

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
2010 Quadrennial Review – Review of the Commission’s Broadcast Ownership Rules And Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996)	MB Docket No. 09-182
)	
Promoting Diversification of Ownership in the Broadcasting Services)	MB Docket No. 07-294
)	

**COMMENTS OF THE
COALITION TO PRESERVE LOCAL TV BROADCASTING**

**Communications Corporation of America
Granite Broadcasting Corporation
Malara Broadcast Group, Inc.

Mitts Telecasting Company, LLC
National Communications, Inc.
Ramar Communications, Inc.
Woods Communications Corporation**

**Cordillera Communications, Inc.
Local TV, LLC
Meredith Corporation and
KVVU Broadcasting Corp.
MPS Media
New Age Media Broadcasting Group
White Knight Broadcasting, Inc.**

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March 5, 2012

TABLE OF CONTENTS

	<u>Page</u>
TABLE OF CONTENTS.....	i
SUMMARY.....	ii
I. INTRODUCTION	1
II. LOCAL SERVICE AGREEMENTS PROVIDE TANGIBLE PUBLIC INTEREST BENEFITS, SAVE JOBS, AND PRESERVE OR EXPAND LOCAL NEWS IN MID-SIZED AND SMALL MARKETS.	3
A. Local Service Agreements Promote Competition and Diversity By Strengthening Local Television Stations.	3
B. Local Service Agreements Promote Diversity and Localism by Substantially Increasing the Number of Local News Voices in Mid-Sized and Small Markets.	9
C. Local Service Agreements Create and Save Jobs.	13
D. The FCC Should Not Endanger Local Newsgathering Operations in Mid- Sized and Small Markets by Declaring That Local Service Agreements Create Attributable Ownership Interests.....	15
III. THE COMMISSION SHOULD REJECT CALLS TO MAKE RETRANSMISSION CONSENT POLICY THROUGH OWNERSHIP ATTRIBUTION DECISIONS.....	16
IV. CONCLUSION.....	17

SUMMARY

The Coalition to Preserve Local TV Broadcasting (the “Coalition”) consists of 13 television broadcast groups who collectively own 88 television stations across the country, providing free, over-the-air news, weather, sports, political, and entertainment programming in scores of mid-sized and small markets. Each of the Coalition’s members is party to one or more shared services agreements (“SSAs”), joint sales agreements (“JSAs”), news production and/or news sharing agreements, local marketing agreements (“LMAs”), full-power/low power combinations (“LP Combos”), and multicast network affiliations (collectively, “Local Service Agreements”), many of which involve two or more same-market program streams affiliated with the “Big Four” networks of NBC, CBS, ABC, and FOX.

The increased use of Local Service Agreements and station cooperation over the past decade has been the catalyst for an unprecedented expansion of local news production across the country, and particularly in mid-sized and small markets that lack the advertising base to support stand-alone news operations for all or even most stations in the market. Coalition members have been at the forefront of this expansion, initiating newscasts on many stations that never previously aired news and improving the news operations of stations that otherwise would have considered shuttering their news operations.

The flexibility that comes from implementation of Local Service Agreements has been key to these developments, and with the Commission’s knowledge and broadcaster innovation, they have helped preserve and strengthen local news, local programming, and local jobs. The Commission has long recognized that local news is critical to local viewers, and broadcasters have long recognized that high quality local news can be a valuable source of advertising revenues for television stations. Under the current rules, local news is thriving and viewers across the country – particularly those in mid-sized and small markets – are reaping the rewards.

Most remarkable of all, this progress has occurred during a period of radical decline in the economics of local television broadcasting. An influx of new competition from the Internet, cable and satellite, mobile devices, and other consumer entertainment media and the worst economy since the Great Depression have combined to create an extremely challenging environment for local broadcasters seeking to produce original news programming to serve the public's need to know. Today, in most small and mid-sized markets, advertising revenues simply cannot support three or four independent, stand-alone news operations. Yet despite these many challenges, broadcasters in these markets have managed to maintain *and even expand* local news on many stations. This has only been possible through creative use of Local Service Agreements.

The *NPRM* seeks comment on whether two types of Local Service Agreements – Local News Service (“LNS”) agreements and SSAs – should create attributable ownership interests. Such a finding would contradict decades of FCC precedent permitting these agreements without attributing ownership to the parties involved. More importantly for the public interest, requiring attribution for LNS agreements and SSAs would needlessly cause termination of countless local news productions in small and mid-sized markets. Few of the existing Local Service Agreements in those markets would survive because the markets lack the number of stations necessary to satisfy the Commission's 13-year old duopoly standards. Very likely, the Commission will see local news disappear from dozens of stations across the country if it makes these agreements attributable.

In short, any new restriction on innovative Local Service Agreements would undeniably cause small and mid-sized markets to lose local news providers, local jobs, and local outlets of popular broadcast programming. If the Commission considers facts and evidence rather than the baseless rhetoric submitted by commenters that do not produce a single minute of local news and do not understand the economics of broadcast markets, it must reject calls to convert Local Service Agreements into attributable interests.

Preservation of the local news renaissance that has recently occurred in mid-sized and small markets across the country requires nothing less than a forceful declaration from the Commission that Local Service Agreements serve the public interest and that parties to such agreements do not thereby obtain ownership interests in additional stations.

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**COMMENTS OF THE
COALITION TO PRESERVE LOCAL TV BROADCASTING**

The Coalition to Preserve Local TV Broadcasting (the “Coalition”) hereby submits these Comments in response to the *Notice of Proposed Rulemaking* in the above-captioned proceeding.¹ The Coalition is comprised of numerous television broadcast groups that together own 88 full-power television stations which operate in a wide cross-section of television markets across the country, from San Francisco-Oakland-San Jose (DMA #6) to Great Falls, Montana (DMA # 190).² Based on their experience in operating this large number of stations, the Coalition brings a wide range of important viewpoints to this proceeding.

I. INTRODUCTION

The Coalition strongly urges the Commission to use this proceeding to recognize the substantial public interest benefits and the sheer necessity of innovative arrangements between and among television stations in mid-sized (DMAs 51-100) and small markets (DMAs 101-210) and

¹ See 2010 Quadrennial Review – Review of the Commission’s Broadcast Ownership Rules And Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, *Notice of Proposed Rulemaking*, MB Docket Nos. 09-182 and 07-294, FCC 11-186 (rel. Dec. 22, 2011).

² See Appendix B for a list of stations.

affirm that its ownership attribution rules will not stand in the way of improved broadcast service to smaller communities throughout the country. Each of the Coalition's members is party to one or more shared services agreements ("SSAs"), joint sales agreements ("JSAs"), news production and/or news sharing agreements, local marketing agreements ("LMAs"), full-power/low power combinations ("LP Combos"), and multicast network affiliations (collectively, "Local Service Agreements"), many of which involve two or more same-market program streams affiliated with the "Big Four" networks of NBC, CBS, ABC, or FOX. As described in detail below, these agreements have fostered significant improvements in local public service by broadcasters in mid-sized and small markets and have served to strengthen broadcasting nationwide. Through the innovations of the individual members of the Coalition, local resource-sharing agreements have produced stronger television stations and an unprecedented proliferation of local news content and sources. The public has benefitted tremendously from the stronger television stations and the improved service offered by stations participating in SSAs, Local News Service Agreements ("LNSs"), JSAs, LMAs and LP Combos. Given these benefits, the Commission should reject the arguments of parties who would use this proceeding to roll back that progress. Local Service Agreements are nothing less than a broadcaster-developed blueprint for delivering large market-quality service to smaller communities that otherwise could not support it.

The Commission should resist the calls of several parties who earlier in this proceeding sought to punish broadcasters for finding a way to improve service to smaller communities with limited advertising resources. The Commission should not change its ownership attribution rules to further restrict Local Service Agreements for the simple reason that these agreements do not equate with ownership. To the contrary, such agreements respect the framework of the Commission's local ownership restrictions while at the same time giving stations the tools needed to achieve massive improvements in service without diminishing the number of independent station owners in any market. None of the "potential concerns" about Local Service Agreements noted in the *NPRM*

matches the facts that actually exist in mid-sized and small markets. LNSs and SSAs do not reduce news employment or the quality and diversity of news content – they boost it. Moreover, the Commission should definitively reject the claims of certain parties that rising retransmission consent fees somehow justify limiting local broadcasters’ flexibility in serving their communities. The goal of the ownership rules is to maximize the quality and diversity of television broadcast service to viewers – not to improve cable operators’ balance sheets.

II. LOCAL SERVICE AGREEMENTS PROVIDE TANGIBLE PUBLIC INTEREST BENEFITS, SAVE JOBS, AND PRESERVE OR EXPAND LOCAL NEWS IN MID-SIZED AND SMALL MARKETS.

Local Service Agreements unquestionably produce stronger competitors, better service to local communities, and greater diversity of both content and voices in mid-sized and small markets. The Coalition members’ have broad experience providing free, over-the-air news, weather, sports, political, and entertainment programming in scores of these markets. By combining low and full-power stations, affiliating with a network on a multicast channel, or entering into cost-sharing agreements such as LNSs, LMAs, SSAs, or JSAs, the Coalition members’ television stations have strengthened service, providing tangible public interest benefits that otherwise would not be available to local residents.

A. Local Service Agreements Promote Competition and Diversity By Strengthening Local Television Stations.

Operating a television station in small and mid-sized markets today is a tremendous challenge. Advertising remains the dominant source of revenue for local television stations – representing by far the largest portion of overall proceeds.³ Mid-sized and small markets always have presented special difficulties for broadcasters seeking to provide high-quality local service because those markets have fewer consumers and naturally smaller advertising markets.

