

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

In the Matter of)	
)	
2006 Quadrennial Regulatory Review –)	MB Docket No. 06-121
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	
2002 Biennial Regulatory Review – Review of)	MB Docket No. 02-277
the Commission’s Broadcast Ownership Rules)	
and Other Rules Adopted Pursuant to Section)	
202 of the Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	MM Docket No. 01-235
Newspapers)	
)	
Rules and Policies Concerning Multiple)	MM Docket No. 01-317
Ownership of Radio Broadcast Stations in)	
Local Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244

COMMENTS OF THE WALT DISNEY COMPANY

These comments are submitted on behalf of The Walt Disney Company, which through subsidiaries owns ten television stations in the following markets: New York, Los Angeles, Chicago, Philadelphia, San Francisco, Houston, Raleigh-Durham, Fresno, Flint, and Toledo. Disney also owns The ABC Television Network (again, through subsidiaries). Disney also currently owns 74 radio stations (again, through subsidiaries). These comments are being filed in response to the FCC’s Further Notice of Proposed Rulemaking in the various broadcast

ownership rulemakings captioned above, which sought further comment on the FCC's broadcast ownership rules.

In short, The Walt Disney Company is not advocating and does not seek any relaxation of the Commission's Broadcast Ownership Rules. As stated above, the Walt Disney Company owns 10 television stations that collectively have a theoretical aggregate reach of less than 24% of U.S. Television Households, well below the statutory cap of 39%. Disney has not bought a television station in more than 10 years. Disney sold any interest in newspapers years ago. Disney also has entered into a contract to divest a large number of its owned radio stations.

Given the increase in, and attractiveness of, new media outlets, in Disney's view, the Commission may soon find itself considering ways to incent, rather than restrict, ownership of over-the-air broadcast stations. However, Disney wishes to repeat that it is not advocating and does not seek any relaxation of the Commission's Broadcast Ownership Rules.

Respectfully submitted,

/s/ Susan L. Fox
Vice President, Government Relations
The Walt Disney Company
1150 17th Street, NW, Suite 400
Washington, D.C. 20036
(202) 222-4700

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