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June 8, 2007

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th St., S.W., TW-A325  
Washington, D.C. 20554

Re: Notice of *Ex Parte* Communication  
DA 07-1947

Dear Ms. Dortch,

Pursuant to section 1.1206(b)(2) of the Commission's rules, we hereby submit this notice regarding an *ex parte* communication in the above-referenced proceeding.

On June 7, 2007 Andrew Jay Schwartzman and Parul Desai of Media Access Project (MAP), Angela Campbell, Marvin Ammori, and Coriell Wright of the Institute for Public Representation (IPR) met with Commissioner Jonathan Adelstein, Rudy Brioché, Katie Yocum, Margaux Berwitt, and Christopher Noam regarding the proposed transfer of control of the Tribune Company to Samuel Zell.

MAP and IPR stated that allowing a transfer of Tribune's current newspaper-broadcast combinations would be a violation of the Newspaper-Broadcast Cross-Ownership Rule, which forbids common ownership of a newspaper and broadcast station in the same market. Recognizing that they are restricted proceedings, MAP and IPR did not discuss the merits of Tribune's pending television license renewals in Los Angeles, Hartford, and New York or the pending Petition for Reconsideration of the Commission's April 2005 Counterpoint decision, but did refer to those proceedings for purposes of providing factual context.

MAP and IPR underscored the following points:

- The purpose of the Newspaper-Broadcast Cross-Ownership Rule, as stated by the Commission and affirmed by the Supreme Court, is to provide for ever increasing diversity by requiring combinations grandfathered at the time of the rule's enactment to be divested in any subsequent transfers of ownership. The requested waivers would not be consistent with that goal.

- It is established Commission policy not to grant waivers based on the mere pendency of a rulemaking.
- Tribune had ample opportunity to sell its television and newspaper properties separately, indeed it received several offers to do so.
- Consistent with the purpose of the Rule, the FCC has only ever granted waivers to the Newspaper Broadcast Cross-Ownership rule to preserve a failing media property or to temporarily allow for the orderly disposition of an otherwise offending newspaper-broadcast combination.

In accordance with the Commission's rules this *ex parte* notice is being filed electronically in the above referenced docket. If you have questions regarding this filing please do not hesitate to contact me at 202-662-9543.

Respectfully Submitted,  
/s/  
Coriell Wright