

FCC Form 314 Amendment
WGN-TV Chicago, IL
WGN(AM) Chicago, IL
March 2012

AMENDMENT TO EXHIBIT 16

I. INTRODUCTION AND SUMMARY

On April 28, 2010, certain subsidiaries of the Tribune Company (“Tribune”) filed FCC applications seeking approval of the assignment of licenses in connection with Tribune’s anticipated emergence from bankruptcy as a reorganized entity (the reorganized Tribune Company is hereinafter referred to as “Reorganized Tribune,” and the applicants as the “Reorganized Licensees”). Five of those applications, including the instant application, requested waivers of the newspaper/broadcast cross-ownership rule (“NBCO Rule”) to permit the continued common ownership of newspaper and broadcast combinations held by Tribune (the “Initial Waiver Requests”).¹ The purpose of this amendment is to address the Third Circuit’s decision in *Prometheus Radio Project v. FCC* (“*Prometheus II*”)² and the FCC’s Notice of Proposed Rulemaking in its 2010 Quadrennial Review (“*2011 NPRM*”),³ both of which were

¹ Reorganized Licensees are seeking waivers of the NBCO Rule for the following combinations: (1) WGN-TV, WGN(AM), and the *Chicago Tribune* (FCC File No. BALCDT-20100428AEL); (2) KTLA(TV) and the *Los Angeles Times* (FCC File No. BALCDT-20100428ADV); (3) WSFL-TV and the *Sun Sentinel* (FCC File No. BALCDT-20100428ADY); (4) WTIC-TV, WCCT-TV (formerly WTXN(TV)), and the *Hartford Courant* (FCC File Nos. BALCDT-20100428ADQ, BALCDT 20100428ADX); and (5) WPIX(TV) and the *New York Daily News* (FCC File No. BALCDT-20100428ADP).

² 652 F.3d 431 (3d Cir. 2011) (“*Prometheus II*”), *reh’g denied*, Order (3d Cir. Sept. 6, 2011). Multiple petitions for writ of *certiorari*, including one in which Tribune joined, were filed in late 2011, have been opposed, and remain pending. *See Tribune Co., et al. v. FCC, et al.*, No. 11-696 (filed Dec. 5, 2011); *see also Media General, Inc. v. FCC, et al.*, No. 11-691 (filed Dec. 5, 2011); *Nat’l Ass’n of Broad. v. FCC, et al.*, No. 11-698 (filed Dec. 5, 2011).

³ 2010 Quadrennial Regulatory Review—Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996; *Promoting Diversification of Ownership in the Broadcasting Services*, Notice of Proposed Rulemaking, FCC 11-186, MB Docket Nos. 09-182, 07-294 (rel. Dec. 22, 2011) (“*2011 NPRM*”).

issued after the Initial Waiver Requests were filed, and to provide updated information in support of the requested waivers.⁴

As discussed further below, the Third Circuit in *Prometheus II* vacated the revised standards for waivers of the NBCO Rule that the FCC adopted in 2008 on the ground that those standards had not been subject to sufficient notice and comment under the Administrative Procedure Act (“APA”).⁵ In the *2011 NPRM*, however, the FCC has stated that it “continue[s] to believe . . . that a blanket prohibition on newspaper/broadcast combinations is overly broad and does not allow for certain cross-ownerships that may carry public interest benefits” and has tentatively concluded that it should replace the absolute ban on cross-ownership with a presumptive waiver standard that would generally incorporate most elements of the 2008 rule.⁶

In its Initial Waiver Request, the Reorganized Licensee demonstrated that the grant of a permanent waiver of the NBCO Rule would have been appropriate under the modified waiver standards that were adopted by the FCC in 2008, and is also appropriate under the standards that the FCC had applied to such requests since the NBCO Rule’s inception in 1975.⁷ The Reorganized Licensee also demonstrated that, in the alternative, a temporary waiver of the NBCO Rule until 18 months after completion of pending proceedings to revise the NBCO Rule

⁴ The applications are concurrently being amended to reflect additional developments that have occurred since their initial filing, including the submission of a Third Amended Plan of Reorganization to the Bankruptcy Court.

⁵ *Prometheus II*, 652 F.3d at 449-54.

⁶ *2011 NPRM*, ¶¶ 89-90, 101-102.

⁷ See Initial Waiver Request Section IV.

is warranted.⁸ The Reorganized Licensee further explained that the grant of a waiver of the NBCO Rule is required under the APA and the Constitution, as well as the FCC's settled policy of affording comity to the bankruptcy process.⁹

In support of its Waiver Request, the Reorganized Licensee presented extensive showings concerning the extremely high level of public service that the co-owned properties have long provided to the market that they serve and established that the grant of a NBCO Rule waiver is necessary to allow these benefits to continue.¹⁰ The Reorganized Licensee emphasized that the grant of a waiver would simply preserve the *status quo* with respect to this existing combination, and as a result would, by definition, have no impact on existing levels of competition in the local market.¹¹ In addition, the Reorganized Licensee established that the market served by the newspaper/broadcast combination is in any event remarkably diverse and competitive—both in terms of traditional media outlets and additional new media such as Internet sources—and that allowing continued common ownership would thus have no adverse impact on competition.¹² To the contrary, the Reorganized Licensee showed that failure to grant the requested relief would have adverse public interest effects.¹³

⁸ See *id.* Section V.

⁹ See *id.* Sections III.D-E.

¹⁰ See *id.* Section III.A.

¹¹ See *id.* Sections III.E.3, IV.

¹² See *id.* Section III.B.

¹³ See *id.* Section III.C.

As explained below, the Reorganized Licensee is entitled to a permanent waiver of the NBCO Rule. In the period since the filing of the Initial Waiver Request, the marketplace has only become more competitive, while newspapers and broadcast stations have continued to face increasingly severe economic challenges. Furthermore, the properties have continued to deliver consistently outstanding and diverse local public service benefits that would not be possible absent common ownership. And, as Tribune's bankruptcy proceedings have now extended for more than three years, the interest in comity has taken on added significance.

Accordingly, under any reasonable waiver standard, the Reorganized Licensee is entitled to a permanent waiver of the NBCO Rule that would allow continued common ownership by the Reorganized Licensee, as well as subsequent sale of the properties in tandem. At the very least, the FCC should grant the Reorganized Licensee a temporary waiver until 18 months after the Commission completes its review of the NBCO Rule and that action becomes a final order no longer subject to judicial review.

II. THE NEWSPAPER AND BROADCASTING INDUSTRIES CONTINUE TO FACE SEVERE ECONOMIC CHALLENGES AND CONSTANTLY INCREASING COMPETITION.

In its Initial Waiver Request, the Reorganized Licensee demonstrated the unprecedented negative effects that the recent economic crisis has had on the newspaper and broadcasting industries, including Tribune's resultant filing for bankruptcy protection in December of 2008.¹⁴ The Initial Waiver Request also documented the substantial and ever growing competition that

¹⁴ See *id.* Section II.C.

traditional media, including the commonly owned outlets, face in the contemporary information marketplace.¹⁵ Since the filing of the Initial Waiver Request, the marketplace has only become more competitive, and the newspaper and broadcasting industries have continued to face severe economic challenges.

Indeed, in the *2011 NPRM*, the Commission recognizes that “[t]he proliferation of broadband Internet and other new technologies has had a dramatic impact on the media marketplace,” and that “[c]onsumers are increasingly turning to online and mobile platforms to access news content and audio and video programming.”¹⁶ Moreover, in June 2011, the FCC’s Future of Media Working Group, led by former journalist Steve Waldman, released a comprehensive report that not only provides a detailed analysis of the current media landscape and examines how media is serving the information needs of citizens, but also reaffirms the troubling economic trends faced by newspapers and broadcasters.¹⁷ As the FCC explains in the *2011 NPRM*, the Working Group’s *Report* “finds that the Internet has created more diversity and

¹⁵ See *id.* Section III.B.

¹⁶ *2011 NPRM*, ¶ 1; see also, e.g., *id.* ¶ 15 (“As a result of the growing availability of the Internet and the proliferation of wireless technology, consumers are accessing news and public affairs programming through their computers and electronic devices.”); *id.* at ¶ 133 (citing *2010 Quadrennial Regulatory Review—Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, Notice of Inquiry, 25 FCC Rcd 6086, 6088 ¶ 6 (2010) (citing Kristen Purcell, *et al.*, Pew Research Center’s Project for Excellence in Journalism, *Understanding the Participatory News Consumer: How Internet and Cell Phone Users Have Turned News Into a Social Experience* (2010), available at http://www.journalism.org/sites/journalism.org/files/Participatory_News_Consumer.pdf (last visited Mar. 15, 2012))).

¹⁷ Steve Waldman & the Working Group on Information Needs of Communities, *The Information Needs of Communities: The Changing Media Landscape in a Broadband Age* (June 2011) (“*Future of Media Report*” or “*Report*”), available at http://transition.fcc.gov/osp/inc-report/The_Information_Needs_of_Communities.pdf (last visited Mar. 15, 2012).

choice in news and information, and that most communities have seen a rise in the number and diversity of outlets, as well as more diversity in commentary and analysis.”¹⁸

Further, the *2011 NPRM* recognizes that “the growth of these new technologies both challenges established business models and provides opportunities to reach new audiences and generate new revenue streams,” resulting in a situation in which “[b]roadcast and newspaper consumption in traditional forms is in decline, and advertising revenues have been shrinking in recent years.”¹⁹ Similarly, the *Future of Media Report* observes that “[a]s technology offered consumers new choices, it upended traditional news industry business models, resulting in massive job losses—including roughly 13,400 newspaper newsroom positions in just the past four years.”²⁰ The *Report* confirms that the newspaper industry faces a broad array of challenges in an information marketplace that is increasingly dominated by the Internet, accurately depicting—at best—a bleak picture of the current state of the newspaper industry:

Newspapers across the country have experienced severe cutbacks during the past decade, which has undermined their ability to perform their role as the nation’s watchdog. Ad revenue dropped nearly 48 percent between 2005 and 2010, and with it the industry’s annual spending on reporting and editing capacity dropped by \$1.6 billion, from 2006 to 2009, a reduction of more than 25 percent. . . . The number of full-time journalists at daily newspapers fell from a peak of about 56,900 in 1989 to 41,600 in 2010, a level not seen since before the Watergate era.²¹

¹⁸ *2011 NPRM*, ¶ 133 (citing *Report* at 119-20).

¹⁹ *Id.* at ¶ 3.

²⁰ *Future of Media Report* at 5.

²¹ *Id.* at 34 (citations omitted).

The Internet has dramatically undercut newspaper revenues, contributing in large part to the newspaper industry's economic woes—in 2000, newspaper print advertising revenue totaled \$48.7 billion, but ten years later it plummeted more than 50% to \$22.8 billion.²² Although newspapers have gained audience on the Internet, their online advertising revenue has not even come close to making up the loss in advertising dollars from print editions.²³

As detailed in the Initial Waiver Request, the sharp drop in newspaper advertising revenue resulted in cutbacks in operations—numerous newspapers stopped publishing print editions, some switched to online-only editions, and many ceased to exist in any form.²⁴ The

²² *Id.* at 39 (citation omitted); *see also id.* at 128 (observing that “in 2010, advertisers spent more money online than in print newspapers”); *Inside Radio News Ticker...Newspaper Spending Falls Again*, INSIDE RADIO (Sept. 2, 2011) (“Advertisers spent less on print for the 20th consecutive quarter dating back to 2006, and fresh Newspaper Association of America data shows no sign of a reversal of fortune. Despite an 8% gain in digital dollars, NAA says overall newspaper revenue fell 7% during second quarter.”).

²³ *Future of Media Report* at 39 (“Online ad revenue for the entire newspaper industry grew by a billion between 2005 and 2010. But print advertising lost \$24.6 billion. This led to the saying in the newspaper world that ‘print dollars were being replaced by digital dimes.’ That turns out to be a rather cheerful way of phrasing it. More accurately: each print dollar was being replaced by four digital pennies.”). The *Future of Media Report* notes that classified advertising was “hit the hardest, as consumers and advertisers found themselves with an array of much cheaper, faster, and more efficient alternatives,” including popular online alternatives such as Craigslist, Google, and numerous specialty websites for posting information on jobs, cars, and real estate. *Id.* at 39-40. Between 2000 and 2010, newspapers’ revenue from advertisements for employment, real estate, vehicles, and smaller items and services fell an astonishing 71 percent from \$19.6 billion (when it accounted for 40 percent of newspapers’ total print advertising revenue) to \$5.6 billion (amounting to just 25 percent of newspapers’ total print advertising revenue). *Id.* (citation omitted). Significant declines in national and retail advertising dealt newspapers a “double whammy”—“just as classified advertisers migrated to the Internet, national advertisers cut spending and shifted some resources to other media, including cable television, niche publications, and the Internet.” *Id.* at 40 (citation omitted). In 2010, newspapers’ national advertising revenues were \$4.2 billion, down from a high of \$8 billion in 2004, while newspapers’ retail advertising revenues were \$12.9 billion, down from a high of \$22 billion in 2005. *Id.* at 39-40 (citation omitted).

²⁴ *See* Initial Waiver Request Section II.C.

