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January 16, 2013

VIA ECFS

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

Re: Notice of *Ex Parte* Communication in 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 14, 2013, Jay Howell, Vice President – Regional Television of LIN Television Corporation d/b/a LIN Media ("LIN"), along with Joshua Pila, Senior Counsel of LIN, and I met with Matthew Berry, Chief of Staff to Commissioner Pai, and Ben Tarbell, Intern, Office of Commissioner Pai, to discuss the Commission's proposal to modify the attribution status of broadcast television joint sales agreements ("JSAs"). We also provided copies of the attached documents.

LIN's representatives explained that broadcast JSAs serve in part as a market response to multichannel video programming distributor ("MVPD") interconnection agreements. In most television markets many or most of the largest MVPDs cooperate to sell advertising jointly via these "interconnects". The interconnects allow one MVPD to sell advertising across entire DMAs on behalf of multiple MVPDs, including not just cable operators, but also in some cases satellite television and "telco" video providers. We explained that the MVPD interconnects dwarf broadcast JSAs in size and scale and that they have access to sophisticated and very expensive sales research and tools that give them enormous advantages over stand-alone broadcast stations in the sale of local advertising. The reach and scale of these interconnects has allowed the MVPDs, working together, to compete directly with broadcasters for local television advertising buys that historically would have been allocated exclusively to broadcast stations.

Mr. Howell explained that the success of cable interconnects in aggregating advertising inventory across many channels and entire markets has made operation as a standalone television broadcaster challenging in many markets. Media buyers that traditionally would have run advertising on three, four or five local broadcast stations on an advertising flight may now only buy one or two stations deep, plus the interconnect. Mr. Howell noted that the ABC affiliate in Providence, Rhode Island – a "big four" affiliate in the 53rd largest television market - went bankrupt.

Mr. Pila noted that the revenue lost to MVPD interconnects often has a deleterious effect on localism. MVPDs originate almost no local content, and often invest money gained from interconnect efficiencies in sports rights, which further drives up subscriber fees and deprives consumers of free, over-the-air local sports. Mr. Howell provided examples of local sports rights competition from MVPDs with interconnects. In contrast, LIN noted that in markets where LIN is a party to JSAs, LIN has invested extensive resources, much of it resulting from the efficiencies of JSAs, in local operations.

Mr. Pila stated that in a sales environment dominated by MVPD interconnects, JSAs have made it possible for third, fourth and fifth ranked stations to survive as viable voices and competitors in many markets. Mr. Pila explained that in 2004, when the FCC last sought comment on attribution of television JSAs, competition for local advertising sales was substantially different and any conclusions about the impact of new regulations attributing broadcast JSAs on the market today requires an updated record. In 2004, almost a decade ago, MVPD interconnects were smaller, total penetration and reach were far lower, and the interconnect operations were not nearly as sophisticated as they are today. In response to a question from Mr. Berry, Mr. Pila stated that the practical impact of attribution of local broadcast television JSAs would be loss of jobs, loss of market share for third, fourth and fifth ranked stations, and a substantial net loss of locally oriented programming. Mr. Pila said the impact would be worse in smaller markets than in larger markers. Mr. Pila encouraged the Commission to address any JSA concerns with a scalpel, not an axe, to preserve public service from lower-ranked stations, especially in small markets.

LIN representatives stated that in the last three months LIN has begun providing sales services to small market stations under joint sales agreements that were approved by the Commission. LIN has already spent tens of thousands of dollars enhancing sales tools, purchasing research, and providing training. Mr. Pila noted that these efforts were only the beginning of LIN's investments in the joint sales arrangements in those markets given the short time period they have been in effect. Mr. Pila also explained the shared services agreements that were also approved by the Commission. In response to a question by Mr. Berry, LIN's representatives explained that the principal of Vaughan Media, LLC, which controls the stations with which LIN has JSAs, is responsible for all programming decisions and directly enters into programing contracts for those stations.

In conclusion, we restated LIN's belief that JSAs should not be attributed and LIN's position that the Commission would be required to update the record before considering attribution of JSAs.

Very truly yours,

/s/

John K. Hane

Enclosure

cc (via e-mail): Matthew Berry
Ben Tarbell
Joshua Pila
Jay Howell

http://www.comcastspotlight.com/markets/savannah/zone/

Savannah Interconnect Loc...

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Comcast SPOTLIGHT.

