

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

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<i>Application of</i>)	
)	
NEWSCORPORATION AND)	
THE DIRECTV GROUP, INC.)	
)	
Transferors,)	
)	
and)	MB Docket No. 07-18
)	
LIBERTY MEDIA CORPORATION)	
)	
Transferee,)	
)	
For Authority to Transfer Control.)	
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COMMENTS OF THE NATIONAL ASSOCIATION OF BROADCASTERS

The National Association of Broadcasters (“NAB”), pursuant to the Public Notice released by the Federal Communications Commission (the “Commission”) on February 21, 2007,¹ respectfully asks the Commission to inquire whether DIRECTV will honor its previous commitment to the Commission to expand local-into-local service to cover all 210 television markets by the end of 2008.

On September 22, 2003, News Corp., as part of its application for transfer of control of DIRECTV to it from General Motors Corporation/Hughes Electronics Corporation, committed to provide local-into-local service in all 210 television markets by 2008. Surprisingly, the

¹ *News Corporation, The DIRECTV Group, Inc. and Liberty Media Corporation Seek Approval to Transfer Control of FCC Authorizations and Licenses*, Public Notice, MB Docket No. 07-18 (February 21, 2007).

Consolidated Application for Authority to Transfer Control does not include a reference to DIRECTV's prior commitment. The application states that "because Liberty Media agrees to abide by all of the applicable prophylactic conditions previously imposed upon News Corp. in connection with its acquisition of an interest in DTV the transaction will not raise any public interest concerns."² As a technical matter, News Corp.'s commitment to serve all 210 markets by the end of 2008 was not "imposed" on it by the Commission,³ although it was an important part of News Corp.'s public interest showing.

Accordingly, NAB asks the Commission to inquire whether the new entity will honor the previous commitment to the Commission to expand local-into-local service to cover all 210 television markets by the end of 2008.

Respectfully submitted,

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² *Consolidated Application for Authority to Transfer Control*, MB Dkt. No. 07-18 filed January 24, 2007 at (i) (emphasis supplied) ("Consolidated Application").

³ The Commission mandated only that DIRECTV be required to provide, by 2004, local-into-local service in 30 markets beyond what it then had previously "funded, projected or planned." *Memorandum Opinion and Order* in MB Docket No. 03-124 rel. January 14, 2004 at ¶ 334 ("MO&O").