

December 14, 2007

**VIA ELECTRONIC FILING**

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

**Re: MB Docket Nos. 06-121, 02-277, 01-235, 01-317, and 00-244**

Dear Ms. Dortch:

On behalf of The Gazette Company (“Gazette”), I am writing to express my concerns about Chairman Martin’s November 13, 2007 proposed revision to the newspaper/broadcast cross-ownership ban.<sup>1</sup> In particular, Gazette strongly agrees with the Comments that the Newspaper Association of America recently filed with respect to this proposal.<sup>2</sup> While any action that the Commission may take to finally relax this long outdated and counterproductive restriction must be viewed as a step in the right direction, the Chairman’s recent proposal would provide only a modicum of the regulatory relief that is fully justified in this proceeding. Most importantly, this proposal would provide no assurance of any regulatory relief in media markets outside of the Top 20, despite the strong record evidence that newspaper cross-ownership benefits consumers in smaller markets and that regulatory relief is acutely needed in these markets.

The Gazette Company is the parent of Gazette Communications, Inc., the publisher of *The Gazette* in Cedar Rapids, Iowa, and The Gazette Company is also the parent of the licensee of KCRG-TV in Cedar Rapids, Iowa, which is part of the nation’s 89<sup>th</sup> largest television market. As has been explained in prior rounds of these proceedings, this grandfathered newspaper/broadcast combination has a long history of outstanding and locally oriented community service.<sup>3</sup> Gazette’s Cedar Rapids daily newspaper and TV

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<sup>1</sup> See *Chairman Kevin J. Martin Proposes Revision to the Newspaper/Broadcast Cross-Ownership Rule*, News Release, MB Docket No. 06-121 (rel. Nov. 13, 2007) (“*Chairman’s Proposal*”).

<sup>2</sup> See Comments of the Newspaper Association of America on Kevin J. Martin’s Proposed Revision to the Newspaper/Broadcast Cross-Ownership Rule, MB Docket Nos. 06-121, *et al.* (filed Dec. 11, 2007) (“NAA December 2007 Comments”).

<sup>3</sup> See Comments of the Newspaper Association of America, MB Docket No. 01-235, at 20-21 (Dec. 3, 2001).

station often draw on one another's resources in a manner that has enabled each outlet to better serve its local audience by offering more and higher quality local news and information than otherwise would be feasible. The record in this proceeding is replete with examples of other newspaper/broadcast combinations that likewise have enhanced the Commission's localism objectives without posing a threat to either viewpoint diversity or competition.<sup>4</sup>

Accordingly, the Gazette strongly believes that similar benefits should be available in all local communities and that any action that the FCC takes in this proceeding must provide concrete regulatory relief in medium-sized and small markets. It has been well documented that, in many such markets, the nation's daily newspapers are struggling and broadcast news is becoming a scarcer commodity as the cost of producing news escalates, media choices increase, and audiences get smaller.<sup>5</sup>

For these reasons, Gazette respectfully submits that full repeal of the newspaper/broadcast cross-ownership ban would be fully justified in this proceeding. Short of such action, the Chairman's proposal must be significantly modified to assure cross-ownership relief in a much larger number of markets.

Respectfully submitted,



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Chuck Peters, President  
The Gazette Company

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<sup>4</sup> *See, e.g.*, Comments of the Newspaper Association of America, MB Docket Nos. 06-121, et al, at 66-79 (filed Oct. 23, 2006).

<sup>5</sup> *See, e.g.*, NAA December 2007 Comments at 11-12; Reply Comments of the Newspaper Association of America, MB Docket Nos. 06-121, et al., at 8-13 (filed Jan. 16, 2007).