

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

In the Matter of	)	
	)	
2014 Quadrennial Regulatory Review –	)	MB Docket No. 14-50
Review of the Commission’s Broadcast	)	
Ownership Rules and Other Rules Adopted	)	
Pursuant to Section 202 of the	)	
Telecommunications Act of 1996	)	
	)	
2010 Quadrennial Regulatory Review –	)	MB Docket No. 09-182
Review of the Commission’s Broadcast	)	
Ownership Rules and Other Rules Adopted	)	
Pursuant to Section 202 of the	)	
Telecommunications Act of 1996	)	
	)	
Promoting Diversification of Ownership	)	MB Docket No. 07-294
In the Broadcasting Services	)	
	)	
Rules and Policies Concerning	)	MB Docket No. 04-256
Attribution of Joint Sales Agreements	)	
In Local Television Markets	)	

**COMMENTS OF DELMARVA BROADCASTING COMPANY, STEINMAN  
STATIONS, INC., AND LANCASTER NEWSPAPERS, INC.**

Affiliates Delmarva Broadcasting Company (“Delmarva Broadcasting”), Steinman Stations, Inc. (“Steinman”) and Lancaster Newspapers, Inc. (“LNP”), all members of the Steinman Communications group of companies, 1/ submit these Comments in response to the Further Notice of Proposed Rulemaking and Report and Order issued by the Federal Communications Commission (the “FCC” or “Commission”) seeking comment on the

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1/ Steinman, through its subsidiary, Delmarva Broadcasting, owns and operates radio stations licensed by the Commission in the Wilmington and Delmarva regions of Delaware and in Northern Maryland, but, given the existing bar on daily newspaper/radio cross-ownership, not in the Lancaster,

Commission’s 2014 and 2010 Quadrennial reviews, 2/ and in particular on the newspaper/broadcast cross-ownership rule (“NBCO rule”) and its subset, the newspaper/radio cross-ownership rule. 3/

Specifically in regard to the newspaper/radio cross-ownership rule, the record already before the Commission establishes that this restriction does not advance the Commission’s interest in promoting viewpoint diversity, and consequently should be eliminated so as to permit the common ownership of newspapers and radio stations in all markets, within the prescribed limits of the local radio ownership rule. 4/ Such a long-overdue reformation of the Commission’s prohibition on newspaper/radio cross-ownership would allow expertise, resources and capital to flow between newspaper and radio broadcasting entities, bolstering their respective abilities to provide quality sources of news and information to the public across multiple delivery platforms.

Local newspapers have been an important source of news and community information throughout our nation’s history. In the past century, radio emerged as a critical real-

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[Footnote continued]

Pennsylvania area, where affiliate LNP publishes the daily *The Intelligencer Journal/Lancaster New Era*, the seventh oldest newspaper in the United States, along with monthly and weekly regional newspapers.

2/ *In the Matter of 2014 Quadrennial Regulatory Review — Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996; 2010 Quadrennial Regulatory Review — Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, MB Docket Nos. 14-50, 09-182, Further Notice of Proposed Rulemaking and Report and Order, FCC 14-28 (rel. Apr. 15, 2014) (“*FNPRM*”).

3/ 47 C.F.R. § 73.3555(d).

4/ *See FNPRM* at ¶¶ 145-46.

time source of locally produced news and entertainment of importance in cities and towns across the country. Although these important community resources have not been replaced or replicated, changes in technology and habit have grown the number and diversity of real-time news and entertainment. As a result, the basis for the Commission's 1975 prohibition on traditional media cross-ownership has vanished and that prohibition is obsolete.

When the Commission enacted in 1975 the newspaper/broadcast cross-ownership rule prohibiting the ownership of a daily newspaper and any "full-power broadcast station that serviced the same community," it sought to limit media concentration in TV and radio markets, because they use public airwaves, which is a valuable and limited resource. This rule emphasized the need to ensure that a broad number of voices were given the opportunity to communicate via different outlets in each market.

The media world of 1975 is very different than our contemporary environment. In 1975, cable television was in its infancy, satellite television had not yet been made available to consumers, and the Internet was but a gleam in an engineer's eye. Viewpoint diversity was a valid concern for the FCC at that time. Today, every community has access to multiple diverse news and information voices. Broadcast television, hundreds of cable and satellite channels, multiple print and digital brands offering content from hundreds of thousands of credible news, information and entertainment websites from all over the world are available in every market in the United States. In other words, viewpoint diversity is but a click or keystroke away for virtually every American.

