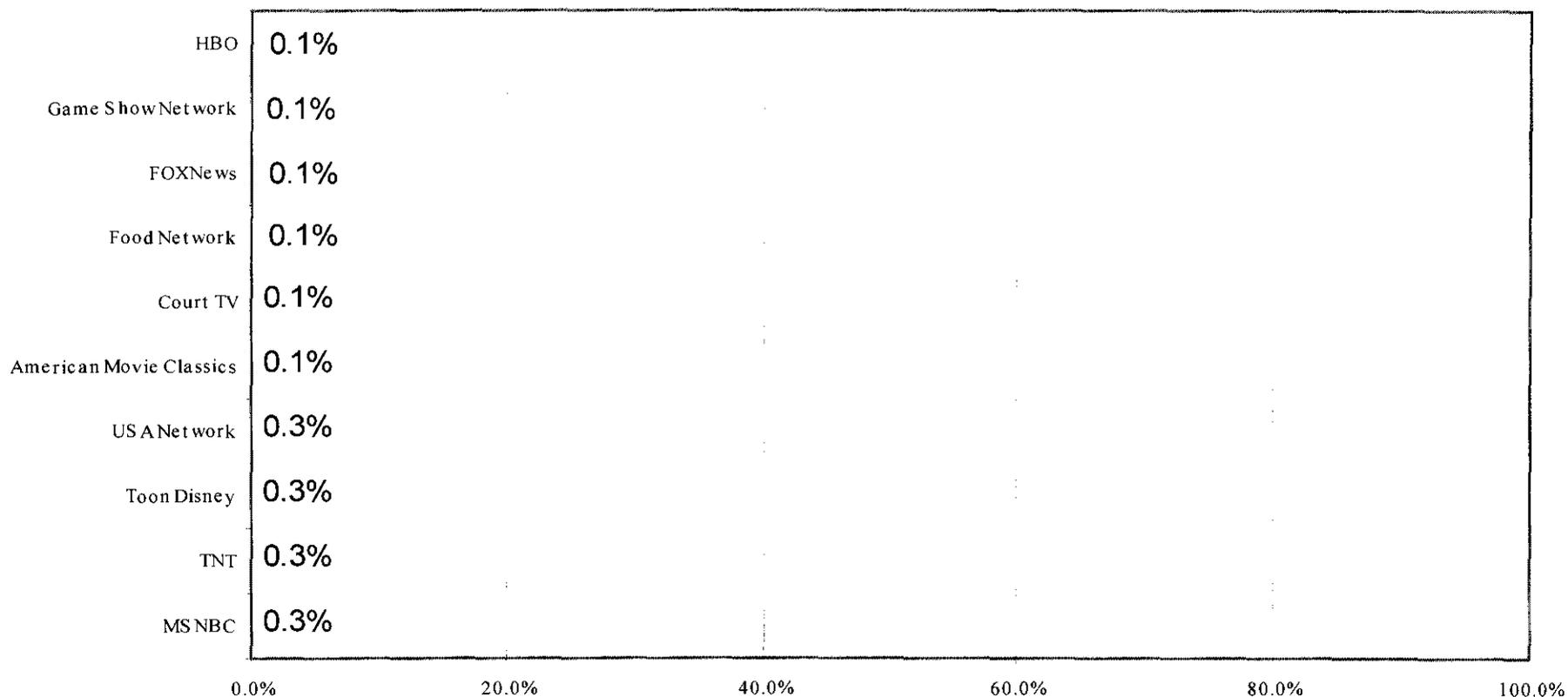


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The Gazette <sup>Janesville</sup>

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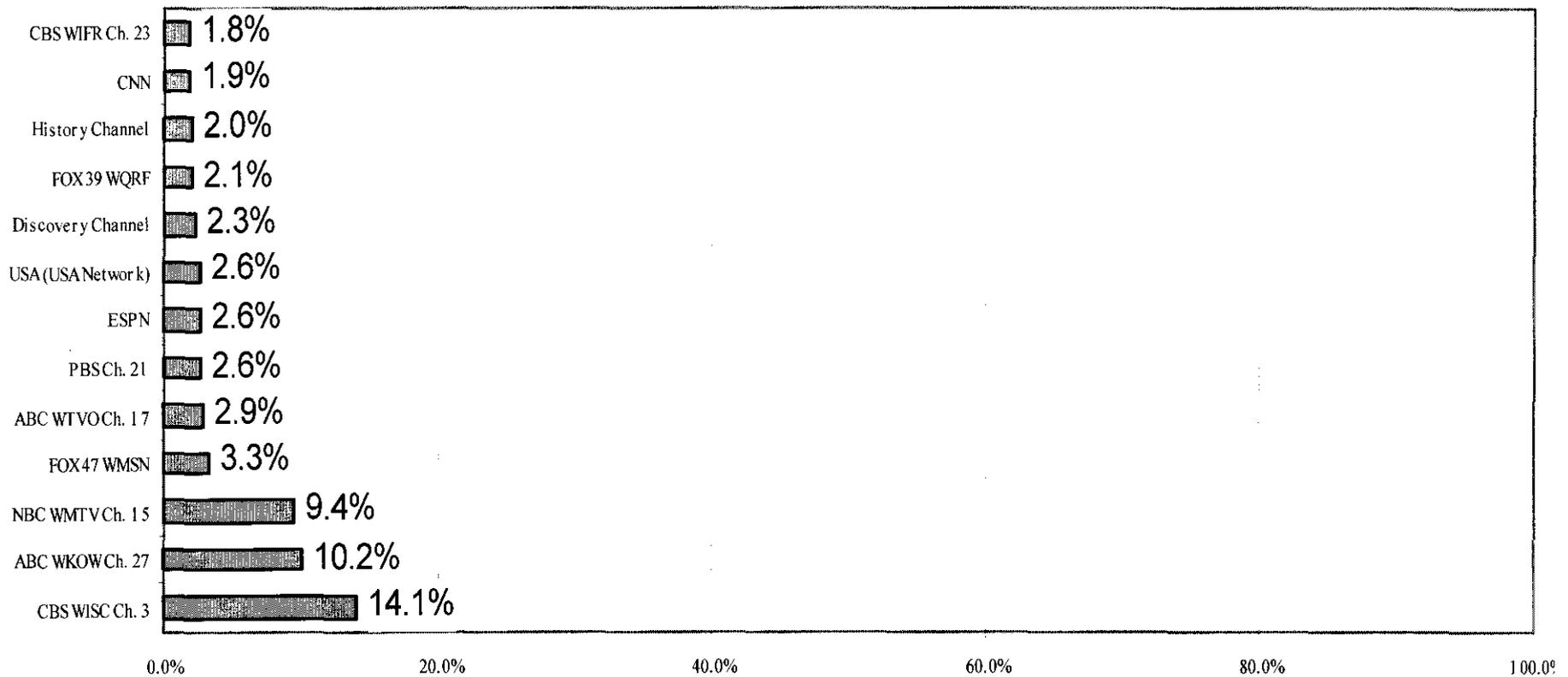


Source: Minnesota Opinion Research Incorporated; 2001 Market Study  
Base: Total adults in Rock County excluding Beloit = 79,500  
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The Gazette Janesville

