

July 16, 2010

VIA ECFS FILING

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

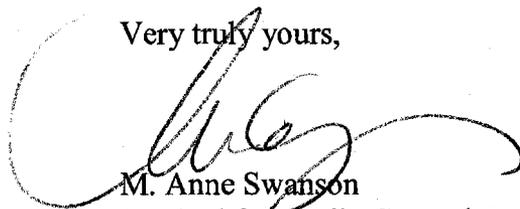
Re: MB Docket No. 09-182

Dear Ms. Dortch:

On July 12, 2010, Media General, Inc. ("Media General") filed comments in the above-referenced docket in response to the *Notice of Inquiry* that was released on May 25, 2010 ("NOI"). In footnote 4 of the comments, Media General incorporated by reference its prior comments filed on May 7, 2010 in the "Future of Media" proceeding (GN Docket No. 10-25). For the Commission's convenience and as directed by footnote 120 of the NOI, I am submitting herewith a copy of those prior "Future of Media" comments.

If you have any questions regarding this submission, please contact me.

Very truly yours,



M. Anne Swanson
Counsel for Media General, Inc.

Enclosure

Media General is the nation's preeminent practitioner of newspaper/broadcast cross-ownership in medium- and small-sized markets. As a result, its interests are critically affected by proceedings such as this. In the Commission's review of media ownership regulation to date, despite submission of voluminous materials (comments, reply comments, outside studies, FCC studies, peer review reports) demonstrating that cross-ownership increases the quality and quantity of local news delivered to communities, Media General has seen only very limited loosening of cross-ownership regulation, "reform" that has retained the FCC's 35-year old ban on cross-ownership and added waiver relief that is presumptive in only the nation's Top 20 Nielsen Designated Market Areas ("DMAs").

As an effort to collect data and assess the media landscape, this proceeding can assist in that media ownership debate. But an assessment is what this exercise should remain. The evaluation of regulatory proposals and changes to codified rules should be conducted on the record in notice and comment rulemaking proceedings subject to the Administrative Procedure Act. An assessment, not recommendations, should be the goal of this inquiry.

As an assessment, this exercise must recognize the profound change -- both secular and cyclical -- affecting American media today. Rules proposed today and adopted tomorrow are outdated and not reflective of market conditions by the time they become effective. The media industry definitely is in a transition phase, meaning that this is not a time for government prescriptions. The market is providing, and will continue to provide, appropriate answers.

This proceeding's initial public notice recognized the need to "First do no harm."² Any attempt to use this proceeding for more than an assessment would violate that admonition. To proceed further and make recommendations advocating an increase in government's

² FCC Public Notice, DA 10-100, at 2.

entanglement in media, in general, and in the cross-ownership of newspapers and broadcast stations, in particular, would be a misuse of the proceeding and a serious legal, political, and practical mistake on the Commission's part. As a result of the decades-old newspaper/broadcast cross-ownership rule, government is already too involved in the regulation of newspapers. Less, not more, regulation will create the best future for journalism in this country.

Second, hard as it is to believe, the Commission's media ownership proceedings to date have failed sufficiently to acknowledge the prevalence and use of independent Internet sites providing local news and information, sites unaffiliated with existing media outlets in a market. Media General is commenting today for the narrow purpose of urging the Commission to use its report on the "Future of Media" to correct this error.

Media General has submitted evidence on the existence of such sites numerous times in the media ownership proceedings, most recently on November 20, 2009.³ In these most recent comments, Media General randomly selected markets in each quartile of the first 100 DMAs and demonstrated the availability in each market of between three and eight local news and information sites, unaffiliated with existing media, totals that were not exhaustive and would have increased with more research. Media General then showed that each of these sites had thousands, and sometimes millions, of unique and total visitors over the preceding calendar year.

To further supplement the Commission's knowledge on this point, Media General attaches more data, this time from one of the medium-sized markets in which it owns both a newspaper and a television station -- Tri-Cities, TN/VA, the nation's 93rd ranked DMA. This is a market which has abundant and high quality local news. Indeed, Media General's newspaper in the market, the *Bristol Herald Courier*, last month won the Pulitzer Prize for public service for

³ Comments, submitted by Media General, Inc. in MB Docket No. 09-182, Nov. 20, 2009.

its multi-part series reporting on governmental mismanagement of natural gas royalties owed to thousands of Virginia landowners.⁴ The greater resources available in the market because of the presence of Media General's multiple news outlets, including a television station, helped provide the newspaper's staff (which numbers only seven reporters) with the ability to develop its multi-part award-winning series, while still covering other developments in the DMA, which geographically is about the size of Connecticut.

