

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
2006 Quadrennial Regulatory Review -)	MB Docket No. 06-121
Review)	
of the Commission's Broadcast Ownership)	
Rules and Other Rules Adopted Pursuant to)	
Section 202 of the Telecommunications Act)	
of 1996)	
)	
2002 Biennial Regulatory Review - Review)	MB Docket No. 02-277
of the Commission's Broadcast Ownership)	
Rules and Other Rules Adopted Pursuant to)	
Section 202 of the Telecommunications Act)	
of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	MB Docket No. 01-235
Newspapers)	
)	
Rules and Policies Concerning Multiple)	MB Docket No. 01-317
Ownership of Radio Broadcast Stations in)	
Local Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244

COMMENTS OF SMALLER MARKET TELEVISION STATIONS

Jonathan D. Blake
Jennifer A. Johnson
Enrique Armijo
Covington & Burling LLP
1201 Pennsylvania Ave. NW
Washington, DC 20004-2401
(202) 662-6000

*Counsel for Coalition of Smaller Market
Television Stations*

December 11, 2007

The Coalition of Smaller Market Television Stations (the “Coalition”), the station groups with 113 television stations in smaller markets listed in Attachment A, respectfully responds to that portion of Chairman Martin’s November 13 proposal that would “make no changes to the other media ownership rules currently under review.”¹ The Coalition would not object to the Commission’s temporarily putting aside consideration of the duopoly rule while it deals with the newspaper/television cross-ownership rule. But that is not the proposal under consideration. Under the Commission’s proposal, it would find that the duopoly rule continues to serve the public interest. That conclusion would be contrary to law and the factual record in this proceeding, and would sacrifice the interests of the public that smaller-market television stations serve.

A Commission decision to retain the duopoly rule in its present form without a specific finding — supported by the record — that doing so is in the public interest would be inconsistent with the Commission’s mandate under § 202(h) of the 1996 Telecommunications Act and with its obligation to comply with the D.C. Circuit’s *Sinclair v. FCC* remand.² When the Commission undertakes the review of the record evidence regarding the duopoly rule that the law requires, it must conclude that the rule harms its policy goals in smaller markets. The record shows that the economic viability of smaller market television stations is often fragile and deteriorating, and

¹ Public Notice, “Chairman Kevin J. Martin Proposes Revision to the Newspaper/Broadcast Cross-Ownership Rule” MB Docket No. 06-121 (rel. Nov. 13, 2007), at 1 [herein “Public Notice”]. *See also id.* at 2 (“[Chairman Martin] proposes to make no changes to the local television ‘duopoly’ rule.”). As the Public Notice makes clear, the Chairman invited public comment on *all* of his proposals, including those that proposed the Commission make no further changes to the ownership rules in this quadrennial review.

² *Sinclair v. FCC*, 284 F.3d 148 (D.C. Cir. 2002).

therefore all three goals of the duopoly rule — promoting diversity, localism, and competition — would be served, not harmed, by the Commission’s reforming the rule in recognition of the drastically changed media marketplace.

I. THE COMMISSION’S RETENTION OF THE DUOPOLY RULE WITHOUT FULLY JUSTIFYING THAT IT REMAINS IN THE PUBLIC INTEREST WOULD VIOLATE § 202(H) OF THE 1996 TELECOMMUNICATIONS ACT.

Section 202(h) of the Telecommunications Act states that the Commission “*shall* review ... *all* of its ownership rules quadrennially as part of its regulatory reform review.”³ Section 202(h) also requires that the Commission “repeal or modify *any* regulation it determines to be no longer be in the public interest.”⁴ In short, under the statute, the necessary predicate for the retention, repeal, or modification of any ownership rule is determining whether such rule is still in the public interest. But the statute commands the Commission to undertake this public interest review of *all* of its rules during a quadrennial media ownership review. A piecemeal, single-rule quadrennial review would be contrary to law.⁵

This reading is not just supported by the plain language of the text; it is also consistent with both the Third and D.C. Circuits’ interpretations of § 202(h). In discussing the Commission’s statutory obligations, the *Prometheus* Court noted that “Section 202(h) requires the Commission periodically to justify its existing regulations, an obligation it would not otherwise have. ... If [a regulation is no longer deemed useful], it must be vacated or modified.”⁶

³ Telecommunications Act, § 202(h) (emphasis added).

