



CONNECTING HOMETOWN AMERICA

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June 3, 2013

VIA ECFS

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

Re: Ex Parte Communication of the American Cable Association; 2010 Quadrennial Regulatory Review -- Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 09-182; Amendment of the Commission's Rules Related to Retransmission Consent, MB Docket No. 10-71.

Dear Ms. Dortch:

The American Cable Association (“ACA”) has previously brought to the Commission’s attention the widespread and increasing consolidation in the local television station marketplace, particularly the rising prevalence of separately owned, same market Big 4 network affiliates (e.g., ABC, CBS, FOX, NBC) coordinating their activities in ways that are harmful to competition and consumers. ACA submits this letter in the above referenced dockets now in light of the significant number of recent broadcast television mergers and acquisitions and sharing agreements, which present fresh evidence highlighting how broadcasters effectively ignore the Commission’s prohibition on duopoly ownership between top four-rated stations in the same market (usually Big 4 network affiliates), particularly through creative structuring of license transfers, followed by subsequent arrangements to coordinate activities. Taking into account deals that have closed in 2013, and those currently pending, within months there will likely be at least five new instances of top four-rated stations in a single market operating under a sharing arrangement, and the year is only half over. In light of the significant increase in local television consolidation, it is now more vital than ever that the Commission take action in its pending media ownership review to clarify the legal bounds of permissible sharing arrangements under its broadcast ownership and affiliation rules, and in particular, prohibit separately owned, same market broadcasters from coordinating their retransmission consent negotiations.

As part of the media ownership review, the Commission has sought comment on the practice of separately owned, same market broadcasters coordinating their activities.¹ ACA brings to the

¹ 2010 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996; Promoting Diversification of Ownership In the Broadcasting Services, MB Docket Nos. 09-182, 07-294, Notice of Proposed Rulemaking, 26 FCC Red 17489 ¶¶ 204-208 (2011).

Commission's attention the following deals that highlight the increasing prevalence of separately owned, same market top four-rated stations operating as virtual duopolies in view of the Commission's statutory obligation to take account changes in the marketplace as part of its quadrennial media ownership review. We urge the Commission to take this information into account and properly evaluate the utility of continuing to permit these deals under its rules.

On April 24, the Nexstar Broadcasting Group ("Nexstar") and Mission Broadcasting ("Mission") announced their acquisition of Communications Corporation of America ("CCA") and White Knight Broadcasting ("WK"), and their intent to enter into sharing agreements with same market stations.² The transaction is structured at least in part to create two new virtual duopolies between top four-rated stations affiliated with Big 4 networks without running afoul of the Commission's local television ownership rule.³ The two new virtual duopolies are:

- **Shreveport, LA: KMSS (FOX) and KTAL (NBC)**. Nexstar currently owns KTAL (an NBC affiliate), and this transaction will result in Mission acquiring KMSS (a FOX affiliate) in the Shreveport, LA designated market area ("DMA") from CCA. Upon the closing of these deals, Nexstar will enter into various coordination arrangements with Mission to provide services to KMSS.⁴
- **Midland-Odessa, TX: KPEJ (FOX) and KMID (ABC)**. Nexstar currently owns KMID (an ABC affiliate), and this transaction will result in Mission acquiring KPEJ (a FOX affiliate) in the Midland-Odessa, TX DMA from CCA. Upon completion of the deal, Nexstar will enter into various coordination agreements with Mission to provide services to KPEJ.⁵

On February 28, Sinclair Broadcast Group ("Sinclair") announced that it and other companies with which it has close relations had entered into an agreement to purchase the broadcast assets of Barrington Broadcasting Group, LLC, ("Barrington") and to enter into sharing arrangements with same market stations.⁶ As with the Nexstar deal, the Sinclair/Barrington deal has been structured to avoid technically violating the Commission's local television ownership rule.⁷ This deal contemplates the creation of a new virtual duopoly between top four-rated stations affiliated with Big 4 networks:

