



**wisconsin**  
community papers

RECEIVED & INSPECTED  
NOV 6 2006  
FCC - MAILROOM

Wisconsin's one stop  
print media source"

DOCKET COPY ORIGINAL

Re: MB Docket No 06-121  
Resolution of Wisconsin Community Papers Relating to Media Ownership  
Rules Under Consideration by the Federal Communications Commission, 2006

Our Association and our Members believe strongly in Free Enterprise. We embrace it, act it, promote it and collectively serve as a medium to create it on Main Street, USA.

We support the First Amendment Rights of individuals and companies to freely establish free community papers or any form of print publication anywhere at any time. We do not object to their growth in size and power up to current anti-trust guidelines. We believe that the Freedom of Speech, of Private Citizens, the Press and of Commercial Enterprise is Protected for Reasons Beyond Tradition.

Moreover, Newsprint and Ink are Readily Accessible Commodities in Our Economy.

But the same is not true of the Broadcast Spectrum, rather the opposite on all counts. First, it is not a Commodity, it is a Public Trust. As such, it is Licensed, Conditionally. Maintaining a License is a Privilege not a Right. And what little remains of our Nation's Broadcast Spectrum is quantifiably Scarce.

You cannot chop a tree and harvest more Broadcast Spectrum, while the fact remains that many more people would like access to it than can be accommodated. The mere possession of an established Broadcast License, and its franchise, provide unique and powerful economic opportunities. Cross-ownership of such scarce public resources should remain regulated, while the value and influence of cable and the internet are allowed to emerge to significant, credible standards of bona fide local media outlets.

We believe that further deregulation of Broadcast Ownership, under current market conditions, will only lead rapidly to privileged concentration of cross-media dominance and economic power, community by community, by only those who can afford the ticket today.

Collectively, we strongly oppose lifting the cross-ownership ban on newspaper/broadcast properties, and discourage further loosening of standards that would allow further concentration of the privileged holding of our nation's limited broadcast licenses.

On Behalf of our Association and it's Members,

*Janelle M. Anderson*  
Janelle M. Anderson  
Executive Director - Wisconsin Community Papers

044