



King County

Dow Constantine

King County Executive

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November 21, 2017

Ajit Pai

Chairman

Federal Communications Commission

445 12th St. SW

Washington, DC 20554

Dear Chairman Pai:

I am the elected Executive of King County, Washington. King County, including Seattle, is one of the largest regional governments in the United States, and the most populous county in Washington with a metropolitan population (2016) of more than 2.1 million.

For many years, King County has been well served by multiple diverse locally-based broadcast news teams and studios, including the local studios and news teams of KOMO TV (owned by Sinclair Broadcast Group) and KCPQ (Q13) (owned by Tribune Media).

I am concerned regarding Sinclair's announced a \$3.9 billion acquisition of Tribune, potentially creating the largest single group of local broadcast stations under common ownership in the USA, and bringing KOMO TV (Seattle) under common ownership with KCPQ (Q13). Not only is this transaction contrary to longstanding public interests in local ownership, diversity in broadcasting and marketplace competition, but, according to published documentation, Sinclair has a history of cutting back local newsrooms and content in favor of politically-slanted editorials and "must run" segments of questionable journalistic objectivity.

I am particularly concerned that this transaction will place two separate and currently-independent local broadcast studios and news teams at risk. Specifically, such consolidation risks either (1) significant domination of local King County broadcast news in accordance with Sinclair's slanted political views, or else (2) elimination of an existing King County broadcast studio (KOMO or KCPQ) to "consolidate" news coverage at the expense of local television viewers who rightfully expect that the public airwaves continue to carry independent, television content, including local broadcast news. The FCC's elimination (last month) of its longstanding Main Studio rule requiring broadcasters to have a physical studio in or near their broadcast areas, which previously provided some assurance that King County

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residents would have a say in their local broadcast station's operations, lends added urgency to our concerns. This is even more critical when it is realized that, according to the Pew Research Center, local broadcasting continues to be relied on by citizens ahead of network and cable for breaking news, including vital real-time information affecting lives and property.

I join with the Attorneys General of Illinois, Maryland, Massachusetts, and Rhode Island in opposing the proposed merger of Sinclair with Tribune Media as inimical to the public interest and antithetical to the needs and interests of television viewers in King County. To paraphrase Judge (soon to be Chief Justice) Warren E. Burger (in the 1969 WLBT case) it is the rights of viewers that should be paramount, and after nearly a century of operation the broadcast industry and FCC should grasp “the simple fact that a broadcast license is a public trust subject to termination for breach of duty.”

Thank you for considering my comments.

Sincerely,

A handwritten signature in black ink that reads "Dow Constantine". The signature is written in a cursive, flowing style with a prominent underline.

Dow Constantine
King County Executive

cc: Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel