



Federal Communications Commission
Washington, D.C. 20554

September 22, 2005

DOCKET FILE COPY ORIGINAL

M. Anne Swanson, Esq.
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036-6802

Re: Motion to Accept Filing as Timely
Filed in MB Docket No. 05-255

Dear Ms. Swanson:

The Office of the Secretary has received your request for acceptance of the document filed by Dow, Lohnes & Albertson, PLLC on behalf of Media General in the above-referenced proceeding as timely filed, due to technical difficulties with the Commission's Electronic Comment Filing System.

In accordance with 47 C.F.R. Section 0.231(i), I have reviewed your request and verified your assertions. After considering the relevant arguments, I have determined that these filings will be accepted as timely filed on September 19, 2005. If we can be of further assistance, please contact the Office of the Secretary.

Sincerely,

A handwritten signature in cursive script that reads "Marlene H. Dortch".

Marlene H. Dortch
Secretary

cc: Media Bureau

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September 20, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

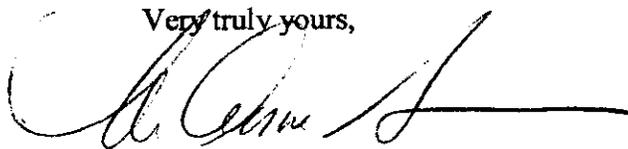
Re: Request for Acceptance of Timely Filed Comments
MB Docket No. 05-255

Dear Ms. Dortch:

At the request of the Office of the FCC Secretary, we are resubmitting the enclosed comments that we attempted to file repeatedly yesterday in a timely fashion. We have been informed by the Secretary's Office that resubmission is required because the FCC's Electronic Comment Filing System ("ECFS") was not functioning properly from approximately 6:30 p.m. yesterday until 7:30 a.m. today. (See enclosed email documenting attempts to file.)

Please let me know if you have any questions about this submission.

Very truly yours,



M. Anne Swanson

Enclosures

cc(w/encl.): Mr. Timothy May (by email)
George L. Mahoney, Esquire (by regular mail)

RECEIVED

SEP 20 2005

Federal Communications Commission
Office of the Secretary

Foxwell, Tammi

From: Foxwell, Tammi
Sent: Monday, September 19, 2005 8:33 PM
To: 'Marlene.Dortch@fcc.gov'; 'William.Caton@fcc.gov'
Cc: 'Donna.Gregg@fcc.gov'; 'MaryBeth.Murphy@fcc.gov'; Swanson, M. Anne
Subject: Repeated Attempts to File Video Competition Comments via ECFS (MB Dkt. No. 05-255)
Attachments: Video Competition Comments.pdf

On behalf of Anne Swanson, beginning at approximately 6:30 pm this evening I began my first of several attempts to file electronically the attached Comments via ECFS. Each time I selected the "Finish Transaction and Receive Confirmation" button, the uploading of the document stopped mid-stream, and ECFS produced a blank page instead of a confirmation receipt page. Therefore, I was unable to confirm delivery of the document via ECFS. If my attempts to upload the document were not successful, please accept the attached copy in lieu thereof. If you have any questions concerning this request, please call Anne Swanson or me. Thank you for your assistance.

Tammi A. Foxwell
Secretary to M. Anne Swanson
Dow Lohnes & Albertson PLLC
1200 New Hampshire Avenue, NW
Washington, DC 20036-6802
202-776- (P)
202-776- (F)

This message from the law firm of Dow, Lohnes & Albertson, PLLC, may contain confidential or privileged information. If you received this transmission in error, please call us immediately at (202)776-2000 or contact us by E-mail at admin@dialaw.com. Disclosure or use of any part of this message by persons other than the intended recipient is prohibited.

9/20/2005

RECEIVED
SEP 19 2005
Federal Communications Commission
Office of the Secretary

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

In the matter of)
)
Annual Assessment of the Status of)
Competition in the Market for the) MB Docket No. 05-255
Delivery of Video Programming)

COMMENTS

Media General, Inc. ("Media General"), by its attorneys, hereby files these comments in response to the *Notice of Inquiry* ("*Notice*") in the above-referenced proceeding, which seeks comment on a wide-ranging series of topics related to the delivery of video programming.¹ A key factor affecting the production and availability of locally originated programming, especially news, is the inability of daily newspaper publishers to hold broadcast licenses for stations operating in the areas where they publish. Because of the newspaper/broadcast cross-ownership ("NBCO") rule,² an anachronistic barrier to entry which was adopted over three decades ago, long before the explosive growth in media outlets at the end of the last century, many viewers, particularly those in smaller communities, are denied the benefit of the greater quantity and higher quality of news that the Commission and numerous parties have documented is delivered by newspaper-owned television stations. Any report that the FCC delivers to Congress as a result of this review should acknowledge the greater quantity and higher quality of local news

¹ *Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming, Notice of Inquiry*, MB Dkt. No. 05-255, FCC 05-155, released August 12, 2005. Among the topics raised in the *Notice* are "barriers to entry in the market for the delivery of video programming" (§ 10), "factors affecting the production and availability of locally-originated programming" (§ 14), and "competition issues specific to video programming distribution in rural and smaller markets" (§ 23). These comments will address those issues.

² 47 C.F.R. § 73.3555(d) (2002).

and non-entertainment programming delivered by newspaper-owned television stations, and the barrier to competition represented by the NBCO.

Media General is an independent, publicly owned communications company situated primarily in the Southeast with interests in newspapers, television stations, interactive media, and diversified information services. Its corporate mission is to be a leading provider of high-quality news, information and entertainment in the Southeast by continually building on its position of strength in strategically located markets. Media General is the licensee of 26 television stations, principally small- to medium-sized markets.

Media General is one of the media industry's leading practitioners of "convergence," the melding of newspaper, television, and on-line resources in the gathering and dissemination of local news. Its Tampa News Center is the most advanced convergence laboratory in the nation, and the only one where a newspaper, a television, and an on-line division are located together under one roof. Further convergence efforts currently are underway in five additional Media General markets, and other collaborative efforts are being initiated in all Media General markets.

Through its convergence efforts, Media General has been able to deliver better, faster, and deeper local news reporting. Its reporters have been able to cover stories from additional and more varied angles. They have been able to work together to ensure that fast-breaking stories reach residents as soon as possible and, at other times, to prepare in-depth investigatory pieces that require varied sources and a wide range of expertise to produce.³ In Tampa, in

³ For a description of examples of similar results at cross-owned properties held by other parties, see *2002 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, Report and Order and Notice of Proposed Rulemaking*, MB Dkt. No. 02-277 *et al.* ("July 2003 Report and Order"), 18 FCC Rcd 13620, 13757 (2003), *aff'd in part and rev'd in part*, *Prometheus Radio Project v. FCC*, 373 F.3d 372 (3d Cir. 2004), *cert. denied*, 2005 U.S. LEXIS 4807 (U.S. June 13, 2005).

particular, convergence has allowed the Media General properties to put more reporters and photographers on the streets and in the community; increase the overall and core circulation of *The Tampa Tribune*; continue to deliver news programming that achieves superlative ratings and numerous awards for quality; and maintain the same number of newscasts while adding a whole hour of locally produced entertainment programming in late morning. In Media General's smaller convergence markets, it has had similar success in increasing coverage of local news and events and delivered a greater quantity of news programming to the community.

At least five studies spread over the last three decades repeatedly and consistently have demonstrated that these benefits are not unique to Media General's convergence markets. They have shown that television stations jointly owned with newspapers are likely to broadcast significantly more news and informational programming of higher quality than other stations in the same market.

The first of these studies was conducted by the FCC staff itself and undertaken in 1973 as part of the proceeding that led to adoption of the NBCO ban. The study, which was based on TV Station Annual Programming Reports, found that, on average, television stations owned by newspapers offered six percent more local news, nine percent more local non-entertainment programming, and 12 percent more total local programming than other television stations.⁴ The FCC described these results as presenting "an undramatic but nonetheless statistically significant superiority in newspaper owned television stations in a number of program particulars."⁵

⁴ *Amendment of Sections 74.34 [sic], 73.240, and 73.636 of the Commission's Rules Relating to Multiple Ownership of Standard, FM, and Television Broadcast Stations, Second Report and Order*, Dkt. No. 18110, 50 FCC 2d 1046, 1078 n.26 & Appendix C.

