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March 24, 2014

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

***Via Electronic Filing***

**Re: MB Docket No. 09-182 – 2010 Quadrennial Regulatory Review**

Dear Ms. Dortch,

On Thursday, March 20, 2014, I spoke briefly by telephone with Gigi B. Sohn, Special Counsel for External Affairs to Chairman Wheeler, to discuss issues in the above-captioned docket.

During the call, I described the problems with NAB's self-styled "compromise" proposal for attribution of Joint Sales Agreements ("JSAs"), noting that it merely would allow broadcasters to continue operating under the status quo. Thus, it would allow continued but unlawful *de facto* transfers of control when an entity other than the licensee controls all or nearly all of a "serviced" stations' revenues and local programming.

I also noted that while 75 percent of current black-owned full power TV stations may indeed be operated under JSAs, that 75 percent figure equals just three stations out of four. JSAs and other management agreements are not a cure for that appallingly low number – they are one of the prime causes for it.

In 2006, there were nineteen black-owned full-power commercial television stations. None of them were party to such management agreements. Those nineteen stations' licensees kept all their stations' revenues and profits. Now, the JSA owners keep approximately one-tenth of the profits.

Respectfully submitted,

/s/ Matthew F. Wood

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cc: Gigi B. Sohn