

Brandon Burgess
Chairman and Chief Executive Officer



January 30, 2008

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

Re: Satellite Carriage of Digital Television Signals
CS Docket Nos. 98-120 and 00-96

Dear Chairman Martin:

As we enter 2008, the digital transition is upon us and it has never been more important to television stations that their digital signals are passed through to consumers in all cable and satellite households. ION Media Networks ("ION Media") applauds your efforts to ensure that all consumers enjoy the benefits of free over-the-air digital television. In particular, the Commission's order regarding the viewability of DTV signals on cable systems represented another important step in ensuring the continued viability of independent, religious, and small broadcasters.

With February 17, 2009 fast approaching, the Commission now must turn its attention to satellite and adopt rules on the carriage of television broadcasters digital signals to ensure that no consumers are left behind. We urge the Commission to act now by extending to DBS systems the following carriage requirements:

Carry local DTV must-carry stations; and

Carry one, carry all HD broadcast signals of DTV must-carry stations.

As you know, the Commission in January 2001 adopted rules applying these kinds of requirements to cable systems. To date, neither of these requirements has yet been applied to DBS. In fact, the Commission has not adopted *any* requirements for carriage of broadcasters' digital signals on DBS systems.

The disparity between cable and DBS carriage requirements must be removed. The Satellite Home Viewer Act directed the Commission to promulgate carriage requirements for DBS systems that are comparable to the carriage requirements applicable to cable systems. The Commission has assembled a full record on these issues and the time is now right to act and apply to DBS systems the two most basic DTV signal carriage requirements already that apply to cable systems.

ION Media has followed the Commission's DTV directives and invested greatly in the DTV transition to the tune of over \$100 million. ION Media has launched two 24/7 digital networks and will continue to invest in high quality digital programming as one of the few

remaining truly independent broadcasting voices. In the end, however, our ability to be successful will turn on whether the large video distributors, such as DirectTV and DISH Network, provide our free programming to their subscribers.

ION Media looks forward to working with the Commission in successfully adopting satellite carriage rules in a manner that will help to preserve the viability of free, over-the-air, DTV broadcasting.

Very truly yours,

A handwritten signature in black ink that reads "Burgess." The signature is written in a cursive, flowing style.

Brandon Burgess
Chairman and Chief Executive Officer
ION Media Networks

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