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December 14, 2007

The Honorable Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: MB Docket No. 06-121

Dear Mr. Chairman:

On behalf of Schurz Communications, Inc. (Schurz), this letter will express Schurz' agreement with comments filed by the National Association of Broadcasters in the above-referenced docket on December 11, 2007, with respect to the newspaper-broadcast cross-ownership and the local television ownership rules. *See* Comments of the National Association of Broadcasters, MB Docket No. 06-121 (filed Dec. 11, 2007).

Like NAB, Schurz believes that the record in this proceeding, and the Commission's previous proceedings looking at the newspaper-broadcast cross-ownership rule dating back to 1996, demand that the Commission repeal the rule in its entirety, and certainly support more than the very limited deregulation you have proposed. Schurz operates a grandfathered newspaper-television-radio combination in South Bend, Indiana. As recently as last week, Ranking Member Upton of the House Telecommunications and the Internet Subcommittee told you during an oversight hearing that Schurz' co-ownership of stations in South Bend had allowed both the newspaper and the broadcast stations to improve their service in South Bend. That is absolutely the case, and the Commission should no longer restrict newspaper publishers' ability to operate broadcast stations in their communities.

Schurz also is the licensee of television stations in five different television markets. In some of these markets, it has the leading station; in others it has struggled as competition for local television stations had increased. The Commission in 1999 allowed stations in larger markets to be co-owned and the record of those stations shows that more efficient ownership has translated into improved service to the public. The need for increased opportunities to own more

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than one station in a market is even greater in medium and smaller markets where combined ownership is now not typically possible under the Commission's rules. Schurz urges the Commission, therefore, to modify its local television ownership rule to permit duopolies in medium and small television markets, including co-ownership of top-four stations.

At next week's meeting, the Commission will also consider further measures dealing with broadcast localism. Stations that are struggling to survive economically face ever-greater difficulties in providing vibrant local service; reforming the Commission's local ownership rules would be a far more effective step the Commission could take to improve local television.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jack N. Goodman". The signature is fluid and cursive, with the first name "Jack" being particularly prominent.

Jack N. Goodman

cc: The Honorable Michael J. Copps  
The Honorable Jonathan S. Adelstein  
The Honorable Deborah Taylor Tate  
The Honorable Robert M. McDowell  
Secretary