- **Flint-Saginaw-Bay City, MI: WEYI (NBC) and WSMH (FOX)**. Sinclair currently owns WSMH (a FOX affiliate), and this transaction will result in Howard Stirk Holdings, a newly formed, separately controlled entity created for the purpose of this transaction, acquiring

² Nexstar Broadcasting Group, Inc., *Nexstar Broadcasting Group and Mission Broadcasting to Acquire Communications Corporation of America and White Knight Broadcasting, Owners of 19 Television Stations in Ten Markets, for \$270 Million in Accretive Transaction*, Apr. 24, 2013, http://www.nexstar.tv/index.php?option=com_content&view=article&id=14722:nexstar-broadcasting-group-and-mission-broadcasting-to-acquire-communications-corporation-of-america-and-white-knight-broadcasting-owners-of-19-television-stations-in-ten-markets-for-270-million-in-accretive-transaction&catid=40:cat-newsarticles&Itemid=97 ("Nexstar Press Release"); FCC Form 314, File No. BALCDT-20130503ACK, Ex. 5 (Description of Transaction), at 2-5 (filed May 6, 2013) ("Nexstar-CCA Transaction Description").

³ Nexstar-CCA Transaction Description at 2.

⁴ http://www.nexstar.tv/index.php?option=com_content&view=article&id=301&Itemid=2 (last visited on May 31, 2013) ("Nexstar Station List"); Nexstar-CCA Transaction Description at 3-4, 4 n.7.

⁵ Nexstar Station List; Nexstar-CCA Transaction Description at 3-4, 4 n.7.

⁶ Sinclair Broadcast Group, Inc., *Sinclair Broadcast Group Announces Agreement To Purchase Barrington TV Stations; Steven Pruett To Be Named Chief Operating Officer of Chesapeake TV Subsidiary* (Feb. 28, 2013).

⁷ See FCC Form 314, File No. BALCDT-20130315ACS, Ex. 5, at 2 n.3 (filed Mar. 18, 2013) ("Sinclair Transaction Description").

WEYI (an NBC affiliate) in the Flint-Saginaw-Bay City, MI DMA from Barrington. Upon the closing of the deals, Sinclair will enter into various coordination agreements to provide services to WEYI.⁸

Several other recent deals that closed since January 1, 2013 also create new virtual duopolies involving top four stations that are Big 4 network affiliates:

- **Burlington, VT-Plattsburgh, NY: WFFF (FOX) and WVNY (ABC).** On March 1, 2013, Nexstar and Mission closed on transactions whereby Nexstar acquired WFFF (a FOX affiliate) from Smith Media, and Mission acquired WVNY (an ABC affiliate) from Lambert Broadcasting. Both stations cover the Burlington, VT-Plattsburgh, NY DMA. As part of these deals, Nexstar and Mission entered into a coordination agreement whereby Nexstar provides services to WVNY.⁹
- **Little Rock-Pine Bluff, AR: KARK (NBC) and KLRT-TV (FOX).** On January 1, 2013, Mission closed on its transaction to acquire KLRT-TV (a FOX affiliate) serving the Little Rock-Pine Bluff, AR DMA from Newport Television LLC. Nexstar already owned KARK (an NBC affiliate) in this market. As part of the deal, Nexstar entered into coordination agreements with Mission to provide services to KLRT-TV.¹⁰

In addition to the deals above creating virtual duopolies, the following approved and pending transactions raise related concerns.

- **Fresno, CA: KSEE (NBC) and KGPE (CBS).** On April 17, 2013, the Media Bureau approved Nexstar's assignment application to acquire KSEE (an NBC affiliate) in Fresno, CA, from Granite Broadcasting Corporation.¹¹ Upon the closing of the deal, Nexstar, which

⁸ Sinclair Transaction Description at 2 n.3. Sinclair will provide support through a joint sales agreement and SSA to WEYI. The WEYI licensee, Howard Stirk Holdings, is a company controlled by Armstrong Williams, who reportedly has extensive ties to Sinclair. See Doug Halonen, *Armstrong Looks to Build on WEYI-WWMB*, TVNewsCheck, Mar. 6, 2013 (Sinclair has been distributing Williams' programming for more 10 years and guaranteed Williams' loan for HSH).