# Television Viewership: 4 PM - 7 PM

Slide 1 of 5

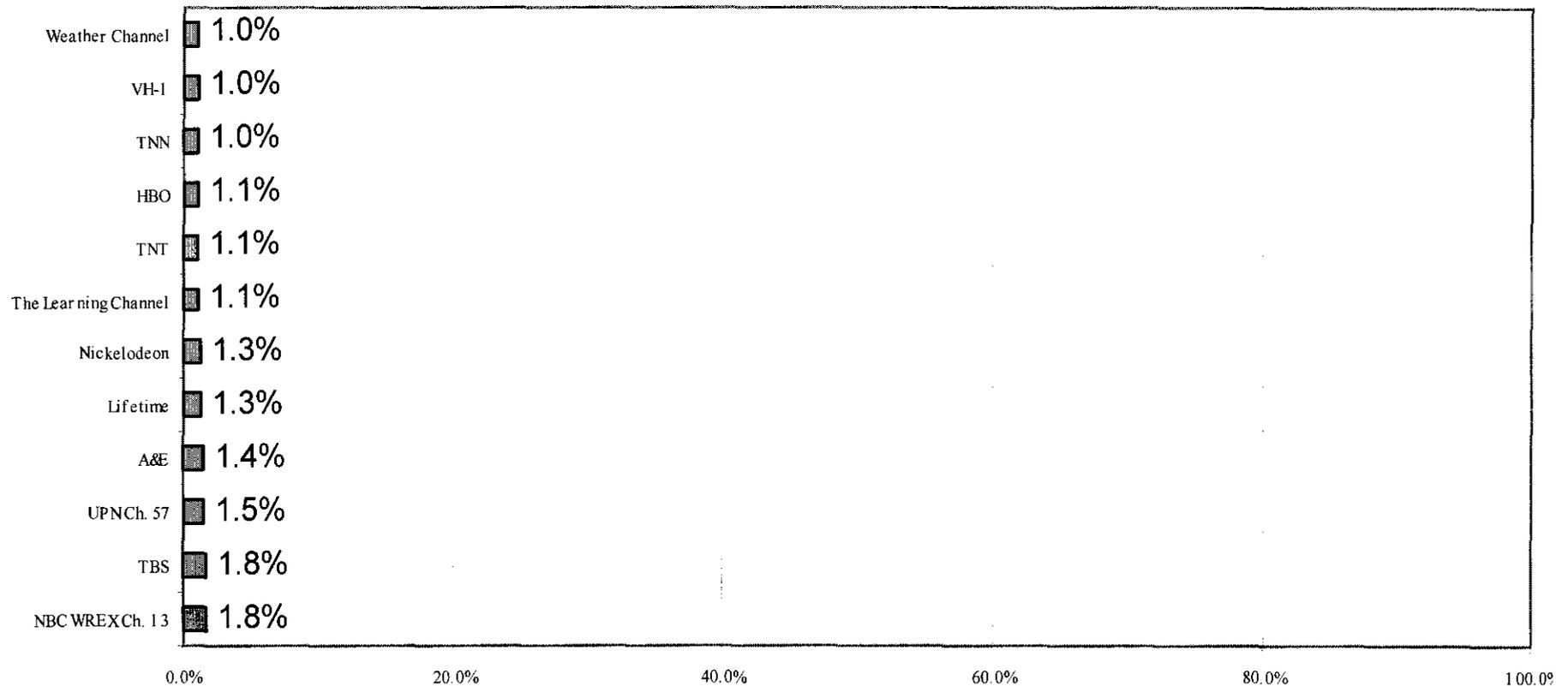


Source: Minnesota Opinion Research Incorporated; 2001 Market Study  
Base: Total adults in Rock County excluding Beloit = 79,500  
Question: Did you watch any television yesterday during 4 p.m. and 7 p.m.?

The Gazette Janesville

# Television Viewership: 4 PM- 7 PM

Slide 2 of 5

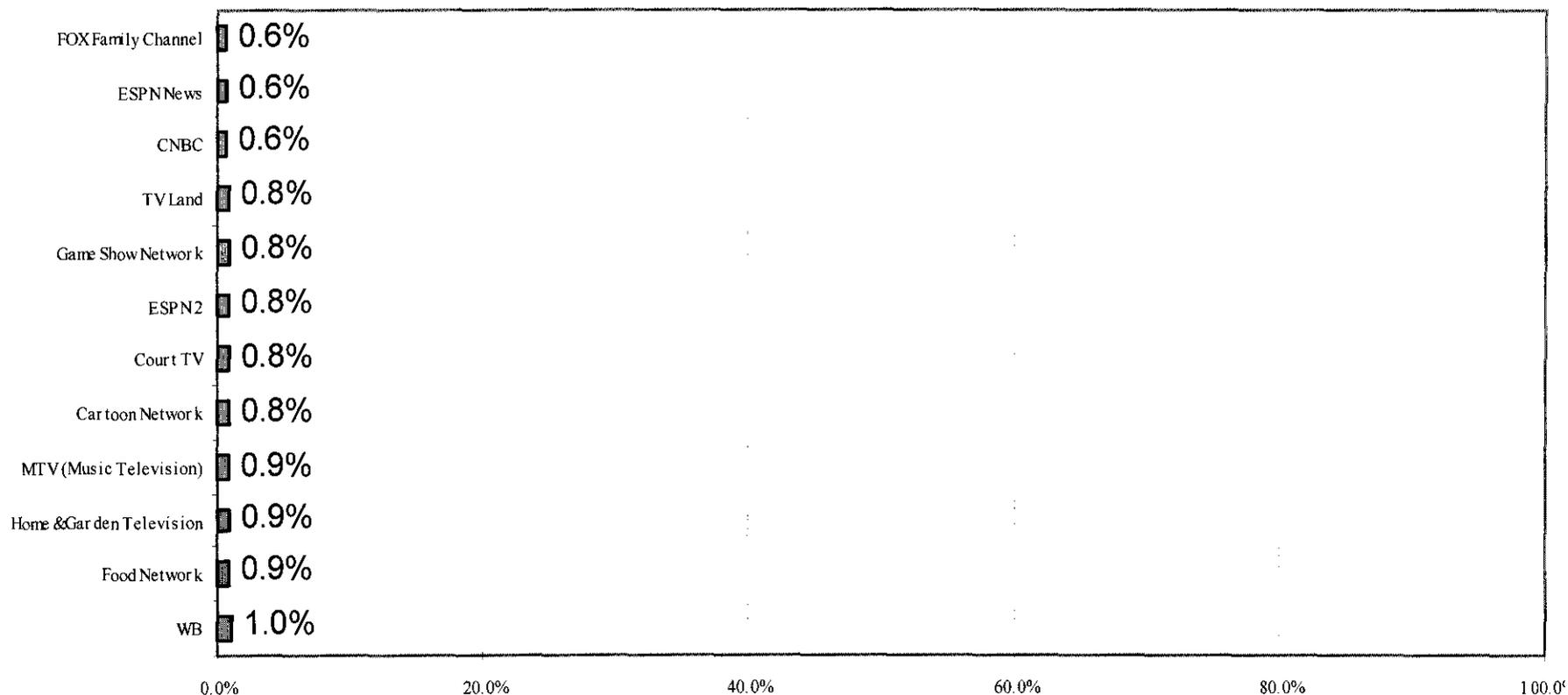


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The <sup>Janesville</sup> Gazette

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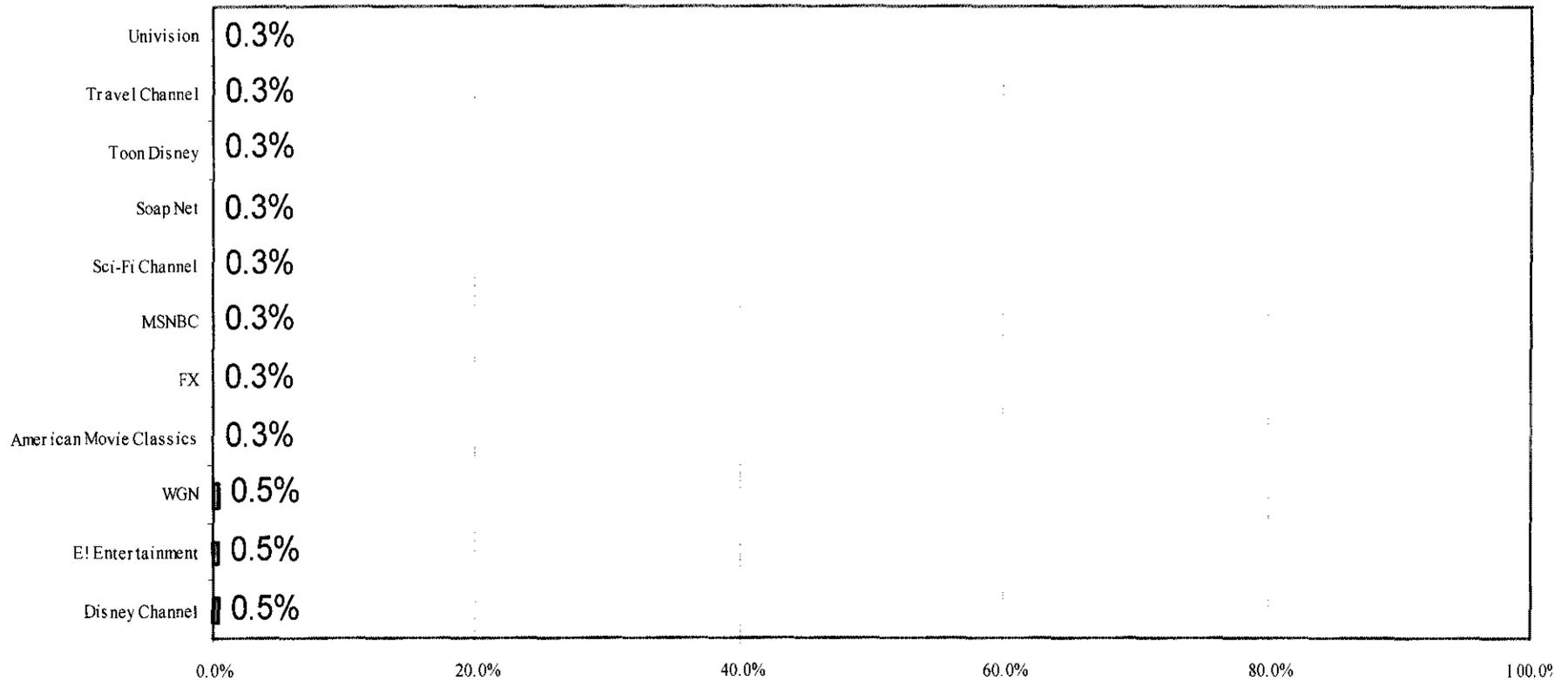


