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January 23, 2017

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

**Re: Notice of Ex Parte Communication and Support of Expansion of Minority
Ownership:**

MB Docket No. 14-50, 2014 Quadrennial Regulatory Review

MB Docket No. 09-182, 2010 Quadrennial Regulatory Review

MB Docket No. 07-294, Promoting Diversification of Ownership

***MB Docket No. 04-256, Attribution of Joint Sales Agreements in Local
Television Markets***

Dear Ms. Dortch:

On January 19, 2017, Armstrong Williams, the sole owner of Howard Stirk Holdings, LLC ("HSH I"), and Howard Stick Holdings II, LLC ("HSH II") (collectively "HSH")¹, met with Commissioner Ajit Pai and his Chief of Staff, Matthew Berry, to discuss enhancement of broadcast ownership by minorities and the Commission's pending reconsideration of the above-referenced proceeding. Also in the meeting were David Smith, Executive Chairman, and Christopher Ripley, President & CEO, of group owner Sinclair Television Group, Inc.

In the meeting, Mr. Williams explained his view that the Commission needs to address the continuing paucity of minority and new entrant broadcast ownership. For example, HSH represents one of only two television station licensee enterprises owned by African American owned companies in the United States today. HSH I acquired and operates its stations using Joint

¹ The wholly owned, sole member companies of HSH are: HSH Flint (WEYI-TV) Licensee, LLC, licensee of WEYI-TV, Saginaw/Flint, MI; HSH Myrtle Beach (WWMB-TV) Licensee, LLC, licensee of WWMB-TV, Florence, SC; HSH Birmingham (WSES & WGWW) Licensee, LLC, licensee of WSES(TV), Tuscaloosa and WGWW(TV), Anniston, AL; HSH Charleston (WCIV) Licensee, LLC, licensee of WGWW(TV), Charleston, SC; HSH Lancaster (WLYH) Licensee, LLC, licensee of WXBW, Lancaster, PA; and Channel 33, Inc., licensee of KHSV(TV), Las Vegas, NV.

Sales Agreements (JSA) and Shared Services Agreements (SSA). Mr. Williams emphasized that without the ability to enter into JSAs and SSAs, as an African American, he would not have been able to fulfill his lifelong dream of being a TV station owner at the time HSH I acquired its stations.

HSH I's shared services agreements allowed Mr. Williams to obtain access to capital that would have otherwise been unavailable to him, and that access to capital and financing are the single biggest obstacles to new entrant and minority ownership. Singleton buyers of a TV station, especially in small and medium size markets, simply cannot get financing without these types of shared services agreements. In HSH I's experience, shared services arrangements provided the only means over that obstacle, and accordingly advance diversity, open opportunity, and generally serve the larger public interest.

It was further noted that HSH II's stations, which are not able to have any JSAs under the current JSA Attribution and duopoly rules, are financially tested and face ongoing revenue and cost challenges in the absence of being able to structure promotions that compete with the larger media marketplace and national outlets. Until March 2014 shared services arrangements were widely used for more than a decade, and had been scrutinized and shaped by the Commission and its staff to insure compliance with the duopoly and ownership rules. Minority and new entrant opportunity and operational success would again be aided, as was Mr. Williams initial experience, if JSAs were again permitted.

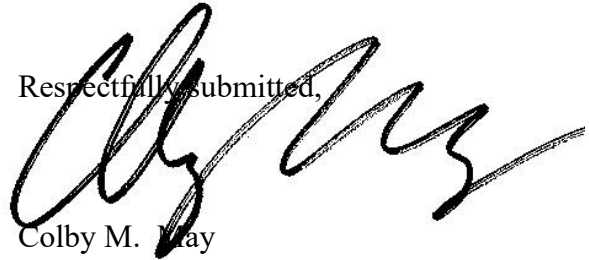
Mr. Williams further shared some of the unique local programming efforts HSH has undertaken since acquiring its stations, and referred Commissioner Pai to HSH's YouTube story found at: <http://www.youtube.com/watch?v=S92kkmujBUY&feature=youtu.be>. A copy of the attached organizational and programming information on HSH was also provided.

Mr. Williams also emphasized that his permitted JSA and SSA arrangements were working well and helped insure essential access to capital, financing, and successful station operations. These are invaluable and effective tools which were taken away by the Commission in the current Quadrennial Review, but which should again be allowed in order to enhance diversity of ownership and content, and help save and enhance local programming and advanced the larger public interest with a focus on local service.

Ms. Marlene H. Dortch
Federal Communications Commission
January 23, 2017
page 3

In accordance with Section 1.1206(b) the Commission's rules, this notice is being filed in the Commission's Electronic Comment Filing System.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Colby M. May', is written over the text 'Respectfully submitted,'.

