

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

KURT A. WIMMER
TEL 202.662.5278
FAX 202.778.5278
KWIMMER@COV.COM

October 16, 2012

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

Re: *2010 Quadrennial Regulatory Review*, MB Docket 09-182

Dear Ms. Dortch:

On October 16, 2012, Caroline H. Little, Chief Executive Officer of the Newspaper Association of America, Paul J. Boyle, Senior Vice President/Public Policy of the Newspaper Association of America, accompanied by the undersigned, met with Commission Mignon Clyburn, Dave Grimaldi, Chief of Staff and Media Legal Advisor to Commissioner Clyburn, and Louis Peraertz, Wireless, Public Safety and International Legal Advisor to Commissioner Clyburn, to discuss current issues of concern to the newspaper industry.

During the discussion, the NAA participants were asked about their positions on issues relating to the above-captioned docket. In response, the NAA participants discussed the positions taken by NAA in comments filed by the NAA on March 5, 2012, including the need for greater flexibility for investments in newspaper companies by companies that also own television licensees, the need for ownership relief in small as well as large markets, and NAA's agreement with the Commission's proposal to eliminate the cross-ownership restriction relating to ownership of newspapers and radio licensees.

The NAA participants also pointed out that media cross-ownership (that is, common ownership of different media) does not present many of the same concerns that often are expressed around multiple ownership (that is, national or local ownership of multiple outlets of the same medium). Because of the essential differences between broadcasting and newspaper publishing, common ownership can produce unique benefits for local populations, including more original local reporting. In addition, investment in newspaper companies can create opportunities for diverse online voices to participate in the local media ecosystem.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,



Kurt Wimmer

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cc: The Hon. Mignon Clyburn
Dave Grimaldi, Esq.
Louis Peraertz, Esq.