

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
News Corporation and The DIRECTV Group, Inc.,)
Transferors,)
)
And) MB Docket No. 07-18
)
Liberty Media Corporation,)
Transferee,)
)
For Authority to Transfer Control.)

RESPONSE OF THE MAINE ASSOCIATION OF BROADCASTERS

The Maine Association of Broadcasters (MAB) supports the Petition to Deny filed by the North Dakota Broadcasters (NDB) in the matter of MB Docket No. 07-18 concerning the proposed transfer of 38 percent of News Corporation and the DirecTV Group to Liberty Media Corporation.

MAB represents the interests of some 140 commercial, non-commercial educational, college, religious, community, and public radio and television broadcast stations in the State of Maine. It offers the following reasons for its support of the NBD petition:

In 2004, when News Corporation acquired 34 percent of DirecTV, the company pledged to provide local-into-local carriage of local broadcasters' television signals in the Designated Market Areas (DMA) where local-into-local satellite coverage was not yet offered. The company committed to providing local carriage in all 210 DMAs by 2008.

Despite the expanded capacity of DirecTV's satellite system, the company has not yet fulfilled its promise to extend local-into-local coverage in 68 small markets, including Presque Isle, Maine (DMA #204). This willful denial of service in small, rural television markets by an FCC licensee is contrary to established government policies that encourage or require universal service in areas such as electric power, telephone service, transportation, and public education. Satellite capacity is not at issue, since DirecTV has announced its intention to deploy two additional satellites in 2007, and Presque Isle is served by only two full-power television stations.

In addition to being consistent with government goals and policies supporting universal service, universal local-into-local carriage of broadcast TV signals would enhance the competitive landscape for subscription television service. Satellite television services benefit from higher subscription numbers in markets where they provide local-into-local service, compared to markets where no local-into-local service is offered. In addition, competition from satellite television services provides an economic constraint on subscription pricing for traditional cable television services offered in the same areas.

Since 2004, News Corporation and DirecTV have used increased satellite system capacity to expand their offering of high-definition television content to subscribers but have not used the

increased capacity to expand local-into-local service into the small and rural television markets that would benefit from such service.

MAB agrees with the NDB that the News Corporation-DirecTV petition should be denied unless approval is conditioned on a specific requirement to achieve the goal of universal service for small and rural television markets within a reasonable period of time. Only if this condition is met will the public interest be served.

Respectfully submitted,

Maine Association of Broadcasters
69 Sewall Street, Augusta, Maine 04330

A handwritten signature in black ink, appearing to read "Suzanne D. Goucher". The signature is fluid and cursive, with the first name being the most prominent.

Suzanne D. Goucher, President & CEO