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June 21, 2013

Ms. Marlene Dortch  
Secretary  
Federal Communication Commission  
445 12<sup>th</sup> St. SW  
Washington, DC 20554

**Re: MM Docket No. 09-182**  
**2010 Quadrennial Regulatory Review**  
**Ex Parte Notice**

Dear Ms. Dortch:

On Thursday, June 20, 2013, the undersigned had meetings with Acting Chairwoman Clyburn, Commissioner Rosenworcel, Commissioner Pai, and William Lake, Chief of the Media Bureau, and members of their respective staffs, to urge repeal of the newspaper/radio cross-ownership rule. The following clients of this firm participated in the meetings:

Dale Miller, President of West Virginia Radio Corp. (2 radio stations co-owned with the *Dominion Post*, a daily newspaper published in Morgantown, West Virginia, and 25 radio stations in other West Virginia and Maryland markets).

Joyce McCullough, President of LaSalle County Broadcasting Corp. (3 radio stations co-owned with the *News-Tribune*, a daily newspaper published in LaSalle, Illinois, and Publisher of the *News Tribune*).

Brad Hughes, Vice President and Director of Operations, WJAG, Inc. (3 radio stations co-owned with the *Norfolk Daily News*, a daily newspaper published in Norfolk, Nebraska)

In these meetings, our clients urged repeal of the cross-ownership ban based on their experience as newspaper and radio station cross owners in different parts of the country, and on the conclusion of the Minority Media and Telecommunications Council's recent study that repeal will have no impact on minority or female ownership of radio. Our clients provided information showing (1) in their respective markets, newspaper paid subscribership and advertising revenue has declined while the number of traditional media outlets (new radio and TV stations,

Ms. Marlene Dortch

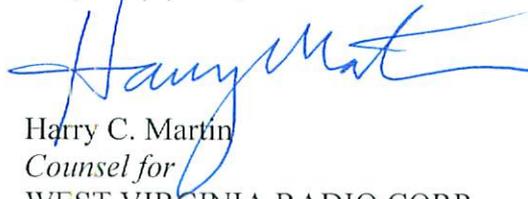
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newspapers and cable) has increased exponentially since the newspaper-radio cross-ownership rule went into effect nearly 40 years ago; (3) completion from traditional media combined with intense Internet-based competition, which has been devastating to newspaper subscribership and revenues, has significantly diminished the market power and influence of cross-owned daily newspapers; (4) in the Norfolk, Nebraska, and LaSalle, Illinois, markets, the rule has blocked upgrades of after-acquired radio stations, keeping them from reaching their full potential in terms of audience reach and revenue generation; and (5) by blocking cross ownership of struggling newspapers by radio stations, and *vice versa*, the rule has caused reductions in journalism jobs as well as a loss of quality in local news reporting, particularly in small and medium markets.

This notice is filed pursuant to Section 1.1206(b) of the Commission's rules. If you have any questions regarding this submission, please do not hesitate to contact the undersigned.

Very truly yours,



Harry C. Martin

*Counsel for*

WEST VIRGINIA RADIO CORP.

LASALLE COUNTY BROADCASTING CORP.

WJAG, INC.

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