Colby M. May
Attorney for Howard Stirk Holdings, LLC
and Howard Stirk Holdings II, LLC

CMM/gmc

Encl.

cc: Commissioner Ajit Pai
Matthew Berry

HSH

AN ARMSTRONG WILLIAMS COMPANY

WELCOME

WHO IS HSH?

HOWARD STIRK HOLDINGS (HSH) CREATES MULTIFARIOUS CONTENT RELATIVE TO POLITICS, ENTERTAINMENT AND TOPICS OF SOCIAL AND CULTURAL RELEVANCE. FOUNDED BY ENTREPRENEUR, AMERICAN POLITICAL COMMENTATOR, AUTHOR, AND NATIONALLY SYNDICATED WRITER **ARMSTRONG WILLIAMS**. WITH SEVEN TELEVISION STATIONS AS SUBSIDIARIES AND PLANS FOR GROWTH, HSH DESIGNATES **ARMSTRONG WILLIAMS** AS THE LARGEST MINORITY OWNER OF BROADCAST TELEVISION STATIONS IN THE UNITED STATES, WHICH CURRENTLY CONTAINS LESS THAN **2%** MINORITY OWNERSHIP.

AS A BROADCAST TELEVISION OWNER AND HOST OF SUCH SHOWS AS, **"THE RIGHT SIDE FORUM"** AND THE, **"RIGHT SIDE WITH ARMSTRONG WILLIAMS"** HSH HAS PRODUCED CULTURALLY RELEVANT SHOWS SUCH AS **"MIGRANT CRISIS"** WHERE **ARMSTRONG** DISCUSSED THE MIGRATION OF THE ISLAMIC PEOPLE INTO AND ACROSS EUROPE AND **"JOBS FOR OUR FUTURE,"** WHERE **ARMSTRONG** DISCUSSED THE CHANGING ECONOMIC LANDSCAPE. HE HAS ALSO PRODUCED AND INTERVIEWED HIGH PROFILE GUEST SUCH AS PRODUCER, **NORMAN LEAR** AND RETIRED PEDIATRIC NEUROSURGEON AND FORMER REPUBLICAN PRESIDENTIAL CANDIDATE **DR. BEN CARSON**. IN **"KING LEAR"** **ARMSTRONG** SAT DOWN AT THE HOME OF THE RENOWNED TELEVISION PRODUCER TO DISCUSS HIS GROUNDBREAKING SITCOMS, SUCH AS **"ALL IN THE FAMILY"**, **"SANFORD AND SON"**, AND **ONE DAY AT A TIME.** **"KING LEAR"** NOT ONLY AIRED ON THE STATIONS OWNED BY **ARMSTRONG**, BUT ALSO AIRED ON ALL SINCLAIR BROADCASTING STATIONS, WHICH REPRESENTS 40% [PERCENT] OF THE TELEVISION MARKET IN THE UNITED STATES AS WELL AS **NEWSMAX TV**, WHICH REACHES 35 MILLION CABLE SUBSCRIBERS THROUGH **DIRECTV** AND **DISH NETWORK**. KEEPING IN SYNC WITH HIS HIGH-PROFILE GUESTS, **ARMSTRONG** INTERVIEWED **CURT SHILLING** AT HIS BOSTON HOME.

ARMSTRONG WILLIAMS HAS EXTENSIVE EXPERIENCE IN TELEVISION PROGRAMMING. SINCE 1995, HE HAS PRODUCED WEEKLY TELEVISION SHOWS WHICH ARE NATIONALLY SYNDICATED AND AIR INTERNATIONALLY. HE HAS BEEN A FREQUENT GUEST ON SHOWS AND NETWORKS SUCH AS THE TODAY SHOW, GOOD MORNING AMERICA, CHARLIE ROSE, CNN, MSNBC, SKY NEWS, DC TV, TV-ONE WITH ROLAND MARTIN AND THE JOY BEHAR SHOW. MR. WILLIAMS HAS PRODUCED PRIME-TIME SPECIALS WITH US SUPREME COURT JUSTICE, CLARENCE THOMAS; POET, MAYA ANGELOU; FORMER VICE-PRESIDENT, DICK CHENEY; AND THE PRIME MINISTER OF ISRAEL, BENJAMIN NETANYAHU.

ARMSTRONG WILLIAMS SERVES AS DR. BENJAMIN CARSON'S BUSINESS MANAGER; EXECUTIVE EDITOR OF CURRENTSEE MAGAZINE IN PARTNERSHIP WITH THE WASHINGTON TIMES NEWSPAPER AND HOSTS THE ARMSTRONG WILLIAMS SHOW DAILY FROM 6:00 TO 8:00 P.M. ON SIRIUS XM SATELLITE RADIO 126 URBAN VIEW.