The attached data demonstrate the presence of a substantial number of Internet sites dedicated to providing local news and information to residents of the Tri-Cities DMA. In Attachment A, these sites are listed and organized according to the categories suggested in a recent and still ongoing study by Michele McLellan, Reynolds Journalism Institute Fellow and a consultant to the Knight Foundation.⁵ Using her criteria, the data show (i) an independent state investigative journalism site and a local site on sports written by professional journalists who previously worked with more traditional outlets -- "New Traditional" sites; (ii) "Community" sites, which, as Ms. McLellan describes, "often rely on professional journalists but . . . tend to be bootstrappers who focus on community building"; (iii) "Microlocal" sites, which provide highly granular news of a defined neighborhood or town; (iv) "Niche" sites, which "focus tightly" on specific topics, such as entertainment, health, or the environment; (v) "Mini Sites," which are "typically run by one or two people [and] . . . tend to be idiosyncratic in [their] selection of stories"; (vi) "Local News System" sites, which "are highly local, low cost sites created with a

⁴ Daniel Gilbert, "Underfoot, Out of Reach: A series on the conflicts over Southwest Virginia's natural gas wealth," available at http://www2.tricity.com/tri/special_sections/mineral_rights/ (last visited May 7, 2010).

⁵ Michele McLellan, "Michele's List: Promising local news sites," available at <http://www.rjionline.org/projects/mcellan/stories/community-news-sites/index.php> (last visited May 7, 2010).

regional or national template, often by a corporation”; and (vii) “Aggregator” sites, which lead local residents to more news about their communities produced by other outlets.⁶

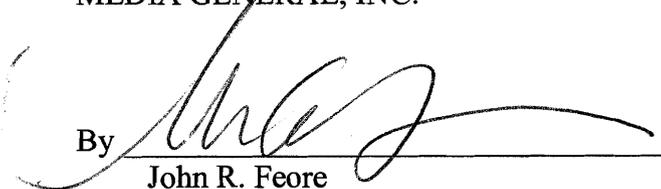
In terms of size and rank, Tri-Cities is in the “middle” of the five DMAs where Media General owns and operates a cross-owned newspaper and television station, and it is representative of medium-sized markets. The availability in this market of so many local news and information Internet sites, not affiliated with existing media, is typical of what the FCC will find in markets throughout the nation.

It is time for the Commission, once and for all, to recognize Internet sites as providing abundant and vibrant competition to more traditional media outlets. Media General submits that this is the proceeding in which the FCC should put the issue to rest once and for all. It is also time for the government to step aside in its regulation of media and let innovative forces innovate in their production of news and information, and this proceeding should acknowledge that point.

Respectfully submitted,

MEDIA GENERAL, INC.

By



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⁶ *Id.*

<p>New Traditionals Independent work of professional journalists</p> <p>http://tennessee.watchdog.org/ http://www.tricitysports.com</p>
<p>Community Bootstrappers who focus on community building</p> <p>http://believeinbristol.org/ http://www.tennesseepolicy.org/ http://www.mybristolonline.com http://www.returntoroots.org/ http://www.easttennessean.com/</p>
<p>Microlocal Highly granular news of defined neighborhood or town</p> <p>http://news.king.edu/ http://www.milligan.edu/news/index.html http://www.vic.edu/frameset.html?/news/campus_news/index.shtml&1 http://www.vtnews.vt.edu/ http://jeffleeming.blogspot.com/ http://www.kingsportchamber.org/news.php</p>
<p>Niche Focus on specific topics (restaurants, entertainment, health, politics, etc.)</p> <p>http://pflagtricity.blogspot.com/ http://taxingtennessee.blogspot.com/ http://www.tennviews.com/ http://www.theshowlive.info/</p>
<p>Mini Sites Small, idiosyncratic sites with little focus on advertising</p> <p>http://guerillawomentn.blogspot.com/ http://monkeymucker.blogspot.com/</p>
<p>Local News Systems Highly local sites created from a regional or national template by a corporation</p> <p>http://www.topix.net/city/johnson-city-tn http://www.topix.net/city/kingsport-tn</p>
<p>Aggregators Curators of links and headlines from other sources</p> <p>http://www.newsbystate.com/tennessee.htm http://www.yahoo.com http://www.kingsport.tv http://www.pr.com/news-by-msa/322</p>