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**The Gazette** Janesville

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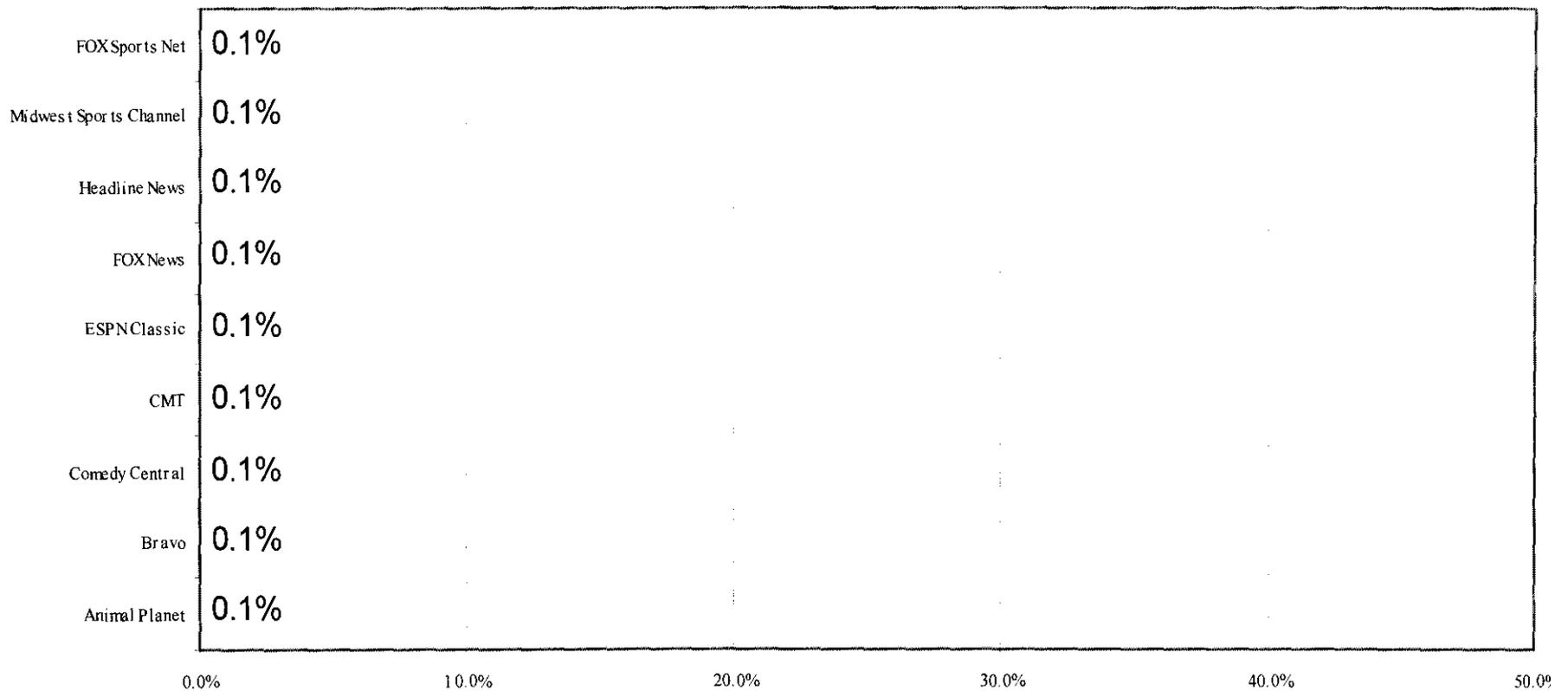


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The Gazette <sup>Janesville</sup>

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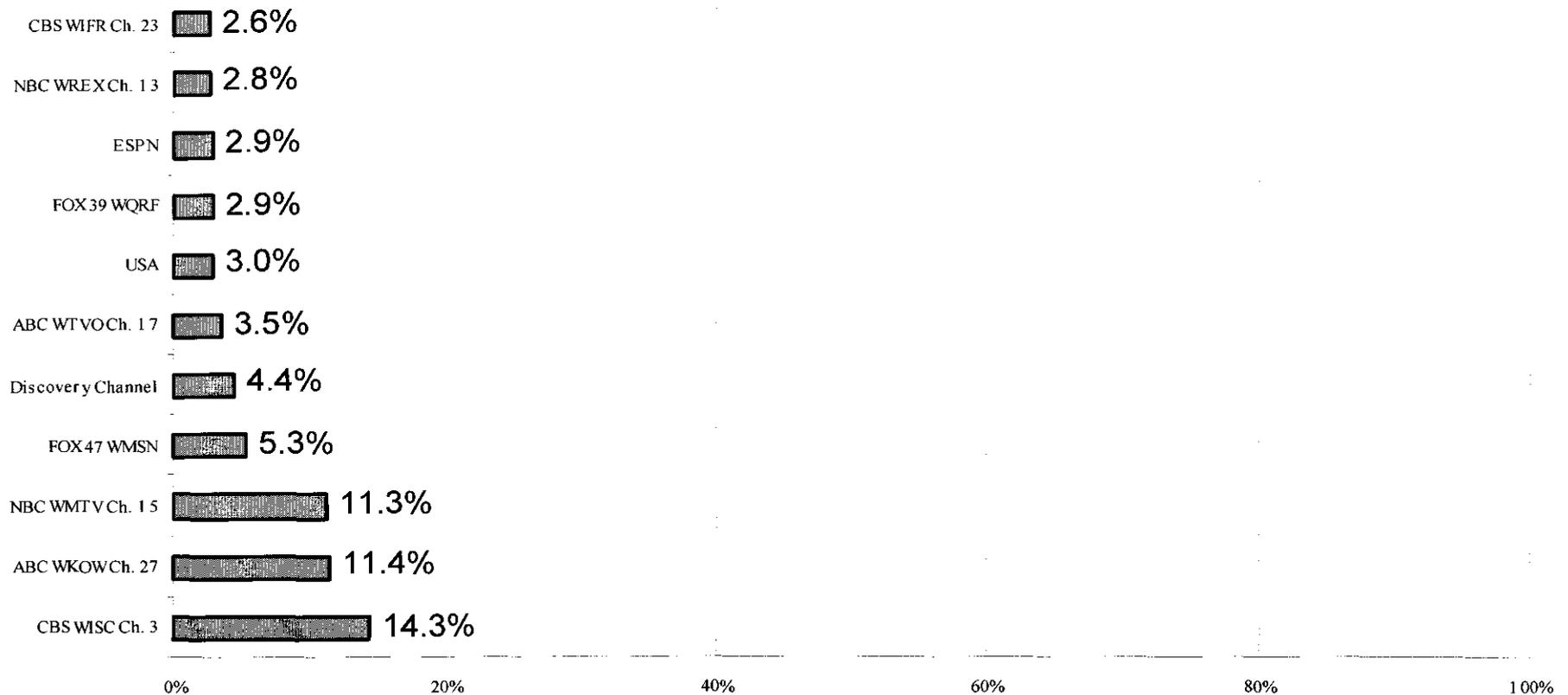


Source: Minnesota Opinion Research Incorporated; 2001 Market Study  
Base: Total adults in Rock County excluding Beloit = 79,500  
Question: Did you watch any television yesterday during 4 p.m. and 7 p.m.?