Future of Media Report confirms these trends.²⁵ The *2011 NPRM* and the *Report* similarly corroborate that staffing cutbacks have been widespread; the *2011 NPRM* recognizes that “[s]ome broadcast and newspaper outlets have contracted the size of news staffs in response” to the proliferation of new media outlets,²⁶ and the *Report* concludes that “[t]he loss of revenue precipitated a more than 25 percent reduction in newsroom staffs, affecting reporters, editors, online producers, photographers, artists, and videographers.”²⁷ The *Future of Media Report* concludes that these dramatic cutbacks “appear to have caused genuine harm to American citizens and local communities,” as fewer newsrooms can afford to work on labor-intensive, investigative stories and newspapers have had to eliminate or reduce coverage of important areas such as state government, municipal government, crime and criminal justice, health, and education.²⁸ As shown in the Initial Waiver Request and in Section III, *infra*, however, Tribune has continued to invest in newsroom operations and provide such coverage despite its economic difficulties.

The *2011 NPRM* and the *Future of Media Report* also confirm, as demonstrated in the Initial Waiver Request,²⁹ that the television broadcast industry faces similar challenges from

²⁵ *Future of Media Report* at 40-41 (providing a comprehensive list of newspapers that have closed or eliminated a newsprint edition between 2007 and 2010); *see also id.* at 42 (“In 2009 alone, the website Paper Cuts counted 34 papers that had laid off more than 100 employees each. Meanwhile, journalists across the country who managed to hang onto their jobs often were forced to accept unpaid furloughs, pay cuts, or both.”) (citations omitted).

²⁶ *2011 NPRM*, ¶ 3.

²⁷ *Future of Media Report* at 40 (citation omitted).

²⁸ *Id.* at 44-55, 57.

²⁹ *See* Initial Waiver Request Sections II.C., III.B.

cable, satellite, and other MVPDs as well as the rapidly increasing availability of competitive video content via the Internet. The *2011 NPRM* acknowledges increases in subscribership reported by satellite television companies, as well as the widespread availability of online video content.³⁰ Similarly, according to the *Report*, the television broadcast industry has been suffering economic declines as “[t]he broadcast audience continue[s] its drift to cable, satellite, and the Internet.”³¹ In particular, “[t]he economic changes from 2005 to 2008 hit local news-producing stations especially hard.”³² Citing statistics from the National Association of Broadcasters, the *Report* indicates that local television news pre-tax profits dropped 56.3% between 1998 and 2008.³³ Further, local television stations have had to make staffing cuts or undertake other cost-saving measures, even where they are producing more newscasts and news content; nearly two-thirds of local television news directors reported staff cuts in 2009, and the median full-time staff of stations dropped from 32 in 2006 to 29 in 2009.³⁴

³⁰ *2011 NPRM*, ¶ 2.

³¹ *Future of Media Report* at 73 (providing chart which shows that, in 2010-2011, ad-supported cable had a 60 percent household primetime share level as compared to 36 percent for television broadcasters); *see also id.* at 102 (stating that “the audience is shifting away from broadcast television to cable and the Internet, both of which are drawing off viewers and advertisers”).

³² *Id.* at 74.

³³ *Id.* (citation omitted).

³⁴ *Id.* at 79 (citations omitted). The *Report* also concludes that television revenues rose in 2010 and that “the economic prospects for local broadcast stations and their news operations remain brighter than the outlook for local newspapers.” *Id.* at 74. However, television revenues still have not returned to their pre-downturn levels and are unlikely to do so given the ever-expanding competition for advertising dollars from the Internet and other new media.

These trends can only be expected to continue, and, even if the industry were to make a dramatic recovery, broadcast television would still face vibrant competition for viewers and advertising dollars from cable and satellite television and the Internet. Indeed, the *Report* indicates that the number of cable subscribers has increased steadily since its inception, with 62 million subscribers in 2009, and direct broadcast satellite (DBS) has also become a “significant provider of video services,” with DirecTV serving 19.2 million subscribers and DISH Network serving 14.3 million subscribers.³⁵ Moreover, “as IPTV (Internet TV) becomes a more common form of TV watching, local TV stations may suffer, too,” as “the higher ad rates charged on traditional media will likely be undercut by the lower ad rates on the Internet.”³⁶

Further, the *2011 NPRM* and the *Future of Media Report* confirm, as demonstrated in the Initial Waiver Request,³⁷ that the radio broadcast industry faces competitive pressures from a variety of sources, including satellite-delivered and online audio content. Although the radio industry has generally fared better than the newspaper and television broadcast industry, the *Future of Media Report* observes that “radio revenues declined in 2008 and 2009 due to the recession.”³⁸ Broadcast radio faces competition from satellite radio, which saw its subscriptions grow 7.5% to 20 million and its revenue rise 12% to \$2.8 billion in 2010, as well as Internet radio, which is predicted to have its revenue increase from \$552 million in 2010 to \$1 billion in

³⁵ *Id.* at 109, 114 (citations omitted).

³⁶ *Id.* at 270.

³⁷ See Initial Waiver Request Sections II.C., III.B.

³⁸ *Future of Media Report* at 61.

2015.³⁹ With respect to local advertising, broadcast radio is increasingly competing with online radio, which “can place ads on websites that target local listeners without necessarily offering local content”—a development that the *Report* finds “may be good for local businesses but could harm the business models of local radio.”⁴⁰ Indeed, based on many of these factors, the *2011 NPRM* expressly requests comment on whether it should *eliminate* restrictions on newspaper/radio combinations entirely, and acknowledges, consistent with the Commission’s previous findings, that “radio stations are not the primary outlets that contribute to local viewpoint diversity.”⁴¹

As highlighted above and in the Initial Waiver Request,⁴² the Internet is vying with traditional media sources for consumers and advertising. As the number of Americans with Internet access (and high-speed Internet access in particular) rises, the importance of the Internet as a source of news and information is also growing. A recent study by the Pew Research Center and the Knight Foundation found that: “The [I]nternet has already surpassed newspapers as a source Americans turn to for national and international news. The findings from this survey now show its emerging role as a source for local news and information as well.”⁴³ The fact that more

³⁹ *Id.* at 68, 70 (citations omitted); *see 2011 NPRM*, ¶ 1 (noting that satellite radio companies have reported increases in subscribership).

⁴⁰ *Future of Media Report* at 69.

⁴¹ *2011 NPRM*, ¶ 112.

⁴² *See* Initial Waiver Request Sections II.C., III.B.

⁴³ Pew Project for Excellence in Journalism, Pew Internet & American Life Project & Knight Foundation, *How People Learn About Their Local Community* (Sept. 2011) at 22, *available at* http://www.knightfoundation.org/media/uploads/publication_pdfs/Pew_Knight_Local_News_Report_FINAL.pdf (last visited Mar. 15, 2012) (“Pew

people are turning to the Internet for local topics “poses a major challenge to more traditional news providers, especially newspapers, which have often aspired to be a relatively comprehensive source of information on all of these topics.”⁴⁴ Although the survey found that newspapers are one of the most relied upon sources for a wide range of local topics, it found that 69% of Americans believe that the death of their local newspaper would have *no impact or a minor impact* on their ability to get local information.⁴⁵ Similarly, another study—this one conducted by Arbitron and Edison Research—found that a mere 5% of respondents believe that newspapers are the “most essential” media, as compared to 42% who stated that the Internet is “most essential” to their lives.⁴⁶ And nearly half of the respondents in the Pew/Knight Foundation survey indicated that they expect newspapers to *disappear* in the future due to the Internet.⁴⁷

The rise of the Internet and the increasing adoption of broadband are likely only to continue to diminish the position of traditional media. As the *Future of Media Report* observes,

Community Information Study”); see also *id.* at 22 (noting that the Internet is either the most popular source or tied with newspapers as the most popular source among all adults for five of the 16 local topics covered by the survey, and that the Internet is an even more significant source for local news and information among the 79 percent of Americans who are online).

⁴⁴ *Id.*

⁴⁵ *Id.* at 14 (also noting that 75% of younger adults (age 18-29) and 74% of home broadband users say their ability to get local information would not be affected in a major way by the absence of their local paper).

⁴⁶ Arbitron Inc. & Edison Research, *The Infinite Dial 2010: Digital Platforms and the Future of Radio* 11, 14 (2010), available for download at http://www.arbitron.com/study/digital_radio_study.asp (last visited Mar. 15, 2012). This study also found that the Internet is now just as important as television across all respondents, and that for younger consumers the Internet is more important than television. *Id.* at 12-13.

⁴⁷ *Pew Community Information Study* at 14.

“[a]lthough increased broadband penetration has tremendous benefits it will also create further dislocation for traditional media business models in the short run,” as broadband eventually will reach the 22 percent of Americans who are not Internet users (as well as the 35 percent who do not use broadband Internet at home) and who, thus, currently rely on traditional media sources.⁴⁸ Indeed, the Commission itself has found that “[m]any Americans now turn to the Internet to obtain news,” and that “the Internet has become a *major source* of news and information, which forms the basis for informed civic discourse.”⁴⁹ At the same time, these developments should not be viewed as a sign that newspapers should simply be permitted to die a slow death. To the contrary, newspapers are an important part of the “rich[] and . . . nuanced ecosystem of community news and information”⁵⁰ on which people rely and traditional media, including newspapers, remain most often the sources of breaking news stories,⁵¹ which renders the requested waiver all the more appropriate.

⁴⁸ *Future of Media Report* at 269 (citing Gordon Crovitz, former publisher of *The Wall Street Journal*, who says his research over the years “has shown an ‘inverse correlation between broadband penetration and newspaper profitability’”).

⁴⁹ *Preserving the Open Internet; Broadband Industry Practices*, Report and Order, 25 FCC Rcd 17,905, 17,912 (¶ 15) (2010) (emphasis added).

⁵⁰ *Pew Community Information Study* at 1; *see id.* at 16 (noting important “implications about what could happen if a newspaper in town were to disappear” because people turn to newspapers for information that they are not able to get from other sources).

⁵¹ *See, e.g.,* Pew Project for Excellence in Journalism, *How News Happens: A Study of the News Ecosystem of One American City* (Jan. 2010) at 2, *available at* http://www.journalism.org/analysis_report/how_news_happens (last visited Mar. 15, 2012) (finding that “of the stories” available from a variety of news sources in Baltimore, Maryland during a sample week, 95 percent of those that contained “new” information “came from traditional media—most of them newspapers”).

III. TRIBUNE'S CONTINUED OWNERSHIP OF THE CHICAGO PROPERTIES WILL SERVE THE PUBLIC INTEREST.

Over the more than 60 years of Tribune's common ownership of WGN-TV, WGN(AM), and the *Chicago Tribune*, these properties have provided myriad public interest benefits to residents of the Chicago DMA. As demonstrated in the Initial Waiver Request and as expanded upon below, joint efforts between these media properties – and Tribune's local cable news channel, CLTV – have measurably improved each one's ability to deliver in-depth coverage of news events and to contribute to the community's awareness and understanding of important local, national, and international issues.⁵² Through their common ownership with the *Chicago Tribune*, WGN-TV, and WGN(AM) provide programming and local public interest benefits that no television station, radio station, or newspaper on its own could otherwise offer. These benefits flow directly to the public, and would have been difficult if not impossible to attain absent common ownership and Tribune's steadfast commitment to bringing news and public affairs programming benefits to the public.

Facilities, Operations, and Employees. The manner in which the facilities, operations, and employees of Tribune's Chicago properties are organized facilitates the provision of the benefits of common ownership to the public without compromising the ultimate editorial independence of each of the properties. WGN-TV, which is a CW affiliate, operates from a studio facility and offices located at 2501 West Bradley Place, approximately six and a half miles from Tribune Tower in downtown Chicago; Tribune Tower houses the *Chicago Tribune's*

⁵² See Initial Waiver Request Section III.A.1.

editorial and administrative staff and the WGN(AM) studios, as well as Tribune's corporate headquarters and other business units. Tribune's local cable news channel, CLTV, as well as the programming, promotions, and technical operations of WGN America (Tribune's national cable and satellite superstation), are also managed from WGN-TV's studios.

To enable easy information exchange among the *Chicago Tribune*, WGN-TV, WGN(AM), and CLTV, Tribune has established data links connecting their facilities, including telephone and fiber links and two-way microwave hops for transmitting both video and audio information. *Chicago Tribune*, WGN-TV, and WGN(AM) also share access to "tips provided by readers, viewers and listeners. In a 2010 example, local residents flooded the "tip line" with reports of financial papers swirling in the air in a suburb northwest of Chicago. An alert newspaper photographer captured video for the Tribune websites, and a report ran in *Chicago Tribune* the next day. Tribune also operates an internal software platform through which its properties nationwide share stories and information that they may use as they see fit.