⁵ *Id.* at 1078 n.26.

A second study, undertaken by A.H. Belo Corporation and submitted in connection with its comments in the Commission's 1998 Biennial Regulatory Review, echoed these results.⁶ Among the stations included in the study was WFAA-TV, Dallas-Ft. Worth, Texas, where Belo jointly owns *The Dallas Morning News*. As the study showed, WFAA-TV aired over 60 hours a 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.⁷ This total placed WFAA-TV appreciably ahead of the other network affiliates in its market in terms of average hours of non-entertainment programming aired in a week and placed WFAA-TV second among all 17 Belo stations included in the study, a second place showing that was so close that it could be disputed as statistically insignificant, particularly since different calendar weeks were used to measure the broadcasts of the various Belo stations.⁸

In a third, more recent study commissioned by Media General, media expert Dr. S. Robert Lichter, co-founder of the Center for Media and Public Affairs, found that common ownership has a positive effect on the overall amount of non-entertainment programming

⁶ Appendix A, "Non-Entertainment Programming Study," Comments of A.H. Belo Corporation, MM Dkt. No. 98-35 (July 21, 1998).

⁷ *Id.* WFAA-TV specifically broadcast 81.5 hours total of non-entertainment programming, 61.94 hours when discounted for commercials. Its weekly total as a percentage of all programming was 48.5 percent, 36.9 percent when discounted for commercials. These percentages were much higher than the 42.1 percent, 32.0 percent when discounted for commercials, broadcast on average by other stations in the Dallas-Ft. Worth market.

⁸ KTVB, Boise, Idaho, aired more non-entertainment programming than WFAA-TV, and its percentages were only slightly higher than WFAA-TV's -- 83.5 percent of total programming was non-entertainment, 63.46 when discounted for commercials. It should be noted that different "news weeks" were used for the two stations, and the slight difference may be explainable on that basis.

broadcast in a market.⁹ In his study, Dr. Lichter paired each Media General convergence DMA with the immediately higher-ranked DMA in population size. None of the higher-ranked DMAs included a commonly owned television station and newspaper. For each market, Dr. Lichter coded and categorized program listings using the same six categories utilized in the Belo study, including one additional category for agricultural programming. Dr. Lichter then calculated the number of hours of non-entertainment programming presented both in total and on average by the four network affiliated stations in the Media General markets and in the next adjacent, immediately higher-ranked DMAs.¹⁰ Comparing these averages, he found significant results that produced a consistent pattern. In five out of six of the comparisons between DMAs with newspaper-owned television stations and DMAs without such stations, the stations in the convergence DMAs offered appreciably more non-entertainment programming on average than the stations in the non-convergence markets. The differences ranged from a low of one percent greater in the comparison of convergence market Columbus, Georgia, and non-convergence market Yakima, Washington, to as high as 15 percent between convergence market Tri-Cities, Tennessee/Virginia, and non-convergence market Davenport, Iowa. Only in the Roanoke, Virginia DMA did the station commonly owned with a newspaper offer less non-entertainment programming than the stations in the non-convergence market of Lexington.¹¹

As a fourth study commissioned by the FCC itself has shown, “[n]ot only do newspaper-owned stations provide more news and public affairs programming, they also appear to provide

⁹ Samuel Robert Lichter, Ph.D., “Review of the Increases in Non-Entertainment Programming Provided in Markets with Newspaper-Owned Television Stations,” Appendix 5 (“Lichter Study”), Comments of Media General, Inc., MM Dkt. No. 01-235, *et al.* (December 3, 2001).

¹⁰ *Id.* at 3.