³ Project for Excellence in Journalism, THE STATE OF THE NEWS MEDIA, AN ANNUAL REPORT ON AMERICAN JOURNALISM, 2011, at 9, *available at* http://stateofthemedias.org/print-chapter/?print_id=5189 (“PEJ 2011 Report”).

Nonetheless, in the days when broadcast television accounted for almost all TV viewing, mid-sized and small advertising markets produced sufficient revenue to support strong local stations.

Both long and short term trends have fundamentally altered the economics of broadcasting in markets outside the Top 50. Over the past 20 years, succeeding waves of competition from cable networks, the Internet, and other new media platforms have significantly diminished local broadcasters' audience share and their corresponding share of local advertising dollars. While the most compelling and most watched programs remain on broadcast television, the ratings for cable networks (and their corresponding share of the local advertising market) have increased steadily over the last fifteen years while the amount of time viewers devote to activities like surfing the Internet and playing video games also continues to erode broadcast audiences.⁴ These shrinking audiences provide shrinking advertising revenue: the average broadcast station in 2010 earned only half the revenue, on an inflation-adjusted basis, it did in 2001.⁵ There is no reason to expect reversal of these long-term trends, and their impact is particularly severe in smaller markets where advertising dollars were more limited from the beginning.

From 2007 to 2009, advertising revenue in all markets fell by twenty-five percent.⁶ This devastating drop in revenue forced all broadcasters to cut costs quickly. Many broadcasters, however, could not weather the recession, could not attract additional financing from lenders and investors, and sought bankruptcy protection. While 2010 and 2011 showed some slight improvement due to increased political ad spending, "stations made almost 20% less in 2010 than in 2006, the last midterm election year, and almost 9% less than in the presidential election year of 2008."⁷

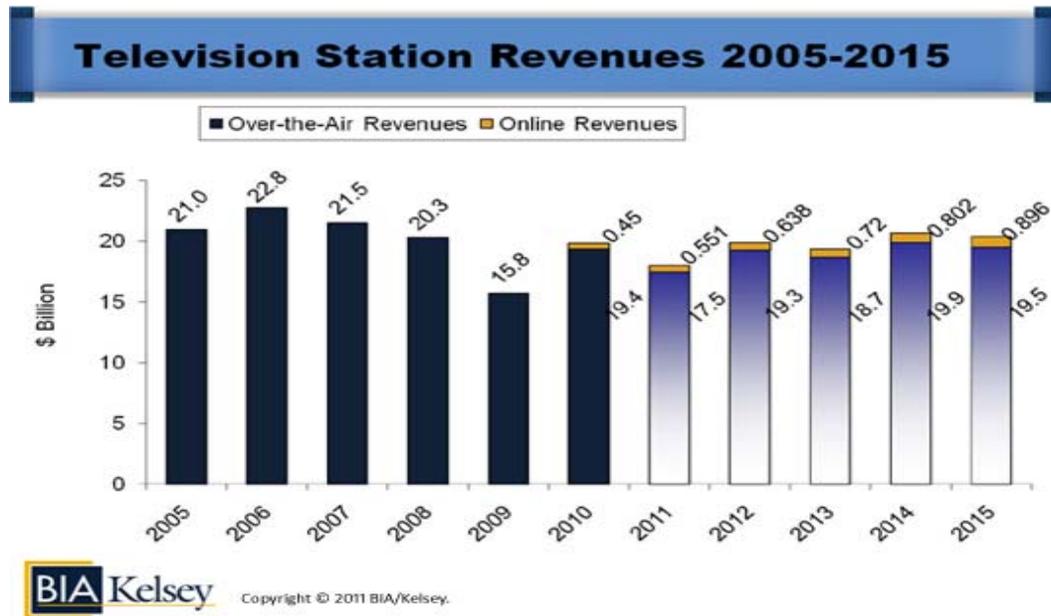
⁴ *Id.* at 1-2, 9. A slightly earlier report showed that spending on cable spot advertising grew by almost 60 percent from 2002 to 2008. *See* Project for Excellence in Journalism, THE STATE OF THE NEWS MEDIA, AN ANNUAL REPORT ON AMERICAN JOURNALISM, 2010, Local TV – Economics at 11, *available at* <http://stateofthedia.org/2010/local-tv-summary-essay/economics/> ("PEJ 2010 Report").

⁵ *Id.* at 13.

⁶ PEJ 2010 Report at Local TV – Economics..

⁷ PEJ 2011 Report at 7.

Moreover, industry analyst BIA/Kelsey has found that broadcasters have regained only a fraction of their recession losses, and station revenues are not expected to return to pre-recession levels for the foreseeable future.⁸

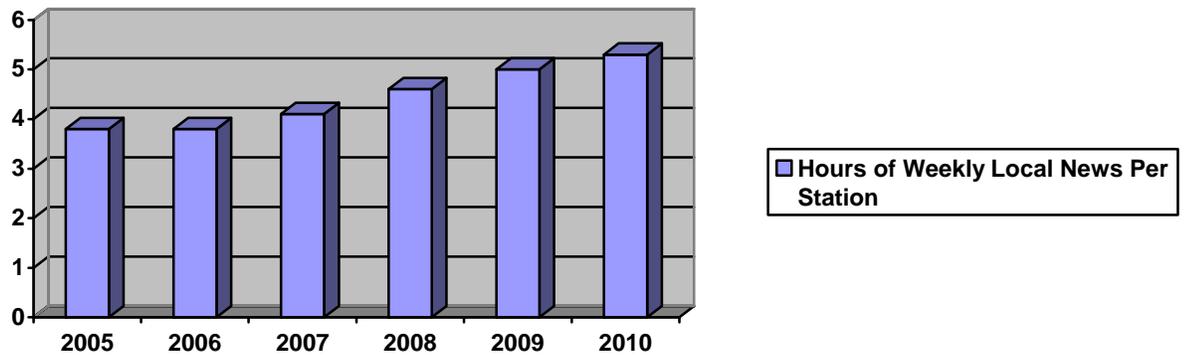


These stark economic realities pose a real and increasing threat to the ongoing viability of independent television stations in mid-sized and small markets and the important local services they provide. Local Service Agreements meet this threat head-on.

And they are working. Despite the decline in the local television broadcasting economy, local broadcasters have risen to the occasion and significantly improved their service to their communities. More local news is available today on over-the-air television than ever before. The average amount of local news on stations with a news department rose to an all-time high of 5.3 hours per weekday in 2010.⁹

⁸ BIA/Kelsey Reports Local Television Revenues Rose 23.2% to \$19.4 Billion in 2010, Driven by Political Campaigns and National Advertising, April 29, 2011, *available at* [http://www.biakelsey.com/Company/Press-Releases/110429-Local-Television-Revenues-Rose-23.2-Percent-to-\\$19.4-Billion-in-2010.asp](http://www.biakelsey.com/Company/Press-Releases/110429-Local-Television-Revenues-Rose-23.2-Percent-to-$19.4-Billion-in-2010.asp).

⁹ Bob Papper, 2011 TV and Radio News Staffing and Profitability Survey, RTDNA/Hofstra University, *available at* http://www.rtdna.org/pages/media_items/2011-tv-and-radio-news-staffing-and-profitability-survey2033.php?id=2033 (“2011 RTDNA Study”).



Sources: RTNDA Staffing and Profitability Surveys, 2006-2011.¹⁰

These figures demonstrate an increase in weekly local news of nearly 40% since the recession began, despite significant station revenue declines. In all likelihood, the record-setting trend will continue, as studies indicate that 36.9 percent of stations nationwide expected to increase local news programming in 2011 compared to only 1 percent that expected to decrease local news programming.¹¹ This trend holds in markets outside the Top 50, with 38.5 percent of stations in markets 51-100 expecting to increase news output and only 1.3 percent expecting to decrease it; with 32.9 percent of stations in markets 101-150 expecting to increase against only 1.2 percent expecting a decrease; and with 26.8% of stations in markets 151+ expecting an increase and no reporting stations expecting a decrease.¹²

Broadcasters in small and mid-sized markets have been able to increase news output consistently over the last decade despite the fifty percent drop in revenue over that same period,¹³ in large part due to the efficiencies derived from Local Service Agreements. These arrangements have allowed broadcasters to share costs and produce more content for less money, which is an absolute necessity for all broadcasters today and particularly for those in smaller markets. In 2011, more than

¹⁰ RTNDA's annual Staffing and Profitability Surveys from 2005 through 2011 are available at <http://www.rtdna.org/pages/research/staffing-and-profitability.php>.

¹¹ 2011 RTDNA Study at Part II.

¹² *Id.*

¹³ *See n. 5, supra.*

one-quarter of television stations with news departments provided news content for another local television station.¹⁴ This percentage has increased since at least 2003, when 19.1 percent of Big Four stations with news departments provided content for other television stations.¹⁵ Whether the content is provided through an LNS, an LMA, an SSA, or a duopoly, the correlation is undeniable. More local news exists today because broadcasters have had the freedom to innovate and enter into contractual arrangements to share costs, thereby ensuring that local stations remain financially healthy and local news programming content remains on the air and sustainable.

