Before the FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, DC 20554

In the Matter of Applications for Renewal of Station License of

WBBM-TV, Chicago, IL)	BRCT20050801AFV
WMAQ-TV, Chicago, IL)	BRCT20050801CEL
WLS-TV, Chicago, IL)	BRCT20050801CUZ
WGN-TV, Chicago, IL)	BRCT20050801BXY
WCIU-TV, Chicago, IL)	BRCT20050801ADO
WFLD-TV, Chicago, IL)	BRCT20050729DSN
WCPX-TV, Chicago, IL)	BRTTA20050729AGG
WSNS-TV, Chicago, IL)	BRCT20050801CFO
WPWR-TV, Gary, IN)	BRCT20050401AQB
WTMJ-TV, Milwaukee, WI)	BRCT20050729CYF
WITI-TV, Milwaukee, WI)	BRCT20050729DRL
WISN-TV, Milwaukee, WI)	BRCT20050801CEF
WVTV, Milwaukee, WI)	BRCT20050801BDQ
WCGV-TV, Milwaukee, WI)	BRCT20050801BBZ
WVCY-TV, Milwaukee, WI)	BRCT20050801AGS
WMLW-CA, Milwaukee, WI)	BRTTA20050801ADM
WJJA-TV, Racine, WI)	BRCT20050725ABE
WWRS-TV, Mayville, WI)	BRCT20050729DNH
WPXE-TV, Kenosha, WI)	BRCT20050729AIH
WDJT-TV, Milwaukee, WI)	BRCT20050801ADL

TO: Chief, Video Division, Media Bureau

PETITION FOR RECONSIDERATION

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July 13, 2007

PETITION FOR RECONSIDERATION

Pursuant to Section 1.106 of the Commission's Rules, Chicago Media Action ("CMA") and Milwaukee Public Interest Media Coalition ("MPIMC") respectfully submits this Petition for Reconsideration of the Media Bureau's letter released June 13, 2007, by which the Chief, Video Division, Media Bureau ("staff"), dismissed CMA's and MPIMC's (collectively "Petitioners") November 1, 2005 *Petitions to Deny.* 22 FCCRcd 10877 (2007) ("*Dismissal Letter*"). The *Petitions to Deny* challenged the license renewals of all commercial television broadcasters (the "Broadcasters") in the Chicago and Milwaukee markets.

As set forth below, this Petition for Reconsideration relies upon facts not previously presented to the staff because they relate to events which have occurred and circumstances which have changed since the last opportunity to present such matters. *See* 47 CFR \$1.106(b)(2)(i) and 47 CFR \$1.106(c)(1).¹ Moreover, and in any event, consideration of these facts is required in the public interest. *See* 47 CFR \$1.106(c)(2).²

As explained further below, the Commission erroneously concluded that it did not have authority to review the Broadcasters' programming decisions. Moreover, the new facts cited below provide powerful additional reasons and further evidence that the Broadcasters in question have not exercised their editorial discretion reasonably or in good faith. In particular, the findings provide evidence of continued nominal coverage of programming to meet the need of the viewers.

Petitioners ask that the staff reconsider and vacate its decision taking into account the additional new information set forth herein and applying the correct legal standard, thereby remedying

¹The NewsLab Study discussed below was not available until June 12, 2007, one day prior to the release of the *Dismissal Letter* and long after the last opportunity for Petitioners to present the findings to the Commission.

² "[S]peech concerning public affairs is more than self expression; it is the essence of self-government." *Garrison v. Louisiana*, 379 US 64, 74-75 (1964).

the errors of law described below. In light of this reconsideration, Petitioners ask that the staff designate these applications for hearing and grant all such other relief as may be just and proper.

I. PETITIONERS SEEK RECONSIDERATION BASED ON NEW FACTS

Petitioners seek reconsideration based upon new facts and changed circumstances. 47 CFR §1.106(c)(1). On June 12, 2007, the University of Wisconsin-Madison NewsLab released a study ("NewsLab Study") which provides further evidence of the Broadcasters' failure to provide programming that meets the needs of the communities of license. See Attachment A. The NewsLab Study tracked and analyzed election news coverage from September 7, 2006 to November 6, 2006 and non-election government news coverage from January 1, 2007 to March 31, 2007. The NewsLab Study covered nine markets in five states including Chicago and Milwaukee. The NewsLab Study focused on early and late-evening local newscasts on ABC, CBS, Fox and NBC affiliates. Among the findings of the NewsLab Study are the following:

From September 7, 2006 to October 6, 2006, during a typical 30 minute newscast:

- The Chicago market aired, on average, 29 seconds of election coverage.
- The Milwaukee market aired, on average, 36 seconds of election coverage.

From October 7, 2006 to November 6, 2006, during a typical 30 minute newscast:

- The Chicago market aired, on average, 2 minutes and 2 seconds of election coverage compared to 3 minutes and 57 seconds of political advertising.
- The Milwaukee market aired, on average, 1 minute and 41 seconds of election coverage compared to 2 minutes and 52 seconds of political advertising.

From September 6, 2006 to November 6, 2006:

- Of 611 election stories analyzed in the Chicago market, on averge, 73% were strategy frame and horse race frame coverage.
- Of 539 election stories analyzed in the Milwaukee market, on average, 57% were strategy frame and horse race frame coverage.

From January 1, 2007 to March 31, 2007, during a typical 30 minute newscast:

- The Chicago market aired, on average, 56 seconds of election coverage.
- The Milwaukee market aired, on average, 10 seconds of election coverage.

II. THE MEDIA BUREAU DECISION

The *Petitions to Deny* sought to challenge the license renewals of all the commercial television broadcast stations in the Chicago and Milwaukee markets. The *Petitions to Deny* made a specific showing that the Broadcasters, singly and together, failed to provide adequate programming relating to state and local elections. Because of this marketwide failure, the Petitioners asked the Commission to designate the applications for hearing on the basis that the Broadcasters have failed to serve the public interest.

Despite the evidence demonstrating that there are substantial and material issues of fact as to whether renewal of the licenses is in the pubic interest, the Chief, Video Division, Media Bureau denied the *Petitions to Deny*. Asserting that "Section 326 of the Act and the First Amendment to the Constitution prohibit any Commission actions that would improperly interfere with the programming decisions of licensees...," the staff claimed that "the Commission has very little authority to interfere with a licensee's selection and presentation of news and editorial programming" and that "[q]uantity is not necessarily an accurate measure of the overall responsiveness of a licencee's programming." *Dismissal Letter* at 2-3.

III. THE NEWSLAB STUDY CORROBORATES PETITIONERS' INITIAL FINDINGS OF BROADCASTERS' FAILURE TO SERVE THE PUBLIC INTEREST

The NewsLab Study underscores and corroborates the Petitioners' initial findings regarding the lack of local news programming available to the communities of license. The study, which provides quantitative evidence of the nominal local election news coverage, tracked and analyzed news coverage from September 7, 2006 to November 6, 2006, commonly known as the election season. The NewsLab Study also tracked and analyzed news coverage from January 1, 2007 to March 31, 2007. The study covered nine markets in five states including the Chicago and Milwaukee markets. NewsLab Study at 2. The study focused on early and late-evening local newscasts on ABC, CBS, Fox and NBC affiliates. *Id.*

The results of the NewsLab Study demonstrate that Broadcasters are failing to provide viewers with local news election coverage. From September 7, 2006 to October 6, 2006, a 30 minute newscast in the Chicago market aired, on average, only 29 seconds of election coverage. *Id.* at 5. During that same period, the Milwaukee market aired 36 seconds of election coverage. *Id.* at 9.

Similarly, Broadcasters provided nominal local election coverage in the final month before November elections. From October 7, 2006 to November 6, 2006, a 30 minute newscast in the Chicago market aired, on average, 2 minutes and 2 seconds of election coverage compared to 3 minutes and 57 seconds of political advertisements. *Id.* at 5. During that same period, the Milwaukee market aired, on average, 1 minute and 41 seconds of election coverage compared to 2 minutes and 52 seconds of political advertisements. *Id.* at 9.

Additionally, between September 7, 2006 to November 6, 2006, 611 election stories were analyzed in the Chicago market. *Id.* at 15. Strategy frame and horse race frame coverage averaged 73%. *Id.* During that same time period, 539 election stories were analyzed in the Milwaukee market. *Id.* Strategy frame and horse race frame coverage averaged 57%. *Id.*

Most recently, from January 1, 2007 to March 31, 2007, during a typical 30 minute newscast the Chicago market aired 56 seconds of election coverage. *Id.* at 18. During that same period the Milwaukee market aired, on average, 10 seconds of election coverage. *Id.* at 22.

The Commission can have no doubt as to the Petitioners' initial findings or to the abysmal amount of time Broadcasters are devoting to local news coverage. Collectively, the NewsLab Study

and the study conducted by the Center for Media and Public Affairs, which Petitioners presented in the *Petitions to Deny*, provide overwhelming evidence of the Broadcasters' failure to exercise their editorial discretion in good faith. At a minimum, these studies demonstrate *prima facie* evidence of substantial and material questions of fact regarding the Broadcasters' obligation to fulfill the public interest.

IV. THE BROADCASTERS' EDITORIAL DISCRETION IS NOT ABSOLUTE

The staff's *Dismissal Letter* erroneously concludes that Section 326 of the Communications Act and the First Amendment somehow preclude the Commission from reviewing the Broadcasters' editorial discretion in presenting news. *Dismissal Letter* at 2-3. Declaring that "[q]uantity is not necessarily an accurate measure of the overall responsiveness of a licensee's programming...," *id.* at 3, the staff failed to consider, much less evaluate, Petitioners' numerical data as support of the Broadcasters' failure to serve the needs of the public.