**The Gazette** Janesville

# Television Viewership: 7 PM - 11 PM

Slide 1 of 7

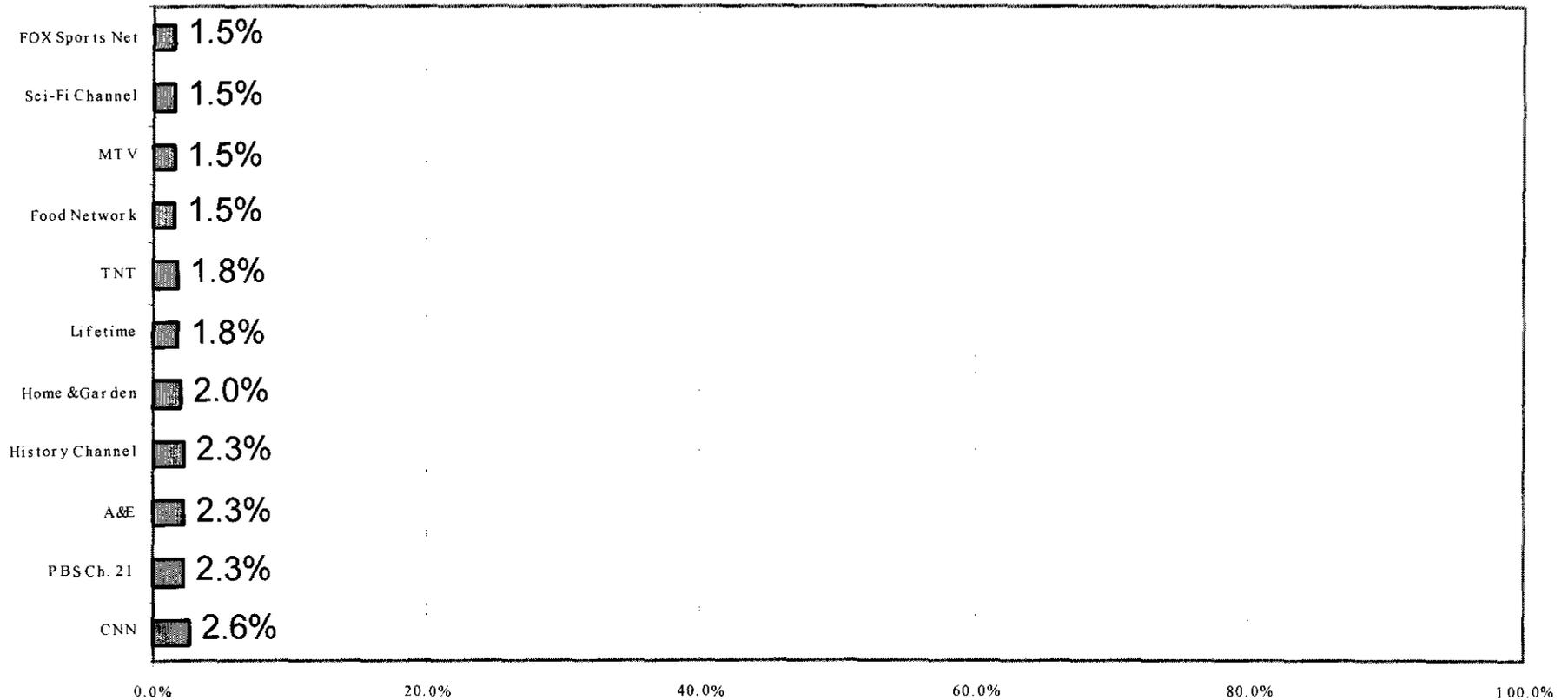


Source: Minnesota Opinion Research Incorporated; 2001 Market Study  
Base: Total adults in Rock County excluding Beloit = 79,500  
Question: Did you watch any television yesterday during 7 p.m. and 11 p.m.?

