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June 29, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Docket Number: 07-119
Ex Parte

Dear Ms. Dortch:

This is to inform you that, on June 28, 2007, Dan Willett of the International Brotherhood of Teamsters (IBT) presented testimony on behalf of the IBT and its General President, James P. Hoffa, to the Federal Communications Commission Localism Hearing that took place in Portland, Maine. A copy of the testimony, as presented, is attached for inclusion in, and as it relates to, the above referenced docket.

Please direct any questions regarding this matter to the undersigned.

Respectfully,



Henry Goldberg
*Counsel to the International Brotherhood
Of Teamsters*

Attachment

**TESTIMONY OF THE INTERNATIONAL BROTHERHOOD OF TEAMSTERS
TO THE FEDERAL COMMUNICATIONS COMMISSION LOCALISM
HEARING, PORTLAND, MAINE, JUNE 28, 2007**

Good evening. My name is Dan Willett and I am testifying on behalf of the International Brotherhood of Teamsters and its General President James P. Hoffa. My comments tonight focus on how corporate ownership structures can affect the fundamental FCC concerns of localism and diversity and present opportunities for the FCC to enhance the public interest when drafting its new rules.

Concerns about broadcast localism and diversity have come to our attention with the recent applications by the Tribune Company to transfer ownership and seek continuation of waivers of the Commission's media cross-ownership rules. The terms of the proposed buyout, which will transfer *ownership* of the \$8.2 billion media conglomerate to an Employee Stock Ownership Plan but *control* to one investor, underscores a growing need for the FCC to ensure protections of local and diverse viewpoints in its broadcast ownership rule making.

In the proposed Tribune buyout, ownership of the company, including its 16 newspapers and 23 television stations, will be transferred to an S-Corporation Employee Stock Ownership Plan (ESOP) which will own 100% of the company and be responsible for paying the billions of dollars of new debt incurred in the transaction while, real estate entrepreneur and investor Sam Zell, will serve as the Chairman of the Board and effectively control the \$8.2 billion company. Tribune's employee-owners will have no voice in the governance of the ESOP or the operating company.

Although called an Employee Stock Ownership Plan, employees will have few real ownership rights.

The Tribune change of ownership provides a unique opportunity for the FCC to consider how ownership structures affect localism and viewpoint diversity. If given a chance, Tribune employee-owners could play a crucial role in enhancing localism and diversity for the benefit of the public served by the Tribune. These 21,000 individuals – some of them Teamsters – spread across the country, live and work in the areas that Tribune’s broadcast properties serve and could provide a meaningful and diverse perspective to Tribune’s programming and operations that would be responsive to the concerns of the local communities. Such a perspective is particularly important, when the FCC is being asked to extend the Tribune’s cross-media ownership waivers.

We understand that broadcasters are given broad latitude in how they choose to finance their ownership structures. However, to the extent that an ownership structure in and of itself negatively affects the public interest and could be improved in the very localism and diversity dimensions that the FCC traditionally has fostered, particularly when there are requests to extend cross ownership waivers, we urge the Commission to make a special effort to address this concern.

The International Brotherhood of Teamsters represents 1.4 million members, including approximately 2,000 who work for Tribune. Tens of thousands of Teamster members and retirees reside in Tribune-served media markets located coast-to-coast. Teamster

members' livelihoods, economic wellbeing, and their access to a diversity of news and opinions on public events depend on the outcome of this change in ownership.

The International Brotherhood of Teamsters has filed comments with the FCC urging the Commission to insist that localism and diversity concerns be sufficiently addressed before approving the transaction.

We urge the Commissioners to also address the types of concerns raised by the Tribune change of ownership and waiver applications, in the FCC's ongoing broadcast ownership rule making.

Thank you.