DowLohnes

November 26, 2007

VIA ELECTRONIC FILING

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

Re: Notification of Ex Parte Communication
MB Docket Nos. 06-121 and 02-277
MM Docket Nos. 01-235, 01-317, and 00-244

Dear Ms. Dortch:

This is to advise you, in accordance with Section 1.1206 of the FCC's rules, that on November 21, 2007, on behalf of Media General, Inc., I emailed the attached material to Amy Blankenship, Legal Advisor to Commissioner Deborah Taylor Tate, at her request.

As required by Section 1.1206(b), as modified by the policies applicable to electronic filings, one electronic copy of this letter is being submitted for each above-referenced docket.

Very truly yours,

M. Anne Swanson

Enclosures
cc w/encl. (by email):
Amy Blankenship, Esquire

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
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
	)	
Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets	)	MM Docket No. 01-317
	)	
Definition of Radio Markets	)	MM Docket No. 00-244

COMMENTS OF MEDIA GENERAL, INC.

(Volume 1: Comments and Appendices 1-8)

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Its Attorneys

October 23, 2006

entitled "Exploring Our Faith" addressed the differences and similarities in practices and beliefs among various local religious communities.

In the Roanoke DMA, political coverage and sports reporting have realized the most benefits from convergence. Earlier this year, the WSLS-TV staff worked together with the newspapers' staff to broadcast two 30-minute local news specials, one on new Virginia Governor Tim Kaine's inauguration and a second on the opening of the new state legislative session in Richmond. As detailed in Professor Powell's Statement, WSLS-TV also works with the newspapers to ensure the widest election night coverage possible. In addition, it broadcasts debates and, during election season, broadcasts "Ad Watch/Truth Tracker," which examines political advertisements and free time segments given to candidates and then reports on any inaccuracies they include.

Every Friday night in the fall, staff at all three platforms work together to present "Friday Football," a broad cross-media effort that provides unparalleled coverage of 55 high school football teams throughout the DMA. Based on this collaboration, WSLS-TV broadcasts a 30-minute sports report from 11:15-11:45 p.m., in an extended late news broadcast, presenting final scores, stories and videos from key high school football games throughout the DMA. Without the participation of personnel from all three platforms, the newscast could not cover all the region's games. Media General has also established a special joint website, www.fridayfootball.com, to which it posts longer reports and video, adding content to the televised report.

Tri-Cities. In the Tri-Cities, Tennessee/Virginia DMA, Media General owns television station WJHL-TV, which is licensed to Johnson City, Tennessee, and the *Bristol (Virginia-*

Tennessee) Herald Courier, which is published in Bristol, a city that straddles the state border. Media General also operates a joint portal for these platforms at www.tricities.com.

Like Roanoke, Tri-Cities is a mountainous DMA with dispersed population centers, yet, as Professor Powell explains, Media General is able to ensure coverage of breaking news throughout the region by utilizing facilities in three locations: WJHL-TV's main studio in Johnson City; another studio which it maintains in the *Herald Courier*'s newsroom in Bristol; and a news bureau in Kingsport, Tennessee.[22] The newspaper and television station are linked by two-way fiber. Before convergence began, a WJHL-TV reporter would have had to drive 45 minutes from Bristol back to WJHL-TV's Johnson City studios to broadcast news about the Bristol area on WJHL-TV's airwaves. Now, WJHL-TV and newspaper staff can make sure that reports from Bristol are broadcast right away. WJHL-TV has added 90 minutes of additional local news coverage every weekday.

Working together, Media General's Tri-Cities platforms also have greatly expanded their political coverage. Professor Powell devotes over five pages of his statement to reviewing these benefits, which range from a special three-day series of live reports on the opening of the Tennessee legislature earlier this year to presentation of pre-election profiles of candidates in most local and regional races to comprehensive election night coverage of races in jurisdictions spanning the DMA.

Additionally, WJHL-TV broadcasts other numerous special reports and regularly televised series that would not be possible without access and input from the newspaper's staff. The most prominent example is "Medical Watch," which WJHL-TV airs every weekday evening during two of its early evening newscasts. The newspaper publishes a monthly "Medical Watch"

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[22] *Powell*, Exhibit C (Tri-Cities).

special insert. Reporters from each outlet work together in this effort, which also includes a quarterly in-depth television special on a health-related issue of particular local importance. One recent segment focused on the high incidence of obesity and diabetes in the Tri-Cities area. During the diabetes special, viewers could phone questions to an expert panel; the website also featured a questionnaire users could complete to evaluate their own condition. Like Media General's other convergence markets, WJHL-TV has been able to broadcast innumerable breaking news stories and other reports due to its relationship with the newspaper. Professor Powell's report lists literally hundreds of such examples in the last several years.

Myrtle Beach-Florence, South Carolina. In the Myrtle Beach-Florence, South Carolina DMA, Media General owns television station WBTW(TV), which is licensed to Florence, South Carolina, and the *Morning News*, which is published in Florence. Earlier this spring, Media General also launched a portal for both outlets -- www.scnow.com.

As Professor Powell reports, the *Morning News* was established in 1922, and WBTW(TV) has found access to the archives of the paper to be crucial not only to ongoing coverage of news in the area, but to the development of special and investigative reports.[23] For example, archival material from the newspaper made possible WBTW(TV)'s 2004 report on the half-century anniversary of *Brown v. Board of Education* and the local impact of the decision. Coastal storms and weather are frequently important news issues in the DMA, and WBTW(TV) has relied on the archives repeatedly in its weather coverage, such as in its production and broadcast of an in-depth report on "Storms of the Century." Indeed, weather is such an important regional issue that Media General has supplied WBTW(TV) and all of its television

[23] *Powell*, Exhibit D (Myrtle Beach-Florence).

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Definition of Radio Markets	)	MM Docket No. 00-244

COMMENTS OF MEDIA GENERAL, INC.

(Volume 2: Statement of Professor Adam Clayton Powell, III, Appendix 4A with Exhibits)

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October 23, 2006

Tri-Cities, Tennessee, Virginia

In the Tri-Cities, Tennessee/Virginia DMA, Media General, through its subsidiaries, owns television station WJHL-TV, which is licensed to Johnson City, Tennessee, and the *Bristol (Virginia-Tennessee) Herald Courier,* which is published in Bristol, a city that straddles the Virginia-Tennessee border. The properties are located approximately twenty-five miles apart. Media General also operates a joint website for the *Herald Courier* and WJHL-TV at www.tricities.com. It acquired WJHL-TV in 1997, and the newspaper in January 1998.