The staff decision is wrong as a matter of law. It fails to acknowledge the "paramount" statutory and constitutional rights of viewers to receive programming responsive to the needs of the community or recognize prior precedent under which the Commission has considered quantity of programming as an important measure of the responsiveness of a licensee's programming.

A. The First Amendment Serves Both the Broadcasters and Viewers

As a matter of policy, there is surely good reason to afford wide programming discretion to broadcasters. However, the *Dismissal Letter* affords almost absolute discretion to the Broadcasters, claiming that this finding is somehow compelled by the First Amendment.

This cannot be reconciled with the case law. The Supreme Court has consistently rejected broadcasters' assertions that the First Amendment affords unlimited discretion to broadcasters. *See CBS, Inc. v. FCC*, 453 U.S. 367 (1981); *FCC v. Pacifica Foundation*, 438 U.S. 726 (1978). Rather,

the Supreme Court's jurisprudence give precedence to the *public's* right to receive information that is critical to a functioning democracy. Indeed,

[b]ecause of the scarcity of radio frequencies, the Government is permitted to put restraints on licensees in favor of others whose views should be expressed on this unique medium. But the people as a whole retain their interest in free speech by radio and their collective right to have the medium function consistently with the ends and purposes of the First Amendment. *It is the right of the viewers and listeners, not the right of the broadcasters, which is paramount.*

Red Lion Broadcasting Co. v. FCC, 395 U.S. 367, 390 (1969) (emphasis added) (citations omitted).

Sections 312(a)(7) and 315 of the Communications Act delineate specific obligations as to political broadcasting, and link this performance to "the obligation under this Act to operate in the public interest," 47 USC §315(a); *see Licensee Responsibility as to Political Broadcasts*, 15 FCC2d 94 (1968). Section 307 emphasizes the role of localism, and the Commission and the Courts have long held that localism is a basic element of the Commission's public interest analysis of broadcast application. *See NBC v. U.S.*, 319 U.S. 190, 203 (1943). Thus, viewers have the right to expect programming that will provide them the information to meaningfully participate in a democracy, which includes local government elections.

The notion that evaluating the programming of broadcasters "would improperly interfere with the programming decisions of licensees," *Dismissal Letter* at 2, is false. The airwaves belong to the public. The *quid pro quo* for broadcasters' right to exclusive use of publicly owned spectrum is their commitment under the Communications Act to serve the public interest. As then-Judge Burger put

it,

A broadcaster seeks and is granted the free and exclusive use of a limited and valuable part of the public domain; when he accepts that franchise it is burdened by enforceable public obligations. A newspaper can be operated at the whim or caprice of its owners; a broadcast station cannot. After nearly five decades of operation the broadcast industry does not seem to have grasped the simple fact that a broadcast license is a public trust subject to termination for breach of duty. *UCC v. FCC*, 359 F.2d 994, 1003 (D.C. Cir. 1966). *See also, Rust v. Sullivan*, 500 U.S. 173 (1991) (holding that those volunteering for grants of governmental largesse must accept conditions on their speech rights).

Despite the clear expectations of viewers, the Commission's *Dismissal Letter* fails completely to recognize the "paramount" First Amendment rights of the viewers that the Broadcasters are required to serve. *Red Lion*, 395 U.S. at 390. Instead, the Media Bureau relies solely on the Broadcasters' free press rights to suggest that it cannot review the Broadcasters' news judgments. *Dismissal Letter* at 2-3. However, as a matter of public interest, the Media Bureau must consider whether the expectations of the viewers have been met, and as the new evidence suggests, it is highly suspect that those expectations have been met. Petitioners request that the Media Bureau review the new evidence, take into account the rights of the viewers, and reconsider its *Dismissal Letter*.

B. Quantity of Programming Is Relevant to the Commission's Decision

The Commission entirely failed to consider the detailed facts that Petitioners submitted as *prima facie* evidence of the Broadcasters' failure to serve their communities. Instead, the Media Bureau seems to put a heavy burden on Petitioners to prove that a licensee's programming was unresponsive to its community. This is contrary to Commission and judicial precedent.

The Commission has "acknowledged that some consideration to quantity must be given in the context of evaluating a petition to deny." *See UCC v. FCC*, 707 F.2d at 1433. In fact, prior to the Commission's decision to make modifications to the regulations governing broadcasters, quantity of programming was the primary criterion in determining whether a broadcaster had served the public interest. *See Harriscope of Chicago*, 5 FCCRcd 6383 (1990);³ *see also, In the Matter of Revision*

³In *Harriscope of Chicago*, the Commission denied renewal expectancy to a licensee which carried, *inter alia*, 0.89% local programming during the course of its license term. The ALJ found that in the latter part of the term, the station "broadcast no news, no regular local programs and

of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations, 98 FCC2d 1075 (1984). Although the Commission abandoned the use of formal processing guidelines based on the quantity of nonentertainment programming in the renewal process, the change did not deem quantity completely irrelevant. See In the Matter of Revision of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations, 104 FCC2d 357, n.8 (1986) ("Our decision, however, cannot reasonably be read to have rendered quantity irrelevant."); see also UCC v. FCC, 707 F.2d at 1433 ("[W]e view the Commission policy in this area as basically unchanged"). Therefore, "[q]uantity of programming remains...a factor that the Commission may choose to de-emphasize, but may not ignore altogether." UCC v. FCC, 707 F.2d at 1434.

In light of the past Commission enforcement of guidelines under the Communications Act, it is particularly odd for the staff to suggest that the statute precludes the Commission from considering quantitative programming issues. Indeed, the Children's Television Act actually mandates the Commission to enforce quantitative minima of certain programming. *See* 47 USC §303(a).

Thus, the staff is wrong as a matter of law in disregarding Petitioners' evidence and asserting that the amount of non-entertainment programming to be carried is entirely within the Broadcasters' unreviewable discretion. As the D.C. Circuit has held, "despite the fact that quantity of programming is largely left to the licensee's discretion, the program service may be so minimal in contrast to the needs of the community that it 'create[s] a disparity so significant as to amount to a difference in kind rather than in degree." *UCC v. FCC*, 707 F.2d at 1433-34, n.70 (*quoting Alianza Federal de Mercedes v. FCC*, 539 F.2d 732, 738 (1976)). Here, the studies provide significant evidence that

effectively shut down its studios." Id. at 8385 (quoting Video 44, 102 FCC2d 419, 458-59 (1985)).

despite news coverage, local election news coverage is minimal and not meaningful. Simply because the Broadcasters have provided some coverage, does not shield them from scrutiny. In fact, the Commission has recognized that "an allegation that this [issue responsive] obligation has not been met, as well as an allegation that a licensee has failed to address an issue of particular relevance to a significant segment of the community, may be raised even where some issue-responsive programming has been provided." *In the Matter of Revision of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations*, 104 FCC2d 357, 358 (1986); *see also, Television Deregulation*, 98 FCC2d 1075, 1094 (1984) ("Such a petition may be brought even in cases where a licensee has provided some issue-responsive programming.").

In the above-captioned license renewals, Petitioners alleged that, despite the airing of news, broadcasters had failed to provide sufficient local election news coverage. In making that allegation, Petitioners provided quantitative evidence of the lack of news coverage. Insufficient quantities of nonentertainment programming are not only a factor, but, in this instance, also serve as *prima facie* evidence of the Broadcasters' failure to serve the community of license. Petitioners request that the Media Bureau review the new evidence, take into account the abysmal amount of local news cover age, and reconsider its *Dismissal Letter*.

V. CONCLUSION

Based on the new data presented in the NewsLab Study, which corroborates the evidence presented in the *Petitions to Deny*, Petitioners ask the Media Bureau to reconsider its decision. In reconsidering its decision, the Media Bureau must acknowledge and consider the rights of the viewers to receive local election news. More importantly, there exists *prima facie* evidence raising substantial and material questions of fact as to whether the Broadcasters have fulfilled their duty to serve the

public interest during the license period. Thus, the Commission must designate the Broadcasters' renewal applications for a hearing to resolve these substantial and material questions of fact and grant all such other relief as may be just and proper.

Respectfully submitted,

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July 13, 2007



Tracking News Across the Country

MIDWEST NEWS INDEX

An Analysis of Local Television News Coverage of Elections and Government In Illinois, Michigan, Minnesota, Ohio and Wisconsin

Developed By The University of Wisconsin-Madison NewsLab

For additional information contact:

Dr. Kenneth M. Goldstein Wisconsin Advertising Project Department of Political Science University of Wisconsin-Madison <u>kmgoldstein@facstaff.wisc.edu</u> Since September 2006, The University of Wisconsin-Madison's NewsLab has systematically monitored and evaluated local television news coverage of elections and government. Directed by political science professor Ken Goldstein, the UW NewsLab is a state-of-the art facility that has the infrastructure and capacity to capture, clip, code, analyze and archive any media in any market—domestic or international—in real time. Under the auspices of the Midwest News Index (MNI), an initiative directed by Dr. Goldstein and funded by the Joyce Foundation of Chicago, the UW NewsLab has assembled a large and representative sample of early and late-evening local newscasts on ABC, CBS, Fox and NBC affiliates in nine market across Illinois (Chicago and Springfield), Michigan (Detroit and Lansing), Minnesota (Minneapolis-St. Paul), Ohio (Cleveland and Columbus), and Wisconsin (Milwaukee and Madison). Due to the study's scale and duration, as well as its focus on a key region of the country, the Midwest News Index and its large archive are truly unique.

