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March 21, 2014

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

RE: *2010 Quadrennial Regulatory Review*, MB Docket
No. 09-182

*Diversification of Ownership in the Broadcasting
Services*, MB Docket No. 07-294

*Attribution of Joint Sales Agreements in Local
Television Markets*, MB Docket No. 04-256

Dear Ms. Dortch:

Pursuant to section 1.1206(b) of the Commission's rules, this letter provides notice regarding an *ex parte* communication in the above referenced proceedings.

On March 20, 2014, James C. Joyce, President of the National Association of Broadcast Employees and Technicians-CWA and Debbie Goldman, Telecommunications Policy Director, Communications Workers of America, AFL-CIO, met with Gigi B. Sohn, Special Counsel for External Affairs. They were accompanied by Andrew Jay Schwartzman and Eric Null of the Institute for Public Representation, and Catherine Yang, a Georgetown University Law Center student.

Mr. Joyce explained that sharing arrangements such as SSAs and JSAs are “job killers.” Based on his knowledge of the industry, he stated that he is

unaware of any SSA or JSA that has resulted in the creation of any additional jobs. He pointed out that the reduction in TV stations' workforces is not just bad for economic welfare of their localities, but it also impairs the community's right to have diverse sources of programming. Mr. Joyce made reference to his March 12, 2014 *ex parte* letter to the Chairman, which described in detail the adverse impact of sharing arrangements in several cities. For example, in Syracuse, New York, 40 employees at station WTVH lost their jobs and the community lost a separately programmed newscast service with competing news departments. Mr. Joyce also made reference to the 2011 report by Professor Danilo Yanich of the University of Delaware entitled "Local TV News & Sharing Agreements: A Critical Look." Local TV News & Service Agreements: A Critical Look." That report describes the pervasiveness and impact of such arrangements. It can be accessed at:

<http://files.cwa-union.org/national/News/Misc/dyanich-news-service.pdf>

Mr. Joyce, Ms. Goldman and Mr. Schwartzman also discussed the importance of enforcing the Commission's attribution rules to promote diversity. They cited Free Press' study entitled "Out of The Picture 2007: Minority & Female TV Station Ownership in the United States," which used econometric analysis to suggest that the probability that a given station is minority-owned is significantly lower in more concentrated markets, even if market and station characteristics are held constant. This result is also seen when examining the probability that a market will have a minority-owned station. These findings suggest that the likely outcome of further industry consolidation and concentration will be fewer minority-owned stations and markets with minority owners. The study can be accessed at:

<http://www.freepress.net/sites/default/files/resources/otp2007.pdf>

Mr. Joyce, Ms. Goldman and Mr. Schwartzman called for immediate Commission action on both JSAs and SSAs, stating that there is already an ample record with respect to SSAs. They argued in particular that the Commission should immediately require full online disclosure of JSAs and SSAs, without redactions. Making such information public, they said, will enable the Commission and stakeholders to analyze and assess the impact of such arrangements which will facilitate more effective policymaking.

Respectfully submitted,



Andrew Jay Schwartzman

cc. Commissioner Rosenworcel
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