⁴ *Id.* (emphasis added).

⁵ As noted above, the Coalition does not object to the Commission’s acting on the multiple ownership rules in stages.

⁶ *Prometheus*, 373 F.3d 372, 395 (3d Cir. 2004); *see also id.* (“In a periodic review under § 202(h), the Commission is required to determine whether its then-extant rules remain useful in the public interest; if no longer useful, they must be repealed or modified. *Yet no matter what* (continued...)”)

Likewise, the D.C. Circuit's *Sinclair* and *Fox* decisions characterized § 202(h) as "Congress's instruction that the Commission review *each* of its ownership rules every two [now four] years[,] 'which the court characterized as designed to continue the process of deregulation.'"⁷ Under both the Third and D.C. Circuits' interpretations of § 202(h), a failure to find that the duopoly rule remains "in the public interest" would violate the Communications Act's mandate. Therefore, § 202(h)'s public interest determination is necessary for *each* of the Commission's rules, even those it "proposes to make no changes to."⁸

II. THE COMMISSION'S RETENTION OF THE DUOPOLY RULE IN ITS PRESENT FORM WOULD CONTRAVENE THE CLEAR REMAND INSTRUCTIONS OF THE *SINCLAIR* COURT.

The *Sinclair* Court held that the Commission must affirmatively find that the Commission's local television ownership rule continues to serve the public interest based on a carefully developed proceeding record. That is exactly what it appears the Commission is poised not to do. It seems prepared to reach a decision in the face of a record that, far from supporting such a decision, demonstrates that the duopoly rule must be modernized.

Court review has also already found the duopoly rule in its present form to be fundamentally flawed, and it therefore cannot be retained as part of the present statutorily-mandated review on the basis of the sort of summary treatment proposed in the November 13 *Notice*. Concluding that the duopoly rule should not be changed would directly contravene the *Sinclair* Court's holding that "the definition of 'voices' in the local [television] ownership rule is

the Commission decides to do to any particular rule ... it must do so in the public interest and support its decision with a reasoned analysis.") (emphasis added).

⁷ *Sinclair*, 284 F.3d at 159 (quoting *Fox TV Stations*, 280 F.3d 1027, 1033 (D.C. Cir. 2002)) (emphasis added).

⁸ Public Notice at 2.

arbitrary and capricious.”⁹ The Court also held that the Commission would expressly have to “demonstrate that its exclusion of non-broadcast media from the eight voices exception is ‘necessary in the public interest’ under § 202(h).”¹⁰

The duopoly rule’s core legal flaw — and the flaw that the *Sinclair* Court remanded to the Commission to address — was that the “Commission never explain[ed] why diversity and competition [from non-broadcast voices] should not also be reflected in its definition of ‘voices’ for the local ownership rule.”¹¹ The *Sinclair* Court noted the “evidentiary gap” in the record supporting the Commission’s decision to limit the rule to only television stations. This “gap” has broadened in the present quadrennial review proceeding, not narrowed.

III. THE RECORD IN THIS PROCEEDING SHOWS THAT RETAINING THE PRESENT DUOPOLY RULE IS NOT IN THE PUBLIC INTEREST IN SMALLER MARKETS.

A. The Present Duopoly Rule Does Not Adequately Evaluate Diversity In Smaller Markets.

The record in this quadrennial proceeding shows that it is simply not possible for the Commission to conclude that a rule that considers only television stations as diversity sources in smaller markets reflects today’s media landscape.

1. Non-broadcast Outlets Contribute to Local Diversity.

⁹ *Sinclair*, 284 F.3d at 169. In holding that “resolution of Sinclair’s challenge to the Commission’s definition of ‘voices’ requires that the rule be remanded to the Commission,” the Court offered the Commission an assist by also stating that “[o]n remand the Commission conceivably may determine to adjust not only the definition of ‘voices’ but also the numerical limit.” *Id.* at 162. Given the record in this proceeding, the Commission ignores this advice at its own legal risk.

¹⁰ *Id.*

¹¹ *Id.* at 164.

The Commission's Study No. 1 shows that the Internet unquestionably contributes to both local diversity and localism. The study shows the Internet to be an established source of local news; over one-fifth of respondents cited it as their first or second most important source for local news.¹² Moreover, it is *access* to an idea, rather than the *popularity* of those ideas as represented through an outlet's audience share, that should be the Commission's guiding principle in determining whether a particular outlet contributes to diversity.¹³ So long as an outlet meaningfully contributes to the marketplace of ideas on the local level, it must be considered as part of the Commission's diversity calculus.

