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January 23, 2017

Jeff S. Jordan, Esq.  
Assistant General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

RE: MUR 7206 – Bonneville International Corporation

Dear Mr. Jordan:

We are submitting this letter on behalf of Bonneville International Corporation ("Bonneville"), which also does business as KSL-TV and KSL 1160, in response to the complaint filed by Robert Breeze. Mr. Breeze weaves an imaginary tale of conspiracy based on innuendo and an erroneous understanding of the law to allege that coverage of Evan McMullin's 2016 campaign for President constituted an unreported contribution/expenditure.

Mr. Breeze argues that Bonneville's coverage was intended to promote Mr. McMullin's candidacy. In support of that argument, Mr. Breeze asserts that (1) Bonneville is owned by the Church of Jesus Christ of Latter-day Saints, of which Mr. McMullin is a member, and (2) Bonneville gave more coverage to Mr. McMullin than the third-party candidates Gary Johnson and Jill Stein.

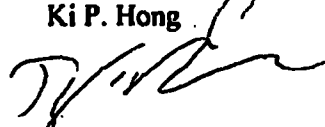
Bonneville's coverage of elections, including the 2016 election, is unbiased and fair to all candidates. Bonneville has existed and been in the business of owning and operating radio and television stations for more than 40 years, and KSL-TV and KSL 1160 date back to 1949 and 1922 respectively. Both are in the business of producing and broadcasting news and other media content. As it always does, KSL-TV and KSL 1160 covered the presidential election of 2016 by using its independent editorial judgment to determine what is newsworthy. This includes coverage of all major candidates.

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Mr. Breeze also fundamentally misunderstands the media exemption set forth under the Federal Election Campaign Act of 1971, as amended,<sup>1</sup> which applies to commentary and editorials in addition to bona fide news stories. Bonneville was, and continues to act as, an independent media company covering and editorializing on important news of the day, such as the elections, and thus clearly falls within this exemption. There is no proportionality or equal time requirement, as suggested by Mr. Breeze. It is interesting that Mr. Breeze compares the quantity of coverage of Mr. McMullin only to Mr. Johnson and Ms. Stein and not Donald Trump or Hillary Clinton. Finally, given that the Church of Jesus Christ of Latter-day Saints is not a campaign or party committee, its ownership interest in Bonneville is irrelevant. To claim that Mr. McMullen's membership in that Church suggests that Bonneville was attempting to help his election is the height of irresponsible speculation and innuendo.

For the foregoing reasons, the Commission should not take any further action against Bonneville.

Sincerely,

  
  
Ki P. Hong  
Tyler Rosen

Attorneys for Bonneville International  
Corporation

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<sup>1</sup> 52 U.S.C. § 30101(9)(B)(i).

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