⁹ Nexstar Broadcasting Group, Inc., *Nexstar Broadcasting and Mission Broadcasting Complete Acquisition of Two Vermont Stations for \$16.9 Million* (Mar. 4, 2013), http://www.nexstar.tv/index.php?option=com_content&view=article&id=13702:nexstar-broadcasting-and-mission-broadcasting-complete-acquisition-of-two-vermont-stations-for-169-million&catid=40:cat-newsarticles&Itemid=97. See also WVNY Consummation Notice (filed Mar. 1, 2013); WFFF-TV Consummation Notice (filed Mar. 1, 2013); BALCDT - 20121109ADF (filed Jan. 3, 2013) (Nexstar and Mission entered into an SSA and other agreements regarding WFFF and WVNY).

¹⁰ Nexstar Broadcasting Group, Inc., *Nexstar Broadcasting Announces Completion of Acquisition of Two Television Stations by Mission Broadcasting from Newport Television for \$60 Million in Cash* (Jan. 3, 2013), http://www.nexstar.tv/index.php?option=com_content&view=article&id=12542:nexstar-broadcasting-announces-completion-of-acquisition-of-two-television-stations-by-mission-broadcasting-from-newport-television-for-60-million-in-cash&catid=40:cat-newsarticles&Itemid=97. See also KLRT-TV Consummation Notice (filed Jan. 4, 2013); BALCDT - 20120725AGJ (filed July 25, 2012); BALCDT - 20120725AGJ, Attach. 13 (filed July 25, 2012) (Nexstar and Mission entered into an SSA and other agreements regarding KARK and KLRT). See also Kevin Eck, *Layoffs Hit Little Rock's KLRT and KARK*, TVSpy, Jan. 30, 2013.

¹¹ Nexstar Broadcasting Group, Inc., *Nexstar Broadcasting Enters Into a Definitive Agreement to Acquire Fresno, California NBC Affiliate KSEE(Tv) For \$26.5 Million in Accretive Transaction*, Feb. 6, 2013, http://nexstar.tv/index.php?option=com_content&view=article&id=13062:nexstar-broadcasting-enters-into-a-definitive-agreement-to-acquire-fresno-california-nbc-affiliate-kseetv-for-265-million-in-accretive-transaction&catid=40:cat-newsarticles&Itemid=97; BALCDT - 20130213ABR (granted Apr. 17, 2013).

acquired KGPE (a CBS affiliate) from Newport Television, LLC (“Newport”) on February 1, 2013, will have an ownership interest in two Big 4 network stations in the market.¹² This is not a duopoly prohibited by the Commission’s rules because one of the stations is currently the fifth highest-rated station in the market, but this transaction nevertheless results in a single company controlling two Big 4 network stations in a single market.¹³

- **Syracuse, NY: WSTM (NBC), WTVH (CBS) and WSYT (FOX).** As part of Sinclair’s pending deal with Barrington, Sinclair will acquire WSTM (an NBC affiliate) covering the Syracuse, NY DMA, and assume Barrington’s existing sharing agreement with Granite Broadcasting Corporation to provide services to WTVH (a CBS affiliate). This preserves the existing virtual duopoly involving top four-rated stations in this market.¹⁴ Also, as part of the deal, Cunningham Broadcasting Corp. (“Cunningham”) will acquire WSYT (a FOX affiliate) in the Syracuse, NY DMA from Sinclair.¹⁵ Although Sinclair says it will not create a virtual triopoly by supporting the Cunningham station in this market,¹⁶ these companies are known to have close relations and coordination agreements in many other markets.¹⁷

