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November 20, 2008

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VIA ELECTRONIC FILING

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

Re: Broadcast Localism, MB Docket No. 04-233

Dear Ms. Dortch:

On November 19, 2008, Dunia A. Shive, President and Chief Executive Officer of Belo Corp., Guy H. Kerr, Belo's Executive Vice President, Law and Government, and Richard E. Wiley of Wiley Rein LLP met separately with (1) Commissioner Michael J. Copps and Rick C. Chessen, his Senior Legal Advisor and Media Advisor; (2) Commissioner Jonathan S. Adelstein and Rudy Brioché, his Legal Advisor for Media Issues; and (3) Commissioner Robert M. McDowell and Rosemary C. Harold, his Media Legal Advisor.

The meeting participants discussed the progress that Belo television stations have made in the conversion to digital television, and the potential adoption of a "quiet period" in retransmission consent negotiations leading up to the transition. Consistent with Belo's comments in the localism docket, the Belo representatives also discussed the high caliber of local programming and service that television broadcasters provide to their local communities and urged the Commission to avoid unnecessary regulation in this area.

Please direct any inquiries concerning this matter to the undersigned.

Respectfully submitted,

/s/
Martha E. Heller

cc: Michael Copps, Rick Chessen, Jonathan Adelstein, Rudy Brioché, Robert McDowell, Rosemary Harold