Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Petition for Rulemaking to Amend the	)	MB Docket No. 10-71
Commission's Rules Governing	)	
Retransmission Consent	)	

COMMENTS OF LOCAL BROADCASTERS COALITION

Allbritton Communications Company

Bahakel Communications, Ltd.

Communications Corporation of America

Cordillera Communications, Inc.

Granite Broadcasting Corporation

Local TV, LLC

Malara Broadcast Group, Inc.

McGraw-Hill Broadcasting Company

Media General, Inc.

Meredith Corporation

Midwest Television, Inc.

Smith Media, LLC

White Knight Holdings, Inc.

WNAC, LLC

May 18, 2010

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SUMMARY

The Local Broadcasters Coalition hereby offers these Comments in response to the Media Bureau's *Public Notice* of March 19, 2010, concerning the Petition for Rulemaking (the "MVPD Petition") filed by fourteen entities including representatives from the cable and satellite industry (the "Petitioners") that seeks Commission action to modify retransmission consent statutory and regulatory provisions.[1]

The Local Broadcasters Coalition is comprised of numerous television broadcast groups that collectively own over one-hundred full-power television stations operating in a cross-section of dozens of diverse television markets throughout the country, as identified in Attachment A. Collectively, the members of the Local Broadcasters Coalition negotiate thousands of retransmission agreements every three-year carriage cycle with cable, telephony, over-builder, direct-to-home and other multi-channel video programming distributors ("MVPDs"), substantially all without any consumers losing MVPD access to their signals. The Local Broadcasters Coalition members are therefore eminently qualified to address the main issues raised by the Petitioners. Their experience confirms that the Commission must reject the MVPD Petition.

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[1] *Media Bureau Seeks Comment on a Petition for Rulemaking to Amend the Commission's Rules Governing Retransmission Consent, Public Notice*, MB Docket No. 10-71, DA-10-474 (rel. Mar. 19, 2010). The Media Bureau extended the comment deadline to May 18, 2010 by an *Order* released April 2, 2010. *Petition for Rulemaking to Amend the Commission's Rules Governing Retransmission Consent*, MB Docket No. 10-71, DA 10-594 (rel. Apr. 2, 2010).

INTRODUCTION

Typically, owners of intellectual property rely on congressionally created mechanisms to control the distribution of their property, including how owners of those protected works get paid. For the most part, because congressionally created exceptions to intellectual property laws grant statutory licenses to MVPDs, local broadcasters are unable to enforce copyright or trademark rights against MVPDs serving their local markets.[2] Instead, Congress granted local broadcasters a similar right to control the retransmission of their signals by MVPDs.[3] Yet, whether the mechanism is called "copyright" or "retransmission consent," it is nothing more than two sides of the same coin by which content owners exercise lawful and necessary control over the distribution of their property -- video and audio programming -- by MVPDs.

Broadcasters, of course, are not alone in protecting the distribution of their content. Cable networks can and do withhold copyrights until they find common ground with distributors about the level of compensation and the extent and manner of distribution for their programming. Consequently, it is neither unreasonable nor invidious for content creators to seek fair compensation and distribution terms from the MVPDs who resell the creative works to the public.

By any measure, carriage of broadcast signals delivers tremendous value to MVPDs because the programming on broadcast television remains the most popular video programming available on any platform. During the most recent television season, an overwhelming 99 of the top 100 and 197 of the top 200 programs appeared on broadcast television – *not* cable networks.[4] Broadcast stations air syndicated programming that is informative and entertaining – and that typically airs first on broadcast stations before airing in second and third runs on cable networks at later times. Broadcast television also is the most important source for local news. In addition, when local emergencies

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[2] *See, e.g.*, 17 U.S.C. Sections 111, 119, 122.

[3] 47 C.F.R Section 325(b).

occur, broadcasters are the first place that viewers turn.[5] Providing high quality programming, however, is expensive, and, like any commercial enterprise, broadcasters must be able to share in the value that they create in order to continue investing in the programming and news that Americans want.

I. The Retransmission Consent System Is Only Now Providing a Necessary Second Revenue Stream To Support Local Stations, Local Programming, and Local Jobs.

