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January 23, 2013

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 January 22, 2013, James M. Moroney III, Chairman of the Board of the Newspaper Association of America (NAA) and Publisher and CEO of the Dallas Morning News; Steven J. Smith, chair of the Public Policy Committee of the NAA and Chairman, CEO and President of Journal Communications; Caroline H. Little, Chief Executive Officer of the NAA; and Paul J. Boyle, Senior Vice President/Public Policy of the NAA; accompanied by the undersigned, met with Commissioner Mignon Clyburn, Dave Grimaldi, Chief of Staff and Media Legal Advisor to Commissioner Clyburn, and Brian Indovina, Legal Advisor to Commissioner Clyburn, to discuss current issues of concern to the newspaper industry.

The NAA participants discussed the positions taken by NAA in comments filed by the NAA on March 5, 2012, as well as NAA's supplemental comments filed on December 23, 2012, which demonstrated that the limited liberalization of the cross-ownership rule proposed in this docket would not have an impact on minority ownership. Mr. Moroney pointed out that greater flexibility for investments in newspaper companies by companies that also have television interests would help to preserve the high-quality local journalism provided by newspapers. Mr. Smith pointed out that cross-ownership does not provide an owner with an insurmountable competitive advantage in a market, contrary to positions taken by some commenters, based on his experience with a grandfathered combination that competes vigorously with a successful minority-owned radio group in his community. The NAA participants also pointed out 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.

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.  
Brian Indovina, Esq.