

COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

BEIJING
BRUSSELS
LONDON
NEW YORK
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
WASHINGTON

KURT A. WIMMER
TEL 202.662.5278
FAX 202.778.5278
KWIMMER@COV.COM

January 29, 2013

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

Re: *2010 Quadrennial Regulatory Review, MB Docket Nos. 07-294
and 09-182*

Dear Ms. Dortch:

During the Newspaper Association of America's recent visits to the Commission to discuss cross-ownership reform, some members of the Commission leadership and Media Bureau staff expressed concern about the quality of journalism at cross-owned newspapers. The NAA writes to briefly highlight the outstanding journalism at newspapers that are cross-owned with television stations. As the NAA has established in earlier comments, cross-ownership bolsters local newsgathering by allowing newsrooms to pool resources and share breaking news tips.

Cross-owned newspapers produce exceptionally high-quality journalism. Of the more than 1,300 daily newspapers in the United States, only about 25 are cross-owned with television stations due to grandfathering or waivers from the cross-ownership ban. These newspapers have received an extraordinary total of 30 Pulitzer Prizes during the time that they have been cross-owned. Many of these Pulitzer Prizes went to small and mid-sized cross-owned papers. Below are examples of cross-owned newspapers that recently won Pulitzer Prizes:

- The 33,000-circulation *Bristol (VA) Herald Courier*, which was cross-owned with WJHL-TV, exposed mismanagement of natural gas royalties that were owed to thousands of landowners in Virginia. The series prompted the Virginia legislature to reform the royalty system.
- The *Milwaukee Journal-Sentinel*, which is cross-owned with WTMJ-TV, won the 2010 Pulitzer Prize for local reporting for a year-long investigation of abuses in the state's \$350 million child care system. The series led to criminal investigations, indictments, and new state laws that reformed the system.

Ms. Marlene H. Dortch, Secretary

January 29, 2013

Page 2

- The next year, the *Journal-Sentinel* won the Pulitzer for explanatory reporting for an in-depth series about an effort to use genetic technology to save a young boy.
- The *Dallas Morning News*, which had long been cross-owned with WFAA-TV under a grandfathered arrangement, won a 2010 Pulitzer for a series of editorials that exposed the economic disparity between the north and south sides of Dallas.
- The *Atlanta Journal-Constitution*, which is cross-owned with WSB-TV, won the 2007 Pulitzer for commentary for Cynthia Tucker's "courageous, clear-headed columns that evince a strong sense of morality and persuasive knowledge of the community."

Cross-owned newspapers clearly are committed to producing outstanding journalism and serving their communities by shining a light on corruption and explaining complicated subjects to the general public. Sharing breaking news tips and investigative efforts with television newsrooms allows the newspapers to dedicate their resources to robust coverage of their local communities.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,



Kurt Wimmer
Jeff Kosseff