

December 20, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Entercom Communications Corp. Petition for Rulemaking; RM-11684

Dear Ms. Dortch:

On behalf of Local TV, LLC (“Local TV”), I have attached a revised version of a letter submitted today in the above-captioned proceeding. The version of the attached initially submitted through ECFS inadvertently failed to include a certificate of service. Please contact me if you should have any questions regarding this matter.

Respectfully submitted,



Derek Teslik
Counsel to Local TV, LLC

December 20, 2012

Marlene H. Dortch, Esq.
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Entercom Communications Corp. Petition for Rulemaking
RM-11684

Dear Ms. Dortch:

On November 20, 2012, the FCC requested comment on a Petition for Rulemaking (the "Petition") filed by Entercom Communications Corp. ("Entercom") on January 20, 2012. Entercom's Petition requests the initiation of a proceeding to amend Section 73.1216 of the Commission's Rules, 47 C.F.R. § 73.1216 (the "Contest Rules"), which governs contests conducted by broadcast stations. Local TV, LLC ("Local TV") fully supports Entercom's request that the Commission initiate a proceeding to consider changes to the Contest Rules.

As Entercom notes, the Contest Rules were created in, and for, a media environment that no longer exists. In 1976, when the Contest Rules were crafted, the Internet as we know it did not exist. Today, as the Commission recognized in its recent order moving television stations' public inspection files online, "[t]he Internet is an effective and low-cost method of maintaining contact with, and distributing information to, broadcast viewers."¹ For the same reasons advanced by the FCC in its online file proceeding, allowing broadcasters to post contest rules online in lieu of requiring rules to be read or viewed during broadcasts, would afford the public ample opportunity to access those rules while reducing the burden on broadcasters – and on viewers and listeners – imposed by the current Contest Rules.

Indeed, as a coalition of state broadcasters associations has noted, revisions to the Contest Rules along the lines of those proposed by Entercom would ensure the broadcast audience would have immediate, round-the-clock access to the terms and conditions relating to broadcast contests.² Potential contest participants would be able to read, re-read, and consider the rules at their own pace.

¹ Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, *Second Report and Order*, 27 FCC Rcd 4535, 4542, ¶ 13 (2012).

² Named State Broadcasters Associations, Joint Comments in Support of Petition for Rulemaking, RM-11684, at 4-5 (filed Dec. 13, 2012).

Marlene H. Dortch, Esq.

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In Local TV's experience, the current Contest Rules impose real burdens on broadcasters and audiences. After including all required contest terms in a thirty-second contest announcement, stations barely have time to include a simple explanation of how viewers can participate in the contest. Moreover, we estimate that the current rules add approximately two hours to the production time involved in creating each contest-related spot. These burdens act as a disincentive to station contests without providing any countervailing benefit: as discussed above, allowing potential contest participants to review full contest rules at their own pace and on their own schedule would better serve their interests. Indeed, as most of our contests are conducted through station web sites, online disclosure of terms would be more effective than relying on over-the-air announcements.

For these reasons, Local TV urges the Commission to initiate a rulemaking proceeding for the purpose of amending Section 73.1216 of the Commission's Rules.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Pamela Taylor". The signature is fluid and cursive, with a large initial "P" and a long, sweeping tail.

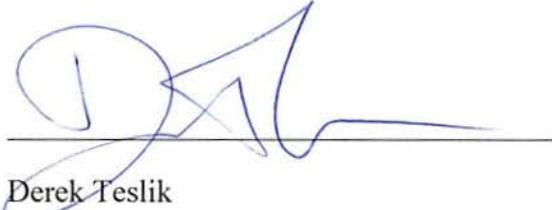
Pamela Taylor
Chief Operating Officer
Local TV, LLC

Certificate of Service

The undersigned hereby certifies that a copy of the foregoing document was deposited in the United States Mail, first-class postage prepaid, and addressed as follows:

John C. Donlevie
Carrie Ward
Entercom Communications Corp.
401 City Avenue, Suite 809
Bala Cynwyd, PA 19004

This, the 20th day of December, 2012.



Derek Teslik