Press reports indicate that local television station consolidation (characterized by one of its prime practitioners as “rolling M&A thunder”) will not stop with these transactions, either.¹⁸

These transactions, in combination with Senator Rockefeller’s recent call for a GAO study on the various ways broadcasters in local television markets coordinate their activities and the impact of these practices on the broadcast landscape and consumers, highlight the importance of the Commission’s focusing attention on this matter in its pending media ownership proceeding.¹⁹ It is ACA’s expectation

¹² KGPE Consummation Notice (filed Feb. 19, 2013).

¹³ In its license assignment application, Nexstar states that the resulting duopoly complies with the Commission’s rules because “KSEE is not ranked among the top-four stations in the DMA.” See BALCDT - 20130213ABR (Exh. 18, Multiple Ownership).

¹⁴ Sinclair Transaction Description at 3 n.6, 5.

¹⁵ *Id.* at 5.

¹⁶ *Id.*

¹⁷ See, e.g., Price Colman, *Station Trading Continues Comeback In IQ*, TVNewsCheck, Mar. 13, 2013 (“Sinclair’s David Smith ... has used proxy companies — including Cunningham Broadcasting, Deerfield Media and a newly formed Howard Stirk Holdings headed by Armstrong Williams — to own stations that he operates in markets where FCC rules say Sinclair cannot own them itself.”); Doug Halonen, *Sinclair Hops From Sixth To Third In Top 30*, TVNewsCheck, May 23, 2013 (Cunningham “function[s] essentially as [a] unit[.]” of Sinclair); Harry A. Jessell, *Sinclair Makes It A Triopoly In Baltimore*, TVNewsCheck, Nov. 29, 2012 (Sinclair viewed as having a triopoly because other stations in that market are owned by “Cunningham Broadcasting, Sinclair’s longtime duopoly partner that is controlled by trusts for the children of Sinclair’s controlling shareholders.”); Free Press, *Petition to Deny and For Other Relief, Applications of WXLV Licensee, LLC For Renewal of License of WXLV-TV, Winston-Salem, NC*, BRCT-20040730ART, etc., Nov. 1, 2004, available at <http://www.sinclairwatch.net/petition.pdf>.

¹⁸ See, e.g., Harry A. Jessell, *Broadcasting Bigness Raises Big Questions*, TVNewsCheck, May 10, 2013 (reporting that in broadcasting, “the hot station trading market is being fueled by sharply rising retrans revenue, cheap money and a permissive government” and that Nexstar’s “Perry Sook has had a vision. He knows what the broadcasting business will look like after a few more rounds of station consolidation – ‘rolling M&A thunder,’ he calls it.”); Harry A. Jessell, *Sook Forecasts More ‘Rolling M&A Thunder*, TVNewsCheck, May 9, 2013 (Sook tells securities analysts that station trading market will remain hot through the end of the year; “The kind of rolling M&A thunder . . . will probably continue through the balance of this year and 2014, probably at about the same pace as you’ve seen over the last 18 to 24 months”).

¹⁹ See Letter from John D. Rockefeller, IV, Chairman, United States Senate, Committee on Commerce, Science, and Transportation, to Mr. Gene L. Dodaro, Comptroller General, United States Government Accountability Office (May 13, 2013) (asking GAO to investigate the “increased use of SSAs by television stations since the last FCC

that the GAO study will provide new information and data on the coordination by separately owned, same market broadcasters – information that has not yet been submitted into the record. We presume this new evidence will prove useful to the Commission to determine all the ways in which broadcasters coordinate their activities, and which should be limited or banned, particularly where the Commission previously has not had sufficient information to reach such a conclusion. However, with respect to the practice of separately owned top four-rated stations in the same market coordinating their retransmission consent agreements, the record before the Commission in its pending media ownership review is not lacking. The Commission already has before it a complete record detailing the extent to which broadcasters are engaging in the practice and its anticompetitive effects. Accordingly, there is no reason for the Commission not to rule on this matter in its pending media ownership review.