WGN-TV and CLTV maintain a television studio in *Chicago Tribune*'s newsroom, from which they originate video reports and news interview segments featuring *Chicago Tribune* reporters. These reporters appear on a regular basis during WGN-TV's midday newscasts and daily during the early evening weekday newscasts. In addition, when breaking news warrants, WGN-TV news anchors interview *Chicago Tribune* reporters with experience related to the news development for use in WGN-TV's newscasts throughout the day. WGN(AM) on-air hosts similarly interview *Chicago Tribune* reporters when news breaks in their areas of expertise or when the radio station's talk show hosts are discussing topics which the newspaper has been

covering. In early 2010, WGN(AM) began broadcasting from a new, state-of-the-art news studio facility adjacent to the *Chicago Tribune* newsroom. This close proximity facilitates interaction between journalists from the two news staffs, allowing *Chicago Tribune* reporters to add timeliness and depth to WGN(AM) reports. Using cell phones, “smart phones,” and recording equipment, print reporters in the field provide news reports and information to be used on-air on WGN(AM), supplementing the station’s own reporting. With access to increased resources, WGN(AM) gains more “different looks” at different stories, offering listeners greater in-depth team coverage.

Many *Chicago Tribune* reporters and photographers carry video cameras and make their video available via a dedicated fiber connection to WGN-TV and CLTV, as well as to the websites operated by WGN-TV, WGN(AM), and CLTV. Similarly, WGN-TV’s video is available for use on the separate websites of *Chicago Tribune*, WGN(AM), and CLTV, bringing that footage to as many Chicago residents as possible as quickly as possible. This allows residents of Chicago to access news and information whenever and wherever they want to, and in the manner that best suits their needs and preferences. In the context of breaking news stories, WGN(AM) reporters have used their cell phone cameras to capture video images that have been published to the other properties’ websites. The extensive data connections among Tribune’s Chicago properties allow them to readily share and utilize this content.

Bringing together the resources of its commonly owned properties in the Chicago market, Tribune has established the Chicago Breaking News Center website (www.chicagobreakingnews.com), which provides area residents with the latest breaking news

updates at all times of the day and night and offers a free email alert service to registered users. WGN-TV, WGN(AM), CLTV, and *Chicago Tribune* all contribute information to the Chicago Breaking News Center, which operates from Tribune Tower. The Chicago Breaking News Center allows area residents and end users access to Tribune's combined newsgathering and reporting resources in the market. Each of Tribune's Chicago properties contributes specific stories, content, and links to the website. Then editors from the Chicago Breaking News Center choose which of this information to post to the site. WGN-TV, WGN(AM), and *Chicago Tribune* also use Twitter and Facebook to supply links to top stories around the clock. As an increasing number of people turn to online sources for news, chicagobreakingnews.com gives access to high quality, objective news reports in a timely manner. WGN-TV also "live streams" all its newscasts on the Internet and to mobile devices.

As of the end of Tribune's fiscal year 2011 (December 25, 2011), WGN-TV had 278 full-time and part-time employees, 131 of whom worked in the station's news department; WGN(AM) had 86 full-time and part time employees, five of whom worked on news; and *Chicago Tribune* had 1,654 full-time and part-time employees, 463 of whom worked on news and editorial content. Despite the current recession's extraordinary impact on the broadcast industry, Tribune has maintained employment at WGN-TV at a fairly constant level over the last five years and, within the past year, employment has increased at WGN(AM) and *Chicago Tribune*. Although all three properties cooperate to provide the DMA with the best content possible, the stations and the newspaper formally share only those employees involved in reporting on the weather.

News Coverage. As of the filing of the Initial Waiver Request, WGN-TV's local news schedule was as follows:

<i>Program</i>	<i>Time</i>	<i>Days</i>	<i>Hours/day</i>	<i>Hours/week</i>
<i>WGN Morning News</i>	5:00 am – 9:00 am	Monday – Friday	4.0	20
<i>WGN Midday News</i>	11:00 am – 1:00 pm	Monday – Friday	2.0	10.0
<i>WGN Evening News</i>	5:00 pm – 6:00 pm	Monday – Friday	1.0	5.0
<i>WGN News at Nine</i>	9:00 pm – 10:00 pm	Monday – Sunday	1.0	7.0
<i>TOTALS:</i>	<i>Monday – Friday</i>		8.0	42.0
	<i>Saturday – Sunday</i>		1.0	

In just the two years preceding the filing, WGN-TV had increased the amount of local news it broadcast by 10 hours per week; bringing the total to 42 hours of local weekly newscasts.⁵³ Specifically, on September 15, 2008, WGN-TV had launched a half-hour weekday early evening newscast, *WGN Evening News*, and added a half hour per weekday to the *WGN Midday News*. On October 5, 2009, the station added another half-hour to the *WGN Midday News* and another half-hour to the *WGN Evening News*, bringing the total to 42 hours of local newscasts weekly, more than any other station in the market. This news programming distinguishes WGN-TV from other CW affiliates, the majority of which do not originate their own local newscasts.

⁵³ See Hours and Audience Ratings of Local News – Chicago, IL DMA (Attachment 1 to Initial Waiver Request). WGN-TV's news total there was current as of April 2010.

Since submitting the Initial Waiver Request, WGN-TV has made several changes, resulting in seven more hours of local news on the station, for a total of 49 hours per week , which remains the largest amount of weekly local news broadcast by any television station in the market. These changes have included starting the weekday morning newscast one hour earlier at 4:00 am and adding a one-hour weekend morning newscast from 6:00 am - 7:00 am on Saturday and Sunday. As a result of these changes the station's current local news schedule is as follows:

<i>Program</i>	<i>Time</i>	<i>Days</i>	<i>Hours/day</i>	<i>Hours/week</i>
<i>WGN Morning News</i>	4:00 am - 9:00 am	Monday - Friday	5.0	25.0
<i>WGN Weekend Morning News</i>	6:00 am - 7:00 am	Saturday – Sunday	1.0	2.0
<i>WGN Midday News</i>	11:00 am - 1:00 pm	Monday - Friday	2.0	10.0
<i>WGN Evening News</i>	5:00 pm - 6:00 pm	Monday - Friday	1.0	5.0
<i>WGN News at Nine</i>	9:00 pm - 10:00 pm	Monday - Sunday	1.0	7.0
<i>TOTALS:</i>		<i>Monday - Friday</i>	9.0	45.0
		<i>Saturday - Sunday</i>	2.0	4.0
		<i>Grand Total</i>		49

In addition to its regularly scheduled newscasts, WGN-TV also broadcasts a half-hour public affairs program each week. This program airs Saturdays at 5:30 am and alternates between two shows – *People to People*, which provides news and commentary on issues of specific concern to Chicago's African-American population, and *Adelante, Chicago*, which provides news and commentary on issues of particular concern to local Hispanic residents.

Access to the combined resources of Tribune has not only helped WGN-TV increase the quantity of news it broadcasts but has allowed the station to deliver a far superior news product

than is the case for many television stations not affiliated with one of the Big-Four networks. *WGN Morning News* continues to be ranked in the top two in the market, ahead of the local and network programming on the NBC, Fox, and CBS O&Os. *WGN Midday News* is ranked second in the market, behind only WLS-TV, the ABC O&O. Although there are only two 9:00 pm newscasts in the market, *WGN News at Nine* is ranked ahead of the competing newscast on WFLD(TV), the Fox O&O. Without the combined resources of all of Tribune's Chicago properties, it is unlikely that WGN-TV would be able to deliver a news product of such high quality and competitiveness.

WGN(AM)'s programming has similarly benefited from the station's common ownership with Tribune's other Chicago media properties. WGN(AM) operates 24 hours a day, seven days a week, in a local news/talk format. The programming is entirely locally produced and does not include any syndicated programming – a true rarity in the radio industry today. During morning drive time (5:00 am to 9:00 am), the newscasts are 5:25 minutes in length at the top of the hour (exclusive of commercials) and feature traffic, weather, and sports updates. At the bottom of the hour, the newscasts are 4:55 minutes in length (exclusive of commercials) and include traffic, weather, and sports updates. The rest of the day, top-of-the-hour news reports are five minutes, and bottom-of-the-hour news reports are three minutes. In addition to the traffic and weather reports heard during newscasts, WGN(AM) airs traffic and weather updates every 15 minutes during morning drive time and the afternoon rush hour. In morning drive, the programming is news- and talk-oriented; during afternoon drive, the station's programming includes extended news updates but is more talk-oriented than during morning drive. During the rest of the day,

regular programming is preempted for breaking local, national, and international news events, as warranted. WGN(AM) competes with news radio station WBBM(AM) and its simulcast on WCFM (FM); other news/talk stations such as WIND(AM), WLS(AM), and the recently launched WIQI (FM); sports/talk stations WMVP(AM) and WSCR(AM); and noncommercial station WBEZ(FM).

During bad weather, WGN(AM) operates the Emergency Closing Center (“ECC”), a service that allows schools, businesses, and organizations to register their facilities in order to have WGN(AM) announce emergency and weather-related closings. The ECC is the only service of its kind in the Chicago area, meaning that *all* other media outlets that report school/business/organization closing information receive this information from WGN(AM)’s ECC. Listeners also can access the WGN(AM) website for a full list of closings that is updated every 15 minutes or register to receive e-mail notification when their selected facility has closed. Some 4,000 schools, businesses, and other facilities utilize WGN(AM)’s ECC service to publicly disseminate their respective closings.

To expand the breadth of the local news coverage provided by WGN-TV, WGN(AM), CLTV, the *Chicago Tribune*, and chicagotribune.com, assignment editors and news managers of each hold daily conference calls in the morning at 8:45 am – and then throughout the day, as needed, to ensure coverage of all breaking news stories. Their assignment editors also share news tips received throughout the day and work together to ensure that news is disseminated in the fastest way possible. These discussions allow the newspaper, the television and radio stations, CLTV, and chicagotribune.com to allocate their resources across the widest number of

developments in the Chicago area and deliver the broadest possible coverage of local news. WGN(AM) producers frequently make use of *Chicago Tribune*'s extensive archives to enhance the station's coverage of local issues. WGN-TV's local reporting also benefits from access to these archives, including the newspaper's photographic archives.

In addition to this collaboration on regular newscasts and daily print coverage, WGN-TV, WGN(AM), CLTV, chicagotribune.com, and *Chicago Tribune* have worked together to produce special and recurring reports on many issues of importance to the community, including the following:

- In 2011, a WGN-TV reporter received a tip on pension fund abuses involving former city employees. The reporter worked together with a *Chicago Tribune* reporter to uncover the history of the excessive payments. In late September 2011, the newspaper and WGN-TV reported the story on the same day, and the newspaper continued with another in-depth piece the next day. This series already has resulted in the introduction of state legislation to curb the pension fund abuse.
- WGN-TV recently broke the story of excessive credit card spending by the mayor of a nearby town. An in-depth piece appeared in the newspaper, and then the newspaper reporter uncovered and shared information with WGN-TV regarding similar expenditures by the city council.
- A *Chicago Tribune* reporter began working on a story on racial profiling by a local county sheriff's office. Then, the reporter and staff from WGN-TV worked together to develop the story and uncover more details.
- On March 20, 2010, reporters at WGN-TV and *Chicago Tribune* worked together on an investigative report exposing the Chicago courts' practice of granting probation to drivers found guilty of driving at speeds in excess of 40 miles per hour over the speed limit rather than placing the infraction on the drivers' records. This report and ensuing publicity led to state legislation to curtail the courts' discretion in employing probation for egregious speeding offenders.

- Also, in March 2010, WGN-TV and *Chicago Tribune* reporters collaborated on a special report on the U.S. Census. The story focused on the importance of the Census to Chicago's Latino community, and WGN-TV's reporter prepared a follow-up story for Tribune's Spanish-language paper, *HOY*.
- On February 22, 2010, WGN-TV and *Chicago Tribune* staff worked together on the "Safe Passage" project, which involved reports focused on safety tips for young people living in crime-prone areas. The stories aired on WGN-TV, ran in the newspaper, and appeared online. The television station and the newspaper also worked together on a similar March 4, 2010 story.
- During the debate leading up to passage of national healthcare legislation, *Chicago Tribune* reporter Rick Pearson frequently contributed news and commentary on the progress of the Congressional initiatives to WGN-TV's newscasts.
- At the end of 2009, a reporter for WGN-TV and a reporter for *Chicago Tribune* collaborated on a report showing that many Chicago area bars are defying a statewide smoking ban. Both reporters shared the byline on the story that ran in the newspaper; WGN-TV aired the story on its newscasts.
- Also at the end of 2009, WGN-TV and *Chicago Tribune* reporters worked on a special report highlighting the physical challenges faced by an Illinois highway safety worker injured in an accident involving an out-of-state driver and his attempts to motivate state officials to seek justice on his behalf.
- At the beginning of 2010, WGN(AM) aired a report about the closing of one of Chicago's last two operating dairies; the piece featured an on-location segment by a *Chicago Tribune* reporter.
- WGN(AM)'s coverage of the advance of the invasive Asian carp species towards Lake Michigan also has been enhanced by the station's access to *Chicago Tribune's* reporting resources. For example, in its on-air reports, WGN(AM) has made use of audio from interviews conducted by *Chicago Tribune* reporters.
- WGN-TV and *Chicago Tribune* have collaborated on a series of stories detailing what happens at the Mexico-U.S. border to allow illegal immigrants to reenter the United States time and time again. Reporters from each property accompanied a planeload of illegal immigrants returned from Chicago to Mexico and documented the activities that brought them back into the U.S. illegally.

