**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, D.C. 20554**

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| In the Matter of | ) | |
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| 2010 Quadrennial Review -- Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Communications Act of 1996 | )<br>)<br>)<br>)<br>) | MB Docket No. 09-182 |
| | ) | |
| Promoting Diversity of Ownership In the Broadcasting Services | )<br>) | MB Docket No. 07-294 |

# <u>COMMENTS OF MORRIS COMMUNICATIONS COMPANY, LLC</u>

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July 22, 2013

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**COMMENTS OF MORRIS COMMUNICATIONS COMPANY, LLC**

Morris Communications Company, LLC ("Morris") hereby submits these comments in response to the Public Notice released on June 7, 2013, in the above-captioned proceedings.[1] The Public Notice seeks comment on a study that the Minority Media and Telecommunications Council ("MMTC") commissioned and submitted into the record, entitled *The Impact of Cross Media Ownership on Minority/Women Owned Broadcast Stations* (the "*MMTC Study*").[2] As detailed below, the *MMTC Study* provides additional real world evidence confirming that cross-ownership of daily newspapers and broadcast stations does not have a material adverse effect on minority or female ownership of broadcast stations. Considered in conjunction with the overwhelming evidence already in the record establishing the potential public interest benefits of cross-ownership and the dramatic and ever-increasing competitive challenges facing the newspaper industry as well as television and radio broadcasting, the *MMTC Study* provides

[1] *See Commission Seeks Comment on Broadcast Ownership Report*, Public Notice, DA 12-1946 (MB, rel. Dec. 3, 2012) ("Public Notice").

[2] *See The Impact of Cross Media Ownership on Minority/Women Owned Broadcast Stations*, Mark R. Fratrik, Ph.D., Vice President/Chief Economist, BIA/Kelsey (May 30, 2013), attached to *Ex Parte* Letter from David Honig, MMTC, to Marlene H. Dortch, MB Docket Nos. 09-182, 07-294 (May 30, 2013).

further compelling support for abandoning the Commission's long-outdated restrictions on common ownership of newspapers and broadcast stations.

## I. INTRODUCTION AND SUMMARY

Morris is one of the country's strongest mid-sized, privately held media companies, with diversified holdings including two newspaper/radio combinations operated pursuant to temporary waivers of the newspaper/broadcast cross-ownership rule ("NBCO Rule").[3] As explained in Morris' earlier filings, the record in this proceeding strongly supports repeal of the NBCO Rule in its entirety and, at the very least, elimination of the restriction on newspaper/*radio* cross-ownership (the "NRCO Rule").[4] Morris' earlier filings also demonstrate that its combinations reflect a longstanding journalistic heritage and commitment to serving the news and informational needs of its local communities and thus provide real-world evidence of the public interest benefits that flow from common ownership of radio stations and newspapers. Morris also has previously shown that elimination of the NRCO rule will have no negative impact on minority or female broadcast station ownership levels, and that the FCC can better

[3] Specifically, Morris operates co-located radio/newspaper combinations in Topeka, Kansas and Amarillo, Texas. *See* Comments of Morris Communications Company, LLC, MB Docket Nos. 09-182, 07-294, , at 1-2 (filed Mar. 5, 2012) ("*Morris NPRM Comments*").

[4] *See generally id.* Morris has long advocated complete repeal of the entire newspaper/broadcast cross-ownership rule, including both its television and radio components. *See, e.g., id.*; Comments of Morris Communications Company, LLC, MB Docket No. 09-182 (filed July 12, 2010); Comments of Morris Communications Company, LLC, MB Docket No. 06-121 (filed Oct. 23, 2006); Comments of Morris Communications Corporation, MB Docket No. 02-277 (filed Jan. 2, 2003); Comments of Morris Communications Corporation, MM Docket No. 01-235 (filed Dec. 3, 2001). For purposes of this filing, and without waiving any arguments it has previously presented, Morris will focus on the newspaper/radio component of the cross-ownership ban because it is the most pertinent to its current business activities.

address ownership diversity issues by implementing certain specifically targeted proposals that have long been pending before the Commission.[5]