Despite these substantial benefits, the *NPRM* cites the Communications Workers of America (“CWA”) and Free Press as arguing that SSAs, for example, are merely sham arrangements to “circumvent the Commission’s multiple ownership rules.”¹⁶ In reality, such arrangements work within the framework of the Commission’s rules and more than two decades of Commission precedent to permit economic relationships between local broadcasters short of actual ownership that lead to stronger local stations and improved local service.

The Commission consistently has stated that SSAs and JSAs serve the public interest. Twenty-six years ago, the Commission ruled that joint sales practices provide “real social benefits” because they allow licensees to “take advantage of economies of scale.”¹⁷ Since then, the Commission has stressed repeatedly the benefits of such arrangements. For example, in 1997, discussing the digital transition, the Commission stated that it would look favorably at joint business arrangements among broadcasters that would increase station productivity and efficiency.¹⁸ Two

¹⁴ *Id.* at Part III.

¹⁵ Bob Papper, 2004 RTDNA/Ball State University Survey, at 4 *available at* <http://www.rtdna.org/media/pdfs/communicator/2004/sep/092004-Research.pdf>.

¹⁶ *See NPRM* at ¶ 200 (citing CWA Comments at 19-20; CWA Reply App. 1.1 at 10; Free Press Comments at 13-14).

¹⁷ Elimination of Unnecessary Broadcast Regulation, *Second Report and Order*, 59 RR 2d 1500, 1515 (1986).

¹⁸ Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, *Fifth Report and Order*, 12 FCC Rcd 12809 (1997) at ¶ 60.

years later, in its *1999 Attribution Order*, the Commission reaffirmed its support for JSAs and SSAs, finding that such arrangements “do not . . . convey a degree of influence or control over station programming or core operations such that they should be attributed” and “may actually help promote diversity by enabling smaller stations to stay on the air,” as well.¹⁹ Since releasing the *1999 Attribution Order*, the Commission has continued to consider SSA and JSA arrangements non-attributable.²⁰ No justification exists for overturning this quarter-century of precedent and imposing new restrictions and obstacles, particularly given today’s challenging economy.²¹ If Local Service Agreements like SSAs served the public interest in the 1980s, 1990s, and 2000s when the local advertising environment was significantly healthier and local markets could support more independent, stand-alone stations, they surely must serve the public interest today.²² And just as

¹⁹ Review of the Commission’s Regulations Governing Attribution of Broadcast and Cable/MDS Interests, *Report and Order*, 14 FCC Rcd 12559 at ¶ 122 (1999) (“*1999 Attribution Order*”).

²⁰ See, e.g., *KFTA-TV, Fort Smith, Arkansas*, 23 FCC Rcd 3528 (Med. Bur. 2008); *WYTV(TV), Youngstown, Ohio*, 22 FCC Rcd 13905 (Med. Bur. 2007); *KOWH(TV), Lincoln, Nebraska*, 20 FCC Rcd 9738 (Med. Bur. 2005).

²¹ As noted in the *NPRM* (at ¶ 197), in 2004, the Commission initiated a proceeding (MB Docket No. 04-256), which focused specifically on, and only on, the attributable ownership status of television JSAs. The record in that proceeding conclusively shows that such agreements lead to superior service to the viewing public and that maintaining the current limited attribution rules for those agreements is strongly in the public interest. See, e.g., Comments of Nexstar Broadcasting, Inc., MB Docket No. 04-256, filed Oct. 27, 2004, at 11 (explaining that the cost savings from JSAs and SSAs allowed certain small market stations to accumulate capital necessary to convert to digital); Comments of Granite Broadcasting Corporation, MB Docket No. 04-256, filed Oct. 27, 2004, at 10-11 (explaining that without JSAs and SSAs some small and mid-sized market stations may no longer be able to afford to produce local news programming). Notably, the parties seeking greater regulation of Local Service Agreements in this proceeding were entirely silent in 2004. Any decision regarding the attribution of JSAs must be based on the complete record assembled in that proceeding.

²² Congress also is well aware of innovative arrangements between local broadcasters. For example, its passage of the Satellite Television Extension and Localism Act of 2010 (“STELA”) confirms that broadcasters must maintain the freedom to utilize innovative ways to expand programming diversity for small and mid-sized markets. In STELA, Congress provided broadcasters with explicit incentives to enter into multicast affiliation agreements to ensure that small markets can receive the full complement of network programming. Congress also provided incentives for broadcasters to utilize low power stations to bring network programming to local markets. See “How the Satellite Television Extension and Localism Act (STELA) Updates Copyright and Carriage Rules for the Retransmission of Broadcast Television Signals,” Congressional Research Service, June 4, 2010, at i (“STELA provides broadcasters two new incentives to use their digital technology to broadcast multiple video streams (to ‘multicast’)... STELA specifically gives broadcasters the incentive to undertake such multicasting to offer otherwise

surely, the evidence reflects that these arrangements do serve the public interest by furthering the Commission's policy goals of promoting competition, diversity, and localism.

B. Local Service Agreements Promote Diversity and Localism by Substantially Increasing the Number of Local News Voices in Mid-Sized and Small Markets.

The *NPRM* cites the concerns of CWA and Free Press that LNS agreements and SSAs are merely cost savings agreements that increase station profits while reducing the number and diversity of outlets capable of covering local news.²³ These characterizations of Local Service Agreements are precisely backwards: Local Service Agreements don't generally involve stations "outsourcing" news services they otherwise would provide themselves; rather, these agreements most frequently result in greater financial health for both stations involved and increased local news airing on more stations in the market.²⁴ In this way, Local Service Agreements – particularly Local News Service agreements and SSAs – have actually been a major factor in increasing diversity and localism in local markets for a long time.

The CWA/Free Press argument would only make sense for mid-sized and small markets if those markets could economically support local news operations from a large number of stations in the market. They cannot. In fact, CWA and Free Press fundamentally misunderstand the economic challenges faced by mid-sized and small local broadcasters and the actual benefits viewers receive from the operation of Local Service Agreements. Without these agreements, many mid-sized and small market broadcasters would be unable to continue providing local news, a result that would decimate the diversity of content and viewpoints currently available and preclude the introduction of

unprovided network programming in so-called 'short markets'—markets that do not have network affiliates for all four major networks.”), 15 (STELA provides broadcasters new incentives to use low power television stations to broadcast network programming).

²³ *NPRM* ¶¶ 198, 200.

²⁴ Indeed, the Commission's own studies confirm that stronger television stations generally provide more news output. FCC, 2007 Ownership Study No. 4, Daniel Shiman, "The Impact of Ownership Structure on Television Stations; News and Public Affairs Programming" (July 24, 2007) at I-21.

new voices into mid-sized and small markets. The negative effects on the Commission’s localism policy would be considerable. Whether out of ignorance or spite, CWA and Free Press misdiagnose LNS agreements and SSAs as *problems*, when in reality these arrangements are *solutions* for preserving and even expanding local news and local programming options in small and mid-sized markets in the face of limited resources, significant cost, intense competition, and strong macroeconomic headwinds.

In most small and mid-sized markets today, the choice that many stations – even Big Four network affiliates – face is stark: they can enter into a contractual arrangement with a local competitor or they can cease providing local news. This economic reality stems from the *undeniable fact* that the advertising base in most small and mid-sized markets cannot support three or four stand-alone television news operations. Local television news is no different than any other business: it must make a profit to survive and grow. If the local market is not large enough to support multiple independent competitors, some of those competitors and/or the service they provide will disappear.

While mid-sized and small markets offer limited advertising revenues to support newsgathering efforts, providing local news to these communities remains extremely expensive. Producing high quality local TV news is expensive. It requires a substantial upfront capital investment in news trucks, cameras, equipment, and a news set. In fact, according to a 2010 study by the National Association of Broadcasters, capital expenses for news represented approximately one-half of the capital budget for broadcast stations in mid-sized and small markets ranked fifty and higher.²⁵ Day-to-day operating expenses also are significant. Broadcasters must hire reporters, anchormen, camera operators, producers, and news directors. According to the NAB Local News Study, the average news operating budget across all markets is \$4.1 million per year.²⁶ In mid-sized

²⁵ Comments of National Association of Broadcasters, GN Docket No. 10-25, Attachment B, “The Economic Realities of Local Television News,” at 13 (“NAB Local News Study”).

²⁶ *Id.* at 13.

and small markets, a smaller advertising base requires a correspondingly disproportionate investment in local news. Indeed, television stations in markets ranked fifty and higher still dedicate approximately 21.7 percent of their operating budget to producing local news.²⁷ The average small and mid-sized market station budgets approximately \$1.8 million per year on capital and operating expenses to provide local news programming. While this estimate is consistent with Coalition members' experiences, these figures actually understate the real cost of local news programming, because the analysis did not account for non-budgeted news expenses, such as coverage of emergencies and other unexpected breaking news events, or the advertising lost in providing wall-to-wall coverage of such local emergencies, Presidential address, elections, and other breaking news.

Local Service Agreements are necessary to permit many stations in mid-sized and smaller markets to undertake the substantial costs necessary to produce local news. The attached Appendix A highlights many of the markets where the economics predict that one or more of even the Big 4 network affiliates would be unable to air local news, but in many of these markets stations are able to air local news by relying on Local Service Agreements.²⁸ Each of the markets where Local Service Agreements permit news represents an expansion of local service and the creation of local jobs.

Thus, while CWA and Free Press claim that allowing Local Service Agreements reduces the number of independent voices available in the local community and that Local Service Agreements generally result in discontinuance of the weaker station's newscast and replacement of that newscast with the rebroadcast of the stronger station's existing newscast,²⁹ numerous concrete examples demonstrate that Local Service Agreements create new, independent newscasts and the local jobs

²⁷ *Id.*

²⁸ *See* Appendix A.

