

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

In the Matter of:) MB Docket No. 13-203
)
Applications Seeking Consent to Transfer)
Control of License Subsidiaries of)
Allbritton Communications Company to)
Sinclair Television Group, Inc. and Applications)
Seeking Consent to Assignment of Broadcast)
Station Licenses from Sinclair Television)
Group, Inc. to Deerfield Media (Birmingham))
Licensee, LLC, Deerfield Media (Harrisburg))
Licensee, LLC, and HSH Charleston (WMMP))
Licensee, LLC)

To: Chief, Media Bureau

SUBMISSION FOR THE RECORD

Sinclair Television Group, Inc. (“Sinclair”), by its attorneys, hereby provides a Submission for the Record in order to correct factual misstatements and to respond to new matters raised¹ in the reply filings of Free Press and Put People First! PA (“Free Press”),² American Cable Association (“ACA”),³ and Rainbow PUSH Coalition (“RPC”)⁴ (collectively, the “Petitioners”) in this proceeding.⁵ Each of the Petitioners opposes the applications to assign the licenses of stations WTTO(TV), Homewood, Alabama, WABM(TV), Birmingham, Alabama, and WHP-TV, Harrisburg, Pennsylvania to Deerfield Media (Birmingham) Licensee, LLC, or Deerfield Media (Harrisburg) Licensee, LLC and to assign the license of WMMP(TV),

¹ To the extent the FCC deems it necessary, Sinclair hereby requests leave to file the instant submission in order to ensure an accurate record before the Commission.

² See Free Press Reply to Oppositions, (Oct. 24, 2013) (“Free Press Reply”).

³ See ACA Reply to Applicants’ Oppositions to Petition to Deny or, in the Alternative, for Conditions, (Oct. 24, 2013) (“ACA Reply”).

⁴ See RPC Reply to Oppositions to Petition to Deny, (Oct. 24, 2013) (“RPC Reply”).

⁵ Sinclair filed a Consolidated Opposition to Petitions to Deny in response to Free Press, ACA, and RPC in this proceeding on September 26, 2013.

Charleston, South Carolina to HSH Charleston (WMMP) Licensee, LLC (“HSH”), and RPC opposes the entire transaction.⁶

There is no disagreement that the Petitioners oppose commercial arrangements that are widely used in the television broadcast industry to achieve economies of scale while complying with the FCC’s local ownership rules. The FCC has rejected identical arguments in other proceedings that Petitioners make here.⁷ In every case the challenged transactions have been approved and the Bureau has rejected the same arguments again and again. Yet the Petitioners persist, challenging transaction after transaction even as the agency continues to find that the transactions in fact do comply with FCC rules and policies. Petitioners’ new challenges to the transactions here are simply proxies for their dissatisfaction with existing and settled law. The Petitioners do not deny that the previous transactions have been approved over objections indistinguishable from those they raise here. And they do not deny that they participated in rulemaking proceedings in which they asked the FCC to adopt rules and policies that would prohibit the type of transaction proposed here – implicitly if not directly acknowledging that existing law and policy permits these transactions.

Petitioners are seeking to overturn established law and policy by repeatedly mischaracterizing the FCC’s rules and precedent in opposing transactions like those in the instant case: unexceptional transactions that fully comport with long-established rules and policies. Sinclair will briefly respond to each of the reply filings below in order to ensure an accurate factual record exists before the Commission in this proceeding.

⁶ See BALDCT-2013809ADC, *et al.* and FCC Public Notice DA 13-1751 (rel. Aug. 14, 2013).

⁷ See, e.g., *SagamoreHill of Corpus Christi Licenses, LLC*, 25 FCC Rcd. 2809 (2010); *Nexstar Broad., Inc.*, 23 FCC Rcd. 3528 (2008); *Piedmont Television of Springfield License LLC*, 22 FCC Rcd. 13910 (2007); *Chelsey Broad. Co. of Youngstown, LLC*, 22 FCC Rcd. 13905 (2007); *Malara Broad. Grp. of Duluth Licensee LLC*, 19 FCC Rcd. 24070 (2004).

