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August 3, 2000

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Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

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RE: The Dual Network Rule, MM Docket No. 00-108

Dear Madame Secretary:

I am writing on behalf of Holston Valley Broadcasting Corporation as licensee of television station WAPK-LP (soon to be WAPK-CA we hope) to support elimination of the rule, which currently prohibits one of the "Big 4" broadcast television networks from also owning one of the two smaller "weblets" (UPN or the WB Network) or other similar small networks.

WAPK-LP (WAPK) signed on in 1991 and has been an affiliate of the UPN Network since UPN came into existence. It is public knowledge that UPN has struggled financially from its inception; yet both UPN and its affiliates have persevered. Although this "netlet" is still unprofitable, there is "light at the end of the tunnel" assuming its merger with the owner of the large CBS Television Network is allowed by the Commission.

WAPK's viability has been greatly enhanced by its affiliation with UPN. Prior to UPN's inception we learned "the hard way" just how difficult it can be to reach viability and secure cable carriage for a "low power" TV station. Its affiliation with UPN has given WAPK a "brand" it can sell both to advertisers and to cable systems and has had a large role in securing WAPK a channel slot on some twenty-five area cable systems despite the fact that as an LPTV station WAPK has no "must carry" privileges. Having the UPN brand or label makes the station recognizable and helps to popularize all of its programming ---- UPN programs, syndicated offerings, and local originations alike.

Not only has UPN provided WAPK with ten hours each week (soon to be expanded) of quality prime time product, it has made it possible for WAPK to more easily meet its FCC-friendly children's programming responsibilities ---- even more important as we apply for primary Class A status later this year.

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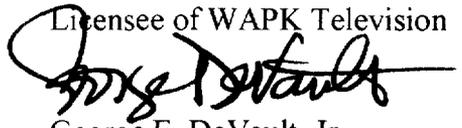
Allowing UPN to be co-owned with a strong network partner like CBS does not stifle programming diversity, but does instead assure programming diversity by assuring UPN's survival and thus the survival and proliferation of UPN affiliates in local television markets large and small. Dozens of markets have an additional local free over-the-air television station thanks to the presence of UPN.

UPN aims its offerings at a demographic largely different from that targeted by any other free broadcast network and has placed its public affairs emphasis on that same demographic audience with the UPN series "The Teen Files." These periodic specials speak to the nation's youth on such subjects as sex, smoking, and the use of alcohol. They complement WAPK's own local weekly public affairs program and our daily local news programming.

Please assure the continued presence of UPN and the diversity it offers the viewers of America by eliminating the so-called Dual Network Prohibition Rule.

Sincerely,

HOLSTON VALLEY BROADCASTING CORPORATION  
Licensee of WAPK Television

  
George E. DeVault, Jr.  
President

Copies to:

The Honorable William E. Kennard  
Chairman  
Suite B201

The Honorable Michael Powell  
Commissioner  
Suite 8A204

The Honorable Harold Furchtgott-Roth  
Commissioner  
Suite 8A302

The Honorable Susan Ness  
Commissioner  
Suite 8B115

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The Honorable Gloria Tristani  
Commissioner  
Suite 8C302

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