¹¹ *Id.* at 4 and Table 1.

higher-quality programming, on average, at least as measured by ratings and industry awards.”¹²

This study found that, while non-network owned but network-affiliated stations provide, on average, 14.9 hours per week of local news and public affairs programming, *newspaper-owned* affiliated stations provide almost 50 percent more such programming, averaging 21.9 hours per week.¹³ In addition, the study found that the average number of hours of local news and public affairs programming provided by the same-market cross-owned television-newspaper combinations was 25.6 hours per week, compared to 16.3 hours per week for the sample of television stations owned by a newspaper that is not in the same market as the station.¹⁴ The ratings for newspaper-owned stations’ 5:30 and 6:00 p.m. newscasts during the sweeps period studied in the report averaged an 8 rating compared to an average rating of 6.2 for non-newspaper affiliated stations.¹⁵ The newspaper-owned stations also received a “dramatically” greater number of awards from various gold-standard media review bodies.¹⁶

A fifth review, cited by the FCC in the *July 2003 Report and Order*, similarly found higher news quality among newspaper-owned television stations. The study prepared by the Project for Excellence in Journalism (“PEJ”) analyzed five years of data on ownership and news quality. Based on this review, PEJ concluded that cross-owned stations in the same Nielsen Designated Market were more than twice as likely to receive an “A” grade than were other

¹² *July 2003 Report and Order* at 13754-55.

¹³ *Id.* at 13754, citing MOWG Study No. 7, *The Measurement of Local Television News and Public Affairs Programs*, by Thomas C. Spavins, Loretta Denison, Jane Frenette, and Scott Roberts (Sept. 2002).

¹⁴ *Id.*

¹⁵ *Id.* at 13755.

¹⁶ “More dramatically, newspaper-owned stations received 319 percent of the national average per station Radio and Television News Directors Association (“RTNDA”) awards, and 200 percent of the national average A.I. DuPont Awards (in association with the School of Journalism of Columbia University) in 2000-2001. During that same period non-newspaper-owned stations received RTNDA Awards at a rate of only 22 percent of the national average. They received DuPont Awards at a rate of 39 percent of the national average per station.” *Id.*

stations. As the FCC concluded in reviewing the study, “[o]n the whole, cross-owned stations were more likely to do stories focusing on important community issues and to provide a wide mix of opinions, and they were less likely to do celebrity and human-interest features.”¹⁷

Many of these reviews also demonstrate that, no matter what the time period under review, market size has no effect on the conclusions and that defensible relief will come only with across-the-board, nationwide repeal of the NBCO rule. For instance, in the study by Dr. Lichter measuring non-entertainment programming, stations in the three smallest Media General convergence markets still aired more non-entertainment programming than stations in the immediately higher-ranked DMAs.¹⁸ The programming study that the FCC staff itself undertook much earlier in 1973 included stations from variously sized markets. As it noted, stations in the seven largest markets were specifically excluded from the study, which found that, on average, television stations owned by newspapers offered more news, non-entertainment, and overall local programming than other television stations.¹⁹ Market size does not make a difference in the greater quantity and higher quality of news programming produced and delivered by newspaper-owned stations.

As the FCC has consistently found 30 years later, “newspaper-broadcast combinations may produce tangible public interest benefits in smaller markets in particular.”²⁰ As support, it approvingly cited the contention of a West Virginia group owner that “the cross-ownership restriction impairs coverage of local news and public affairs in small markets by prohibiting combinations that would produce efficiencies and synergies particularly necessary in smaller

¹⁷ *Id.* at 13755. Because the study’s methodology came under attack in its conclusions regarding network-owned media properties, the FCC emphasized that it did not view its conclusions “as a statistical study” but still worthy of note as “anecdotal evidence.” *Id.* at 13755 n.766.

¹⁸ Lichter Study, Table 1.

¹⁹ Appendix C, *Second Report and Order*, 50 FCC 2d at 1095 n.4.

²⁰ *July 2003 Report and Order*, 18 FCC Rcd at 13757.

markets” as well as its comment that the restriction “may have the unintended effect of stifling local news by prohibiting efficient combinations that would produce better output.”²¹ The FCC noted that it “assume[d] that the efficiencies cited by [this West Virginia company] can benefit small businesses with respect to the publication of news and public affairs programming.”²²

In short, as the FCC has found, the NBCO rule “actually works to inhibit” local news and information programming.²³ Local news is extremely expensive to produce. Television stations, particularly in smaller markets, are facing the elimination of network compensation at the same time that they are encountering the staggering costs of converting to digital broadcast transmission. The impact of these changes has been greatest in smaller markets. In the last few years, scores of local television newscasts have been cancelled or curtailed.²⁴

Elimination of newspaper/broadcast cross-ownership restrictions will allow newspapers to strengthen and reinvigorate local television news operations and improve the quality and breadth of news. In the end, convergence strengthens local media outlets vis-à-vis larger media conglomerates which deliver a national and undifferentiated news product across all markets.