Congress created the broadcast retransmission consent process as part of the Cable Television Consumer Protection and Competition Act of 1992 because it wanted to provide broadcasters with a means to control – and thus be compensated for – the distribution of their programming by those who charge broadcaster's customers.[6] The Senate Commerce Committee described the situation as follows:

> Broadcast signals, particularly local broadcast signals, remain the most popular programming carried on cable systems, representing roughly two-thirds of the viewing time on the average cable system. It follows logically, therefore, that a very substantial portion of the fees which consumers pay to cable systems is attributable to the value they receive from watching broadcast signals. Due to the FCC's interpretation of Section 325, however, cable systems use these signals without having to seek the permission of the originating broadcaster or having to compensate the broadcaster for the value its product creates for the cable operator.[7]

Congress rightly concluded that this lack of compensation ultimately could threaten the existence of free, over-the-air television.[8] By granting broadcasters retransmission consent rights, Congress expected broadcasters to correct the imbalance between the tremendous value provided to MVPDs

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4 Television Bureau of Advertising, *Top Rated Programs of 2008-09 in Households, at* http://www.tvb.org/rcentral/ViewerTrack/FullSeason/08-09-season-hh.asp.

5 The Pew Research Center for the People & The Press, PUBLIC EVALUATIONS OF THE NEWS MEDIA: 1985-2009, PRESS ACCURACY RATING HITS TWO DECADE LOW, p. 4 (Sept. 12, 2009) (finding that Americans believe that local TV does more to uncover important local news stories than any other source).

6 S. REP. NO. 102-92, at 34 (1991) ("Senate Report").

7 Senate Report at 35.

8 Senate Report at 35.

and the minimal consideration received in return.[9] Despite the efforts of Congress, broadcasters overall received little in the way of compensation for their retransmission consent until very recently.

Even today, broadcast retransmission fees pale in comparison to the fees that MVPDs pay the non-broadcast networks, virtually all of which have lower ratings than the local television stations receiving retrans fees. Indeed, the Petitioners' own data source confirms that the three to four local television stations in a market who actually receive retransmission fees from MVPDs were paid an average monthly fee of just $0.185 in 2009 for each subscriber who received their highly valuable and desirable programming.[10] Conversely, numerous national cable networks – which have no local programming, local presence, or local employees – collect fees that are several times this figure.[11] For example, in 2007 (the most recent information available), networks such as Spike, E!, Golf, MTV, Disney, TNT, and Fox Sports were paid license fees from MVPDs that exceeded, often substantially, the fees that local broadcasters received in 2009.[12]

Collectively, all MVPDs paid a total of $738 million in retransmission fees to local broadcasters in 2009.[13] In 2007, the most recent year in which such data is available, total operating expenses for all MVPDs exceeded $86 billion.[14] Thus, broadcast retransmission *at best* accounts for only 0.86 percent of total expenses.[15] By contrast, according to industry analyst SNL Kagan, MVPDs paid over $29 **billion** in programming fees to non-broadcast networks or approximately 33.5

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[9] Senate Report at 35.

[10] *See* SNL Kagan, "Broadcast retrans fees on track to break $1 bil. By 2011," *Broadcast Investor: Deals & Finance*, June 30, 2009 ("SNL Kagen Report").

[11] *See* Coalition for Retransmission Consent Reform, *Notice of Ex Parte*, MB Docket No. 06-180 (filed Feb. 15, 2007).

[12] *Id*.

[13] MVPD Petition at 26.

[14] U.S. Census Bureau, STATISTICAL ABSTRACT OF THE UNITED STATES: 2010 (129th Ed.), Table 1113, *Cable and Other Programming Distribution – Estimated Revenue and Expenses*.

[15] This is a conservative estimate. Data for total MVPD expenses in 2009 are not yet available, but they almost certainly are higher than $86 billion. Thus, retransmission consent fees in 2009 likely were an even smaller percentage than 0.86% of operating expenses.

percent of operating expenses.[16] According to SNL Kagan, in 2009 broadcast retransmission fees represented a mere 2.5 percent of all programming fees paid by MVPDs, as graphically illustrated below.