The Gazette <sup>Janesville</sup>

# Television Viewership: 7 PM- 11 PM

Slide 2 of 7

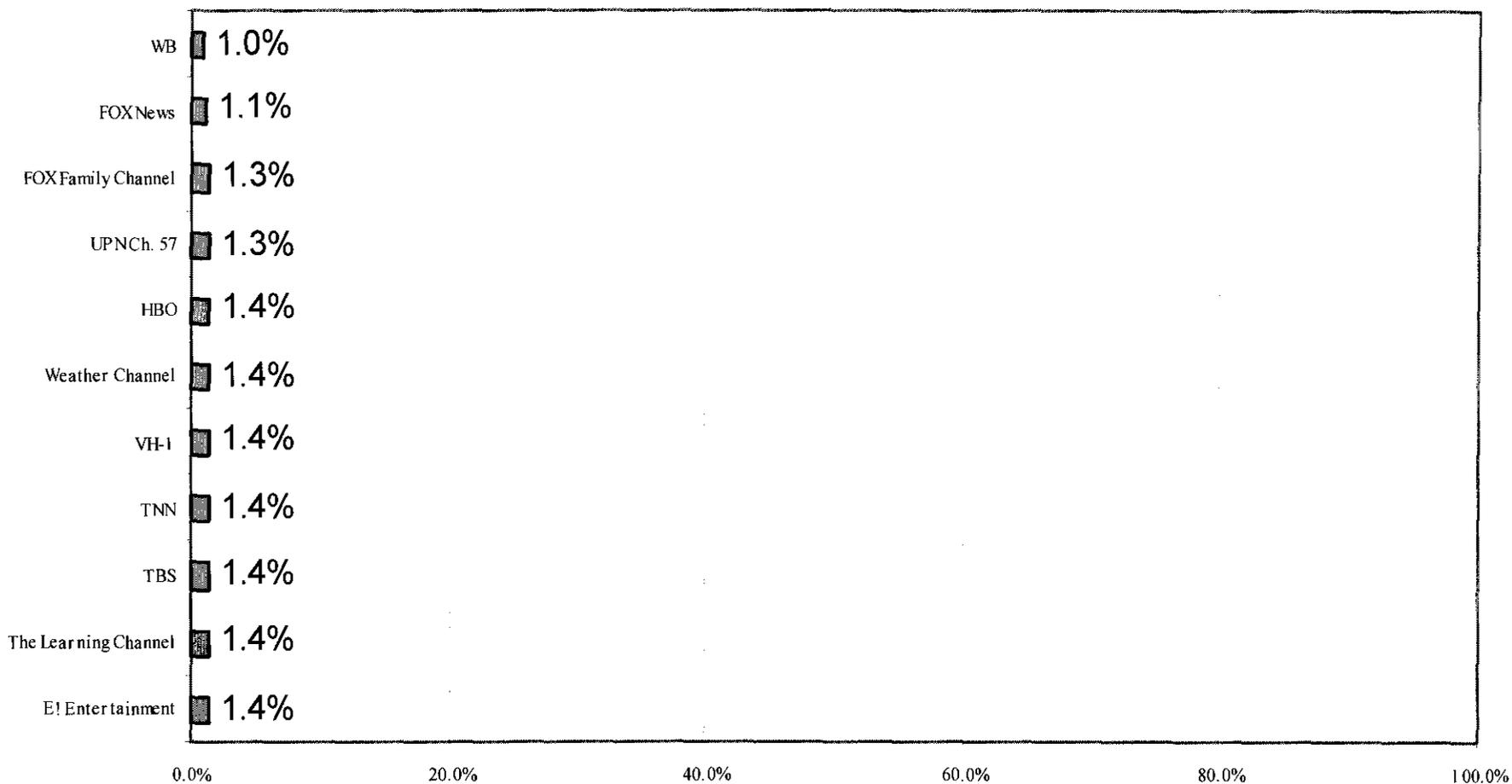


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**The Gazette** Janesville

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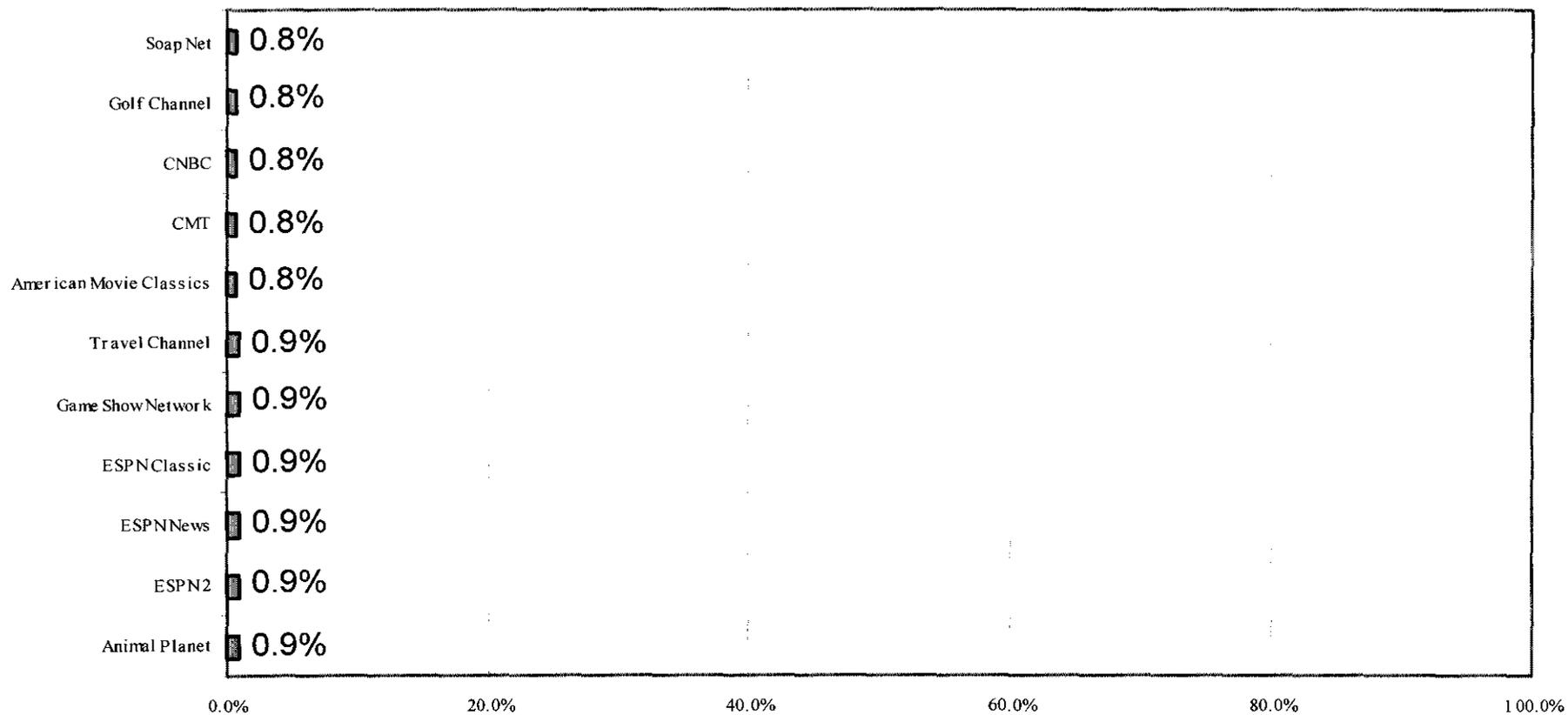


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**The Gazette** Janesville

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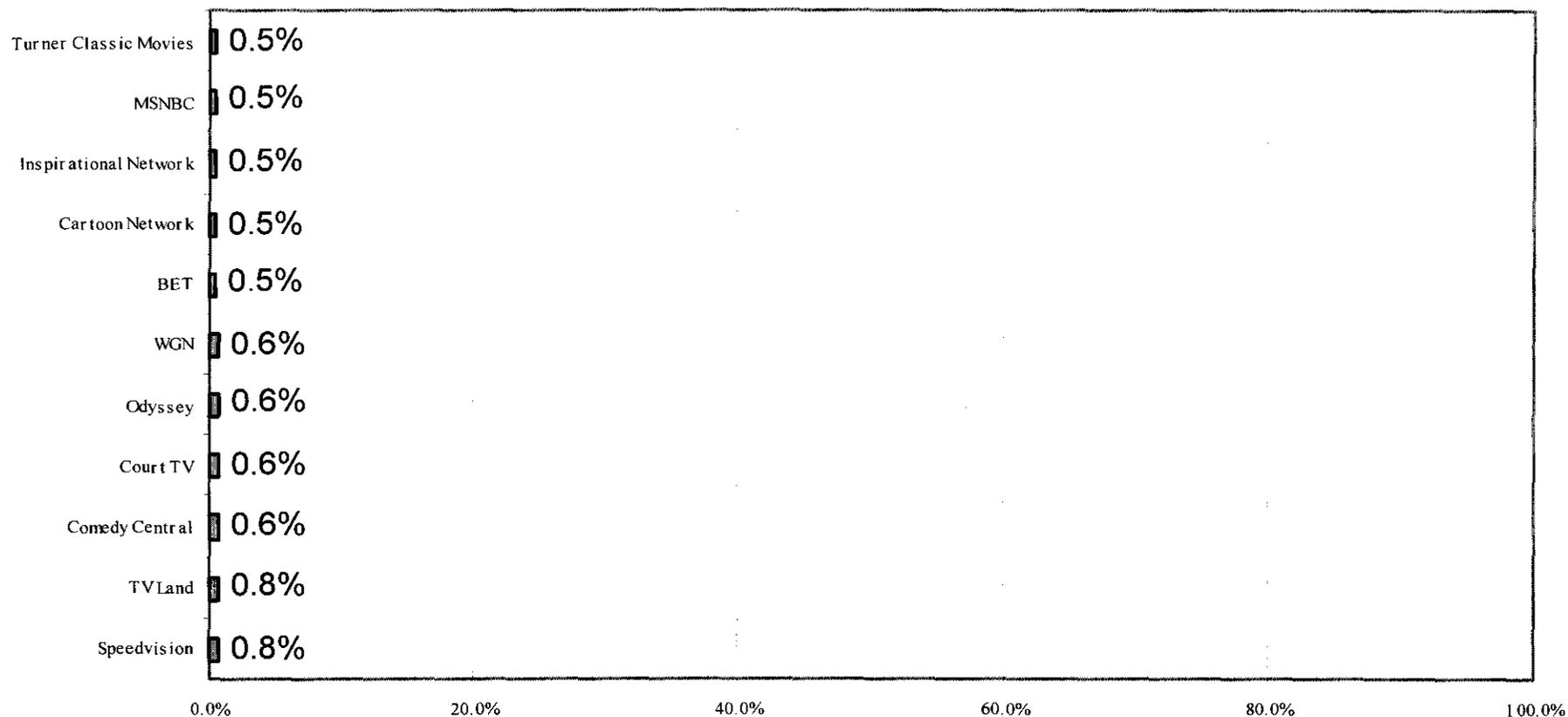


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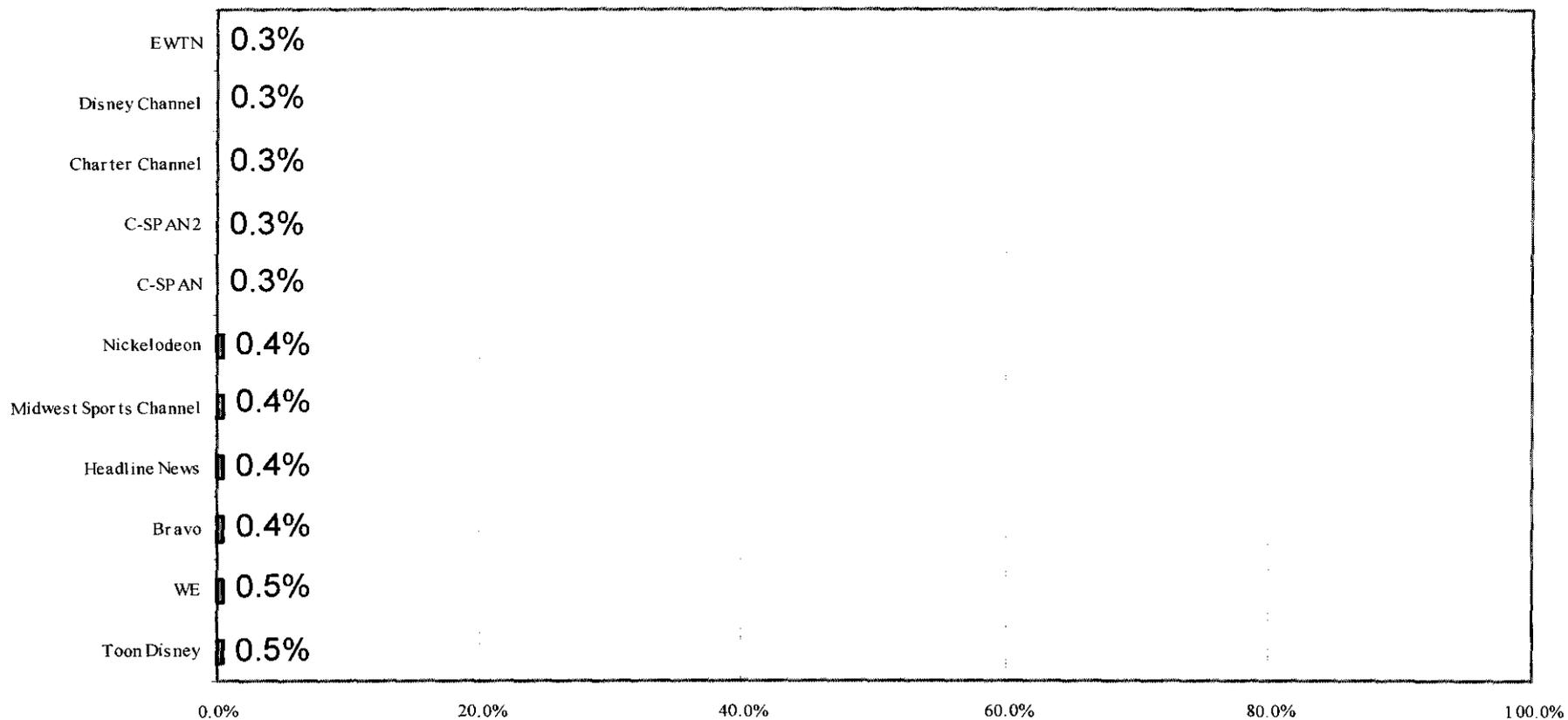