Locations, Facilities and Staff. The Tri-Cities market consists of three main population centers, Johnson City and Kingsport, Tennessee, and Bristol, on the Virginia-Tennessee state line. Historically, WJHL-TV had been oriented more toward covering the Tennessee counties in the DMA, and the *Herald Courier* had served the Virginia counties. Since convergence began, WJHL-TV, through access to the newspaper's resources, has been able to broaden its focus and cover more stories, particularly news occurring in the southwestern Virginia counties. Working together, Media General's outlets in the DMA have been able to deliver more news reports, including breaking news, than they could have done independently. Not only have the

number of WJHL-TV's stories on that part of Virginia increased, but the content of stories about news in Virginia has been deepened and made more thorough through convergence. Equally important, each outlet has brought new and different perspectives to its coverage of these stories.

Because of the extremely mountainous nature of the Tri-Cities DMA, WJHL-TV operates a satellite truck to ensure that it can respond to events occurring throughout the market. To ensure that it is able to rapidly report on the daily stories that occur in the Bristol area, WJHL-TV maintains a studio in the *Herald Courier*'s newsroom in Bristol, from which it has been able to air breaking news and other stories related to that area. Before convergence began, a WJHL-TV reporter would have had to drive approximately forty-five minutes from Bristol back to WJHL-TV's Johnson City studios to send breaking news about the Bristol area out over WJHL-TV's airwaves. Today, breaking news stories can be sent by fiber from the *Herald Courier* to WJHL-TV's facilities and broadcast immediately. To help ensure such immediate coverage of the entire Tri-Cities area, WJHL-TV in May 2006 also opened a new bureau in Kingsport, Tennessee which is staffed by a WJHL-TV reporter and photographer every weekday.

Despite the distance between them, the converged Media General properties remain extremely connected. A two-way fiber link that allows rapid and continuous sharing of information runs between the physical locations of the television station and the newspaper. Photographers at the *Herald Courier*, in addition to their "still" cameras, carry video equipment to shoot material for the television station. Photographers at WJHL-TV, in turn, carry "still" cameras along with their video equipment. All the photographers have received extensive training on both types of equipment. The *Herald Courier* has also invested in equipment that allows it to edit the video its photographers capture before the content is sent to WJHL-TV via fiber for broadcast.

Since convergence began, the three outlets have not shared any employees, except a "convergence intern," who is employed through a special program to give recent graduates experience on all three platforms. The three outlets have separate and independent editorial staffs, and each outlet makes its own independent editorial decisions. To maximize the coverage of news in the DMA, however, the editors at each outlet post their news budgets on a special internal website that allows the editors to view which reporters at which locations are available to cover "breaking news" as

it arises around the DMA. Personnel at all three outlets also communicate throughout the day by telephone and e-mail to ensure the widest possible and most in-depth coverage of news in the DMA. For instance, although most of the *Herald Courier*'s reporters are assigned on a geographic basis, two reporters have specific substantive "beats" -- education and crime. WJHL-TV's reporters have been able to call upon the specialized knowledge and contacts of these reporters when WJHL-TV is working on stories related to education or crime, such as the stories aired in WJHL-TV's "Education Watch" series. WJHL-TV reporters frequently collaborate and share research with the *Herald Courier's* education reporter for the station's education watch segments. Although the reporters from each outlet typically prepare their own stories for broadcast or publication, the *Herald-Courier's* education reporter has appeared in on-air interview segments during WJHL-TV's "Education Watch" segments. The archives maintained by the *Herald Courier*, which has been in existence since 1865, also provide an unparalleled local research source when WJHL-TV's reporters need to check on facts that otherwise are no longer documented in the community.

By working together, the three outlets have increased both the quantity and quality of their coverage of news,

political issues, weather, sports, and community events. Since 1998, WJHL-TV has added ninety minutes of additional local news coverage every weekday, and now broadcasts a total of over twenty-five hours per week of local news. WJHL-TV has added daily weekday newscasts from 5:00 - 6:00 a.m. and from 5:30 - 6:00 p.m. (WJHL-TV's current news schedule is set forth in detail at Tab 1.) Every weekday, WJHL-TV also produces an internet-exclusive news webcast of approximately ninety seconds to two minutes in duration, which is posted on Tricities.com in the late afternoon. The webcast provides news and information with a DMA-wide focus.

This coordination and sharing of resources has resulted in a greater quantity and higher quality of news in the DMA but has not resulted in staff reductions. In January 1998, when Media General acquired the *Herald Courier* and convergence in the Tri-Cities market became possible, WJHL-TV had 83 total employees and 30 news department employees. By the end of 2005, Media General had added four employees in the station's news department, and 10 employees overall.

Political Coverage. By working together, the staffs of the outlets have been able to provide extensive special coverage of regional stories, and even state and national

issues of importance to the DMA, in a manner that would not have been possible before convergence. For example, WJHL-TV and *Herald Courier* crews have traveled to Nashville to report on issues to be considered by the Tennessee Legislature during its regular and special sessions. Earlier this year, the WJHL-TV crew delivered live reports over three consecutive days. Several of these reports included information provided by the *Herald Courier* reporter who had been covering entirely different legislative issues, thus supplementing and enhancing WJHL-TV's legislative coverage. One legislator received such positive reports about the depth of the reporting from his constituents that he requested permission to stream the reports on his own website. The WJHL-TV reporter was also able to provide information, and therefore more depth, to the report the newspaper correspondent prepared. Approaching the legislative story from different angles, they were able to convey wider information and more details to Tri-Cities DMA residents than would have been the case absent convergence.

Teams from both outlets took a similar approach in covering and delivering news about Virginia Governor Tim Kaine's inaugural gala in Abingdon, Virginia earlier this year. The teams focused on different angles of the story.

WJHL-TV's live reports from the gala also featured on-camera reporting by two newspaper reporters and different information they had collected.

Whenever elections or other political events occur in the Tri-Cities area, WJHL-TV's viewers benefit from the station's ability to tap into the experience and in-depth analysis of the *Herald Courier*'s team of political reporters as well as their greater access to newsmakers and residents in Bristol and southwestern Virginia. For example, during elections affecting the Bristol area, the *Herald Courier* routinely sends candidates questionnaires which solicit responses on key issues. The candidates' answers are provided to WJHL-TV and Tricities.com. The television station and newspaper provide reports on the answers from candidates for many of the races; Tricities.com makes the responses from candidates for all races available on-line.