Free Press Reply. The *Free Press Reply* repeats the unsupported and unsupportable allegation that Deerfield Media (Birmingham) Licensee, LLC, Deerfield Media (Harrisburg) Licensee, LLC and HSH are “shell” companies of Sinclair. Free Press makes this assertion repeatedly in its Reply but never cites to or provides any evidence whatsoever to back up that claim. As in its Petition to Deny, Free Press asserts that the applicants have the obligation to prove their proposed transactions comply with law.⁸ That does not mean, however, that applicants are required to rebut any unsupported accusations or conclusory opinions that are submitted in the record. It is the petitioner’s burden to establish a substantial and material question of fact that a grant of the application would be inconsistent with the public interest.⁹ Deerfield and HSH are legitimate business entities and each is owned and managed by operators with years of experience in the broadcast industry.¹⁰ As Sinclair pointed out in its Opposition, the willingness of Free Press, without a shred of tangible evidence, to label Deerfield and HSH as “shell” companies is both irresponsible and offensive. And as legal and procedural matters, the applicants have no burden to disprove the opinions of Free Press.

Free Press also mischaracterizes the FCC’s rules in claiming that the proposed transactions “violate the duopoly rule,”¹¹ even though the FCC has approved numerous transactions indistinguishable from the instant case. As explained above, what Free Press really means is that the transactions do not comport with a version of the duopoly rule Free Press has asked the Commission to adopt.¹² The transactions and associated agreements are squarely

⁸ See *Free Press Reply* at 2.

⁹ See, e.g., *WWOR-TV, Inc.*, Memorandum Opinion and Order, 6 FCC Rcd. 193, 197 n.10 (1990), *aff’d sub nom. Garden State Broad. L.P. v. FCC*, 996 F.2d 386 (D.C. Cir. 1993), *reh’g denied* (D.C. Cir. Sept. 10, 1993).

¹⁰ See Sinclair Opposition at 5.

¹¹ *Free Press Reply* at 2-4.

¹² Free Press has made repeated submissions in the FCC’s Quadrennial Review Proceeding asking the FCC to attribute stations that are parties to shared services agreements.

within the boundaries of what the Commission has repeatedly approved in the past,¹³ and in approving each one of those applications the Commission specifically concluded that the transactions complied with the rules and the public interest after review.

As Sinclair has explained, the proposed arrangements here similarly conform fully with the FCC's rules and established precedent. Under the Deerfield and HSH services agreements, Deerfield and HSH will retain full control over the operations of the stations, including programming and editorial policies and personnel in compliance with the FCC's rules, and will be responsible for all costs and expenses associated therewith. They will remain entirely responsible for maintaining a main studio, in compliance with FCC rules and compliance with all other FCC rules and regulations. Sinclair may provide up to 15% of the programming of each of the stations, but the station licensees will retain ultimate authority with respect to the selection and procurement of programming on the stations, whether it is their own programming or the programming provided by Sinclair. The *Free Press Reply* manufactures a narrative which is simply not the truth in an effort to block a transaction that fully complies with the FCC's rules (but not with the rules Free Press would like the FCC to adopt).

In response to the repeated claims of Free Press that operation of duopolies, and the provisions of services pursuant to SSAs, lead to a reduction in local news operations, Sinclair showed the opposite in its Opposition – that in fact Sinclair had increased news staffing throughout its operations, and that news which Sinclair lawfully provided under SSA arrangements permitted news to be provided in situations where it would otherwise be uneconomical. Faced with having its main public interest arguments disproven, Free Press claims for the first time in its Reply that the Commission should ignore Sinclair's expanded news

¹³ See *supra*, n. 6.

efforts because, according to Free Press, they generate profits. Sinclair is not surprised that Free Press would denigrate profits as a legitimate business goal. In fact, however, Sinclair does not make profits from all of its news operations, and has expanded news even in instances where they are not self-supporting. While Sinclair certainly hopes that the efforts of its news operations will attract viewers to each of its stations, as well as to those to which it provides support services, the immediate profitability of each Sinclair news unit is not the determinative factor in its decisionmaking.