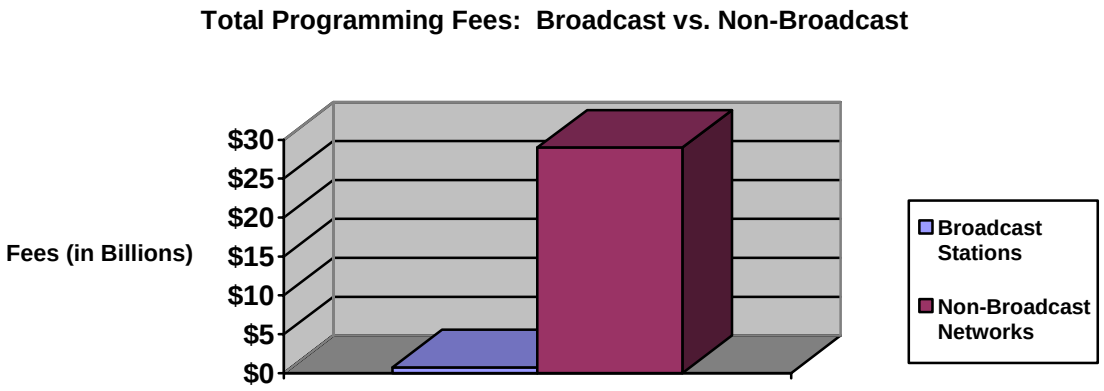

Figure 1: Comparison of total programming fees paid to all local broadcast stations ($738 million) and to all non-broadcast networks ($29 billion).

When television ratings are taken into account the difference is even more striking. Broadcast stations account for 45 percent of the total prime time television audience and 40 percent of the all-day audience.[17] In other words, less than 2.5 percent of an MVPD's programming budget is dedicated to programming watched by 40 percent of its customers.

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[16] Martin Peers, *For TV Industry, Sport Is the Most Dangerous Game*, WALL ST. J. (Mar. 8, 2010) (citing SNL Kagen Report).

[17] *Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming, Thirteenth Annual Report*, 24 FCC Rcd 542, ¶ 105 (2009).

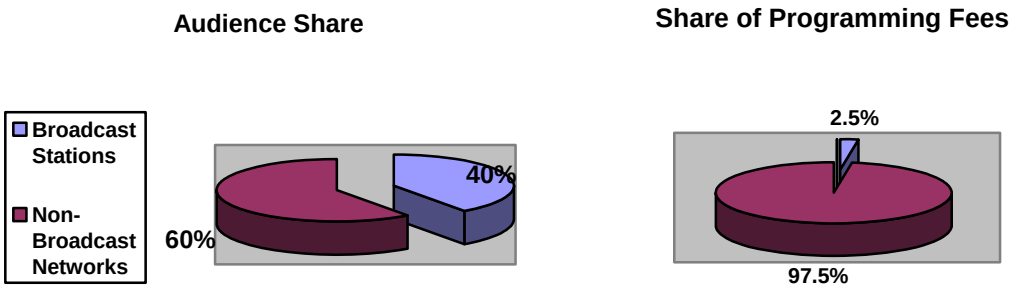

Figure 2: Comparison of audience and programming fees for local broadcast stations and non-broadcast networks.

By any analysis, broadcast retransmission fees are a bargain – especially when compared to the fees charged by various cable networks. Little-watched ESPN2, ESPN News, and ESPN Classic earned approximately $904 million in programming fees in 2009.[18] To put that in context, the MVPDs paid these little watched, national networks with NO local news or popular programming, *twenty-two percent more than MVPDs paid for all local broadcast stations combined.* And lead network ESPN, which has a national audience share of approximately 1.3 percent, receives 18.5 percent of all programming fees as consideration for licensing its programming to MVPDs.[19] Even TNT, which has a slightly higher audience share than ESPN, earns 4.3 percent of all programming fees.[20]

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[18] Martin Peers, *The ABC's of Cablevision's Dispute Over Television Fees*, WALL ST. J. (Mar. 8, 2010) (citing SNL Kagan Report).

[19] *Id.*

[20] *Id.*

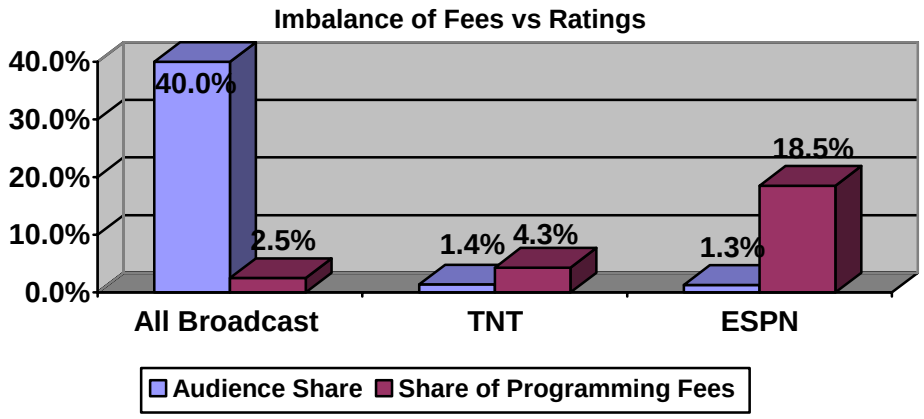

Figure 3: Imbalance of programming fees paid to certain non-broadcast networks when compared to audience ratings for broadcast stations.