To date, the Midwest News Index has generated three reports. The first two—released in October and November 2006—tracked and analyzed the volume and content of local TV election news coverage from Labor Day to Election Day. The most recent report, completed in May, takes a close look at news coverage of government—federal, state and local, and is the first such systematic analysis of local TV political news outside of an election period. The results of these analyses—broken down by region, media markets, and stations—are summarized below. These tables and the Midwest News Index archive can also be accessed on the UW NewsLab's website at <u>www.mni.wisc.edu</u>.

Election News Coverage

September 7-October 6, 2006

Key Finding: Between the traditional Labor Day kickoff of the 2006 election season and October 6, television stations in nine Midwest markets devoted an average of 36 seconds to election coverage during the typical 30-minute local news broadcast. By contrast, the typical early-and late-evening local news broadcast contained more than 10 minutes of advertising, over seven minutes of sports and weather, and almost two and a half minutes of crime stories. (Of the more than 1,800 broadcasts analyzed (900 hours of programming), 1,629 election related stories aired. These included stories that were primarily about campaigns and elections and stories that either tangentially included elections or that mentioned a candidate running for office in November 2006.)

Advertising	10 min 7 sec
Sports and weather	7 min 1 sec
Crime	2 min 27 sec
Other	2 min 18 sec
Local interest	2 min 1 sec
Teasers, bumpers, intros	1 min 46 sec
Government news	1 min 6 sec
Health	1 min 4 sec
Business, economy	1 min 2 sec
Election coverage	36 sec
Foreign policy	23 sec
Unintentional injury	11 sec

Typical 30 Minute Broadcast Breakdown

Other findings:

- Just over half of all broadcasts (56 percent) contained at least one story that was primarily about elections, and the average length of stories devoted primarily to elections was 68 seconds.
- In coverage of elections, strategy and horserace vastly outweighed substantive issue coverage by a margin of almost 3 to 1 (63 percent to 23 percent).

October 7-November 6, 2006

Key Finding: During the final month leading up to last November's elections (October 7-November 6), local television news viewers in nine Midwest markets received considerably more information about campaigns from paid political advertisements than from actual news coverage. The UW NewsLab's analysis of local newscasts in seven markets revealed that nearly four and a-half minutes of paid political ads aired during the typical 30-minute broadcast compared with an average of one minute and 43 seconds of election news coverage. (During this period, 2,392 election stories and 8,995 political ads aired in the broadcasts on the stations in the seven markets targeted by the UW NewsLab.)

Typical 30 Minute Broadcast Breakdown

Total Advertising * Political advertising * Avg. number of political ads	9 min 46 sec 4 min 24 sec 8.81
Sports and weather	6 min 58 sec
Crime	2 min 20 sec
Other	2 min 13 sec
Local interest	1 min 54 sec
Teasers, bumpers, intros	1 min 51 sec
Election coverage	1 min 43 sec
Government news	1 min 2 sec
Business, economy	47 sec
Health	45 sec
Foreign policy	27 sec
Unintentional injury	14 sec

Other findings:

- Most of the actual news coverage of elections on early and late-evening broadcasts was devoted to campaign strategy and polling, which outpaced reporting on policy issues by a margin of over three to one (65 percent to 17 percent).
- The average length of a single story focused primarily on elections was roughly 76 seconds. (By contrast, a similar national study conducted by the UW NewsLab during the 2002 mid-term election found the average story ran 89 seconds.)
- There was a political ad "echo effect": over one in ten election news stories mentioned, pictured, or focused on a specific campaign ad.
- 41 percent of the election stories were aired in the final week before Election Day.

<u>Illinois</u>

Category	Five State Avg.	Chicago	Springfield
Advertising	10 min 7 sec	9 min 26	10 min 26 sec
Sports and weather	7 min 1 sec	6 min 5 sec	7 min 17 sec
Crime	2 min 27 sec	1 min 56 sec	1 min 40 sec
Other	2 min 18 sec	2 min 36 sec	1 min 54 sec
Local interest	2 min 1 sec	2 min 30 sec	2 min 23 sec
Teasers, bumpers, intros	1 min 46 sec	2 min 3 sec	1 min 51 sec
Non-election gov't news	1 min 6 sec	1 min 27 sec	1 min 26 sec
Health	1 min 4 sec	1 min 24 sec	1 min 15 sec
Business, economy	1 min 2 sec	1 min 16 sec	1 min 4 sec
Election coverage	36 sec	29 sec	21 sec
Foreign policy	23 sec	31 sec	18 sec
Unintentional injury	11 sec	17 sec	4 sec

Broadcast Breakdown—September 7-October 6

Broadcast Breakdown—October 7-November 6

Category	Five State Avg.*	Chicago	Springfield
Total Advertising	9 min 46 sec	9 min 16 sec	10 min 15 sec
*Political Advertising	4 min 24 sec	3 min 57 sec	NA
*Avg. Number of Political Ads	8.81	7.89	NA
Sports and weather	6 min 58 sec	6 min 6 sec	7 min 19 sec
Crime	2 min 20 sec	2 min 7 sec	1 min 39 sec
Other	2 min 13 sec	2 min 29 sec	1 min 39 sec
Local interest	1 min 54 sec	2 min 10 sec	2 min 29 sec
Teasers, bumpers, intros	1 min 51 sec	2 min 7 sec	1 min 58 sec
Election coverage	1 min 43 sec	2 min 2 sec	1 min
Non-election gov't news	1 min 2 sec	1 min 7 sec	1 min 26 sec
Business, economy	47 sec	43 sec	50 sec
Health	45 sec	54 sec	58 sec
Foreign policy	27 sec	34 sec	23 sec
Unintentional injury	14 sec	26 sec	5 sec

*Note: The five-state average does not include data from Springfield because advertising data was not available for the market.

<u>Michigan</u>

Category	Five State Avg.	Detroit	Lansing
Advertising	10 min 7 sec	10 min 21 sec	10 min 49 sec
Sports and weather	7 min 1 sec	7 min 39 sec	7 min 7 sec
Crime	2 min 27 sec	2 min 10 sec	2 min 5 sec
Other	2 min 18 sec	1 min 40 sec	1 min 41 sec
Local interest	2 min 1 sec	2 min 5 sec	2 min 12 sec
Teasers, bumpers, intros			
_	1 min 46 sec	1 min 36 sec	1 min 46 sec
Non-election gov't news			
	1 min 6 sec	55 sec	58 sec
Health	1 min 4 sec	47 sec	55 sec
Business, economy	1 min 2 sec	1 min 48 sec	1 min 26 sec
Election coverage	36 sec	22 sec	27 sec
Foreign policy	23 sec	31 sec	23 sec
Unintentional injury			
	11 sec	9 sec	8 sec

Broadcast Breakdown—September 7-October 6

Broadcast Breakdown—October 7-November 6

Category	Five State Avg.*	Detroit	Lansing
Total Advertising	9 min 46 sec	10 min 8 sec	10 min 55 sec
*Political Advertising	4 min 24 sec	4 min 18 sec	NA
*Avg. Number of Political Ads	8.81	8.59	NA
Sports and weather	6 min 58 sec	9 min 20 sec	7 min 30 sec
Crime	2 min 20 sec	1 min 46 sec	2 min 3 sec
Other	2 min 13 sec	1 min 26 sec	1 min 3 sec
Local interest	1 min 54 sec	1 min 28 sec	1 min 25 sec
Teasers, bumpers, intros	1 min 51 sec	1 min 42 sec	1 min 53 sec
Election coverage	1 min 43 sec	1 min 23 sec	1 min 46sec
Non-election gov't news	1 min 2 sec	30 sec	59 sec
Business, economy	47 sec	1 min 11 sec	1 min 17 sec
Health	45 sec	37 sec	39 sec
Foreign policy	27 sec	19 sec	25 sec
Unintentional injury	14 sec	10 sec	4 sec

*Note: The five-state average does not include data from Lansing because advertising data was not available for the market.

<u>Minnesota</u>

Category	Five State Avg.	Minneapolis/ St. Paul
Advertising	10 min 7 sec	10 min 5 sec
Sports and weather	7 min 1 sec	7 min 26 sec
Crime	2 min 27 sec	2 min 29 sec
Other	2 min 18 sec	2 min 51 sec
Local interest	2 min 1sec	1 min 31 sec
Teasers, bumpers, intros	1 min 46 sec	1 min 50 sec
Non-election gov't news	1 min 6 sec	46 sec
Health	1 min 4 sec	51 sec
Business, economy	1 min 2 sec	47 sec
Election coverage	36 sec	50 sec
Foreign policy	23 sec	23 sec
Unintentional injury	11 sec	11 sec

Broadcast Breakdown—September 7-October 6

Broadcast Breakdown—October 7-November 6

Category	Five State Avg.	Minneapolis/ St. Paul
Total Advertising	9 min 46 sec	9 min 59 sec
*Political Advertising	4 min 24 sec	4 min 14 sec
*Avg. Number of Political Ads	8.81	8.45
Sports and weather	6 min 58 sec	5 min 57 sec
Crime	2 min 20 sec	1 min 52 sec
Other	2 min 13 sec	2 min 43 sec
Local interest	1 min 54 sec	1 min 49 sec
Teasers, bumpers, intros	1 min 51 sec	
		1 min 55 sec
Election coverage	1 min 43 sec	1 min 48 sec
Non-election gov't news	1 min 2 sec	57 sec
Business, economy	47 sec	1 min 2 sec
Health	45 sec	1 min 1 sec
Foreign policy	27 sec	39 sec
Unintentional injury	14 sec	18 sec