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**The Gazette** Janesville

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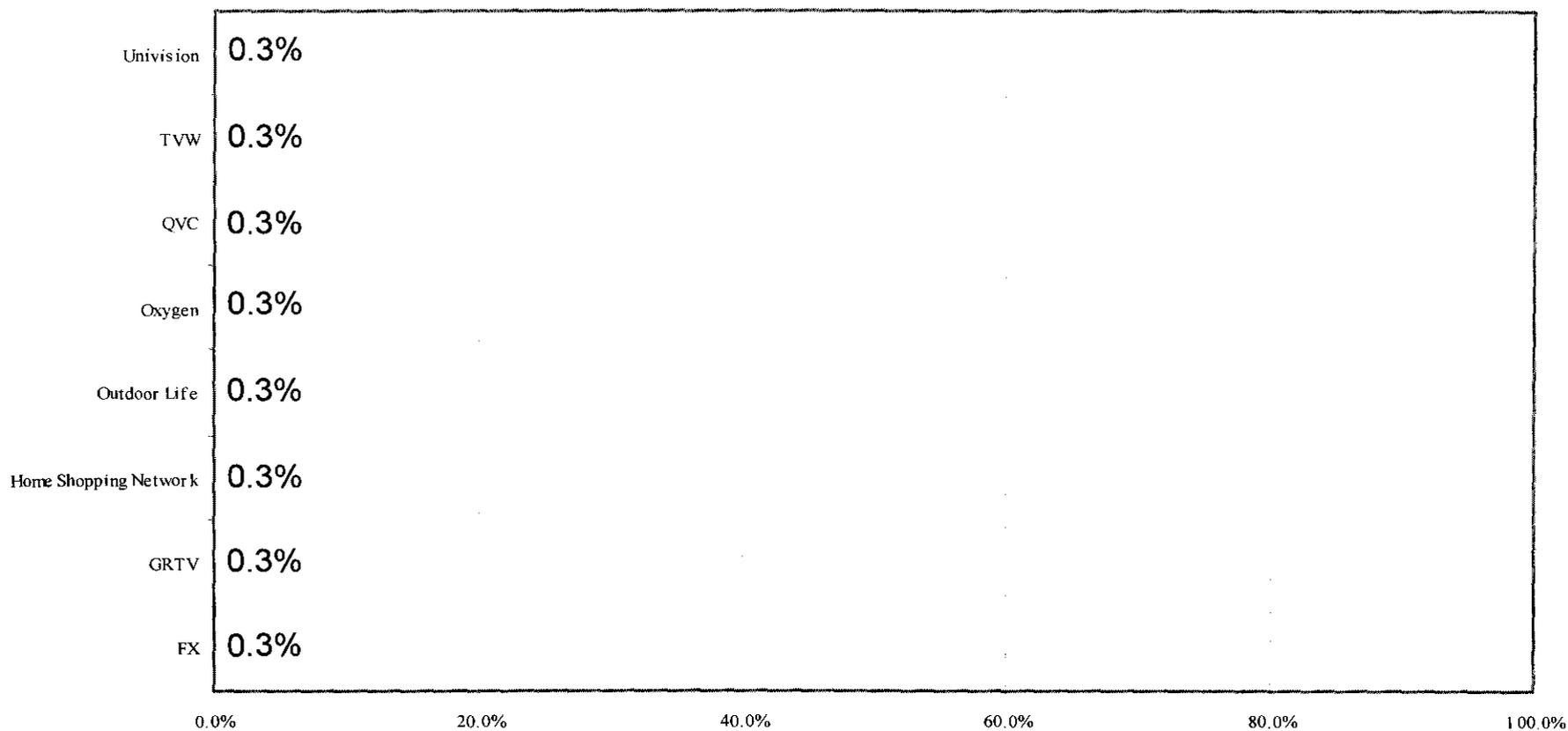


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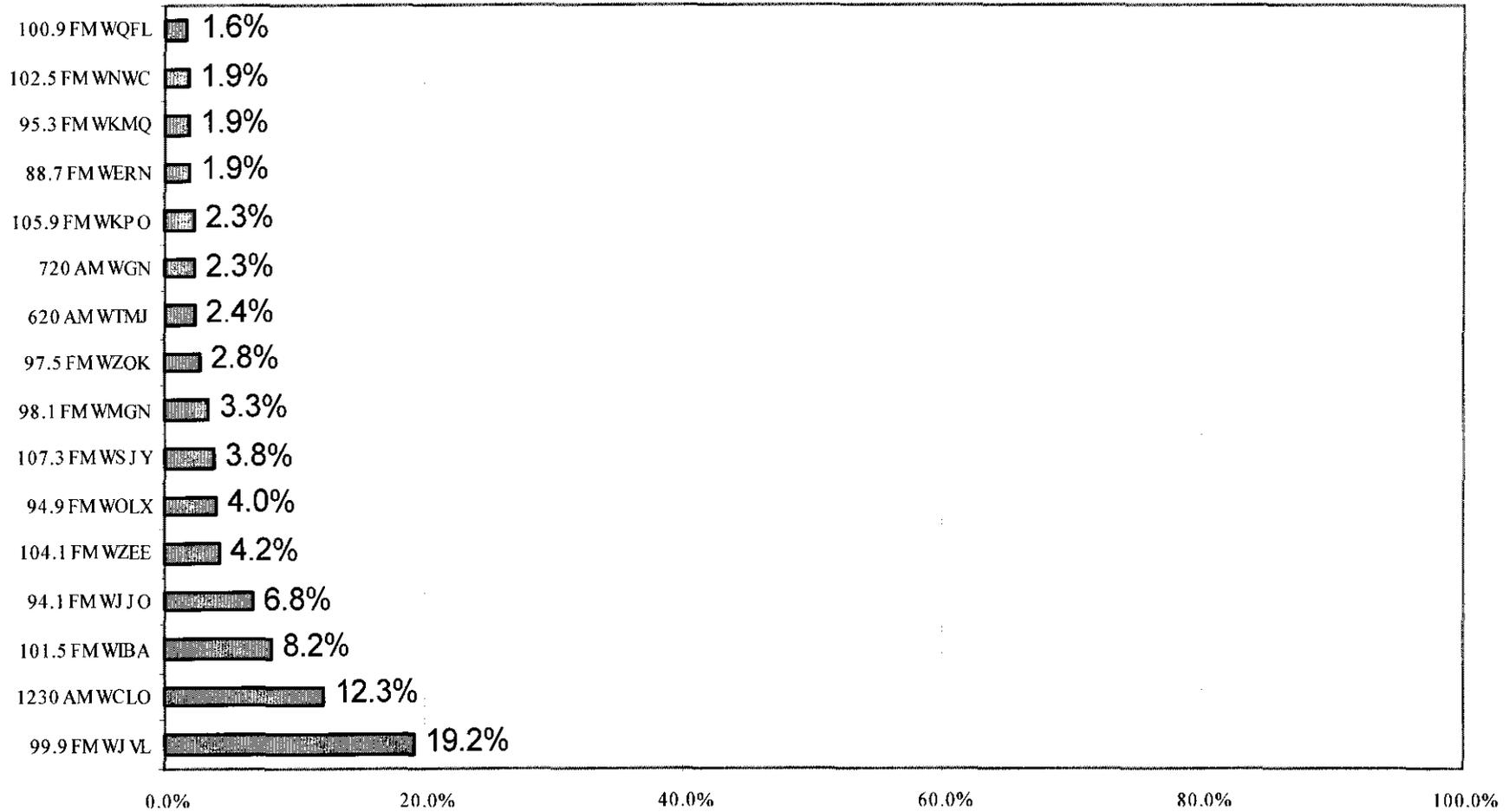
Slide 7 of 7



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Question: Did you watch any television yesterday during 7 p.m. and 11 p.m.?