In 1992, Congress foresaw a critical need for local broadcast stations to garner some portion of the tremendous value that they deliver every day to MVPDs. Now, with the Commission and the Federal Trade Commission separately exploring the future of media and local journalism, it is more critical than ever that local broadcasters receive a fair level of compensation reflecting the large audiences they deliver as a result of their decades-long, expensive investments in news, sports, and entertainment programming for their local audiences.

II. Retransmission Negotiations Have Not Led to a "Crisis" of Broadcast Signal Disputes.

The Petitioners' complaints of a retransmission consent "crisis" ring hollow. Carriage disputes that lead to service disruptions are exceedingly rare. In 2008, there were 7,853 cable systems and 1,378 commercial television stations.[21] Although not every broadcaster negotiates with every cable system in each three-year cycle, by any reasonable estimate, well over 10,000 retransmission consent negotiations occur every three years.[22] **Virtually all carriage negotiations**

[21] Number of Cable Headends – NCTA.com, *at* http://www.ncta.com/StatisticChart.aspx?ID=9; Licensed Broadcast Station Totals in the USA -- 1990 to Present, *at* http://www.fcc.gov/mb/audio/totals/bt081231.html.

[22] In Nielsen's 210 designated market areas, the Local Broadcasters Coalition estimates that approximately 800 commercial television stations elect retransmission consent with local cable and satellite operators. Based on the Local Broadcasters Coalition's experience, the typical television station must then negotiate with ten to fifteen distributors.

are resolved quietly without any public hint that a negotiation occurred.[23] Indeed, the cable industry has pointed to just thirteen instances since 2000 when a broadcaster and MVPD temporarily were unable to reach an agreement, and the majority of those thirteen involved the same cable and satellite operators.[24] The industry's own data therefore confirm just how well the retransmission consent system works: thirteen episodes out of tens of thousands of negotiations means that well over 99 percent of all retransmission negotiations did not involve a single viewer losing MVPD access to a local broadcast station. Far more viewers are inconvenienced by work stoppages such as the 2007 writers' strike than a retransmission consent dispute. Indeed, NAB has demonstrated that, "consumers are more than ***20 times*** more likely to be deprived of television viewing by an electricity outage than by a bargaining impasse between broadcasters and MVPDs."[25]

The MVPD Petition loudly trumpets several recent high profile carriage disputes as evidence of a "broken" system. Those examples, however, show that the system worked with minimal consumer disruption. Sinclair and Mediacom reached an agreement on January 7, 2010, and Fox and Time Warner reached an agreement on January 1, 2010. In both cases, the parties reached a settlement once it became apparent that the Commission would not intervene.[26] Importantly, **in both of the examples cited by the Petitioners, subscribers never lost service**. Although the ABC/Cablevision negotiation did lead to a brief disruption, the outage lasted only a few hours.

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[23] *See, e.g.*, National Association of Broadcasters, *Notice of Ex Parte Communication*, in MB Docket No. 10-71, at 3 (filed May 6, 2010) ("NAB Ex Parte"); ATV Broadcast, LLC, *Comments*, in MB Docket No. 10-71, at 2 (filed Apr. 28, 2010) (explaining that ATV Broadcast, LLC has participated in over 7,000 carriage negotiations since 1993 and only four resulted in a temporary service disruption).

[24] *See* Katz Study at 44. The cable industry report cited thirteen examples. It did not include the brief disruption caused by the ABC/Cablevision dispute in March 2010, but one of the cited examples in the report should not have been included. The dispute involving Sinclair Broadcast Group and Suddenlink Communications was resolved without a service disruption according to trade press reports. *See* Mike Farrel, *Suddenlink, Sinclair Settle Retrans Flap*, MULTICHANNEL NEWS (Aug. 10, 2006).