ARMSTRONG WILLIAMS HAS SERVED ON SEVERAL BOARDS SUCH AS THE PRESIDENT'S COMMISSION ON WHITE HOUSE FELLOWS, NEWSMAX ADVISORY BOARD, INDEPENDENCE FEDERAL S&L BANK BOARD OF DIRECTORS, AND PRESENTLY SERVES ON THE CARSON SCHOLARSHIP FUND.



TELEVISION & RADIO PLATFORMS

THE RIGHT SIDE WITH ARMSTRONG WILLIAMS IS A TAPED TELEVISION PROGRAM THAT AIRS WEEKLY ON 171 STATIONS ACROSS THE U.S AND AIRS IN 22 CARIBBEAN TERRITORIES ON CARIBVISION. THE RIGHT SIDE FORUM WITH ARMSTRONG WILLIAMS IS A LIVE TELEVISION SHOW, AIRING EVERY SATURDAY ON NEWSCHANNEL 8, IN WASHINGTON DC, VIRGINIA, AND MARYLAND AT 10:30 A.M. EST AND IS ALSO STREAMED LIVE ON WWW.WJLA.COM. THE RIGHT SIDE FORUM ALSO AIRS ON NEWSMAX, WHICH REACHES 35 MILLION CABLE SUBSCRIBERS THROUGH DIRECTV AND DISH NETWORK.

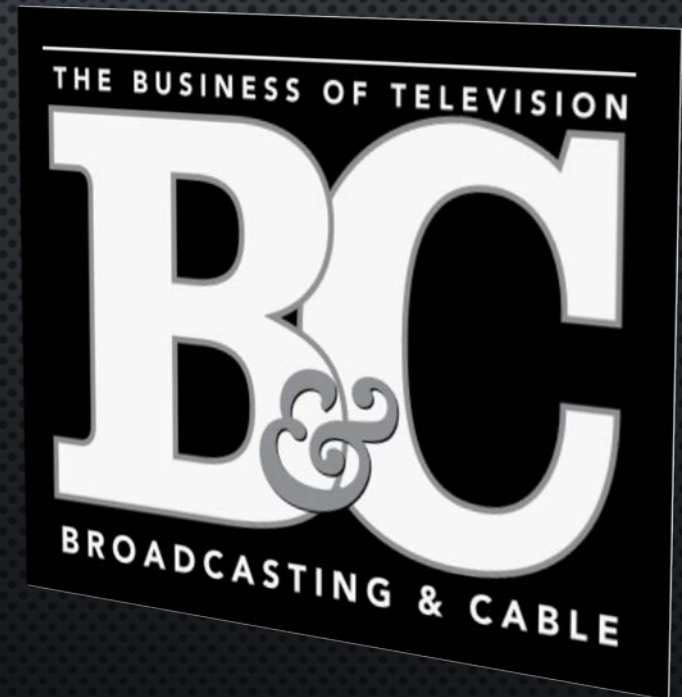
ARMSTRONG HAS A NIGHTLY RADIO SHOW ON SIRIUSXM THAT AIRS MONDAY THROUGH FRIDAY FROM 6:00 PM TO 8:00 PM ON SIRIUSXM URBAN VIEW CHANNEL 126, WHERE HIS MESSAGE CAN BE HEARD BY MORE THAN SIRIUS' 32 MILLION WEEKLY LISTENERS.

ARMSTRONG WILLIAMS HAS OVER TWO DECADES OF EXPERIENCE IN A WIDE RANGE OF POSITIONS FOR THE BROADCAST INDUSTRY. MR. WILLIAMS SERVED AS THE CHIEF OPERATING OFFICER OF RENAISSANCE TV CABLE NETWORK, FROM JANUARY 2001 TO JANUARY 2003, WHERE HE MANAGED STAFF, PROGRAMMING, ADVERTISING AND DEVELOPED PRIME-TIME SPECIALS.

TOWN HALLS

OUR TOWN HALLS ARE CENTERED AROUND
GROUNDBREAKING ISSUES AND HAVE THE POWER TO
GET TO THE HEART OF ANY ISSUE BRINGING
JOURNALISTIC VIRTUE AND SUBSTANTIVE DIALOG TO
TELEVISION.

OUR TOWN HALLS HAVE
BEEN RECOGNIZED IN
MAGAZINES:



RADIO



- THE ARMSTRONG WILLIAMS RADIO SHOW, AIRS MONDAY THROUGH FRIDAY FROM 6PM TO 8PM ON SIRIUSXM URBAN VIEW 126. THE SHOW ALSO REPEATS M-F 4AM TO 6AM, SATURDAY'S AT 6AM TO 8AM AND 4PM TO 6PM.
- MORE THAN **35 MILLION TOTAL ADULT SUBSCRIPTION LISTENERS** TUNE IN (32 MILLION ARE WEEKLY LISTENERS). THE RIGHT SIDE RADIO PROGRAM IS THE MOST CALLED SHOW ON SIRIUSXM URBAN VIEW.