Free Press states that “Sinclair’s employment levels [have declined] over the past decade”¹⁴ as if the FCC regulates the number of employees the television industry must employ. Additionally, while average numbers of total employees may have fallen, as Sinclair demonstrated in its Opposition, the company has actually increased the company’s news personnel (and the amount of news that it produces), has expanded into smaller markets (which tend to have fewer employees) than those in which the company has historically operated, and, as a result of technical advances and in order to deal with increased competition for viewers and for advertising dollars, the industry in general has been moving to a more efficient hub model where technical operations are provided for numerous stations/markets at a single location. Although a not-for profit entity like Free Press may prefer for broadcasters to hire more personnel, as a public, for-profit company, Sinclair must operate in the real world and respond to the changes in the competitive landscape that requires innovation. Broadcasters must be both innovative and efficient to deliver profits to shareholders while still providing the most watched television programming for free to anyone who wishes to receive it.

¹⁴ *Free Press Reply* at 8-9.

While Free Press has been filing abusive challenges to proposed broadcast transactions that fully comply with the FCC's rules, it may not have noticed that in the "past decade" many businesses and industries have seen a decline in their overall employee numbers. This is due to both technological change and elimination of duplicative positions.¹⁵ The irony is that an entity that names itself "Free Press" wishes to impose even more burdensome regulations on the only press that is universally free. Unlike Free Press, Sinclair cannot rely on contributions from a few wealthy donors,¹⁶ and cannot simply pretend that the economic model supporting free over-the-air television stations is the same as it was fifty years ago. For these reasons the Free Press filings should be rejected by the Commission.

ACA Reply. Much like Free Press, ACA is improperly attempting to use this transaction as a rulemaking proceeding. ACA states in its Reply that the proposed transaction would somehow result in unfair "negotiating leverage" in retransmission negotiations. ACA has made this argument in myriad other proceedings and contexts. Like a dog with a bone, ACA refuses to let go of this issue, even though the FCC has rejected the ACA's argument on numerous occasions. In this instance, the ACA goes even further to distort the relevant facts of the case.

¹⁵ For example, a decade ago, many stations required extensive staffing just to air their advertising, from receipt of video tapes from advertisers and agencies, establishment and management of libraries of such tapes, the manual scheduling of those advertisements for airing in the traffic department, the insertion of those video tapes into machines for playback in master control, and the like. Now ads are received electronically, stored on hard drives, scheduled through computer traffic programs, and automatically aired at the correct time, with an enormous reduction in personnel needs and improvement of quality and performance.

¹⁶ It is ironic that Free Press, purportedly dedicated to transparency and broad public involvement in the media, and so critical of the financial arrangements between Sinclair and the companies to which it provides services, does not disclose the source of its own funding. A review of the Free Press 2011 IRS Form 990 public disclosure, the most recent form shown on the Free Press website, shows that Free Press has elected to delete the names of its major contributors from public disclosure. The report does show, however, that seven unidentified contributors provided \$2.25 million (78.5%) of the \$2.86 million in total contributions to that entity, and that a single contributor contributed \$750,000 (26.2%) of the total. This belies Free Press's efforts to portray itself as a broadly based and funded organization. See <http://www.freepress.net/sites/default/files/Free-Press-2011-990.pdf>.

In its Reply, ACA asserts that “this transaction presents novel questions of law, fact, and policy, including the critically important issue of using SSAs to circumvent the Commission’s ownership rules.”¹⁷ As ACA is without a doubt aware, however, the Commission has reviewed scores of applications for transfer or assignment of television stations involving SSAs, JSAs, options, and similar arrangements for the past ten years or more, and these applications have been regularly approved by the Commission because they comply with the multiple ownership rules.¹⁸ Even more disingenuous is that ACA has been a party to a number of proceedings identical (from the perspective of the ACA’s supposed interest) to the instant case. While ACA attempts to bend over backwards in an effort to distinguish the instant case from the many cases that the Commission has approved, ACA falls flat on its face. Just like every other identical case the Commission has approved, upon consummation of the transactions, Sinclair (or its affiliates) will provide sales and other non-programming support services to each of these stations pursuant to customary shared services agreements and joint sales agreements.