A diverse group of parties, including small and large cable operators, direct broadcast satellite providers, unions, and public interest groups, have previously raised concerns about the competitive harms that occur when separately owned, same market broadcast television licensees enter into arrangements whereby they coordinate their activities, particularly related to retransmission consent negotiations and combining their news operations.²⁰ These practices circumvent local media ownership limits and protections by reducing competition in the local media marketplace, decreasing diversity, and diminishing journalistic independence. In a previous filing, ACA documented 65 instances of separately owned, same market broadcasters affiliated with a Big 4 network operating under some form of sharing agreement.²¹

For MVPDs and their customers, the diminution of local television station competition through coordination of retransmission consent negotiations is an increasingly pressing issue. As ACA has repeatedly pointed out, the practice of separately owned, same market broadcasters coordinating their negotiation of retransmission consent has become both widespread and increasingly common.²² For the last retransmission consent cycle, based on responses ACA member companies provided to ACA, it was reported that 48 pairs of separately owned Big 4 broadcasters in 43 different markets were engaging in this practice.²³ Attached to this letter is a list of these instances.

ACA member companies have attested to the fact that when two non-commonly owned Big 4 stations in a single market coordinate their retransmission consent negotiations, what little bargaining

media ownership review” and their effect on local broadcast competition, including their “impact on the overall programming costs paid by pay television providers”).

²⁰ Letter from American Cable Association, DISH Network, Free Press, The Newspaper Guild-CWA, Time Warner Cable to Chairman Genachowski, MB Docket Nos. 09-182, 10-71 (Nov. 14, 2011) (explaining how broadcasters are coordinating their activities through contractual arrangements and other means to avoid the FCC’s local television ownership rules resulting layoffs of station staff, reduced journalistic independence, and diminished competition for audiences, advertisers and multichannel video programming distributors (MVPDs) that carry these stations through retransmission consent agreements).

²¹ Letter from Barbara Esbin, Counsel to ACA, to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182, 10-71, at 2 (filed Nov. 19, 2012) (providing updated data concerning the number of separately owned, same market broadcasters affiliated with a Big 4 network operating under some form of sharing agreement).

²² Comments of the American Cable Association, MB Docket No. 09-182, at 13-27 (filed Mar. 5, 2012) (“ACA Media Ownership Comments”); Reply Comments of the American Cable Association, MB Docket No. 09-182, at 5-17 (filed Apr. 17, 2012) (“ACA Media Ownership Reply Comments”); Comments of the American Cable Association, MB Docket No. 10-71, at 5-22 (filed May 27, 2011) (“ACA Retransmission Consent Comments”); Reply Comments of the American Cable Association, MB Docket. No. 10-71, at 5-11 (filed June 27, 2011) (“ACA Retransmission Consent Reply Comments”).

²³ See Letter from 25 Smaller MVPDs to Julius Genachowski, Chairman, FCC, MB Docket Nos. 09-182, 10-71 (filed Feb. 4, 2013) (“25 Smaller MVPD Letter to FCC”).

power MVPDs have to secure retransmission consent at fair market value is materially reduced.²⁴ This is because the coordinating stations can withdraw two Big 4 stations simultaneously. ACA has shown through empirical evidence consistent with economic theory that this practice results in significant price increases of at least 22 percent.²⁵ The fact that separately owned, same market Big 4 stations can secure higher retransmission consent fees by coordinating their negotiations is strong evidence that broadcasters engaging in this practice are reducing competition in their local markets compared with broadcasters who are not coordinating their negotiations.

It is noteworthy that Nexstar and Mission, and Sinclair and Cunningham — which operate under various services agreements — alone represent more than *30 percent* of the instances of two Big 4 stations in the same market using a single representative to negotiate retransmission consent. There should be little doubt that once the instant transactions are consummated, the list of instances of coordinated retransmission consent negotiations will continue to grow.

