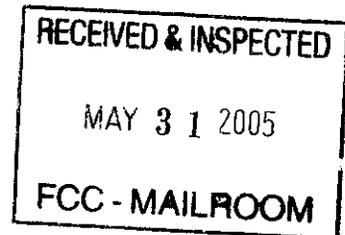


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ORIGINAL

May 27, 2005

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE, Suite 110
Washington, D.C. 20554RE: Notice of Oral *Ex Parte* Presentation - MB Docket No. 04-75

Dear Ms. Dortch:

On May 16, 2005, Messrs. Ralph Toddre, President of Sunbelt Communications Company ("Sunbelt"), Jonathan Lichstein, corporate communications counsel for Sunbelt, and the undersigned communications counsel to Sunbelt, met with Jordan Goldstein, senior legal advisor to Commissioner Michael J. Copps; with Commissioner Kathleen Abernathy and her staff; and with Catherine Bohigian, legal advisor to Commissioner Kevin J. Martin. Sunbelt's representatives met again on May 17, 2005 with Commissioner Jonathan Adelstein and his staff.

The purpose of the visits was to request steps be taken by Commissioners' offices to request the Media Bureau to complete its review and issue a decision on a Petition for Reconsideration involving a settlement agreement entered into between Meridian Communications of Idaho, Inc. ("Meridian") and Flat Iron Ranches, Inc. ("Flat Iron"). The parties were competing applicants for a construction permit for a new television station on Channel 20, Idaho Falls, Idaho (*see* BPCT-19950512KG and BPCT-19950306KF). The settlement agreement was filed with the Commission on August 18, 1999 and proposed the withdrawal of Flat Iron's application and the grant of Meridian's application. Petitions challenging the settlement were filed by The Post Company ("The Post"), licensee of Station KIFI-TV, Idaho Falls, Idaho and Fisher Broadcasting Company, Inc. ("Fisher"), the licensee of Station KIDK-TV, Idaho Falls, Idaho.

The issues raised therein related back to challenges first raised in 1995 when The Post filed a petition to deny Meridian's applications. The Commission's staff issued a decision on July 23, 2003 approving the Settlement Agreement and granting the application of Meridian. The Post filed petitions for reconsideration on September 4, 2003, and an opposition was filed by Meridian on September 15, 2003. Since that time the matter has remained pending before the Commission's staff without any further action.

Given the length of time in which these issues have been pending before the Commission, Sunbelt submitted its position to the Commission's offices that a matter which has languished before the Commission's staff for some ten years warrants immediate resolution. Accordingly, Sunbelt urged the Commissioner's offices to direct its staff to act on the petition for reconsideration and the related pleadings.

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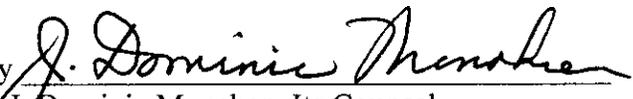
Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
May 27, 2005
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During the course of the above visits the Commissioners' staff initiated inquiry as to Sunbelt's position on the request of Max Media of Montana, LLC's ("Max Media") for an expedited declaratory ruling filed February 25, 2004 and the supporting comments filed by Destiny Licenses, LLC ("Destiny") on March 21, 2005. Essentially Max Media and Destiny have claimed that NBC has chosen to allow its network affiliation with Station KTGF(TV) (Channel 16), Great Falls, Montana to expire at the end of its term on July 1, 2005, in order that the Great Falls market could be served by Sunbelt's Station KTVH(TV) in Helena, Montana. Max Media (which sold Station KTGF(TV) to Destiny in November of 2004) and Destiny claim that this would violate the territorial exclusivity limits of §73.658(b) of the Commission's rules. Their argument is that this alleged arrangement prevents KTGF(TV) from providing the NBC signal to the Great Falls market by a station licensed to that community. Sunbelt addressed this argument noting that Sunbelt (through its wholly owned subsidiary, Beartooth Communications) had acquired Station KBGF-LP (Channel 50) which is allocated to Great Falls and proposes to broadcast local news programming and the NBC signal from that facility.

Pursuant to §1.1206(b) of the Commission's rules, an original and one copy of this letter are being submitted to the Secretary's office with copies to Jordan Goldstein, Commissioner Kathleen Abernathy, Catherine Bohigian, and Commissioner Jonathan Adelstein. In addition, copies are being provided to Julian Shepard, counsel to Max Media, Erwin Krasnow, counsel to Destiny Licenses, LLC and Kathryn Smeltzer, counsel to The Post Company, Inc. and Fisher Broadcasting.

Respectfully submitted,

SUNBELT COMMUNICATIONS COMPANY

By 
J. Dominic Monahan, Its Counsel

JDM/nlk

cc:

cc: Jordan Goldstein, Esquire, FCC
Commissioner Kathleen Abernathy
Catherine Bohigian, FCC
Commissioner Jonathan Adelstein
Julian Shepard, counsel to Max Media
Erwin Krasnow, counsel to Destiny Licenses, LLC
Kathryn Schmeltzer, counsel to The Post Company, Inc. and Fisher Broadcasting
Ralph Toddre, Sunbelt Communications Company
Jonathan Lichstein, Esquire