²⁹ *NPRM* at ¶ 199.

that go with them. Examples of the diverse local news services offered by Coalition members pursuant to Local Service Agreements include the following:

- **Granite’s WISE-TV and Malara’s WPTA(TV)** operate under a JSA and SSA in **Fort Wayne, Indiana (DMA #109)**. Pursuant to that agreement, Granite provides news programming, sales, and other back office services for WPTA(TV), and the stations operate from the same tower, sharing a substantial amount of the costs of their transmission infrastructure. Before consummation of the JSA and SSA, WISE-TV was struggling and had planned to cancel its weekend newscast. Instead, with the savings from joint operations, WISE-TV preserved its weekend newscast and WPTA(TV) has been able to add a significant amount of new local news programming. Neither result would have been economically feasible for the stations to provide on its own.
- **ComCorp’s WGMB(TV) and Knight Broadcasting’s WVLA(TV)** have operated pursuant to a JSA and SSA in **Baton Rouge, Louisiana (DMA #94)** since 2007. Prior to that, neither station aired any local news. The stations air new local news in high definition each weekday and a weekly local high school sports round-up show. The stations do not merely repeat the same content -- WGMB(TV) maintains a different look, feel, identity than WVLA(TV) and the other Big Four affiliates in its market.³⁰
- **Cordillera Communications’ KRIS-TV and Sagamorehill Broadcasting’s KZTV(TV)** serve **Corpus Christi, Texas (DMA #129)** pursuant to JSA and SSA agreements that have resulted in the stations maintaining two separate and distinct news voices in the market that originate from separate studios and control rooms. Combined resources also allow the news teams to research and cover more local news for the viewers of Corpus Christi and engage in hard-hitting investigative journalism.
- **Granite’s WEEK-TV and Barrington’s WHOI-TV** entered into a JSA and SSA arrangement to serve **Peoria, Illinois (DMA # 116)** that literally saved WHOI-TV’s news operation without compromising the stations’ editorial independence. Prior to the agreement, Barrington faced a bleak financial future and was considering major staff reductions and news cancellations. As a result of the agreement, Granite made significant investments in both stations’ newsgathering and production operations, preserving the jobs of WHOI-TV’s news personalities and leading to the hiring of two new producers to expand the station’s news coverage. This allowed both stations

³⁰ The consolidated news operations for WGMB(TV) and WVLA(TV) have proven invaluable during local emergencies over the years. For example, during Hurricane Gustav in 2008, the stations were able to provide live wall-to-wall coverage and life saving information to Baton Rouge residents. Without the JSA and SSA, WGMB(TV) and WVLA(TV) likely would not have had a local news operation, and national outlets like the Weather Channel lack the capability to provide the type of crucial local information that saves lives during local emergencies. Throughout the storm and in the few days afterwards, broadcasters regularly lost power and microwave links malfunctioned, but at least one of the stations was on the air and providing emergency information throughout the storm and during its aftermath.

to leverage their combined resources, resulting in coverage of more stories and more in depth coverage of local political races than ever before.

- **ComCorp's KTSM-TV and TTBG's KDBC-TV** have entered into a JSA and SSA for their service to the **El Paso, Texas; Market (DMA #91)**. At the time of the agreements, KDBC-TV had reduced its news coverage and more cuts in news programming were being considered. The cooperation fostered by the JSA and SSA has preserved local news on KDBC-TV, which now anticipates further expansion of its local news operations. KTSM-TV and KDBC-TV have separate anchors, news producers, and brands, and the stations pursue different strategies. KDBC-TV's newscasts focus entirely on local matters: all reporting is done locally, and the station does not include packaged national news segments in its newscasts. KTSM-TV, on the other hand, offers a more traditional mix of local and national news to El Paso viewers.

Other stations have accomplished similar expansions of diversity of local service through multicast network affiliations. For example, Cordillera uses multicast channels of its affiliates in Missoula (DMA #165), Billings (DMA #168), Butte-Bozeman (DMA #189), and Great Falls, Montana (DMA # 190) to provide CW network programming to small markets with too few licensed stations to support stand-alone affiliates, giving Montana residents access to popular broadcast network programming that otherwise would be unavailable.

If the Commission chooses to restrict any of these innovative, service-expanding agreements, most of the mid-sized and small markets described above (and many similar markets) would lose one or more local newscasts and/or entertainment choices that are only possible due to the flexibility these arrangements permit. As local television news operations are canceled or substantially reduced, the diversity of outlets and content and the overall quality and quantity of local content would decline precipitously. That result would be contrary to the Commission's longstanding diversity and localism policies. The Commission should reject that course and instead affirm that Local Service Agreements create substantial localism and diversity benefits that must be preserved.

C. Local Service Agreements Create and Save Jobs.

The contention raised by CWA and Free Press that Local Service Agreements lead to staff reductions that compromise stations' ability to produce high-quality, in-depth news coverage is

simply wrong.³¹ This argument rests on the untenable premise that both stations would separately employ full news departments in the absence of cooperation and ignores the economic realities in mid-sized and small markets. These markets simply cannot support full stand-alone news operations for every station – or even most stations – in every market. The contraction of advertising revenue caused by the recent recession and intense competition from cable, the Internet, and other platforms makes Local Service Agreements necessary to avoid the kind of wholesale elimination of local news jobs that would otherwise occur.

Quite simply, cooperative newsgathering among stations saves and creates jobs in local news gathering. As described above, Local Service Agreements generally result in great increases in both the quality and quantity of local news produced in mid-sized and small markets. Not surprisingly, these increases in news production frequently lead to substantial increases in newsgathering and production jobs in these markets.

Coalition members have achieved similar results throughout the country. Indeed, in most of the examples described above, if the stations had not been able to combine their newsgathering resources, many more jobs and entire news departments would have been lost by requiring separate operations than have been lost due to the combined operations. Without JSAs and SSAs, the news departments of dozens of stations in small and mid-sized markets likely would have shut down or been severely curtailed in most of the markets described above. With these agreements, news departments in these markets are thriving and, in many cases, employing more news staff than the competing stations that have not entered into cooperative arrangements.

³¹ *NPRM* ¶ 198.

D. The FCC Should Not Endanger Local Newsgathering Operations in Mid-Sized and Small Markets by Declaring That Local Service Agreements Create Attributable Ownership Interests.

The substantial public benefits of Local Service Agreements realized under the Commission's current rules would be lost if the FCC decides to make these agreements attributable. If Local Service Agreements are declared to result in attributable ownership interests, operation pursuant to these agreements will immediately stop because few if any of the markets described herein would have a sufficient number of stations to allow duopoly ownership of the stations involved. All of the progress that these stations have made in designing and executing economically viable news operations would be lost, and no solution exists to restore the local news outlets and jobs that would be lost.

CWA and Free Press can afford to ignore the economic realities of mid-sized and small markets in constructing their policy arguments, but the Commission cannot ignore these realities in fashioning federal policy. Viewers in mid-sized and small markets like Peoria, Illinois; Fort Wayne, Indiana; and Corpus Christi, Texas, deserve the same high-quality local news provided to viewers in larger markets. Making Local Service Agreements attributable would render that result impossible. Viewers in small towns across the country should not be deprived of local news due to the unsupported fears of Washington, D.C.-based lobbying organizations.

A Commission decision finding Local Service Agreements attributable would essentially be a message to America's small towns that they can not have broadcast television news. That is a message the Commission should not send and a result that the Commission cannot reach consistent with its decades-old policies promoting localism, diversity, and competition in local television markets.

III. THE COMMISSION SHOULD REJECT CALLS TO MAKE RETRANSMISSION CONSENT POLICY THROUGH OWNERSHIP ATTRIBUTION DECISIONS.

While it cites concerns raised by the American Cable Association (“ACA”) regarding the supposed negative impact of Local Service Agreements on retransmission consent negotiations,³² the Commission wisely has avoided seeking comment on these allegations. The comments of ACA in response to the Commission’s *NOI* in this proceeding attacking Local Service Agreements are a transparent attempt to manipulate the Commission’s ownership rules to gain leverage in private retransmission consent negotiations. The Commission has rightly resisted that invitation.

The Commission’s ownership and attribution rules are about optimizing over-the-air television service to local communities across the country, not maintaining cable operators’ bottom line profits. The suggestion that the Commission should contort its ownership rules to address a retransmission consent policy issue is absurd. Equally absurd is the notion that joint negotiation of retransmission consent agreements by parties to Local Service Agreements will have a significant impact on cable rates when local cable operators pay ESPN on average more than 7 times the total they pay to every broadcast station in the market.³³ Irrespective of the merit or lack thereof of cable operators’ arguments on these points, the Commission opened a separate docket considering retransmission consent rules, and the record in that proceeding, not this one, provides the only legitimate basis for considering possible changes to the retransmission consent rules.³⁴

³² *NPRM* ¶ 200.

³³ *See, e.g.*, Comments of Local Broadcasters Coalition, MB Docket No. 10-71, filed May 18, 2010, at 7 (“Coalition Comments”) (noting that ESPN receives 18.5% of all programming fees but only accounts for 1.3% of the national audience share, while local broadcasters receive only 2.5% of programming fees but account for 40% of the audience share).