WJHL-TV's on-air coverage during campaigns and on election nights has also benefited from convergence. Most recently, in the thirteen days leading up to the August 2006 Tennessee state primary elections and local general elections, WJHL-TV ran pre-election profiles of every candidate in nine different races. For several key races, WJHL-TV reporters interviewed *Herald Courier* reporters who

have specialized in political coverage and, through their long tenures with the paper, have acquired in-depth knowledge helpful to local voters. On election night, working together with the *Herald Courier*, WJHL-TV was able to provide coverage of 100 Tennessee races. *Herald Courier* reporters helped out by phoning in results and information from precincts in Sullivan County, Tennessee that was placed in crawls on the television screen as it became available, and the paper's opinions page editor was available to provide on-air commentary and interpretation during the election newscasts. A complete wrap-up of all results was also posted to Tricities.com. During May 2006 general elections in Tennessee and Virginia, WJHL-TV followed much the same approach during the campaign and on election night, delivering more content to viewers than would have been possible if it had acted alone.

In the November 2005 Virginia general election, WJHL-TV provided coverage of eighteen local races, broadcasting in-depth pre-election profiles of candidates in several key races. As part of its pre-election coverage, WJHL-TV conducted interviews with *Herald Courier* reporters who had extensive knowledge of specific candidates, races, and issues in the Bristol area. These *Herald Courier* reporters also provided results and additional information that WJHL-

TV included in its election night broadcasts and analysis. In addition to providing election night coverage on WJHL-TV and post-election reports in the *Herald Courier*, Media General posted all profiles and results to Tricities.com.

Various elections over the past several years provide further examples of the benefits of convergence. On February 10, 2004, voters in the Tri-Cities area cast ballots in the Presidential primaries in both Tennessee and Virginia as well as in several local Tennessee legislative races. Prior to election day, WJHL-TV prepared and aired a series of reports on the voting process itself, the candidates in various races, and the issues at stake in different referenda. The staff of the *Herald Courier* contributed information on the process of voting in Virginia as well as background information on candidates and ballot initiatives in Virginia, which enriched and made WJHL-TV's reports more thorough. Similarly, when voters in Bristol, Virginia went to the polls on May 4, 2004 to fill city council and school board seats, they had had the benefit of a series of WJHL-TV on-air profiles on the candidates to which the *Herald Courier*'s staff had added their expert knowledge.

On election night on these two dates as well as on election night on November 2, 2000, WJHL-TV provided

viewers with continuously updated election information in bottom-of-the-screen crawls as well as cut-ins to prime time programming. In its late night news broadcast, WJHL-TV aired numerous reports from around the area, including from the paper's newsroom with *Herald Courier* reporters presenting wrap-ups on the races that they had been following in-depth. Working together, WJHL-TV and the *Herald Courier* have been able to cover more races in every campaign and election because of the additional resources available through convergence.

In the last few years, WJHL-TV has also provided a great amount of free air time to candidates in various races. For an April 2005 general election, WJHL-TV provided pre-election free air time to candidates running for several seats on the Johnson City Commission and the Washington County, Tennessee School Board. It followed up with full election night on-air and website coverage. Typically, when candidates receive free time, they record statements that air on the station. Following these appearances, WJHL-TV reporters analyze the presentations and present "Truth Tests" examining the accuracies and any inaccuracies included in the statements. WJHL-TV's political and other coverage has also benefited greatly from the fact that, drawing on the resources of Media

General's corporate parent, the station has been able to purchase access to the Associated Press's Electronic News Production System, which offers a wealth of information about elections and news in general.

WJHL-TV, the *Herald Courier*, and Tricities.com also work together to present candidate debates and political specials. During a special election for a Virginia House of Delegates seat early in 2006 which had a very short four-week campaign occasioned by a legislator's sudden departure from office, the *Herald Courier* hosted a candidate debate. As part of their converged efforts, WJHL-TV provided a panelist for this event and provided on-air coverage through reports included in the station's newscasts. Shortly after September 11, 2001, WJHL-TV, with assistance from the *Herald Courier*, presented a special focused on Islam and the Islamic community.

Local News Other special news segments highlight the increased amount of news content and information convergence brings to the DMA. After Hurricane Katrina devastated the Gulf Coast last year and evacuees started heading north on Interstate 81, which runs through the Tri-Cities DMA, the three Media General outlets worked separately and together to ensure that Tri-Cities residents had the maximum information available on the evacuees' food

and shelter needs. At the same time, the three outlets spearheaded a local fundraising drive to allow Tri-Cities residents to make a difference in this unfolding news story.

Similarly, reporters at the three Tri-Cities outlets have covered different angles and perspectives on the rebirth of the coal industry in their region and then worked together to make sure all of the information reached DMA residents. In like fashion, a combined group of newspaper and television reporters traveled to Mississippi to cover the deployment to Iraq of troops drawn from the Tri-Cities area. The broad story would not have been covered as well or as comprehensively if each outlet had proceeded independently; in fact, it might not have been covered at all. Examples of other instances in which the WJHL-TV and *Herald Courier* staffs have teamed up to prepare special reports presented within the station's newscasts are set forth in Tab 2. As shown there, some of these special reports were one-time stories, and some involved continuing coverage. The range of topics they cover is diverse and runs the gamut from uncollected taxes and parking fees to homeland security on the local level to weather technology.

In addition to these special projects, a number of regular features, such as "Education Watch" noted above, achieve wider circulation in the community because of WJHL-TV's cross-ownership with the *Herald Courier*. These features highlight local information, events, and personalities. For example, every weekday evening during the 5:00 p.m. and 6:00 p.m. newscasts, WJHL-TV airs "Medical Watch," which covers health topics in the news in the DMA. In addition to these daily segments, WJHL-TV's "Medical Watch" staff prepares, on a quarterly basis, an in-depth television special on a health-related issue of particular importance. One such recent segment focused on the high incidence of obesity and diabetes in the Tri-Cities area. During the diabetes special, viewers could call in questions to an expert panel; the website had a questionnaire users could complete to evaluate their own condition.

In addition, since 2003, to complement this on-air coverage, the *Herald Courier* has published a monthly "Medical Watch" special insert. The content of this publication picks up and expands on many of the "Medical Watch" television segments. WJHL-TV's "Medical Watch" reporter frequently contributes articles for publication in the *Herald Courier's* "Medical Watch" inserts.

