

COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

BEIJING
BRUSSELS
LONDON
NEW YORK
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
WASHINGTON

June 23, 2011

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Petition to Amend Retransmission Consent Rules*, MB Docket 10-71
Innovation in the Broadcast Television Bands, ET Docket No. 10-235
2010 Quadrennial Regulatory Review, MB Docket No. 09-182

Dear Ms. Dortch:

On June 22, 2011, Craig Dubow, Chairman and Chief Executive Officer, Gannett Co., Inc. (“Gannett”), Gracia Martore, President and Chief Operating Officer of Gannett, Dave Lougee, President, Broadcasting Division, Gannett, and Todd Mayman, Senior Vice President, General Counsel and Secretary of Gannett, met with Chairman Julius Genachowski and Amy Levine, Special Counsel and Legal Advisor to the Chairman. The participants discussed the possible reallocation of broadcast spectrum for wireless broadband and the Commission’s proposed changes to the retransmission consent system.

The Gannett representatives indicated an interest in working with policymakers to fashion a comprehensive plan for promoting the best possible broadcast and broadband systems for all Americans. In Gannett’s view, incentive auctions that are truly voluntary may be appropriate. Any such auctions, however, must be designed from the outset to provide protections to ensure that the broadcasting system continues to serve the needs of the viewing public and does not prevent broadcasters from being able to serve the public as they do today. Gannett believes that any new legislation should contain strong protections against forced repacking, and, at a minimum, the Commission must protect against these harms, which would impair broadcasters’ ability to finance local programming and newsgathering and to provide innovative new services to the public. In addition, the Gannett representatives expressed concern about any burdensome new spectrum fees, which would likewise impair broadcasters’ ability to deliver important public services. Gannett also expressed its support for the Commission’s efforts to inventory the spectrum in use by various sources.

The participants also discussed the retransmission consent system, which provides essential benefits to the public in expanding access to highly valued broadcast signals and helping to finance programming about local communities. The Gannett representatives explained that the marketplace is finally beginning to function as Congress

intended when it carefully crafted the retransmission consent system in 1992. While retransmission consent fees remain modest compared to the fees recovered by cable networks, the dual revenue stream that stations recover from advertising revenues and retransmission consent fees is essential to the broadcasting industry's ability to continue to serve its communities of license and to invest in local news, weather, and public affairs programming. Moreover, the retransmission consent system is a well-functioning marketplace. Gannett has successfully completed literally hundreds of retransmission consent negotiations over the past 18 years, including significant negotiations in the current market. There is no evidence of a need for change, but every reason to retain consistency and reason in this longstanding and valuable process.

Finally, the Gannett representatives noted the potential for true market-based ownership regulation to foster innovative and increased local journalism and expressed Gannett's support for modifications to the cross-ownership rules that would further those objectives.

Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Kurt Wimmer

Kurt Wimmer

Counsel to Gannett Co., Inc.

cc: Hon. Julius Genachowski
Amy Levine, Esq.