³⁴ *See* Amendment of the Commission’s Rules Related to Retransmission Consent, *Notice of Proposed Rulemaking*, MB Docket No. 10-71, FCC 11-31 (released March 3, 2011). To the extent cable operators continue to argue that higher retransmission consent rates charged by parties to Local Service Agreements will lead to higher cable rates, those allegations have been fully refuted by broadcasters in the retransmission consent proceeding. *See, e.g.*, Comments of Local Broadcasters Coalition, MB Docket No. 10-71, filed May 18, 2010.

The fact remains that retransmission consent fees comprise a small portion of the programming fees that distributors pay each year despite the fact that local TV stations account for 40 percent of total cable viewership.³⁵ Cable operators have been free-riding on broadcasters' audience strength for decades and have used the fees they should have been paying to broadcasters to subsidize a cable programming market with per-subscriber fees that are highly disproportionate in view of the audiences those channels deliver. If cable operators want to protect their bottom lines, they should start by reducing fees for the channels few viewers watch rather than seeking to impair local service through broadcast ownership rule changes.

Even a cursory review of local markets demonstrates that some cable operators' minor, flawed arguments against Local Service Agreements are vastly outweighed by the improved local service that Local Service Agreements permit broadcasters to provide. In short, cable operators provide absolutely no local service in almost all of their markets and cable news operations are unheard of in the mid-sized and small markets served by the Coalition members.

Rather than crafting media ownership rules to ensure higher profits for the members of ACA, the Commission instead must consider the public interest. A focus on the public, rather than on the misplaced complaints of these cable parties, reveals the many benefits that innovative arrangements between broadcasters produce for local markets that otherwise would be unavailable. That fact should drive policy in this area, and no argument from the cable operators should deter the Commission from protecting the important local public benefits these Local Service Agreements provide.

IV. CONCLUSION

Due to the weak economy and irrevocable changes to local media markets, conditions of local television markets are rapidly changing, and production of local news is becoming more and

³⁵ See, e.g., Coalition Comments, *supra*. n.34.

APPENDIX A

Economics of Markets with JSAs and SSAs

This Appendix provides an analysis of selected small and mid-sized television markets. For each market, the Appendix provides estimated revenue and costs associated with producing local news on each Big Four station. 2009 and 2010 were selected because these are the two most recent years for which data is available, and by selecting two consecutive years, the data would not overemphasize the lower revenue traditionally earned by television stations in a non-political year. The sources are as follows:

- 2010 Revenue:** BIA ADVISORY SERVICES, LLC, INVESTING IN TELEVISION (1st Ed. 2011);
- 2009 Revenue:** BIA ADVISORY SERVICES, LLC, INVESTING IN TELEVISION (4th Ed. 2010);
- 2009-2011 Revenue from Local News:** 2010 and 2011 RTDNA Studies estimate that revenue from local news operations generates an average of approximately 45 percent of a station’s total revenue; and¹
- Average Cost of Local News:** 2010 NAB Local News Study²

The tables in the following pages confirm that the relatively low revenue base in many small and mid-sized markets simply does not permit four independent television news operations. In particular, the stations in the selected markets that are predicted to suffer a loss from operating an independent news operation either (A) do not broadcast local news, or (B) broadcast local news only in conjunction with an SSA or other local news sharing arrangement.

In the tables below, “SSA” refers to any JSA and/or SSA arrangement.

Market: Springfield, MO (#75)						
Average Total Revenue 2009-2010: \$42,050,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 51-100	Estimated Net Profit or Loss from News Operations
KSPR	ABC	Perkin Media (SSA with Schurz)	\$4,037,500	\$1,816,875	\$2,668,849	-\$851,974
KOLR	CBS	Mission Broadcasting	\$11,150,000	\$5,017,500	\$2,668,849	\$2,348,651
KRBK	FOX	Koplar	N/A	N/A	N/A	N/A
KYTV	NBC	Schurz Comm. (SSA with Parkin)	\$16,637,500	\$7,486,875	\$2,668,849	\$4,818,026
<p>Comments: KRBK(TV) became the Fox affiliate for the Springfield market in September 2011. Thus revenue data for the station as a Fox affiliate from 2009 and 2010 is not available. The station does not provide local news.</p> <p>The other three stations in the market all provide local news. The data indicates that without the SSA between Perkin and Schurz, KSPR(TV) would not be able to produce its own independent local news.</p>						

¹ See Bob Papper, Hofstra University, 2011 TV and Radio News Staffing and Profitability Survey, Part I; 2010 TV and Radio News Staffing and Profitability Survey, Part II, available at http://www.rtdna.org/pages/media_items/2011-tv-and-radio-news-staffing-and-profitability-survey2033.php?id=2033.

² 2010 NAB Local News Study, at 13.

Market: Paducah-Cape Girardeau-Harrisburg-Mt. Vernon (#81)						
Average Total Revenue 2009-2010: \$35,400,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 51-100	Estimated Net Profit or Loss from News Operations
WSIL	ABC	WSIL TV Inc.	\$6,625,000	\$2,981,250	\$2,668,849	\$312,401
KFVS	CBS	Raycom	\$12,925,000	\$5,816,250	\$2,668,849	\$3,147,401
KBSI	FOX	Sinclair	\$4,300,000	\$1,935,000	\$2,668,849	-\$733,849
WPSD	NBC	Paxton Media Group	\$10,075,000	\$4,533,750	\$2,668,849	\$1,864,901
Comments: All four stations offer local news. Raycom produces the local news for KBSI(TV) pursuant to a news sharing agreement. The data indicates that without an agreement with Raycom, KBSI(TV) would not be able to provide an independent newscast.						

Market: Champaign-Springfield-Decatur, IL (#82)						
Average Total Revenue 2009-2010: \$39,250,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 51-100	Estimated Net Profit or Loss from News Operations
WICS	ABC	Sinclair	\$12,012,500	\$5,405,625	\$2,668,849	\$2,736,776
WCIA	CBS	Nexstar	\$12,112,500	\$5,450,625	\$2,668,849	\$2,781,776
WRSP	FOX	GOCOM Media	\$5,137,500	\$2,311,875	\$2,668,849	-\$356,974
WAND	NBC	Block Comm.	\$7,925,000	\$3,566,250	\$2,668,849	\$897,401
Comments: All four stations offer local news. Sinclair produces the local news for WRSP(TV) pursuant to a news sharing agreement. The data indicates that without an agreement with Sinclair, WRSP(TV) would not be able to provide an independent newscast.						

Market: Chattanooga, TN (#86)						
Average Total Revenue 2009-2010: \$37,400,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 51-100	Estimated Net Profit or Loss from News Operations
WTVC	ABC	Freedom Broadcasting	\$12,737,500	\$5,731,875	\$2,668,849	\$3,063,026
WDEF	CBS	Morris Multimedia	\$7,387,500	\$3,324,375	\$2,668,849	\$655,526
WDSI	FOX	CP Media	\$5,250,000	\$2,362,500	\$2,668,849	-\$306,349
WRCB	NBC	Sarkes Tarzian Inc.	\$10,387,500	\$4,674,375	\$2,668,849	\$2,005,526
Comments: All four stations offer local news. WTVC(TV) shares certain of its news personnel with WDSI(TV) and provides other services to WDSI(TV). The data indicates that without this arrangement between WTVC(TV) and WDSI(TV), CP Media would not be able to provide an independent newscast.						

Market: Cedar Rapids-Waterloo-Iowa City & Dubuque, IA (#89)						
Average Total Revenue 2009-2010: \$37,550,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 51-100	Estimated Net Profit or Loss from News Operations
KCRG	ABC	Gazette Communications	\$14,750,000	\$6,637,500	\$2,668,849	\$3,968,651
KGAN	CBS	Sinclair (SSA With Second Generation)	\$5,000,000	\$2,250,000	\$2,668,849	-\$418,849
KFXA	FOX	Second Generation (SSA with Sinclair)	\$4,975,000	\$2,238,750	\$2,668,849	-\$430,099
KWWL	NBC	Quincy	\$11,562,500	\$5,203,125	\$2,668,849	\$2,534,276
Comments: All four stations provide local news. The data indicates that, without the SSA between Sinclair and Second Generation, <u>neither station</u> would be able to produce its own independent local news.						

Market: Savannah, Georgia (#92)						
Average Total Revenue 2009-2010: \$38,850,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 51-100	Estimated Net Profit or Loss from News Operations
WJCL	ABC	New Vision Television (SSA with Parkin)	\$4,737,500	\$2,131,875	\$2,668,849	-\$536,974
WTOC	CBS	Raycom	\$16,500,000	\$7,425,000	\$2,668,849	\$4,756,151
WTGS	FOX	Parkin (SSA with New Vision Television)	\$5,950,000	\$2,677,500	\$2,668,849	\$8,651
WSAV	NBC	Media General	\$10,662,500	\$4,798,125	\$2,668,849	\$2,129,276
Comments: All four stations provide local news. Without the SSA between New Vision Television and Parkin, the data indicates that WJCL(TV) would not be able to sustain local news. In addition, in 2009 revenue for WTGS was substantially lower, and the data indicates that the station would have lost \$13,849 from its local news operations. Thus, without the SSA local news may not have been possible on either station.						

