

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

)	
In the Matter of)	
)	
Application of Sinclair Broadcast)	MB Docket No. 17-179
Group, Inc. and Tribune Media Company)	
For Consent to Assign or Transfer)	
Control of Licenses and Authorizations)	
)	

PETITION TO DENY DIVESTITURE APPLICATIONS

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INTRODUCTION AND EXECUTIVE SUMMARY

Free Press, pursuant to Sections 309(d) and 310(d) of the Communications Act (the “Act”), 47 U.S.C. §§ 309(d), 310(d), and 47 C.F.R. § 73.3584, petitions the Federal Communications Commission (“FCC” or “Commission”) to deny the assignment of licenses from Tribune Media Company (“Tribune”) to Sinclair Broadcast Group, Inc. (“Sinclair”) (together, “Applicants”).¹ This Petition to Deny the Applicants’ Divestiture Applications complements Free Press’s initial petition to deny and our reply filed in the above-captioned docket in 2017²; and it is submitted in response to the Commission’s Public Notice in this same docket, released on May 21, 2018, setting forth procedures for filing petitions to deny the Divestiture Applications.³

¹ Free Press seeks denial of the transfer of all licenses subject to this proceeding, File Nos. BTCCDT-20170626AGH; BTCCDT-20170626AGL; BTCCDT-20170626AGO; BTCCDT-20170626AFZ; BTCCDT-20170626AGA; BTCCDT-20170626AGB; BTCCDT-20170626AGC; BTCCDT-20170626AFH; BTCCDT-20170626AFI; BTCCDT-20170626AFP; BTCCDT-20170626AFO; BTCCDT-20170626AFN; BTCCDT-20170626AFM; BTCCDT-20170626AFL; BTCCDT-20170626AFK; BTCCDT-20170626AFJ; BTCCDT-20170626AFT; BTCCDT-20170626AFY; BTCCDT-20170626AGF; BTCCDT-20170626AGP; BTCCDT-20170626AGI; BTCCDT-20170626AGN; BTCCDT-20170626AGM; BTCCDT-20170626ADY; BTCCDT-20170626ADZ; BTCCDT-20170626AFR; BTCCDT-20170626AFR; BTCCDT-20170626AFU; BTCCDT-20170626AFV; BTCCDT-20170626AFW; BTCCDT-20170626AEM; BTCCDT-20170626AFF; BTCCDT-20170626AFE; BTCCDT-20170626AFD; BTCCDT-20170626AFC; BTCCDT-20170626AFB; BTCCDT-20170626AFA; BTCCDT-20170626AEZ; BTCCDT-20170626AEY; BTCCDT-20170626AEX; BTCCDT-20170626AEW; BTCCDT-20170626AEV; BTCCDT-20170626AEU; BTCCDT-20170626AET; BTCCDT-20170626AES; BTCCDT-20170626AER; BTCCDT-20170626AEQ; BTCCDT-20170626AEP; BTCCDT-20170626AEO; BTCCDT-20170626AEN; BTCCDT-20170626AEL; BTCCDT-20170626AGQ; BTCCDT-20170626AGR; BTCCDT-20170626AGS; BTCCDT-20170626AGT; BTCCDT-20170626AGU; BTCCDT-20170626AGV; BTCCDT-20170626AGW; BTCCDT-20170626AGX; BTCCDT-20170626AEF; BTCCDT-20170626AEE; BTCCDT-20170626AFQ; BTCCDT-20170626AGJ; BTCCDT-20170626AEG; BTCCDT-20170626AGD; BTCCDT-20170626AGE; BTCCDT-20170626AEA; BTCCDT-20170626AEB; BTCCDT-20170626AFG; BTCCDT-20170626AGK; BTCCDT-20170626AGG; BTCCDT-20170626AFX; BTCCDT-20170626AEK; BTCCDT-20170626ADX; BTCCDT-20170626AED; BTCCDT-20170626AGY; BTCCDT-20170626AEC; BTCCDT-20170626AEH; BTCCDT-20170626AEJ; BTCCDT-20170626AEI.

² See generally Petition to Deny of Free Press, MB Docket No. 17-179 (Aug. 7, 2017) (“Free Press Initial Petition”). Free Press additionally filed a Reply to Consolidated Opposition during the first pleading cycle: Reply to Consolidated Opposition, MB Docket No. 17-179 (Aug. 29, 2017) (“Free Press Reply”).

³ See *Media Bureau Establishes Consolidated Pleading Cycle for Amendments to the June 26, 2017 Applications*, MB Docket No. 17-179, Public Notice, DA 18-530 (rel. May 21, 2018).

Sinclair is a nationwide television broadcasting company that owns and operates a total of 191 broadcast television stations in 89 markets.⁴ On May 8, 2017, Sinclair announced that it had entered into an agreement to acquire Tribune for \$3.9 billion, with a total transaction value of more than \$6.7 billion including the debt value assumed. This agreement would transfer to Sinclair 42 television stations in 33 markets, as well as WGN America, WGN Radio, and a 31 percent stake in Food Network. Free Press filed a Petition to Deny the transaction on the basis of extensive media ownership rule violations and impending public interest harms.⁵ The Applicants filed amendments to the original applications on April 24, 2018, and again on May 14, 2018, including a new set of applications seeking permission to divest certain stations to third parties.⁶

If the Commission approves these transfers and divestitures, Sinclair would still become the largest broadcaster in the country, owning, operating, programming, and/or providing sales services to 215 television stations in 102 markets, including 35 of the top 50 markets. In eleven of those markets, Sinclair would own or operate two, three, or even four stations in combinations that the Local Television Multiple Ownership Rule (“duopoly rule”) would prohibit under certain circumstances, even if the Commission succeeds in re-shaping and gutting that rule.⁷

⁴ See Sinclair Broadcast Group Inc., Form 10-Q Quarterly Report at 10 (May 10, 2018) (“Sinclair 10-Q”) http://sbgi.ir.edgar-online.com/fetchFilingFrameset.aspx?FilingID=12745658&Type=HTML&filename=SINCLAIR_BROADCAST_GROUP_INC_10Q_20180510.

⁵ See generally Free Press Initial Petition; Free Press Reply.

⁶ File Nos. BALCDT-20180430ACV; BALCDT-20180426ABR; BALCDT-20180426ABQ; BALCDT-20180430ADA; BALCDT-20180430ACY; BALCDT-20180430ACU; BALCDT-20180514ABW; BALCDT-20180514ABC; BALCDT-20180514AAU; BALCDT-20180514ABB; BALCDT-20180514ABA; BALCDT-20180514ABF; BALCDT-20180514AAZ; BALCDT-20180514ABD; BALCDT-20180514ABE; BALCDT-20180426ABP; BALCDT-20180427ABL; BALCDT-20180427ABM; BALCDT-20180430ADB; BALCDT-20180430ACX; BALCDT-20180227ABD; BTCCDT-20180514ABV.

⁷ See 47 C.F.R. § 73.3555(b).

Overall, Sinclair’s owned-station footprint would expand to reach 58.8 percent of U.S. television households⁸ – rising to 66.3 percent when counting the reach of nominally divested sidecar stations over which Sinclair would exert *de facto* control.⁹ The National Television Multiple Ownership Rule (“national audience reach cap”) expressly forbids combinations that result in any broadcaster reaching more than 39 percent of such households nationally.¹⁰ Sinclair relies on the technically-obsolete UHF discount to adjust its national cap calculation to 37.4 percent,¹¹ despite the very real possibility that the D.C. Circuit will overturn the Commission’s unsupportable decision to exhume the UHF discount from its deserved regulatory grave. Additionally, were Sinclair’s sidecar stations and shell companies included in its national reach calculations, even the UHF discount figure rises to an unacceptable 41.1 percent.

