

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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| In the Matter of:  | ) | MB Docket No. 07-119  |
|  | ) |   |
| Transfer of Control from Shareholders of<br>Tribune Company to Samuel Zell | ) | File Nos. BTCCT-20070501AEY,<br>BTCCT-20070501AEZ,<br>BTCCT-20070501AFK,<br>BTCCT-20070501AGB,<br>BTCCT-20070501AGE |

**SUPPORTING COMMENTS OF GANNETT CO., INC.**

Gannett Co., Inc. ("Gannett") strongly supports each of the referenced Requests for Waiver submitted for the New York, New York; Los Angeles, California; Chicago, Illinois; Miami-Fort Lauderdale, Florida; and Hartford-New Haven, Connecticut markets where Tribune currently owns and operates newspaper/broadcast combinations. Each of the requests seeks a temporary waiver of the newspaper/broadcast cross-ownership rule pending completion of the on-going Commission rulemaking addressing the cross-ownership ban and several other FCC broadcast ownership rules.

Gannett has repeatedly argued in comments filed with the Commission that, although the marketplace has evolved with lightning speed, the Commission's media ownership rules have remained in limbo, artificially constraining the ability of traditional media companies to compete in this multimedia universe. Most importantly, the limits on newspaper/broadcast cross-ownership that remain in place today continue to deny consumers the established and sizable benefits that can be achieved by more efficient combinations of resources in the media sector. In 2003, based on the wide-ranging

record before it (including comments from Tribune demonstrating how its cross-owned newspaper/broadcast properties serve these communities), the Commission concluded: "(1) the rule cannot be sustained on competitive grounds; (2) the rule is not necessary to promote localism (and in fact may harm localism) and (3) most media markets are diverse, obviating a blanket prophylactic ban on newspaper-broadcast combinations." The Third Circuit resoundingly upheld these critical judgments concerning newspaper/broadcast cross-ownership.

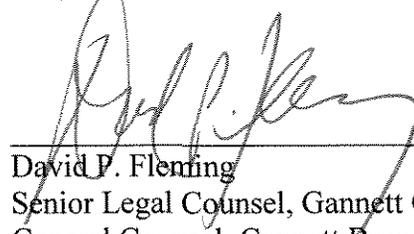
In this matter, Tribune essentially asks the Commission to confirm that, for a temporary period of time, consumers in the five markets have a sufficient number of news and informational outlets available to them so as to ensure that they will be well-informed and exposed to a variety of viewpoints. It is difficult to imagine how the FCC could conclude anything but that they do.

The Tribune requests are not only reasonable but make perfect sense in today's digital environment where the Internet and the broadband distribution of information is a fundamental and widely-utilized source of world, national, and local news and information. Tribune is not seeking to create any new media combinations. Rather, it asks only to maintain the status quo until the outcome of the media ownership proceeding is decided.

Tribune has shown that each market is served by an abundance of traditional media outlets and has become less concentrated in recent years and that these combinations have benefited the local communities by fostering the creation and delivery of more and higher quality local news and informational programming.

In view of the foregoing, Gannett respectfully requests that the Commission expeditiously grant each of the Tribune waiver requests.

Respectfully submitted,



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June 26, 2007

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**Certificate of Service**

I, David P. Fleming, hereby certify that on this 26<sup>th</sup> day of June, 2007, a copy of the foregoing comments was served by first-class mail, postage prepaid, upon the following:

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