



SIDLEY AUSTIN LLP
1501 K STREET, N.W.
WASHINGTON, D.C. 20005
(202) 736 8000
(202) 736 8711 FAX

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jtatel@sidley.com
(202) 736-8038

FOUNDED 1866

December 11, 2007

By Hand Delivery

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

FILED/ACCEPTED

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Federal Communications Commission
Office of the Secretary

Re: *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, MB Docket No. 01-235
Shareholders of Tribune Company, MB Docket 07-119

Dear Ms. Dortch:

Attached please find an original and four copies of a letter from Ward L. Quaal to be submitted in the above-referenced dockets.

Please contact the undersigned with any questions.

Sincerely,

Jennifer Tatel

Attachment

The Ward L. Duval Company
P.O. Box 336
Winnetka, Illinois 60093

Ward L. Duval
President

December 3, 2007

Telephone
847/446-4697
Fax
847/446-4579

The Honorable Kevin J. Martin
Chairman
The Federal Communications Commission
445-12th Street, S.W.
Washington, D.C. 20554

Re: Tribune Company

Dear Mr. Chairman:

While I feel it is presumptuous of me to write, I do so in view of my more than sixty years at Tribune Company, ranging from being a summer vacation radio announcer to being named President and General Manager of WGN Continental Broadcasting.

I am prompted to write to stress that WGN Radio is not just another broadcast property. It is a working partner of WGN Television and it is a genuine pioneer in the broadcasting profession rather than a recent acquisition of Tribune Company.

WGN Radio, from its infancy in 1924, to the present, has shown the way to programming leadership and superiority.

Starting as a Zenith station in 1921, with facilities at the Edgewater Beach Hotel, it was to become operative in 1924 from Chicago's Drake Hotel under Tribune ownership.

Zenith had made a considerable contribution to the then developing new "art," but the Tribune Company saw the potential for meeting the needs of the public by developing a broader program schedule, including a huge number of remote originations of events truly meaningful to listeners in Greater Chicago and elsewhere throughout mid-America.

Colonel McCormick as Editor and Publisher of the Tribune called for coverage of the Cubs and White Sox, football at Notre Dame and other major colleges and universities. He started to plan World Series coverage; in addition, he saw such major events as the Jack Dempsey-Gene Tunney championship fight at Soldier Field (1927) and concerts by the Chicago Symphony Orchestra and other distinguished musical groups. Later, he was to ask the staff to originate dance band programs from such entertainment centers as the

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Aragon and Trianon Ballrooms, the Palmer House Empire Room, the Walnut Room of the Bismarck Hotel and the popular Blackhawk Restaurant, among others.

In a more serious category, he called for coverage of the Thomas Scopes Trial on "evolution" from Dayton, Tennessee.

A by-product of the development of WGN was the number of radio programs of national origination from Chicago. Indeed, at that time Chicago was the "capital" of radio with all types of programming, including daily dramatic presentation of love stories and experiences along life's highway.

These programs largely were for women and were called "soap operas," programs such as "Ma Perkins," "Hearts in Harmony," and a dozen more daily serials over WGN, NBC and CBS. Chicago at that time was the location of the top talent of men and women in radio.

WGN Radio was the pacesetter in the development of all local live programming, in addition to the women-oriented serials. Children's programs like "Little Orphan Annie" and other program vehicles for youngsters originated on WGN.

The WGN Concert Orchestra of more than ninety persons, directed by Henry G. Weber, led the way in concert music for radio in the entire nation.

The series known as the "Chicago Theatre of the Air" was a very distinguished presentation, superior to any such programming across the nation.

With our base in Chicago, we had a tremendous obligation to serve Midwestern farmers, not just with our regular program fare, but with that of a special professional nature for all types of farmers in Illinois, Wisconsin, Indiana, Michigan and Iowa, and other states having the benefit of our own clear channel coverage.

Since 1930, WGN Radio has carried general and specific information to farmers in the central states.

In 1941, and again in 1950, this service has been broadened.

In 1956, the Farm Department was extended in air time, day and night, presented to Midwestern agriculture by Farm Director Orion Samuelson and Associate Director Max Armstrong.

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In addition to their daily reports, they visit frequently farm activities such as regional and statewide conventions and special meetings.

Orion is recognized throughout American agriculture as the "dean" of farm broadcast personalities. He comes by it naturally; he grew to manhood on a multi-product farm in the Kickapoo Valley of Wisconsin.

Messrs. Samuelson and Armstrong, with the writer, have appeared at countless agriculture meetings and have often delivered speeches or conducted discussion panels.

We have done this to see in what way we can be of better professional service to farmers.

We think it important to mention another WGN service to its large and broad coverage audience. Beginning in 1956, we introduced traffic copter service offering traffic information to our automobile audience. This was a first for Chicago!

Mr. Chairman, as I review the programming efforts of WGN since 1924, and an overall leadership in both radio and television, it is my hope that this truly great pioneer radio property can continue with the current cross-ownership status.

To this broadcast veteran, it would seem that doing so would be in the public interest!

While writing these thoughts I should like to address an area that is often misunderstood.

I have written of my more than sixty years with Tribune Company. During that time frame I've never been asked by the Colonel or any other person to address the political area in any way.

As Director of Community Affairs, I started a program series in 1947 to demonstrate the integrity of Tribune Company and its broadcast programming.

I developed a series called "Your Right to Say It," taken from Voltaire: "I disapprove of what you say, but I will defend to the death *your right to say it.*" (italics mine)

I produced this series with Dr. William S. Stokes, head of the Political Science Department of Northwestern University, as moderator.

We aired the show at 6:00 p.m. Sundays.

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One evening after completing the debate, I announced that "next Sunday at the same time, we will bring you a debate between the Chairman of the U.S. Chamber of Commerce and Mr. Norman Thomas, the constant presidential candidate of the Socialist Party. The subject will be 'The Free Enterprise System or Socialism?'"

When I reached the main traffic office of WGN, I was told "Goodbye, Ward! Now you have had it. If the Colonel heard that, you are through!"

The phone rang and my associates said, "Ward, that's the Colonel; you've had it!"

It was the Colonel. He praised my work developing and producing this highly successful series and then asked me a "favor."

He said, "Ward, kindly call Mr. Thomas on Monday and ask him if he and Mrs. Thomas would join Mrs. McCormick and me for dinner at our home after next Sunday's show."

Well, Mr. Thomas came alone to Chicago, as his wife was ill. Mr. Thomas did accept the invitation and had a fine evening with the Colonel and Mrs. McCormick.

The next day, Monday, the Colonel escorted Mr. Thomas to the total Tribune production center where the Socialist leader met union and non-union personnel.

It was a pleasant experience for the Colonel and his guest, and Ward Quaal was a very happy young man!

Mr. Chairman, there has never been Tribune corporate interference with broadcasting.

The Colonel has been laid to rest, but his successors pursue fully that same policy!

Mr. Chairman, I have taken much of your time, but I felt impelled to tell you about the Company that has given me such wonderful and happy support over six decades.

Warmest personal regards!

Very respectfully,



Ward L. Quaal

WLQ:jck

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