Moreover, the proposed divestitures fail to mitigate the serious public interest harms Free Press and other Petitioners identified in the first pleading cycle.¹² Sinclair once again abuses sharing agreements and other shady arrangements with subsidiary sidecar companies to maintain functional control over violative station combinations, and in a newly-deceptive twist, to hide the actual extent of the broadcaster’s national reach. The Applicants also rely heavily on a series of ill-advised decisions the Commission recently made to slash media ownership protections. The

⁸ See *Applications of Tribune Media Company and Sinclair Broadcast Group for Consent to Transfer Control of Licenses and Authorizations*, Amended Comprehensive Exhibit, Amendment to FCC Form 315, at Exhibit J National Ownership Calculation (April 24, 2018) (“April Comprehensive Exhibit”).

⁹ All Free Press calculations use the Nielsen 2017-2018 Local Television Market Universe Ranking to determine percentage of household share for specific DMAs.

¹⁰ See 47 C.F.R. § 73.3555(e).

¹¹ See April Comprehensive Exhibit at Exhibit J; Press Release, Sinclair Broadcast Group Inc., “Sinclair Provides Additional Information About Agreements to Sell TV Stations Related To Closing Tribune Media Acquisition” (May 9, 2018) (“May Amendment Announcement”), <http://sbgnet.com/wp-content/uploads/2018/05/Divestitures-Announcement-FINAL.pdf>.

¹² See Free Press Initial Petition at 20-26; Petition to Deny of Public Knowledge, Common Cause, and United Church of Christ OC, Inc., MB Docket No. 17-179, at 3-7 (Aug. 7, 2017); Petition to Deny of Dish Network LLC, MB Docket No. 17-179, at 45-65 (Aug. 7, 2017); Petition to Deny of American Cable Association, MB Docket No. 17-179, at 13-20 (Aug. 7, 2017).

proposed transaction violates the spirit and the letter of the Commission's rules, and would do permanent harm to broadcast competition, diversity and localism.

I. Statement of Interest

Free Press is a national, nonpartisan organization working to reform the media, to increase public participation in crucial media and telecommunications policy debates, and to foster policies that will produce a more competitive, equitable and public-interest-oriented media ecosystem. Free Press is the largest media reform organization in the United States, with more than 1.4 million activists and members nationwide.

Since its inception, a core component of Free Press' mission has been to promote diverse and independent media ownership, and to prevent the concentration of media markets and the harms that flow therefrom. Free Press has participated extensively in media ownership proceedings at the Commission, including the 2014 Quadrennial Media Ownership Review, previous quadrennial reviews and litigation stemming from them, and several broadcast television license transfer proceedings prior to this transaction. Free Press similarly filed an initial Petition to Deny ("Initial Petition") and Reply to Consolidated Opposition during the first pleading cycle addressing the instant transaction. In each proceeding, Free Press has advocated for policies that promote competition, diversity, and localism to serve the public interest. As such, Free Press constitutes a "party in interest" within the meaning of Section 309(d) of the Communications Act, as amended, and has standing to participate in this proceeding.

As demonstrated herein and in the attached declarations, originally filed with our Initial Petition, Free Press has members and constituents that reside in the areas served by television

stations subject to this Petition.¹³ Additionally, nearly 60,000 Free Press members have signed an online petition opposing the Sinclair-Tribune merger. Grant of permission for the assignment of these licenses would harm Free Press, along with its members and constituents, by causing a permanent loss of diversity of viewpoints available to their communities, a permanent decrease in competition in local news, and a variety of related harms to diversity of ownership and localism in news coverage.

II. Sinclair's Acquisition of Tribune Would Not Serve the Public Interest

As Free Press noted in our Initial Petition, Section 310(d) of the Act requires the Commission to determine whether a proposed license transfer will serve the public interest, convenience, and necessity. A critical part of this determination involves assessing whether the transaction complies with the Act and with the Commission's media ownership rules.¹⁴ Sinclair's proposed divestitures are intended to bring the transaction into superficial compliance with the duopoly rule, and into temporary nominal compliance with the congressionally mandated national audience reach cap (pending the D.C. Circuit decision on the Commission's nonsensical reinstatement of the obsolete UHF discount). But as with the entire proposed transaction, the divestitures likewise violate the spirit and the letter of the Commission's rules by making abundant use of obsolete regulatory loopholes and deceptive shell games. Even should the Commission mistakenly decide to accept these bad-faith efforts as sufficient rule compliance, the Applicants still fail to demonstrate any affirmative public interest benefits to counter the obvious

¹³ See Declarations of Craig Aaron, Mary Tuma, Stephen Barker, James Rinnert, Denis Moynihan, Anthony Shawcross, Julie Kay Johnson, Russell James Martin, Michele (Shelly) Ann Silver, Weldon Frederick Wooden, Ernesto Aguilar, Nicholas Shoemaker, Thomas H. Klammer, Susan Lacerda Stupy, Meg Amelia Riley, Henry Fernandez, Manolia Charlotin, Andrew Glass, Joann Hill, Rosalind Schneider, Jonathan Rintels, Desiree Hill, Steven P. Hunt, Hannah Jane Sassaman, Christine Quigley, Mary Kathryn Taylor, Sue Wilson, William Steven Child, Steve Gevurtz, Seena Seward, Bev Hovda, and Ken Hovda (attached as Exhibit A).

¹⁴ See 47 U.S.C. § 310(d).

threats this massive consolidation poses to local news coverage generally and to viewers in communities of color specifically.

A. The Proposed Divestitures Fail to Eliminate Harms of Overlap Markets

In our initial Petition to Deny, Free Press explained the serious harms that must inevitably result from the Applicants’ proposal to transfer stations serving a dozen “overlap markets,” in which both Tribune and Sinclair currently own or operate local television stations. We noted that ownership of multiple local television stations within the same media market “would subject the impacted communities to diminished competition resulting from a reduction in the number of independent broadcast voices – an outcome that both Republican- and Democratic-led Commissions have recognized as harmful to the public interest.”¹⁵ When we consider that people of color and low-income families over-index as broadcast television viewers, it’s clear that these communities are bearing the brunt of the harms caused by the waves of newsroom closures and job cuts that have come hand-in-hand with market consolidation.¹⁶ Far from resulting in “more news,” as Sinclair repeatedly claims, multi-station combinations in a single market lead to fewer stations producing original news, and more stations rebroadcasting the same cookie-cutter programming handed down from Sinclair’s corporate headquarters.¹⁷ In fact, a recent Emory University study found that local news stations bought by Sinclair noticeably decreased their local political news coverage and took on a more extreme right-leaning political slant – often by wedging “must-run” propagandistic content into local newscasts and forcing robotic corporate scripts into the mouths of local reporters.¹⁸

¹⁵ Free Press Initial Petition at 9.

¹⁶ *See id.* at 21.

¹⁷ *See id.* at 22.

¹⁸ *See Ex Parte* of Free Press, MB Docket No. 17-179 at 2 (Apr. 17, 2018) (“Free Press *Ex Parte*”).

