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FOUNDED 1866

November 19, 2007

Filed Electronically

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Ex parte submission of Allbritton Communications Company
2006 Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 06-121
2002 Biennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 02-277
Cross-ownership of Broadcast Stations and Newspapers, MM Docket No. 01-235

Dear Ms. Dortch:

On November 15, 2007, Jerald N. Fritz, Senior Vice President and General Counsel, Allbritton Communications Company ("Allbritton"), and Mark D. Schneider of Sidley Austin LLP met with Commissioner Robert McDowell and Cristina Chou Pauzé, Legal Advisor for Media Issues. In the meeting, Mr. Fritz discussed Allbritton's media business in Washington, D.C., including Station WJLA-TV, WJLA's digital sub-channel Local POINT TV, and Allbritton's new publication, *The Politico*, launched in January 2007.

In the meeting, Mr. Fritz discussed the fact that under the current newspaper-broadcast cross-ownership rule (the "Rule"), Allbritton's ownership of WJLA and the *The Politico* does not violate the current Rule for two independent reasons: (1) *The Politico* is a specialized newspaper, as opposed to a newspaper of general circulation and (2) *The Politico* is published less than five days per week. *See* 47 C.F.R. § 73.3555, note 6. Allbritton also highlighted the fact that pursuant to the revised newspaper-broadcast cross-ownership rule adopted by the Commission in 2003 and subsequently stayed by the Third Circuit, *The Politico* would not have been subject to the prohibition because it was a new newspaper started by a broadcaster. *See 2002 Biennial Regulatory Review*, 18 FCC Rcd. 13620, ¶ 456 (2003) ("Our rules will not, however, bar a broadcast television station in such a market from starting a new newspaper, as

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that would expand, not decrease, diversity."). Allbritton indicated that during the appeal of the June 2003 Order, no party challenged this part of the Commission's decision.

Finally, Allbritton requested that any new rule adopted by the Commission should reflect the definition of "daily newspaper" that excludes specialty newspapers and new start-up publications from the prohibition. As part of this recognition, the Commission should "grand-father" new publications that have been started with the resources of a broadcast station, and permit them to be transferred with the media properties with which they have been associated, including any local broadcast station. Only in this way will the Commission encourage, and not penalize, the expenditure of resources to increase the outlets for viewpoint expression.

Enclosed please find information provided to the attendees in connection with this meeting.

Respectfully submitted,

Mark D. Schneider

Mark D. Schneider

Enclosure

cc: Cristina Chou Pauzé, Office of Commissioner McDowell

THE POLITICO

The Politico launched in January, 2007 with the mission of covering the politics of Capitol Hill, the presidential campaign, the business of Washington lobbying and advocacy with enterprise, style, and impact. *Politico* is a publication of Capitol News Company, LLC, a subsidiary of Allbritton Communications Company. Its more than 50 journalists have come to *Politico* with the vision of creating ***the*** elite corps of political reporters anywhere in the nation. Its ranks are filled with the best talent from: *The Washington Post* (Harris, VandeHei, Martinez, Schroeder), *New York Times* (Glass), *USA Today* (Nichols), *Congressional Quarterly* (Mark), *Wall Street Journal* (Cummings, Smith), *Time Magazine* (Allen), *US News/Bloomberg* (Simon), *Roll Call* (Bresnahan), *National Review* (Martin), *Newhouse* (Frerking), *Dallas Morning News* (Hillman) and *many* more.

In addition to its advertiser-supported, 3-day per week specialty print publication (25,000 copy free print distribution), Politico operates Politico.com, a 24/7 website that features constantly updated stories and a substantial number of in-depth and supplemental add-ons.

WEBSITE ELEMENTS

Political News. All stories that appear in Politico's print version, with additional coverage online throughout the rest of the week and weekend.

Political Blogs. Four regular blogs with multiple blog posts daily:
- **The Crypt** - Congress,
- **Smith** and **Martin** - '08 election races
- **Shenanigans** - Washington gossip.

Columnists. Regular columns from Politico reporters including:
- **Roger Simon** - Simon Says,
- **Jeanne Cummings** - Pit Boss
- **Helena Andrews** - Pop and Politics

Speak To Power. Editorials written by Politico readers, contributed through the website. Selected pieces appear online and in print.

Committee Insider Series. In-depth coverage of congressional committees with stories, interviews, and multimedia features.

You Report. Political stories written by Politico readers, contributed through the website. Selected pieces appear online and in print.

Multimedia. Video clips including interviews and news recaps; live streams; and user-submitted videos.

Daily Digest and Email Alerts. Regular emails to Politico users with daily headlines and breaking news alerts. Users can subscribe and modify their preferences for these emails online.

Playbook. Analysis of political stories of the day, available only online and by email.

Playbook 24/7. Links to top political headlines of the day, updated constantly. Also available by email.

Campus Politico. A website section with stories and multimedia features highlighting issues that concern students and young voters.

Debates and Candidates. A website section featuring details of the presidential debates, and individual pages highlighting each candidate.

Polls. User polls with questions related to a top political story of the day.

Blogosphere and BlogJam. Flash map of political bloggers in unique constellation presentation, and regular profiles of political bloggers by Politico staff.