The well-practiced response to this fact is that the Internet merely replicates or aggregates local information already available through the more conventional media, and it should not count as a separate "outlet" for diversity purposes. The record demonstrates that this response is wrong. Numerous websites dedicate themselves to local and even "hyperlocal" coverage, offering "unique information about or perspectives concerning community issues," and even the

¹² FCC Study No. 1 at Tables 35 & 36. The Study's findings are overwhelmingly supported by academic research on the subject. *See* Pew Internet & American Life Project, "Online News: For Many Home Broadband Users, the Internet is a Primary News Source" (rel. Mar. 22, 2006), at 3 (finding 59% of respondents used the Internet for local news "yesterday"); Harvard University Kennedy School of Government, Joan Shorenstein Center on the Press, Politics and Public Policy, "Young People and News" (rel. July 2007), at 11 (finding a fifth of respondents claimed to get news from the Internet on a daily basis) and "Creative Destruction: An Exploratory Look at News on the Internet" (rel. Aug. 2007), at 12 (finding that "many cities and towns have community-centered [web]sites," that some of these sites "include news" and "compet[e] with local news outlets for residents' attention," and that "traffic to these sites increased during the year ending April 2007 [by] 14 percent").

¹³ *See* Coalition Reply Comments, MB Docket No. 06-121 (filed Jan. 16, 2007), at 9 ("[T]he fact that certain viewpoints may reflect popular opinion or have widespread appeal is not a ground for government intervention in the marketplace of ideas. Indeed, the very notion of a marketplace of ideas presupposes that some ideas will attract a following and achieve wide currency, while others quietly recede having failed to conquer the hearts and minds of the citizenry.") (quoting Report and Order, *In the Matter of 2006 Quadrennial Ownership Review*, MB Docket No. 06-121 (rel. July 2, 2003), ¶ 352) [herein "2003 Ownership Order"].

websites of newspaper publishers and broadcasters “greatly differentiate, supplement, and constantly update the information they disseminate to their audiences via the web.”¹⁴ Traditional media outlets constantly rely on online sources to break and further develop local news, and independent blogs cover local issues with a depth and breadth that at times surpasses even that of the most established beat reporters.¹⁵

In its 1999 adoption of a rule that “focuses only on the number of full-power broadcast television outlets in the market,” the Commission noted that it was “unable to reach a definitive conclusion at this time as to the extent to which other media serve as readily available substitutes for broadcast television.”¹⁶ As the record demonstrates, in 2007 there is no question that non-broadcast outlets contribute to local diversity and that these outlets serve as “readily available substitutes” to broadcast television. Accordingly, it would be arbitrary and capricious to retain the present duopoly rule which looks only to local television stations to assess diversity.

2. *The Present Rule’s Measure of Diversity is Also Fundamentally Flawed.*

Because the *Sinclair* Court held that the duopoly rule’s consideration of only television stations for diversity purposes was without rational support, it decided to “leave for another day any conclusion regarding the Commission’s choice of eight” stations for determining whether

¹⁴ Gannett Comments, MB Docket No. 06-121 (filed Oct. 23, 2006), at 19.

¹⁵ See Jonathan Abrams, “Pique, Critique — Blogs Do It All,” L.A. Times, at B1 (detailing blogger’s efforts that resulted in a recall effort against two city council members in San Bernardino County, as well as other citizen journalism efforts by bloggers throughout Southern California). As Chief Judge Scirica noted in his partial dissent in *Prometheus*, “the record contains a significant number of websites for local government bodies and civic organizations,” and “Internet news sites have sprouted specifically to provide independent, local news.” *Prometheus*, 373 F.3d at 466 (Scirica, C.J., dissenting in part and concurring in part); see also *id.*, notes 119-20 and accompanying text (offering examples from the record).

¹⁶ Report & Order, *In the Matter of Review of the Commission’s Regulations Governing Television Broadcasting*, 14 F.C.C. Rcd. 12,903 ¶ 69 (1999).

there is adequate diversity in any given television market.¹⁷ Section 202(h), however, precludes the Commission from “leaving for another day” its determination of whether the “choice of eight” is supported by the record and serves the public interest. It cannot decide to perpetuate the eight-voice test without the thoroughgoing analysis required by the quadrennial review process, which it seems prepared to short-circuit.

