

September 14, 2017

The Hon. Rhonda K. Schmidlein, Chairman  
The Hon. David S. Johanson, Vice Chairman  
The Hon. Irving Williamson, Commissioner  
The Hon. Meredith Broadbent, Commissioner  
United States International Trade Commission  
500 E Street, S.W.  
Washington, D.C. 20436

Re: *Uncoated Groundwood Paper from Canada, Inv. No. 701-TA-584 and 731-TA-1382*

Dear Chairman Schmidlein and Commissioners Johanson, Williamson and Broadbent:

As publishers of more than 1,350 newspapers across the United States, we urge you to vote against any further action in the above-captioned matter. The allegations by North Pacific Paper Company ("Norpac") are extremely troubling, and accepting them would endanger our ability to continue providing high-quality local journalism in communities across our country.

This matter could have a widespread negative impact on newspaper publishers in every community in the United States. This result is not justified by the supposed damage that is claimed by Norpac, which operates one sole paper mill in Longview, Washington.


To understand the seriousness of this issue to newspapers, it is necessary to understand the delicate posture in which the newspaper industry operates in today's world. We are in the midst of a years-long process of our reader base shifting to digital platforms and adapting to a new and intensely challenging digital advertising environment. Although our digital readership is higher than it has ever been, it continues to be the print readership (and print advertising) that largely supports the journalism we produce. But of course, print is declining during this digital transformation. Because print subscriptions have declined by more than 30 percent over the last 10 years, our industry is necessarily using less paper. This is simply a fact of life in the digital ecosystem. It has nothing at all to do with trade issues, but everything to do with the digital reality of publishing in 2017.


If the Commission were to accept Norpac's unprecedented and protectionist demands to impose excessive import duties, that decision would wreak havoc within the publishing industry. During this transition to digital, many of the news properties in our industry are operating on the slimmest of margins in efforts to continue producing the high-quality news and information content that our communities deserve. If Norpac or other domestic manufacturers raises its own prices to take advantage of the supply disruptions caused by the duties, newspapers would have no choice but to increase subscription prices. These price increases would, in turn, cause additional subscribers to abandon print subscriptions overnight. The lost revenues from these print subscriptions will undermine our ability to continue paying our 175,000 employees, including reporters, writers, photographers and editors, in communities across our country, which could result in a net job loss in the United States. As print subscriptions decline at an even faster rate, our ability to continue to invest in local journalism will be endangered. This would, in turn, result in decreased demand for Norpac's product and, in very little time, result in Norpac itself having a much smaller market for its products. In short, no one would win; all of us, including Norpac, would lose. The greatest loss of all would be felt by the American public, which would lose access to a steady and reliable flow of professionally edited news and information.

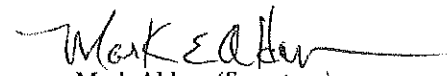
The Norpac demand is the wrong public policy result, and the wrong way to approach the complex issues presented by the newsprint and newspaper industries. Please stop this investigation in its tracks today, before it does more damage to the American newspaper industry.


We very much appreciate your consideration of our views.


Respectfully submitted,

  
Michael J. Klingensmith (Chairman)  
Publisher & CEO  
Star Tribune


  
Terry Kroeger (Vice Chairman)  
President, CEO & Publisher  
BH Media Group


  
Mark Aldam (Secretary)  
President  
Hearst Newspapers


  
Anna Sedgley (Treasurer)  
Chief Financial & Operation Officer  
Dow Jones & Company Inc

  
Donna Barrett (Past Chairman)  
President & CEO  
Community Newspaper Holdings Inc


  
Kevin Mowbray  
President & CEO  
Lee Enterprises Inc


  
Mark Newhouse  
EVP, Newspapers  
Advance Publications Inc

  
Michael G. Abernathy  
President  
Landmark Community Newspapers


  
Antoinette Bush  
EVP, Global Head of Gov't Affairs  
News Corp/ Down Jones Company

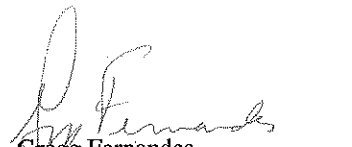
  
Edward Bushey  
Co-Publisher & General Manager  
Newsday Media Group


  
Roland A. Caputo  
EVP, Print Products and Services  
The New York Times


  
Ann Caulkins  
President & Publisher  
The Charlotte Observer

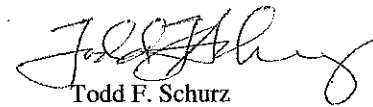
  
Kirk A. Davis  
Chief Executive Officer  
GateHouse Media LLC

  
Justin C. Dearborn  
CEO & Director  
tronc, Inc.

  
Gregg Fernandes  
VP, Customer Care & Logistics  
The Washington Post

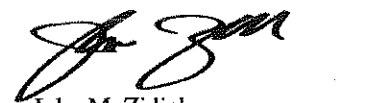
  
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