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January 16, 2013

VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 Dave Grimaldi, Chief of Staff and Media Legal Advisor to Commissioner Clyburn, 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.

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LIN explained that all of LIN's JSAs had been approved by the Commission and, despite being in place only a short time, have already shown strides in strengthening public service to local communities where the stations are located. LIN's representatives described the Dayton market successes listed on the attached documents. They explained how LIN was able to invest efficiencies gained from JSAs into a stronger web presence and to launch the CW Star contest, which provides non-traditional avenues to on-air employment. Mr. Pila and Mr. Howell explained that the annual CW Star contest is a reality show-type contest to select a person who will receive a one-year contract as the on-air spokesperson for WBDT. The CW Star contest allows for those who did not attend journalism school or are otherwise not "on track" for on-air employment to build a resume and have the opportunity for on-air employment. The annual CW Star winner receives substantial training and gets a substantial amount of exposure on air and in the market for the one year duration.

Mr. Pila noted that in another LIN market, several of the CW Stars in the past few years have been African-American individuals without prior television experience. Mr. Howell described how the CW Star process requires a great deal of resources, including promotional support, production, and training, that a marginal station would not be able to afford. LIN's representatives also noted that WBDT was able to leverage its relationship with LIN to obtain African-American-focused programming from the Bounce network. LIN believes that a standalone station would not have been able to bring such programming to the Dayton market without a relationship with a larger entity that provides stability and resources to a struggling station through joint sales efficiencies.

Very truly yours,

/s/

John K. Hane

Enclosure

cc (via e-mail):        Dave Grimaldi  
                              Joshua Pila  
                              Jay Howell

## Reach viewers in Savannah DMA

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

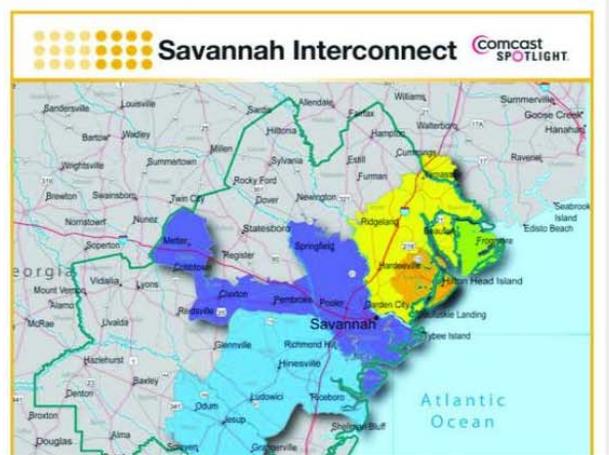


- Market Home
- Coverage Overview
  - Bluffton-Beaufort
  - Hilton Head
  - Hinesville
  - Islands of Beaufort
  - Savannah
  - Savannah Interconnect**
- Market Info
- Programming
- Available Ad Solutions
- Resources
- Production
- Contact Us
- Promotions

### 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





# Spot Cable Advertising

## Fast Facts

**S**imple – Spot cable is simple to plan and simple to buy.

**M**arket Focused – Spot Cable allows you to master the changing television marketplace.

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

**R**OI Driven – Deliver consumer reach and effective frequency – eliminate doubt and waste.

**T**argeted – 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.





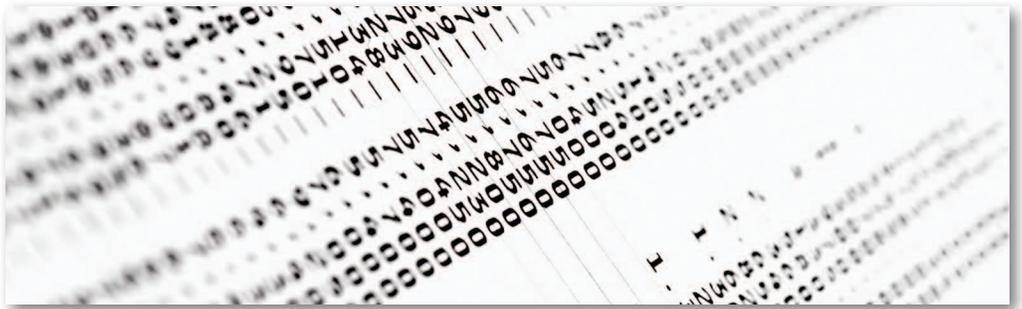
# Research

## 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.



