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July 24, 2017

Via Electronic Communication

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

Re: In the matter of 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 my support for the referenced merger of Tribune Media Company (“Tribune”) and Sinclair Broadcast Group, Inc. (“Sinclair”). The merger involves a transfer of ownership control pursuant to which Sinclair will acquire all of the outstanding shares of Tribune and resulting in Tribune’s 33 license subsidiaries becoming indirect subsidiaries of Sinclair.

The proposed merger will allow for significant operational efficiencies and capabilities of the combined companies and allow an enhanced service in the public interest. Sinclair has committed to upgrade the facilities of the stations involved, expand local coverage (including local news), offer greater value to multi-channel video distributors carrying each local stations content, and increase syndicated and original programming offerings.

Sinclair has a unique and accomplished record of working with and assisting minority and under-represented communities in gaining a voice in the marketplace. For example, as the Commission’s files reflect,¹ Sinclair has provided vital assistance to the largest African-American owner of

¹ See, e.g., FCC File No. BALCDT-20130809ADG, granted November 18, 2013, and March 7, 2013 *Notice of Ex Parte* filing in MB Docket No. 09-182 (2010 Quadrennial Review of Ownership Regulations) and MB Docket No. 07-294 (Promoting Diversification of Ownership in the Broadcasting Services).

television stations in the country, Howard Stirk Holdings, LLC, owned by Armstrong Williams.² Without such assistance, minority broadcasters face the virtually insurmountable obstacle of obtaining access to capital and financing. When group owners like Sinclair provide such assistance they give substance to the Commission's decades old aspiration of enhancing minority ownership and increasing program diversity.³

In addition, television stations today face ever-increasing operating expenses, especially costs associated with program acquisition, and constantly growing competition from other mass media, including cable, satellite, and the Internet. These pressures present a very real threat to the future of local television stations, and their ability to provide high-quality, free-to-the-home programming in service of the public interest and their communities of license. The merger will help combat that threat by providing operational efficiencies and economies of scale, as well as greater audience reach allowing Sinclair to attract top-quality programmers, including networks and syndicators, which in turn will improve revenue that can be reinvested in overall broadcast operations in a manner that improves service to the public generally and local markets. Taken as a whole, the proposed merger will enhance the combined company's ability to compete in the video programming, advertising, and distribution marketplaces and help secure the future of *free* television and its unique service to the public.

Sinclair has also been perhaps *the* industry leader in helping develop and bring to the market the ATSC 3.0 transmission standard. Sinclair's investment in the ATSC 3.0 standard represents an enormous opportunity for the television industry to better compete in the media marketplace and develop strategic complements to current broadcast operations, including opportunities to expand digital content offerings and present competition to wireless and digital platforms and services for mobile devices.

Sinclair has also committed to expand a number of public service initiatives to the new markets currently served by just the Tribune stations. As noted in the transfer of control applications, these include (*see*, BTCCDT-20170626AGH, Comprehensive Exhibit, pp. 3-4):

“• *Connect to Congress*: Over the past two years, Sinclair has invested heavily in a

² Armstrong Williams is a prominent African-American broadcaster and entrepreneur. He has a long and distinguished career in the broadcast business, including having extensive production and on-air experience. He began his radio career in 1991 at WOL Radio in Washington, DC and has had a nationally syndicated radio 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 Armstrong Williams Productions LLC, which provides website content.

³ *See*, 2010 *Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996 et al.*, 27 FCC Rcd 13814, at ¶ 9 (2012).

robust Washington, D.C. bureau in order to give its local stations unprecedented direct access to news coming from Capitol Hill, and new voices on national issues in addition to networks' national newscasts. One of the many benefits of this investment is *Connect to Congress* a program which provides local anchors with the opportunity to interview their lawmakers remotely when lawmakers are in Washington. This initiative has received bipartisan recognition for being the best way for lawmakers to stay in touch with their constituents when Congress is in session.

“• *Sinclair Cares: Sinclair Cares* is a monthly program focused on maintaining the health and well-being of our viewers. The program centers on a different cause each month, providing topical information aimed at increasing awareness and prevention of numerous health risks. Topics range from toxic food to breast cancer awareness.

“• *Community Outreach: Sinclair's stations constantly work together regionally to leverage their strength to the community's benefit. In San Antonio, for example, KABB FOX29, WOAI News 4 San Antonio and KMYS CW35, worked together with St. Jude's Children Research Hospital to raise funds for their Dream Home Giveaway. The stations were recently honored with the St. Jude's Dream Home Station of the Year Award for their efforts to help raise \$1.8 million in two years for the children of St. Jude. Sinclair would seek to grow efforts like these by extending them to Tribune's stations.*”

For all of the above reasons, and for the reasons noted in their transfer of control applications, the undersigned respectfully requests the Commission grant the proposed merger of Sinclair and Tribune. Grant will allow greater competition and broadcast service in the public interest.

Respectfully submitted,

A handwritten signature in black ink that reads "Harold Doley". The signature is written in a cursive, flowing style.

cc: David Brown, Video Division, Media Bureau, via email: David.Brown@fcc.gov
David Roberts, Video Division, Media Bureau, via email: David.Roberts@fcc.gov