[25] *See* NAB Ex Parte at 3.

[26] *See* Federal Communications Commission Chairman Julius Genachowski Statement on Retransmission Disputes (rel Dec. 31, 2009) ("Assuming that the parties negotiate in good faith during the extension, therefore, I will not seek a further continuation of carriage absent a new agreement between the parties.").

The dearth of service disruptions involving local broadcasters stands in contrast to the more lengthy service disruptions that involve non-broadcast networks exercising their Congressionally created copyrights.

- In 2010, Cablevision customers lost access to the Food Network and Home and Garden Television for 21 days before the parties reached an agreement.[27]
- In 2009 and 2010, DirecTV customers endured an almost seven month outage of Versus.[28]
- To this day, certain Time Warner subscribers still cannot receive the Mid-Atlantic Sports Network even though the parties have been negotiating for more than two years.[29]
- Cablevision customers in New York did not have access to the YES Network and its broadcast of New York Yankees games until 2003, over a year after the network was launched.[30]
- In 2006, Dish Network customers lost access to Lifetime and the Lifetime Movie Network for one month before the parties reached an agreement.[31]

Curiously, these carriage disputes with national and regional cable networks, which typically involve higher license fees, more customers, and more lengthy service outages, have not garnered cries of outrage or "crisis" from the Petitioners. As such, the Commission must recognize the MVPD Petition for what it is: a transparent and concerted effort by the Petitioners to further strangle the ability of local broadcasters to share in the value created by their tremendous investments in local communities and expensive, popular programming.

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[27] Mike Farrell, *Scripps, Cablevision Reach a Compromise*, MULTICHANNEL NEWS (Jan 25, 2010), *available at* http://www.multichannel.com/article/445585-Scripps_Cablevision_Reach_A_Compromise.php

[28] Alex Weprin, *DirecTV, Versus Settle Carriage Dispute; Sports network will be available on satellite carrier after six and a half month dispute*, BROADCASTING & CABLE (Mar. 15, 2010), *available at* http://www.broadcastingcable.com/article/450282-DirecTV_Versus_Settle_Carriage_Dispute.php.

[29] *See* Letter from Rep. Howard Coble, *et al*, to Comm'r Julius Genachowski, *et al.* (Mar. 29, 2010), *available at* http://playballnow.org/attachments/315/original/NC_FCC_3_29_10.pdf.

[30] Richard Sandomir, *Baseball; Cablevision Agrees to Carry the YES Network*, THE NEW YORK TIMES (Mar. 13, 2003), *available at* http://www.nytimes.com/2003/03/13/sports/baseball-cablevision-agrees-to-carry-the-yes-network.html; Profile of Leo Hindrey, founding chairman of YES, *available at* http://www.cnbc.com/id/24775376/

[31] Steve Donahoe, *Dish Yanks Lifetime, LMN*, MULTICHANNEL NEWS (Jan. 2, 2006), *available at* http://www.multichannel.com/article/121577-Dish_Yanks_Lifetime_LMN.php; *DISH Network and Lifetime Entertainment Services Reach Multi-Year Agreement*, redOrbit.com (Feb. 1, 2006), *available at* http://www.redorbit.com/news/technology/376815/dish_network_and_lifetime_entertainment_services_reach_multi year_agreement/.

III. Congress Did Not Give the FCC Authority To Pick Winners and Losers.

The Commission does not have the authority to adopt the "interim carriage" proposals in the MVPD Petition. The Communications Act of 1934, as amended, is clear:

> No cable system or other multichannel video programming distributor shall retransmit the signal of a broadcasting station, or any part thereof, except with the express authority of the originating station.[32]

The statute therefore leaves no room for an interim carriage regime after the broadcaster's express authority has expired If a broadcaster does not grant its express authority to retransmit its signal, the Communications Act forbids the MVPD from carrying it.

Not only is the MVPD proposal forbidden by the express terms of the statute, it would put the Commission in the position of picking "winners and losers" in a private negotiation contrary to its long-standing policies of allowing the marketplace to determine success.[33] Withholding consent – or a copyright license – typically is the only leverage that a content owner can exert to force operators to negotiate in earnest. By providing for interim carriage under the terms of the prior agreement, the Commission would eviscerate a broadcaster's ability to negotiate any terms. Even if marketplace conditions demand a higher programming rate or different carriage terms, and even if the broadcaster acted with utmost good faith, an MVPD could simply avoid any negotiation by obtaining an automatic "extension." Such a result would conflict with the expressed intention of Congress in enacting the 1992 Cable Act:

> It is the Committee's intention to establish a marketplace for the disposition of the rights to retransmit broadcast signals; it is not the Committee's intention in this bill to dictate the outcome of the ensuing marketplace negotiations.[34]

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[32] 47 U.S.C. § 325(b)(1).