The arguments made by ACA are purely speculative and ACA is unable to point to a single rule violation by Sinclair or anyone else. The Commission has previously rejected claims essentially identical to those raised here and has stated that “[t]he gravamen of ACA’s petition” concerns matters “squarely under consideration in the Retransmission Consent Proceeding,” and concluded that “[w]e will not address here the substance of that proceeding, and we decline to reach a decision that would effectively pre-judge the outcome of a pending proceeding in favor

¹⁷ *ACA Reply* at 7.

¹⁸ *See, e.g., SagamoreHill of Corpus Christi Licenses, LLC*, 25 FCC Rcd. 2809 (2010); *Nexstar Broad., Inc.*, 23 FCC Rcd. 3528 (2008); *Piedmont Television of Springfield License LLC*, 22 FCC Rcd. 13910 (2007); *Chelsey Broad. Co. of Youngstown, LLC*, 22 FCC Rcd. 13905 (2007); *Malara Broad. Grp. of Duluth Licensee LLC*, 19 FCC Rcd. 24070 (2004).

of one of the parties that petitioned to commence it.”¹⁹ The Commission should take the same position here. The D.C. Circuit has also recognized the impropriety of seeking to apply new requirements in the context of licensing proceedings, highlighting the “arbitrariness of retroactive application and the inherent constraints of the adjudicatory process.”²⁰ As the Supreme Court has stated and the Commission has recognized, “rulemaking is generally a better, fairer, and more effective method of implementing a new industry-wide policy than is the uneven application of conditions in isolated license [related] proceedings.”²¹ As the Commission has done many times in the past, the Commission should reject ACA’s retransmission consent claims.

RPC Reply. As the Commission has explicitly stated, reply comments may not raise new arguments or provide data that post-dates the filing of an Opposition. Yet that is precisely what RPC did here. First, RPC cites to a Wall Street Journal article regarding Sinclair’s station operations in Columbus.²² The Commission long ago determined that hearsay, such as that contained in newspaper articles is not reliable evidence of the truth of the matters stated in the article.²³ Consequently, the newspaper article “evidence” supplied by RPC in its Reply should be stricken from the record in this proceeding. In any event, the article makes no allegations of rules violations by Sinclair, and points out that Sinclair is following policies adopted by the Commission.

¹⁹ *Free State Commc'ns, LLC*, 26 FCC Red. at 10312.

²⁰ *California Ass'n of the Physically Handicapped, Inc. v. F. C. C.*, 840 F.2d 88, 96-97 (D.C. Cir. 1988).

²¹ *Cnty. Television of S. Cal. v. Gottfried*, 459 U.S. 498, 511 (1983); *see also In re Application of Great Empire Broad., Inc. and Journal Broad. Corp.*, 14 FCC Red. 11145, 11148 (1999). *Cnty. Television of S. Cal. v. Gottfried*, 459 U.S. 498, 511 (1983); *see also In re Application of Great Empire Broad., Inc. and Journal Broad. Corp.*, 14 FCC Red. 11145, 11148 (1999).

²² *RPC Reply* at 1-2.

²³ *See, e.g., Pikes Peak Broad. Co.*, Memorandum Opinion and Order, 12 FCC Rcd. 4626, 4630 (1997) *citing RKO General, Inc. v. FCC*, 670 F.2d 215 (D.C. Cir. 1981), *cert. denied*, 456 U.S. 927 (1982); *Rothschild Broad., Inc.*, Memorandum Opinion and Order, 10 FCC Rcd. 7226, 7227 (1995).