The Commission’s duopoly rule was intended to curtail those harms by preventing such disastrous and anti-competitive broadcast combinations. This purpose is still a vital one, even after the Commission’s recent mistaken actions to undercut the duopoly rule at the expense of local communities. On November 16, 2017, this Commission voted to eliminate the Eight Voices Test which barred any combinations that would reduce the number of independent broadcast voices to fewer than eight competitors, and also voted to allow Top Four station duopoly combinations on a case-by-case basis.¹⁹ These ill-advised changes smoothed the way for big broadcasters like Sinclair to gobble up even more of their erstwhile competitors and what little remains of competition and diversity in local broadcast markets, and they cleared the way for Sinclair’s dystopian vision of the industry consolidating down “to two or three large broadcasters, and really just one to two strong local players in each market.”²⁰

Free Press, Common Cause, National Association of Broadcast Employees and Technicians-Communications Workers of America, and the United Church of Christ Office of Communication, Inc. sued the Commission to reinstate the media ownership duopoly protections, which the communities that broadcasters are licensed to serve rely on to ensure they have access to a variety of independent voices instead of a handful of consolidated corporate monoliths.²¹ Approving this transaction on the basis of dramatically weakened local ownership rules currently under litigation would be a serious affront to the public interest. Additionally, it

¹⁹ *In the Matter of 2014 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*, MB Docket No. 14-50, Order on Reconsideration and Notice of Proposed Rulemaking, FCC 17-156, ¶ 66 (2017).

²⁰ Transcript of Sinclair Broadcast Group Q2 Earnings Call (Aug. 2, 2017), <https://seekingalpha.com/article/4093745-sinclair-broadcast-group-sbgi-q2-2017-results-earnings-call-transcript?part=single>.

²¹ See generally Petition for Review, Free Press *et al.* v. FCC, No. 18-1072 (D.C. Cir. Mar. 9, 2018). That petition for review was consolidated with a similar challenge filed in the Third Circuit by Prometheus Radio Project and Media Mobilizing Project.

would raise further questions of an improper relationship between Commission officials and the Applicants.²² The Commission should postpone its decision regarding this transaction until after its hasty and misguided cuts to local ownership rules are settled in the courts. Rushing to approve an unprecedented merger – only made possible, in its present form, by highly-disputed rule changes still under appellate review – is entirely unnecessary.

Yet Sinclair denied any need to comply even with these greatly relaxed local ownership rules in the original applications,²³ and its President and CEO Chris Ripley reiterated that willfully ignorant argument with the broadcaster’s May 9 amendment announcement, disclaiming the proposed divestitures with the statement: “While we continue to believe that we had a strong and supportable rationale for not having to divest stations, we are happy to announce this significant step forward.”²⁴

Sinclair has done the absolute bare minimum of half-acknowledging the need for divestitures in most of the markets where this combination would blatantly violate the duopoly rule. The proposed divestitures are, as we predicted, nothing more than a sham stitched together by reliance on shell games and loopholes.

In five markets, Sinclair proposes to “divest” stations to known sidecar corporations Howard Stirk Holdings (“HSH”) and Cunningham Broadcasting (“Cunningham”), using a suite of sharing agreements and sale options that allow Sinclair to maintain *de facto* control of these

²² Cecilia Kang, “F.C.C. Watchdog Looks Into Changes That Benefited Sinclair,” *New York Times* (“By the end of the year, in a previously undisclosed move, the top internal watchdog for the F.C.C. opened an investigation into whether Mr. Pai and his aides had improperly pushed for the rule changes and whether they had timed them to benefit Sinclair”) (Feb. 15, 2018), <https://www.nytimes.com/2018/02/15/technology/fcc-sinclair-ajit-pai.html>.

²³ See *Applications of Tribune Media Company and Sinclair Broadcast Group for Consent to Transfer Control of Licenses and Authorizations*, Comprehensive Exhibit, FCC Form 315, at 12 (June 28, 2017).

²⁴ See May Amendment Announcement.

stations.²⁵ Salt Lake City represents one of the most dramatic examples: If the instant transaction and new divestiture proposals were approved, Sinclair would own both KUTV(TV) and KJZZ-TV outright, plus operate both KMYU-TV (a newly proposed divestiture to HSH) and KENV-DT (an existing Cunningham station) through sharing agreements, giving Sinclair control of four local television stations in a single market.

This strategy is so old that Free Press finds itself disappointed not only by Sinclair’s utter lack of concern for its public interest obligations, but also by its shamelessness. As Free Press has noted time and time again, both HSH and Cunningham are legal subsidiaries of Sinclair according to the Securities Exchange Commission (“SEC”).²⁶ Sinclair lists 28 percent of HSH-owned stations and 72 percent of Cunningham-owned stations as Sinclair properties on its own website.²⁷ Every single Cunningham-owned station prior to this divestiture proposal has maintained a sharing agreement of some variety with a local Sinclair station.²⁸

What’s more, the divested stations in this transaction are being nominally sold to sidecars at well below-market price – as little as one-tenth the fair market price, in fact²⁹ – despite the fact

²⁵ Applicants propose to divest KUNS-TV in Seattle-Tacoma, KMYU-TV in Salt Lake City, and KAUT-TV in Oklahoma City to Howard Stirk Holdings in order to comply with the duopoly rule (File Nos. BALCDT-20180426ABR; BALCDT-20180426ABQ; BALCDT-20180426ABP). Applicants also propose to divest KDAF(TV) in Dallas and KIAH(TV) in Houston to Cunningham Broadcasting in order to comply with the national audience reach cap (File Nos. BALCDT-20180427ABL; BALCDT-20180427ABM), discussed more extensively below.

²⁶ See S. Derek Turner, Free Press, *Cease to Resist: How the FCC’s Failure to Enforce its Rules Created a New Wave of Media Consolidation*, at 5 (2014) (“[U]nder Securities Exchange Commission rules, Cunningham, Deerfield and Howard Stirk are considered the same company as Sinclair, which ‘has the power to direct the activities’ of these companies that ‘most significantly impact [the sidecar company’s] economic performance.’”), http://www.freepress.net/sites/default/files/resources/Cease_to_Resist_March_2014_Update.pdf.

²⁷ See generally Sinclair Broadcast Group, “TV Stations,” <http://sbgi.net/tv-stations/>.

²⁸ See generally Cunningham Broadcasting Corporation, “Our Stations,” <http://cunninghambroadcasting.com/our-stations/>.

²⁹ Jason Schwartz, “Armstrong Williams got ‘sweetheart’ deal from Sinclair,” *Politico* (June 13, 2018) (“Williams is acquiring the three stations — in Seattle, Salt Lake City and Oklahoma City — for \$4.95 million. That’s some \$45 million to \$55 million less than what Justin Nielson, a senior research analyst who tracks the broadcast sector for the data and research firm Kagan, said he would have expected.”), <https://www.politico.com/story/2018/06/13/sinclair-broadcasting-armstrong-williams-642997>.

that Sinclair would also assume \$2.7 billion more in debt pre-divestiture if this transaction were approved, resulting in a 69 percent increase in the company's debt burden.³⁰ Lowballing its own assets in this manner can only be understood once one remembers that Sinclair earns massive revenues from these sidecar stations, which qualify as variable interest entities for which Sinclair is considered a "primary beneficiary."³¹ For example, Sinclair earned \$37.6 million in consolidated revenues in Q1 of 2018 from its arrangements with Cunningham alone.³² As former Commission Chairman Tom Wheeler explained, these sham divestitures "require the suspension of regulatory disbelief.... It borders on a regulatory fraud."³³ By supposedly divesting violative duopoly stations to HSH or Cunningham, Sinclair is proposing to transfer the relevant stations from its metaphorical right hand to its left hand, and calling this farce diverse ownership.

Applicants' also exploit sharing agreements with Tribune's existing sidecar company, Dreamcatcher.³⁴ While Sinclair acknowledges its *de facto* ownership of three stations in the Wilkes Barre-Scranton-Hazleton market and proposes to dissolve the suite of sharing agreements it uses to maintain that control,³⁵ it plans to flout the spirit of the rules blatantly and retain control of three local stations in the Norfolk-Portsmouth-Newport News market, including two stations currently owned by Dreamcatcher and operated by Tribune.³⁶ Owning and operating a total of

³⁰ Matt Hogan, "Sinclair Broadcast Group's Breaking News: 40% Upside," *Benzinga* (Apr. 30, 2018), <https://www.benzinga.com/markets/18/04/11604306/sinclair-broadcast-groups-breaking-news-40-upside>.