Tricities.com also provides content from both on-air and print versions of "Medical Watch" and other helpful health-related information. These efforts have spurred Media General's competitors to provide more comprehensive local health information. The *Johnson City Press*, the daily newspaper in Johnson City, recently introduced its own free monthly publication addressing health issues. Other specials have featured call-in segments for viewers to learn more about credit reports and scams that target senior citizens. Both topics were followed by live community events.

In addition to specials and regularly televised series, WJHL-TV airs dozens of news stories a month that are made possible in the first instance or made more detailed because of WJHL-TV's collaboration with the *Herald Courier*. As shown by the detailed review of these stories at Tab 3, some involved instances in which the *Herald Courier* staff provided the television station's staff with "tips" on breaking news stories; the station would have otherwise been unaware of these stories. In these cases, WJHL-TV was able to put the stories on the air and get breaking news out to the community long before copies of the *Herald Courier* were delivered the following day. In other instances, *Herald Courier* reporters in locations

where WJHL-TV did not have reporters have provided video for these "tips" and for other ongoing news of local interest.

Community Participation. Media General's converged outlets in the Tri-Cities DMA have not only delivered improved information to the residents of the area but have encouraged those residents to contribute coverage themselves. The Tricities.com website allows viewers to provide feedback and story suggestions and frequently conducts web polls. These suggestions and tips have led to multiple stories ultimately broadcast on WJHL-TV and published in the *Herald Courier*. On a regular basis, viewer-submitted photographs are displayed on-air during WJHL-TV's weather reports, and posted to Tricities.com. The *Herald Courier*'s editorial writer has an online blog, and the newspaper conducts a "readers forum" once a month, at which a dozen residents from a cross-section of the community share thoughts and news ideas. Issues raised by participants in this forum are occasionally relayed to WJHL-TV, which has used them to develop related stories for broadcast on the station.

Weather. Convergence has brought residents of the DMA much improved weather coverage. WJHL-TV's meteorologists provide locally-produced content for inclusion in the

Herald Courier's daily weather page. Without WJHL-TV's input, Bristol area residents would not have such detailed locally-produced information in print. As weather events grow into major local and regional stories, the local presence that convergence has created for WJHL-TV allows much more timely and in-depth coverage to residents throughout the DMA. For instance, in 2004, when forecasters were predicting that Hurricane Ivan would stall over the Tri-Cities area, causing extensive flooding, WJHL-TV aired special reports with emergency workers who provided safety advice. Most recently, to deliver information to residents whenever and wherever weather events happen, the Tricities.com website has begun to offer free weather updates via text messaging to cell phone users who ask for this service; WJHL-TV meteorologists provide the content for these updates. To make sure all viewers are aware of impending weather events, WJHL-TV runs crawls during programming directing viewers to the website, where they can obtain exclusive on-line only weather reports. WJHL-TV also can utilize the tower cameras it has installed at its Bristol and Kingsport bureaus to provide video showing weather conditions in those locations. Finally, the station has also launched a twenty-four hour digital

weather channel with content produced in-house by the station's own staff.

Local Sports. Convergence has also enabled WJHL-TV, the *Herald Courier*, and Tricities.com to deliver significantly enhanced sports coverage. *Herald Courier* sports reporters often provide on-air information, allowing viewers to benefit from their knowledge of local teams and sports. Every Friday night during high school football season, WJHL-TV broadcasts an extended version of its late newscast called "Touchdown Friday Night," which provides viewers across the DMA with scores of dozens of local games. *Herald Courier* and WJHL-TV reporters all phone reports and scores to the station so that WJHL-TV can broadcast scores and stories for many more games than its own staff could cover by themselves. For the third straight season, the *Herald Courier,* in collaboration with WJHL-TV, has also published a printed "Touchdown Friday Night" football guide. The publication, which complements WJHL-TV's weekly television program, provides detailed rosters, schedules and photos for all area high school teams. Acting alone, the newspaper's staff could not have delivered such an in-depth report to the residents of Bristol and southwestern Virginia. In addition, Tri-Cities.com offers videos of Friday night games that exceed

the time limitations of WJHL-TV's Friday night broadcasts. WJHL-TV has also featured sports specials on collegiate playoffs and the "Stateline Classic," a girls' softball tournament in Bristol for high school and college teams.

The Tri-Cities area plays host twice each year -- once in the spring and once in the fall -- to major auto races at the Bristol Motor Speedway. These sporting events have in turn spawned some of the largest community events in the Tri-Cities area, events that occur in conjunction with the races. The Food City Family Race Night attracts between forty and fifty thousand people to downtown Bristol each spring and fall race weekend; a portion of the proceeds from the event go to various area charities and organizations. Before convergence, WJHL-TV provided only brief coverage of the event during its newscasts. Since convergence began, however, WJHL-TV has become an official sponsor of each event and broadcasts live newscasts from the events themselves. Extensive coverage of the event also appears on Tricities.com, offering more detail than can be presented on-air or in the *Herald Courier*.

Journalism Awards. The improved news and community coverage enabled by convergence has been recognized not only by the community, but also through numerous professional journalism awards. Attached at Tab 4 is a

list of awards that WJHL-TV, the *Herald Courier*, and Tricities.com have earned in the last several years.

Community Service. As shown in Tab 5, convergence has also allowed the three outlets to better serve community groups and other organizations in the area, such as the American Red Cross, the American Cancer Society, the March of Dimes, a local diabetes walk, the Barter Theater, and the Hands-On! Regional Children's Museum. In March 2006, for example, the outlets ran a cross-platform promotional and fundraising campaign for the American Red Cross. WJHL-TV hosted a blood drive; the television station, newspaper, and website each promoted the event through advertisements and stories. Tricities.com also served as a portal for collecting on-line donations to the Red Cross. Together, WJHL-TV, the *Herald Courier*, and Tricities.com were able to make this event far more successful than any one outlet could have done alone. Segments within WJHL-TV's newscasts have also been presented to foster community-wide initiatives. These newscasts have highlighted many local initiatives, personalities, and issues, including local tutoring efforts, outstanding teachers, and stresses children sometimes experience in changing schools.

