

# Journal Inquirer

September 29, 2011

**Secretary  
Federal Communications Commission  
445 12th St. SW  
Washington, DC 20554**

Dear People:

This is to summarize the presentation made yesterday on behalf of the Journal Inquirer and Journal Publishing Co. Inc. by conference call to Federal Communications Commission staff members in regard to the Tribune Co. broadcast license case involving Connecticut, MB Docket No. 10-104.

Participating in the conference call for the FCC were Barbara Kreisman, chief of the FCC's video division; David Brown, associate division chief; and David Roberts, attorney adviser in the video division.

-- Company stockholder Neil H. Ellis said our newspaper is being seriously harmed financially and in competition for readers by Tribune's combining Connecticut's largest newspaper, the Hartford Courant, with television stations WTIC-TV61 and WTXN-TV20. Ellis noted that the operations of the Courant and the TV stations have been completely combined and that profits from the television side of the operation are being used to discount costs on the newspaper side and thereby undercut newspaper competitors. Ellis said he does not believe that Tribune Co.'s bankruptcy proceeding should interfere with the FCC's adjudication of the TV license issues in Connecticut, those issues being separate and the FCC having full jurisdiction over them.

-- As vice president and managing editor, I noted that because of this combination the Tribune properties can offer news sources far more exposure than competing newspapers and television stations can. I also noted that Tribune's Connecticut properties are constantly promoting each other. I asked whether Tribune in Connecticut is subject to one set of FCC rules while everyone else here is subject to another set of rules, and how we can know exactly what the rules are.

**[MORE]**

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-- Journal Inquirer advertising vice president Bill Sybert reported that Tribune leverages its combination of its newspaper and TV stations to sell advertising, and in some cases provides advertising in one vehicle or the other for free, a huge advantage over competitors, made possible only by the government's award of two television station licenses to a newspaper company. Sybert noted that the self-promotion in the Courant and TV stations is overwhelming and would cost anyone else hundreds of thousands of dollars for just a short period. The Courant and the TV stations, Sybert said, are now combined in a company called CT1 Media under the supervision of a single executive, and there are no longer separate advertising representatives for the newspaper and TV stations.

-- Journal Inquirer circulation vice president Gary Catania reported that the Courant offers extensive discounts to subscribers, bringing the Courant's subscription price far below the subscription prices that can be offered by competing newspapers that do not have television stations in Connecticut.

We ask for prompt enforcement against Tribune Co. of the FCC's rule against ownership of television stations and newspapers in the same market.

Thanks for your consideration.

Sincerely,

**CHRIS POWELL**  
**Vice President and Managing Editor**

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