[33] *See, e.g.*, Deployment of Wireline Services Offering Advanced Telecommunications Capability, *Memorandum Opinion and Order, and Notice of Proposed Rulemaking*, 13 FCC Rcd 24011, 24014 (1998); Policies and Rules for the Direct Broadcast Satellite Service, *Report and Order*, 17 FCC Rcd 11331, 11376 (2002). *See also* Dissenting Statement of Commissioner Michael J. Copps, High Cost Universal Support, *Order*, 23 FCC Rcd 8834, 8946 (2008) (maintaining that Commission action amounted to "picking winners and losers").

[34] Senate Report at 36.

The Local Broadcasters Coalition's experience confirms that hard deadlines are the most effective means to reach an agreement. When extensions are freely given, progress is rarely made. Deadlines, however, focus the parties on the truly important issues. To avoid wasting time, each side is more likely to "give" on items that may not be as critical. Meaningful deadlines are the best way to ensure good faith negotiations. Moreover, when a hard deadline creates progress, the members of the Local Broadcasters Coalition regularly grant short extensions to allow talks to continue. When, however, an MVPD believes it can obtain an extension without having to make any concessions, MVPDs rarely offer concessions or otherwise make progress toward an agreement.

The Commission also must understand that broadcasters do not easily let a deadline lapse, because the station almost always will suffer more and more quickly than the MVPD. Local television stations typically employ only a few dozen news, sales, and engineering professionals. It is rare indeed for a station to have a public relations professional on staff, and rarer still to employ a manager who has undergone an MVPD's public relations campaign against his or her employer. In contrast, many MVPDs have ample experience preparing and waging public battles against programmers and managing consumer disruptions that occur when they cease carrying a broadcast station or cable network. Moreover, a television station suffers an *immediate* loss of ratings, revenue, and goodwill among clients and viewers when the MVPD drops its signal. But very few MVPD customers consider switching to another operator until a signal drop persists beyond a few weeks. **Given this tremendous imbalance, broadcasters cease granting retransmission consent to a particular MVPD *only as an absolute last resort* when all of their efforts to reach a reasonable agreement have failed and there appears no reasonable likelihood of an agreement with the MVPD.**

The Local Broadcasters Coalition's experience also demonstrates that Commission oversight of retransmission negotiations will prove unworkable. Contrary to the headlines in the trade press, retransmission consent disputes often involve complex issues other than money. More often than

not, compensation is among the very first issues on which the parties find common ground. Even after reaching an agreement on compensation, negotiations can involve months of further hard effort to resolve the remaining issues, such as confidentiality, analog versus digital tier carriage, multicast carriage, channel positioning, fiber backhauls, promotion and advertising schedules, carriage outside the DMA, after-acquired stations and systems, assignment rights, and most favored nations' provisions. The Commission cannot insert its judgment on these purely business terms. Congress wisely left these decisions to the marketplace participants to resolve.

To ensure that consumers are not caught off guard in the rare case of when negotiations reach an impasse, the Commission could more strictly enforce its *existing* consumer notifications requirements. Section 73.1603 of the Commission's rules requires cable operators to provide reasonable notice to its subscribers at least thirty days in advance of any changes to the programming service.[35] The notice requirements ensure that subscribers will have the opportunity to make alternative arrangements to be able to see their favorite programming before a service disruption occurs. Despite these clear requirements, certain cable operators routinely fail to comply with the notification requirements.[36] Through more prompt and aggressive enforcement of Section 76.1603, the Commission can address the needs of consumers without having to waste Commission resources on formal consideration of the proposals in the MVPD Petition.