As discussed below, the *MMTC Study* confirms that cross-ownership of broadcast stations and newspapers does not have a material adverse impact on minority or female broadcast ownership and thus clearly bolsters the case for deregulation. Morris also discusses in these comments another recent study, conducted by the Pew Research Center's Project for Excellence in Journalism, [6] which provides additional support for repeal of the NBCO Rule or, at the very least, its newspaper/radio component. The *Pew Study* adds to the already overwhelming evidence in this proceeding that the newspaper industry is struggling to compete with an ever-increasing number of competitors in the local news ecosystem, and that the radio industry likewise faces dramatic challenges from an expanding array of new audio programming sources. Taken together, the *MMTC Study* confirms that the Commission cannot justify a decision to retain cross-ownership restrictions based on generalized concerns about minority or female broadcast ownership, and the concurrent *Pew State of the News Media Study* provides additional compelling support for repeal. The end result in this proceeding should be elimination of the NBCO Rule in its entirety or, at a minimum, repeal of the NRCO Rule.

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[5] *See* Reply Comments of Morris Communications Company, LLC, MB Docket Nos. 09-182, 07-294 (filed Jan. 4, 2013) ("*Morris Minority/Female Ownership Report Reply Comments*").

[6] *See* Pew Research Center's Project for Excellence in Journalism, *The State of the News Media 2013: An Annual report on American Journalism* (Mar. 18, 2013), *available at* http://stateofthemedia.org/ (last visited May 1, 2013) ("*Pew State of the News Media Study*" or "*Pew Study*").

## II. <u>THE *MMTC STUDY* CONFIRMS THAT NEWSPAPER/BROADCAST CROSS-OWNERSHIP DOES NOT HAVE A MATERIAL ADVERSE IMPACT ON MINORITY OR FEMALE OWNERSHIP.</u>

As Morris and others have explained before, although minority and female ownership of broadcast stations remains disproportionately low, there is no reliable evidence that newspaper/broadcast cross-ownership is responsible for this situation.[7] The *MMTC Study* confirms that cross-ownership of newspapers and broadcast stations does not appreciably impact minority or female ownership, and that cross-ownership therefore is "not sufficiently noticeable to station operators" so as "to be a material justification for tightening or retaining the [NBCO] rule[]."[8] This conclusion was based on survey responses to questions that were designed to identify whether the existence of a cross-media combination disparately impacts women or minorities in terms of competition or the provision of news and information.

With respect to competition, the majority of the respondents, including both minority/female broadcasters and all others, identified sources *other than* local cross-media operations as their most significant direct competitors.[9] And when asked open-ended questions about the factors and challenges they face in selling advertising, not one mentioned the presence of a cross-media combination.[10] Instead, they pointed to competition from other broadcast

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[7] *See, e.g.*, *Morris Minority/Female Ownership Report Reply Comments*, at 2-4 (citing others).

[8] *MMTC Study*, at 10-11.

[9] *Id.* at 5-6. The only exceptions were three respondents in a single market that all identified the same cross-media operation. One of these respondents was a minority or women-owned station and two were not. *Id.* at 6 & n.6. Because the responses were the same regardless of the race or gender of the respondent, this set of answers provides no evidence that the presence of a cross-media combination disproportionately impacts women or minorities. Instead, this set of responses suggests, at most, that the cross-owned properties happened to be strong competitors in the particular market at issue, and certainly not that ownership of a co-located newspaper was somehow a "game changer" in the market.

[10] *Id.* at 6-7.

stations and other media, as well as external factors such as the generally slow state of the economy.[11] Similarly, the responses to questions about emerging sources of competition evidenced a general "lack of concern about the cross-media operation as an emerging competitor," with only one respondent—a non-minority/non-female broadcaster—even mentioning a cross-owned combination, and most referring to online or digital media.[12]

The responses to questions regarding the challenges that broadcasters might face in providing news and information followed a similar trend, with not a single respondent mentioning the cross-media operation.[13] And, when asked which competitors provide news and information, only two respondents noted the cross-owned combination, and neither of those respondents was a minority or female broadcaster.[14]

In the end, there was "simply *no difference* in the responses from the minority and/or women owned stations and . . . other[s]."[15] The study's author was, moreover, "struck by the lack of any large concern by almost all of the respondents to the[] cross-media operations."[16] The *MMTC Study* therefore confirms that potential new entrants and existing broadcast competitors, regardless of their race or gender, are challenged by the same "general business

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[11] *Id.* at 6-7.