The rule’s unspoken and self-evidently indefensible premise is that all markets, regardless of size, need eight independent television voices for diversity purposes.¹⁸ There is simply no evidence in this proceeding, or anywhere else, for the proposition that New York City (DMA #1) and Spokane, Washington (DMA # 79) both need a minimum of eight independent television stations to adequately ensure diversity in those markets.¹⁹ Larger markets have greater diversity needs than smaller markets. The Commission’s local television ownership rule must recognize this unavoidable fact, and the present rule does not do so.²⁰

¹⁷ *Sinclair*, 284 F.3d at 162.

¹⁸ The assumption underlying the competitive benefits of the “top four” component of the rule — that there is a natural division between the fourth- and fifth-ranked stations in terms of ratings, and therefore barring mergers among those stations will prevent excessive market concentration — has been discredited in this proceeding. Justifying the top four restriction on diversity grounds by claiming there is a similar cut-off in terms of the top four stations’ increased likelihood to air news than the stations ranked below them is similarly unfounded. *See* Hearst-Argyle Comments, MB Docket No. 06-121 (filed Oct. 23, 2006), at 38-46; NAB Comments, MB Docket No. 06-121 (filed Oct. 23, 2006), at 102-06.

¹⁹ Coalition Reply Comments, *supra* note 13, at 10.

²⁰ The radio ownership rule, which determines the number of radio stations one entity may own on the total number of stations in that market, and the radio/television cross-ownership rule, which determines the number of radio and television stations one entity may own on the number of “voices” remaining after the merger, are both consistent with this principle. *See* Telecommunications Act § 201(b)(1) (radio rule); 47 C.F.R. § 73.3555(c) (radio/TV rule). The Commission initially considered a similar structure for local television ownership, but apparently abandoned the idea. *See* Notice of Proposed Rulemaking, *In the Matter of Review of the Commission’s Regulations Governing Television Broadcasting*, 7 F.C.C. Rcd. 4111 ¶ 20 (1992) (“[S]hould the number of [television] stations in a market that one entity is allowed to own be staggered according to the total number of stations in the market?”). It also rejected adopting a (continued...)

B. Broadcasters In Smaller Markets Need Duopoly Relief Because Of Increasing Economic Vulnerability.

The Commission has previously recognized that “the ability of local stations to compete successfully” has been “meaningfully (and negatively) affected in mid-sized and smaller markets,” because “small market stations are competing for disproportionately smaller revenues than stations in larger markets.”²¹ In its earlier pleadings, the Coalition supported the Commission’s conclusion by detailing the financial straits broadcasters face in smaller markets.²² There is simply no credible evidence rebutting the fact that liberalizing the duopoly rule would lead to more viable smaller market television service and, therefore, generally to more localized, diverse and competitive service to the public.

In its thousands of pages of pleadings, Consumers Union never responds to the fact that because local news and public affairs programming is expensive to produce, “financial weakness leads to a reduction or elimination of localized service to the communities served by smaller

“sliding scale” based on market size on reconsideration, holding that a “diversity ‘floor’ of eight stations serve[d] its competition and diversity goals” because it “d[id] not believe that certain populations should have more or less competition and diversity than other populations.” Memorandum Opinion & Second Order on Reconsideration, *In the Matter of Review of the Commission’s Regulations Governing Television Broadcasting*, 16 F.C.C. Rcd. 1067 ¶ 15 (2002). In truly arbitrary fashion, the duopoly rule fails to provide for differences in smaller and medium-size markets, while the radio rules do.

²¹ 2003 Ownership Order ¶ 201.

²² See generally Coalition Comments (filed Oct. 23, 2006) and Reply Comments, MB Docket No. 06-121; see also NAB Comments, MB Docket No. 06-121 (filed Oct. 23, 2006), at 87-110; NAB Reply Comments, MB Docket No. 06-121 (filed Jan. 16, 2007). Subsequent filings in the docket have demonstrated that the trend is only worsening. See NAB *Ex Parte*, MB Docket No. 06-121 (filed Sept. 25, 2007) (noting that half of stations in markets ranked 176 or higher reported actual losses in excess of \$98,789 in 2005, and 25% of those stations reported actual losses in excess of \$557,251).

market stations.”²³ There is no better proof of financial hardship in smaller markets than the numerous stations that have cut back or eliminated local news programming under the present duopoly rule. Without duopoly relief, this trend will only continue.