CONCLUSION

The Petitioners' selective outrage towards broadcast programming fees rings hollow. Local broadcasters account for a mere 2.5 percent of programming fees paid by MVPDs, while broadcasters deliver 40 percent of all television audience viewing. Perhaps, this bargain price

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[35] 47 C.F.R. § 76.1603(b);

[36] *Time Warner Cable, Inc.*, 24 FCC Rcd 1064 (EB 2009) ($7,500 fine for failing to notify customers of change in programming service); *Oceanic Time Warner Cable, a subsidiary of Time Warner Cable, Inc., app. for rev. granted in part, denied in part*, FCC 09-52 (rel. Jun. 26, 2009) (upholding $7,500 fine for failing to notify Franchising Authority of service change); Time Warner Cable, *Order on Reconsideration*, 21 FCC Rcd 9016, 9025 at para. 26 (MB 2006), *consent decree adopted*, Order, 21 FCC Rcd 11229 (MB 2006).

explains why over 99 percent of all retransmission consent negotiations are resolved without any service disruption whatsoever.

Even if the Commission had the authority to implement the Petitioners' proposals – which it does not – the Commission should not interject itself into a process that only now, some 17 years after the 1992 Cable Act, begins to provide local broadcasters with some measure of tangible compensation for the heavy investments they make every day in, and for, their local communities.

Respectfully submitted,

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34 Main Street
Menham, MA 01984

May 18, 2010

ATTACHMENT A

LOCAL BROADCASTERS COALITION

Owner	DMA	Station
Allbritton Communications Company	Birmingham	WCFT-TV, Tuscaloosa, AL
	Birmingham	WJSU-TV, Anniston, AL
	Charleston	WCIV(TV), Charleston, SC
	Harrisburg-Lancaster	WHTM-TV, Harrisburg, PA
	Little Rock-Pine Bluff	KATV(TV), Little Rock, AR
	Roanoke-Lynchburg	WSET-TV, Lynchburg, VA
	Tulsa	KTUL(TV), Tulsa, OK
	Washington, DC	WJLA-TV, Washington, DC
Bahakel Communications, Ltd.	Charlotte	WCCB(TV), Charlotte, NC
	Columbia, SC	WOLO-TV, Columbia, SC
	Jackson, TN	WBBJ-TV, Jackson, TN
	Montgomery-Selma	WAKA(TV), Selma, AL
	Myrtle Beach-Florence	WFXB(TV), Myrtle Beach, SC
Communications Corporation of America	Alexandria, LA	WNTZ-TV, Natchez, MS
	Baton Rouge	WGMB-TV, Baton Rouge, LA
	El Paso	KTSM-TV, El Paso, TX
	Evansville	WEVV-TV, Evansville, IN
	Harlingen-Weslaco	KVEO-TV, Brownsville, TX
	Lafayette	KADN-TV, Lafayette, LA
	Odessa-Midland	KPEJ-TV, Odessa, TX
	Shreveport	KMSS-TV, Shreveport, LA
	Tyler-Longview	KETK-TV, Jacksonville, TX
	Waco-Temple	KWKT-TV, Waco, TX
	Waco-Temple	KYLE-TV, Bryan, TX
Cordillera Communications, Inc.	Billings	KTVQ(TV), Billings, MT
	Butte-Bozeman	KBZK-TV, Bozeman, MT
	Butte-Bozeman	KXLF-TV, Butte, MT
	Colorado Springs-Pueblo	KOAA-TV, Pueblo, CO
	Corpus Christi	KRIS-TV, Corpus Christi, TX
	Great Falls	KRTV(TV), Great Falls, MT
	Lafayette	KATC(TV), Lafayette, LA
	Lexington	WLEX-TV, Lexington, KY
	Missoula	KPAX-TV, Missoula, MT
	Santa Barbara-Santa Maria	KSBY(TV), San Luis Obispo, CA
	Tucson	KVOA(TV), Tucson, AZ
Granite Broadcasting Corporation	Binghamton	WBNG-TV, Binghamton, NY
	Buffalo	WKBW-TV, Buffalo, NY
	Detroit	WMYD(TV), Detroit, MI
	Duluth-Superior, MN/WI	KBJR-TV, Superior, WI
	Duluth-Superior, MN/WI	KRII(TV), Chisholm, MN
	Fresno-Visalia	KSEE(TV), Fresno, CA