<u>Ohio</u>

Category	Five State Avg.	Cleveland	Columbus
Advertising	10 min 7 sec	10 min 1 sec	10 min 25 sec
Sports and weather	7 min 1 sec	5 min 55 sec	8 min 1 sec
Crime	2 min 27 sec	3 min 25 sec	2 min 51 sec
Other	2 min 18 sec	2 min 43 sec	1 min 59 sec
Local interest	2 min 1 sec	2 min 6 sec	1 min 31 sec
Teasers, bumpers, intros	1 min 46 sec	1 min 39 sec	1 min 42 sec
Non-election gov't news	1 min 6 sec	1 min 17 sec	1 min 05 sec
Health	1 min 4 sec	52 sec	46 sec
Business, economy	1 min 2 sec	55 sec	34 sec
Election coverage	36 sec	34 sec	36 sec
Foreign policy	23 sec	13 sec	18 sec
Unintentional injury	11 sec	21 sec	13 sec

Broadcast Breakdown—September 7-October 6

Broadcast Breakdown—October 7-November 6

Category	Five State Avg.	Cleveland	Columbus
Total Advertising	9 min 46 sec	9 min 16 sec	10 min 25 sec
*Political Advertising	4 min 24 sec	5 min 6 sec	7 min 21 sec
*Avg. Number of Political Ads	8.81	10.2	14.71
Sports and weather	6 min 58 sec	6 min 44 sec	7 min 29 sec
Crime	2 min 20 sec	3 min 13 sec	3 min
Other	2 min 13 sec	2 min 26 sec	1 min 52 sec
Local interest	1 min 54 sec	2 min 26 sec	1 min 35 sec
Teasers, bumpers, intros	1 min 51 sec		
		1 min 50 sec	1 min 45 sec
Election coverage	1 min 43 sec	1 min 17 sec	1 min 29 sec
Non-election gov't news	1 min 2 sec	1 min 16 sec	1 min 9 sec
Business, economy	47 sec	45 sec	26 sec
Health	45 sec	35 sec	25 sec
Foreign policy	27 sec	19 sec	15 sec
Unintentional injury	14 sec	18 sec	9 sec

<u>Wisconsin</u>

Category	Five State Avg.	Milwaukee	Madison
Advertising	10 min 7 sec	9 min 16 sec	10 min 22 sec
Sports and weather	7 min 1 sec	6 min 41 sec	7 min 11 sec
Crime	2 min 27 sec	3 min 11 sec	2 min 7 sec
Other	2 min 18 sec	2 min 29 sec	2 min 27 sec
Local interest	2 min 1 sec	1 min 58 sec	1 min 51 sec
Teasers, bumpers, intros	1 min 46 sec	2 min	1 min 21 sec
Non-election gov't news	1 min 6 sec	54 sec	56 sec
Health	1 min 4 sec	1 min 22 sec	1 min 19 sec
Business, economy	1 min 2 sec	48 sec	52 sec
Election coverage	36 sec	36 sec	1 min 5 sec
Foreign policy	23 sec	31 sec	21 sec
Unintentional injury	11 sec	13 sec	4 sec

Broadcast Breakdown—September 7-October 6

Broadcast Breakdown—October 7-November 6

Category	Five State Avg.	Milwaukee	Madison
Total Advertising	9 min 46 sec	9 min 1 sec	10 min 21 sec
*Political Advertising	4 min 24 sec	2 min 52 sec	2 min 41 sec
*Avg. Number of Political Ads	8.81	5.73	5.37
Sports and weather	6 min 58 sec	6 min 48 sec	7 min 6 sec
Crime	2 min 20 sec	3 min 6 sec	1 min 8 sec
Other	2 min 13 sec	2 min 19 sec	2 min 6 sec
Local interest	1 min 54 sec	1 min 45 sec	2 min 42 sec
Teasers, bumpers, intros	1 min 51 sec		
		1 min 54 sec	1 min 39 sec
Election coverage	1 min 43 sec	1 min 41 sec	2 min 14 sec
Non-election gov't news	1 min 2 sec	1 min 12 sec	51 sec
Business, economy	47 sec	45 sec	41 sec
Health	45 sec	38 sec	1 min 1 sec
Foreign policy	27 sec	40 sec	22 sec
Unintentional injury	14 sec	11 sec	8 sec

<u>Illinois</u>

Category	Five State Avg.	Chicago Avg.	Springfield Avg.
Advertising	10 min 1 sec	9 min 21 sec	10 min 20 sec
Sports and Weather	7 min 2 sec	6 min 5 sec	7 min 18 sec
Crime	2 min 21 sec	2 min 1 sec	1 min 40 sec
Other	2 min 11 sec	2 min 32 sec	1 min 47 sec
Local Interest	1 min 58 sec	2 min 21 sec	2 min 25 sec
Teasers, Bumpers, Intro	1 min 49 sec	2 min 5 sec	1 min 54 sec
Election Coverage	1 min 6 sec	1 min 12 sec	38 sec
Non-Election Gov't News	1 min 5 sec	1 min 18 sec	1 min 26 sec
Business, Economy	56 sec	1 min 1 sec	57 sec
Health	55 sec	1 min 10 sec	1 min 7 sec
World Affairs	25 sec	33 sec	22 sec
Unintentional Injury	12 sec	21 sec	5 sec

State Broadcast Breakdown by Market

Chicago Broadcast Breakdown by Station

Category	Chicago Avg.	WMAQ (NBC)	WLS (ABC)	WBBM (CBS)	WFLD (FOX)
Advertising	9 min 21 sec	9 min 31 sec	8 min 58 sec	9 min 33 sec	9 min 24 sec
Sports and Weather	6 min 5 sec	5 min 57 sec	6 min 44 sec	6 min 27 sec	4 min 58 sec
Crime	2 min 1 sec	2 min 12 sec	1 min 51 sec	1 min 37 sec	2 min 31 sec
Other	2 min 32 sec	2 min 43 sec	2 min 48 sec	2 min 23 sec	2 min 8 sec
Local Interest	2 min 21 sec	2 min 17 sec	2 min 30 sec	2 min 22 sec	2 min 12 sec
Teasers, Bumpers, Intro	2 min 5 sec	1 min 53 sec	1 min 58 sec	2 min 26 sec	2 min 4 sec
Election Coverage	1 min 12 sec	1 min 16 sec	1 min 12 sec	53 sec	1 min 31 sec
Non-Election Gov't News	1 min 18 sec	1 min 9 sec	1 min 20 sec	1 min 11 sec	1 min 36 sec
Business, Economy	1 min 1 sec	59 sec	1 min 6 sec	46 sec	1 min 14 sec
Health	1 min 10 sec	1 min 6 sec	48 sec	1 min 31 sec	1 min 18 sec
World Affairs	33 sec	32 sec	27 sec	28 sec	47 sec
Unintentional Injury	21 sec	26 sec	17 sec	23 sec	17 sec

Springfield Broadcast Breakdown by Station

Category	Springfield Avg.	WAND (NBC)	WICS (ABC)	WCIA (CBS)	WRSP (FOX)
Advertising	10 min 20 sec	9 min 43 sec	9 min 52 sec	11 min 13 sec	10 min 57 sec
Sports and Weather	7 min 18 sec	8 min 28 sec	7 min 4 sec	7 min 9 sec	5 min 22 sec
Crime	1 min 40 sec	1 min 49 sec	1 min 46 sec	1 min 19 sec	1 min 51 sec
Other	1 min 47 sec	1 min 46 sec	1 min 43 sec	1 min 59 sec	1 min 30 sec
Local Interest	2 min 25 sec	2 min 26 sec	2 min 20 sec	2 min 33 sec	2 min 16 sec
Teasers, Bumpers, Intro	1 min 54 sec	1 min 29 sec	1 min 53 sec	2 min 11 sec	2 min 22 sec
Election Coverage	38 sec	33 sec	52 sec	24 sec	55 sec
Non-Election Gov't News	1 min 26 sec	1 min 17 sec	1 min 46 sec	1 min 10 sec	1 min 35 sec
Business, Economy	57 sec	1 min 1 sec	1 min 2 sec	46 sec	1 min 6 sec
Health	1 min 7 sec	1 min 10 sec	1 min 17 sec	45 sec	1 min 27 sec
World Affairs	22 sec	12 sec	20 sec	28 sec	38 sec
Unintentional Injury	5 sec	7 sec	4 sec	5 sec	1 sec

<u>Michigan</u>

Category	Five State Avg.	Lansing Avg.	Detroit Avg.
Advertising	10 min 1 sec	10 min 52 sec	10 min 15 sec
Sports and Weather	7 min 2 sec	7 min 17 sec	8 min 27 sec
Crime	2 min 21 sec	2 min 4 sec	1 min 59 sec
Other	2 min 11 sec	1 min 24 sec	1 min 33 sec
Local Interest	1 min 58 sec	1 min 52 sec	1 min 47 sec
Teasers, Bumpers, Intro	1 min 49 sec	1 min 49 sec	1 min 38 sec
Election Coverage	1 min 6 sec	1 min 3 sec	51 sec
Non-Election Gov't News	1 min 5 sec	58 sec	43 sec
Business, Economy	56 sec	1 min 22 sec	1 min 30 sec
Health	55 sec	48 sec	42 sec
World Affairs	25 sec	24 sec	25 sec
Unintentional Injury	12 sec	6 sec	9 sec