³¹ See Sinclair 10-Q at 11-12.

³² *Id.* at 23.

³³ Margaret Harding McGill, "'It borders on a regulatory fraud'," *Politico* (May 30, 2018), <https://www.politico.com/story/2018/05/30/sinclair-layoffs-broadcast-stations-553028>.

³⁴ Free Press Initial Petition at 11 ("In filings to the SEC, Tribune acknowledges that Dreamcatcher is an 'entity formed in 2013 specifically to comply with FCC cross-ownership rules related to the Local TV Acquisition.'"); Free Press Reply at 6-7.

³⁵ April Comprehensive Exhibit at 20. It's worth noting that Sinclair will maintain the sharing agreement with Dreamcatcher-owned station WNEP-TV.

³⁶ *Id.*

three stations in a single market clearly violates the Commission’s duopoly rule, but Applicants offer no proposal for remediation or divestiture.

Applicants’ supposed divestiture proposal for the St. Louis market is also ripe for abuse. In a bout of convenient indecision, Sinclair proposes to spin off both KDNL-TV and KPLR-TV into a trust, later to regain ownership of one of the two stations depending on business negotiations – but ignores the fact that unless Sinclair divests KPLR-TV, it will be in possession of an impermissible Top Four duopoly combination in the St. Louis market.³⁷ In the past, Sinclair has manipulated such postponed divestitures to wind up divesting no stations at all, creating impermissible duopoly combinations in direct contravention of the Commission’s orders.³⁸

To avoid creating such impermissible duopolies in both Seattle-Tacoma and Salt Lake City, Sinclair has filed applications to transfer ownership of one Top Four station in each market to Fox Broadcasting Company (“Fox”).³⁹ However, if approved, the purchase of these two stations alone would put Fox in violation of the national audience reach cap by bumping its reach to 39.9 percent of U.S. television households (26.8 percent with the antiquated UHF discount).⁴⁰ In combination with the five other stations Sinclair plans to divest to Fox to reduce Sinclair’s national ownership calculation, Fox’s post-deal reach would be 46.3 percent of households (30.6

³⁷ St. Louis Divestiture Trust Comprehensive Exhibit (May 2018) File Nos. BALCDT-20180514ABW; BTCCDT-20180514ABV, https://licensing.fcc.gov/cdbs/CDDBS_Attachment/getattachment.jsp?appn=101784986&qnum=5060©num=1&exhnum=1.

³⁸ See the discussion of Allbritton divestitures in the Free Press Initial Petition at 15-17 and Free Press Reply at 7-9.
³⁹ See Asset Purchase Agreement for the Sale of Television Stations KCPQ, KDVR, KSTU, KSWB-TV, KTXL, WJW, WSFL-TV by and among Sinclair Television Group, Inc., Tribune Media Company and Fox Television Stations, LLC, File Nos. BALCDT-20180514AAU; BALCDT-20180514ABF, https://licensing.fcc.gov/cdbs/CDDBS_Attachment/getattachment.jsp?appn=101784222&qnum=5040©num=1&exhnum=1.

⁴⁰ Fox currently reaches 37.4 percent of television households, 24.7 percent with the UHF discount. With the purchase of KCPQ(TV) in Seattle and KSTU(TV) in Salt Lake City, Fox would reach 39.9 percent of television households, 26.8 percent with the UHF discount.

percent with the UHF discount).⁴¹ In other words, Sinclair plans to escape violating the Commission's rules by aiding another broadcaster to violate those rules and exceed the 39 percent national audience reach cap. This cannot be considered a good faith effort to serve the public interest and comply with the duopoly rule.

Should the Commission mistakenly conclude that these numerous attempts at skirting the duopoly rule do not count as violations due to Sinclair's hand-waving divestitures, it should nonetheless consider the serious public interest harms that these combinations present. The Commission's obligation to evaluate proposed transactions for affirmative public interest benefits before granting approval does not end with an assessment of rule compliance, but must extend to consider the extant impacts on competition, diversity, and localism. By divesting stations to its own "sidecar" shell companies, Sinclair is reducing the number of truly independent competitive voices in local markets, and ensuring that no true competitor could ever buy the station, since in these agreements Sinclair reserves a first sale option for itself. By divesting stations to another massive broadcaster such as Fox, the transaction harms localism by foreclosing opportunities for small local broadcasters to compete with these national conglomerates that pursue a top-down approach to news. Local communities, and particularly communities of color, would see a substantial decline in the diversity and quality of local news coverage airing across multiple channels controlled by the same parent company. These grave harms must take precedence in the Commission's consideration of the transaction.

⁴¹ Applicants propose to divest the following stations to Fox broadcasting: KCPQ(TV) in Seattle, KSTU(TV) in Salt Lake City, WSFL-TV in Miami, KTXL(TV) in Sacramento, WJW(TV) in Cleveland, KSWB-TV in San Diego, and KDVR(TV) along with its satellite KFCT(TV) in Denver.

B. The Proposed Divestitures Fail to Eliminate Harms of National Audience Overreach

As Free Press has articulated in previous filings regarding this Application,⁴² as well as in several media ownership proceedings,⁴³ national overreach of the kind proposed by the Applicants in this transaction would cause serious harm to the public interest. Localism, in particular, must suffer as a result of broadcasters prioritizing economies of scale over the labor-intensive task of producing quality local news in and for each individual community they serve.⁴⁴ Women and people of color have long lagged behind white men in broadcast ownership, and studies have shown that “unrestrained market forces and media ownership consolidation have contributed to the depletion of minority owners.”⁴⁵ Additionally, Sinclair has matched its own inexorable national growth with waves of newsroom layoffs, and built up a paradigm of cookie-cutter news that ignores local issues⁴⁶ and in fact dehumanizes local communities.⁴⁷

The national audience reach cap was designed to curtail these injuries by barring broadcasters from expanding their reach beyond a specified percentage of the national television audience. After several modifications, the national cap was set at 39 percent and enshrined in statute by Congress in 2004.⁴⁸ However the Commission has recently made tremendous efforts to

⁴² See Free Press Initial Petition at 17-19.

⁴³ See Comments of Free Press, *In the Matter of Amendment of Section 73.3555(e) of the Commission’s Rules, National Television Multiple Ownership Rule*, MB Docket No. 17-318, at 8-17 (Mar. 19, 2018) (“Free Press National Cap Comments”).

⁴⁴ See Free Press Initial Petition at 19 (“The Commission has also concluded that a national audience cap is necessary to preserve localism as it ensures that independent local stations can reject national network directives to run cookie-cutter content and air more responsive local programming.”).

⁴⁵ Jeffrey Layne Blevins & Karla Martinez, A Political Economic History of FCC Policy on Minority Broadcast Ownership, 13 *The Communication Review* 216, 231 (2010); S. Derek Turner & Mark Cooper, Free Press, *Out of The Picture 2007: Minority & Female TV Station Ownership in the United States* (Oct. 2007), <https://www.freepress.net/sites/default/files/resources/otp2007.pdf>.

⁴⁶ See generally Free Press *Ex Parte*.

⁴⁷ See Free Press Initial Petition at 23-26.

