

# BELO

Robert W. Decherd  
*Chairman of the Board  
President and Chief Executive Officer*

March 12, 2003

The Hon. Kevin Martin  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: 2002 Biennial Regulatory Review –  
Review of the Commission's Broadcast Ownership Rules  
(MB Docket No. 02-277), Written Ex Parte Communication

Dear Commissioner Martin:

Thank you very much for meeting with the Belo team during our recent trip to Washington. Given the long day you had at the Telecommunications Subcommittee hearing, we were particularly grateful for the time you and your staff gave us. We appreciate the opportunity to discuss the ongoing multiple ownership proceeding and the digital television transition.

As discussed, we believe the competitive nature of the current marketplace and the overwhelming evidence demonstrated in the filings made in the ownership proceeding support elimination of the newspaper/broadcast cross-ownership rule and relaxation of the duopoly restrictions. As you consider alternative approaches, we urge you to be wary of solutions that involve complicated mathematical formulae which are difficult to understand, enforce and apply in an ever-changing media market.

We know that you and your fellow Commissioners are tackling these issues in earnest, and hope you will not hesitate to let us know if we can provide additional information or insights that might be helpful in your deliberations.

Sincerely,



cc: Marlene H. Dortch/via electronic filing