²¹ *Id.*

²² *Id.*

²³ *Id.* at 13753.

²⁴ See Attachment 1, “Selected Press Accounts of Curtailments in Local Television Newscasts -- November 1998 Through January 2003.”

At a minimum in this proceeding, the FCC must acknowledge and include in any report to Congress the benefits to local news and non-entertainment programming provided by newspaper-owned television stations. Only with inclusion of such information will the FCC accurately portray the status of competition in the market for the delivery of video programming.

Respectfully submitted,

MEDIA GENERAL, INC.

By: 

John R. Feore, Jr.

M. Anne Swanson

of

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September 19, 2005

ATTACHMENT 1
SELECTED PRESS ACCOUNTS OF CURTAILMENTS IN LOCAL TELEVISION NEWSCASTS
NOVEMBER 1998 THROUGH JANUARY 2003

| Market | Station | Decision | Source |
|-----------------|------------------|---|---------------|
| Anchorage, AK | KTVA (CBS) | Announced in April 2000 that it would eliminate noon newscasts. | 11 |
| Austin, TX | KEYE-TV (CBS) | Cancelled noon newscast in December 2002 and replaced it with game show. | 36 |
| Binghamton, NY | WIVT (ABC) | Cancelled locally produced morning news show in June 2002, and replaced it with regionally produced morning news show. | 34 |
| Boston, MA | WSBK (UPN) | Cancelled early evening newscasts in 1998, leaving only a 10 p.m. newscast, which is rebroadcast from WBZ-TV (CBS). | 2 |
| Boston, MA | WMUR-TV (ABC) | Cancelled 9 a.m. and 4 p.m. newscasts in May 2001. | 19 |
| Charlotte, NC | WBTV (CBS) | Cancelled 6:30 p.m. newscast in September 2001. | 22 |
| Chattanooga, TN | WDSI (Fox) | Cancelled morning and noon newscasts and added 4 p.m. newscast in January 2001. | 15 |
| Chattanooga, TN | WTVC-TV (ABC) | Cancelled weekend morning newscasts in February 2001. | 16 |
| Chicago, IL | WBBM-TV (CBS) | Cancelled one hour 6 p.m. newscast in early 1999. Replaced it with a half hour 4:30 p.m. newscast, which thereafter was cancelled in July 2000. | 3, 8 |
| Cleveland, OH | WUAB (IND) | Cancelled 11:30 a.m. newscast in January 1999. | 4 |
| Cleveland, OH | WEWS (ABC) | Cancelled 5 a.m. newscast in June 1999. | 6 |
| Detroit, MI | WKBD (UPN) | Cancelled local 10 p.m. newscast in November 2002 and replaced with one produced by other station in market. | 35 |
| Detroit, MI | WWJ-TV (CBS) | Cancelled 11 p.m. half hour local newscast in November 2002. | 35 |
| Duluth, MN | KDLH (CBS) | Cancelled noon newscast in November 1998. | 1 |
| Evansville, IN | WEVV (CBS) | Cancelled local newscasts in late 2001 | 29 |
| Green Bay, WI | WLUK-TV (Fox) | Cancelled 10 p.m. newscast in March 2001. | 17 |
| Greensboro, NC | WXLV-TV | Cancelled morning and weekend newscasts in late 2000. | 13 |