EXHIBIT 1

Contact: Barry Faber, EVP & General Counsel
(410) 568-1500

Sinclair Comments on Inaccurate and Irresponsible Report Released by Free Press

BALTIMORE (October 24, 2013) – Sinclair Broadcast Group, Inc. (“Sinclair” or the “Company”) (Nasdaq: SBGI) commented today on a recent anti-consolidation “report” by the so-called “public interest” group, Free Press, that misrepresents not only the completely legal actions by numerous broadcast companies, but also the impact of such structures on news coverage in local markets. Such statements are particularly egregious given that Sinclair reached out to Craig Aaron, the President and CEO of Free Press, earlier this year to provide facts completely contrary to the statements in Free Press’ Report and offered to discuss the issues further with Mr. Aaron. Sinclair received no response whatsoever to the letter sent to Mr. Aaron, a copy of which is attached to this press release, indicating that Free Press does not wish to have the facts interfere with its political agenda.

Despite the actions of broadcasters in providing services to television stations they do not own being completely legal, publicly disclosed and fully considered and approved by the Federal Communications Commission (“FCC”), Free Press outrageously claims broadcasters are engaging in “covert” arrangements, using “loopholes” and acting “in direct violation of the law.” In addition, despite specific evidence to the contrary, Free Press claims that, “[t]his wave [of acquisitions] is leaving in its wake shuttered newsrooms and jobless journalists in communities all across the country” resulting in “the devastation of community-centered journalism.” Such inaccurate, irresponsible and potentially defamatory comments made by a group that declined a direct offer from Sinclair to become better informed, demonstrates the bias and complete lack of credibility of Free Press, which should be taken into account when considering all past and future comments the group makes.

David Smith, President and CEO of Sinclair, commented, “To set the record straight, every transaction we have entered into completely complies with the law and the regulations of the FCC and where required, as was true in most cases, were approved by the FCC after full disclosure of each aspect of our transactions. While we respect the right of Free Press to express its opinion on the advisability of the FCC’s rules, we vehemently object to their misguided and offensive claims that broadcasters who simply follow the FCC’s rules are using “shell companies” and “shady tactics” to “dodge” FCC rules.

“Moreover, contrary to the apparently intentionally uninformed views expressed by Free Press, there is no question on the positive contributions and the substantial investments we have made in the local markets we operate, especially in the newsrooms. In the past 18 months alone, we have added a net 77 positions across our organization, of which 72 were news related. Many of the stations we purchased were dressed for sale, emerging from bankruptcy or under invested by their prior owners. We have fully staffed those stations, as well as made significant investments in capital upgrades, programming and promotion.

“Not only have we created jobs, but we have added 81 hours of local news per week, allowing us to deliver an increasing number of meaningful local news stories to our viewers. We have made significant investments to upgrade stations to high-definition newscasts so that our consumers can have a high-quality news experience. But most importantly, through our news efforts, we have helped countless communities in crisis recover, most recently in Moore and Oklahoma City where, through our local news stations, our Sinclair Relief Fund raised more than \$600,000 for local charities to help those communities recover from tragedy.

“In the past year, Sinclair TV stations have held more than 40 ‘Your Voice Your Future’ live town halls around the country focusing on important local issues including gun control, same-sex marriage, the Patient Protection & Affordable Care Act, immigration, public education, and jobs. More than 3,500 members of the public have attended these public service events and countless more have participated live using social media. These town hall telecasts have received widespread praise and have been recognized with Awards for Excellence by New York State Broadcasters and Maine Association of Broadcasters and have been awarded an Emmy and an Associated Press award. In addition, our stations have created public and community service segments within the local news to discuss and educate the viewer on important topics.

“All told, we currently produce more than 1,055 hours of local news every single week and the inaccurate comments of Free Press are an affront to the almost 5,600 hardworking and dedicated professionals that work for Sinclair. Our news employees have dedicated their careers to providing the public with vital news and information and serving as government watchdogs on their behalf. We could not be prouder of their outstanding efforts, often in the face of very difficult circumstances involving natural disasters and other dangerous situations. While Free Press chooses to ignore the facts, those with a less biased and more informed nature have instead lauded these efforts. For 2012 alone, stations which we own or provide news programming to won 27 Emmy Awards, 93 Associated Press / State Broadcaster Awards, 14 other acclaimed awards, including 3 Murrows; for outstanding journalism, best investigative reporting, and excellence in news coverage, among other news related assignments.