Owner	DMA	Station
	Ft. Wayne	WISE-TV, Fort Wayne, IN
	Peoria-Bloomington	WEEK-TV, Peoria, IL
	San Francisco-Oakland	KOFY-TV, San Francisco, CA
	Syracuse	WTVH(TV), Syracuse, NY
Local TV, LLC	Cleveland-Akron	WJW(TV), Cleveland, OH
	Davenport-Rock Island, IA/IL	WQAD-TV, Moline, IL
	Denver	KDVR(TV), Denver, CO
	Denver	KFCT(TV), Ft Collins, CO
	Des Moines	WHO-DT, Des Moines, IA
	Ft. Smith-Fayetteville	KFSM-TV, Fort Smith, AR
	Greensboro-High Point	WGHP(TV), High Point, NC
	Huntsville-Decatur	WHNT-TV, Huntsville, AL
	Kansas City	WDAF-TV, Kansas City, MO
	Memphis	WREG-TV, Memphis, TN
	Milwaukee	WITI(TV), Milwaukee, WI
	Norfolk-Portsmouth	WTKR-TV, Norfolk, VA
	Oklahoma City	KAUT-TV, Oklahoma City, OK
	Oklahoma City	KFOR-TV, Oklahoma City, OK
	Richmond-Petersburg	WTVR-TV, Richmond, VA
	Salt Lake City	KSTU(TV), Salt Lake City, UT
	St. Louis	KTVI(TV), St. Louis, MO
	Wilkes Barre-Scranton	WNEP-TV, Scranton, PA
Malara Broadcast Group, Inc.	Duluth-Superior, MN/WI	KDLH(TV), Duluth, MN
	Ft. Wayne	WPTA(TV), Fort Wayne, IN
McGraw-Hill Broadcasting Company	Bakersfield	KERO-TV, Bakersfield, CA
	Denver	KMGH-TV, Denver, CO
	Indianapolis	WRTV(TV), Indianapolis, IN
	San Diego	KGTV(TV), San Diego, CA
Media General, Inc.	Augusta	WJBF(TV), Augusta, GA
	Birmingham	WVTM-TV, Birmingham, AL
	Charleston	WCBD-TV, Charleston, SC
	Columbus, GA	WRBL(TV), Columbus, GA
	Columbus, OH	WCMH-TV, Columbus, OH
	Greenville	WNCT-TV, Greenville, NC
	Greenville-Spartanburg, NC/SC	WSPA-TV, Spartanburg, SC
	Greenville-Spartanburg, NC/SC	WYCW(TV), Asheville, NC
	Hattiesburg-Laurel	WHLT(TV), Hattiesburg, MS
	Jackson, MS	WJTV(TV), Jackson, MS
	Mobile, AL-Pensacola, FL	WKRG-TV, Mobile, AL
	Myrtle Beach-Florence	WBTW(TV), Florence, SC
	Providence-New Bedford, RI/MA	WJAR(TV), Providence, RI
	Raleigh-Durham	WNCN(TV), Goldsboro, NC
	Roanoke-Lynchburg	WSLS-TV, Roanoke, VA
	Savannah	WSAV-TV, Savannah, GA
	Tampa-St. Petersburg	WFLA-TV, Tampa, FL
	Tri-Cities, TN-VA	WJHL-TV, Johnson City, TN
Meredith Corporation	Atlanta	WGCL-TV, Atlanta, GA

Owner	DMA	Station
	Flint-Saginaw	WNEM-TV, Bay City, MI
	Greenville-Spartanburg, NC/SC	WHNS(TV), Greenville, SC
	Hartford & New Haven	WFSB(TV), Hartford, CT
	Kansas City	KCTV(TV), Kansas City, MO
	Kansas City	KSMO-TV, Kansas City, MO
	Las Vegas	KVVU-TV, Henderson, NV
	Nashville	WSMV-TV, Nashville, TN
	Phoenix	KPHO-TV, Phoenix, AZ
	Portland	KPDX(TV), Vancouver, WA
	Portland	KPTV(TV), Portland, OR
Midwest Television, Inc.	San Diego, CA	KFMB-TV, San Diego, CA
Smith Media, LLC	Burlington-Plattsburgh, VT/NY	WFFF-TV, Burlington, VT
	Santa Barbara-Santa Maria	KEYT-TV, Santa Barbara, CA
	Utica	WKTV(TV), Utica, NY
White Knight Holdings, Inc.	Baton Rouge	WVLA-TV, Baton Rouge, LA
	Shreveport	KSHV-TV, Shreveport, LA
	Tyler-Longview	KFXK-TV, Longview, TX
WNAC, LLC	Providence-New Bedford, RI/MA	WNAC-TV, Providence, RI