WJHL-TV LOCAL NEWS SCHEDULE

WJHL-TV currently provides the following local news programming, in addition to CBS Network programming:

News Channel 11 Morning Edition: 5:00 a.m. - 7:00 a.m. (Monday-Friday)

Four 3-minute local news/weather cut-ins and six 25-second weather cut-ins during CBS morning programming: 7:00 a.m. - 9:00 a.m. (Monday - Friday)

News Channel 11 at Noon: 12:00 p.m. - 12:30 p.m. (Monday - Friday)

News Channel 11 at 5: 5:00 p.m. - 5:30 p.m. (Monday-Friday)

News Channel 11 at 5:30: 5:30 p.m. - 6:00 p.m. (Monday-Friday)

News Channel 11 at 6: 6:00 p.m. - 6:30 p.m. (Monday-Friday)

News Channel 11 Nightside: 11:00 p.m. - 11:35 p.m. (Monday-Friday)

News Channel 11 Weekend Edition: 6:00 p.m. - 6:30 p.m. (Saturday - Sunday)

News Channel 11 Nightside: 11:00 p.m. - 11:35 p.m. (Saturday - Sunday)

SPECIAL REPORTS JOINTLY PRODUCED
BY WJHL-TV AND THE *BRISTOL HERALD COURIER*

2006

"Kaine Inaugural Gala" - WJHL-TV worked with the *Bristol Herald Courier* to cover different aspects of the pre-inaugural events for Virginia Governor-elect Tim Kaine. WJHL-TV delivered live reports from the gala site in Abingdon, which included on-camera live debrief interviews with a *Courier* reporter covering another angle of the story.

"Tennessee Legislature" - WJHL-TV crews traveled to Nashville and delivered live reports over 3 consecutive days focusing on the issues to be considered by the Tennessee Legislature during their regular and special session. Several of the live reports included debriefs with the *Bristol Herald Courier* reporter covering a separate issue before the Legislature. These WJHL-TV pieces were streamed on tricities.com. Since the stories aired, WJHL-TV has received a request from Tennessee Senator Rusty Crowe for permission to stream WJHL-TV's story on 'Behind the Scenes at the Legislature' on his website because of the positive response he received from constituents.

"DNA Post-Execution Testing" - WJHL-TV worked with the *Bristol Herald Courier* to cover the results of testing ordered in Virginia on a man who had been executed 10 years earlier. WJHL-TV relied on the *Courier's* Kathy Still for background information, as she covered the execution and knew the victim and the convicted. WJHL-TV featured Kathy and her perspective for a live debrief in a 5:30pm newscast.

"Jeanette Carter memorial" - WJHL-TV produced several memorial reports on the passing of Jeanette Carter in late January and the public tributes to her. As part of the coverage, the television station worked with the *Bristol Herald Courier's* feature reporter, Joe Tennis, to research and gather information about the Carter family's significance to the area and the impact of her death. WJHL-TV provided still pictures to the *Courier* from several of the events and posted those images to tricities.com.

"Smoky Mountain Heritage Center" - WJHL-TV features reporter Tim Cable and *Bristol Herald Courier* features reporter Joe Tennis jointly visited and produced pieces on the newest attraction to highlight the Smoky Mountains and its history. WJHL-TV's television piece included a push to Joe's complimentary *Courier*

piece. Images/excerpts from both were posted and featured on tricities.com.

"Troop Return" - WJHL-TV and the *Bristol Herald Courier* worked together on coverage of area troops returning from Iraq. Crews traveled together to Mississippi and presented reports.

"Bristol Race Week" - WJHL-TV, the *Bristol Herald Courier* and Tricities.com delivered strong multimedia content coverage of race week at Bristol Motor Speedway and surrounding events and atmosphere. WJHL-TV produced live newscasts from the Speedway, live newscasts from Family Race Night and a live "Trackside" sports special from multiple locations. WJHL-TV produced and aired stories about the race-week atmosphere, security, new race camping taxes, extreme fans, terrorism warnings and the economic impact. These stories each contained an element of another story gathered and reported by the *Courier*, with additional information and images posted to Tricities.com.

"Online Safety" - WJHL-TV, the *Bristol Herald Courier* and Tricities.com developed and delivered multimedia coverage of online safety for teens and young children. This content centered around methods to keep kids who frequent websites like myspace.com safe from those who also visit the sites as predators. Each platform delivered unique content that complimented and pushed towards the counterparts.

"Kites" - WJHL-TV feature reporter Tim Cable and *Bristol Herald Courier* feature reporter Joe Tennis planned and delivered separate and complimentary stories on 3 retired Virginia coal miners who now make a living making kites near the Mount Rogers National Recreation Area.

"Unpaid Taxes" - WJHL-TV produced a Targeted Special Report on unpaid property taxes and the over 1 million dollars Tri-Cities municipalities could spend if some landowners and businesses would pay up. The *Bristol Herald Courier* delivered a complimentary piece on delinquent tickets and how much its costing the Bristol area to try to recover those funds. Together, these pieces ran under the 'Who's Holding Out?' banner with additional information and delinquent tax lists posted to tricities.com.

"Heart Talk" -- WJHL-TV produced and aired a sixty-minute women's heart health special. Content from this show is used for the February issue of the *Bristol Herald Courier's* Medical Watch publication. "Heart Talk" is a sixty-minute, commercial-free news special on heart health during which two panels of

medical experts in two locations took calls into a phone bank and answered questions submitted through tricities.com on heart health and disease prevention.

2005

"Medical Watch" - in February, WJHL-TV produced a sixty-minute heart health special hosted by Medical Watch report Sara Diamond. Material from the show was used as content for a *Bristol Herald Courier* Medical Watch publication

"Your Tax Dollars, Uncollected" - In February, WJHL-TV and the *Bristol Herald Courier* conducted a joint investigation into unpaid and outstanding taxes, tickets and fines owed to area municipalities and analyzed how much money each area stood to add to its budget if it could simply collect the delinquent amounts. A WJHL-TV reporter, who learned one city was planning a large collection effort for parking fines, initiated the research. WJHL-TV staff researched delinquent fines in areas in Tennessee while a *Bristol Herald Courier* reporter did the same for areas in Virginia. The two then combined their research to develop pieces that aired 2/24/05 and printed 2/25/05 presenting the results.

"How Safe Is Our Homeland?" - In February, WJHL-TV continued an investigation first started by the *Bristol Herald Courier* to identify the recipients of federal homeland security funds in the Tri-Cities. A WJHL-TV reporter analyzed initial data compiled by a *Courier* reporter to determine which areas received the most funding and which received the least. The WJHL-TV reporter then used the information to develop more detail on who was being left out of the funding and what preparedness equipment the area still lacked. The WJHL-TV report aired 2/27/05 and included the *Courier*'s findings, as well as a live explanation of additional background by the *Bristol Herald Courier* reporter.

