

BORSARI & PAXSON

ATTORNEYS & COUNSELLORS AT LAW
4000 ALBEMARLE STREET, N.W., SUITE 100
WASHINGTON, D.C. 20016

GEORGE R. BORSARI, JR.
ANNE THOMAS PAXSON

WEBSITE www.baplaw.com
EMAIL bap@baplaw.com

TEL (202) 296-4800
FAX (202) 296-4460

December 6, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
4345 12th Street, S.W.
Washington, DC 20054

Re: Consolidated Application of News
Corporation, The DirecTV Group, Inc., and
Liberty Media Corporation for authority to
Transfer Control (MB Docket No. 07-18)

Dear Ms. Dortch:

The North Dakota Broadcasters (NDB) appreciate DirecTV's bringing to the Commission's attention, in the letter dated November 6, 2007, from DirecTV's attorneys, that EchoStar Communications provides 176 local markets with local into local (LIL) service. EchoStar is serving almost one-half of the markets Direct TV refuses to serve. It is unlikely that EchoStar's provision of service to these markets is unprofitable.

Further, NDB appreciates DirecTV's bringing to the Commission's attention, in the letter filed by DirecTV's attorneys dated October 25, 2007, that it currently uses leased satellite spot beam service from Canadian based satellite operators, suggesting that existing satellites can provide local into local service and that the launching of new satellites is not necessarily required to serve additional markets.

In its earlier submissions in this proceeding, NDB had not used the public information regarding DirecTV's operations, out of concern that DirecTV and its consultant LECG had only used DirecTV-supplied data in their analysis. NDB believed that third party data would be more reliable. Nevertheless, the 10-Q filed with the SEC by DirecTV for the period ended September 30, 2007, makes possible the following comparison with the EchoStar data cited in Hermes' report filed by NDB:

	<u>DiracTV</u>	<u>EchoStar</u>
Average revenue per subscriber	\$76.22	\$66.06

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	<u>DirecTV</u>	<u>EchoStar</u>
Market value of each subscriber (DirecTV as of 11/16/07)	\$2,049	\$1,760
Multiple of cash flow	9.3	7.8
Blended cost of debt financing	6.9%	7%
Fifteen year revenue potential	\$7.7 billion	\$6.7 billion
Increase in DirecTV shareholder value	\$792 million	\$629 million

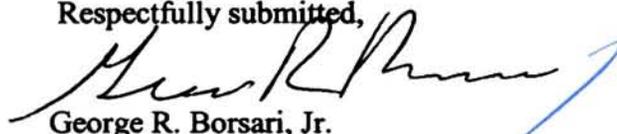
The DirecTV 10-Q also reveals that DirecTV is currently using MPEG-4 technology for distribution of signals to its subscribers.

As detailed in the Hermes report, if a portion of the new subscribers in markets 150+ were to be served by EchoStar, the increase in DirecTV shareholder value referenced in the Hermes report would be reduced. If one-half of this value were lost to competition, the increase in value would still amount to over \$300 million.

DirecTV has repeatedly claimed that it lacks satellite capacity adequate to provide full local into local service (although it should be noted, never by anyone associated with DirecTV with personal knowledge) After gaining subsidies for importation of distant signals, DirecTV offered local into local service in 146 markets, 275 channel line-ups, 70 channels of HD and local into local HD services in 65 markets. Where did the new-found capacity come from? The North Dakota Broadcasters are confident that DirecTV will find the capacity to provide local into local service in all markets and provide HD local into local service in most markets, if the Commission will challenge it to meet their promised goal of providing universal service. DirecTV cannot succeed in claiming that it will be at a competitive disadvantage when it does not provide local into local service to as many markets as does its current competitor.

The North Dakota Broadcasters respectfully renews their request that any approval for the transfer of control of DirecTV be conditioned upon DirecTV's provision of local into local service in all 210 markets by a near-term date certain.

Respectfully submitted,



George R. Borsari, Jr.
Counsel for the North Dakota Broadcasters

cc(via e-mail): Mania Baghdadi
William Beckwith
Jim Bird
Rosemary Harold
Royce Sherlock
Marilyn Simon
Tracy Waldon
Sarah Whitesell