[12] *Id.* at 7.

[13] *Id.* at 8.

[14] *Id.* at 9. It is not surprising that a broadcast station cross-owned with a newspaper would provide news and information. Indeed, as is the case with Morris' operations, cross-media combinations often provide significant local news coverage.

[15] *Id.* at 5-6.

[16] *Id.* at 9.

concerns that all radio and television stations have in all markets," and *not* by the presence of newspaper/broadcast combinations.[17]

Opponents of relaxation have already begun criticizing the *MMTC Study*, contending, among other things, that its sample size was too small, that it inadequately explained the demographic makeup of the study participants and markets involved, and that it failed to analyze newspaper/television cross-ownership separately from newspaper/radio cross-ownership.[18] However, these pro-regulatory parties have themselves never offered a shred of actual evidence that maintenance of the rule is necessary to further *any* public interest goal. While they criticize the *MMTC Study* for providing "at best . . . some interesting anectodal information," their own contention that consolidation exacerbates the barriers faced by women and minorities is conclusory in the extreme.[19] As such, it cannot possibly form the basis for a lawful determination by the Commission that the NBCO Rule in its current form remains "necessary in the public interest" as required by Section 202(h) of the Telecommunications Act of 1996.[20]

Nor is there any reliable evidence to suggest that removing the artificial restrictions on efficient business structures imposed by the NBCO Rule will harm ownership diversity. To the contrary, all indications are that allowing additional flexibility would enhance the ability of all entities—whether owned by minorities, women, or otherwise—to compete for broadcast viewers and listeners. Indeed, as former FCC Chairman Reed Hundt recently noted, although "[i]t is important that minority views . . . have the chance to be heard," there is "no way for the FCC to

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[17] *Id.* at 9-10.

[18] *See* Letter from Matt Wood, Free Press, to Marlene H. Dortch, MB Docket Nos. 09-182, 07-294 (June 26, 2013).

[19] *Id.* at 3.

[20] Pub. L. No. 104-104, 110 Stat. 56 (1996).

accomplish this laudable goal by controlling who can own a newspaper."[21] Rather than clinging to the unsupported notion that retaining the NBCO Rule might somehow improve the picture for minorities and women in broadcasting, the Commission should directly address the disparities that exist in broadcast station ownership by acting on long-pending, targeted initiatives that are specifically designed to improve ownership diversity.[22] Indeed, it is long past time to reject the hyperbolic and alarmist claims of self-appointed public interest advocates, fully acknowledge the transformative changes in the information marketplace that have occurred over the past four decades, and end the regulatory paralysis that has left in place rules designed to address the media world of a bygone era.

## III. <u>THE *PEW STUDY* CONFIRMS THAT, AT THE VERY LEAST, THE NEWSPAPER/RADIO CROSS-OWNERSHIP RESTRICTION SHOULD BE REPEALED.</u>

The record already developed in the Quadrennial Review proceeding also demonstrates beyond any possible question that the newspaper industry is struggling to compete with an ever-increasing number of competitors in the local news ecosystem. The radio industry likewise faces dramatic challenges from an expanding array of new audio programming sources. The *Pew State of the News Media Study* confirms and provides additional compelling documentation of these trends.

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[21] Reed Hundt, *The FCC Should Repeal its Newspaper-Broadcast Ownership Rule*, WASH. POST, June 6, 2013, Opinions, *available at* http://articles.washingtonpost.com/2013-06-06/opinions/39789368_1_fcc-rule-reed-hundt-social-media ("Hundt Op-Ed").