- A WGN-TV reporter embedded with a group of Illinois National Guard troops in Iraq filed stories in 2009 regarding the troops' experiences for WGN-TV, WGN(AM), and *Chicago Tribune*.
- WGN(AM) aired on-location reports from *Chicago Tribune* reporters covering pretrial proceedings in the Drew Peterson murder trial in Joliet, Illinois. Although WGN(AM)'s news department lacked sufficient staff to cover the trial in Joliet, its relationship with the *Chicago Tribune* allowed listeners to receive more in-depth coverage of that story.
- All of Tribune's Chicago properties collaborated on a special "Recession Relief" project, which provided analysis, tips, and advice to help Chicago area residents understand and cope with the recent economic downturn. This project involved on-air and online news reports on the television and radio stations and their websites, as well as related in-depth stories published in the *Chicago Tribune*. WGN-TV produced and aired a weeklong series of reports during all its newscasts that informed viewers about how to save money on expenses ranging from travel to clothing to dining and entertainment. WGN(AM) also broadcast on-air segments providing similar information. Each WGN-TV story was timed to coincide with a related story in the *Chicago Tribune*, and supplemental material was included on the WGN(AM), WGN-TV, and *Chicago Tribune* websites.
- In January 2010, WGN-TV and *Chicago Tribune* worked together to prepare and disseminate "Reinvention Week," a week-long series of stories on people making themselves over in the new year. For example, one story focused on people who changed their careers to do something they find more enjoyable, and a second report examined men who underwent plastic surgery to improve their self-image.
- In early December 2009, WGN-TV and the *Chicago Tribune* collaborated on "Holiday Survival Week," a series of stories and interviews on how to reduce stress. WGN-TV featured *Chicago Tribune* writers on-air to report on their newspaper stories. WGN-TV produced two stories: one concerning fun events for families during the holidays and a second regarding how to avoid stress at family functions.
- The week of October 25, 2009, WGN-TV and *Chicago Tribune* teamed up for "Preventive Healthcare Week," a series of stories and interviews designed to educate viewers and readers on health-related issues and preventive medicine. WGN-TV featured *Chicago Tribune* reporters on-camera to discuss their newspaper stories. WGN-TV also produced three unique reports on the best uses

of vitamins and dietary measures to fight the flu, and the benefits of proper exercise.

- *Chicago Tribune* columnist Phil Rosenthal often appears on WGN(AM)'s morning news programming and provides insight into media and entertainment news stories, including changes in on-air personnel at television networks.
- The television station and newspaper also regularly collaborate on a feature called "Prep Athlete of the Month." The members of the sports departments of WGN-TV and *Chicago Tribune* confer on the selection of the athlete, and both then provide coverage after the recipient is chosen. WGN-TV also selects a "Teacher of the Month," whose award is publicized on-air and on the station's website. In addition, WGN-TV's newscasts include a segment titled "Chicago's Very Own," which profiles individuals who are making special contributions to the Chicago community.
- *Chicago Tribune's* food critic reports once a week on WGN-TV and frequently contributes to WGN(AM)'s broadcasts, particularly during the station's morning broadcasts.
- *Chicago Tribune* sports reporters also frequently provide on-air reporting for WGN-TV, including a recurring feature called "Baseball Insider."
- *Chicago Tribune* real estate and business reporters regularly provide reports on WGN(AM)'s morning and midday shows.
- Rick Kogan, a senior writer and columnist for *Chicago Tribune's* Sunday magazine, also hosts "The Sunday Papers," a Sunday morning program on WGN(AM) featuring discussions of the weekend's news and interviews with Chicago newsmakers.
- Michael Phillips, *Chicago Tribune's* chief film critic, and Chris Jones, its theatre critic, contribute to WGN(AM)'s programming once or twice each week by discussing their latest reviews.
- Twice a week, WGN(AM) afternoon host Gary Meier, known for his wit and sarcasm regarding topics of the day, presents the "In the Line of Meier" segment on WGN-TV, and *Chicago Tribune's* editorial cartoonist Scott Stantis occasionally appears on WGN-TV – including a planned appearance on WGN-TV's upcoming election night coverage.

- Chicago Tribune's transportation reporter provides a special report in his area of expertise once a week on WGN-TV.

Tribune's Chicago news organizations have also worked closely together on a number of occasions to deliver improved coverage of breaking news events, including the following examples over the last several years:

- On September 14, 2011, WGN-TV's overnight reporter began working on a breaking story about an attack on a 14-year old boy and provided information to the newspaper for posting on its website. *The Chicago Tribune's* police reporter obtained information on the exact address of the incident and provided that information to WGN-TV. When the newspaper reporter located the father of the boy and interviewed him, the reporter contacted WGN-TV, so the station could get a similar interview.
- On September 2, 2011, a woman, who had earlier been arrested for driving under the influence, was killed on Chicago's Eisenhower Expressway after walking in a marked median area along the inbound lanes. WGN-TV, in working on the story, was able to reach her relatives very quickly and shared that information with the newspaper, so its reporters could follow up as well.
- In August 2011, WGN-TV sent a reporter to the home of a man who had found paper bags filled with at least \$100,000 in his vegetable garden. The reporter shared the information with the Breaking News Center, which posted information from the reporter's interview and updated it that night and the next day. The story was the most popular one on the website during the day.
- In the same month, WGN(AM) afternoon anchor and evening host David Kaplan received a tip that Chicago Cubs general manager Jim Hendry was going to be fired, and the Tribune properties broke the story.
- On April 15, 2010, when a large meteorite appeared as a huge fireball in the night sky over several Midwestern states including Illinois, staff from all three Tribune properties worked together over the next twenty-four hours to cover the developing story for area residents. The Chicago properties first received a tip about the "flash in the sky" by email at 10:30 pm on April 15. chicagobreakingnews.com posted a story about the sighting at 11:54 pm, and WGN(AM) aired the story at midnight. The Breaking News Center continued updating the story throughout the night with information from the National

Weather Service and a WGN-TV reporter. The next morning, WGN(AM) broadcast interviews with a police officer whose dashboard camera caught the event on camera, an astronomy expert, and others; WGN(AM) shared audio of the interviews with the newspaper and website. The newspaper's coverage credited WGN(AM) staff members' contributions in its April 16 edition, as did chicagobreakingnews.com.

- On March 20, 2010, the *Chicago Tribune* provided information to *WGN News at Nine* regarding a forthcoming investigation of Mayor Daley and the Chicago Public Schools.
- On December 23, 2009, WGN-TV editor Pat Curry broke a story about an armed robbery on Chicago's South Side, during which one of the victims wrestled a gun from one of the assailants and then shot and killed him. The story aired first on WGN-TV, continued on both WGN-TV and WGN(AM) throughout the day on December 23, and appeared in the Christmas Eve edition of the *Chicago Tribune*.
- On December 10, 2009, WGN-TV, WGN(AM), and *Chicago Tribune* collaborated to break a story about a high-rise fire on Chicago's Gold Coast that resulted in a fatality. The fire occurred too late in the evening to appear on WGN-TV's late evening news or in the December 11 edition of the *Chicago Tribune*, but reporters from all three outlets cooperated in getting the story online on chicagobreakingnews.com, and both WGN-TV and WGN(AM) reported the story on their early morning newscasts.
- On November 28, 2009, WGN-TV and *Chicago Tribune* together broke a story regarding former NBA star Antoine Walker's ownership of run-down apartment buildings in poor neighborhoods of Chicago.
- In November 2009, WGN-TV and *Chicago Tribune* worked cooperatively to cover the suicide of Chicago's school board president. WGN-TV broke the story and fed it to chicagobreakingnews.com, and the television station and the newspaper cooperated in their ongoing coverage of the story and its aftermath.
- When Chicago Blackhawks forward Patrick Kane was arrested in August 2009 in Buffalo, New York, for allegedly beating a taxi driver there, a WGN(AM) employee who was in Buffalo provided background information and photos that were used by the radio station, WGN-TV and *Chicago Tribune*, allowing them to break this story before other broadcast stations and newspapers in Chicago.

- On August 19, 2009, *Chicago Tribune* reporter Liz Sly was interviewed live from Iraq on WGN(AM) to report on a string of bombings that day which had killed nearly 100 people.
- In July 2009, when a story broke about a scandal at the Burr Oak Cemetery in Alsip, Illinois in which cemetery employees were charged with digging up bodies and re-selling grave sites, a WGN(AM) reporter who was working on the story was able to use additional reporting by the *Chicago Tribune* to enhance the radio station's on-air coverage.
- In February 2008, WGN(AM), WGN-TV, and *Chicago Tribune* reporters worked together to cover a shooting at Northern Illinois University in DeKalb, Illinois, in which six people were killed. Reporters from each covered different aspects of the shooting to deliver a more complete picture of the day's events as they unfolded.

Notwithstanding these collaborative activities, each of Tribune's Chicago properties exercises independent editorial discretion to make its own assignments and cover any story in the manner it sees fit, as each has throughout Tribune's history. That independence is demonstrated by the reciprocal coverage and criticism each presents. The WGN-TV morning news anchors often discuss and compare the front pages and news coverage of *Chicago Tribune* and its rival *Chicago Sun-Times* and point out when the *Sun-Times* has superior coverage of local, regional, or national stories. WGN(AM)'s overnight program hosts also comment on and critique the day's main stories from numerous local newspapers and do not spare *Chicago Tribune*'s coverage from criticism. During a recent scandal involving the University of Illinois admissions department, WGN(AM) commentators criticized the *Chicago Tribune* for the aggressiveness of

the newspaper's coverage, which, the WGN(AM) hosts claimed, did not cease until the paper got the result it wanted – resignation of the school's president.⁵⁴

Political Coverage. Enhanced political coverage is an area in which the sharing of information allowed by cross-ownership has proven most beneficial to the viewers and listeners of WGN-TV and WGN(AM). When major political stories affecting Chicago residents break, each broadcast station is able to deliver much greater in-depth coverage through its access to the *Chicago Tribune's* local political beat reporters and columnists, many of whom have years of experience covering local and national political issues, and *Chicago Tribune* writers in bureaus and locations around the world. For example, WGN-TV news anchors frequently interview *Chicago Tribune's* nationally syndicated DC-based columnist Clarence Page, political reporter Rick Pearson, and columnist John Kass to add depth to the television station's political coverage. Mr. Pearson also calls in to WGN(AM) programs several times each week to discuss political issues with the radio program hosts, and John Kass can frequently be heard on WGN(AM)'s morning programming. *Chicago Tribune's* political editor often alerts WGN-TV news personnel to major political stories the paper is covering; the television station provides the same information to the newspaper when it learns of new political developments.

⁵⁴ Since May 2009, WGN-TV also has been party to a Local News Service "LNS" agreement with WFLD(TV), WBBM-TV, and WMAQ-TV, Chicago's Fox, CBS, and NBC O&Os, respectively, under which certain video content is shared among these stations. Each of the four members of the LNS provides two photographers and one assignment desk editor. These individuals continue to be employed and paid by their respective stations, but work solely with the LNS. The LNS also separately employs a managing editor, whose salary is paid by all four member television stations. The LNS makes independent news decisions regarding what events or stories to cover and then makes "pool" video of these events available to all four members. Each individual station decides what, if any, video provided by the LNS it wishes to use. Stations can and do utilize their own reporters to cover stories for which the LNS provides video, and any reporting a member may include with the video is independently produced by the particular station.

WGN-TV viewers and WGN(AM) listeners also benefit from the stations' ability to call on *Chicago Tribune* reporters based at the newspaper's bureau in Springfield, the Illinois state capital, which is located 200 miles to the southwest of Chicago and more than three hours away by car. Neither station has the financial resources to maintain a separate bureau in the state capital; however, because of common ownership with the *Chicago Tribune*, they can readily draw on the research and insight of the paper's Springfield bureau reporters through frequent live and taped on-air reports. Ray Long, chief of the Springfield bureau, often provides on-air reports during the stations' newscasts.

WGN-TV and WGN(AM) also have ready access to additional national beat reporters working at Tribune's Washington, D.C. bureau. In 2009, for example, WGN(AM) produced and aired a special report on Illinois' infamous former Governor Rod Blagojevich. WGN(AM) reporters working on this story drew on the resources of *Chicago Tribune* reporters in Chicago, Springfield, and Washington, D.C. to add significant depth and detail to this special report. On their own, WGN-TV and WGN(AM) would not have been able to provide such coverage, but by combining their resources with those of the *Chicago Tribune*, the stations brought more in-depth information to local audiences.

Common ownership of WGN-TV and *Chicago Tribune* has also allowed each to provide significantly enhanced coverage of local elections and campaigns. Not only does WGN-TV ensure that candidates for major local, state, and federal office are interviewed on its regularly-scheduled news programs, but the television station in recent years has also collaborated with the *Chicago Tribune* to conduct joint polling on major political races. While WGN-TV alone would

not have had the financial resources to conduct its own polls, the newspaper and television station have been able to conduct improved polling together and deliver that information more broadly. For example, in the run-up to the general election in November 2008, WGN-TV and *Chicago Tribune* jointly conducted two related polling projects – one focused on national races and issues and the other on Illinois state elections. WGN-TV and *Chicago Tribune* also cooperated to conduct and report on a poll of likely Democratic primary voters prior to the February 2, 2010 primary to select the party's nominee for Cook County Board President. The polling was provided to WGN(AM), which aired separate reports about its content. The Tribune properties also collaborated on polling prior to the February 2011 Chicago mayoral election and prior to the November 2010 mid-term federal elections.

