

January 8, 2013

VIA ECFS

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notification of *Ex Parte* Communication
MB Docket No. 09-182

Dear Ms. Dortch:

This is to advise you, in accordance with Section 1.1206 of the FCC's rules, that on January 4, 2013, George L. Mahoney, President and Chief Executive Officer of Media General, Inc. ("Media General"); Andrew C. Carington, Vice President, General Counsel and Secretary of Media General; and I met with Commissioner Ajit Pai and Matthew Berry, Chief of Staff to Commissioner Pai, to discuss the Commission's proposal to modify the attribution status of television joint sales agreements (JSAs).

The Media General representatives explained that the company's experience in Augusta, Georgia where it participates in a JSA and shared services agreement (SSA) demonstrates the benefits to the public of such arrangements. In Augusta, which is DMA #114, Media General, through a subsidiary, holds the license for WJBF(TV). Under the JSA, it sells advertising time and provides up to fifteen percent of the weekly programming on WAGT(TV), which is licensed to a subsidiary of Schurz Communications, Inc. Since the JSA and SSA went into effect at the beginning of 2010, the following increases in programming have occurred:

- a. Media General has added 4.5 hours of local news and 30 minutes of locally originated programming to WAGT(TV)'s schedule on a weekly basis. The additional programming is as follows:
 - Monday to Friday, 7-7:30 pm, newscast
 - Saturday and Sunday, 9-10 am, newscast
 - Saturday, 6-6:30 pm, local cooking show

- b. Media General has added 3.5 hours a week of local news to WAGT-D2's schedule with the launch of a new daily newscast that airs from 10-10:30 pm., Sunday through Saturday.

- c. Media General has added two hours of local news and 30 minutes of locally originated programming to WJBF(TV)'s schedule on a weekly basis. Those additions are as follows:
 - Saturday and Sunday, 7-8 am, newscast
 - Friday, 12:30-1 pm, local cooking show

- d. Media General has added three hours a week of local sports on WJBF(TV)'s digital subchannel with its broadcast on Thursday nights during the fall of local high school football games from 7:30 to 10:30 pm.

In total, residents in Augusta now receive an additional 10 hours a week of local news programming and, in the fall during high school football season, an additional four hours a week of locally originated non-news programming; the remainder of the year, the news total remains at 10 additional hours, but the amount of locally originated non-news programming decreases to one hour. These additions have been possible due to the economic efficiencies achieved through the JSA and SSA.

Media General's representatives also pointed out that television stations face competition in advertising sales from cable and satellite systems which are free to sell together, and reported that, in most markets, advertising on all multi-channel video programming distribution systems is sold in combination. In addition, Media General noted that the Media Bureau had routinely approved JSAs for almost a decade, and millions of dollars of investment in new and improved facilities have been undertaken in reliance on such approvals. The Commission, Media General contended, should hesitate before taking action that would discourage future investment in broadcasting.

Based on such positive benefits in Augusta and other markets, Media General's representatives asserted that the Commission should not make JSAs attributable. If, however, the Commission does not want to abandon its attribution proposal, Media General urged that the FCC should first open another proceeding to ensure a complete record on the issue prior to adopting any changes. Such a proceeding is necessary to document the public interest rationales behind any change. If after such review, the FCC eventually decides to make JSAs attributable, Media General said that it should not do so without, at the same time, modifying its local television duopoly rule which, in small and medium television markets, has not effectively changed for decades.

If the Commission decides not to open a separate proceeding and proceeds to make JSAs attributable without loosening the duopoly restrictions in small and medium-sized markets, Media General urged the FCC to adopt an exemption or waiver of attribution for JSA brokers that provide significant local news and locally originated programming on brokered stations. Media General suggested the required level of local news and locally originated programming necessary for such an exemption should be set at the current amount of programming brokers are allowed to provide without triggering attribution -- up to fifteen percent of the brokered station's programming on a weekly basis. Such an exemption would encourage programming

Marlene H. Dortch, Esquire

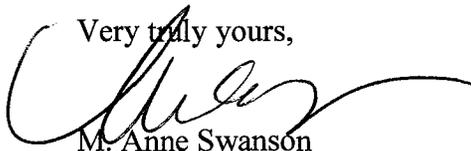
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improvements, such as local news, that otherwise would very likely be absent because of the frequently poor pre-JSA financial condition of brokered stations. In Augusta, Media General had been told that, absent the JSA, Schurz would have had to eliminate local news programming.

As required by Section 1.1206(b), as modified by the policies applicable to electronic filings, one electronic copy of this letter is being submitted for the above-referenced docket.

Very truly yours,

A handwritten signature in black ink, appearing to read 'M. Anne Swanson', with a long, sweeping flourish extending to the right.

M. Anne Swanson

cc (via email):

The Honorable Ajit Pai

Matthew Berry, Esquire