State Broadcast Breakdown by Market

Lansing Broadcast Breakdown by Station

Category	Lansing Avg.	WLAJ (ABC)	WLNS (CBS)	WSYM (FOX)	WILX (NBC)
Advertising	10 min 52 sec	8 min 20 sec	11 min 1 sec	10 min 39 sec	11 min 39 sec
Sports and Weather	7 min 17 sec	3 min 10 sec	8 min 1 sec	6 min 38 sec	8 min 19 sec
Crime	2 min 4 sec	4 min 24 sec	2 min 17 sec	1 min 28 sec	1 min 38 sec
Other	1 min 24 sec	1 min 49 sec	1 min 25 sec	1 min 30 sec	1 min 11 sec
Local Interest	1 min 52 sec	2 min 47 sec	1 min 10 sec	2 min 33 sec	1 min 44 sec
Teasers, Bumpers, Intro	1 min 49 sec	2 min 14 sec	1 min 46 sec	2 min 10 sec	1 min 30 sec
Election Coverage	1 min 3 sec	1 min 15 sec	53 sec	53 sec	1 min 17 sec
Non-Election Gov't News	58 sec	1 min 57 sec	1 min 8 sec	35 sec	49 sec
Business, Economy	1 min 22 sec	3 min 18 sec	55 sec	1 min 53 sec	49 sec
Health	48 sec	18 sec	49 sec	1 min 3 sec	45 sec
World Affairs	24 sec	16 sec	28 sec	35 sec	13 sec
Unintentional Injury	6 sec	11 sec	7 sec	4 sec	6 sec

Detroit Broadcast Breakdown by Station

Category	Detroit Avg.	WDIV (NBC)	WXYZ (ABC)	WJBK (FOX)
Advertising	10 min 15 sec	10 min 28 sec	10 min 9 sec	10 min 5 sec
Sports and Weather	8 min 27 sec	9 min 12 sec	8 min 57 sec	6 min 34 sec
Crime	1 min 59 sec	1 min 52 sec	1 min 37 ec	2 min 41 sec
Other	1 min 33 sec	1 min 14 sec	1 min 37 sec	1 min 55 sec
Local Interest	1 min 47 sec	1 min 23 sec	1 min 46 sec	2 min 26 sec
Teasers, Bumpers, Intro	1 min 38 sec	1 min 39 sec	1 min 28 sec	1 min 49 sec
Election Coverage	51 sec	55 sec	1 min 2 sec	27 sec
Non-Election Gov't News	43 sec	33 sec	40 sec	1 min 4 sec
Business, Economy	1 min 30 sec	1 min 29 sec	1 min 46 sec	1 min 10 sec
Health	42 sec	38 sec	32 sec	1 min 6 sec
World Affairs	25 sec	21 sec	22 sec	36 sec
Unintentional Injury	9 sec	15 sec	5 sec	7 sec

<u>Minnesota</u>

Category	Five State Avg.	Minneapolis/St. Paul Avg.
Advertising	10 min 1 sec	10 min 2 sec
Sports and Weather	7 min 2 sec	6 min 44 sec
Crime	2 min 21 sec	2 min 12 sec
Other	2 min 11 sec	2 min 47 sec
Local Interest	1 min 58 sec	1 min 40 sec
Teasers, Bumpers, Intro	1 min 49 sec	1 min 52 sec
Election Coverage	1 min 6 sec	1 min 17 sec
Non-Election Gov't News	1 min 5 sec	51 sec
Business, Economy	56 sec	54 sec
Health	55 sec	56 sec
World Affairs	25 sec	31 sec
Unintentional Injury	12 sec	14 sec

State Broadcast Breakdown by Market

Minneapolis/St. Paul Broadcast Breakdown by Station

Category	Minn/St. Paul Avg.	KARE (NBC)	KSTP (ABC)	WCCO (CBS)	KMSP (FOX)
Advertising	9 min 59 sec	10 min 2 sec	10 min 41 sec	10 min 17 sec	8 min 51 sec
Sports and Weather	5 min 57 sec	7 min 44 sec	6 min 22 sec	6 min 3 sec	6 min 46 sec
Crime	1 min 52 sec	1 min 42 sec	2 min 42 sec	1 min 39 sec	2 min 47 sec
Other	2 min 43 sec	2 min 47 sec	2 min 27 sec	3 min 2 sec	2 min 56 sec
Local Interest	1 min 49 sec	1 min 33 sec	1 min 36 sec	1 min 44 sec	1 min 48 sec
Teasers, Bumpers, Intro	1 min 55 sec	1 min 47 sec	1 min 24 sec	1 min 58 sec	2 min 32 sec
Election Coverage	1 min 17 sec	1 min 27 sec	1 min 15 sec	1 min 25 esc	58 sec
Non-Election Gov't News	57 sec	45 sec	1 min 9 sec	39 sec	48 sec
Business, Economy	1 min 2 sec	47 sec	1 min	1 min	48 sec
Health	1 min 1 sec	55 sec	35 sec	1 min 30 sec	46 sec
World Affairs	39 sec	24 sec	32 sec	30 sec	40 ec
Unintentional Injury	18 sec	9 sec	16 sec	14 sec	19 sec

<u>Ohio</u>

State Broadcast Breakdown by Market

Category	Five State Avg.	Columbus Avg.	Cleveland Avg.
Advertising	10 min 1 sec	10 min 25 sec	9 min 40 sec
Sports and Weather	7 min 2 sec	7 min 46 sec	6 min 18 sec
Crime	2 min 21 sec	2 min 55 sec	3 min 20 sec
Other	2 min 11 sec	1 min 56 sec	2 min 35 sec
Local Interest	1 min 58 sec	1 min 33 sec	2 min 3 sec
Teasers, Bumpers, Intro	1 min 49 sec	1 min 44 sec	1 min 44 sec
Election Coverage	1 min 6 sec	1 min 1 sec	54 sec
Non-Election Gov't News	1 min 5 sec	1 min 7 sec	1 min 16 sec
Business, Economy	56 sec	30 sec	50 sec
Health	55 sec	36 sec	44 sec
World Affairs	25 sec	16 sec	16 sec
Unintentional Injury	12 sec	11 sec	20 sec

Columbus Broadcast Breakdown by Station

Category	Columbus Avg.	WCMH (NBC)	WSYX (ABC)	WBNS (CBS)	WTTE (FOX)
Advertising	10 min 25 sec	10 min 11 sec	11 min	10 min 23 sec	9 min 58 sec
Sports and Weather	7 min 28 sec	8 min 12 sec	7 min 52 sec	7 min 52 sec	6 min 50 sec
Crime	3 min	3 min 49 sec	2 min 38 sec	2 min 54 sec	2 min 4 sec
Other	1 min 52 sec	1 min 49 sec	1 min 58 sec	1 min 43 sec	2 min 19 sec
Local Interest	1 min 35 sec	1 min 17 sec	1 min 24 sec	1 min 21 sec	2 min 24 sec
Teasers, Bumpers, Intro	1 min 45 sec	1 min 40 sec	1 min 31 sec	1 min 59 sec	1 min 46 sec
Election Coverage	1 min 1 sec	45 sec	1 min 4 sec	1 min 7 sec	1 min 12 sec
Non-Election Gov't News	1 min 9 sec	1 min 4 sec	1 min 3 sec	1 min 16 sec	1 min 6 sec
Business, Economy	26 sec	26 sec	26 sec	31 sec	41 sec
Health	25 sec	22 sec	33 sec	36 sec	59 sec
World Affairs	15 sec	4 sec	22 sec	9 sec	37 sec
Unintentional Injury	9 sec	19 sec	8 sec	9 sec	7 sec

Cleveland Broadcast Breakdown by Station

Category	Cleveland Avg.	WKYC (NBC)	WEWS (ABC)	WOIO (CBS)	WJW (FOX)
Advertising	9 min 16 sec	9 min 37 sec	9 min 41 sec	9 min 39 sec	9 min 44 sec
Sports and Weather	6 min 43 sec	6 min 54 sec	7 min 15 sec	5 min 5 sec	5 min 48 sec
Crime	3 min 13 sec	2 min 43 sec	2 min 11 sec	5 min 11 sec	3 min 13 sec
Other	2 min 26 sec	2 min 54 sec	2 min 10 sec	2 min 44 sec	2 min 32 sec
Local Interest	2 min	1 min 44 sec	1 min 43 sec	2 min 1 sec	3 min
Teasers, Bumpers, Intro	1 min 50 sec	1 min 45 sec	1 min 47 sec	1 min 27 sec	2 min
Election Coverage	54 sec	42 sec	1 min 47 sec	24 sec	40 sec
Non-Election Gov't News	1 min 16 sec	1 min 15 sec	1 min 14 sec	1 min 30 sec	1 min 2 sec
Business, Economy	45 sec	52 sec	58 sec	48 sec	41 sec
Health	35 sec	54 sec	45 sec	35 sec	42 sec
World Affairs	19 sec	16 sec	18 sec	10 sec	19 sec
Unintentional Injury	18 sec	23 sec	11 sec	26 sec	19 sec

<u>Wisconsin</u>

State Broadcast Breakdown by Market

Category	Five State Avg.	Madison Avg.	Milwaukee Avg.
Advertising	10 min 1 sec	10 min 22 sec	9 min 6 sec
Sports and Weather	7 min 2 sec	7 min 9 sec	6 min 45 sec
Crime	2 min 21 sec	1 min 37 sec	3 min 11 sec
Other	2 min 11 sec	2 min 16 sec	2 min 26 sec
Local Interest	1 min 58 sec	2 min 7 sec	1 min 52 sec
Teasers, Bumpers, Intro	1 min 49 sec	1 min 32 sec	1 min 57 sec
Election Coverage	1 min 6 sec	1 min 39 sec	1 min 10 sec
Non-Election Gov't News	1 min 5 sec	54 sec	1 min 3 sec
Business, Economy	56 sec	47 sec	47 sec
Health	55 sec	1 min 10 sec	58 sec
World Affairs	25 sec	22 sec	35 sec
Unintentional Injury	12 sec	6 sec	11 sec