While preserving their independent editorial discretion, editors from the newspaper and assignment editors at the television station discuss the angles each plans to pursue in their election coverage during major campaign seasons. This allows each more effectively to allocate resources in covering various aspects of the campaigns and the votes. *Chicago Tribune* reporters with particular expertise and knowledge on certain races appear frequently on both WGN-TV and WGN(AM) to provide political analysis and insight. While each station executes its reporting independently, both benefit from the ability to collaborate on their political coverage and draw on the resources of the *Chicago Tribune*.

Coverage of the February 2, 2010 primary elections in Chicago to select nominees for federal, state, and local races illustrates how WGN(AM) takes advantage of the benefits of cross-ownership with *Chicago Tribune* while producing independent political reports. WGN(AM)'s

election night coverage lasted throughout the evening and featured commentary from *Chicago Tribune* political reporter Rick Pearson, as well as the paper's Illinois Political Editor James Webb. WGN(AM) also provided election night commentary from Hermene Hartman, publisher of the African American newspaper *N'Digo*, and Roosevelt University professor Paul Green, both of whom had participated shortly before then in the station's coverage of the President's State of the Union Address.

On February 2, 2010, WGN-TV worked with CLTV to provide live coverage of election returns starting at 5:00 pm until all the major races were decided, including remote reports from over 14 locations. WGN-TV aired live coverage from 5:00 pm to 6:00 pm and from 9:00 pm until the elections were called early the next morning, while CLTV aired WGN-TV-produced coverage throughout the evening.

During the campaign leading up to the primary, WGN-TV invited all candidates in the major federal, state, and local races (*i.e.*, U.S. Senate, Illinois Governor, and Cook County Board President) to participate in on-air question and answer sessions during the station's *Midday News*. These sessions were designed to let the candidates tell the voters about their positions on important issues. The segments were also posted to the station's website and aired on WGN-TV's early evening news and again during *WGN News at Nine*. Nearly all the candidates who were invited – 27 in all – took advantage of this opportunity to reach WGN-TV's viewers.

Prior to the February 2011 Chicago mayoral election, WGN-TV and WGN(AM) organized and provided live coverage of a debate among the top candidates at the WGN-TV studios. The *Chicago Tribune* co-sponsored the one-hour debate, along with the City Club of

Chicago. On election night, WGN(AM) pre-empted regular programming to bring listeners live election night coverage, featuring reports from each candidate's headquarters and analysis from the WGN(AM) and *Chicago Tribune* political teams. In 2012, WGN-TV, WGN(AM), and *Chicago Tribune* are dedicating resources to coverage of upcoming local, state, and national elections, including Illinois's Republican Party Presidential primary on March 3, 2012.

The television and radio stations and *Chicago Tribune* each also benefit from the contacts that the others have with politicians and public officials. WGN(AM) frequently serves as a virtual "meeting place" for public officials, who call in to the station's talk shows on a regular basis. Frequent guests on WGN(AM) include Sen. Dick Durbin, other members of the state's Congressional delegation, Illinois state legislators, and Chicago city aldermen. Excerpts of the transcripts of these elected officials' calls to WGN(AM) are frequently used by the *Chicago Tribune* in its print editions and on its website.

The *Chicago Tribune* editorial board meets regularly with local, state, and national newsmakers, community leaders, and other guests. The board provides the television and radio station assignment desks with the schedule of individuals who will be meeting with the board and endeavors to make these individuals available to WGN-TV and WGN(AM) reporters for interviews. WGN-TV and WGN(AM) representatives do not participate in the editorial decisions of the *Chicago Tribune* editorial board; nor does *Chicago Tribune's* editorial board participate in the editorial decisions of WGN-TV or WGN(AM).

Weather. By combining their resources and expertise, Tribune's Chicago properties have been able to bring improved local weather information and coverage to area residents. WGN-TV

has long been a leader in local television weather reporting. The television station currently employs 14 people in its weather department, including 11 professional meteorologists – one of the largest meteorological staffs of any television station in the country and an increase of two professional meteorologists since the filing of the Initial Waiver Request. WGN-TV delivers weather reports and forecasts in all of its regularly scheduled newscasts. In addition, long-time chief meteorologist Tom Skilling delivers weather reports in WGN-TV's midday, evening, and late evening newscasts. In 2008, he and his staff began providing local weather reports for WGN(AM) as well. The radio station now uses Mr. Skilling's locally-produced reports instead of airing information it previously received from the Weather Channel's national service. Mr. Skilling and his staff also provide weather forecasts to CLTV and prepare *Chicago Tribune's* daily weather page, a compendium of maps, statistics, analysis of meteorological trends, forecasts, and answers to weather-related questions from readers. This feature is hugely popular with local readers. When the newspaper relocated this page from the back page of the front section to an interior page, the resulting reader outcry convinced *Chicago Tribune* to return the reports to the back page. Each property also includes Mr. Skilling's reports on its websites. Because of their ability to utilize this expert resource, WGN-TV, WGN(AM), *Chicago Tribune*, and CLTV all deliver locally-produced weather content rather than relying on national services.

Community Service. Tribune's Chicago properties are extensively involved in the local community. Late every summer, for example, WGN-TV hosts a Back To School Fair at its Bradley Place location, at which experts provide parents with valuable information on many back-to-school issues, such as appropriate school supplies, car seat installation and use, and

current health issues affecting students. Medical professionals are also on hand to deliver advice and administer inoculations. WGN-TV organizes, publicizes, and hosts this event, which grows larger every year. WGN-TV and WGN(AM) also have joined efforts to raise awareness of, and funds for, the fight against breast cancer, including through the following initiatives:

- During Breast Cancer Awareness Month in October 2009, WGN-TV aired a locally-produced one-hour special entitled *Stories of Hope: Facing Breast Cancer*. In 2010 and 2011, WGN-TV again aired programming, both during its newscasts and in program-length specials, that featured interviews with doctors and cancer patients, not only raising awareness of the disease but presenting alternatives for those seeking help.
- In each of 2009, 2010, and 2011, WGN(AM) aired an annual three-hour breast cancer awareness special. These live town hall meetings reviewed the current state of research and treatments with some of the nation's leading medical experts. In 2010, the special included breast cancer survivor Melissa Etheridge and Dr. Mehmet Oz.
- In 2011, WGN(AM) created a reference page on its website, wgnradio.com, where listeners could find more information and listen to a podcast of the special breast cancer awareness broadcast.

From April through June of 2009, WGN-TV, and WGN(AM) teamed up to promote *Hunger Knows No Season*, a campaign that produced more than \$300,000 for the Greater Chicago Food Depository; WGN(AM) continues to support the Food Depository through the WGN Radio Neediest Kids Fund described below.

WGN-TV hosts a weekly one-on-one tutoring program with the Cotter Boys and Girls Club, and employees from all Tribune properties in Chicago have participated as tutors in this program. Through 2008, WGN-TV sponsored the Bozo Ball (called the "60th Anniversary Ball" in 2008). Proceeds from this annual fundraising gala benefited the Off the Street Club, a refuge

for youth on Chicago's West Side. In 2009, 2010, and 2011, the station continued its relationship with the organization by supporting the Club's "Save Our Summer/Send a Kid to Camp" program. During the same period, the television station has continued to produce and air a PSA campaign devoted to improving the lives of foster children with Voices for Illinois Children, an organization devoted to a wide range of issues related to child development. Through 2009, station staff also volunteered time with Chicago Cares, an annual event held to restore Chicago's public school facilities.⁵⁵

WGN(AM) has been extensively involved in a number of community events throughout Chicagoland, as well as fundraising for the station's charity, the WGN Radio Neediest Kids Fund under the umbrella of the McCormick Foundation. (The McCormick Foundation raises funds for grants to numerous non-profit organizations). Originally conceived as a holiday drive in 1969, the Neediest Kids Fund now conducts fundraising and supports children and youth in Chicagoland year-round by providing funds to childhood hunger prevention and youth education programs. Since 1992, the Neediest Kids Fund, through the McCormick Foundation, has granted well over \$18 million to local non-profits. In 2009, the Neediest Kids Fund distributed \$400,000 in grants to 22 non-profit agencies throughout Chicagoland. In 2010, that figure grew to 28 grants totaling \$500,000, and in July 2011, the Neediest Kids Fund distributed \$510,000 to 26 local non-profit organizations. Two recent examples of WGN(AM)'s year-round fundraising activities for this particular cause have included "720 Day" – WGN(AM) broadcasts on 720 kHz

⁵⁵ Attachment 2-A to the Initial Waiver Request included a more extensive list of WGN-TV's events and outreach activities. Attachment 2-B included an additional list of representative community organizations to which WGN-TV's on-air personalities have donated their energy, ideas, and time.

– which took place on July 20, 2011; throughout the day, the on-air hosts interviewed the non-profit organizations supported by the Neediest Kids Fund and encouraged audience donations. On July 30 and August 13, 2011, WGN(AM) also aired a one-hour special, “Focus on the Future, Educating Chicago’s Neediest Kids,” which featured leading education advocates discussing the challenges faced by at-risk youth in Chicago and the programs aimed at helping them.

In addition to WGN(AM)’s support of the Neediest Kids Fund, it is also involved with events throughout the year for the Juvenile Diabetes Research Foundation, the American Lung Association of Greater Chicago, the Greater Chicago Food Depository, the Children’s Neuroblastoma Cancer Foundation, Special Olympics Illinois, and Wentworth Elementary School in the city’s poverty-stricken Englewood neighborhood.⁵⁶ WGN(AM) also participated in Chicago Media Live’s radio fundraising event to benefit victims of the earthquake in Haiti, which aired from 5:00 am to 11:00 pm on Thursday, January 21, 2010, and was part of a relief campaign that raised a total of \$2,962,391.

WGN(AM) contributes to broadcast localism and fosters a sense of community through its “WGN Radio Hometown Voices Tour,” a series of monthly live broadcasts from throughout Chicagoland communities that highlight the unique people, places, and things of various communities. In 2010, the WGN Radio Hometown Voices Tour visited 10 towns in the Chicago area and in 2011, the Tour visited 12 locations. Through its Hometown Voices sponsor, Allstate, the Tour made a \$1,000 donation to a non-profit organization in each location.

⁵⁶ Attachment 2-C to the Initial Waiver Request included a list of community service events in which WGN(AM) was involved in 2008 and 2009.

One Hometown Voices broadcast involved a very unique community appeal. On November 17, 2010, a fire destroyed a bridal shop in Oak Lawn, the community from which the show's host was scheduled to broadcast the following day. In the hours after the fire, WGN(AM) launched an on-air and Facebook campaign to help connect brides-to-be who had lost their gowns with others willing to lend their dresses. The listener response was overwhelming and demonstrated not only listener generosity but the power of social media.

The creativity and community spirit of WGN(AM)'s on-air staff was also showcased last summer when, after learning that thieves had stolen the air conditioning units from Chicago's Animal Welfare League, morning host John Williams launched an on-air one-day campaign to replace the units, something the League had thought would take a year. In just five hours, Williams raised \$23,580 in contributions and the promise of an air conditioning firm that agreed to install the units for free.

WGN(AM) airs numerous PSAs for causes ranging from violence prevention in Chicago to AIDS research to statewide environmental concerns. To give a sense of the value of this commitment, in 2009, WGN(AM) broadcast 3,150 minutes of PSAs, with a total value of \$315,000 and provided 75,130 minutes of PSAs online, with a total value of \$751,300.

Awards. The superior news and public service delivered by WGN-TV and WGN(AM) have also been recognized by community groups and journalism organizations. In 2007, 2008, and 2009, for example, the Rainbow-Push Coalition conferred a Media Trailblazer Award on WGN-TV producer Pam Grimes for her outstanding coverage of Chicago's African-American community over the previous two decades and an Excellence in Media Award on News Director

Greg Caputo. Mr. Caputo has also received a Dante Award for Excellence in Media from the Joint Civic Committee of Italian-Americans.

Other recent awards received by WGN-TV for its news coverage have included the following:

- In 2011, WGN-TV earned 11 local Emmy awards, more than any other television station in the market, including awards for News Gathering – Single Investigative Story and Series, News Specialty Report/Series – Politics/Government, and Documentary Programs (The award for investigative reporting honored a story that uncovered corrupt hiring practices in the Cook County Assessor’s Office);
- In 2010, WGN-TV won five local Emmy awards, including four for Specialty Reports in different substantive areas and one for Writing;
- In 2009, WGN-TV won six local Emmy awards, including two awards for On-air Excellence, which went to WGN-TV news anchor Larry Potash and reporter Marcus Leshock; awards for Best Specialty Reports in the categories of Culture and Traffic; and awards for Best Soft News Feature and Best Off-Camera Directing;
- Multiple Excellence in Media Awards from the National Association of Black Journalists, including a 2009 General Assignment News Award for a report titled “The ‘N’ Word” by reporter Antwan Lewis;
- In 2008, six local Emmys, including two awards for specialty reports in science and the arts;
- Peter Lisagor Awards for Exemplary Journalism from the Chicago Headline Club (Society of Professional Journalists), including a 2008 award for Best In-Depth News Story;
- Silver Dome Awards from the Illinois Broadcasters Association, including three 2011 awards for Best Anchor, Best Hard News, and Best Live Coverage; three 2010 awards for Best Live Coverage, Best Hard News, and Best Anchor; two 2009 awards for Best TV Anchor and Best Use of Interactive Media; and six 2008 awards for Best Late Evening Newscast, Best Live Coverage, Best Weathercast, Best Editorial, and Best Use of Interactive Media; and

- Illinois Associated Press Broadcasters' Awards, including an award for Best Newscast in 2007.