“It is unfortunate and ironic that so-called ‘media watch dog groups,’ such as Free Press, would flaunt the First Amendment to spew unsubstantiated attacks on those who are truly serving the public’s interest. When an organization, such as Free Press, uses a 1945 quote regarding promoting diverse viewpoints to chide and insult the Federal Communications Commission’s ethics and intelligence, without recognizing the changes in the dissemination of information that have occurred in the last almost 70 years, then that should be a red flag that the organization is not working in the public’s best interest and is simply disconnected to the real world and its multiple voices found in newspapers, cable networks, radio, outdoor, television and the Internet. Their own comments demonstrate that the issue is not one of too few voices, but rather that not everyone who uses the press to promote their own agenda is credible.”

About Sinclair Broadcast Group, Inc.:

On a pro forma basis assuming consummation of all previously announced acquisitions, Sinclair Broadcast Group, Inc., the largest and one of the most diversified television broadcasting companies in the U.S., will own and operate, program or provide sales services to 162 television stations in 77 markets. Sinclair's television group will reach approximately 38.7% (24.3% for

purposes of the 39% FCC ownership cap) of U.S. television households and will be affiliated with all major networks. Sinclair owns equity interests in various non-broadcast related companies. The Company regularly uses its website as a key source of Company information which can be accessed at www.sbgj.net.

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BARRY M. FABER
Executive Vice President/General Counsel
Direct Dial (410) 568-1524
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August 8, 2013

VIA E-MAIL

Mr. Craig Aaron
President & CEO
Free Press
1025 Connecticut Avenue, NW
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Washington, DC 20036

Dear Mr. Aaron,

I recently read your public response to Sinclair's announced transaction with Allbritton Communications. Although I understand and appreciate the stated roles of organizations like Free Press as advocates for the public interest through the promotion of vibrant, quality journalism, I am writing to provide you with my own thoughts on the issues raised in your comments.

First, Sinclair does not take a "cookie cutter" approach to our news business. On the contrary, we take pride in delivering locally generated content with a focus on serving as an advocate for the viewers of our stations. Our emphasis on accountability through investigative journalism has led us to increase newsroom positions, news hours and budgets for our acquired stations. In Austin, for example, we recently increased KEYE TV's news operations by adding morning and 5PM newscasts and are now delivering local content that did not exist prior to Sinclair's acquisition of this station. In West Palm Beach, we just added 9 newsroom positions to enable the generation of quality local journalism like Waste Watch, an initiative to investigate and report on how our viewers' local tax dollars are being spent. Outside of the news arena, we have substantially increased our production of local sports programming in multiple markets through our Thursday Night Lights initiatives to highlight local athletes and high school teams. These are just a few of the numerous examples of Sinclair's focus on adding relevant, meaningful content, hiring local employees, and expanding and upgrading news operations.

Second, while I understand that you disagree with the FCC's treatment of television shared service agreements, I feel that it is unfair to paint Sinclair as a bad actor for simply abiding by the current regulatory structure consistent with the practice of many other television broadcasters. Joint sales agreements and shared service agreements often promote diversity by

enabling smaller stations to stay on the air or provide better programming where they otherwise could not. In some markets, cost savings resulting from these transaction structures have supported the provision of local news programming by stations, thereby furthering the public interest. While I don't necessarily expect to sway your views on this subject, I would instead suggest that a response to the FCC's invitations for comments to Notices of Proposed Rule Making would be a more appropriate and constructive venue for your assertions.

I hope this information is helpful. If you would be interested in further discussing the topic, please let me know.

Sincerely yours,

 /S/

Barry M. Faber
Executive Vice President/General Counsel

BMF:emw

CERTIFICATE OF SERVICE

I, Julia Colish, a secretary with the law firm of Pillsbury Winthrop Shaw Pittman LLP, hereby certify that copies of the foregoing "**Submission for the Record**" were served via U.S. mail on this 5th day of November 2013 to the following:

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