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January 24, 2013

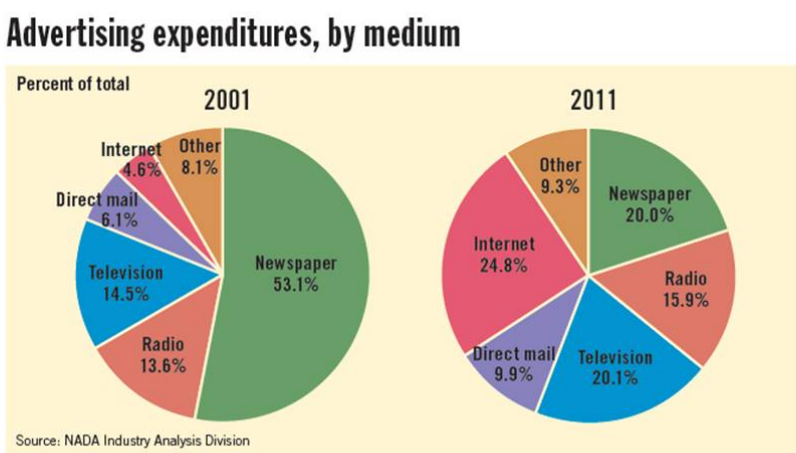
Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *2010 Quadrennial Regulatory Review,* MB Docket 09-182

Dear Ms. Dortch:

Further to the ex parte notification we filed yesterday, which described a meeting among representatives of the Newspaper Association of America (NAA) and Commissioner Mignon Clyburn, Dave Grimaldi, Chief of Staff and Media Legal Advisor to Commissioner Clyburn, and Brian Indovina, Legal Advisor to Commissioner Clyburn, we thought the attached summary of research would be useful.

We understand that some commenters have stated that it would be impossible for a radio-only company to compete for automobile advertising with a commonly owned newspaper and radio station because of the market power held by newspapers in the area of automobile advertising. As the NAA participants discussed, this is not a real-world view. Current national research by the National Association of Auto Dealers demonstrates that newspapers no longer hold any dominant position in obtaining automobile advertising:



As the NADA research indicates, the newspaper industry quite clearly does not have dominance in automotive advertising. In the ten years studied, television automotive advertising has grown by 33 percent, and Internet automotive advertising has grown 500 percent -- and in the same period, newspaper automotive advertising has fallen from 53 percent to only 20 percent. Adding radio to the mix could not conceivably create a competitive force that would overwhelm the ability of any radio group to compete.

The NADA research is consistent with the Commission's own research summarized in the Report on Information Needs of Communities:

> In 2000, revenue from ads for employment, real estate, vehicles, and the sale of smaller items and services accounted for 40 percent of newspaper's print advertising revenue, but by 2010 it had fallen 71 percent, from $19.6 billion to $5.6 billion, amounting to just 25 percent of total print ad revenue. As the Internet grew, some of that money went to Google, where small businesses could advertise easily and efficiently. Some went to specialty sites for jobs (including Monster.com and CareerBuilder.com), cars (AutoTrader.com and Cars.com), and real estate (Realtor.com, Yahoo Real Estate, and Zillow.com), and some went to Craigslist,

Report on the Information Needs of Communities, 39-40 (footnotes omitted).

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

Kurt Wimmer

cc: The Hon. Mignon Clyburn
Dave Grimaldi, Esq.
Brian Indovina, Esq.