"Close To Home-Frog Level, Virginia" - One of a series of feature pieces exploring little-known areas of southwest Virginia by WJHL-TV's Tim Cable and a *Bristol Herald Courier* reporter, aired and printed in February.

"Close To Home-Bee, Dickenson County" - One of a series of feature pieces exploring little-known areas of southwest Virginia by WJHL-TV's Tim Cable and a *Bristol Herald Courier* reporter, aired and printed in February.

"Close To Home-Drill, Virginia" - One of a series of feature pieces exploring little-known areas of southwest Virginia by WJHL-TV's Tim Cable and a *Bristol Herald Courier* reporter, aired and printed in February.

2004

"Education Watch: Gangs In Schools" - The *Bristol Herald Courier* and WJHL-TV assigned their respective education beat reporters to conduct an investigation into growing gang crime within multiple school districts in the Tri-Cities DMA. The WJHL-TV reporter's story aired 2/17/04 while the *Bristol Herald Courier*'s report was printed 2/18/04. The reporters each compiled statistics from different school districts. The reporters then compared the information to determine trends within area schools. The WJHL-TV reporter prepared a story that detailed the amount of activity and what type of activity local schools were seeing. The *Bristol Herald Courier* reported on specific cases of gang activity and provided tips for parents and teachers on how to spot gangs as well as how to report suspicions.

"Growing Pains" - This joint project examined the area's evolution and expansion as well as the inconveniences and unexpected issues facing various municipalities as they grow and try to keep up with progress. The WJHL-TV's report aired 2/26/04; reports from several *Bristol Herald Courier* reporters printed as part of its Progress edition on 2/28/04, which was prepared by numerous *Courier* reporters, several of which had decades of experience in covering the Tri-Cities. The station's reporter utilized their expertise to help analyze which areas in the region were growing at such a rate that their infrastructures could not keep up with development. He then visited those areas to prepare a television report on their experiences and their efforts to plan for the future.

"Spring Races at Bristol Motor Speedway" - On 3/27 and 3/28, WJHL-TV and the *Bristol Herald Courier* teamed up to cover the first of two yearly NASCAR race weekends in the Tri-Cities, a time when 500,000 fans converge on the area. The *Bristol Herald Courier* -- as the 'hometown' paper of the track -- covered multiple aspects throughout the week leading up to the races as well as the races themselves. While gathering those pieces, *Courier* photographers routinely shot video for WJHL-TV while print reporters gathered information that could be used in WJHL-TV live newscasts. WJHL-TV prepared additional reports on activities in and around the track, taking video and also snapping still pictures and forwarding them to the *Courier* for

inclusion in its publications. Additionally, WJHL-TV put a "face to the voice" heard for years by race fans with a profile piece on the *Courier*'s David McGee who pulls double-duty as Bristol Motor Speedway's track announcer. WJHL-TV produced "Trackside" specials that featured information and interviews concerning the event. Together, the two outlets maintained a "Race Photos Gallery" on their joint website; a special racing section, including information and images provided by WJHL-TV, was printed and distributed by the *Courier* over the weekend of the races.

"Passion of the Christ" - WJHL-TV and the *Bristol Herald Courier* provided team coverage of the release of the controversial motion picture the Friday of Easter weekend, 4/9/04. Various pieces explored the reaction of churches, the details of the movie, the debate over showing the film, and the reaction of moviegoers in the heart of the Bible belt. Together, material from the *Bristol Herald Courier* and WJHL-TV provided a comprehensive package featured on the joint website, tricities.com. On the night of the film's local release, WJHL-TV and the *Courier* sent reporters and photographers to various theaters and provided information and images to each other about turnout and reaction to the film. Working together, they were able to cover more locations. WJHL-TV aired a comprehensive report, and the *Courier* followed with separate print pieces.

"Big Tom In The Big Apple" - WJHL-TV and the *Bristol Herald Courier* worked together to follow local "Survivor" contestant Tom Buchanan to the finals of "Survivor All Stars" in New York. The work of a *Courier* reporter during Buchanan's previous season on "Survivor" allowed WJHL-TV to bring viewers insight into the competition that would not have been possible without the partnership. The previous year, the *Courier* reporter had visited Buchanan's family weekly and joined them as they watched each episode. His regular columns detailed each family member's reaction as well as that of friends and neighbors. The reporter then introduced WJHL-TV and the Buchanan family when "All Stars" premiered. The WJHL-TV and *Courier* reporters were able to conduct live interviews with the family members and then travel with them to the finale in New York. There, they provided viewers and readers with day-by-day coverage of the finale from different perspectives. The final reports on the trip aired on WJHL-TV on 5/13/04, while *Bristol Herald Courier*'s final report printed on 5/11/04.

"Education Watch: Truancy" - WJHL-TV's education reporter and a *Bristol Herald Courier* reporter teamed up to conduct a joint investigation into the truancy rates in Tri-Cities area school

systems. The WJHL-TV reports aired on 5/6/04, while the *Courier*'s stories printed on 5/7/04. The reporters worked together to collect truancy statistics from a number of area school districts and then evaluate them to determine trends and areas with high truancy rates. The reporters also interviewed various school administrators, law enforcement officials, and judges to determine the amount of money each district spends annually to combat truancy.

"Operation Big Coon Dog" - Beginning 6/24/04 and continuing to today, WJHL-TV and *Bristol Herald Courier* reporters have worked together to cover the arrests and subsequent prosecutions of numerous Buchanan County, Virginia public officials, businessmen, and a federal employee on bribery, conspiracy, racketeering and fraud charges. The joint efforts began with a "tip" to WJHL-TV from a *Courier* reporter that the arrests were taking place. The *Courier* reporter gained the information because of a close working relationship with several judicial sources. The early notification allowed WJHL-TV to have crews in place as the arrestees were booked into jail to get and air video of the surprising turn of events. For the next few months, *Courier* reporters attended the hearings and trials and reported on-air in WJHL-TV's evening newscasts, as events warranted. The *Courier*'s reporters provided WJHL-TV with information on procedural routines and insight gleaned from key players.

"Tri-Cities Endangered History" - WJHL-TV and the *Bristol Herald Courier* worked together on an investigation into Tri-Cities historical sites that were facing potential loss of funding or their preservation status. The WJHL-TV reporter gathered information for sites in the state of Tennessee while the *Courier* reporter gathered information for Virginia. The two then compared their results to determine which sites faced the most immediate danger. They visited the sites with researchers and developed reports profiling the 'forgotten' historic areas of the Tri-Cities region. The print and broadcast reports were disseminated on 7/2/04.

