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January 31, 2011

FILED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Re: MB Docket No. 10-104
Ex parte

Dear Ms. Dortch:

On January 10, 2011, the Tribune Company, Debtor-in-Possession ("Tribune") filed a letter in the above-referenced proceeding in which it reported that bankruptcy court procedures are in place for considering plans of reorganization under which Tribune and its debtor-in-possession subsidiaries would emerge from bankruptcy. Although these plans of reorganization were not before the bankruptcy court when Tribune filed its assignment of license application in this proceeding (the "Application"), Tribune maintains that the terms of the new plans of reorganization do not represent a material change for FCC processing purposes.

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Whether the plans of reorganization should be deemed a material change or not, the International Brotherhood of Teamsters ("IBT") notes that the plans are not responsive to IBT's objections to the Application. IBT demonstrated in its Petition to Deny and in its Reply in this matter that it violates Communications Act requirements and Commission precedent for the Tribune's employees to be the owners of the company, through the Tribune ESOP Plan, but for a third party, Sam Zell, to have control of the Tribune and its board and to have decision-making authority over the filing and prosecution of the Application. Neither the Tribune nor the Unsecured Creditors ever attempted to show otherwise, and the new plans of reorganization have no impact on this issue. Accordingly, and as IBT requested previously, the Commission should deny the Application or hold it in abeyance until Tribune's board has been reconstituted in accordance with Commission requirements and the reconstituted board has had an opportunity to pass upon the Application.¹

Sincerely,

/s/ Joseph A. Godles

*Counsel to International Brotherhood of
Teamsters*

¹ IBT also demonstrated in its filings that the Commission should deny the newspaper/broadcast cross-ownership waiver requests for the Chicago and Hartford-New Haven markets.