



Paul Boyle
Senior Vice President
Public Policy

November 10, 2011

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: Notice of *Ex Parte* Communications
MB Docket Nos. 09-182, 06-121**

Dear Ms. Dortch:

On November 8, 2011, and on behalf of the Newspaper Association of America (“NAA”), I met separately with (1) Sherrese Smith, Senior Counsel & Legal Advisor for Media, Consumer and Enforcement Issues to Chairman Julius Genachowski; and (2) Erin McGrath, Acting Legal Advisor for Media Issues to Commissioner Robert McDowell. During the meetings, I discussed the state of the newspaper industry and the transformation that newspaper publishing is undergoing as a result of the ongoing changes in the media marketplace. In addition, I discussed the need for relief from the newspaper/broadcast cross-ownership rule and the adverse impact that continued regulation will have on newspaper publishing. I also provided the attached handouts, which document ongoing and forecasted declines in newspaper advertising revenues, both in general and as compared to newspapers’ multi-media competitors.

Respectfully submitted,

Paul Boyle

cc (via email): Sherrese Smith
Erin McGrath

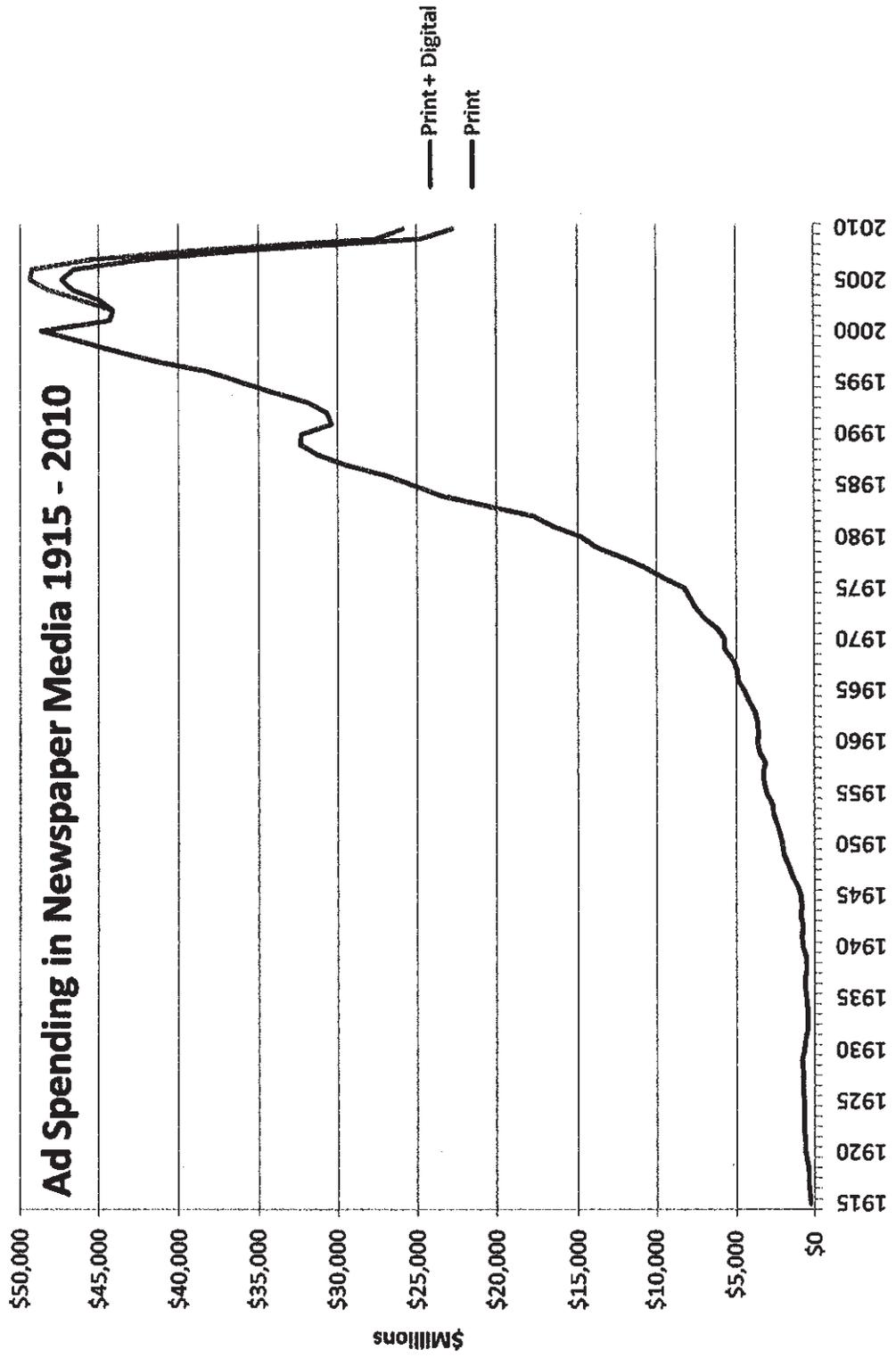
The 2011 Numbers

Summary: Newspaper Advertising Expenditures (\$Millions)

	Retail	National	Classified	Print Total	Online	Grand Total
2010 Q2	\$3,217.610	\$1,079.994	\$1,396.868	\$5,694.472	\$743.885	\$6,438.357
2011 Q2	\$2,958.273	\$985.078	\$1,245.267	\$5,188.617	\$803.396	\$5,992.013
	-8.1%	-8.8%	-10.9%	-8.9%	8.0%	-6.9%
2010 Q1	\$2,955.833	\$1,038.670	\$1,252.746	\$5,247.248	\$730.424	\$5,977.672
2011 Q1	\$2,674.912	\$924.416	\$1,150.658	\$4,749.986	\$807.849	\$5,557.835
	-9.5%	-11.0%	-8.1%	-9.5%	10.6%	-7.0%
2010 H1	\$6,173.442	\$2,118.664	\$2,649.613	\$10,941.720	\$1,474.309	\$12,416.029
2011 H1	\$5,633.184	\$1,909.494	\$2,395.925	\$9,938.603	\$1,611.245	\$11,549.848
	-8.8%	-9.9%	-9.6%	-9.2%	9.3%	-7.0%

