

**Comments of the Mid-Atlantic Community Papers Association
to President-Elect Obama's FCC Transition Team Co-Leaders
on Group Conference Call, Monday, December 22, 2008**

As a former publisher and panelist at the Media Ownership Hearing in Harrisburg, PA, I appreciate the opportunity to share the priorities of the Mid-Atlantic Community Papers Association for the next Federal Communications Commission. Our concerns are echoed by over a dozen state, regional and both national trade associations of publishers of truly local, free weekly community papers serving the news, information and advertising needs of Main Street America.

Our publishers are opposed to Newspaper-Broadcast Cross-ownership. We testified at all public hearings and filed comments detailing our opposition in the last Rulemaking process. Preserving safeguards against Cross-ownership will help preserve localism -- and what's left of truly local media ecosystems.

Unlike the abstractions rendered by Nielsen's arbitrary and proprietary model -- the DMA -- our communities are real places. They have unique populations, with local concerns and local commerce. Please note:

- 99% of local communities don't have competing dailies -- that paper is already a monopoly -- and the overwhelming odds are that it's not locally owned.

- Cross-ownership is last frontier of media consolidation -- since broadcast and print companies have already crushed or swallowed most inter-media rivals at the community level.

Cross-ownership is about only one thing: Walmartizing the fragile local media ecosystem -- it will either starve what remains -- or force our independent peers to merge for survival.

Critical news and voices will be lost -- and so will cost-effective advertising resources for the Merchants on Main Street, themselves battling National Chains.

We offer the following concrete steps to stop Newspaper-Broadcast Cross-ownership:

- Follow up on the House Commerce Subcommittee Report -- if there were gross violations of the Administrative Procedures Act during the latest Media Ownership Review, rescind the Rules administratively.

- Eliminate the FCC's "Footnote 25 Policy" -- which has been successfully exploited by Tribune, Gannett, Media General and others to form otherwise illegal Cross-combinations.

- Should the new Cross-ownership Rules survive the 3rd Circuit Court -- Do not start Cross-Combo Merger Reviews with the Presumption that such consolidation is in the Public Interest.

- Get Better Data: Collaborate with the SBA, Commerce, Labor, DOJ, FTC, Census, etc. -- to build a robust, Micro-Level view of the rich tapestry of our fragile local media ecosystems. And move away from the over-reliance on the ready-made, proprietary Macro-Data, otherwise created and sold for the purposes of the Industry it regulates.

Respectfully,
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