

MACPA

MID-ATLANTIC
COMMUNITY PAPERS
ASSOCIATION

P. O. Box 408
HAMBURG, PA 19526
OFF: 610-562-5480
1-800-450-7227
FAX: 610-562-9511
info@macpa.net



06-121

RECEIVED & INSPECTED
NOV 6 2006
FCC - MAILROOM

THIS IS A COPY ORIGINAL

October 25, 2006

**Joint Resolution of State, Regional and National Associations of
Free Community Papers Relating to Media Ownership Rules
Under Consideration by the Federal Communications Commission, 2006**

The Mid-Atlantic Community Papers Association and our members represent more than 260 independently-owned publications in an eight-state region. The states represented by MACPA are: Pennsylvania, Ohio, New York, New Jersey, Delaware, Maryland, West Virginia, Virginia as well as Washington, DC. We 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 the
Mid-Atlantic Community Papers Association
and its members,

Randy Miller
Randy Miller, President

044