[22] *Morris Minority/Female Ownership Reply Comments*, at 5-6. Although the Supreme Court's recent decision in *Fisher v. Texas* makes clear that strict scrutiny would apply to any race-conscious policies, many of the proposals currently before the Commission are race-neutral and would not trigger that heightened standard of constitutional review. *See* Patric Taylor, *Fisher Decision Opens Door for FCC to Act Affirmatively in Considering Diversity Proposals*, http://broadbandandsocialjustice.org/2013/07/fisher-decision-opens-door-for-fcc-to-act-affirmatively-in-considering-diversity-proposals/ (July 1, 2013).

With respect to the condition of newspapers, the *Pew Study* addresses a number of developments that present serious concerns for newspaper publishers and the American public alike and therefore must inform the Commission's actions in this proceeding. Chief among these are the continuing cutbacks in newsroom staff that "put the industry down 30% since its peak in 2000 and below 40,000 full-time professional employees for the first time since 1978."[23] The *Pew Study* suggests that these cutbacks have not just resulted in fewer reporters working harder to cover the same amount of news, but that they have also caused decreases in the total amount of news covered by papers.[24] And overall readership has continued to decline, with the percentage of adults saying they read a newspaper "yesterday" dropping again in 2012 for all age groups except for 18-to-24 year olds.[25] As more readers turn elsewhere to get their news and information, newspaper subscription and advertising revenues will only decline further, forcing publishers to consider even more cutbacks. This is, to say the least, a troubling pattern of events in an industry that is already struggling.

In their efforts to adapt to the new digital era, newspapers have started to put more and more content online, hoping to gain back lost revenues through digital advertising and subscriptions. But the *Pew State of the News Media Study* notes that, notwithstanding these efforts, revenues continue to decline, "with print revenue dipping below $20 billion" in 2012.[26] This is the sixth consecutive year in which newspapers have experienced revenue losses, and the

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[23] *Pew State of the News Media Study*, Introduction, at 1; *see id.* Newspapers: Stabilizing, but Still Threatened, at 32.

[24] *Id.*, Introduction, at 2; *see id.* at 12.

[25] *Id.*, Newspapers: Stabilizing, but Still Threatened, at 33.

[26] *Id.*, Introduction, at 9.

2012 loss alone was substantial, at approximately $1.5 billion, or 7.3%.[27] The decrease in revenues in 2012 reflected significant declines in print advertising revenues across various categories, including a 10% loss in national advertising, a 6.5% loss in retail advertising, and a loss of more than 15% in real estate classifieds.[28] The *Pew Study* found that currently, "[p]rint advertising revenue is just 45% of what it was in 2006."[29] The *Pew Study* also calls into question how much newspapers can expect to rely on digital advertising revenue to offset declining earnings from print, finding that "digital ad revenue [is] growing at an anemic 3% a year in the newspaper industry."[30] As the number of options for advertising on the Internet continues to expand, the prices that newspapers can charge for digital ads necessarily decline, compounding the problems that the newspaper industry faces in this area.[31]

The advertising revenue drop-offs experienced by newspapers have made digital subscriptions "an increasingly vital component of any new business model for journalism— though, in most cases," the *Pew Study* finds, "they fall far short of actually replacing the revenue lost in advertising."[32] Moreover, investing fully in digital distribution technology is expensive. Indeed, the *Pew Study* indicates that producing apps enabling users to view content on mobile devices ranges from $100,000 for a "top-of-the-line iPad app," to $35,000 for a "modest one," with these costs not even taking into account the fact that to make content truly available to

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[27] *Id.*, Newspapers: Stabilizing, but Still Threatened, at 1.

[28] *Id.* at 13, 22-23. Further, since 2000, real estate classified advertising revenue has declined by more than 80%. *Id.*

[29] *Id.* at 21.

[30] *Id.*, Introduction, at 4; *id.*, Newspapers: Stabilizing, but Still Threatened, at 2.