C. Duopolies in Smaller Markets Contribute to Localism.

Building on evidence amassed during the Commission’s last comprehensive ownership review²⁴ and on the *Prometheus* Court’s finding that local station combinations serve localism,²⁵ the record in this proceeding is replete with both empirical data supporting the principle that duopolies lead to more local news²⁶ and specific examples of improved local service resulting from intramarket television station combinations.²⁷ The facts show that where television stations combine, increased revenues result in improved local service.²⁸

²³ Coalition Comments, *supra* note 23, at 9 (noting that KTKA-TV’s third-ranked station in Topeka shut down its nightly newscast from 2002 to 2006, and WPXT in Portland, Maine dropped its local news programming because of its inability to pay production costs).

²⁴ *Id.* at 10-12 (citing comments at note 19).

²⁵ *Prometheus*, 373 F.3d at 415 (supporting conclusion that “[c]onsolidation can improve local programming”).

²⁶ *See, e.g.*, Belo Comments, MB Docket No. 06-121 (filed Oct. 23, 2006), at 22-26.

²⁷ *See* FCC Study No. 4.1, Daniel Shiman, “The Impact of Ownership Structure on Television Stations’ News and Public Affairs Programming,” at 21 (“[H]aving co-owned stations in the same market, which is sometimes referred to as duopoly status, has a large, positive, statistically significant impact on the quantity of news programming.”); NAB Comments at Attachment H: BIA Financial Network, “Economic Viability of Local Television Stations in Duopolies (Oct. 23, 2006); Coalition Broadcasters, MB Docket No. 02-277 at Attachment A: BIA Financial Network, “Television Local Marketing Agreements and Local Duopolies: Do They Generate New Competition and Diversity?” (Jan. 2, 2003).

²⁸ Even Consumers Union concludes that duopolies lead to more localism, but it attempts to write around its own conclusions. *See* Consumers Union Comments, MB Docket No. 06-121 (filed Oct. 22, 2007), at 98 (“While the positive coefficients indicate that duopolies may lead to more local news and public affairs, this effect is offset by the negative impact on output through increased concentration.”).

As the Coalition has demonstrated, station combinations have allowed formerly struggling stations across the country to invest more in local programming, provide more technologically advanced services, and increased local news coverage.²⁹ But because of the present structure of the duopoly rule, these same benefits are unavailable to viewers in smaller markets. There is no justification for allowing duopolies in 56 large markets, but retaining a rule that bars them in 154 small markets where the need for them is greatest.

Respectfully submitted,

/s/ Jonathan D. Blake

Jonathan D. Blake

Jennifer A. Johnson

Enrique Armijo

Covington & Burling LLP

1201 Pennsylvania Ave. NW

Washington, DC 20004-2401

(202) 662-6000

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²⁹ Experts have recognized the public interest benefits of local media entities' mergers in other contexts as well. See John Lavine, Dean, Medill School of Journalism, Northwestern University, "Localism, Diversity, and Media Ownership": Testimony before the Senate Commerce Committee (Nov. 8, 2007) (demonstrating public interest benefits of cross-owned newspapers and television stations in terms of "more and better local news and public affairs programming").

ATTACHMENT A:
Coalition of Smaller Market Television Stations

Barrington Broadcasting Group

K. James Yager, Chief Executive Officer

WEYI-TV, Saginaw, MI
WBSF, Bay City, MI
WSTM-TV, Syracuse, NY
WACH, Columbia, SC
KGBT-TV, Harlingen, TX
KXRM-TV, Colorado Springs, CO
WPDE-TV/WWMB, Florence, SC
WPBN-TV, Traverse City, MI
WTOM-TV, Cheboygan, MI
WHOI, Peoria, IL
KVII-TV, Amarillo, TX
KRCG, Jefferson City, MO
WFXL, Albany, GA
KHQA-TV, Hannibal, MO
WLUC-TV, Marquette, MI
KTVO, Kirksville, MO

Cordillera Communications

Terry Hurley, President

WLEX-TV, Lexington, KY
KVOA-TV, Tucson, AZ
KOAA-TV, Pueblo, CO
KSBY, San Luis Obispo, CA
KATC, Lafayette, LA
KRIS-TV, Corpus Christi, TX
KPAX-TV, Missoula, MT
KTVQ, Billings, MT
KRTV, Great Falls, MT
KXLF-TV, Butte, MT

Fisher Communications, Inc.