WGN(AM) has also received numerous awards, including the following:

- Chicago Headline Club's 2011 Peter Lisagor Award for Best Radio Newscast;
- National Association of Broadcasters Marconi Awards for Best News/Talk/Sports station in the country in 2009 and 2004; Major Market Station of the Year in 2007, 2002, and 1993; and Legendary Station in 1990;
- Seven 2011 Silver Dome Awards from the Illinois Broadcasters Association for Station of the Year, Best Station Website, Best Radio Sportscaster, Best Sports Play-by-Play, Best Local Broadcast Team, Best Local Public Affairs Programs, and Best Use of New Media; nine 2010 Silver Dome Awards, including one for Station of the Year; and five 2009 Silver Dome Awards for Station of the Year, Best Local Radio Newscast, Best Local Public Affairs Program, Best Sports Play-By-Play, and Best Use of New Media (The 2011 award for local public affairs honored the breast cancer awareness program discussed in detail above);
- 2007, 2008, and 2009 Edward R. Murrow Awards from the Radio and Television News Directors Association, including a 2008 award for Overall Excellence for WGN Radio News; and
- Multiple Illinois Associated Press Awards in numerous categories, including Best Series, Best Reporter, and Best Investigative Series.⁵⁷

IV. THE REORGANIZED LICENSEE IS ENTITLED TO A PERMANENT WAIVER OF THE NBCO RULE.

In its Initial Waiver Request, the Reorganized Licensee demonstrated that it is entitled to a permanent waiver of the NBCO Rule that would allow continued common ownership of the properties by the Reorganized Licensee, as well as subsequent sale of the properties in tandem.⁵⁸

⁵⁷ Attachments 2-D1 and 2-E1 hereto provide extensive lists of awards received by WGN-TV and WGN(AM) prior to filing the Initial Waiver Request, updated to include more recent awards as well.

⁵⁸ See Initial Waiver Request Section IV.

Although the Initial Waiver Request addressed the modified NBCO Rule waiver standards which the FCC adopted in 2008 and which the Third Circuit vacated in *Prometheus II*, the Reorganized Licensee also explained that even if those modified standards were found not to be applicable to the Waiver Request for some reason (including potential developments in the Third Circuit litigation), a permanent waiver would be appropriate under prior waiver standards.⁵⁹

When the Commission first adopted the absolute ban on newspaper/broadcast cross-ownership in 1975, it acknowledged that waivers of the rule should be available when “*for whatever reason*, the purposes of the rule would be disserved by divestiture” and those purposes “would be better served by continuation of the current ownership pattern.”⁶⁰ The Initial Waiver Request demonstrated that grant of a waiver under this standard was warranted because the evidentiary record here not only satisfies the waiver test on its face, but also contains a factual showing that is at least as compelling as prior situations in which the agency has granted such relief.⁶¹ The Reorganized Licensee’s initial showing of entitlement to a waiver under the 1975 standard is even more compelling now, particularly given the ever-expanding competition and media diversity and growing economic pressures that newspaper and broadcast stations currently face as well as the co-owned properties’ continuing record of outstanding local service—a record

⁵⁹ *See id.*

⁶⁰ *Multiple Ownership of Standard, FM & Television Broad. Stations*, Second Report and Order, 50 F.C.C.2d 1046, 1085 (¶ 119) (1975), *aff’d* *FCC v. Nat’l Citizens Comm. for Broad.*, 436 U.S. 775 (1978).

⁶¹ *See* Initial Waiver Request Section IV.

that would be unlikely to be maintained if the FCC were to compel separation of the properties at issue.⁶²

Furthermore, it is notable that the *Future of Media Report* correctly concluded that allowing combinations of newspaper and broadcast properties can produce synergies that result in increases in the quantity and improvement in the quality of news and other information available to consumers in the local marketplace. Indeed, the *Report* correctly observes that a greater number of independent media outlets in a market “*is not necessarily better*,” thus undermining the central premise behind the NBCO Rule itself: “The nature of the ‘diversity’ calculus may have changed. In an earlier day, it was reasonable to assume that a diversity of ‘voices’ indicated general media health. Now, a media market can simultaneously have a diversity of voices and opinions and yet a scarcity of journalism.”⁶³ In addition, the *2011 NPRM* acknowledges that “[c]ompulsory divestiture is disruptive to the industry and to individual owners,” an acknowledgment with particular relevance here given that all of the combinations at issue have been under common ownership for a number of years.⁶⁴

Finally, it bears reiteration that the requested waiver would not create a new media combination and thus necessarily would not result in any diminution in diversity or competition, a factor which the FCC has relied on in numerous prior cases in which it has granted permanent

⁶² See *supra* Sections II-III.

⁶³ *Future of Media Report* at 312; see also *id* at 26.

⁶⁴ *2011 NPRM*, ¶¶ 100, 114.

waivers of the media ownership rules.⁶⁵ As a result—and particularly in view of the duration of Tribune’s bankruptcy proceedings and the need for the Commission to afford comity to the bankruptcy process—a permanent waiver of the NBCO Rule is appropriate.

V. AT A MINIMUM, THE REORGANIZED LICENSEE IS ENTITLED TO A TEMPORARY WAIVER PENDING PROCEEDINGS TO REVISE THE NBCO RULE.

In its Initial Waiver Request, the Reorganized Licensee established that, if the Commission were for some reason to conclude that a permanent waiver of the NBCO Rule is not appropriate, the agency should at a minimum grant a temporary waiver of the rule until 18 months after the pending proceedings to revise it become final.⁶⁶ As explained therein, the FCC has previously granted such waivers when the public interest would be served, and particularly in the face of “protracted rulemaking proceedings” in which there is “a substantial record on which

⁶⁵ See, e.g., *AMFM, Inc.*, Memorandum Opinion and Order, 15 FCC Rcd 16,062, 16,069 (¶ 15) (2000) (allowing transfer of an existing combination and recognizing that such a transfer “do[es] not increase the combined advertising revenue shares of ... existing groups or result in increased levels of ownership concentration”); *EWS News Corp.*, Memorandum Opinion and Order, 12 FCC Rcd 20,243, 20,247 (¶ 15) (1997) (awarding permanent waiver and stating that “since grant of this application will preserve an existing combination, we do not believe that continued joint ownership of the stations will decrease the level of diversity and competition in the market”); see also *Solar Broad. Co.*, Memorandum Opinion and Order, 17 FCC Rcd 5467, 5475 (¶ 24) (2002); *Am. Radio Sys. Corp.*, Memorandum Opinion and Order, 13 FCC Rcd 12,430, 12,437-48 (¶ 11) (1998); *Houston H. Harte*, Memorandum Opinion and Order, 12 FCC Rcd 13,418, 13,422-23 (¶ 16) (1997); *Paso Del Norte Broad. Corp.*, Memorandum Opinion and Order, 12 FCC Rcd 6876, 6882 (¶¶ 13-14) (1997); *River City License P’ship*, Memorandum Opinion and Order, 12 FCC Rcd 4993, 4997-98 (¶ 13) (1997); *Kelso Partners IV, L.P.*, Memorandum Opinion and Order, 11 FCC Rcd 8764, 8768-69 (¶ 11) (1996). Accord *United States Department of Justice and Federal Trade Commission Horizontal Merger Guidelines* (Aug. 19, 2010) at 19, available at <http://www.justice.gov/atr/public/guidelines/hmg-2010.html> (last visited Mar. 15, 2012) (stating that transfers that do not increase ownership concentration are “unlikely to have adverse competitive consequences and ordinarily require no further analysis”).

⁶⁶ See Initial Waiver Request Section V.

to base a preliminary inclination to relax or eliminate a rule.”⁶⁷ The Initial Waiver Request demonstrated that Commission precedent supports grant of a waiver involving such proceedings where an application also “falls within the scope of the proposals in the proceeding, and a grant of an interim waiver would be consistent with the goals of competition and diversity.”⁶⁸ As the FCC has emphatically stated, “[w]hat is important is whether the public interest would be served by a grant of a waiver”; here, there can simply be no dispute that it would.⁶⁹

Since the filing of the Initial Waiver Request in 2010, the proceedings to revise the NBCO Rule have only become more “protracted” and the record supporting its relaxation or elimination even more “substantial” (particularly when considering the findings of the *Future of Media Report*); it has only become more clear that an interim waiver would comport with the FCC’s goals of promoting diversity, localism, and competition; and, all the while, the requested waiver has remained within the scope of the proposals in the proceedings to revise the rule.

Indeed, the Commission is now well into the second decade of proceedings to revise the rule.⁷⁰ The FCC recently released its *2011 NPRM*, having received comments on a Notice of Inquiry in the summer of 2010 and completed and publicly released eleven research studies in the summer of 2011. This 2010 Quadrennial Review proceeding is the *fifth* successive periodic

⁶⁷ *1998 Biennial Regulatory Review*, Notice of Inquiry, 13 FCC Rcd 11,276, 11,294 (¶ 56) (1998) (“*1998 Biennial Review NOF*”).

⁶⁸ *Id.*

⁶⁹ *Id.* at 11,294-95.

⁷⁰ See Initial Waiver Request Section V.

review to be conducted pursuant to § 202(h) of the Telecommunications Act of 1996 and the seventh proceeding to consider reform of the NBCO Rule when a 1996 *Notice of Inquiry* and 2001 *Notice of Proposed Rulemaking* focused solely on the NBCO Rule are taken into account.⁷¹

As an initial matter, there can be little doubt that the record assembled in response to the 2011 *NPRM* will further support repeal, or at least substantial relaxation, of the rule, particularly in light of the continued marketplace changes that are documented above.⁷² In addition, the FCC itself has now found, on *three separate occasions*, that maintenance of the absolute ban cannot be justified.⁷³ Most recently, in the 2011 *NPRM* the FCC states that it “continues to believe . . . that a blanket prohibition on newspaper/broadcast combinations is overly broad and does not allow for certain cross-ownership that may carry public interest benefits.”⁷⁴ The Third Circuit expressly *upheld* the FCC’s previous determination on this issue in *Prometheus I*.⁷⁵ And, the remand in *Prometheus II* was based not on any substantive disagreement with the Commission’s bottom-line conclusion that the rule was ripe for at least some relaxation, but on the ground that the agency had failed to comply with the APA’s notice and comment requirements as to the

⁷¹ *Newspaper/Radio Cross-Ownership Waiver Policy*, Notice of Inquiry, 11 FCC Rcd 13003 (1996); *Cross-Ownership of Broad. Stations and Newspaper*; *Newspaper/Radio Cross-Ownership Waiver Policy*, Order and Notice of Proposed Rulemaking, 16 FCC Rcd 17283 (2001).

⁷² See *supra* Section II.

⁷³ See Initial Waiver Request Section V.

⁷⁴ 2011 *NPRM*, ¶ 89.

⁷⁵ *Prometheus Radio Project v. FCC*, 373 F.3d 372, 398-400 (3d Cir. 2004), *cert. denied*, 545 U.S. 1123 (2005) (“*Prometheus I*”).

specific standards adopted in 2008.⁷⁶ Given these rulemaking determinations that an absolute ban on newspaper/broadcast cross-ownership should not be enforced, a failure to grant the requested waiver would be arbitrary and capricious. And, there is certainly no arguable basis on which to conclude that the proceedings concerning the NBCO Rule are not “protracted” or that there is not a “substantial record . . . on which to base a *preliminary* inclination to relax or eliminate” the NBCO Rule.⁷⁷

The requested waiver is also clearly within the scope of the proposals for revision that have been set forth in these protracted proceedings. The Initial Waiver Request documented compliance with the 2008 waiver standards, which the Commission largely proposes to reinstate in the *2011 NPRM*.⁷⁸ The Initial Waiver Request demonstrated, moreover that the Reorganized Licensee would have been entitled to a waiver under the 2003 version of the NBCO Rule, a demonstration which similarly remains relevant to the instant showing.⁷⁹

Finally, the grant—at a minimum—of a temporary waiver remains consistent with the Commission’s diversity, localism, and competition goals. The combination’s outstanding record of public service has, as shown above, continued since the filing of the Initial Waiver Request,

⁷⁶ *Prometheus II*, 652 F.3d at 449-54.

⁷⁷ *1998 Biennial Review NOI*, 13 FCC Rcd at 11,294 (¶ 56) (emphasis added).

⁷⁸ See Initial Waiver Request Sections IV, V. Thus, particularly given the *2011 NPRM*’s suggestion that the newspaper/radio rule should be eliminated in its entirety, the fact that the second broadcast station in the combination is a radio outlet continues to weigh heavily in favor of the grant of a waiver. See *id.* Section IV.