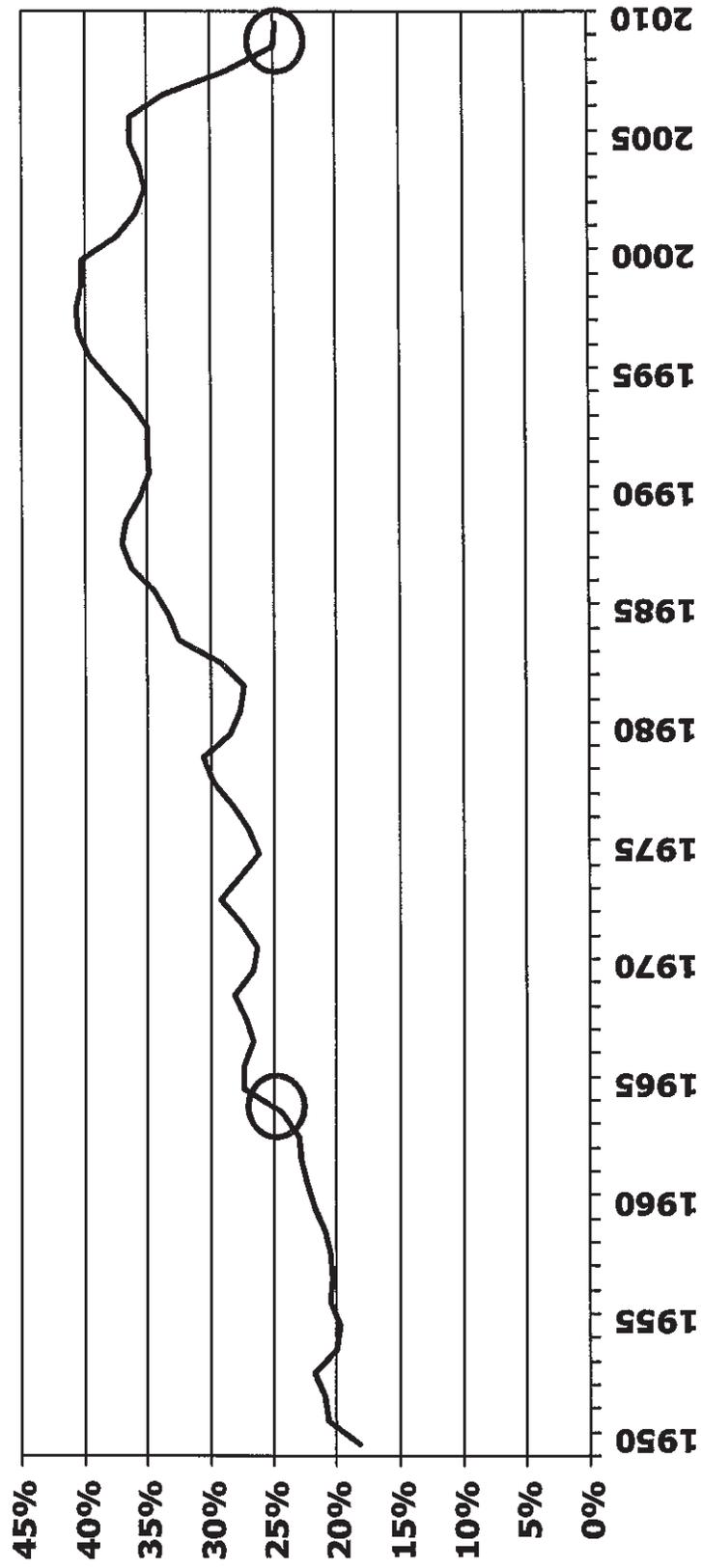
Source: NAA

Ad Dollars: Revisiting the 1980's

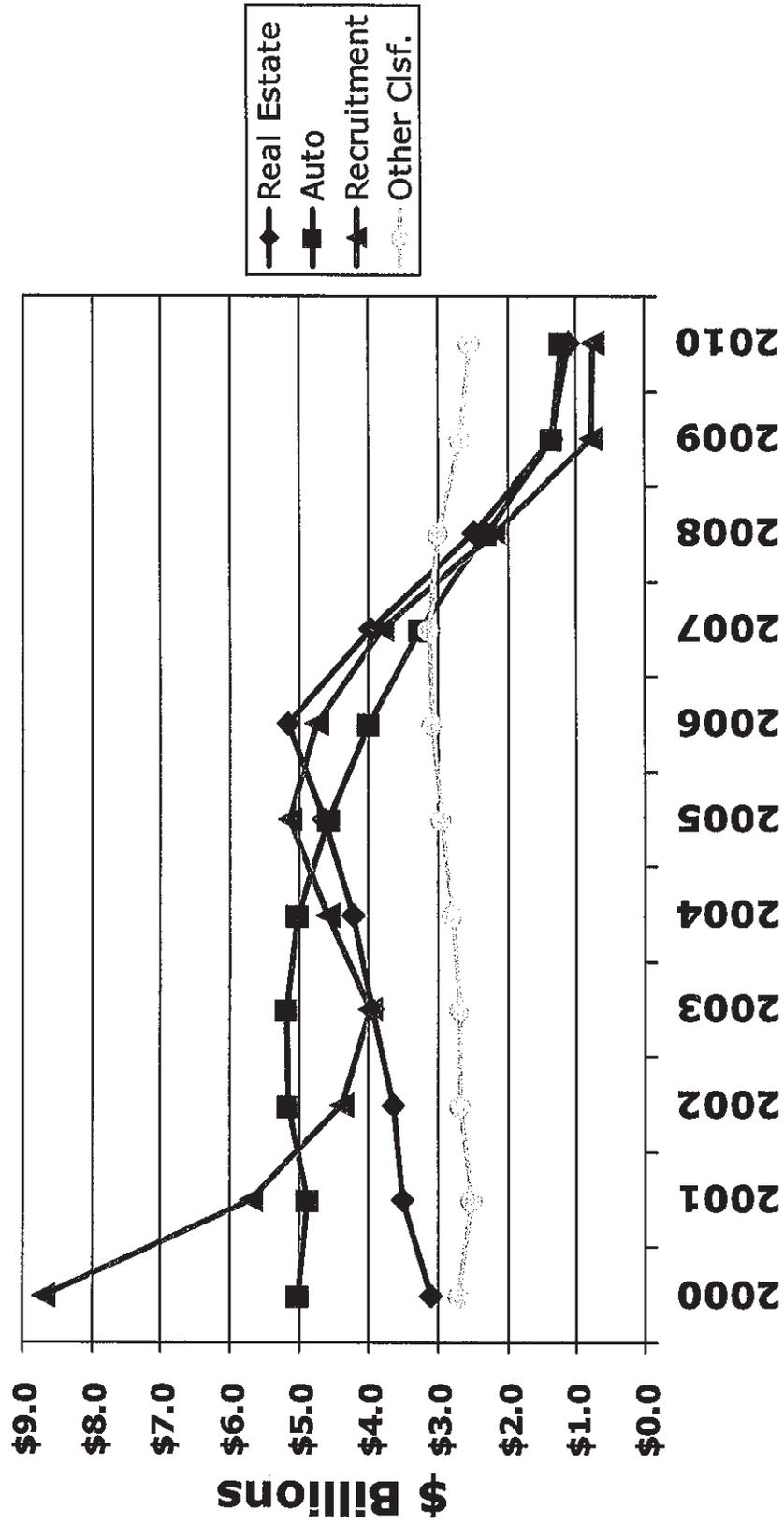


Back to the Future: 2010 = 1965

Classified Share of Newspaper Print Ad \$



Classified Advertising Dollar Volume, 2000 - 2010



Source: NAA

Estimates of Ad Revenue Share, 1980 - 2010

	1980	1985	1990	1995	2000	2005	2010
Newspapers	36.2	36.1	34.6	30.7	27.4	24.1	13.3
Television	20.9	23.2	23.1	25	26	27.9	33.8
Magazines	13.1	11.9	11.5	11.4	10.7	9.8	9.1
Radio	8.8	9.6	9.4	9.8	11.2	10.3	8.8
Out-of-Home	2.4	2.3	2.8	3.0	2.9	3.2	3.6
Directories	6.2	7.2	8.3	7.7	6.9	6.6	4.0
Direct Mail	12.4	9.7	10.3	12.4	10.3	11.7	12.1
Internet					4.6	6.4	15.3

Source: MagnaGlobal, June, 2011

Newspaper Association of America

Estimates of Ad Revenue Share Forecast

	2011	2012	2013	2014	2015	2016
Newspapers	12.6	11.1	10.4	9.6	9.0	8.2
Television	34.5	35.9	35.7	37.1	37.0	38.4
Magazines	8.6	8.2	7.9	7.3	6.9	6.2
Radio	8.6	8.6	8.5	8.3	8.3	8.1
Out-of-Home	3.3	3.8	3.9	4.0	4.2	4.3
Directories	2.7	2.6	2.2	1.8	1.4	1.1
Direct Mail	12.2	11.6	11.7	11.5	11.5	11.3
Internet	17.5	18.3	19.6	20.4	21.7	22.4

Source: MagnaGlobal, June, 2011

Newspaper Association of America

Forecast CAGR 2011 - 2016

Newspapers	-3.7%
Television	6.4%
Broadcast TV	4.3%
Cable TV	8.8%
Internet	9.5%
Paid Search	10.0%
Online Video	17.6%
Mobile	25.1%
Other Internet	6.7%
Magazines	-2.9%
Radio	2.4%
Out-of-Home	7.1%
Directories	-16.4%
Direct Mail	3.0%

Source: MagnaGlobal, June, 2011

Newspaper Association of America