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October 24, 2002

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Marlene Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
12<sup>th</sup> Street Lobby, TW-A325  
Washington, DC 20554

Re: Notice of Permitted Ex Parte Presentation  
MB Docket 02-277, MB Dockets 01-235, 01-317, 00-244;  
and MB Docket 02-230, CS Docket No. 98-120

Dear Ms. Dortch:

On behalf of Belo Corp., Dallas, Texas ("Belo"), and pursuant to Section 1.1206(b)(2) of the Commission's rules, we submit this notice regarding a permitted oral ex parte presentation concerning the above-referenced rulemaking proceedings.

On October 23, 2002, executives from Belo met with Kenneth Ferree, Robert Ratcliffe, Deborah Klein, William Johnson, Richard Chessen, Barbara Kreisman, Mania Baghdadi, Judith Herman and Paul Gallant. Representing Belo were Guy H. Kerr, Senior Vice President/General Counsel and Secretary; Regina Sullivan, Vice President/Government and Public Affairs; and Michael J. McCarthy, Partner, Wiley, Rein and Fielding.

At the meeting, Belo representatives discussed the above-referenced rule making proceedings making the following points: With respect to the Commission's Broadcast Ownership rulemaking, Belo is of the view that the emphasis on viewpoint diversity has no relevance, from a policymaking perspective, to the over-the-air television business as it is now operated. Marketplace incentives dictate that news reporting be fair and balanced and provide the viewer with comprehensive coverage of local matters. A successful, competitive news program will not have a viewpoint, in the sense of the "diverse and antagonistic" television local news reporting the Commission is describing in its rule making. Viewers today do not look to their TV local news for editorial viewpoints. Belo advised the FCC representatives that it would develop this key point in its comments to the Ownership proceeding.

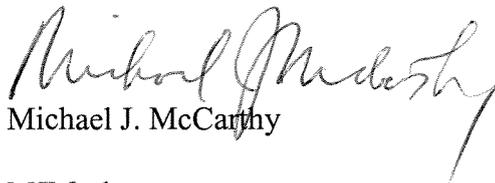
As for the Commission's digital television transition proceedings, Belo noted that the direction that congressional and Commission policymakers appear to be going is

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to a date certain to end the transition, rather than the current "85% test" deadline to the transition. Belo is interested in an accelerated end to the digital transition, but if a date is set, than the policymakers' emphasis must be on ensuring that, during the transition, digital television licensees obtain (1) cable carriage of both analog and digital signals, (2) cable carriage of both high definition as well as standard definition (multicast) and PSIP transmissions, (3) a prohibition on any signal degradation by cable television providers, and (4) implementation of the broadcast flag copyright protections. Belo noted that all of these requirements, in varying degrees, are opposed by cable or consumer electronics interests. Thus, consideration should also be given to putting a "safety net" in place at the end of the transition: Use a portion of the spectrum auction proceeds to fund a tax credit or other fiscal incentive for any consumer electronics manufacturer which provides inexpensive analog-to-digital converters to American viewers. In this way, the digital transition could be completed without disenfranchising American viewers.

If any questions arise concerning the above, please contact the undersigned.

Very truly yours,



Michael J. McCarthy

MJM:vl

cc (via email): Kenneth Ferree  
Robert Ratcliffe  
Deborah Klein  
William Johnson  
Richard Chesson  
Barbara Kreisman  
Mania Baghdadi  
Judith Herman  
Paul Gallant