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March 12, 2014

VIA ELECTRONIC FILING

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

**Re: Notice of Ex Parte Communication,
MB Docket Nos. 09-182, 07-294, 10-71**

Dear Ms. Dortch:

Please find attached a copy of an ex parte communication from Joshua Pila, Senior Counsel of LIN Television Corporation d/b/a LIN Media to Maria Kirby, Legal Advisor – Media, Consumer and Governmental Affairs, and Enforcement, for Roger Sherman, Acting Chief of the Wireless Telecommunications Bureau.

Should you have any questions about this correspondence, please let me know.

Very truly yours,

/s/

John K. Hane

CC (via email): Maria Kirby
Joshua Pila

From: Joshua Pila <joshua.pila@linmedia.com>
Sent: Tuesday, March 11, 2014 8:11 PM
To: MARIA.KIRBY@FCC.GOV
Cc: Hane, John K.
Subject: JSA Investment

Dear Ms. Kirby,

This correspondence follows up on our recent meeting in which we discussed LIN's concern with the proposal to attribute broadcast joint sales agreements ("JSAs"). In our meeting you asked for information about the percentage of revenue of a station receiving joint sales services that is reinvested in local programming.

In 2011, Vaughan Media acquired WBDT in Dayton, Ohio. Vaughan entered into a JSA with WDTN, a local news leader that LIN has owned and operated for many years. Time Warner Cable, which was opposed to the JSA, objected to the application. The FCC conducted a full and thorough review of the transaction before approving it over Time Warner Cable's objection. In 2013, LIN's investment in local programming on WBDT was approximately 25% of the station's revenue (net of sales commissions).

In late 2012, LIN acquired ownership of WKBN in Youngstown, Ohio, and entered into a JSA with WYTV. In 2013 LIN's investment in local programming on WYTV was also approximately 25% of the station's net revenue.

Also in late 2012 LIN acquired ownership of WJCL in Savannah, Georgia, and entered into a JSA with WTGS. In 2013 LIN's investment in local programming on WTGS was approximately 7% of the station's net revenue. Over the last several years, LIN has invested heavily in providing more and better local programming across its footprint. As a part of that ongoing effort, LIN has planned to make significant new investments in local programming for both WJCL and WTGS. If the FCC decides to attribute JSAs, which would require LIN to unwind key aspects of its relationship with WTGS, LIN will naturally have to reconsider its investment in the market.

We are disappointed in the tentative agenda item released today disclosing that the Chairman proposes to attribute JSAs, but we want to be responsive to your request regardless. We believe attribution of JSAs, and certainly attribution of JSAs disclosed to the Commission and passed upon in transactions (as all of LIN's JSAs were), would be a serious disservice to the public interest and will almost certainly result in less local news and other local programming in markets LIN serves.

Please let me know if you have other questions. We will, of course, file this correspondence in the appropriate dockets.

Very truly yours,

Joshua N. Pila
Senior Counsel
LIN Media