⁴⁸ See Consolidated Appropriations Act of 2004, Pub. L. No. 108-199, § 629(1), 118 Stat. 3 (2004).

subvert the critical function of the national cap. In 2017, the Commission arbitrarily and capriciously reinstated the technologically obsolete UHF discount, a loophole for which the only purpose in the digital era can be to deliberately underestimate the national audience reach of large broadcasters.⁴⁹ Free Press has challenged this Commission's transparently fact-free decision in court,⁵⁰ and expects the court to overturn it in the near future. Meanwhile, the Commission has opened a rulemaking to consider modifying or eliminating the national cap – despite the fact that the Commission has no statutory authority to do so.⁵¹ In fact, Commissioner O'Rielly has repeatedly argued that only Congress has authority to modify the national ownership cap, both in his statements at the Commission⁵² and public appearances.⁵³

Even with proposed divestitures, the instant transaction would result in a broadcast combination reaching 58.8 percent of the national television audience with its owned stations alone, far exceeding the congressionally mandated 39 percent cap.⁵⁴ Instead of acknowledging this reality, Sinclair chooses to hide behind the flimsy and antiquated UHF discount and insists that its reach will be only 37.4 percent.⁵⁵ As mentioned above, Sinclair only achieves this nominal compliance with the national audience reach cap by selling seven stations to Fox

⁴⁹ See generally *Amendment of Section 73.3555(e) of the Commission's Rules, National Television Multiple Ownership Rule*, MB Docket No. 13-236, Order on Reconsideration, 32 FCC Rcd 3390 (2017).

⁵⁰ See generally Opening Brief for the Petitioners at 30, *Free Press v. FCC*, No. 17-1129 (D.C. Cir. filed Dec. 19, 2017).

⁵¹ See Free Press National Cap Comments at 5-8.

⁵² See *Amendment of Section 73.3555(e) of the Commission's Rules, National Television Multiple Ownership Rule*, MB Docket No. 13-236, Report and Order, 31 FCC Rcd 10213 (2016) (Dissenting Statement of Commissioner O'Rielly); *Amendment of Section 73.355(e) of the Commission's Rules, National Television Multiple Ownership Rule*, MB Docket No. 17-318, Notice of Proposed Rulemaking, 32 FCC Rcd 10785 (2017) (Statement of Commissioner O'Rielly).

⁵³ See Commissioner Michael O'Rielly public speech at Hudson Institute, C-SPAN Recording (Jan. 27, 2014), <https://www.c-span.org/video/?317426-1/fcc-commissioner-orielly-telecommunications-policy>; C-SPAN Interview with Commissioner Michael O'Rielly (July 21, 2015), <https://www.c-span.org/video/?327186-1/communicators-michael-orielly&start=NaN>; C-SPAN Interview with Commissioner Michael O'Rielly (Dec. 13, 2016), <https://www.c-span.org/video/?327186-1/communicators-michael-orielly&start=NaN>.

⁵⁴ See April Comprehensive Exhibit at Exhibit J.

⁵⁵ *Id.*

overall, and in four markets selling them to Fox expressly in an attempt to come under the cap. This series of transactions, when combined with Sinclair's other divestitures, would bring Fox's actual national audience reach to 46.3 percent.⁵⁶ Applicants claim that both broadcasters remain sufficiently under the national cap with the analog-era UHF discount in place.⁵⁷ However the Commission itself acknowledges that there is no technical reason to exhume this irrelevant regulatory antique, and thus it has no sufficient justification for approving a transaction that can only claim compliance with the Commission's rules by relying on the UHF discount.

Incredibly, the UHF discount is not the only loophole Sinclair proposes to abuse in order to skirt the national ownership cap. In Chicago, Sinclair proposes to divest WGN-TV to Steven Fader, a longtime business partner of David Smith, Sinclair's Executive Chairman.⁵⁸ Smith has a controlling interest in and serves on the board of directors for Atlantic Automotive, where Fader is CEO.⁵⁹ Fader's newly-formed shell company owns no other stations, but has agreed to enter WGN into a joint-services agreement, shared services agreement, and first sale option with Sinclair broadcasting.⁶⁰ Since Sinclair owns no other broadcast properties in Chicago, it declines to count WGN for the purposes of its national ownership calculations, but these extensive sharing agreements and business connections with Fader ensure that WGN will be fully controlled by Sinclair.⁶¹ To its investors and the public, Sinclair actually includes Chicago in its national footprint calculations, all the while excluding the station from its calculations at the

⁵⁶ Applicants propose divestitures to Fox in four markets specifically to comply with the national ownership cap: Miami, Sacramento, Cleveland and San Diego.

⁵⁷ With the inappropriately resurrected UHF discount applied, Sinclair would reach 37.4 percent of households and Fox would reach 30.1 percent.

⁵⁸ File No. BALCDT-20180227ABD.

⁵⁹ See Sinclair 10-Q at 23.

⁶⁰ See April Comprehensive Exhibit at 20.

⁶¹ *Id.* at Exhibit J.

Commission.⁶² Sinclair continues to talk out of both sides of its mouth, bragging about its *de facto* ownership of sidecar stations only when the Commission isn't looking. The Commission should not fall for such an explicit and conscious deception.

In addition to the Chicago station, Applicants propose to divest KDAF(TV) in Dallas and KIAH(TV) in Houston to Cunningham Broadcasting in order to comply with the national ownership cap.⁶³ Sinclair limited itself to requiring only a first sale option for these stations instead of its customary suite of sharing agreements – but the Commission should not interpret this uncustomary restraint as independence. As discussed above, Cunningham is so closely related to Sinclair as to be functionally the same company, and Sinclair by any other name is still Sinclair. If the Commission takes a cue from the SEC and rightly considers those stations owned by sidecar Cunningham as attributable to Sinclair, it becomes inescapably apparent that both the Dallas and Houston markets must be included in Sinclair's national cap calculations as well.

With households in Dallas, Houston and Chicago rightly included, Sinclair's national reach rises to 66.3 percent of the U.S. television audience – which works out to a whopping 41.1 percent even with the application of the outdated UHF discount.⁶⁴ Despite Applicants' insincere efforts to effect compliance, the instant transaction even with its new but empty divestiture proposals clearly violates the congressionally-mandated 39 percent national audience reach cap. On that basis alone, the Commission should deny the transaction. The proposed divestitures do

⁶² See May Amendment Announcement (“The combined footprint that will reach 62% of U.S. TV households or 37.4% pursuant to the FCC national ownership cap.”). Notably, this 62 percent figure differs from the 58.77 percent of U.S. television households that Sinclair reported it would reach in its filings with the Commission. Sinclair could only have achieved this 62 percent by adding the Chicago market, which comprises approximately 2.9 percent of television households, to the 58.77 percent reach of only those stations that Sinclair owns outright. Sinclair chose to selectively include its sharing agreements with Chicago's WGN-TV in public figures, but to selectively exclude it from its filings to the Commission used to make its attributable national ownership calculation.

⁶³ File Nos. BALCDT-20180427ABL; BALCDT-20180427ABM.

⁶⁴ With the application of the UHF discount, the addition of Dallas (1.2 percent) and Houston (1.1 percent) to Sinclair's post-divestiture calculation of 37.4 percent audience reach raises that reach to 39.7 percent.

not demonstrate a commitment to comply with the Commission's rules or to serve the public interest, but merely a commitment to continue expanding Sinclair's duplicitous use of sharing agreements to evade the national audience reach cap in addition to the duopoly rule. Regardless of how the Commission majority may try to reinvent math or define away clear financial subsidiary ties, the proposed divestitures do practically nothing to mitigate the overwhelming harms of greenlighting a merger transaction of this size.

CONCLUSION

For the reasons stated above, the divestitures now contemplated as part of this transaction do not serve the public interest. Applicants fail to make an affirmative showing of public interest benefits, and do nothing to refute the harms demonstrated by Free Press and other petitioners. Allowing Sinclair to use shell games and disputed rule changes to expand its control over multiple broadcast stations within individual markets, as well as allowing the combined entity to exceed the statutory national audience reach cap, is an affront to the goals of the Act. As such, the Commission should not approve the license transfers subject to this Petition to Deny.

