

**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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**RESPONSE OF THE NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (“NAB”),<sup>1</sup> pursuant to the Public Notice released by the Federal Communications Commission (the “Commission”) on February 21, 2007,<sup>2</sup> hereby responds to the Comments filed in connection with the proposed transfer of control of DIRECTV from News Corp. to Liberty Media.

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<sup>1</sup> The National Association of Broadcasters is a trade association that advocates on behalf of more than 8,300 free, local radio and television stations and also broadcast networks before Congress, the Federal Communications Commission and the Courts.

<sup>2</sup> *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).

In its Comments in this proceeding,<sup>3</sup> NAB asked the Commission to inquire whether DIRECTV and Liberty Media intended to honor the 2003 commitment of News Corp. and DIRECTV to provide local-into-local service in all 210 television markets by 2008.

Also filed in the Comment phase of this proceeding was a Petition to Deny filed by the North Dakota Broadcasters.<sup>4</sup> In their Petition, the North Dakota Broadcasters urged that a condition requiring local-into-local service to all 210 television markets be placed on any grant of the transfer of control applications filed in this proceeding. North Dakota Broadcasters state that Petitioners' failure to meet this condition "would directly harm both the North Dakota Broadcasters and those residents of North Dakota who cannot now receive any local television programming from DIRECTV."<sup>5</sup> They further state that requiring these proposed conditions would promote localism and competition with cable and other multichannel video program distributors.

NAB agrees that providing local-into-local service promotes localism and benefits consumers by enhancing competition.<sup>6</sup> Accordingly, we urge DIRECTV and Liberty Media to honor DIRECTV's previous commitment to provide local-into-local service by December 31, 2008.

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<sup>3</sup> Comments of the National Association of Broadcasters in MB Docket No. 07-18 filed March 23, 2001 ("NAB Comments").

<sup>4</sup> Petition to Deny filed by the North Dakota Broadcasters in MB Docket No. 07-18 filed March 23, 2007 ("North Dakota Broadcasters' Petition").

<sup>5</sup> North Dakota Broadcasters' Petition at 3.

<sup>6</sup> See Comments of the National Association of Broadcasters in MB Docket No. 03-124 filed 6/16/03 at 27.

Respectfully submitted,

**NATIONAL ASSOCIATION OF BROADCASTERS**  
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Marsha J. MacBride  
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Benjamin F.P. Ivins

**CERTIFICATE OF SERVICE**

I, Yvonne S. Hughes, hereby certify that a true and correct copy of the *Response of the National Association of Broadcasters*, was sent this 9<sup>th</sup> day of April 2007, by first class mail, postage prepaid, to the following:

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