

# Journal Inquirer

September 30, 2011

Barbara Kreisman, Chief  
Video Division  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Via Overnight

Dear Ms. Kreisman:

In our telephone conversation Wednesday you indicated that the Federal Communications Commission is delaying action on the issue of Tribune Co.'s cross-ownership of television stations and a newspaper in Connecticut until Tribune Co.'s bankruptcy is resolved in federal bankruptcy court.

We have reviewed both plans proposed to the court and neither suggests any changes to the cross-ownership situation in Connecticut.

The Second Amended Joint Plan of Reorganization submitted by the unsecured creditors, which include Oaktree Capital Management, Angelo Gordon & Co., and JP Morgan Chase Bank, says on Page 66 at 5.17 that proponents promised nothing other than that they will use their best efforts to cooperate in "diligently pursuing and in taking all reasonable steps necessary to obtain the requisite FCC Approvals. ..."

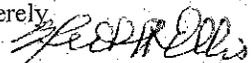
The Third Amended Plan of Reorganization submitted by Aurelius Capital Management on behalf of its managed entities refers to the FCC applications at 5.16, Page 86: "The pending FCC Application shall be amended as promptly as practicable to reflect the Noteholder Plan and the Noteholder Specific Disclosure Statement, and the Debtors shall be required to assist the Proponents in the preparation and filing of such amended FCC Applications. The Debtors, the Senior Lenders, the Senior Noteholders, and any other Holders of Claims receiving New Common Stock under the Noteholder Plan shall use their best efforts to cooperate in diligently pursuing and in taking all reasonable steps necessary to obtain the requisite FCC Approvals. ..."

So it would seem that the FCC's delay of action in the Tribune cross-ownership matter is not required by anything in bankruptcy court. Whichever bankruptcy plan is approved will leave Tribune in the same position in Connecticut, in violation of the cross-ownership rule.

Meanwhile the Journal Inquirer is being seriously harmed every day by the FCC's failure to enforce the rule.

We would appreciate your early response to our request for enforcement as we are contemplating petitioning the bankruptcy court for recognition as a contingent creditor of Tribune under a pending lawsuit brought by the Journal Inquirer against Tribune's Hartford Courant property.

Sincerely,

  
Neil H. Ellis

cc: David Roberts  
Federal Communications Commission

**Stanley Brand, Esq.**

# Journal Inquirer

October 20, 2011

Barbara Kreisman, Chief  
Video Division  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

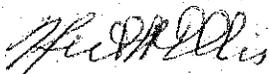
Dear Ms. Kreisman:

Please find enclosed a new proposal from the Hartford Courant which virtually gives away the newspaper for nothing.

As you can see, their pricing is considerably below cost. It is especially so when you realize that Groupon takes 50% of the proceeds.

We again, call your attention to the failure of the FCC to enforce laws which can force newspapers such as ours out of business through the unfair competition caused by the failure to enforce the cross-ownership rule.

Sincerely,



Neil H. Ellis

NHE/gp

enclosure

cc: David Roberts  
Federal Communications Commission

# "Hartford Courant" – Redeem From Home

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\$26

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