Respectfully Submitted,

/s/ Dana J. Floberg

Dana J. Floberg
S. Derek Turner
Matthew F. Wood
Free Press
1025 Connecticut Ave NW
Suite 1110
Washington DC, 20036
202-265-1490

June 20, 2018

CERTIFICATE OF SERVICE

I, Dana J. Floberg, certify that on June 20, 2018, the foregoing Petition to Deny was served by electronic mail, on the following:

Mace Rosenstein, mrosenstein@cov.com
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Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

June 20, 2018

/s/ Dana J. Floberg
dfloberg@freepress.net
Policy Analyst
Free Press

EXHIBIT A

DECLARATIONS OF CRAIG AARON, MARY TUMA, STEPHEN BARKER, JAMES RINNERT, DENIS MOYNIHAN, ANTHONY SHAWCROSS, JULIE KAY JOHNSON, RUSSELL JAMES MARTIN, MICHELE (SHELLY) ANN SILVER, WELDON FREDERICK WOODEN, ERNESTO AGUILAR, NICHOLAS SHOEMAKER, THOMAS H. KLAMMER, SUSAN LACERDA STUPY, MEG AMELIA RILEY, HENRY FERNANDEZ, MANOLIA CHARLOTIN, ANDREW GLASS, JOANN HILL, ROSALIND SCHNEIDER, JONATHAN RINTELS, DESIREE HILL, STEVEN P. HUNT, HANNAH JANE SASSAMAN, CHRISTINE QUIGLEY, MARY KATHRYN TAYLOR, SUE WILSON, WILLIAM STEVEN CHILD, STEVE GEVURTZ, SEENA SEWARD, BEV HOVDA, AND KEN HOVDA.

DECLARATION OF FREE PRESS PRESIDENT & CEO CRAIG AARON

1. I, Craig Aaron, am the President and CEO of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. Free Press is the largest media reform organization in the United States, with over a million members and constituents nationwide, including members who reside in each of the 108 markets where Sinclair would own television stations if this transaction were approved. These members will be irreparably harmed by the severe reduction in localism, competition and diversity that this merger would inevitably produce.
3. This Declaration has been prepared in support of the foregoing Petition to Deny.
4. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

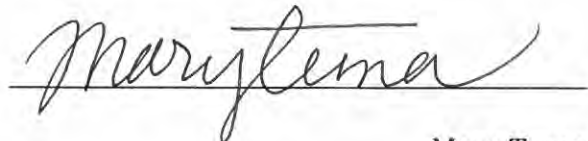
A handwritten signature in black ink, appearing to read 'Craig Aaron', written over a horizontal line.

Craig Aaron

August 3, 2017

DECLARATION OF MARY TUMA

1. I, Mary Tuma, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 1801 Ohlen Rd., Austin, Texas, 78757.
3. I am a regular viewer of the stations serving the Austin, TX market, which includes KEYE-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of Tribune stations across the nation because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Austin area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased national presence would make local news coverage in Austin less responsive to my community's needs. I believe this would significantly reduce the quality and quantity of local news in my area.
5. This Declaration has been prepared in support of the foregoing Petition to Deny.
6. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

A handwritten signature in cursive script that reads "Mary Tuma". The signature is written in black ink and is positioned above a solid horizontal line.

Mary Tuma

July 31, 2017

DECLARATION OF STEPHEN BARKER

1. I, Stephen Barker, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 3000 W. Palmer Blvd., Apt. 1, Chicago, IL 60647.
3. I am a regular viewer of the stations serving the Chicago, IL market, which includes WGN-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of Tribune station WGN-TV because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Chicago area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's new presence in Chicago would make local news coverage less responsive to my community's needs. For example, the *Chicago Business* forecasted major damaging changes to WGN as a result of the proposed transaction. I believe this would significantly reduce the quality and quantity of local news in my area.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Chicago needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

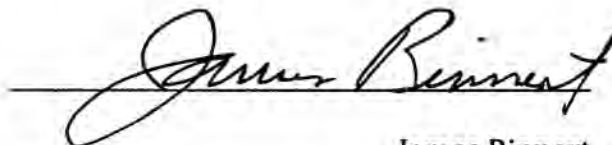


Stephen Barker

August 3, 2017

DECLARATION OF JAMES RINNERT

1. I, James Rinnert, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 1120 W. Fry St., Chicago, Illinois 60642.
3. I am a regular viewer of the stations serving the Chicago, IL market, which includes WGN-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of Tribune station WGN-TV the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Chicago area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Chicago would make local news coverage less responsive to my community's needs, as articulated by a piece in local paper the *Chicago Business* forecasting major damaging changes to WGN as a result of the proposed transaction. I believe this would significantly reduce the quality and quantity of local news in my area.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Chicago needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.




James Rinnert

August 1, 2017

DECLARATION OF DENIS MOYNIHAN

1. I, Denis Moynihan, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 1356 Adams St., Denver CO 80206.
3. I am a regular viewer of the stations serving the Denver, CO market, which includes KDVR, KFCT and KWGN-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the three Tribune stations in my area because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Denver area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's presence in Denver would make local news coverage less responsive to my community's needs. I believe this would significantly reduce the quality and quantity of local news in my area.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Denver needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

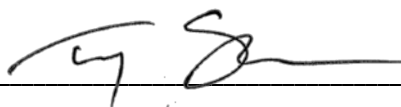


Denis Moynihan

04 August, 2017

DECLARATION OF Anthony Shawcross

1. I, Anthony Shawcross am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 662 Inca St. Denver, CO 80204
3. I am a regular viewer of the stations serving the Denver, CO market, which includes KDVR, KFCT and KWGN-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the three Tribune stations in my area because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Denver area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's presence in Denver would make local news coverage less responsive to my community's needs. I believe this would significantly reduce the quality and quantity of local news in my area.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Denver needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



Anthony Shawcross
Aug 1, 2017

DECLARATION OF Julie Kay Johnson

1. I, Julie Kay Johnson, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 627 17th Ave NW, Apt 7212, Altoona, Iowa 50009.
3. I am a regular viewer of the stations serving the Des Moines-Ames, IA market, which includes KDSM-TV and WHO-DT.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of Tribune station WHO-DT in my area because its common control of the four stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. As local paper the *Des Moines Register* published recently, the proposed acquisition "is bad news for the principles of localism, diversity and competition." I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Des Moines area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Des Moines would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Des Moines needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.


Julie Kay Johnson

August 4, 2017

DECLARATION OF Russell James Martin

1. I, Russell James Martin, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 3520 Kingman Blvd, Des Moines, Iowa, 50311.
3. I am a regular viewer of the stations serving the Des Moines-Ames, IA market, which includes KDSM-TV and WHO-DT.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of Tribune station WHO-DT because its common control of the two stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. As local paper the *Des Moines Register* published on June 29, 2017, the proposed acquisition "is bad news for the principles of localism, diversity and competition." I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Des Moines area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Des Moines would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Des Moines needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



Russell James Martin

August 4, 2017

DECLARATION OF SUPPORT FOR A FREE PRESS

1. I, Michele (Shelly) Ann Silver, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 794 NE 58th Ave, Des Moines, IA 50313.
3. I am a regular viewer of the stations serving the Des Moines-Ames, IA market, which includes KDSM-TV and WHO-DT.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of Tribune station WHO-DT in my area because its common control of the four stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. As local paper the *Des Moines Register* published recently, the proposed acquisition "is bad news for the principles of localism, diversity and competition." I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Des Moines area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Des Moines would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Des Moines needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.