Madison Broadcast Breakdown by Station

Category	Madison Avg.	WMTV (NBC)	WKOW (ABC)	WISC (CBS)	WMSN (FOX)
Advertising	10 min 21 sec	10 min 7 sec	10 min 5 sec	10 min 28 sec	11 min 24 sec
Sports and Weather	7 min 6 sec	6 min 20 sec	7 min 19 sec	7 min 14 sec	8 min 24 sec
Crime	1 min 8 sec	1 min 30 sec	1 min 47 sec	1 min 32 sec	1 min 44 sec
Other	2 min 6 sec	2 min 10 sec	2 min 29 sec	2 min 20 sec	1 min 53 sec
Local Interest	2 min 23 sec	2 min 2 sec	1 min 48 sec	2 min 53 sec	1 min 49 sec
Teasers, Bumpers, Intro	1 min 39 sec	1 min 47 sec	1 min 27 sec	1 min 35 sec	1 min 4 sec
Election Coverage	1 min 39 sec	1 min 10 sec	1 min 28 sec	1 min 41 sec	51 sec
Non-Election Gov't News	51 sec	59 sec	52 sec	51 sec	54 sec
Business, Economy	41 sec	54 sec	54 sec	32 sec	48 sec
Health	1 min 1 sec	1 min 28 sec	1 min 17 sec	47 sec	1 min 6 sec
World Affairs	22 sec	22 sec	30 sec	6 sec	34 sec
Unintentional Injury	8 sec	13 sec	5 sec	1 sec	1 sec

Milwaukee Broadcast Breakdown by Station

Category	Milwaukee Avg.	WTMJ (NBC)	WISN (ABC)	WDJT (CBS)	WITI (FOX)
Advertising	8 min 59 sec	9 min 37 sec	9 min 6 sec	8 min 34 sec	9 min 2 sec
Sports and Weather	6 min 51 sec	7 min 39 sec	5 min 37 sec	7 min 37 sec	5 min 59 sec
Crime	3 min 9 sec	2 min 4 sec	3 min 11 sec	4 min 32 sec	3 min 1 sec
Other	2 min 18 sec	2 min 29 sec	2 min 36 sec	2 min 7 sec	2 min 34 sec
Local Interest	1 min 45 sec	1 min 45 sec	1 min 52 sec	1 min 30 sec	2 min 28 sec
Teasers, Bumpers, Intro	1 min 55 sec	1 min 30 sec	2 min 46 sec	1 min 7 sec	2 min 31 sec
Election Coverage	1 min 10 sec	1 min 35 sec	1 min 23 sec	51 sec	38 sec
Non-Election Gov't News	1 min 12 sec	58 sec	1 min 2 sec	1 min 14 sec	58 sec
Business, Economy	45 sec	54 sec	31 sec	34 sec	1 min 15 sec
Health	37 sec	53 sec	1 min 20 sec	40 sec	54 sec
World Affairs	39 sec	26 sec	26 sec	59 sec	29 sec
Unintentional Injury	11 sec	10 sec	11 sec	14 sec	11 sec

UW NewsLab Midwest News Index Stations Level Results *Election Coverage By Station* (September 6 – November 6, 2006)

Market	Network	Station	Video Capture Rate	Total Election Stories	Avg Election Time per 30 Min Bcast	Avg Election Story Time	Avg Sound Bite (sec)	Strategy/ Horse Race (%)	Issue (%)	Mention or Focus on Reform (%)	Pres (%)	Sen (%)	House (%)	Gov (%)	Local Races (%)
Chicago	ABC	WLS	100%	155	3 min 7 sec	1 min 35 sec	10	70	17	25	3	1	14	32	23
Chicago	CBS	WBBM	98%	139	2 min 9 sec	1 min 14 sec	8	73	5	17	7	1	17	32	14
Chicago	FOX	WFLD	100%	135	2 min 35 sec	1 min 31 sec	9	68	17	16	3	3	14	28	16
Chicago	NBC	WMAQ	99%	182	2 min 54 sec	1 min 18 sec	8	81	9	15	6	3	18	28	17
Cleveland	ABC	WEWS	100%	231	2 min 53 sec	1 min 8 sec	13	60	17	6	1	20	7	28	2
Cleveland	CBS	WOIO	100%	71	1 min 33 sec	0 min 58 sec	7	58	17	7	0	16	4	10	7
Cleveland	FOX	WJW	98%	57	1 min 30 sec	1 min 22 sec	11	47	14	12	0	11	4	19	2
Cleveland	NBC	WKYC	98%	118	2 min 1 sec	1 min 1 sec	8	55	17	6	1	14	4	11	1
Columbus	ABC	WSYX	98%	151	2 min 29 sec	1 min 7 sec	10	63	13	5	1	11	13	14	4
Columbus	CBS	WBNS	96%	170	1 min 49 sec	0 min 50 sec	9	69	6	7	1	11	13	25	3
Columbus	FOX	WTTE	97%	115	2 min 0 sec	1 min 10 sec	9	61	13	5	2	11	14	10	4
Columbus	NBC	WCMH	98%	111	1 min 29 sec	0 min 54 sec	13	46	23	5	2	13	15	9	5
Detroit	ABC	WXYZ	98%	149	2 min 10 sec	0 min 56 sec	9	78	10	4	0	22	4	52	4
Detroit	FOX	WJBK	97%	55	1 min 47 sec	1 min 17 sec	12	68	20	6	0	13	4	36	2
Detroit	NBC	WDIV	98%	105	2 min 1 sec	1 min 12 sec	7	76	8	2	1	14	3	51	2
Lansing	ABC	WLAJ	100%	99	1 min 21 sec	0 min 43 sec	9	63	29	0	0	15	10	36	4
Lansing	CBS	WLNS	93%	118	1 min 58 sec	1 min 0 sec	15	68	23	2	1	9	7	31	8
Lansing	FOX	WSYM	97%	90	1 min 39 sec	1 min 9 sec	8	59	28	1	0	13	6	34	8
Lansing	NBC	WILX	96%	203	2 min 15 sec	0 min 56 sec	11	62	30	1	15	5	37	8	5
Madison	ABC	WKOW	98%	179	3 min 14 sec	1 min 24 sec	20	56	32	11	1	4	5	29	18
Madison	CBS	WISC	98%	224	3 min 25 sec	1 min 20 sec	12	68	20	6	2	0	5	40	19
Madison	FOX	WMSN	98%	63	2 min 28 sec	1 min 6 sec	11	72	18	13	0	2	3	30	14
Madison	NBC	WMTV	98%	196	3 min 32 sec	1 min 33 sec	56	62	22	14	1	1	3	25	29
Milwaukee	ABC	WISN	96%	174	2 min 52 sec	1 min 26 sec	10	57	17	9	1	2	12	33	21
Milwaukee	CBS	WDJT	93%	169	1 min 58 sec	0 min 55 sec	23	55	28	12	0	2	10	40	11
Milwaukee	FOX	WITI	95%	51	1 min 27 sec	1 min 27 sec	14	51	33	10	0	0	2	40	0
Milwaukee	NBC	WTMJ	95%	145	3 min 4 sec	1 min 32 sec	22	64	18	6	5	1	7	41	22
Minneapolis	ABC	KSTP	99%	161	2 min 46 sec	1 min 11 sec	7	68	13	8	1	11	21	22	5
Minneapolis	CBS	WCCO	99%	146	3 min 6 sec	1 min 23 sec	8	75	9	12	2	12	24	23	3
Minneapolis	FOX	KMSP	100%	107	1 min 57 sec	1 min 18 sec	9	76	11	7	0	11	11	22	10
Minneapolis	NBC	KARE	98%	152	2 min 48 sec	1 min 23 sec	8	76	16	3	1	18	16	22	4
Springfield	ABC	WICS	98%	229	2 min 21 sec	0 min 56 sec	17	63	20	12	2	0	10	49	16
Springfield	CBS	WCIA	98%	107	1 min 18 sec	0 min 43 sec	9	73	14	15	8	1	8	38	16
Springfield	FOX	WRSP	100%	71	2 min 36 sec	1 min 4 sec	12	53	28	9	1	0	1	31	21
Springfield	NBC	WAND	98%	132	1 min 40 sec	0 min 52 sec	13	54	27	17	2	1	11	48	9

Government News Coverage

January 1-March 31, 2007

Key Finding: During the first quarter of 2007, the 36 television stations monitored by the UW NewsLab dedicated just one minute and 35 seconds to government news during a typical 30-minute news broadcast. In contrast, five times more airtime was spent on "sports and weather." Crime stories, averaging 2 minutes 13 seconds, also trumped government coverage as did "teasers, bumpers, and intros" at nearly 2 minutes. (These findings are based on an analysis of 1,800 broadcasts (over 900 hours of programming), including 2,797 government news stories and 258 stories on elections.)

Advertising	9 min 12 sec
Sports and weather	7 min 41 sec
Other	2 min 16 sec
Crime	2 min 13 sec
Local interest	2 min 11 sec
Teasers, bumpers, intros	1 min 57 sec
Non alerting Court Norm	1 . 25
Non-election Gov't News	1 min 35 sec
Business, economy	1 min 35 sec 1 min 2 sec
Business, economy	1 min 2 sec
Business, economy Health	1 min 2 sec 52 sec

Typical 30 Minute Broadcast Breakdown

Other findings:

- When advertising, which accounts for more than 9 minutes of a typical newscast, is factored out, the amount of government news, as a percentage of all news, within the nine markets ranged on average between 5.4 and 11 percent (Detroit and Milwaukee—5.5%; Chicago, Cleveland, Madison, and Minneapolis-St. Paul—7%; Columbus—8%; and Lansing and Springfield—11%)
- The 1 minute 35 seconds devoted to government coverage in a typical 30-minute local TV newscast was fairly evenly spread among all levels of government: on average 32 percent federal, 26 percent state, and 23 percent local, with stories involving more than one level of government accounting for another 19 percent.
- President Bush was mentioned in 26 percent of all government stories, while 21 percent mentioned the U.S. Senate and 17 percent mentioned the House of Representatives.
- 18 percent of government stories mentioned or focused on a piece of legislation, and five percent of those stories dealt with education and 11 percent with health care legislation.