[31] *See id.*

[32] *Id.*, Introduction, at 4.

everyone, everywhere, newspaper publishers would have to make similar investments in apps for Android devices and other Apple competitors.[33] At the same time, the *Pew Study* finds that "there is a measure of hope in the industry," particularly for publishers like Morris itself, which "has a new generation of family leadership and is putting digital transformation foremost in its strategy."[34] As the newspaper industry struggles to adapt to meet the shifting preferences of consumers, the FCC should "welcome the support" that cross-ownership can offer.[35]

Radio stations similarly are facing intense and ever-increasing competition for audiences and advertisers. Although the radio industry stayed above-water in 2012, the *Pew State of the News Media Study* finds that this was possible only due to radio's "heavy reliance on election spending."[36] Radio revenues grew a modest 1% last year, but "even that small gain is deceiving" because "the $124 million in election ad spending offset declines in other sectors, but won't be around to do so in 2013."[37] The *Pew Study* finds that "advertising spending from regular radio sectors like [the] communications, financial services, insurance and restaurant industries fell by 6% to 13% by late 2012."[38] Moreover, radio stations, like newspapers, currently earn the smallest percentage of their revenues from digital advertising.[39] On the other hand, online-only and satellite radio providers had better years in 2012 than in the past, and have earned more

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[33] *Id.*, Newspapers: Stabilizing but Still Threatened, at 7.

[34] *Id.* at 17.

[35] Hundt Op-Ed.

[36] *Pew State of the News Media Study*, Introduction, at 9; *see id.*, Radio: Digital Drives Listener Experience, at 1, 9, 27.

[37] *Id.*, Introduction, at 10; *see id.*, Radio: Digital Drives Listener Experience, at 1, 9, 27.

[38] *Id.*, Radio: Digital Drives Listener Experience, at 9.

[39] *Id.*, Introduction, at 10.

positive long-term forecasts from analysts, in part because they are not so dependent on political spending.[40] And some new digital entrants, such as Pandora, have even begun to establish local advertising sales teams to try to compete directly with over-the-air radio stations for local ad revenues.[41]

Radio stations have continued to lose listeners even while moving to provide online streams of their programming to satisfy their audience's growing appetite for digital. Indeed, the *Pew Study* finds that "online-only options are drawing in a greater portion of the audience," with online-only listening growing to 57% (from 48% in 2006) and AM/FM streaming declining to 40% (from 46% in 2006) as of 2011.[42] As reported in the *Pew Study*, 39% of Americans now listen to online audio monthly, and 29% listen at least once a week.[43] Pandora, which was "on the brink of shuttering its doors in 2008," increased its listenership to 150 million registered users in 2012, an addition of 100 million users in just one year.[44] Spotify, another online-only listening platform, has also recently entered the U.S. market and is experiencing increasing listenership.[45] According to the *Pew State of the News Media Study*, these and other online-only audio platforms pose "[o]ne of the biggest threats to AM/FM" radio.[46] Indeed, "[d]rive-time—once the premier domain of terrestrial radio—is becoming overtaken by mobile devices," with

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[40] *Id.*, Radio: Digital Drives Listener Experience, at 1, 10.

[41] *Id.* at 10.

[42] *Id.* at 5.

[43] *Id.* at 23.

[44] *Id.* at 10, 28. Pandora reports 59.9 million "active" users (*i.e.*, those listening at least monthly), up from 30 million in January 2011. *Id.*

[45] *Id.* at 10-11.

[46] *Id.* at 23.

the number of cell phone owners saying that they stream content in their cars tripling over the last three years.[47] Satellite radio also continues to experience significant audience growth. The *Pew Study* indicates that Sirius/XM "attracted 2 million new subscribers in 2012 to reach 23.9 million, an increase of 9%, its biggest yearly growth ever."[48]

At the same time, broadcast radio is being cited less often as an important source of local news. Indeed, the *Pew State of the News Media Study* finds that "in the broader array of audio platforms news is becoming a smaller piece of the pie."[49] Although in 1990 more than half of study respondents said they had listened to radio news "yesterday," the percentage declined to only one-third in 2012.[50] Another recent survey conducted by Gallup confirms that radio is cited less and less as a main source of news, with only 6% of respondents saying they get most of their news from radio.[51] Further, a mere 9% of respondents to the Gallup poll selected newspapers as their main source of news, while 55% cited television and 21% cited the Internet.[52] The number of all-news stations has remained small, at 37 stations as of the end of 2011.[53] These findings further undermine any basis for concern that common ownership of newspapers and radio

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[47] *Id.*, Introduction, at 13.

