

January 27, 2026

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington DC 20554

Re: Applications to Transfer Control of TEGNA Inc. to Nexstar Media Inc., MB Docket No. 25-331

Dear Chair Carr:

The undersigned consumer protection groups, antitrust groups, public interest organizations, labor unions, and civil rights organizations submit this letter to express our support for the Petition to Deny filed by Free Press, Communications Workers of America, United Church of Christ Media Justice Ministry, and Public Knowledge¹ opposing the proposed merger of Nexstar and TEGNA. The proposed transaction would cause incredibly high levels of concentration in local TV markets, would raise cable and satellite prices around the country, would cause irreparable harm to local news and consumers and would be contrary to the public interest.

I. The FCC does not have the authority to permit this merger: the proposed transaction would violate Congressionally mandated ownership limits.

Most important, as described in the Petition, the Commission does not have the authority to approve this merger. The proposed transaction violates the national TV audience reach limit of 39 percent set by Congress. Nexstar therefore may not acquire TEGNA's stations in any of the 17 local TV markets where Nexstar does not currently operate. Though Nexstar and TEGNA seek a waiver of this limit, the Commission is prohibited by law from waiving, altering, or eliminating this National Cap. The Commission should immediately deny that waiver request and deny the application in full.

II. The proposed transaction would create incredibly high levels of concentration in local markets, cause higher costs for consumers, and is contrary to the public interest.

In addition to requesting waiver of the national cap, the Applicants also seek, in 23 local markets, waivers of the Local TV Multiple Ownership rule - which prohibits a single entity from owning more than two full-power TV stations in a single market. A post-merger Nexstar would control half or more of the commercial stations airing English-language news in numerous markets, and as many as four local TV stations in some markets.

If the Commission were to grant these transfer requests, Nexstar would control a large portion of the local television advertising revenues, local TV news production and broadcast labor markets,

¹ Petition to Deny of Free Press, National Association of Broadcast Employees and Technicians - Communications Workers of America, The NewsGuild - Communications Workers of America, United Church of Christ Media Justice Ministry, Public Knowledge, MB 25-331, December 31, 2025, <https://www.fcc.gov/ecfs/search/search-filings/filing/101010743501692>.

and local TV news viewing audience. It would also be able to leverage its footprint to charge more in retransmission consent, the fees cable and satellite operators must pay to carry local TV stations, thus increasing cable and satellite subscription costs for everyday consumers. Because of the tremendous damage to consumers and anticompetitive harms across the country, the Commission should not grant these waivers and should deny the license transfer requests in all of the overlapping local TV markets.

III. The proposed transaction would cause irreparable harm to local news and newsroom jobs.

Communities will be harmed by the loss of broadcast competition, diminished localism, and decreased viewpoint diversity, particularly via harm to local news. Local news is made by workers who already face a consolidated labor market with few employers. If the transaction is approved, Nexstar will cut jobs and further degrade workers' bargaining power while reducing the output and quality of original local news. There's no evidence to suggest that the creation of massive news- and broadcast-media cartels improves journalism or safeguards a free press. In fact, the opposite appears to be true. Recent analysis of the 35 largest media companies in the United States finds a pervasive pattern of editorial compromise and capitulation as owners of massive media conglomerates seek to curry favor with political leadership.² The suspension of "Jimmy Kimmel Live!" following Nexstar's announcement that it would preempt the show demonstrates the dangers of media capitulation and consolidated ownership. This merger will damage local TV news across the country at a time when the reliability, accuracy and independence of local TV news matters more than ever.

We urge the Commission to reject the proposed acquisition and uphold its obligation to promote competition, localism and diversity in the U.S. media. Allowing for even more media consolidation poses too great a risk to our democracy, and to the free press on which it depends.

Sincerely,

AFT

American Economic Liberties Project

Asian Americans Advancing Justice - AAJC

Asian and Pacific Islander American Vote (APIAVote)

Center for Journalism & Liberty at Open Markets Institute

Committee for the First Amendment

Common Cause

Fourth Branch Action

Get Free

² Free Press, *A More Perfect Media: Saving America's Fourth Estate from Billionaires, Broligarchy and Trump*, (July 29, 2025).

Hispanic Federation

HTTP

Indivisible

Japanese American Citizens League

Local Independent Online News Publishers

MANA, A National Latina Organization

Media and Democracy Project

Multicultural Media Telecom & Internet Council

NAACP

National Coalition on Black Civic Participation

National Council of Asian Pacific Americans (NCAPA)

National Council of Negro Women (NCNW)

National Hispanic Media Coalition

National Urban League

OCA-Asian Pacific American Advocates

Public Citizen

SAG-AFTRA

Writers Guild of America East

Writers Guild of America West