

WNGS-TV
9279 Dutch Hill Road
West Valley, NY 14171

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August 9, 2000

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

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

Dear Ms. Salas:

I am the licensee of WNGS-TV, the UPN affiliate in the Buffalo, NY market. My husband and I operate WNGS with a very limited staff. WNGS began broadcasting in late 1996 as an independent station. Most of our early programming consisted of old TV series like Dobie Gillis and Ozzie & Harriet and public domain movies. Cable systems, advertisers, and viewers were lukewarm to our early programming offerings.

There are nine commercially licensed stations in the Buffalo market. All networks except for UPN had primary affiliates in Buffalo when WNGS began operations in 1996. The large number of stations in the market has also made it extremely difficult to get high-quality, syndicated, first-run programming to air on WNGS. It is invaluable to WNGS to have UPN's ten hours of quality programming to air during prime time. Before becoming the Buffalo UPN affiliate in April 1998, limited programming resources forced WNGS to air public domain movies in daytime and prime time hours. Being a UPN affiliate has allowed WNGS to provide exciting, recognizable programming to our viewers and advertisers.

Not only has the UPN affiliation allowed WNGS to improve the quality of the programming it offers viewers, but it has allowed WNGS to become a viable station financially. The UPN affiliation has helped us to increase public awareness in a number of ways. First, our carriage on local cable systems has gone up 25% since we began airing UPN programming in 1998. In addition, UPN supports WNGS's promotion in other mediums such as billboards, print, and radio. This increased exposure has brought more viewers and advertisers to WNGS.

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WNGS has doubled its revenue each year since becoming a UPN affiliate. This increased revenue has allowed us to improve our programming in other dayparts. WNGS would not have been able to accomplish these things without the programming and financial support of UPN. WNGS is a locally owned and operated station that would not be able to survive in a very crowded marketplace without the UPN affiliation. I support the elimination of the dual network rule with respect to the ownership of weblets. I believe that Viacom's continued ownership of UPN will ensure UPN's and WNGS's financial viability.

Sincerely,



Caroline K. Powley

cc: Chairman William Kennard
Commissioner Susan Ness
Commissioner Harold Furchtgott-Roth
Commissioner Michael Powell
Commissioner Gloria Tristani