Joseph L. Lovejoy, CFA, Vice President, Strategic Planning & Development

KLEW-TV, Lewiston, ID
KBCI-TV, Boise, ID
KVAL-TV, Eugene, OR
KCBY-TV, Coos Bay, OR*
KPIC, Roseburg, OR*
KEPR-TV, Pasco, WA*

KIMA-TV, Yakima, WA
KIDK, Idaho Falls, ID

Freedom Broadcasting, Inc.

Doreen Wade, President

WLNE-TV, New Bedford, MA
WRGB, Schenectady, NY
WTVG, Chattanooga, TN
WLAJ, Lansing, MI
KFDM, Beaumont, TX
KTVL, Medford, OR

LIN Television Corp.

Vincent L. Sadusky, President & Chief Executive Officer

WPRI-TV, Providence, RI
KXAN-TV, Austin, TX
KXAM-TV, Llano, TX
WDTN, Dayton, OH
WALA-TV, Mobile, AL
WBPG, Gulf Shores, AL
WLUK-TV, Green Bay, WI
WUPW, Toledo, OH
WAND, Decatur, IL
WANE-TV, Fort Wayne, IN
WTHI-TV, Terre Haute, IN
WLFI-TV, Lafayette, IN

Morgan Murphy Stations

Elizabeth Murphy Burns, President

KXLY-TV, Spokane, WA
WISC-TV, Madison, WI
KAPP, Yakima, WA
KVEW, Kennewick, WA
WKBT, La Crosse, WI

Quincy Newspapers, Inc.

Ralph M. Oakley, Vice President & Chief Operating Officer

WKOW-TV, Madison, WI
WSJV, Elkhart, IN
KWWL, Waterloo, IA
WXOW-TV, La Crosse, WI
WQOW-TV, Eau Claire, WI*

WREX-TV, Rockford, IL
WAOW-TV, Wausau, WI
WYOW, Eagle River, WI*
KTIV, Sioux City, IA
WVVA, Bluefield, WV
KTTC, Rochester, MN
WGEM-TV, Quincy, IL

Raycom Media, Inc.

Paul McTear, President & Chief Executive Officer

WTNZ, Knoxville, TN
WTVR-TV, Richmond, VA
WTOL, Toledo, OH
KOLD-TV, Tucson, AZ
KHNL, Honolulu, HI
KHBC-TV, Hilo, HI*
KOGG, Wailuku, HI*
KFVE, Honolulu, HI
KFVS-TV, Cape Girardeau, MO
KSLA-TV, Shreveport, LA
WIS, Columbia, SC
WAFF, Huntsville, AL
WLBT, Jackson, MS
WAFB, Baton Rouge, LA
WBXH-CA, Baton Rouge, LA
WTOC-TV, Savannah, GA
WFIE, Evansville, IN
KLTV, Tyler, TX
KTRE, Lufkin, TX*
WSFA, Montgomery, AL
WTVM, Columbus, GA
WECT, Wilmington, NC
KCBD, Lubbock, TX
WALB, Albany, GA
WPGX, Panama City, FL
WLOX, Biloxi, MS
WDAM-TV, Hattiesburg, MS
WDFX-TV, Dothan, AL
KPLC, Lake Charles, LA
KAIT, Jonesboro, AR

Drewry Communications

Larry Patton, Senior Vice President of Broadcasting

KXXV, Waco, TX

KFDA-TV, Amarillo, TX
KSWO-TV, Lawton, KS
KWES-TV, Odessa, TX
KWAB-TV, Big Spring, TX*

Schurz Communications, Inc.

Franklin D. Schurz, Jr., Chief Executive Officer

WDBJ, Roanoke, VA
KYTV, Springfield, MO
WSBT-TV, South Bend, IN
WAGT, Augusta, GA
KWCH-TV, Wichita-Hutchinson, KS
KBSD-TV, Ensign, KS*
KBSH-TV, Hays, KS*
KBSL-TV, Goodland, KS*

* satellite station