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GO

HOME | HOW TO ADVERTISE | FIND YOUR MARKETS | ADVERTISING SOLUTIONS | NETWORKS | ABOUT US | NEWS

Reach viewers in Savannah DMA

The Savannah interconnect includes the zones of Savannah, Hinesville, Beaufort, Bluffton and Island of Beaufort

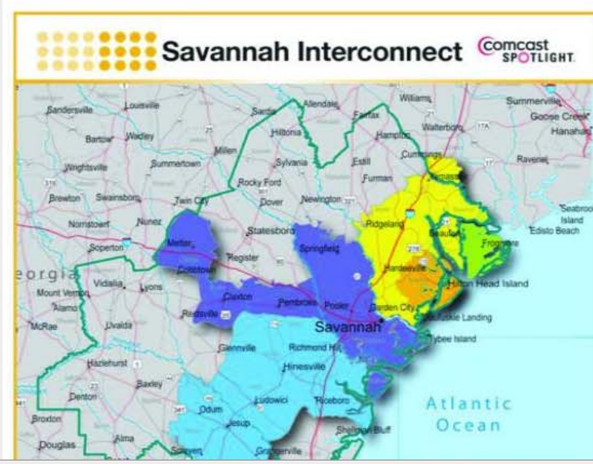
- Market Home
- Coverage Overview
  - Bluffton-Beaufort
  - Hilton Head
  - Hinesville
  - Islands of Beaufort
  - Savannah
  - Savannah Interconnect
- Market Info
- Programming
- Available Ad Solutions
- Resources
- Production
- Contact Us
- Promotions

Home | Find Your Markets | Savannah | Coverage Overview | Savannah Interconnect

Savannah Interconnect

The Savannah Interconnect is one large zone that includes all of our individual zones. This is a joint partnership between Charter, Time Warner and Hargray where Comcast Spotlight manages the commercial inventory. When one commercial airs on the interconnect, it is seen at the same time in all of the zones.

Coverage Map



100%

Spot Cable Advertising

Fast Facts

Simple – Spot cable is simple to plan and simple to buy.

Market Focused – Spot Cable allows you to master the changing television marketplace.

Adaptable – Select the right networks, dayparts and programs for your brand in every market.

ROI Driven – Deliver consumer reach and effective frequency – eliminate doubt and waste.

Targeted – Spot Cable offers a wide range of advanced engagement and technologies.

Overview

Spot cable refers to cable purchases in local markets or other geographic areas as specified by you and/or your ad agency. With spot cable advertising, marketers can pick and choose from various cable networks and from different geographic areas covered by the cable system.

Benefits

- Allows you to strengthen your brand in the markets most important to you.
- Provides efficient media buying – spot cable allows you to reach your core audience without paying for wasted coverage.
- Allows you to reach potential customers that share similar interests.
- Provides you with the opportunity to marry your message with top-rated network and programming brands for increased awareness and credibility.

Features

- Geographic Targeting – By effectively using spot cable, you can reduce waste by concentrating your message only in the areas you need to reach potential customers.
- Demographic Targeting – Cable networks have specific audiences with their own individual interests. Spot cable allows you to advertise on the cable networks that best allow you to reach the niche audiences interested in your products or services.
- Flexibility – Because of the way cable systems are now “interconnected,” you can easily create a strategic, awareness-building campaign, while still enjoying the efficiency and targetability that spot cable delivers.

Comcast SPOTLIGHT

Research

Fast Facts

- A $20 million research investment is made annually to help you reach your best prospects geographically, demographically or psychographically.
- Sophisticated marketing intelligence drilled down from various sources for every advertising category.
- We have a strong commitment to defining your best prospects and identifying the most effective methods to reach them.

Overview

Comcast Spotlight provides you with the expert knowledge to confidently invest in our expanding array of advertising products from linear channels (e.g. ESPN, CNN and TNT) to our non-linear digital cable products (e.g. On Demand, XFINITY.com) In addition to the syndicated research services we use (e.g. Nielsen, Scarborough, TNS), we also conduct primary research to ensure you are maximizing your advertising campaigns. Every step of the way, we help you target and execute your advertising plan effectively within our media channels.

Benefits

Comcast Spotlight is structured to provide you with both strategic and tactical insights into your media and marketing planning process. For example, through our Polk database, we can compare and contrast local market competitive trends versus overall national patterns. And, with our geographic information and mapping system from SRC, we can examine category sales down to the zip code level and generate thematic maps to illustrate high (and low) areas of opportunity for advertisers. Comcast Spotlight's research expertise is geared to transform data into critical and actionable insights.

Features

Comcast Spotlight relies on sophisticated quantitative and qualitative applications to provide you with customized research. The quantitative data from Nielsen, Strata, Polk and others gives you precise analysis of television viewership, advertising schedules and the competitive environment. MRI, Scarborough and various other resources provide extensive qualitative data on consumers, geographies and media usage to help you make a more informed decision.

Find Your Markets

Do You Know the Marketplace?

Find Your Markets

Comcast Spotlight reaches roughly **33+ million** homes and has more interconnects than any single broadcast group has owned and operated stations. We have presence in 7 of the top 10 DMAs and 13 of the top 20 DMAs.

The interactive map below can be a quick and invaluable tool to learn where to advertise.

Simply select the geographic areas that matter most and we'll give quick snapshots of each market's demographics.

The snapshots also presents the names of the local market representatives to learn the many unique ways Comcast Spotlight can help build an advertiser's brand.