Americans not only have access to multiple voices that are available digitally, they have adapted to these new digital delivery systems quickly through their use of computers, tablets and smartphones. The Pew Research Center Journalism Project survey shows that **news is a**

**substantial part of what people access on each of their platforms and devices.** <sup>5/</sup> Pew reports that in 2013, **82% of Americans said they got news on a desktop or laptop and 54% said they got news on a mobile device.** <sup>6/</sup> Moreover, the majority of Americans across generations now combine a mix of sources and technologies to get their news each week, according to a March 2014 Media Insight Project survey. <sup>7/</sup> The Media Insight Project survey found that **there are five devices or technologies that majorities of Americans use to get news in a given week; the average American adult uses four different devices or technologies for news.** <sup>8/</sup> Pew reports that of surveyed Americans, **digital and on-line sources were accessed for daily news more than radio or newspapers.** <sup>9/</sup> In addition, **for American adults under 30, social media has far surpassed newspapers and has equaled TV as a primary source of daily news,** according to a study of news consumption trends by the Pew Research Center. <sup>10/</sup>

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<sup>5/</sup> See Pew Research Journalism Project, State of the Media, Key Indicators in Media & News (Mar. 26, 2014) available at <http://www.journalism.org/2014/03/26/state-of-the-news-media-2014-key-indicators-in-media-and-news/>.

<sup>6/</sup> See *id.*

<sup>7/</sup> See Media Insight Project, The Personal News Cycle: How Americans choose to get their news (March 17, 2014) available at <http://www.americanpressinstitute.org/publications/reports/survey-research/personal-news-cycle/>.

<sup>8/</sup> See *id.*

<sup>9/</sup> See Pew Research Journalism Project, News Media Indicators Database, Where Americans Get News (Sep. 27, 2012) available at <http://www.journalism.org/media-indicators/where-americans-get-news/>.

<sup>10/</sup> See *id.* at Section 1: Watching, Reading and Listening to the News, available at <http://www.people-press.org/2012/09/27/section-1-watching-reading-and-listening-to-the-news-3/>.

Our home market of Lancaster, Pennsylvania is a strong example of the media diversity that permeates America in 2014. Consider the follow facts:

1. Eleven radio stations are licensed in Lancaster County, Pennsylvania, and a total of 53 stations are in the region with recorded listening, according to Nielsen Audio.
2. Seven television stations are home to the Harrisburg-Lancaster-Lebanon-York DMA. Philadelphia and Baltimore television stations are available in the market along with hundreds of other stations and networks through cable and satellite television services. The DMA contains 714,000 television households. As of May 2014, cable TV penetration in the market is estimated to be 63% and other pay TV, including satellite penetration is at 30%; a total that covers up to 93% of the viewing population.
3. In addition to the 6 newspapers and publications of Steinman-owned Lancaster Newspapers, Inc., Engle Publishing produces 10 newspapers and 9 specialty publications in Lancaster County and 10 more in surrounding counties. Additionally, 8 other online and print newspapers originate in Lancaster County and nearby Lebanon and York Counties.<sup>11/</sup>
4. Hundreds of news and information websites are accessed by hundreds of thousands of Lancaster County consumers.

Citizens of Lancaster County access many different sources each day for news, information, entertainment and services. The 11 radio stations, 7 television stations and 20+ publications in the market area are but the starting point. Lancaster County residents also make millions of individual visits to an array of credible local Internet news, information, and entertainment sources each month.

In the instant news and publishing world, barriers to entry have been removed. Anyone can publish articles to his or her own website, to a blog or to a shared community site. One can provide audio and video media to the web relatively inexpensively. Sites like Twitter and Instagram further promote the free exchange of information and diversity of viewpoint in a fashion not contemplated by the FCC in 1975.

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<sup>11/</sup> See [onlinenewspapers.com](http://onlinenewspapers.com).

Notwithstanding the ease of access to audiences for virtually anyone with an Internet connection, access is not synonymous with reliability. Quality and credibility are often demanded by insightful consumers of content. The Steinman Communications group of companies has a long history of responsible, fair and balanced coverage of all news stories along with skilled, high quality reporting and presentation. Our award-winning newsgathering organizations create a productive synergy between broadcast and print reporting that provides robust content and useful audience-focused interaction. Our approach to news coverage, informed discussion on local and broader issues, and our demonstrated record of providing considerable community access to our facilities creates considerably more community benefit for a newspaper-radio collaboration, not less.

The time is right for the Commission to end the prohibition of newspaper/radio cross-ownership. The prohibition does nothing to provide access to a diversity of viewpoints in this digital age. Instead, the prohibition inhibits the ability of trained communications professionals from deploying their skills and expertise across multiple distribution channels to the detriment of the public.

Respectfully submitted,

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