| Market | Station | Decision | Source |
|-------------------------------------|------------------------|---|--------|
| Greensboro/ Winston/Salem, NC | WXLV-TV (ABC) | Cancelled local newscasts in January 2002 | 27 |
| Hattiesburg, MS | WHLT-TV (CBS) | Cancelled all newscasts and eliminated news department in May 2001. | 18 |
| Jacksonville, FL | WJXX (ABC) | Cancelled all locally produced newscasts in January 2000 and began re-broadcasting newscasts from WTLV-TV (NBC). | 10 |
| Kingsport, TN | WKPT (ABC) | Announced in February 2002 that it would cancel locally produced weekday newscasts and brief updates and replace them with re-broadcast newscasts from WJHL-TV (CBS), Johnson City, TN. | 28 |
| Los Angeles, CA | KCBS (CBS) | Cancelled 4 p.m. newscast in 2001. | 21 |
| Los Angeles, CA | KCOP (UPN) | Announced in July 1999 that it would cancel 7:30 p.m. newscast. | 7 |
| Marquette, MI | WBUP WBKP (ABC) | Cancelled local newscast in March 2002 | 31 |
| Miami, FL | WAMI-TV (IND) | Cancelled only newscast and eliminated news department in December 2000. | 14 |
| Miami, FL | WTVJ (NBC) | In February 2002, cancelled midmorning newscast and added 4:00 p.m. newscast, which was subsequently cancelled. | 26 |
| Minneapolis, MN | KSTC-TV (IND) | Cancelled both weekday morning and 6:30 p.m. newscasts in October 2001. | 23 |
| Minneapolis, MN | KSTP (ABC) | Cancelled morning weekend newscasts in October 2001. | 23 |
| New York, NY | WCBS-TV | Cancelled 4:00 p.m. newscast in January 2002 | 25 |
| Odessa/ Midland, TX | KOSA-TV (CBS) | Cancelled morning newscasts in November 1998. | 1 |
| Orlando, FL | WESH (NBC) | Eliminated 4:30 p.m. newscast in April 2000. | 9 |
| Phoenix, AZ | KPHO-TV | Announced in December 2000 it would cancel 4:30 a.m. newscast. | 37 |
| Raleigh/ Durham, NC | WKFT (IND) | Cancelled hourly local news briefs in December 2002. | 32 |
| Sacramento, CA | KMAX-TV (UPN) | Cancelled evening newscast in 1998. | 2 |
| San Antonio, TX | KVDA-TV (Telemundo) | Cancelled morning newscast in July 2001. | 20 |
| Seattle, WA | KSTW(TV) (UPN) | Cancelled all newscasts and eliminated news department in December 1998. | 2 |

| Market | Station | Decision | Source |
|-----------------|-------------------|--|---------------|
| St. Louis, MO | KDNL-TV (ABC) | Cancelled all newscasts and eliminated news department in September 2001. | 24 |
| Tallahassee, FL | WTWC (NBC) | Cancelled all newscasts and eliminated news department in November 2000. | 24 |
| Tampa, FL | WTOG (UPN) | Cancelled 10 p.m. newscast and eliminated news department in 1998. | 5 |
| Topeka, KS | KTKA-TV (ABC) | Cancelled all four local newscasts in April 2002. | 33 |
| Twin Falls, ID | KMVT (CBS) | Announced in February 2002 that it would cancel 5:00 p.m. newscast | 30 |
| Utica, NY | WUTR(TV) (ABC) | Cancelled locally produced morning news show in June 2002, and replaced it with regionally produced morning news show. | 34 |
| Washington, DC | WUSA (CBS) | Cancelled 90 minutes of evening newscasts, added 9 a.m. newscast, in September 2000. | 12 |
| Watertown, NY | WWTI(TV) (IND) | Cancelled locally produced morning news show in June 2002, and replaced it with regionally produced morning news show. | 34 |