Ironically, in 2011 Nexstar itself recognized the harm to local television competition when a single entity, in that case Granite Broadcasting, gained control of three of the Big 4 stations in a single market (in which Nexstar owned a station) through Granite's combination of ownership and services agreements with Malara Broadcasting. Nexstar took action to protect itself from this harm by filing a federal antitrust action seeking to have the combination broken up.²⁶ As ACA noted at the time, both the Nexstar action and ACA's advocacy before the Commission complain of the same competitive harm of a single broadcaster controlling the sales activities of other separately owned stations in the same DMA, through a combination of ownership and sharing agreements with non-commonly owned stations.²⁷

The Commission has had before it for some time ample record evidence that these practices result in harm to local competition and television service customers. It cannot continue to ignore that its local television ownership limits are being undermined through transactions and arrangements structured to create de facto duopolies that are prohibited by law and fail to take action in any proceeding.²⁸ With the Media Bureau cognizant of public interest harms, but either unwilling or unable thus far to end these abusive practices in the context of individual license transfer applications, the task of necessity falls to the

²⁴ See *id.* at 1-2.

²⁵ See ACA Media Ownership Comments at 9.

²⁶ Complaint, *Nexstar Broad., Inc. v. Granite Broad. Corp., et al.*, No. 1:11-cv-00249 (N.D. Ind. Jul. 25, 2011).

²⁷ Letter from Barbara S. Esbin, Counsel to ACA, to Marlene H. Dortch, MB Docket No. 10-71 (Aug. 3, 2011) (“Nexstar’s Complaint avers in essence that when a single station controls three of the top four network affiliates in the same market and two of the independent network affiliates for a total of five out of the six national networks, harm to local advertising purchasers and the consumers buying the advertised products results. This is *precisely the same underlying competitive harm* identified by ACA in its retransmission consent reform Comments and Reply Comments: competing sellers in a single market that coordinate their retransmission consent negotiations have the ability to exercise substantial market power over prices, and that this exercise of market power has and will cause retransmission consent prices to rise above competitive levels, to the detriment of MVPDs and their subscribers in the affected local market. ACA Retransmission Consent Comments at 6-7; ACA Retransmission Consent Reply Comments at 2-3.”); see also Letter from Matthew A. Brill, Counsel to Time Warner Cable, to Marlene Dortch, MB Docket Nos. 09-182, 10-71 (Aug. 3, 2011).

²⁸ See, e.g., KHNL/KGMB License Subsidiary, LLC, et al., Memorandum Opinion and Order and Notice of Apparent Liability for Forfeiture, 26 FCC Rcd 16087 (MB, 2011) ¶ 23 (recognizing that the transaction “is clearly at odds with the purpose and intent of the duopoly rule,” but deferring action on such practices); Letter from Barbara A. Kreisman, Chief, Video Division, FCC to Counsel re Assignment of License of KTKA-TV, from Free State Communications, LLC to PBC Broadcasting of Topeka License, LLC, Topeka, KS, ID No. 49397, File No. BALCDT-20110208ADB, 26 FCC Rcd 10310 (MB, Video Div., 2011) (denying ACA petition to deny, which demonstrated the significant likelihood of coordinated negotiation of retransmission consent agreements, because this is “one of the issues squarely under consideration in the Retransmission Consent Proceeding”).

Commission to act in the industry-wide rulemakings that have been pending before it for more than three years. In conclusion, the time is now for the Commission to explicitly recognize that these practices create an attributable ownership interest for a broadcaster engaging in any one of four practices of coordinated retransmission consent negotiations ACA and others have previously identified.²⁹

Sincerely,

A handwritten signature in black ink, appearing to read "Ross J. Lieberman". The signature is fluid and cursive, with the first name "Ross" being particularly prominent.