THE ARMSTRONG WILLIAMS SHOW IS ONE OF THE MOST CALLED IN SHOWS ON SIRIUSXM URBAN VIEW...

ABOUT: OUR LOCAL AND NATIONAL SHOWS

THE RIGHT SIDE FORUM



THE RIGHT SIDE FORUM WITH ARMSTRONG WILLIAMS IS A LIVE TELEVISION SHOW, AIRING EVERY SATURDAY ON NEWSCHANNEL 8, IN WASHINGTON DC, VIRGINIA, AND MARYLAND AT 10:30 A.M. EST REPEATS AT 6:30 P.M.

ALSO, STREAMS LIVE ON WWW.WJLA.COM

THE RIGHT SIDE WITH AW



THE RIGHT SIDE WITH ARMSTRONG WILLIAMS IS A TAPED TELEVISION PROGRAM THAT FOCUSES ON NATIONAL AND INTERNATIONAL EVENTS, DIVING INTO ROBUST CIRCUMSTANCES THAT IMPACT THE NATION AND THE WORLD. THE RIGHT SIDE AIRS WEEKLY ON 171 STATIONS ACROSS THE U.S. THIS SHOW ALSO AIRS IN 22 CARIBBEAN TERRITORIES ON CARIBVISION.

OUR BROADCAST STATIONS

- **LAS VEGAS (KVNY)** – HAS A TOTAL POPULATION OF **583,756**. OF THAT POPULATION, **54.9%** ARE MINORITY. IN **2016**, LAS VEGAS HAS AVERAGED **3.5 MILLION VISITORS** PER MONTH AND IN 2015, HAD A TOTAL SUM OF **42,312,216 VISITORS**.
- **CHARLESTON, SC (WGWG)** - HAS A TOTAL POPULATION OF **350,209**. OF THAT POPULATION, **37.3%** ARE MINORITY. THE MEDIAN VALUE OF OWNER-OCCUPIED HOUSING UNITS IS **\$236,900** AND THE OWNER MEDIAN INCOME IS **\$52,083**.
- **MYRTLE BEACH, SC (WMMB)** - HAS A TOTAL POPULATION OF **27,109**. OF THAT POPULATION, **32.8%** ARE MINORITY. WHEN MEASURING THE CIVILIAN LABOR FORCE, THE NUMBERS SHOW THAT **65%** OF WORKERS ARE OVER THE AGE OF **16** WITH **82.3%** OF THE POPULATION OVER THE AGE OF ONE. THESE STATISTICS INDICATE THAT THERE ARE MANY FAMILIES IN THE AREA.
- **BIRMINGHAM, AL (WGWG)** - HAS A TOTAL POPULATION OF **212,237**. OF THAT POPULATION, **79.3%** ARE MINORITIES AND **53.2%** ARE WOMEN.
- **HARRISBURG, PA** - HAS A TOTAL POPULATION OF **49,528**. OF THAT POPULATION, **79.7%** ARE MINORITY AND **78.8%** ARE HIGH SCHOOL GRADUATES OR HIGHER (SOME COLLEGE). THIS CORRELATES TO A FAIRLY EDUCATED VIEWERSHIP. THERE ARE A SIZABLE NUMBER OF WORKING CLASS ADULTS IN THIS MARKET, WITH **62.2%** OF THE CIVILIAN LABOR FORCE ABOVE AGE OF 16.
- **LANCASTER, PA (WXBU)** - HAS A TOTAL POPULATION OF **519,445**. **THIRTY THREE THOUSAND** OF THEM ARE VETERANS. HIGH SCHOOL GRADUATES MAKE UP **84.3%** OF THE POPULATION. THERE ARE OVER **46,000** BUSINESS IN LANCASTER, WITH **25,000** OWNED BY MEN AND **11,000** OWNED BY WOMEN. THE REMAINDER ARE OWNED BY MINORITIES AND VETERANS.
- **FLINT, MI (WEYI)** - HAS A TOTAL POPULATION OF **102,434** OF WHICH MINORITIES MAKE UP **65.4%**. FLINT IS A VERY DIVERSE PLACE. **82.6%** ARE HIGH SCHOOL GRADUATES OR HIGHER.

OUR PROGRAMMING AIRS IN 22:

- BARBADOS
- GRENADA
- ANGUILLA
- ANTIGUA AND BARBUDA
- CAYMAN ISLANDS
- CURACAO
- DOMINICA
- GUYANA
- HAITI
- JAMAICA
- MONTSERRAT
- NEVIS
- ST. KITTS
- ST. LUCIA
- ST. MAARTEN
- ST. MARTIN
- ST. VINCENT & THE GRENADINES
- TRINIDAD
- TOBAGO
- NEW YORK
- NEW JERSEY
- CONNECTICUT



HSRH