KEY TO SOURCES

| Source | News Article |
|--------|--|
| 1 | "Benedek Slashes Costs, Staffs," <i>Electronic Media</i> , Nov. 16, 1998 at 1; interview with station news staff, February 13, 2003. |
| 2 | Monica Collins, "Clickers of Sweeps and Cable Rates," <i>The Boston Herald</i> , Nov. 15, 1998 at 5. |
| 3 | Dan Trigoboff, "A Day of Rest. WGN Cancels Saturday Morning Newscast," <i>Broadcasting & Cable</i> , Dec. 21, 1998 at 28. |
| 4 | Roger Brown, "Poor Ratings Sink Channel 43 Midday Newscast," <i>The Plain Dealer</i> , Dec. 22, 1998 at 4E. |
| 5 | Eric Deggans, "WTTA Might Add Late-Night News," <i>St. Petersburg Times</i> , Mar. 18, 1999 at 2B. |
| 6 | Tom Feran, "Wenz Hires Sommers To Do Midday Show," <i>The Plain Dealer</i> , June 9, 1999 at 2E. |
| 7 | Cynthia Littleton, "KCOP Dropping Newscast," <i>Daily Variety</i> , July 12, 1999 at 5. |
| 8 | Phil Rosenthal, "More Bad News for Ch. 2," <i>Chicago Sun-Times</i> , Aug. 16, 2000, at 57. |
| 9 | "Chatter," <i>The Stuart News/Port St. Lucie News</i> , Apr. 16, 2000 at P6. |
| 10 | Eileen Davis Hudson, "Market Profile," <i>Mediaweek</i> , May 15, 2000; interview with station news staff, February 13, 2003. |
| 11 | "Inside Alaska Business," <i>Anchorage Daily News</i> , Apr. 20, 2000 at 1E. |
| 12 | "Local Media," <i>Mediaweek</i> , Oct. 2, 2000. |
| 13 | Jeremy Murphy, "Local Media—Los Angeles Radio Stations: ESPN Radio Picks Up Biggest Affiliate," <i>Mediaweek</i> , Nov. 27, 2000. |
| 14 | Dan Trigoboff, "Station Break," <i>Broadcasting & Cable</i> , Dec. 11, 2000 at 33. |
| 15 | Barry Courter, "Fox 61 Moves To Be First With News," <i>Chattanooga Times/Chattanooga Free Press</i> , Jan. 21, 2001 at B1. |
| 16 | Barry Courter, "Public Gives Locher A Boost," <i>Chattanooga Times/Chattanooga Free Press</i> , Feb. 9, 2001 at H5. |
| 17 | Tim Cuprisin, "Green Bay Fox Station Cancels 10 p.m. News," <i>Milwaukee Journal Sentinel</i> , Mar. 8, 2001 at 8B. |
| 18 | Kathryn S. Wenner, "News Blackout," <i>American Journalism Review</i> , May 2001, at 12. |
| 19 | Denis Paiste, "'Chronicle' Coming to WMUR," <i>The Union Leader (Manchester NH)</i> , May 30, 2001 at A2. |
| 20 | "News roundup," <i>San Antonio Express-News</i> , July 4, 2001 at 2B. |
| 21 | Dan Trigoboff, "Station Break," <i>Broadcasting & Cable</i> , Aug. 6, 2001 at 26. |
| 22 | Mark Washburn, "WBTV Replaces News Director to Boost Ratings," <i>The Charlotte Observer</i> , Aug. 14, 2001 at 1D. |
| 23 | Jeremy Murphy, "Local Media TV Stations," <i>Mediaweek</i> , Nov. 5, 2001; interview with station news staff, February 13, 2003. |
| 24 | Dan Trigoboff, "KDNL's St. Louis Blues; KDNL Television in St. Louis, Missouri, Axes News Department," <i>Broadcasting & Cable</i> , Oct. 8, 2001 at 22. |
| 25 | Chris Pursell, "Stations Scrambling to Slot New Strips," <i>Electronic Media</i> , Dec. 31, 2001 at 3. |

KEY TO SOURCES

| Source | News Article |
|--------|--|
| 26 | Tom Jicha, "WTVJ Shifts Newscasts to Late Afternoon," <i>Sun-Sentinel (Fort Lauderdale, FL)</i> , Feb. 6, 2002 at 3E; interview with station news staff, Feb. 11, 2003. |
| 27 | Dan Trigoboff, "Station Break," <i>Broadcasting & Cable</i> , Jan 7, 2002 at 40. |
| 28 | Dan Trigoboff, "Station Break," <i>Broadcasting & Cable</i> , Jan. 21, 2002 at 36; interview with station news staff, February 13, 2003. |
| 29 | Michael Schneider, "Local Newscasts Fall Victim to Cost Cuts," <i>Variety</i> , Jan. 28-Feb. 8, 2002 at 21. |
| 30 | Lorraine Cavener, "Twin Falls, Idaho, TV Station Drops Early-Evening Newscast," <i>Times-News</i> , Feb. 2, 2002. |
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