Ross J. Lieberman

Attachment (1)

cc (via email): William Lake
Michelle Carey
Sarah Whitesell
Matthew Berry
Alex Hoehn-Saric

²⁹ The four practices to be deemed attributable ownership interests are: (i) delegation of the responsibility to negotiate or approve retransmission consent agreements by one broadcaster to another separately owned broadcaster in the same DMA; (ii) delegation of the responsibility to negotiate or approve retransmission consent agreements by two separately owned broadcasters in the same DMA to a common third party; (iii) any informal or formal agreement pursuant to which one broadcaster would enter into a retransmission consent agreement with an MVPD contingent upon whether another separately owned broadcaster in the same market is able to negotiate a satisfactory retransmission consent agreement with the same MVPD; and (iv) any discussions or exchanges of information between separately owned broadcasters in the same DMA or their representatives regarding the terms of existing retransmission consent agreements, or the status of negotiations over future retransmission consent agreements. ACA Media Ownership Comments at 26-27; ACA Media Ownership Reply Comments at 11-17.

**48 Instances of Separately Owned, Same-Market Broadcasters Affiliated with a Big 4 Network
Simultaneously Negotiating Retransmission Consent With an MVPD Using a Single Representative**

DMA	DMA Rank	Station #1			Station #2		
		Owner (also Controlling Entity)	Call Letters	Affil.	Owner	Call Letters	Affil.
Columbus, OH	32	Sinclair Broadcast Group	WSYX	ABC	Cunningham Broadcasting	WTTE	FOX
Jacksonville	50	Newport Television	WAWS	FOX	High Plains Broadcasting	WTEV	CBS
Providence-New Bedford	53	LIN TV	WPRI	CBS	Super Towers	WNAC	FOX
Wilkes Barre-Scranton-Hztn	54	Nexstar Broadcasting Group	WBRE	NBC	Mission Broadcasting	WYOU	CBS
Dayton	63	Sinclair Broadcast Group	WKEF	ABC	Cunningham Broadcasting	WRGT	FOX
Charleston-Huntington	65	Sinclair Broadcast Group	WCHS	ABC	Cunningham Broadcasting	WVAH	FOX
Springfield, MO	75	Schurz Communications	KYTV	NBC	Perkin Media	KSPR	ABC
Cedar Rapids-Wtrlo-IWC&Dub	89	Sinclair Broadcast Group	KGAN	CBS	Second Generation of Iowa	KFXA	FOX
Savannah	92	New Vision Television	WJCL	ABC	Parkin Broadcasting	WTGS	FOX
Baton Rouge	94	Communication Corp of America	WGMB	FOX	White Knight Broadcasting	WVLA	NBC
Burlington-Plattsburgh	95	Smith Media	WFFF	FOX	Lambert Broadcasting	WVNY	ABC
Greenville-N. Bern-Washngtn	99	Bonten Media Group	WCTI	ABC	Esteem Broadcasting	WFXI	FOX
Johnstown-Altoona-St Colge	102	Peak Media	WWCP	FOX	Palm Television	WATM	ABC
Lincoln & Hastings-Krny	105	Pappas Telecasting	KHGI	ABC	Omaha World-Herald	KFXL	FOX
Tyler-Longview(Lfkn&Ncgd)	107	Communication Corp of America	KETK	NBC	White Knight Broadcasting	KFXK	FOX
Fort Wayne	109	Granite Broadcasting	WISE	NBC	Malara Broadcasting Group	WPTA	ABC
Youngstown	110	New Vision Television	WKBN	CBS	Parkin Broadcasting	WYTV	ABC
Augusta-Aiken	111	Media General	WJBF	ABC	Schurz Communications	WAGT	NBC
Peoria-Bloomington	116	Granite Broadcasting Crop.	WEEK	NBC	Barrington Broadcasting	WHOI	ABC
Peoria-Bloomington	116	Nexstar Broadcasting Group	WMBD	CBS	Sinclair Broadcast Group	WYZZ	FOX
Fargo-Valley City	117	Hoak Media	KVLY	NBC	Parker Broadcasting	KXJB	CBS
Traverse City-Cadillac	120	Heritage Broadcasting Group	WWTV	CBS	Cadillac Telecasting	WFQX	FOX
Columbus, GA (Opelika, AL)	127	Raycom Media	WTVM	ABC	Southeastern Media Holdings	WXTX	FOX
Amarillo	130	Nexstar Broadcasting Group	KAMR	NBC	Mission Broadcasting	KCIT	FOX
Chico-Redding	131	Catamount Holdings	KHSL	CBS	Evans Broadcasting	KNVN	NBC
Wilmington	132	Raycom Media	WECT	NBC	Southeastern Media Holdings	WSFX	FOX
Columbus-Tupelo-W Pnt-Hstn	133	WTVA, Inc.	WTVA	NBC	Southern Broadcasting	WKDH	ABC
					Lingard Broadcasting	WLOV	FOX
Rockford	134	Nexstar Broadcasting Group	KQRF	FOX	Mission Broadcasting	WTVO	ABC
Topeka	136	New Vision Television	KTCA	ABC	Parkin Broadcasting	KSNT	NBC
Monroe, LA-El Dorado	137	Hoak Media	KNOE	CBS	Parker Broadcasting	KAQY	ABC
Monroe, LA-El Dorado	137	Nexstar Broadcasting Group	KARD	FOX	Mission Broadcasting	KTVE	NBC
Duluth-Superior	139	Granite Broadcasting	KBJR	NBC	Malara Broadcast Group	KDLH	CBS
Wichita Falls & Lawton	142	Nexstar Broadcasting Group	KFDX	NBC	Mission Broadcasting	KJTL	FOX
Wichita Falls & Lawton	142	Drewry Broadcast Group	KSWO	ABC	Hoak Media	KAUZ	CBS
Lubbock	143	Nexstar Broadcasting Group	KLBK	CBS	Mission Broadcasting	KAMC	ABC