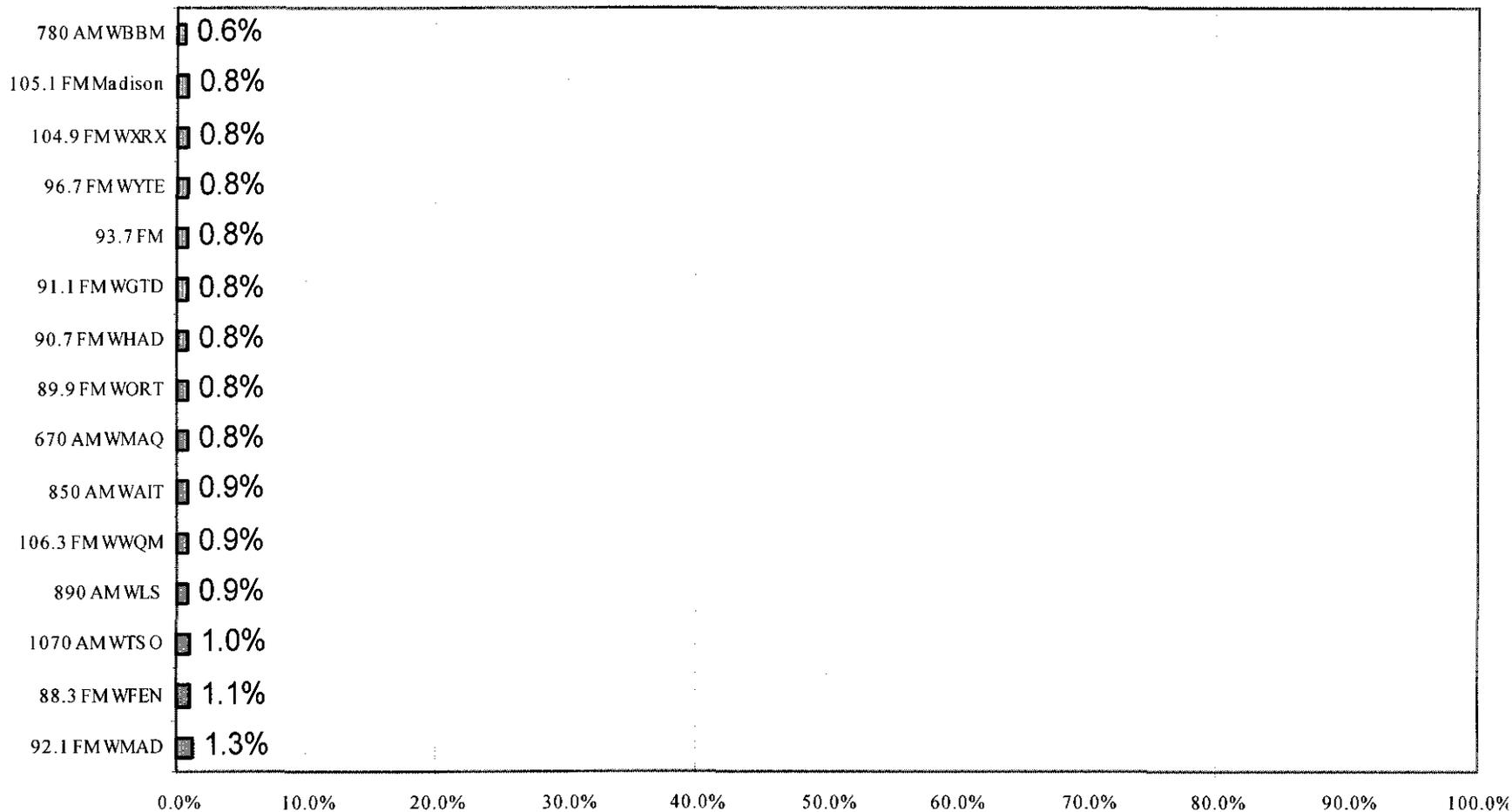
**The Gazette** Janesville

# Yesterday Radio Audience: 6 AM – 10 AM Page 1 of 3



Source: Minnesota Opinion Research Incorporated; 2001 Market Study  
 Base: Total adults in Rock County excluding Beloit = 79,500  
 Question: Which radio stations were you listening to yesterday between 6 and 10 a.m.

## Yesterday Radio Audience: 6 AM – 10 AM Page 2 of 3



Source: Minnesota Opinion Research Incorporated; 2001 Market Study  
Base: Total adults in Rock County excluding Beloit = 79,500  
Question: Which radio stations were you listening to yesterday between 6 and 10 a.m.