"Fall Races at Bristol Motor Speedway" - The weekend of 8/27 and 8/28/04, WJHL-TV and the *Bristol Herald Courier* teamed up again to provide comprehensive coverage of the year's second NASCAR race weekend in the Tri-Cities DMA. WJHL-TV again produced "Trackside" specials that featured race information and helped maintain the "Race Photos Gallery" on tricities.com. The *Courier* printed a special racing section, including information and images provided by WJHL-TV, and assisted in shooting video for WJHL-TV.

Hurricanes and Tropical Storms - Hurricanes and flooding coverage took center stage three separate times during the third quarter of 2004, providing numerous examples of the benefits of convergence between WJHL-TV and the *Bristol Herald Courier*. Several of the hurricanes that hit Florida in September 2004 brought massive rains to the Tri-Cities DMA. By coordinating coverage efforts, the *Courier* and WJHL-TV were able to fan reporters and photographers across the area to many more locations to report on each storm's effects as it approached and then passed through the area. As the storms moved out, staff members reported from the areas that saw the greatest flooding. Working together, the outlets covered and provided information from many more areas than would have been possible if each outlet acted alone. The *Courier* was also able to tap into the knowledge of WJHL-TV's three certified meteorologists to better predict the storm's paths and impacts. As part of its broadcasts, WJHL-TV aired a number of images taken by *Courier* reporters and photographers, broadening the story it presented to viewers. All information and images were also posted on the joint website.

The area was hardest hit by Ivan the week of 9/13/04. When it became apparent the storm would be hard hitting, WJHL-TV broke format to bring viewers a 30-minute, commercial-free severe weather special titled "Eye On Ivan." That special was streamed live on the joint website. During the 30-minute broadcast, viewers heard from emergency management officials in the studio and at remote locations via satellite, received pre-storm and post-storm tips from the local Red Cross, heard from law enforcement agencies readying to respond to heavy flood waters, and got data on the track of the storm. The *Courier* followed up with stories and information. The *Bristol Herald Courier* and WJHL-TV working together were able to provide more thorough coverage of everything from school closings to road collapses and flooding deaths. Coverage of Ivan's arrival into the Tri-Cities continued into the early morning hours of Friday with continual television updates, rapidly updated images on the web site, and reports in Friday's *Bristol Herald Courier*.

"Education Watch: School Lunches" - WJHL-TV and the *Bristol Herald Courier* conducted a joint investigation into the quality and nutritional value of the lunches being served by Tri-Cities school cafeterias. Initially, the reporters worked together to gather health department records on inspections of each school in the prior year. The reporters then reviewed and analyzed the records to determine which schools made passing grades and which schools had not. The team then consulted various health

officials to report on how the cafeterias selected menus, offered selections, and followed nutritional guidelines. They also visited several cafeterias to determine if students were making nutritional choices and examined how the luncheon fare may or may not be contributing to childhood obesity. The WJHL-TV story aired on 11/9/04, and the *Bristol Herald Courier* story printed on 11/9/04. Working together, the team was able to review more records, consult more officials, and visit more schools.

2003

"Spring Races at Bristol Motor Speedway" - WJHL-TV and the *Bristol Herald Courier* teamed up to provide complete coverage of the events of the NASCAR race weekend on 3/22 and 3/23/03, including production of a "Trackside" television special and printing of a special section in the *Bristol Herald Courier*. WJHL-TV's coverage relied on archives regarding information about significant past events at Bristol Motor speedway.

"Endless Emergency Room Waits" - WJHL-TV conducted an investigation in April 2003 into the amount of time patients must wait for treatment at Tri-Cities area emergency rooms, a story that followed a debate between two local hospital systems over the need for a new hospital in Johnson City. The WJHL-TV reporter spent several nights inside emergency rooms to gather images and information for her report that aired 4/29/03. That report built on information gathered by the *Bristol Herald Courier* concerning Wellmont Health Systems, a company based in Bristol. WJHL-TV provided the *Bristol Herald Courier* with the results of its nights in the emergency room, which provided amplification for a *Courier* report that printed 4/30/03.

"Education Watch: Keeping Qualified Male Teachers" - WJHL-TV and the *Bristol Herald Courier* assigned their respective reporters to research and prepare a story that looked into the difficulties faced by local school districts in trying to maintain a stable percentage of male teachers within Tri-Cities area schools. The WJHL-TV report and the *Bristol Herald Courier* report appeared 5/21/03. They included details from interviews conducted with teachers in several schools and analysis of several education experts. WJHL-TV was able to cover information from more schools and more teachers, particularly in southwest Virginia, than would be possible without the collaboration.

"Fall Races at Bristol Motor Speedway" - The *Bristol Herald Courier* and WJHL-TV together provided viewers and readers with complete coverage of the fall 2003 NASCAR races the weekend of 8/22 and 8/23/03. WJHL-TV's news and sports teams delivered newscasts during a "Trackside" special. A *Bristol Herald Courier* special section, including images gathered by WJHL-TV photographers, was also printed and distributed.

"Made in the Tri" - A WJHL-TV reporter and a reporter from the *Bristol Herald Courier* together researched what companies in the area provide unique products or services to the rest of the country and the world. The *Courier*'s reporter researched companies in Virginia while the WJHL-TV reporter concentrated on companies in Tennessee. They then compiled the information to provide more information than each could have singly gathered. The WJHL-TV reporter's story aired 11/24/03; the *Bristol Herald Courier*'s report printed 11/25/03.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
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
	)	
Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets	)	MM Docket No. 01-317
	)	
Definition of Radio Markets	)	MM Docket No. 00-244

REPLY COMMENTS OF MEDIA GENERAL, INC.

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with consumers' simultaneous review of multiple sources, measures popularity, not availability.