⁷⁹ See *id.* Section V.

while the market has become even more diverse and competitive.⁸⁰ Here again, because this transaction involves only the transfer of *existing* ownership interests, allowing continued cross-ownership by definition cannot have any adverse impact on existing diversity or competition levels.⁸¹

In sum, under these circumstances, and as the Reorganized Licensee established previously, it would be arbitrary and capricious, inequitable, inconsistent with the FCC's policy of affording comity to the bankruptcy process, and wholly contrary to the public interest for the Commission to require the instant combination to be disassembled. At the very least, a temporary waiver pending conclusion of proceedings to revise the NBCO Rule is warranted on this record.

VI. CONCLUSION

For the reasons set forth above and those provided in the Initial Waiver Request, the FCC should grant the Reorganized Licensee a permanent waiver of the NBCO Rule permitting the continued common ownership of the properties at issue and also permitting a subsequent sale of those properties in tandem. At the very least, the FCC should grant a temporary waiver extending until 18 months after the Commission completes its pending review of the NBCO Rule and that action becomes a final order no longer subject to judicial review.

⁸⁰ See *supra* Sections II, III.

⁸¹ See *supra* note 65.

WGN-TV JOURNALISM AWARDS

<u>Date</u>	<u>Organization</u>	<u>Award</u>	<u>Category</u>	<u>Entrant</u>
2011	Illinois Broadcasters Association	Best Anchor	Silver Dome Award Winner	Larry Potash
2011	Illinois Broadcasters Association	Best Hard News	Silver Dome Award Winner	<i>Phobia Claims</i>
2011	Illinois Broadcasters Association	Best Live Coverage	Silver Dome Award Winner	<i>Missing Firefighters</i>
2011	TV Academy	Single Investigative Story and Series	Regional Emmy Award	Marsha Bartel, Mike D'Angelo, Leo Brucato, and Jordan Guzzardo
2011	TV Academy	News Specialty Report/Series – Business/Consumer	Regional Emmy Award	Marcus LeShock
2011	TV Academy	News Specialty Report/Series – Human Interest	Regional Emmy Award	Keenan Cahill, Paul Konrad, Steve Sheuer, Pamela Grimes
2011	TV Academy	News Specialty Report/Series – Politics/Government	Regional Emmy Award	Marsha Bartel, Ray Ruiz, Joe Lynn, Mark Suppelsa
2011	TV Academy	Documentary Programs	Regional Emmy Award	Tom Skilling, Pamela Grimes, Mike D'Angelo
2011	TV Academy	Magazine Programming – Program/Special/Series	Regional Emmy Award	Josh Kaufman, David Rosenberg, Matt Knutson, Jordan Arseneau, Mike Janowski, Ted Brunson, Brittney Payton
2011	TV Academy	Public Affairs/Current Affairs Programming	Regional Emmy Award	Steven Novak, Dean Richards, and Dina Bair

2011	TV Academy	Best News Promo Single Spot/Campaign (non-news)	Regional Emmy Award	Jonathan Lacocque
2011	TV Academy	Program Promotion Single Spot/Campaign(non-news)	Regional Emmy Award	Andrew Lennie
2011	TV Academy	Best Program Host/Moderator/Contributor	Regional Emmy Award	Ted Brunson
2011	TV Academy	Best Graphic Arts/Animation/Art Directions/Set Design	Regional Emmy Award	Andrew Lennie, Bernard Ong, Michael Kislovsky, Eric Diga, William Craig, Ryan Johnson
2010	Illinois Broadcasters Association	Best Local Public Affairs	Silver Dome Award Winner	<i>Stories of Hope</i>
2010	Illinois Broadcasters Association	Best Anchor	Silver Dome Award Winner	Larry Potash
2010	TV Academy	Best Specialty Report, Weather: Chased by Tornadoes	Regional Emmy Award	Pam Grimes, Steve Scheuer, Bill O'Toole, Jordan Guzzardo, Tom Skilling
2010	TV Academy	Best Specialty Report, Education: 85-year-old College Student	Regional Emmy Award	Antwan Lewis, Mike D'Angelo
2010	TV Academy	Best Specialty Report, Education: Debatable	Regional Emmy Award	Sean Lewis, Mike D'Angelo, Manny Medina, Nelson Howard
2010	TV Academy	Best Specialty Report, Culture: Hispanic Heritage Month	Regional Emmy Award	Vicky Thomas, Lourdes Duarte, Ana Belaval

2010	TV Academy	Best Writing: Honor Flight Chicago	Regional Emmy Award	Pam Grimes
2009	National Association of Television Arts and Sciences	Best Specialty Report/Culture	Regional Emmy Award	"The 'B' Word" -- Antwan Lewis and Pam Grimes
2009	National Association of Television Arts and Sciences	Best Specialty Report/Traffic	Regional Emmy Award	"Chicago Olympic Traffic" -- Antwan Lewis
2009	National Association of Television Arts and Sciences	Best On Camera Excellence/News	Regional Emmy Award	Larry Potash/WGN-TV News Anchor
2009	National Association of Television Arts and Sciences	Best On Camera Excellence/Programming	Regional Emmy Award	Marcus Leshock/Reporter
2009	National Association of Television Arts and Sciences	Best News Feature/Soft News	Regional Emmy Award	"American Idol Recaps" -- Marcus Leshock
2009	National Association of Television Arts and Sciences	Best Off Camera/Directing	Regional Emmy Award	Mike Lasky/Director
2009	Illinois Broadcasters Association	Best Use of Interactive Media	Silver Dome Winner	WGN News Team
2009	Illinois Broadcasters Association	Best TV Anchor	Silver Dome Winner	Larry Potash
2009	Illinois Broadcasters Association	Best Locally Produced Public Affairs Program	2nd Place	"Stories of Hope: Facing Breast Cancer" -- Dean Richards, Dina Bair
2009	Illinois Broadcasters Association	Best TV Newscast	2nd Place	"Financial Bailout" -- WGN Midday News
2009	Illinois Broadcasters Association	Best Locally Produced Non-Public Affairs Program	3rd Place	"WGN at 60 Chicago's Very Own" -- Steven Novak
2009	Illinois Broadcasters Association	Best Locally Produced Public Affairs Program	3rd Place	"Circle of Care: Living with Diabetes" --Dina Bair, Valerie Warner

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2009	Illinois Broadcasters Association	Best Live Coverage	3rd Place	"2008 Thanksgiving Day Parade" -- Bob Vorwal, Joe Dix
2009	National Association of Black Journalists	General Assignment News	Winner	"The 'N' Word" -- Antwan Lewis
2008	National Academy of Television Arts and Sciences	Hard News Feature	Regional Emmy Award	"The 'N' Word" -- Antwan Lewis
2008	National Academy of Television Arts and Sciences	Specialty Report/Science	Regional Emmy Award	"The Greening of Chicago" -- Ana Belaval, Terry Barthel
2008	National Academy of Television Arts and Sciences	Specialty Report/Arts, Culture	Regional Emmy Award	"The Façade Project" -- Steve Sanders
2008	National Academy of Television Arts and Sciences	Sports Program	Regional Emmy Award	"Cubs Forever" -- Bob Vorwald
2008	National Academy of Television Arts and Sciences	Individual Achievement/Photography	Regional Emmy Award	Mike D'Angelo
2008	National Academy of Television Arts and Sciences	Individual Achievement/News Editing	Regional Emmy Award	Vicky Thomas
2008	Chicago Headline Club	Best In-Depth News Story	Peter Lisagor Award -- Winner	"Looking for Justice" -- Jackie Bange, Nelson Howard, Rick Strasser
2008	Chicago Headline Club	Best Sports Story	Peter Lisagor Award -- Winner	"Little Sluggers" -- Pam Grimes
2008	National Association of Black Journalists	Public Affairs Segment	Winner	"People to People: Black Women on Don Imus" -- Allison Payne, Gloria Brown

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2008	National Association of Black Journalists	Public Affairs Program	Finalist	"People to People: Ghana Independence Celebration" -- Allison Payne, Gloria Brown, Vicky Baftiri
2008	National Association of Black Journalists	Public Affairs Interview/Discussion	Finalist	"People to People: Johnathon Butler & Dorothy Brown" -- Allison Payne, Gloria Brown
2008	Illinois Broadcasters Association	Best Public Affairs Program	Silver Dome Winner	"Adelante" -- Lourdes Duarte
2008	Illinois Broadcasters Association	Best Editorial	Silver Dome Winner	"Voicemail: Grammar Rant" --WGN Morning News Team
2008	Illinois Broadcasters Association	Best Live Coverage	Silver Dome Winner	WGN News Team
2008	Illinois Broadcasters Association	Best Weathercast	Silver Dome Winner	WGN News Team
2008	Illinois Broadcasters Association	Best Use of Interactive Media	Silver Dome Winner	"You Tube: I own the station" --Pat Tomasulo
2008	Illinois Broadcasters Association	Best Late Evening Newscast	Silver Dome Winner	WGN News Team
2007	National Academy of Television Arts and Sciences	Specialty Reporting/Politics and Government	Regional Emmy Award	"Jackson & Jackson" -- Allison Payne, Pam Grimes
2007	National Academy of Television Arts and Sciences	Specialty Reporting/Transportation	Regional Emmy Award	"One Tank Trip" -- Ana Belaval, Terry Barthel
2007	National Academy of Television Arts and Sciences	Individual Achievement/On Camera	Regional Emmy Award	Allison Payne
2007	National Academy of Television Arts and Sciences	Individual Achievement/Directing	Regional Emmy Award	Sarah Fisher

2007	National Academy of Television Arts and Sciences	Individual Achievement/Photography	Regional Emmy Award	Steve Scheuer
2007	Chicago Headline Club	Deadline Reporting	Peter Lisagor Award -- Winner	"First Day of School" -- Pam Grimes, Steve Scheuer
2007	Chicago Headline Club	Soft News Feature	Peter Lisagor Award -- Finalist	"Façade Project" -- Steve Sanders
2007	National Association of Black Journalists	Long Form Feature	First Place	"Missing Women of Color" -- Allison Payne, Brittany Abbate, Ted Parra
2007	National Association of Black Journalists	Long Form Feature	Finalist	"Blue Eyes, Black Soul" -- Allison Payne, Pam Grimes, Mike D'Angelo
2007	Illinois Associated Press	Best Newscast	Winner	"WGN News at Nine"
2007	Illinois Associated Press	Best Light Feature	Winner	"Dog Tags Returned" -- Steve Sanders, Pam Grimes, Mike D'Angelo
2007	Illinois Associated Press	Best Light Feature	2nd Place	"The Toymaker" -- Katharin Czink, Ted Parra
2007	Illinois Associated Press	Best Hard News Feature	2nd Place	"Missing Women of Color" -- Allison Payne, Brittany Abbate, Ted Parra
2007	Illinois Associated Press	Best Videography	Winner	"Clean the Bean" -- Steve Scheuer
2007	Illinois Associated Press	Best videography	2nd Place	"Dog Tags Returned" -- Mike D'Angelo
2006	National Academy of Television Arts and Sciences	Specialty Report/Medical	Regional Emmy Award	"Cord Blood, Life Saving Serum" -- Dina Bair & Katharin Czink

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2006	National Academy of Television Arts and Sciences	Specialty Report/Religion	Regional Emmy Award	"Blue Eyes, Black Soul" -- Allison Payne, Pam Grimes, Mike D'Angelo
2006	National Academy of Television Arts and Sciences	Public Affairs Program	Regional Emmy Award	"People to People" -- Gloria Brown, Allison Payne, Steve Sanders
2006	National Academy of Television Arts and Sciences	Individual Achievement/On Camera	Regional Emmy Award	Larry Potash
2006	National Academy of Television Arts and Sciences	Individual Achievement/Directing	Regional Emmy Award	"WGN News at Noon" -- Mike Lasky
2006	National Academy of Television Arts and Sciences	Individual Achievement/News Videography	Regional Emmy Award	Mike D'Angelo
2006	Chicago Headline Club	Soft News Feature	Peter Lisagor Award	"Last Typewriter Repairman" --Pam Grimes, Steve Sanders, Mike D'Angelo
2006	Illinois Associated Press	Hard News Feature	First Place	"Into the Darkness" --
2006	Illinois Associated Press	Videography	First Place	"Boys of Summer" -- Mike D'Angelo
2006	Illinois Associated Press	Videography	Second Place	"Chalk Talk" -- Mike D'Angelo
2006	Illinois Associated Press	Documentary	Second Place	"Tsunamis on American Shores" -- Tom Skilling