[48] *Id.*, Radio: Digital Drives Listener Experience, at 5-6.

[49] *Id.*, Introduction, at 7; *see id.*, Radio: Digital Drives Listener Experience, at 1.

[50] *Id.*, Introduction, at 7; *see id.*, Radio: Digital Drives Listener Experience, at 2, 21.

[51] Gallup, *TV Is Americas' Main Source of News*, July 8, 2013, http://www.gallup.com/poll/163412/americans-main-source-news.aspx ("*Gallup News Study*").

[52] *Id.*

[53] *See Pew State of the News Media Study*, Introduction, at 13; *id.*, Radio: Digital Drives Listener Experience, at 3. Only 25 of these 37 stations have a large enough audience to be measured by Arbitron, and those 25 stations can be heard in only 19 U.S. markets. *See id.*, Radio: Digital Drives Listener Experience, at 3. Their total listenership is just 1.5% of Americans 12 and older. *Id.*

stations might harm diversity or localism. Rather, they show that it is now more important than ever to permit newspaper publishers to commit their journalistic resources to enhancing and increasing the local news services provided by radio stations.

The *Pew Study* and *Gallup News Study* also confirm, as Morris and others have shown before, that traditional media, including newspapers and radio stations, are but one part of an already large and ever-increasing number of sources from which Americans get news. Taking the 2012 election as one example, the *Pew Study* finds that "newsmakers and others with information they want to put into the public arena have become more adept at using digital technology and social media on their own, without any filter by the traditional media."[54] Indeed, as former FCC Chairman Reed Hundt noted in arguing for repeal of the rule, "the rule is perverse" in part because "the Internet makes plenty of information available to all" and thus places real competitive pressures on newspapers.[55] In light of these and the other competitive pressures facing newspapers and broadcast stations, they can hardly be viewed as unique in their ability to influence the news consumption habits of Americans, let alone the viewpoints of the public.

In sum, the record in this proceeding was already replete with evidence of the daunting and ever-increasing competitive pressures facing the newspaper and radio industries and the fact that radio is now generally viewed as a less dominant source of local news than it may have been in the past. The *Pew State of the News Media Study* provides still further confirmation that these trends are real and that they are continuing. Particularly when combined with the evidence that cross-owned radio stations—including those owned by Morris—provide broader and deeper

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[54] *Id.*, Introduction, at 1.

[55] Hundt Op-Ed; *see also Gallup News Study* (listing various sources from which Americans get news).

local news and informational coverage, the record clearly demonstrates that the time for repeal of the NRCO Rule is now.

Indeed, Morris' cross-owned stations have multiple staff members devoted fully to covering local stories and issues, and are in this respect unique among many radio stations today that do not have even a single reporter on staff. This commitment to local journalism translates into more and better news coverage for local radio listeners and increased engagement by stations in their local markets, and shows how allowing newspaper publishers to own radio stations can benefit communities and improve the state of journalism. At a time when the newspaper and radio industries are struggling to compete with a rapidly growing array of multimedia competitors, with some observers even forecasting the death of printed dailies, repeal of the NRCO Rule is necessary to level the playing field for publishers and radio broadcasters by permitting combinations that make sense for today's listeners and readers. These two forms of media should no longer be hampered in their ability to enter into cooperative business arrangements that, on the whole, will improve and expand their ability to continue their long tradition of providing local news and information to the communities that they serve.

## IV. CONCLUSION

For reasons set forth above and in its previous filings in this proceeding, Morris urges the Commission to move forward promptly to repeal the NBCO Rule or, at a minimum, to eliminate the NRCO Rule. In this and other appropriate proceedings, the FCC should also evaluate and adopt specifically targeted proposals designed to foster broadcast station ownership by minorities and women.

Respectfully submitted,

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