Market: Burlington, VT-Plattsburgh, NY (#95)						
Average Total Revenue 2009-2010: \$26,400,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 51-100	Estimated Net Profit or Loss from News Operations
WVNY	ABC	Lambert (SSA with Smith Media)	\$3,512,500	\$1,580,625	\$2,668,849	-\$1,088,224
WCAX	CBS	Mt. Mansfield	\$10,312,500	\$4,640,625	\$2,668,849	\$1,971,776
WFFF	FOX	Smith Media (SSA with Lambert)	\$4,787,500	\$2,154,375	\$2,668,849	-\$514,474
WPTZ	NBC	Hearst	\$7,450,000	\$3,352,500	\$2,668,849	\$683,651
Comments: All four stations provide local news. Without the SSA between Smith Media and Lambert, the data indicates that <u>neither station</u> would be able to sustain an independent local news operation.						

Market: Tri-Cities, TN-VA (#96)						
Average Total Revenue 2009-2010: \$33,300,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 51-100	Estimated Net Profit or Loss from News Operations
WKPT	ABC	Holston Valley	\$1,700,000	\$765,000	\$2,668,849	-\$1,903,849
WJHL	CBS	Media General	\$11,625,000	\$5,231,250	\$2,668,849	\$2,562,401
WEMT	FOX	Esteem Broadcasting (SSA with Bonten)	\$4,712,500	\$2,120,625	\$2,668,849	-\$548,224
WCYB	NBC	Bonten (SSA with Esteem)	\$13,287,500	\$5,979,375	\$2,668,849	\$3,310,526
<p>Comments: As the economics predict, WKPT-TV does not provide any traditional local newscasts. Instead, WKPT(TV) provides short news updates during the day. The other three stations do provide local news. The data also indicates that without the SSA, WEMT(TV) would not be able to produce its own independent local news.</p>						

Market: Augusta, GA (#111)						
Average Total Revenue 2009-2010: \$29,900,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
WJBF	ABC	Media General (SSA with Schurz)	\$13,125,000	\$5,906,250	\$1,637,455	\$4,268,795
WRDW	CBS	Gray Television	\$8,862,500	\$3,988,125	\$1,637,455	\$2,350,670
WFXG	FOX	Raycom	\$4,812,500	\$2,165,625	\$1,637,455	\$528,170
WAGT	NBC	Schurz Comm. (SSA with Media General)	\$2,387,500	\$1,074,375	\$1,637,455	-\$563,080
<p>Comments: All four stations provide local news. The data indicates that without the SSA between Media General and Schurz, WAGT(TV) would not provide local news.</p>						

Market: Sioux Falls-Mitchell, SD (#113)						
Average Total Revenue 2009-2010: \$25,300,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
KSFY	ABC	Hoak Media	\$6,537,500	\$2,941,875	\$1,637,455	\$1,304,420
KELO	CBS	New Young Broadcasting	\$12,600,000	\$5,670,000	\$1,637,455	\$4,032,545
KTTW	FOX	Independent Comm. Inc.	\$1,650,000	\$742,500	\$1,637,455	-\$894,955
KDLT	NBC	Red River Broadcasting Co.	\$3,950,000	\$1,777,500	\$1,637,455	\$140,045
<p>Comments: As the economics predict, KTTW(TV) does not provide local news. The other three stations provide local news.</p>						

Market: Peoria, IL (#116)						
Average Total Revenue 2009-2010: \$29,850,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
WHOI	ABC	Barrington Broadcasting (SSA with Granite)	\$3,737,500	\$1,681,875	\$1,637,455	\$44,420
WMBD	CBS	Nexstar	\$7,687,500	\$3,459,375	\$1,637,455	\$1,821,920
WYZZ	FOX	Sinclair	\$2,387,500	\$1,074,375	\$1,637,455	-\$563,080
WEEK	NBC	Granite Broadcasting (SSA with Barrington)	\$15,400,000	\$6,930,000	\$1,637,455	\$5,292,545
<p>Comments: All four stations provide local news. WMBD(TV) produces the local newscast for WYZZ(TV) under a news sharing agreement. The data indicates that if Nexstar did not produce local news for WYZZ(TV), the station would not be able to provide its own local news.</p>						

Market: Montgomery, AL (#119)						
Average Total Revenue 2009-2010: \$29,500,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
WNCF	ABC	SagamoreHill Broadcasting (SSA with Bahakel)	\$3,062,500	\$1,378,125	\$1,637,455	-\$259,330
WAKA	CBS	Bahakel Comm. (SSA with SagamoreHill)	\$7,275,000	\$3,273,750	\$1,637,455	\$1,636,295
WCOV	FOX	Woods Comm. Corp.	\$1,800,000	\$810,000	\$1,637,455	-\$827,455
WSFA	NBC	Raycom	\$15,950,000	\$7,177,500	\$1,637,455	\$5,540,045
<p>Comments: All four stations provide local news. Bahakel produces local news for WCOV(TV). The data indicates that without the SSA between SgamoreHill and Bahakel, WNCF(TV) would not be able to provide local news programming. In addition, without the news sharing agreement between WAKA(TV) and WCOV(TV), WCOV(TV) would not provide local news.</p>						

Market: Traverse City-Cadillac, MI (#120)						
Average Total Revenue 2009-2010: \$23,100,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
WGTU	ABC	Tucker (SSA with Barrington)	\$3,000,000	\$1,350,000	\$1,637,455	-\$287,455
WWTV	CBS	Heritage Broadcast Group	\$9,500,000	\$4,275,000	\$1,637,455	\$2,637,545
WFQX	FOX	Cadillac Telecasting (SSA with Heritage)	\$2,600,000	\$1,170,000	\$1,637,455	-\$467,455
WPBN	NBC	Barrington Broadcasting	\$7,875,000	\$3,543,750	\$1,637,455	\$1,906,295
Comments: All four stations provide local news. Without the SSA arrangements between Tucker and Barrington and between Cadillac and Heritage, the data indicates that neither WGTU(TV) nor WFQX(TV) would be able to sustain an independent local news operation. Indeed, until recently WGTU(TV) did not provide local news.						

Market: Columbus, GA (#127)						
Average Total Revenue 2009-2010: \$21,900,000						
Station	Network	Ownership	2010 Revenue	2010 Revenue from Local News	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
WTVM	ABC	Raycom (SSA with Southeastern)	\$9,137,500	\$4,111,875	\$1,637,455	\$2,474,420
WRBL	CBS	Media General	\$5,837,500	\$2,626,875	\$1,637,455	\$989,420
WXTX	FOX	Southeastern (SSA with Raycom)	\$3,550,000	\$1,597,500	\$1,637,455	-\$39,955
WLTZ	NBC	SagamoreHill Broadcasting	\$2,775,000	\$1,248,750	\$1,637,455	-\$388,705
Comments: All four stations provide local news. Without the SSA between Raycom and Southeastern, the data indicates that WXTX(TV) would not be able to sustain local news programming.						

Market: Corpus Christi, TX (#129)						
Average Total Revenue 2009-2010: \$30,650,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
KIII	ABC	London Broadcasting Co.	\$10,650,000	\$4,792,500	\$1,637,455	\$3,155,045
KZTV	CBS	SagamoreHill Broadcasting (SSA with Evening Post)	\$5,350,000	\$2,407,500	\$1,637,455	\$770,045
KUQI	FOX	High Maintenance	\$1,487,500	\$669,375	\$1,637,455	-\$968,080
KRIS	NBC	Evening Post (SSA with SagamoreHill)	\$7,187,500	\$3,234,375	\$1,637,455	\$1,596,920
Comments: As the economics predict, KUQI(TV) does not provide local news. The other three stations provide local news.						

Market: Amarillo, TX (#130)						
Average Total Revenue 2009-2010: \$19,350,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
KVII	ABC	Barrington Broadcasting	\$5,025,000	\$2,261,250	\$1,637,455	\$623,795
KFDA	CBS	Drewry Comm.	\$7,000,000	\$3,150,000	\$1,637,455	\$1,512,545
KCIT	FOX	Mission Broadcasting (SSA with Nexstar)	\$2,550,000	\$1,147,500	\$1,637,455	-\$489,955
KAMR	NBC	Nexstar (SSA with Mission)	\$3,612,500	\$1,625,625	\$1,637,455	-\$11,830
Comments: All four stations provide local news. Without the SSA between Nexstar and Mission, the data indicates that <u>neither KCIT nor KAMR</u> would be able to sustain local news programming.						

Market: Chico-Redding, CA (#131)						
Average Total Revenue 2009-2010: \$15,050,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
KRCR	ABC	Bonten Media Group	\$3,975,000	\$1,788,750	\$1,637,455	\$151,295
KHSL	CBS	Catamount Holdings (SSA with Evans)	\$3,462,500	\$1,558,125	\$1,637,455	-\$79,330
KCVU	FOX	Sainte Ltd.	\$2,800,000	\$1,260,000	\$1,637,455	-\$377,455
KNVN	NBC	Evans Broadcasting (SSA with Catamount)	\$3,275,000	\$1,473,750	\$1,637,455	-\$163,705
Comments: As the economics predict, KCVU(TV) does not provide local news. The other three stations in the market offer local news. The data indicates that without the SSA between Evans and Catamount, <u>neither KHSL(TV) nor KNVN(TV)</u> could sustain local news.						

Market: Wilmington, NC (#132)						
Average Total Revenue 2009-2010: \$20,850,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
WWAY	ABC	Morris Multimedia	\$5,575,000	\$2,508,750	\$1,637,455	\$871,295
WILM	CBS	Capitol Broadcasting Co.	\$2,487,500	\$1,119,375	\$1,637,455	-\$518,080
WSFX	FOX	Southeastern (SSA with Raycom)	\$4,012,500	\$1,805,625	\$1,637,455	\$168,170
WECT	NBC	Raycom (SSA with Southeastern)	\$9,450,000	\$4,252,500	\$1,637,455	\$2,615,045
Comments: As the economics predict, WILM does not provide local news. The other three stations provide local news.						