Third, Cooper undercounts sources of news and opinion on many levels. Not only is his likely radio count mistakenly low based on his use of format monikers, but he incorrectly assumes that, just because a station of any type does not offer news, it never presents an opinion. In addition, a single outlet may also present multiple opinions, as any reader of a newspaper's editorial and opinion pages can attest. For the two Media General markets Cooper mentions, the details of his data are not presented; nonetheless, his outlet count appears very low. For instance, for Panama City, Florida, The Center for Public Integrity alone lists 17 licensed television stations, 32 licensed radio stations, and 10 newspapers within 100 miles; for Myrtle Beach-Florence, the Center lists 22 licensed television stations, 40 licensed radio stations, and 11 newspapers within 100 miles.[120]

Availability of outlets is the key, and Cooper's market-specific "studies" offer no reason to defer repeal of the 1975 Rule. Instead, they strongly caution against borrowing tools from one discipline to attempt to make measurements in an entirely different subject area.

C. Contrary to Generalized Concerns, Cross-Owned Properties Do Not Make Drastic Staff Cuts.

The fact that cross-owned properties deliver more news and information creates new opportunities for employees, particularly those that work in television station news rooms. To Media General, convergence has never been merely about achieving cost-savings and budget cutting. Rather, Media General has found that through convergence it can deliver better, faster, deeper news to its communities; increase audiences and ratings;

[120] *See* http://www.publicintegrity.org/telecom/default.aspx.

and, as a result, improve its financial bottom line. Contrary to opponents of repeal of the 1975 Rule,[121] convergence has never been about reducing staff.

As Media General's market-by-market descriptions in its initial comments showed, each of its six convergence stations has increased newsroom employment since convergence began and, in four out of six instances, overall employment has also increased:

- In Tampa, where Media General owns the *Tampa Tribune* and WFLA-TV, as of January 31, 2000, the television station employed 89 persons in its news department and 189 overall. As of December 31, 2005, WFLA-TV had increased these numbers to 91 news employees and 221 employees overall.[122]

- In the Roanoke-Lynchburg, Virginia DMA, where Media General operates two newspapers and WSLS-TV, the station, when Media General acquired it in 1997, had 33 news employees and 86 total employees. At the end of 2005, WSLS-TV's news staff had increased by over 30 percent to 44. During the same period, the station's overall number of employees had increased from 86 to 102.[123]

- In the Tri-Cities, TN/VA DMA, in January 1998, when Media General acquired the *Bristol Herald Courier* and began convergence initiatives with WJHL-TV, the television station had 83 total employees and 30 news department employees. By the end of 2005, Media General had added four employees in the station's news department, and 10 employees overall.[124]

- In August 2000, when Media General acquired the *(Florence, S.C.) Morning News* and commenced convergence efforts, WBTW(TV) had a news department of 36 individuals. As of the end of 2005, Media General had added an additional employee to the department,

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[121] *E.g.* AFL-CIO Comments at 55.

[122] Media General Comments, Vol. 2, Statement of Adam Clayton Powell, III, at Ex. A, p. 3.

[123] *Id.* at Ex. B, p. 5.

[124] *Id.* at Ex. C, p. 5.

bringing the total to 37, while overall employment at the station had decreased slightly.[125]

-- Between the time Media General's convergence initiatives began in August 2000 in the Columbus, Georgia DMA and the end of 2005, Media General increased the size of WRBL(TV)'s news department from 28 to 31. This increase in the size of the station's news department occurred despite a decrease in the overall number of employees at the station.[126]

-- In the Panama City, Florida DMA, where Media General operates WMBB(TV) and the *Jackson County Floridan*, the total number of employees at WMBB(TV) increased from 67 to 70, from the time convergence began in 2000 until the end of 2005. During the same period, the number of employees in WMBB(TV)'s news department increased from 30 to 37.[127]

With these totals, there can be no dispute that opponents' fear-mongering about employee cutbacks is not valid. They fail in their attempt to draw a causal link between cross-ownership and employee reductions.

D. The Efficiencies and Operational Synergies Produced by Newspaper/Broadcast Combinations Cannot Be Fully Achieved Through Joint Ventures.

In 2003, in the course of deciding to repeal the 1975 Rule, the FCC recognized that "[t]he benefits of combined ownership are not likely to be achieved through joint ventures as opposed to combined ownership."[128] No party contested this finding on appeal. Nonetheless, in attempting to get the FCC to reverse its repeal of the 1975 Rule despite its judicial affirmation, opponents once again contend that the FCC need not allow cross-

[125] *Id.* at Ex. D, p. 4.

[126] *Id.* at Ex. E, p. 4.

[127] *Id.* at Ex. F, p. 5.

[128] *2003 Report and Order*, 18 FCC Rcd at 13755-56.

Media General's experience echoes the positive benefits of cross-ownership. Through cross-ownership, for instance, the *Tampa Tribune* has been able to level off circulation declines in key parts of its market. Since convergence began, WFLA-TV in Tampa has added two and one-half hours of local news a week -- thirty additional minutes of news each weekday -- and now offers almost 32 hours of local news per week (31 hours and 55 minutes). Ratings have repeatedly demonstrated that the station is Florida's leading provider of local news. The quantitative evidence is most graphic, however, in Media General's smaller market combinations, where four of its five cross-owned television stations now deliver appreciably more local news and public affairs programming than they were offering prior to convergence.[172] In the one exception among the five, a market in which the television station was already delivering the most local news of all the non-grandfathered stations at the time Media General acquired it, the news total has simply remained the same, although the station has added an additional half-hour of public affairs programming each week. Thus, its overall total of local news and public affairs programming has increased since convergence began, and all five non-grandfathered stations have increased their news and public affairs programming since Media General acquired them.

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[172] The totals are as follows:

Station	Prior to Convergence	Fall 2006	Increase
WSLS(TV) (Roanoke)	17 hrs, 35 mins	22 hrs, 35 mins	5 hrs
WJHL-TV (Tri-Cities)	18 hrs, 47½ mins	26 hrs, 17½ mins	7 hrs, 30 mins
WBTW(TV) (Myrtle Beach)	20 hrs, 30 mins	20 hrs, 30 mins	Constant
WRBL(TV) (Columbus)	16 hrs, 45 mins	21 hrs, 45 mins	5 hrs
WMBB(TV) (Panama City)	20 hrs, 15 mins	20 hrs, 45 mins	30 mins

Media General Comments, Vol. 2, Statement of Adam Clayton Powell, III, at Exhibit A, p. 3 and Tab 1 (WFLA-TV), Exhibit B, p. 5 and Tab 1 (WSLS-TV), Exhibit C, p. 4 and Tab 1 (WJHL-TV), Exhibit D, p. 4 and Tab 1 (WBTW(TV)), Exhibit E, p. 4 and Tab 1 (WRBL(TV)), Exhibit F, p. 4 and Tab 1 (WMBB(TV)).