- At the state level, 17 percent of government stories referenced governors while 12 percent mentioned state legislatures.
- About 4 percent of stories mentioned or focused on political reform and 8 percent on scandal.
- The television markets in which four state capitals are located—Springfield, Lansing, Columbus, and Madison—provided more government news coverage than the stations in the much larger Chicago, Detroit, Cleveland and Milwaukee markets.

<u>Illinois</u>

State Broadcast Breakdown by Market

Category	Five State Avg.	Chicago	Springfield
Advertising	9 min 12 sec	8 min 45 sec	9 min 31 sec
Sports and Weather	7 min 41 sec	7 min 43 sec	7 min 37 sec
Other	2 min 16 sec	2 min 24 sec	1 min 37 sec
Crime	2 min 13 sec	2 min 2 sec	1 min 29 sec
Local Interest	2 min 11 sec	2 min 11 sec	2 min 35 sec
Teasers, Bumpers, Intros	1 min 57 sec	2 min 11 sec	2 min 7 sec
Non-election Gov't News	1 min 35 sec	1 min 33 sec	2 min 17 sec
Business, Economy	1 min 3 sec	46 sec	1 min 1 sec
Health	52 sec	52 sec	55 sec
World Affairs	24 sec	25 sec	14 sec
Election Coverage	20 sec	56 sec	30 sec
Unintentional Injury	16 sec	12 sec	8 sec

Chicago Broadcast Breakdown by Station

Category	Chicago Avg.	WMAQ (NBC)	WLS (ABC)	WBBM (CBS)	WFLD (FOX)
Advertising	8 min 45 sec	9 min 25 sec	8 min 7 sec	8 min 45 sec	8 min 42 sec
Sports and Weather	7 min 43 sec	7 min 56 sec	8 min 13 sec	8 min 32 sec	6 min 13 sec
Other	2 min 24 sec	2 min 7 sec	2 min 39 sec	2 min 16 sec	2 min 33 sec
Crime	2 min 2 sec	1 min 43 sec	2 min 21 sec	1 min 55 sec	2 min 9 sec
Local Interest	2 min 11 sec	1 min 42 sec	2 min 23 sec	1 min 47 sec	2 min 52 sec
Teasers, Bumpers, Intros	2 min 11 sec	2 min 6 sec	2 min 12 sec	2 min 6 sec	2 min 20 sec
Non-election Gov't News	1 min 33 sec	1 min 41 sec	1 min 31 sec	1 min 12 sec	1 min 45 sec
Business, Economy	46 sec	36 sec	47 sec	54 sec	48 sec
Health	52 sec	1 min 1 sec	32 sec	1 min 12 sec	44 sec
World Affairs	25 sec	31 sec	26 sec	26 sec	18 sec
Election Coverage	56 sec	1 min 1 sec	46 sec	29 sec	1 min 28 sec
Unintentional Injury	12 sec	11 sec	4 sec	26 sec	8 sec

Springfield Broadcast Breakdown by Station

Category	Springfield Avg.	WAND (NBC)	WICS (ABC)	WCIA (CBS)	WRSP (FOX)
Advertising	9 min 31 sec	9 min 19 sec	9 min 23 sec	9 min 53 sec	9 min 33 sec
Sports and Weather	7 min 37 sec	8 min 33 sec	7 min 46 sec	7 min 13 sec	5 min 59 sec
Other	1 min 37 sec	1 min 55 sec	1 min 14 sec	2 min 4 sec	47 sec
Crime	1 min 29 sec	1 min 29 sec	1 min 35 sec	1 min 21 sec	1 min 33 sec
Local Interest	2 min 35 sec	2 min 7 sec	2 min 29 sec	3 min 3 sec	2 min 56 sec
Teasers, Bumpers, Intros	2 min 7 sec	1 min 38 sec	2 min 3 sec	2 min 27 sec	2 min 45 sec
Non-election Gov't News	2 min 17 sec	2 min 24 sec	2 min 38 sec	1 min 42 sec	2 min 26 sec
Business, Economy	1 min 1 sec	1 min 3 sec	1 min 4 sec	56 sec	56 sec
Health	55 sec	56 sec	36 sec	48 sec	1 min 45 sec
World Affairs	14 sec	8 sec	15 sec	18 sec	21 sec
Election Coverage	30 sec	21 sec	50 sec	8 sec	53 sec
Unintentional Injury	8 sec	9 sec	8 sec	6 sec	7 sec

<u>Michigan</u>

State Broadcast Breakdown by Market

Category	Five State Avg.	Detroit	Lansing
Advertising	9 min 12 sec	9 min 45 sec	9 min 45 sec
Sports and Weather	7 min 41 sec	7 min 7 sec	8 min 2 sec
Other	2 min 16 sec	2 min 24 sec	1 min 30 sec
Crime	2 min 13 sec	2 min 31 sec	1 min 20 sec
Local Interest	2 min 11 sec	2 min 29 sec	2 min 6 sec
Teasers, Bumpers, Intros	1 min 57 sec	1 min 40 sec	1 min 47 sec
Non-election Gov't News	1 min 35 sec	1 min 6 sec	2 min 12 sec
Business, Economy	1 min 3 sec	1 min 44 sec	1 min 50 sec
Health	52 sec	42 sec	41 sec
World Affairs	24 sec	18 sec	29 sec
Election Coverage	20 sec	5 sec	8 sec
Unintentional Injury	16 sec	10 sec	9 sec

Detroit Broadcast Breakdown by Station

Category	WDIV (NBC)	WXYZ (ABC)	WJBK (FOX)
Advertising	9 min 37 sec	10 min 28 sec	9 min 12 sec
Sports and Weather	7 min 36 sec	7 min 7 sec	6 min 31 sec
Other	2 min 30 sec	2 min 44 sec	1 min 54 sec
Crime	2 min 10 sec	2 min 53 sec	2 min 33 sec
Local Interest	2 min 1 sec	1 min 41 sec	3 min 54 sec
Teasers, Bumpers, Intros	1 min 44 sec	1 min 10 sec	2 min 5 sec
Non-election Gov't News	1 min 12 sec	1 min 14 sec	52 sec
Business, Economy	1 min 51 sec	2 min 8 sec	1 min 10 sec
Health	46 sec	10 sec	1 min 8 sec
World Affairs	11 sec	19 sec	26 sec
Election Coverage	8 sec	1 sec	6 sec
Unintentional Injury	14 sec	4 sec	10 sec

Lansing Broadcast Breakdown by Station

Category	WLAJ (ABC)	WLNS (CBS)	WSYM (FOX)	WILX (NBC)
Advertising	5 min 47 sec	9 min 35 sec	10 min 5 sec	10 min 43 sec
Sports and Weather	5 min 9 sec	9 min 25 sec	6 min 5 sec	8 min 57 sec
Other	1 min 53 sec	1 min 42 sec	1 min 19 sec	1 min 21 sec
Crime	2 min 35 sec	1 min 18 sec	1 min 20 sec	1 min 4 sec
Local Interest	3 min 6 sec	1 min 55 sec	2 min 35 sec	1 min 35 sec
Teasers, Bumpers, Intros	1 min 57 sec	1 min 41 sec	2 min 3 sec	1 min 35 sec
Non-election Gov't News	4 min 26 sec	1 min 34 sec	2 min 8 sec	2 min 24 sec
Business, Economy	4 min 10 sec	1 min 18 sec	2 min 42 sec	1 min 2 sec
Health	29 sec	44 sec	41 sec	41 sec
World Affairs	4 sec	33 sec	40 sec	22 sec
Election Coverage	2 sec	6 sec	14 sec	6 sec
Unintentional Injury	23 sec	8 sec	8 sec	9 sec

Minnesota

State Broadcast Breakdown by Market

Category	Five State Avg.	Minneapolis/St. Paul
Advertising	9 min 12 sec	9 min
Sports and Weather	7 min 41 sec	6 min 54 sec
Other	2 min 16 sec	3 min 11 sec
Crime	2 min 13 sec	1 min 53 sec
Local Interest	2 min 11 sec	2 min 4 sec
Teasers, Bumpers, Intros	1 min 57 sec	2 min 4 sec
Non-election Gov't News	1 min 35 sec	1 min 26 sec
Business, Economy	1 min 3 sec	1 min
Health	52 sec	1 min 13 sec
World Affairs	24 sec	38 sec
Election Coverage	20 sec	8 sec
Unintentional Injury	16 sec	30 sec

Minneapolis/St. Paul Broadcast Breakdown by Station

Category	KARE (NBC)	KSTP (ABC)	WCCO (CBS)	KMSP (FOX)
Advertising	9 min 25 sec	9 min 2 sec	9 min 8 sec	8 min 4 sec
Sports and Weather	7 min 10 sec	7 min 4 sec	7 min 27 sec	5 min 32 sec
Other	3 min 7 sec	3 min 23 sec	2 min 55 sec	3 min 26 sec
Crime	1 min 50 sec	2 min 24 sec	1 min 15 sec	2 min 15 sec
Local Interest	1 min 55 sec	1 min 30 sec	2 min 10 sec	2 min 47 sec
Teasers, Bumpers, Intros	2 min 1 sec	1 min 48 sec	1 min 48 sec	2 min 51 sec
Non-election Gov't News	1 min 21 sec	1 min 35 sec	1 min 29 sec	1 min 20 sec
Business, Economy	1 min 5 sec	1 min	1 min 1 sec	48 sec
Health	1 min 4 sec	47 sec	1 min 30 sec	1 min 37 sec
World Affairs	27 sec	53 sec	39 sec	38 sec
Election Coverage	9 sec	8 sec	4 sec	10 sec
Unintentional Injury	27 sec	26 sec	34 sec	32 sec