Stat Tracker. Visual display of online metrics that pertain to the presidential candidates, tracking activity such as Google News stories, YouTube popularity, and Facebook friends.

MyPolitico. Profile pages for users.

Open Forum. Feature for users to comment on stories or on user-generated threads.

Politico Jobs. Job listings.

Live Chat. Feature for users to ask real-time questions to Politico reporters.

Store. E-commerce feature to purchase Politico clothing and accessories.

Photo Galleries. Photo galleries on topical themes, often compiled as slide shows with audio narratives or music.

Plays For Presidency. Classification system for political strategy accompanied by an interactive flash guide and blog.

RSS. Real Simple Syndication in XML format of top stories and regular features.

Search. Search functionality of all stories, blogs, and user-generated content sorted by relevance and date.

Mobile Site. Launching in November.

For Immediate Release
October 4, 2007

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ALLBRITTON COMMUNICATIONS AND ABC 7/WJLA-TV ANNOUNCE THE LAUNCH OF LOCAL POINT TV

Local POINT TV Looks to Change the Landscape of Local Television Programming by Drilling Down to Everything Local

Arlington, VA – Allbritton Communications, in conjunction with its Washington, DC flagship station ABC 7/WJLA-TV, is pleased to announce the launch of **Local POINT TV** in the digital sub-channel segment of the broadcast spectrum and carried on **Comcast 205 and FiOS 867**. An alternative to standard programming, the goal of Local POINT TV is to return to television's creative roots -- something interesting, creative, useful ... and local.

"Local POINT is the essence of 'localism'. We are using the power of our new digital channels to bring LOCAL news, films, music, and even comedians to today's hip and fun viewers," said Robert Allbritton., Chairman and CEO of Allbritton Communications.

Local POINT TV is a series of short segments, typically five minutes or less, focusing on local talent and local interests. Local POINT will foster talent including filmmakers, producers, animators, musicians, comics, storytellers and more. Local POINT TV will also feature current news and entertainment information.

There are no commercials in the traditional sense on Local POINT TV. Instead advertisements will appear as crawls across the bottom of the television screen. All advertisements will be action-oriented offering an immediate impact for viewers and advertisers. Local POINT TV will have a limited number of advertisers to more effectively maximize partner benefits.

-MORE-

Local POINT TV will have a strong web-based component, www.localpointtv.com. Content segments that appear on air will be available for playback on the website as well. Eventually viewers will be able to vote on their favorite segments which will increase the frequency in which the segment airs.

Paul Sherno, Local POINT TV creator noted, "We haven't had this much freedom to create new television since the days before black & white! Programming is designed to be fast, fun and capture the attention span of all the market's multi-taskers."

Preview the Channel on the web at:
http://localpointtv.com/watch2.php?VideoID=363

In addition to WJLA, Allbritton Communications Company and its affiliates own NewsChannel 8, the Washington area's 24 hour-cable news station as well as the political newspaper and website, *Politico*. It also owns ABC affiliated stations in six other markets:

- Birmingham-Tuscaloosa-Anniston, AL (WBMA/WCFT/WJSU)
- Harrisburg, PA (WHTM)
- Little Rock, AR (KATV)
- Tulsa, OK (KTUL)
- Roanoke-Lynchburg, VA (WSET)
- Charleston, SC (WCIV)

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Television Business Report™

Voice of the Broadcasting Industry™

Volume 24, Issue 195, Jim Carnegie, Editor & Publisher — Friday Morning October 5th, 2007

TV News ®

Allbritton embraces local content

Local video makers in the DC area don't have to just post their videos on the Internet and hope that someone will click. Allbritton Communications and flagship WJLA-TV have launched Local Point TV as a digital simulcast channel to carry strictly local content from local artists. The channel is also being cleared on Comcast and FiOS in the market. "Local Point is the essence of 'localism.' We are using the power of our new digital channels to bring local news, films, music, and even comedians to today's hip and fun viewers," said company CEO Robert Allbritton. The segments being produced by local video makers - and who doesn't have the equipment to produce a video these days? - typically run five minutes or less. The idea is to foster talent including filmmakers, producers, animators, musicians, comics, storytellers and more. Local Point TV will also feature current news and entertainment information.

What about ads? Yep, but with a twist. Instead of spots, advertisements will appear as crawls across the bottom of the television screen. All advertisements will be action-oriented, offering an immediate impact for viewers and advertisers. Local Point TV says it will have a limited number of advertisers to more effectively maximize partner benefits. Even if you are not in the DC market, you can check out the concept at localpointtv.com, a robust website which will be a major component of the project. Content segments that appear on air will be available for playback on the website as well. Eventually viewers will be able to vote on their favorite segments which will increase the frequency in which the segment airs. "We haven't had this much freedom to create new television since the days before black & white! Programming is designed to be fast, fun and capture the attention span of all the market's multi-taskers," said Paul Sherno, Local Point TV's creator.

TVBR observation: Sure, it's a broadcast twist on YouTube, but what's wrong with that? YouTube is an online twist on television. What's great here is that people will be able to tell their friends to tune in on TV to watch the video they've created - and even groups can watch on a real TV screen, not a small box on a computer screen. What the online component adds, along with non-linear playback access, is an opportunity for viewers to discuss the videos, often with the creator.