WGN-AM AWARDS, 2007-2012

<u>Date</u>	<u>Organization</u>	<u>Award</u>	<u>Category/Honor</u>	<u>Entrant/Winner</u>
2012	William & Mary Diederich College of Communication at Marquette University	Alumni National Awards	Communicator of the Year Award	Steve Bertrand
2012	National Sportscasters and Sportswriters Association	2011 Illinois Sportscaster of the Year	2011 Illinois Sportscaster of the Year	Dave Eanet
2011	Illinois Broadcasters Association	Station of the Year	Silver Dome Award Winner	WGN Radio
2011	Illinois Broadcasters Association	Best Station Website	Silver Dome Award Winner	www.wgnradio.com
2011	Illinois Broadcasters Association	Best Radio Sportscaster	Silver Dome Award Winner	Dave Eanet
2011	Illinois Broadcasters Association	Best Sports Play-By-Play	Silver Dome Award Winner	Chicago Blackhawks broadcasters John Wiedeman and Troy Murray
2011	Illinois Broadcasters Association	Best Local Broadcast Team	Silver Dome Award Winner	Steve King & Johnnie Putman
2011	Illinois Broadcasters Association	Best Local Public Affairs Program	Silver Dome Award Winner	Dean Richards' Breast Cancer 2010
2011	Illinois Broadcasters Association	Best Use Of New Media	Silver Dome Award Winner	Eva's Bridals fire Facebook campaign
2011	Chicago Headline Club	Peter Lisagor Award	Best Radio Newscast	WGN Radio News

<u>Date</u>	<u>Organization</u>	<u>Award</u>	<u>Category/Honor</u>	<u>Entrant/Winner</u>
2011	Illinois Associated Press Broadcasters Association	Journalism Excellence award	Outstanding News Operation	WGN Radio News
2011	Illinois Associated Press Broadcasters Association	Journalism Excellence award	Best Newscast	Jim Gudas, Rob Hart, Orion Samuelson and Dave Eanet
2010	Talkers Magazine	20 th anniversary “Heaviest Hundred” list, which named the 100 most important radio talk show hosts of all time	#77 out of 100	Garry Meier
2010	Illinois Broadcasters Association	Station of the Year	Silver Dome Award Winner	WGN Radio
2010	Illinois Broadcasters Association	Best Local Radio Newscast	Silver Dome Award Winner	Andrea Darlas
2010	Illinois Broadcasters Association	Best Live Coverage of an Event for WGN Radio News Team Coverage of the Gold Coast High Rise Fire	Silver Dome Award Winner	WGN Radio News
2010	Illinois Broadcasters Association	Best Radio News Reporter	Silver Dome Award Winner	Rob Hart
2010	Illinois Broadcasters Association	Best Radio Sportscaster	Silver Dome Award Winner	Dave Eanet

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2010	Illinois Broadcasters Association	Best Sports Play-by-Play	Silver Dome Award Winner	Chicago Blackhawks broadcasters John Wiedeman and Troy Murray
2010	Illinois Broadcasters Association	Best Local Radio Show	Silver Dome Award Winner	Blackhawks Confidential
2010	Illinois Broadcasters Association	Best Local Public Affairs Program	Silver Dome Award Winner	Dean Richards' Breast Cancer 2009
2010	Illinois Broadcasters Association	Best Locally Produced PSA	Silver Dome Award Winner	WGN Radio Neediest Kids Fund.
2010	National Association of Broadcasters	Crystal Award	Outstanding Commitment to Community Service – One of 50 finalists nationally	WGN Radio
2010	Illinois Associated Press Broadcasters Association	Journalism Excellence award	1 st place for Best Light Feature for a series of reports entitled “Last Ride at Kiddieland”	Don Norton
2010	Illinois Associated Press Broadcasters Association	Journalism Excellence award	1 st place in Best Spot News for coverage of the Dec. 10 Gold Coast high-rise fire	WGN Radio News staff
2010	National Sportscasters and Sportswriters Association	Sportscaster of the Year	Recipient	Pat Hughes

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2009	National Association of Broadcasters	Marconi Award	Station of the Year - Finalist	WGN(AM)
2009	National Association of Broadcasters	Crystal Award	Outstanding Commitment to Community Service - Finalist	WGN(AM)
2009	Illinois Broadcasters Association	Station of the Year	Silver Dome Winner	WGN(AM)
2009	Illinois Broadcasters Association	Best Local Radio Newscast	Silver Dome Winner	Steve Alexander
2009	Illinois Broadcasters Association	Best Local Public Affairs Program	Silver Dome Winner	Dean Richards' "Breast Cancer 2008"
2009	Illinois Broadcasters Association	Best Sports Play-By-Play	Silver Dome Winner	Pat Hughes and Ron Santo, Cubs Baseball
2009	Illinois Broadcasters Association	Best Use of New Media	Silver Dome Winner	Rivalry Rumble Video
2009	Illinois Broadcasters Association	Best Live Coverage of an Event	2nd Place	WGN Radio News, Northern Illinois Shootings
2009	Illinois Broadcasters Association	Best Locally Produced PSA for Local Charity/Cause	2nd Place	Neighbors in Need Flood Relief PSA
2009	Illinois Broadcasters Association	Best Sportscaster	2nd Place	Dave Eanet
2009	Illinois Broadcasters Association	Best Radio Personality	2nd Place	Steve Cochran

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2009	Illinois Broadcasters Association	Best Local Broadcast Team	2nd Place	Kathy & Judy
2009	Illinois Broadcasters Association	Best Play-by-Play	2nd Place	Dave Eanet, Northwestern Basketball
2009	Illinois Broadcasters Association	Best Locally Produced Show	3rd Place	Cubs Confidential
2009	Illinois Broadcasters Association	Best Station Self-Promotional & On-Air Spot	3rd Place	“Why Can’t We Be Friends” Cubs/Sox promo
2009	Illinois Broadcasters Association	Best Local Broadcast Team	3rd Place	Steve King and Johnnie Putman
2009	Illinois Broadcasters Association	Best Play-by-Play	3rd Place	Dave Eanet, Northwestern Football
2009	Illinois Broadcasters Association	Best Community Service Activity	3rd Place	720 Day
2009	Illinois Broadcasters Association	Best Use of New Media	3rd Place	Go Cubs Go Music Video
2009	Radio & Records	News/Talk/Sports General Manager of the Year	Winner	Tom Langmyer
2009	Talkers Magazine	Heavy Hundred, the 100 most important radio talk show hosts in America	Honoree	Kathy & Judy

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2009	Talkers Magazine	Talkers Top 250	Honorees	John Williams, Steve Cochran, and Milt Rosenberg
2009	Illinois Associated Press	Best Series	Winner	“Changing the Odds”, Steve Bertrand
2009	Illinois Associated Press	Best Reporter	2nd Place	Jim Gudas
2009	Illinois Associated Press	Best Newscast	2nd Place	Andrea Darlas
2009	Illinois Associated Press	Best Spot News	2nd Place	“Terror on Campus”, WGN Radio News
2009	Illinois Associated Press	Outstanding News Operation	2nd Place	WGN Radio News
2009	Chicago Headline Club	Best Series	Peter Lisagor Award - Finalist	“Changing the Odds”, Steve Bertrand
2009	Radio and Television News Directors Association	Edward R. Murrow Award	Winner	“Terror on Campus”, WGN Radio News
2009	Chicago Bar Association	Herman Kogan Award	Meritorious Achievement	"You are the Jury" segment, <i>Legally Speaking</i> , Greg Adamski and Karen Conti
2008	National Association of Broadcasters	Crystal Award	Outstanding Commitment to Community Service - Finalist	WGN(AM)
2008	Illinois Broadcasters Association	Station of the Year	Silver Dome Winner	WGN(AM)
2008	Illinois Broadcasters Association	Best Local Radio Newscast	Silver Dome Winner	Andrea Darlas

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2008	Illinois Broadcasters Association	Best Local Radio Sportscast	Silver Dome Winner	Dave Eanet
2008	Illinois Broadcasters Association	Best Use of Interactive Media	Silver Dome Winner	John Williams' Bracket Battles
2008	Illinois Broadcasters Association	Best Website Promotion	Silver Dome Winner	WGN Radio e-newsletters
2008	Illinois Broadcasters Association	Best Self-Promotional Use of Other Media	Silver Dome Winner	Hometown Voices Tour Print Ad Campaign
2008	Illinois Broadcasters Association	Podcasting	Silver Dome Winner	Nick Digilio Show Podcast
2008	Illinois Broadcasters Association	Best Live Coverage of an Event	Silver Dome Finalist	"Storms of August", WGN Radio News
2008	Illinois Broadcasters Association	Best Play By Play	Silver Dome Finalist	Pat Hughes and Ron Santo, Cubs Baseball
2008	Illinois Broadcasters Association	Best Play By Play	Silver Dome Finalist	Dave Eanet, Northwestern Football
2008	Illinois Broadcasters Association	Best Local Public Affairs Program	Silver Dome Finalist	"Surviving Breast Cancer, Surviving Health Care", Dean Richards
2008	Illinois Broadcasters Association	Best Local Public Affairs Program	Silver Dome Finalist	Extension 720 with Milt Rosenberg

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2008	Illinois Broadcasters Association	Best Local Broadcast Team	Silver Dome Finalist	Kathy & Judy
2008	Illinois Broadcasters Association	Best Local Broadcast Team	Silver Dome Finalist	Steve King and Johnnie Putman
2008	Illinois Broadcasters Association	Best Community Service Activity	Silver Dome Finalist	720 Day
2008	Illinois Broadcasters Association	Podcasting	Silver Dome Finalist	The Kathy & Judy Show Podcast
2008	Illinois Broadcasters Association	Best Website	Silver Dome Finalist	www.wgnradio.com
2008	National Endowment for the Humanities	National Humanities Medal	Recipient	Milt Rosenberg
2008	Radio and Television News Directors Association	Edward R. Murrow Award	Overall Excellence - Winner	WGN Radio News
2008	Radio and Television News Directors Association	Edward R. Murrow Award	Best Series - Winner	"Why Not Me?", Judy Pielach
2008	Radio and Television News Directors Association	Edward R. Murrow Award	Best Spot News Coverage - Winner	WGN Radio News, "Storms of August"
2008	American Academy of Allergy, Asthma and Immunology	Broadcast Excellence	Winner	"Food for Thought," Andrea Darlas
2008	Illinois Theatre Association	Award of Honor	Recipient	Dean Richards
2008	National Sportscasters and Sportswriters Association	Sportscaster of the Year	Recipient	Pat Hughes

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2008	American Women in Radio & Television	Gracie Allen Award	Recipient	Kathy & Judy
2007	National Association of Broadcasters	Marconi Award	Major Market Station of the Year	WGN(AM)
2007	Illinois Broadcasters Association	Best Local Public Affairs Program	Silver Dome Winner	“Breast Cancer 2006: The Heroes”, Dean Richards
2007	Illinois Broadcasters Association	Best Live Coverage of an Event	Silver Dome Finalist	Coverage of the 500 W. Madison Shootings, WGN Radio News
2007	Illinois Broadcasters Association	Best Live Coverage of an Event	Silver Dome Finalist	Coverage of the Pilgrim Baptist Fire, WGN Radio News
2007	Illinois Broadcasters Association	Best Live Coverage of an Event	Silver Dome Finalist	Coverage of the George Ryan verdict
2007	Illinois Broadcasters Association	Best Local Morning Show	Silver Dome Finalist	The Spike O'Dell Show
2007	Illinois Broadcasters Association	Best Local Public Affairs Program	Silver Dome Finalist	Extension 720 with Milt Rosenberg
2007	Illinois Broadcasters Association	Best Local Broadcast Team	Silver Dome Finalist	Kathy & Judy
2007	Illinois Broadcasters Association	Best Local Broadcast Team	Silver Dome Finalist	Steve King and Johnnie Putman
2007	Illinois Broadcasters Association	Best Local Broadcast Team	Silver Dome Finalist	Sports Central – David Kaplan and Tom Waddle

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2007	Illinois Broadcasters Association	Best Self-Promotion Use of Other Media	Silver Dome Finalist	The WGN Radio Storm Central TV & Print Ad Promotional Campaign
2007	Illinois Broadcasters Association	Neediest Kids Fund Holiday Campaign	Silver Dome Finalist	Best Community Service Activity
2007	Illinois Broadcasters Association	Best Play-By-Play of a Sporting Event	Silver Dome Finalist	Pat Hughes & Ron Santo, Cubs Baseball
2007	Illinois Broadcasters Association	Best Play-By-Play of a Sporting Event	Silver Dome Finalist	Dave Eanet, Northwestern Football
2007	Illinois Broadcasters Association	Best Local Radio Newscast	Silver Dome Finalist	Andrea Darlas
2007	Illinois Associated Press	Best Reporter	Winner	Judy Pielach
2007	Illinois Associated Press	Best Investigative Series	Winner	““Smack in the Suburbs”, Judy Pielach
2007	Illinois Associated Press	Best Series/Documentary.	Winner	“Huddled Masses”, Steve Bertrand
2007	Illinois Associated Press	Best Newscast	2nd Place	Andrea Darlas
2007	Illinois Associated Press	Best Newscast	2nd Place	Jim Anthony
2007	Illinois Associated Press	Best Hard News Feature	2nd Place	“Farewell to Fields”, Rob Hart
2007	Radio and Television News Directors Association	Edward R. Murrow Award	Winner	“Smack in the Suburbs”, Judy Pielach

<u>Date</u>	<u>Organization</u>	<u>Award</u>	<u>Category/Honor</u>	<u>Entrant/Winner</u>
2007	National Sportscasters and Sportswriters Association	Sportscaster of the Year	Recipient	Pat Hughes