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June 01, 2018

Hon. Michelle M. Carey
Chief, Media Bureau
Federal Communications Commission
455 12th St NW
Washington, DC 20554

Re: Comments in Support of TV Station Assignments:

1. KAUT-TV, Oklahoma City, OK (BALCDT20180426ABP); Assignee: HSH OK City (KAUT) Licensee, LLC
 2. KUNS-TV, Bellevue, WA (BALCDT20180426ABR); Assignee: HSH Bellevue (KUNS) Licensee, LLC
 3. KMYU(TV), St. George, Utah (BALCDT20180426ABQ), Assignee: HSH St. George (KMYU) Licensee, LLC
- (Associated With MB Docket No. 17-179, *Applications of Tribune Media Company and Sinclair Broadcast Group, Inc. for Consent to Transfer Control of Licenses and Authorizations* (FCC File No. BTCCDT-20170626AGH, et seq.))

Dear Ms. Carey,

I am writing to express support for the three referenced assignment applications. These assignments are part of the larger divestiture being undertaken by Sinclair Broadcast Group, Inc. ("Sinclair") and its merger of Tribune Media Company ("Tribune"). Each of these assignments will advance minority (African American) broadcast ownership, enhance diversity, and uniquely serve the public interest. All of the assignee entities are owned by Howard Stirk Holdings, LLC, which is wholly owned by Mr. Armstrong Williams, a prominent American broadcaster and

multifaceted entrepreneur.¹

The Sinclair-Tribune merger has created this meaningful and important opportunity to increase minority ownership, as represented in these assignment applications. The Commission has acknowledged the need to enhance minority ownership for forty years. *See e.g., Statement of Policy on Minority Ownership of Broadcast Facilities, Public Notice*, 68 FCC 2d 979 (1978). Congress also has recognized the poor state of minority ownership. The Telecommunications Act of 1996 contains language aimed at increasing female and minority ownership of broadcast licenses and other important communications mediums. 47 U.S.C. § 257, § 309(j). The Act requires the Commission to limit and remove “market entry barriers for entrepreneurs and other small businesses” and to do so by “favoring diversity of media voices.”² These assignments presents the opportunity to advance these important public interest goals and further genuine progress in advancing minority ownership. These assignment applications should be expeditiously granted by the Commission.

As Mr. William’s explained in these assignment applications, based on his station experiences in Saginaw (Flint) and Florence (Myrtle Beach), for example, he noted the following samples of the types of public interest actions and service he previously advanced, and proposes similar undertakings here as well:

1. increase the public affairs and local programming on the stations

¹ Mr. Williams has a long and distinguished career in the broadcast business, including having extensive production, program development and on-air experience. He began his radio career in 1991 at WOL Radio in Washington, DC and has had a nationally syndicated radio and TV show since 1995. Mr. Williams is also a syndicated columnist, does national commentary, is the author of three books, including his top selling “Reawakening Virtues” (New Chapter Publishing, 2011) and hosts a weekly nationally syndicated television show entitled “The Armstrong Williams Show.” He is also the founder of the Graham Williams Group, a public relations firm in Washington, DC, and of Rightside Productions LLC, which provides website content. Mr. Williams’ Howard Stirk Holdings, LLC and Howard Stirk Holdings II, LLC sole member companies hold the following licenses: WEYI-TV, Saginaw, MI; WWMB-TV, Florence, SC; WXBU(TV), Lancaster, PA; WSES(TV), Tuscaloosa, AL; WGWW(TV), Anniston, AL; KHSV(TV), Las Vegas, NV; and WGWG(TV), Charleston, SC.

² While Section 257 is contained within Title II of the Communications Act and thus does not directly encompass broadcast services, the Commission has interpreted some aspects of the language of §257 to apply to broadcast licensing. In 1998, the Commission stated: “While telecommunications and information services are not defined by the 1996 Act to encompass broadcasting, Section 257(b) directs the Commission to ‘promote the policies and purposes of this Act favoring diversity of media voices’ in carrying out its responsibilities under Section 257 and, in its Policy Statement implementing Section 257, the Commission discussed market entry barriers in the mass media services.” *See* FCC 98-281, *Report and Order: In the Matter of 1998 Biennial Regulatory Review -- Streamlining of Mass Media Applications Rules, and Processes -- Policies and Rules Regarding Minority and Female Ownership of Mass Media Facilities*, MM Docket No. 98-43, November 25, 1998.

2. increase the coverage of local events, people and leaders through guests on local public affairs and informational programs
3. produce and air public affairs and informational shows hosted by Mr. Williams and covering current issues such as: Black Lives Matter, Right to Work, Small Business & Economic Development, Reducing Crime, etc.
4. hold and host town hall meetings that will be televised in prime time, to be hosted by Mr. Williams. These town halls will cover topics of local interest (previous town hall meetings Mr. Williams has hosted include: health care, domestic violence, and gun violence)
5. seek to obtain programs of particular interest and enjoyment to minority communities, such as *The Steve Harvey Show* and *Queen Latifah*.
6. advance minority employment and provide an internship program specifically targeted at minority students interested in the technical side of the television business.

Mr. Williams' licensee companies also employ a diverse and multiracial workforce. In fact, over fifty percent of those employees are minorities. These include entry-level positions and upper-level management positions. Minorities are employed as station general managers, directors of operations and creative directors. Approval of these assignment applications would create additional employment opportunity for minorities, promote the public interest by advancing the Commission's interest of diversifying the voices provided by over-the-air-free-to-the-home broadcasting, and advances minority ownership.

For all of the above reasons, and for the reasons noted in the assignment applications, the undersigned respectfully requests that the Commission grant these proposed assignments. Approval will advance minority (African American) broadcast ownership, enhance diversity, uniquely serve the public, and allow greater competition and broadcast service in the public interest.

Respectfully submitted,



cc: Michelle M. Carey, Chief, Media Bureau (Michelle.Carey@fcc.gov)
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