Michele (Shelly) Ann Silver

August 5, 2017

DECLARATION OF WELDON FREDERICK WOODEN

1. I, Weldon Frederick Wooden, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 253 Madison Ave SE, Grand Rapids MI 49503.
3. I am a regular viewer of the stations serving the Grand Rapids-Kalamazoo-Battle Creek, MI market, which includes WWMT and WXMI.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of Tribune station WXMI because its common control of the two stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Grand Rapids area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Grand Rapids would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Grand Rapids needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



Weldon Frederick Wooden

31 July 2017

DECLARATION OF ERNESTO AGUILAR

1. I, Ernesto Aguilar, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 1341 Castle Court, Houston, TX 77006.
3. I am a regular viewer of the stations serving the Houston, TX market, which includes KIAH.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of Tribune station KIAH because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Houston area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's new presence in Houston would make local news coverage less responsive to my community's needs. I believe this would significantly reduce the quality and quantity of local news in my area.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Houston needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



Ernesto Aguilar

August 1, 2017

DECLARATION OF NICHOLAS SHOEMAKER

1. I, NICHOLAS SHOEMAKER, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 14886 REDCLIFF DR, NOBLESVILLE, INDIANA 46062.
3. I am a regular viewer of the stations serving the Indianapolis, IN market, which includes WTTK, WTTV and WXIN.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations in my area because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Indianapolis area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's new presence in Indianapolis would make local news coverage less responsive to my community's needs. I believe this would significantly reduce the quality and quantity of local news in my area.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Indianapolis needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

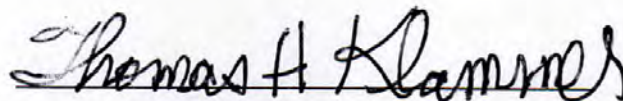


NICHOLAS SHOEMAKER

3 AUGUST, 2017

DECLARATION OF THOMAS H. KLAMMER

1. I, Thomas H. Klammer, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 5815 Oak Street, Kansas City, MO 64113.
3. I am a regular viewer of the stations serving the Kansas City, MO-KS market, which includes WDAF-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of WDAF-TV because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Kansas City area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's new presence in Kansas City would make local news coverage less responsive to my community's needs.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Kansas City needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



Thomas H. Klammer

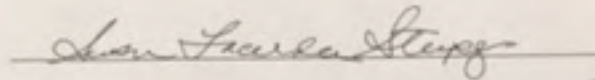
July 31, 2017

DECLARATION OF SUSAN LACERDA STUPY

1. I, Susan Lacerda Stupy, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 2881 Inverness Drive, Los Alamitos, CA 90720.
3. I am a regular viewer of the stations serving the Los Angeles market, including Tribune-owned KTLA. KTLA is my favorite morning news program.
4. I, and other viewers like me, will be harmed by Sinclair's acquisition of KTLA because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Los Angeles area. Local news is not local if dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Los Angeles would make local news coverage less responsive to my community's needs.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Los Angeles needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.

6. This Declaration has been prepared in support of the foregoing Petition to Deny.

7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

A handwritten signature in cursive script, reading "Susan Lacerda Stupy", is written over a horizontal line.

Susan Lacerda Stupy

July 28, 2017

DECLARATION OF MEG AMELIA RILEY

1. I, Meg Amelia Riley, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 5501 Shoreview Avenue, Minneapolis, MN 55417.
3. I am a regular viewer of the stations serving the Minneapolis-St. Paul, MN market, which includes WUCW.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations across the nation because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Minneapolis-St. Paul area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased national presence would make local news coverage in Minneapolis-St. Paul less responsive to my community's needs. I believe this would significantly reduce the quality and quantity of local news in my area.
5. This Declaration has been prepared in support of the foregoing Petition to Deny.
6. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



Meg Amelia Riley

July 31, 2017

DECLARATION OF HENRY FERNANDEZ

1. I, Henry Fernandez, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 89 East Pearl Street, New Haven, Connecticut, 06513.
3. I am a regular viewer of the stations serving the New Haven market, including Tribune-owned WCCT-TV and WTIC-TV.
4. I, and other viewers like me, will be harmed by Sinclair's acquisition of WCCT-TV and WTIC-TV because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the New Haven area. Local news is not local if dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in New Haven would make local news coverage less responsive to my community's needs.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. New Haven needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



Henry Fernandez

August 7, 2017

DECLARATION OF Manolia Charlotin

1. I, Manolia Charlotin, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 22 Halsey St, apt 3B, Brooklyn, NY 11216.
3. I am a regular viewer of the stations serving the New York, NY market, which includes WPIX.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of Tribune station WPIX because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the New York area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's new presence in New York would make local news coverage less responsive to my community's needs. I believe this would significantly reduce the quality and quantity of local news in my area.
5. Furthermore, I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. New York needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

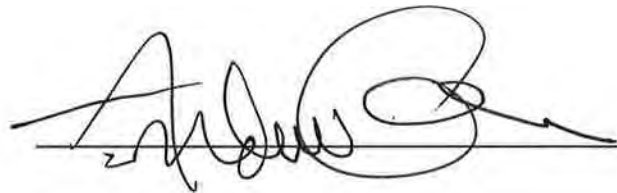
Manolia Charlotin (e-signature)

Manolia Charlotin

August 3, 2017

DECLARATION OF ANDREW GLASS

8. I, Andrew Glass, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
9. I reside at 170 2nd Ave, 6D, New York, NY 10003
10. I am a regular viewer of the stations serving the New York, NY market, which includes WPIX.
11. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations in my area because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the New York area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in New York would make local news coverage less responsive to my community's needs. I believe this would significantly reduce the quality and quantity of local news in my area.
12. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. New York needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
13. This Declaration has been prepared in support of the foregoing Petition to Deny.
14. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

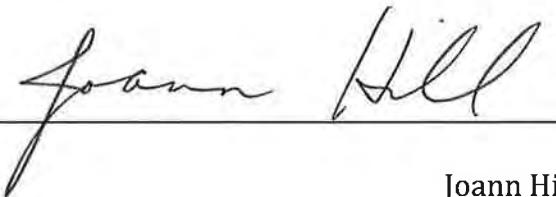
A handwritten signature in black ink, appearing to read 'Andrew Glass', written over a horizontal line.

Andrew Glass

August 1, 2017

DECLARATION OF JOANN HILL

1. I, Joann Hill, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 170 2nd Ave, 6D, New York, NY 10003
3. I am a regular viewer of the stations serving the New York, NY market, which includes WPIX.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations in my area because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the New York area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in New York would make local news coverage less responsive to my community's needs. I believe this would significantly reduce the quality and quantity of local news in my area.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. New York needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



Joann Hill

August 1, 2017

DECLARATION OF ROSALIND SCHNEIDER

1. I, Rosalind Schneider, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 40 Cottontail Lane, Irvington NY 10533
3. I am a regular viewer of the stations serving the New York, NY market, which includes WPIX.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations in my area because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the New York area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in New York would make local news coverage less responsive to my community's needs. I believe this would significantly reduce the quality and quantity of local news in my area.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. New York needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

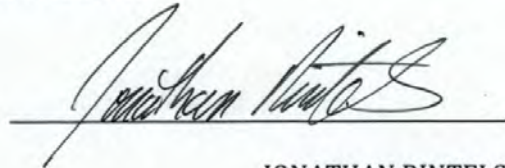


Rosalind Schneider

August 3, 2017

DECLARATION OF JONATHAN RINTELS

1. I, Jonathan Rintels, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 1631 Waterlily Rd, Coinjock, NC 27923.
3. I am a regular viewer of the stations serving the Norfolk-Portsmouth-Newport News, VA market, which includes Sinclair-owned WTVZ-TV and Tribune subsidiary-owned WGNT and WTKR.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of WGNT and WTKR because its common control of the three stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Norfolk area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Norfolk would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Norfolk needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



JONATHAN RINTELS

August 1, 2017

DECLARATION OF Desiree Hill

1. I, [^{Desiree Hill} full-name], am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at [^{804 NW 39th St. Oklahoma City OK 73118} home-address].
3. I am a regular viewer of the stations serving the Oklahoma City, OK market, which includes KOCB, KOKH-TV, KAUT-TV and KFOR-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations in my area because its common control of the four stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Oklahoma City area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe

Sinclair's increased presence in Oklahoma City would make local news coverage less responsive to my community's needs.