<u>Ohio</u>

State Broadcast Breakdown by Market

Category	Five State Avg.	Columbus	Cleveland
Advertising	9 min 12 sec	9 min 17 sec	8 min 53 sec
Sports and Weather	7 min 41 sec	8 min 42 sec	7 min 47 sec
Other	2 min 16 sec	2 min 7 sec	2 min 33 sec
Crime	2 min 13 sec	2 min 49 sec	2 min 54 sec
Local Interest	2 min 11 sec	1 min 39 sec	2 min 16 sec
Teasers, Bumpers, Intros	1 min 57 sec	1 min 60 sec	1 min 57 sec
Non-election Gov't News	1 min 35 sec	1 min 43 sec	1 min 29 sec
Business, Economy	1 min 3 sec	37 sec	48 sec
Health	52 sec	29 sec	45 sec
World Affairs	24 sec	16 sec	16 sec
Election Coverage	20 sec	7 sec	8 sec
Unintentional Injury	16 sec	14 sec	16 sec

Columbus Broadcast Breakdown by Station

Category	WCMH (NBC)	WSYX (ABC)	WBNS (CBS)	WTTE (FOX)
Advertising	8 min 26 sec	10 min 1 sec	9 min 11 sec	9 min 24 sec
Sports and Weather	9 min 29 sec	8 min 48 sec	8 min 17 sec	6 min 44 sec
Other	2 min 19 sec	1 min 56 sec	2 min 1 sec	2 min 23 sec
Crime	3 min 22 sec	2 min 12 sec	3 min 21 sec	2 min 13 sec
Local Interest	1 min 16 sec	1 min 31 sec	1 min 45 sec	3 min 21 sec
Teasers, Bumpers, Intros	1 min 56 sec	1 min 55 sec	2 min 13 sec	2 min 3 sec
Non-election Gov't News	1 min 24 sec	1 min 51 sec	1 min 51 sec	1 min 54 sec
Business, Economy	55 sec	28 sec	22 sec	45 sec
Health	26 sec	33 sec	21 sec	39 sec
World Affairs	6 sec	20 sec	20 sec	26 sec
Election Coverage	5 sec	10 sec	8 sec	2 sec
Unintentional Injury	16 sec	16 sec	10 sec	6 sec

Cleveland Broadcast Breakdown by Station

Category	WKYC (NBC)	WEWS (ABC)	WOIO (CBS)	WJW (FOX)
Advertising	8 min 15 sec	8 min 54 sec	6 min 37 sec	9 min 25 sec
Sports and Weather	8 min 26 sec	8 min 59 sec	9 min 42 sec	6 min 1 sec
Other	3 min 7 sec	2 min 13 sec	1 min 17 sec	2 min 58 sec
Crime	2 min 36 sec	2 min	3 min 15 sec	2 min 46 sec
Local Interest	1 min 44 sec	2 min 3 sec	1 min 30 sec	3 min 37 sec
Teasers, Bumpers, Intros	1 min 53 sec	1 min 59 sec	1 min 14 sec	2 min 13 sec
Non-election Gov't News	1 min 25 sec	1 min 40 sec	1 min 15 sec	57 sec
Business, Economy	56 sec	55 sec	19 sec	46 sec
Health	1 min 2 sec	40 sec	31 sec	24 sec
World Affairs	11 sec	19 sec	3 sec	31 sec
Election Coverage	8 sec	10 sec	0 sec	13 sec
Unintentional Injury	16 sec	9 sec	22 sec	10 sec

Wisconsin

State Broadcast Breakdown by Market

Category	Five State Avg.	Madison	Milwaukee
Advertising	9 min 12 sec	9 min 50 sec	8 min 30 sec
Sports and Weather	7 min 41 sec	8 min 6 sec	7 min 28 sec
Other	2 min 16 sec	1 min 55 sec	2 min 29 sec
Crime	2 min 13 sec	1 min 30 sec	3 min 34 sec
Local Interest	2 min 11 sec	2 min 2 sec	2 min 11 sec
Teasers, Bumpers, Intros	1 min 57 sec	1 min 31 sec	2 min 4 sec
Non-election Gov't News	1 min 35 sec	1 min 24 sec	1 min 11 sec
Business, Economy	1 min 3 sec	1 min 12 sec	50 sec
Health	52 sec	1 min 19 sec	42 sec
World Affairs	24 sec	31 sec	26 sec
Election Coverage	20 sec	29 sec	10 sec
Unintentional Injury	16 sec	12 sec	25 sec

Madison Broadcast Breakdown by Station

Category	WMTV (NBC)	WKOW (ABC)	WISC (CBS)	WMSN (FOX)
Advertising	9 min 38 sec	9 min 34 sec	9 min 19 sec	10 min 57 sec
Sports and Weather	7 min 24 sec	8 min 41 sec	8 min 6 sec	8 min 7 sec
Other	1 min 46 sec	1 min 45 sec	2 min 23 sec	1 min 43 sec
Crime	1 min 56 sec	1 min 7 sec	1 min 35 sec	1 min 25 sec
Local Interest	2 min 20 sec	1 min 38 sec	2 min 23 sec	1 min 48 sec
Teasers, Bumpers, Intros	1 min 45 sec	1 min 24 sec	1 min 45 sec	1 min 5 sec
Non-election Gov't News	1 min 16 sec	1 min 38 sec	1 min 33 sec	1 min
Business, Economy	1 min 4 sec	1 min 39 sec	50 sec	1 min 9 sec
Health	2 min 8 sec	1 min 2 sec	52 sec	1 min 20 sec
World Affairs	15 sec	41 sec	28 sec	37 sec
Election Coverage	12 sec	27 sec	39 sec	38 sec
Unintentional Injury	17 sec	13 sec	7 sec	11 sec

Milwaukee Broadcast Breakdown by Station

Category	WTMJ (NBC)	WISN (ABC)	WDJT (CBS)	WITI (FOX)
Advertising	9 min 14 sec	8 min 47 sec	7 min 46 sec	7 min 37 sec
Sports and Weather	8 min 22 sec	6 min 12 sec	8 min 32 sec	6 min 24 sec
Other	2 min 30 sec	2 min 48 sec	2 min 10 sec	2 min 26 sec
Crime	2 min 43 sec	3 min 19 sec	4 min 33 sec	4 min 18 sec
Local Interest	2 min 6 sec	1 min 56 sec	1 min 36 sec	3 min 15 sec
Teasers, Bumpers, Intros	1 min 32 sec	2 min 46 sec	1 min 11 sec	3 min 1 sec
Non-election Gov't News	1 min 5 sec	1 min 8 sec	1 min 31 sec	1 min 6 sec
Business, Economy	51 sec	56 sec	51 sec	42 sec
Health	44 sec	55 sec	21 sec	45 sec
World Affairs	16 sec	35 sec	46 sec	10 sec
Election Coverage	10 sec	17 sec	5 sec	6 sec
Unintentional Injury	28 sec	21 sec	37 sec	10 sec

Certificate of Service

I, Parul Desai, hereby certify that on this 13th day of July 2007, a copy of the foregoing *Petition for Reconsideration*, was served by first-class mail, postage prepaid, upon the following:

F. William Lebeau NBC Telemundo License Co. 1299 Pennsylvania Avenue, NW 11th Floor Washington, DC 20004 *WSNS-TV WMAQ-TV*

John W. Zucker ABC, Inc. 77 West 66th Street 16th Floor New York, NY 1023-6298 *WLS-TV*

R. Clark Wadlow Sidley Austin Brown & Wood 1501 K Street, NW Washington, DC 20005 *WGN-TV*

J. Brian DeBoice Cohn and Marks, LLP 1920 N Street, NW Suite 300 Washington, DC 20036-1622 *WCIU-TV WDJT-TV WMLW-TV*

Mace J. Rosenstein Hogan & Hartson LLP 555 13th Street, NW Washington, DC 20004-1109 *WTMJ-TV*

Mark J. Prak Brooks Pierce McLendon Humphrey & Leonard LLP PO Box 1800 Raleigh, NC 27602 *WISN-TV* Richard R. Zaragoza Pillsbury Winthrop Shaw Pittman 2300 N Street, NW Washington, DC 20037-1128 *Illinois Broadcasters Association Wisconsin Broadcasters Association*

Kathryn R. Schmeltzer Pillsbury Winthrop Shaw Pittman 2300 N Street, NW Washington, DC 20037-1128 *WCGV-TV WVTV-TV*

Howard F. Jaeckel CBS Inc. 1515 Broadway New York, New York 10036 *WBBM-TV*

Colby M. May Law Offices of Colby M. May 205 Third Street, SE Washington, DC 20003 *WWRS-TV*

John C. Quale Skadden, Arps, Slate, Meagher & Flom LLP 1440 New York Avenue, NW Washington, DC 20016 *WFLD-TV WPWR-TV WITI-TV*

Denise B. Moline Law Offices of Denise B. Moline 1212 South Naper Boulevard Suite 119-215 Naperville, IL 60540 *WJJA-TV* James R. Bayes Wayne D. Johnsen Wiley Rein & Fielding LLP 1776 K Street, NW Washington, DC 20006 *WVCY-TV* John R. Feore, Jr. M. Ann Swanson Dow, Lohnes & Albertson, PLLC 1200 New Hampshire Ave, NW Suite 800 Washington, DC 20036 *WCPX-TV WPXE-TV*

Parul Desai