Market: Columbus-Tupelo-West Point, MS (#133)						
Average Total Revenue 2009-2010: \$13,450,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
WKDH	ABC	Southern Broadcasting Inc. (SSA with WTVA)	\$787,500	\$354,375	\$1,637,455	-\$1,283,080
WCBI	CBS	Morris Multimedia	\$4,600,000	\$2,070,000	\$1,637,455	\$432,545
WLOV	FOX	Lingard Broadcasting (SSA with WTVA)	\$2,350,000	\$1,057,500	\$1,637,455	-\$579,955
WTVA	NBC	Spain Family (SSA with WKDH and WLOV)	\$5,237,500	\$2,356,875	\$1,637,455	\$719,420
Comments: WKDH(TV) does not provide local news. The other three stations offer local news. The data indicates that without the SSA between WTVA(TV) and WLOV(TV), WLOV(TV) would not be able to sustain local news.						

Market: Wausau-Rhineland, WI (#135)						
Average Total Revenue 2009-2010: \$21,150,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
WAOW	ABC	Quincy	\$6,325,000	\$2,846,250	\$1,637,455	\$1,208,795
WSAW	CBS	Gray Television	\$7,625,000	\$3,431,250	\$1,637,455	\$1,793,795
WFXS	FOX	Davis Television	\$2,537,500	\$1,141,875	\$1,637,455	-\$495,580
WJFW	NBC	Rockfleet Holdings	\$4,000,000	\$1,800,000	\$1,637,455	\$162,545
Comments: All four stations provide local news. WAOW(TV) produces local news for WFXS(TV). The data indicates that without the news sharing agreement, WFXS(TV) would not be able to sustain local news.						

Market: Monroe, LA-El Dorado, AR (#137)						
Average Total Revenue 2009-2010: \$15,900,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
KAQY	ABC	Parker Broadcasting (SSA with Hoak)	\$1,937,500	\$871,875	\$1,637,455	-\$765,580
KNOE	CBS	Hoak Media (SSA with Parker)	\$8,562,500	\$3,853,125	\$1,637,455	\$2,215,670
KARD	FOX	Nexstar (SSA with Mission)	\$1,862,500	\$838,125	\$1,637,455	-\$799,330
KTVE	NBC	Mission Broadcasting (SSA with Nexstar)	\$2,725,000	\$1,226,250	\$1,637,455	-\$411,205
<p>Comments: All four stations provide local news. Without the SSA between Mission and Nexstar, and between Hoak and Parker the data indicates that <u>KAQY(TV), KARD(TV), and KTVE(TV)</u> would not provide local news in this market. Indeed, until recently, KAQY(TV) did not provide local news.</p>						

Market: Duluth, MN-Superior, WI (#139)						
Average Total Revenue 2009-2010: \$16,100,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
WDIO	ABC	Hubbard Broadcasting	\$4,300,000	\$1,935,000	\$1,637,455	\$297,545
KDLH	CBS	Malara Broadcasting (SSA with Granite)	\$2,775,000	\$1,248,750	\$1,637,455	-\$388,705
KQDS	FOX	KQDS Acquisition	\$2,025,000	\$911,250	\$1,637,455	-\$726,205
KBJR	NBC	Granite Broadcasting (SSA with Malara)	\$5,950,000	\$2,677,500	\$1,637,455	\$1,040,045
<p>Comments: All four stations provide local news. The owner of KQDS(TV) also owns several local radio stations. The data indicates that without the SSA between Granite and Malara, KDLH(TV) would not be able to sustain local news programming.</p>						

Market: Wichita Falls, TX-Lawton, OK (#142)						
Average Total Revenue 2009-2010: \$17,000,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
KSWO	ABC	Drewry Comm. (SSA with Hoak)	\$5,075,000	\$2,283,750	\$1,637,455	\$646,295
KAUZ	CBS	Hoak Media (SSA with Drewry)	\$3,262,500	\$1,468,125	\$1,637,455	-\$169,330
KJTL	FOX	Mission Broadcasting (SSA with Nexstar)	\$1,950,000	\$877,500	\$1,637,455	-\$759,955
KFDX	NBC	Nexstar (SSA with Mission)	\$6,112,500	\$2,750,625	\$1,637,455	\$1,113,170
Comments: All four stations provide local news. The data indicates that without the SSA between Drewry and Hoak, KAUZ(TV) would not be able to sustain local news operations, and without the SSA between Mission and Nexstar KJTL(TV) would not provide local news.						

Market: Lubbock, TX (#143)						
Average Total Revenue 2009-2010: \$24,000,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
KAMC	ABC	Mission Broadcasting (SSA with Nexstar)	\$3,250,000	\$1,462,500	\$1,637,455	-\$174,955
KLBK	CBS	Nexstar (SSA with Mission)	\$4,162,500	\$1,873,125	\$1,637,455	\$235,670
KJTV	FOX	Ramar Comm. Inc.	\$3,475,000	\$1,563,750	\$1,637,455	-\$73,705
KCBD	NBC	Raycom	\$10,712,500	\$4,820,625	\$1,637,455	\$3,183,170
Comments: All four stations provide local news. Ramar also owns KXTQ-CA, which is the Telemundo affiliate in this market. KXTQ-CA offers Spanish-language news for the Lubbock market. The data indicates that without the efficiencies from common ownership of KJTV(TV) and KXTQ-CA, Ramar would not be able to provide local news on KJTV(TV). In addition, without the SSA between Nexstar and Mission, KAMC(TV) would not be able to sustain local news.						

Market: Erie, PA (#146)						
Average Total Revenue 2009-2010: \$18,800,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
WJET	ABC	Nexstar (SSA with Mission)	\$7,750,000	\$3,487,500	\$1,637,455	\$1,850,045
WSEE	CBS	Lilly Broadcasting of PA (SSA with SJL)	\$4,050,000	\$1,822,500	\$1,637,455	\$185,045
WFXP	FOX	Mission Broadcasting (SSA with Nexstar)	\$1,950,000	\$877,500	\$1,637,455	-\$759,955
WICU	NBC	SJL Holdings (SSA with Lilly)	\$4,687,500	\$2,109,375	\$1,637,455	\$471,920
Comments: All four stations provide local news. The data indicate that without the SSA between Nexstar and Mission, WFXP(TV) would not be able to provide local new.						

Market: Sioux City, IA (#147)						
Average Total Revenue 2009-2010: \$16,150,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
KCAU	ABC	Citadel Comm.	\$3,800,000	\$1,710,000	\$1,637,455	\$72,545
KMEG	CBS	Waitt (SSA with TTBG)	\$3,000,000	\$1,350,000	\$1,637,455	-\$287,455
KPTH	FOX	TTBG LLC (SSA with Waitt)	\$2,425,000	\$1,091,250	\$1,637,455	-\$546,205
KTIV	NBC	Quincy	\$6,700,000	\$3,015,000	\$1,637,455	\$1,377,545
Comments: All four stations provide local news. Without the SSA between TTBG and Waitt, the data indicates that neither station would be able to sustain its own independent local news operations.						

Market: Anchorage, AK (#148)						
Average Total Revenue 2009-2010: \$27,350,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
KYUR	ABC	Vision Alaska (SSA with Coastal)	\$4,337,500	\$1,951,875	\$1,637,455	\$314,420
KTVA	CBS	Affiliated Media	\$6,575,000	\$2,958,750	\$1,637,455	\$1,321,295
KTBY	FOX	Coastal TV Broadcasting (SSA with Vision Alaska)	\$3,212,500	\$1,445,625	\$1,637,455	-\$191,830
KTUU	NBC	Schurz Comm.	\$11,050,000	\$4,972,500	\$1,637,455	\$3,335,045
Comments: All four stations provide local news. The data indicates that without the SSA between Vision and Coastal, KTBY(TV) would not be able to sustain local news.						

Market: Joplin, MO-Pittsburg, KS (#149)						
Average Total Revenue 2009-2010: \$18,800,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 101-150	Estimated Net Profit or Loss from News Operations
KODE	ABC	Mission Broadcasting (SSA with Nexstar)	\$3,512,500	\$1,580,625	\$1,637,455	-\$56,830
KOAM	CBS	Saga Comm. Inc. (SSA with Surtsey)	\$7,450,000	\$3,352,500	\$1,637,455	\$1,715,045
KFJX	FOX	Surtsey Productions (SSA with Saga)	\$3,700,000	\$1,665,000	\$1,637,455	\$27,545
KSNF	NBC	Nexstar (SSA with Mission)	\$3,737,500	\$1,681,875	\$1,637,455	\$44,420
<p>Comments: All four stations provide local news. The data indicates that without the SSA between Mission and Nexstar, KODE(TV) would not be able to provide local news. In addition, in 2009 revenue for KFJX(TV) and KSNF(TV) was substantially lower and the data indicates that KFJX(TV) would have lost \$107,455 from its local news operations and KSNF(TV) would have lost \$242,455 from providing local news. Thus, without their respective SSAs local news may not have been possible on either station.</p>						

Market: Minot-Bismarck-Dickinson, ND (#152)						
Average Total Revenue 2009-2010: \$15,000,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 151 and above	Estimated Net Profit or Loss from News Operations
KBMY	ABC	Forum Comm.	\$650,000	\$292,500	\$1,071,123	-\$778,623
KXMC	CBS	Reiten Television	\$6,687,500	\$3,009,375	\$1,071,123	\$1,938,252
KNDX	FOX	John B. Tupper	\$1,437,500	\$646,875	\$1,071,123	-\$424,248
KFYR	NBC	Hoak Media	\$6,100,000	\$2,745,000	\$1,071,123	\$1,673,877
<p>Comments: As the economics predict, KNDX(TV) and KBMY(TV) do not offer a local newscast. The other two stations do provide local news.</p>						

Market: Rochester, MN-Mason City, IA-Austin, MN (#153)						
Average Total Revenue 2009-2010: \$14,750,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 151 and above	Estimated Net Profit or Loss from News Operations
KAAL	ABC	Hubbard Broadcasting	\$4,087,500	\$1,839,375	\$1,071,123	\$768,252
KIMT	CBS	New Vision Television	\$4,600,000	\$2,070,000	\$1,071,123	\$998,877
KXLT	FOX	SagamoreHill Broadcasting (SSA with Quincy)	\$1,900,000	\$855,000	\$1,071,123	-\$216,123
KTTC	NBC	Quincy (SSA with SagamoreHill)	\$4,175,000	\$1,878,750	\$1,071,123	\$807,627
Comments: All four stations provide local news. The data indicates that without the SSA between Quincy and SagamoreHill, KXLT(TV) would not be able to provide local news.						