6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Oklahoma City needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

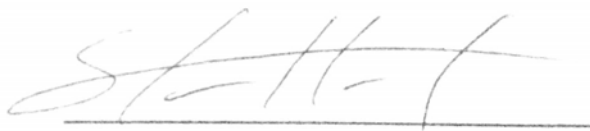
Desiree Hill

Desiree Hill

August 3, 2017

DECLARATION OF SUPPORT

1. I, Steven P. Hunt, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 6300 Westbrook dr, Oklahoma City, OK 73162.
3. I am a regular viewer of the stations serving the Oklahoma City, OK market, which includes KOCB, KOKH-TV, KAUT-TV and KFOR-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations in my area because its common control of the four stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the [market] area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Oklahoma City would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Oklahoma City needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

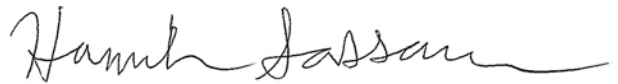


Steven P Hunt

August 3, 2017

DECLARATION OF Hannah Jane Sassaman

1. I, Hannah Jane Sassaman, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 4512 Springfield Avenue, Philadelphia, PA, 19143.
3. I am a regular viewer of the stations serving the Philadelphia market, including Tribune-owned WPHL-TV.
4. I, and others like me, will be harmed by Sinclair's acquisition of WPHL-TV because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Philadelphia area. Local news is not local if dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Philadelphia would make local news coverage less responsive to my community's needs.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Philadelphia needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



Hannah Jane Sassaman

August 1st, 2017

DECLARATION OF CHRISTINE QUIGLEY

1. I, Christine Quigley, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at [4018 N Montana Ave Portland, OR 97227].
3. I am a regular viewer of the stations serving the Portland market, which includes KATU, KRCW-TV and KUNP.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations in my area because its common control of the three stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Portland area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and more recently by laying off two long-term newsroom staffers at KATU in Portland. I believe Sinclair's increased presence in Portland would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Portland needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

Christine Quigley

Christine Quigley

July 28, 2017

DECLARATION OF MARY KATHRYN TAYLOR

1. I, Mary Kathryn Taylor, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 3905 Fish Pond Lane, Glen Allen VA 23060.
3. I am a regular viewer of the stations serving the Richmond-Petersburg, VA market, which includes Sinclair-owned WRLH-TV and Tribune-owned WTVR-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of WTVR-TV because its common control of the two stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Richmond area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Richmond would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Richmond needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.


Mary Kathryn Taylor

August 1, 2017

DECLARATION OF SUE WILSON

1. I, Sue Wilson, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 18125 Tyler Road, Fiddletown, CA.
3. I am a regular viewer of the stations serving the Sacramento-Stockton-Modesto, CA market, which includes KTXL.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of KTXL because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Sacramento area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's presence in Sacramento would make local news coverage less responsive to my community's needs.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Sacramento needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.


A handwritten signature in cursive script, reading "Sue Wilson", written over a horizontal line.

Sue Wilson

August 1, 2017

DECLARATION OF [FULL NAME]

1. I, William Steven Child, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 400 E Capitol Park Av. Salt Lake City, UT 84103.
3. I am a regular viewer of the stations serving the Salt Lake City market, which includes KJZZ-TV, KMYU, KSTU and KUTV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations in my area because its common control of the four stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Salt Lake City area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in Salt Lake City would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. Salt Lake City needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.


[full name]

August 3, 2017

DECLARATION OF Steve Gevurtz

1. I, Steve Gevurtz, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 4190 Mississippi Street, San Diego, CA 92104.
3. I am a regular viewer of the stations serving the San Diego, CA market, which includes Tribune-owned KSWB-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of KSWB-TV because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the San Diego area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in San Diego would make local news coverage less responsive to my community's needs.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. San Diego needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.




[Steve Gevurtz]

8/1/17

DECLARATION OF Seena Seward

1. I, Seena Seward, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 7774 Calle Mejor, Carlsbad, California.
3. I am a regular viewer of the stations serving the San Diego, CA market, which includes Tribune-owned KSWB-TV.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of KSWB-TV because the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the San Diego area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer areas and stations. I believe Sinclair's increased presence in San Diego would make local news coverage less responsive to my community's needs.
5. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically slanted "must-run" commentary. San Diego needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda, such as the extremely biased political segments from former Trump campaign staffer, Boris Epshteyn.
6. This Declaration has been prepared in support of the foregoing Petition to Deny.
7. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.

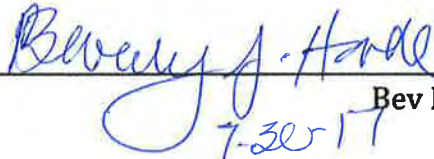


Seena Seward

August 1, 2017

DECLARATION OF BEV HOVDA

1. I, Bev Hovda, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 18605 104th Ave NE, Bothell, WA.
3. I am a regular viewer of the stations serving the Seattle-Tacoma market, which includes KCPQ, KOMO-TV, KUNS-TV and KZJO.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations in my area because its common control of the four stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Seattle metropolitan area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer stations and communities. I believe Sinclair's increased presence in Seattle would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically-slanted "must-run" commentary. Seattle needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda. Recently KOMO-TV in Seattle was forced to air a troubling segment accusing national media of being "fake news" - Sinclair should not be permitted to expand this despicable practice to more local stations in my community.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.


Bev Hovda
7-20-17

July 29th, 2017

DECLARATION OF KEN HOVDA

1. I, Ken Hovda, am a member of Free Press, located at 1025 Connecticut Ave. NW, Suite 1110, Washington, D.C. 20036.
2. I reside at 18605 104th Ave NE, Bothell, WA.
3. I am a regular viewer of the stations serving the Seattle-Tacoma market, which includes KCPQ, KOMO-TV, KUNS-TV and KZJO.
4. I will be, and other viewers like me will be harmed by Sinclair's acquisition of the Tribune stations in my area because its common control of the four stations listed above would reduce the number of independent voices available to my community, in violation of the FCC's local multiple ownership rule. I believe this would significantly reduce the quality and quantity of local news in my area by reducing competition and diminishing Sinclair's incentive to invest in robust local news coverage that serves the public interest.
5. Additionally, the scale of Sinclair's operation would violate the FCC's national audience cap and reduce the broadcaster's attention to the local needs of the Seattle metropolitan area. Local news is not local if it is dictated by corporate managers with no ties to my community, as Sinclair has consistently done by shuttering local newsrooms and consolidating news production in fewer stations and communities. I believe Sinclair's increased presence in Seattle would make local news coverage less responsive to my community's needs.
6. Furthermore I am concerned about Sinclair's practice of forcing its local stations to air politically-slanted "must-run" commentary. Seattle needs real news and information that meets our local needs, not deceptive prepackaged segments that promote Sinclair's corporate political agenda. Recently KOMO-TV in Seattle was forced to air a troubling segment accusing national media of being "fake news" - Sinclair should not be permitted to expand this despicable practice to more local stations in my community.
7. This Declaration has been prepared in support of the foregoing Petition to Deny.
8. This statement is true to my personal knowledge, and is made under penalty of perjury of the laws of the United States of America.



Ken Hovda

July 28th, 2017