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		Owner (also Controlling Entity)	Call Letters	Affil.	Owner	Call Letters	Affil.
Erie	146	Nexstar Broadcasting Group	WJET	ABC	Mission Broadcasting	WFXP	FOX
Erie	146	SJL of Pennsylvania	WICU	NBC	Lilly Broadcasting	WSEE	CBS
Sioux City	147	Titan TV Broadcast Group	KPTH	FOX	Waitt Broadcasting	KMEG	CBS
Anchorage	148	Coastal Television Broadcasting	KTBY	Fox	Vision Alaska	KYUR	ABC
Joplin-Pittsburg	149	Nexstar Broadcasting Group	KSNF	NBC	Mission Broadcasting	KODE	ABC
Joplin-Pittsburg	149	Saga Communications	KOAM	CBS	Surtsey Media	KFJX	FOX
Rochestr-Mason City-Austin	153	Quincy Newspapers	KTTC	NBC	SagamoreHill Broadcasting	KXLT	FOX
Terre Haute	154	Nexstar Broadcasting Group	WTWO	NBC	Mission Broadcasting	WFXW	FOX
Gainesville	163	CP Media	WGFL	CBS	MPS Media	WNBW	NBC
Abilene-Sweetwater	164	Nexstar Broadcasting Group	KTAB	CBS	Mission Broadcasting	KRBC	NBC
Billings	168	Nexstar Broadcasting Group	KSVI	ABC	Mission Broadcasting	KHMT	FOX
Casper-Riverton	196	Mark III Media	KGWC	CBS	Silverton Broadcasting	KTWO	ABC
					Wyomedia	KFNB	FOX
San Angelo	197	Nexstar Broadcasting Group	KLST	CBS	Mission Broadcasting	KSAN	NBC