Market: Panama City, FL (#159)						
Average Total Revenue 2009-2010: \$14,500,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 151 and above	Estimated Net Profit or Loss from News Operations
WMBB	ABC	Hoak Media	\$5,300,000	\$2,385,000	\$1,071,123	\$1,313,877
WPGX	FOX	Raycom	\$1,925,000	\$866,250	\$1,071,123	-\$204,873
WJHG	NBC	Gray Television	\$6,925,000	\$3,116,250	\$1,071,123	\$2,045,127
Comments: This market does not have a local CBS affiliate. As the economics predict, WPGX(TV) does not offer a local newscast. The other two stations provide local news programming.						

Market: Gainesville, FL (#163)						
Average Total Revenue 2009-2010: \$17,900,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 151 and above	Estimated Net Profit or Loss from News Operations
WCJB	ABC	Diversified Comm.	\$10,750,000	\$4,837,500	\$1,071,123	\$3,766,377
WGFL	CBS	CP Media (SSA with MPS)	\$2,750,000	\$1,237,500	\$1,071,123	\$166,377
WOGX	FOX	Fox Television	\$2,350,000	\$1,057,500	\$1,071,123	-\$13,623
WNBW	NBC	MPS Media (SSA with CP Media)	\$850,000	\$382,500	\$1,071,123	-\$688,623
<p>Comments: As the economics predict, WOGX(TV) does not provide local news programming. Rather, it simulcasts the news from its sister station in the Orlando DMA. The other three stations offer local newscasts. The data indicates that without the SSA between CP Media and MPS, WNBW(TV) would not be able to sustain local news programming. In fact, for many years, WCJB(TV) provided the only local news programming in the Gainesville market.</p>						

Market: Abilene-Sweetwater, TX (#164)						
Average Total Revenue 2009-2010: \$14,250,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 151 and above	Estimated Net Profit or Loss from News Operations
KTXS	ABC	Bonten Media Group	\$5,675,000	\$2,553,750	\$1,071,123	\$1,482,627
KTAB	CBS	Nexstar (SSA with Mission)	\$4,137,500	\$1,861,875	\$1,071,123	\$790,752
KXVA	FOX	Bayou City Broadcasting	\$1,675,000	\$753,750	\$1,071,123	-\$317,373
KRBC	NBC	Mission Broadcasting (SSA with Nexstar)	\$2,150,000	\$967,500	\$1,071,123	-\$103,623
<p>Comments: As the economics predict KXVA(TV) does not provide its own local newscast. Instead, it airs news programming from the San Antonio Fox affiliate. The other three stations provide local news. The data indicates that without the SSA between Mission and Nexstar, KRBC(TV) would not be able to sustain local news programming.</p>						

Market: Utica, NY (#172)						
Average Total Revenue 2009-2010: \$11,700,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 151 and above	Estimated Net Profit or Loss from News Operations
WUTR	ABC	Mission Broadcasting (SSA with Nexstar)	\$1,750,000	\$787,500	\$1,071,123	-\$283,623
WFXV	FOX	Nexstar (SSA with Mission)	\$1,837,500	\$826,875	\$1,071,123	-\$244,248
WKTV	NBC	Smith Media LLC	\$7,587,500	\$3,414,375	\$1,071,123	\$2,343,252
<p>Comments: The market does not have a local CBS affiliate. The other three stations provide local news programming. The data indicates that without the SSA between Nexstar and Mission, <u>neither WUTR(TV) nor WFXV(TV)</u> would provide local news programming. Indeed, until recently, WKTV(TV) offered the only local newscast in this market.</p>						

Market: Laredo, TX (#185)						
Average Total Revenue 2009-2010: \$13,850,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 151 and above	Estimated Net Profit or Loss from News Operations
KVTV	CBS	Brian Brady	\$1,337,500	\$601,875	\$1,071,123	-\$469,248
KXOF-CA	FOX	Entravision	\$400,000	\$180,000	\$1,071,123	-\$891,123
KGNS	NBC	SagamoreHill Broadcasting	\$4,375,000	\$1,968,750	\$1,071,123	\$897,627
<p>Comments: The Laredo market does not have a local ABC affiliate. As the economics predict, KGNS-TV is the only English-language station to provide local news.</p>						

Market: San Angelo, TX (#197)						
Average Total Revenue 2009-2010: \$6,850,000						
Station	Network	Ownership	Average Revenue 2009-2010	Average Revenue from Local News 2009-2010	Average Cost of Local News in Markets 151 and above	Estimated Net Profit or Loss from News Operations
KTXE-LP	ABC	Bonten Media Group	\$737,500	\$331,875	\$1,071,123	-\$739,248
KLST	CBS	Nexstar (SSA With Mission)	\$3,525,000	\$1,586,250	\$1,071,123	\$515,127
KIDY	FOX	Bayou City Broadcasting	\$1,225,000	\$551,250	\$1,071,123	-\$519,873
KSAN	NBC	Mission Broadcasting (SSA with Nexstar)	\$1,150,000	\$517,500	\$1,071,123	-\$553,623
<p>Comments: As the economics predict neither KTXE-LP nor KIDY(TV) provide their own local newscasts. Instead, KTXE-LP simulcasts news programming from out-of-market sister-station KTXS(TV), Sweetwater, Texas, and KIDY(TV) airs news programming from the San Antonio Fox affiliate. The other two stations provide local news, but the data indicates that without the SSA between Mission and Nexstar, KSAN(TV) would not be able to sustain local news programming.</p>						

APPENDIX B

Coalition to Preserve Local TV Broadcasting

Owner	DMA	Station
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
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
	Ft. Smith-Fayetteville	KXNW(TV), Eureka Springs, 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	WGNT(TV), Portsmouth, VA
	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

Owner	DMA	Station
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
	Ft. Wayne	WISE-TV, Fort Wayne, IN
	Peoria-Bloomington, IL	WEEK-TV, Peoria, IL
	San Francisco-Oakland	KOFY-TV, San Francisco, CA
	Syracuse	WTVH(TV), Syracuse, NY
Malara Broadcast Group, Inc.	Duluth-Superior, MN/WI	KDLH(TV), Duluth, MN
	Ft. Wayne	WPTA(TV), Fort Wayne, IN
Meredith Corporation and KVVU Broadcasting Corp.	Atlanta	WGCL-TV, Atlanta, GA
	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
Mitts Telecasting Company, LLC	Portland	KPTV(TV), Portland, OR
	Lincoln-Hastings-Kearney, NE	KSNB-TV, Superior, NE
MPS Media	Omaha	KXVO(TV), Omaha, NE
	Chattanooga	WFLI-TV, Chattanooga, TN
	Gainesville	WNBW-DT, Gainesville, FL
	Portland, ME	WPME(TV), Lewiston, ME
	Tallahassee-Thomasville, FL/GA	WTLF(TV), Tallahassee, FL
National Communications, Inc.	Wilkes Barre-Scranton	WSWB(TV), Scranton, PA
	Lake Charles, LA	KVHP(TV), Lake Charles, LA
New Age Media Broadcasting Group	Chattanooga	WDSI-TV, Chattanooga, TN
	Gainesville	WGFL(TV), High Springs, FL
	Portland, ME	WPXT(TV), Portland, ME
	Tallahassee-Thomasville, FL/GA	WTLH(TV), Tallahassee, FL
	Wilkes Barre-Scranton	WOLF-TV, Scranton, PA
	Wilkes Barre-Scranton	WQMY(TV), Williamsport, PA
Ramar Communications, Inc.	Albuquerque-Santa Fe	KRTN-TV, Durango, CO
	Albuquerque-Santa Fe	KTEL-TV, Carlsbad, NM
	Albuquerque-Santa Fe	KUPT(TV), Hobbs, NM
	Lubbock	KJTV-TV, Lubbock, TX
White Knight Broadcasting, Inc.	Baton Rouge	WVLA-TV, Baton Rouge, LA
	Shreveport	KSHV-TV, Shreveport, LA
	Tyler-Longview	KFXK-TV, Longview, TX
Woods Communications Corporation	Lubbock	KLCW-TV, Wolfforth, TX
	Montgomery-Selma	WCOV-TV, Montgomery, AL