## Yesterday Radio Audience: 6 AM – 10 AM Page 3 of 3

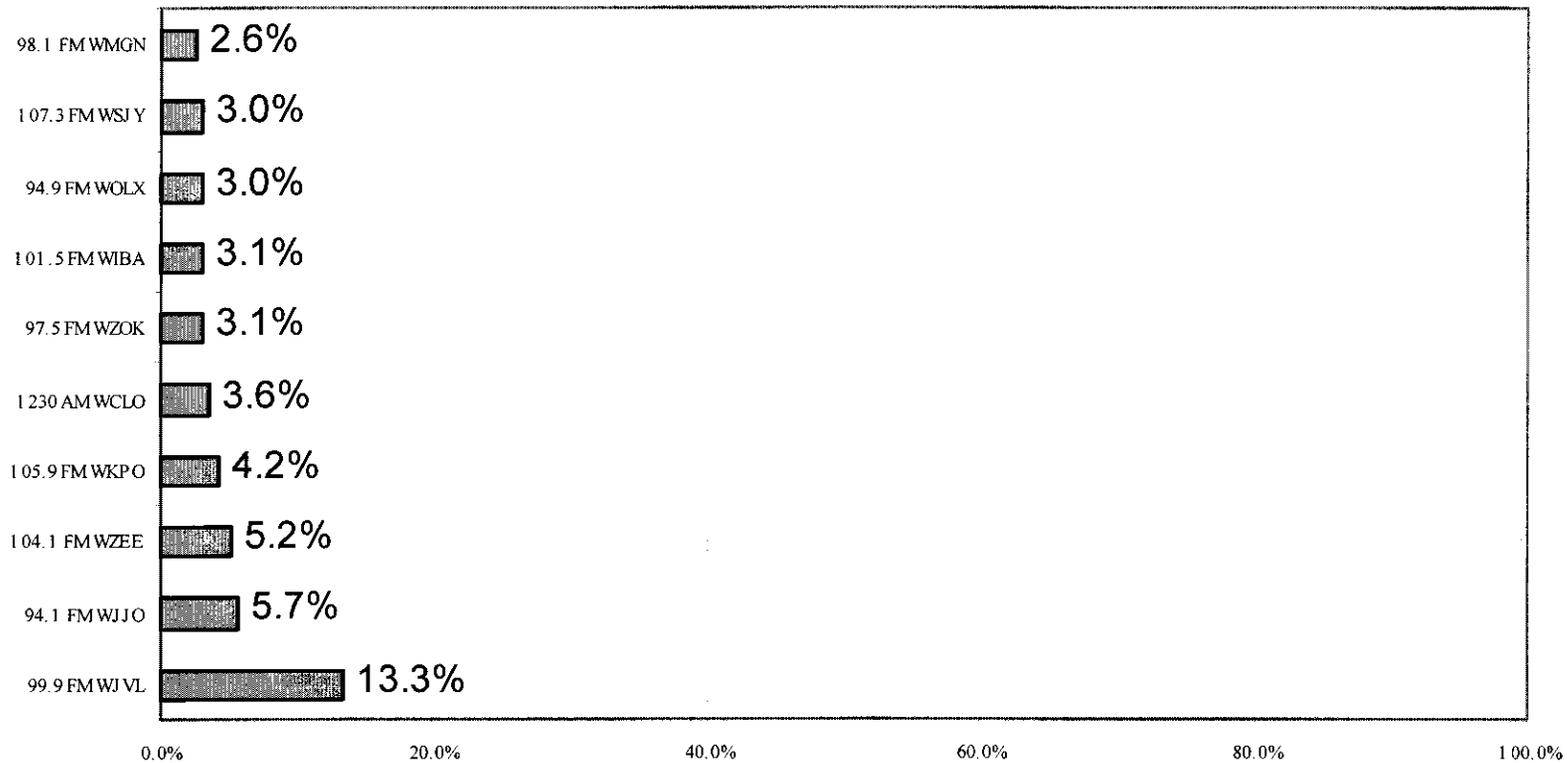
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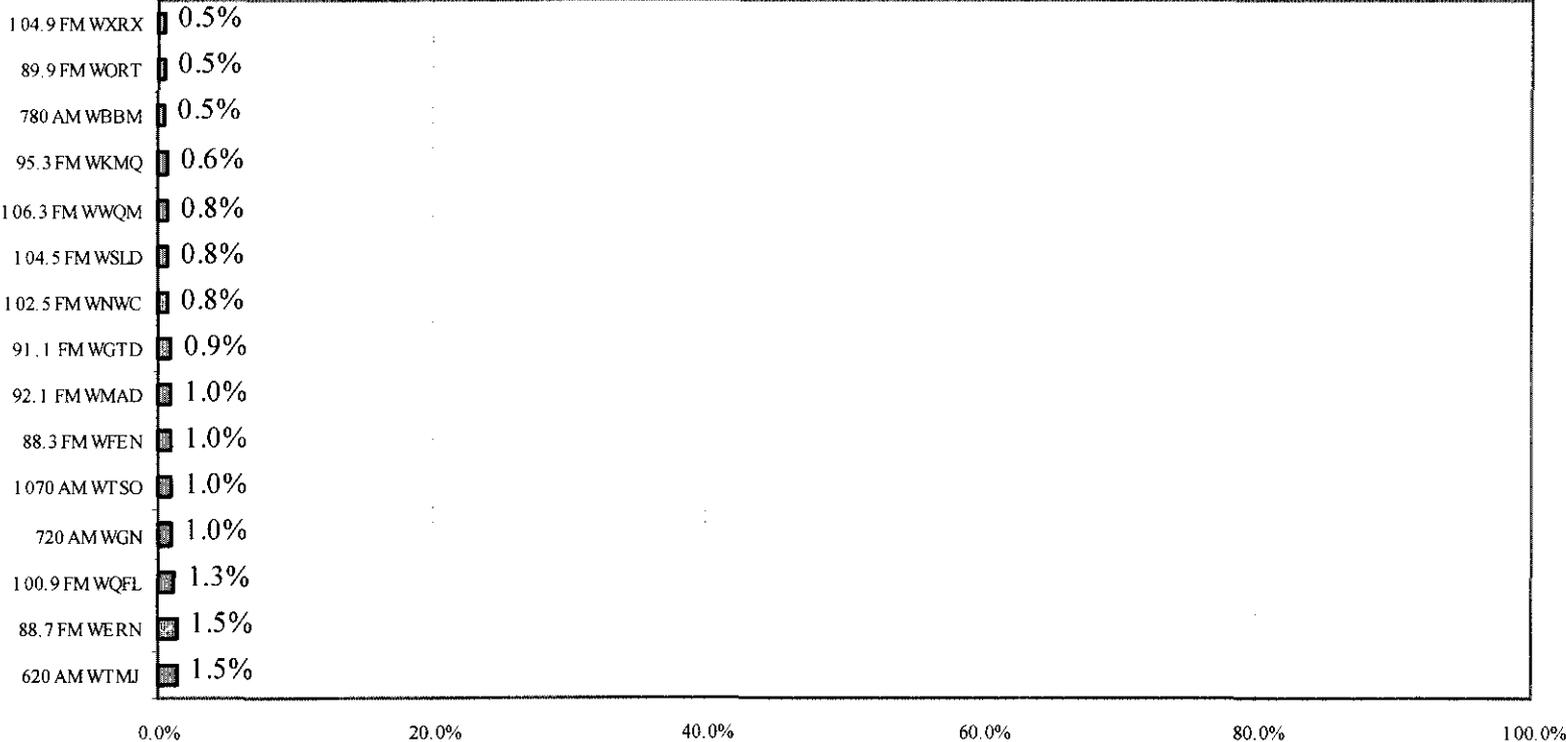
# Yesterday Radio Audience: 3 PM – 7 PM Page 1 of 3

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Source: Minnesota Opinion Research Incorporated; 2001 Market Study  
Base: Total adults in Rock County excluding Beloit = 79,500  
Question: Which radio stations were you listening to yesterday between 3 and 7 p.m.

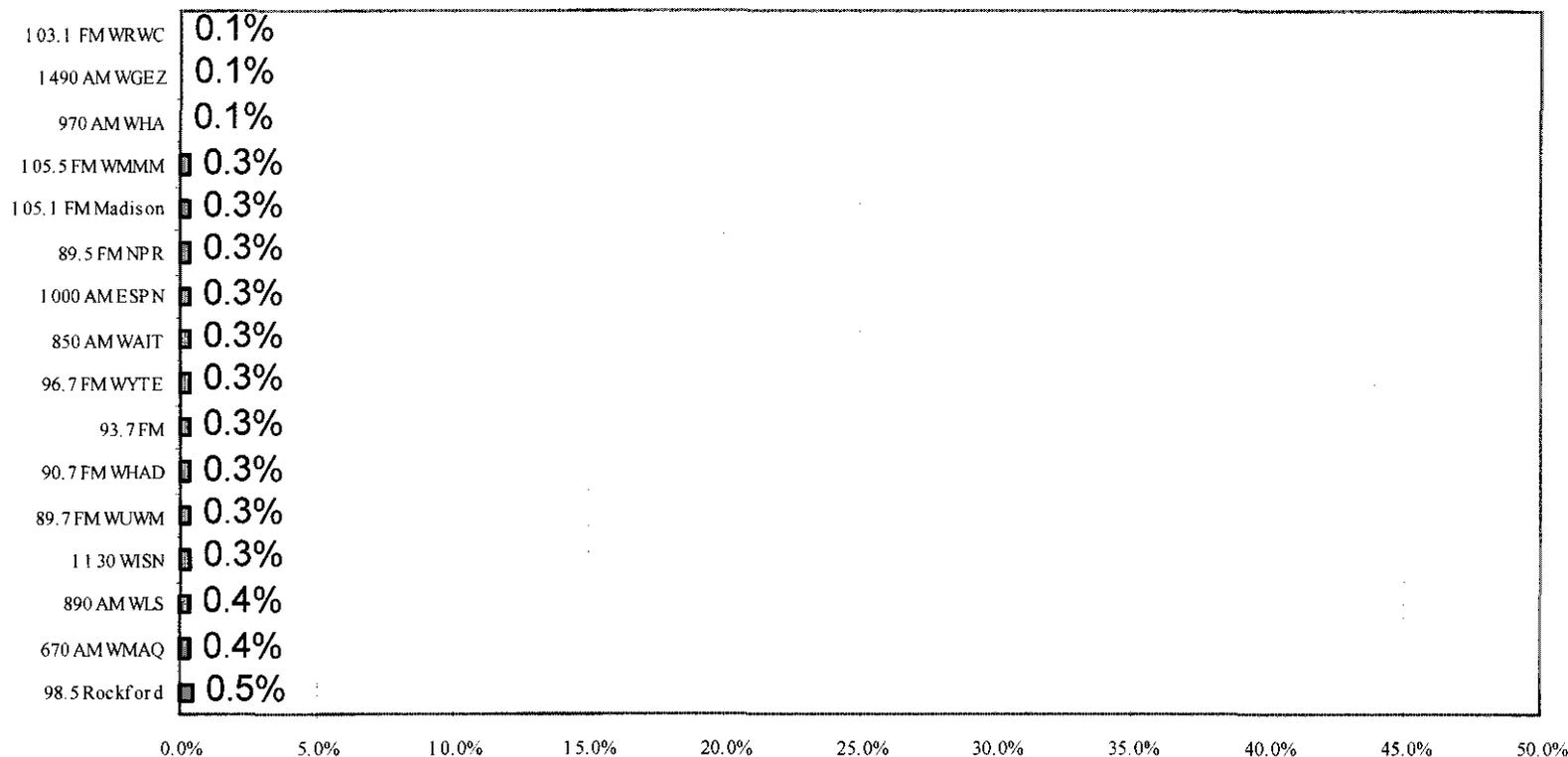
# Yesterday Radio Audience: 3 PM – 7 PM Page 2 of 3



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# Yesterday Radio Audience: 3 PM – 7 PM Page 3 of 3

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