

June 12, 2014

The Honorable Thomas Wheeler
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman Wheeler:

Although the nature of news media is rapidly changing, a robust and vital local broadcast news industry remains critically important to our constituents. Local newscasts are a key source of daily information to citizens of our states, especially in smaller or more rural markets and particularly in times of emergency. Unfortunately, market pressures in the broadcasting industry are making it harder for smaller stations to survive. If regional stations go dark, our constituents will be the ultimate losers.

We are concerned, therefore, that the Federal Communications Commission's recently promulgated rules with respect to Joint Sales Agreements will further undermine the ability of local broadcasters to serve their communities. While we appreciate your desire to promote competition in the marketplace, the new rules are interrupting established business practice and creating substantial uncertainty in the broadcasting market. Ultimately, we fear the result will be less competition since certain broadcasters may be forced to cease operations, which would harm not only the broadcasters themselves but also the viewers they serve.

Specifically, as a result of the FCC's decision to count JSAs between television stations as ownership interests, many existing agreements will have to be unwound unless specific waivers are granted. These existing agreements were consistent with the law and rules at the time they were executed, and business plans have been built around them. Forcing the broadcasters to rely on the speculative possibility of a waiver creates substantial business challenges.

In addition to the business uncertainty the new rules create with respect to existing agreements, we are concerned that the new JSA rules going forward will unnecessarily foreclose many agreements that have resulted in improved local service and a more robust broadcast industry. This is especially true in smaller markets where stations may, absent a JSA, struggle to generate sufficient advertising revenue to support the production of locally oriented programming.

Finally, we are disturbed by reports that new processing guidelines looking at JSAs and other sharing arrangements have caused applications for broadcast station transfers to be stalled at the FCC. These delays create further market uncertainty and challenges.

Fortunately, we believe the Commission can successfully address these concerns within the framework of the existing rules. Accordingly, we urge the Commission to adopt a waiver policy that does not penalize JSAs that were structured and executed prior to the issuance of the new

rules. In addition, the Commission's waiver policy going forward should favorably regard, for example, JSAs that promote more or better local news, public affairs and emergency information, diverse programming such as foreign language and expanded ownership opportunities for minorities and women in broadcasting. Finally, we hope the Commission will take swift action on pending television station transactions in the very near future.

Thank you for consideration of these issues.

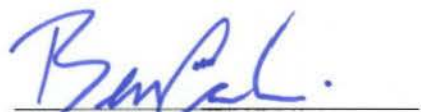
Sincerely,



Charles E. Schumer
United States Senator



Barbara A. Mikulski
United States Senator



Benjamin L. Cardin
United States Senator



Robert P. Casey Jr.
United States Senator



Kirsten E. Gillibrand
United States Senator