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Summary

Fisher stations have a long history of community service. The stations serve their communities in many ways, including local newscasts, local programming, local public service announcements, responsiveness to community needs and concerns and involvement in community affairs.

Localism is a cornerstone of Fisher's broadcast mission, but Fisher respectfully opposes the Commission's adoption of "re-regulatory" measures relating to community ascertainment, advisory boards, the main studio rule, and unattended operation. These proposals are simply unnecessary, overly burdensome, and may have the unintended consequence of restricting the way broadcasters currently exercise their discretion and judgment in identifying and responding to the needs and interests of their local communities. In this regard, the Commission's proposals will not increase stations' community involvement, but will force an undue amount of record keeping that will result in no discernable increase of benefit to the community.

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Broadcast Localism) MB Docket No. 04-233
)

To: The Commission

COMMENTS OF FISHER COMMUNICATIONS, INC.

Fisher Communications, Inc. (“Fisher”) hereby submits these comments in response to the *Report on Broadcast Localism and Notice of Proposed Rulemaking (“Notice”)*¹ in the above-captioned proceeding. Fisher Communications, Inc. is a Seattle-based communications company that owns or manages thirteen full power, eight low power television stations and eight radio stations in the Western portion of the United States.² The company also owns and operates Fisher Pathways, a satellite and fiber transmission provider; Fisher Plaza, a media, telecommunications, and data center facility located near downtown Seattle; and Pegasus News, an online start-up and hyper-local media pioneer based in Dallas, Texas.

¹ *Broadcast Localism, Report on Broadcast Localism and Notice of Proposed Rulemaking*, 23 FCC Rcd 1324 (2008) (“Notice”).

² Fisher owns, directly or indirectly, the following full and low power television stations: KOMO(TV), KUNS(TV), KATU(TV), KUNP(TV), KUNP(LP), KBCI(TV), KUNB(LP), KVAL(TV), KCBY(TV), KPIC(TV), KIMA(TV), KKFQ-CA, KWWA-CA, KEPR(TV), KORX-CA, KVVK-CA, KIDK(TV), KPPP LP, KLEW(TV), KBAK-TV and KBFX-CA.

I. BACKGROUND

The Commission's *Notice* focuses on "broadcaster efforts to provide community-responsive programming such as news and public affairs, and programming targeted to the particular needs or interests of certain segments of the public." *Notice*, ¶ 2. The Commission has concluded that modification of some of its "rules, policies and practices may be necessary to address the deficiencies of many broadcasters in meeting their obligations to serve their local communities." *Notice*, ¶ 3.

Fisher stations have a long history of community service and recognize it as a cornerstone of the strong relationship that it has with its communities. The stations serve their communities in many ways, including local newscasts, local programming, local public service announcements, responsiveness to community needs and concerns and involvement in community affairs. Fisher respectfully submits these Comments in response to the Commission's *Notice* to demonstrate many of the ways in which Fisher owned and managed broadcast stations currently serve their local communities and to oppose the Commission's adoption of exclusively intrusive program regulatory measures relating to community ascertainment, advisory boards, the main studio rule, and unattended operation. Fisher believes that these proposals are simply unnecessary, overly burdensome, and may have the unintended consequence of restricting the way broadcasters currently exercise their discretion and judgment in identifying and responding to the needs and interests of their local communities. In this regard, the Commission's proposals will not increase stations' community involvement—

Commission experience has shown that to be the case with respect to similar measures of this kind that the Commission imposed and later rescinded. Rather, these measures, if adopted, will simply serve to force an undue and expensive record keeping regulatory burden on stations that will result in no discernable increase in public interest programming benefits to the community. Simply stated, the costs of the Commission's proposals outweigh any potential public interest benefit to be derived therefrom.

II.
FISHER STATIONS CURRENTLY PROVIDE
EXTENSIVE SERVICE TO LOCAL COMMUNITIES

Underlying the Commission's *Notice* is its apparent skepticism whether broadcasters currently are providing adequate service addressing local needs and concerns. Fisher recognizes and agrees that "localism," which entails communication and interaction with local communities and responsiveness to local issues, is fundamental to a broadcaster's obligation to serve the public interest and to the operation and success of broadcast stations. Indeed, Fisher has a legacy of serving the community and setting the standard for innovation and journalistic excellence, and its express corporate mission is to:

make life better in the communities served by connecting and empowering people through local news and information. Fisher expects each of their employees to contribute his or her best efforts and energies with high integrity in serving the Company's viewers, listeners, advertisers and communities.

See, e.g., <http://www.fsci.com/howeare.html>.

This local focus manifests in many ways. In an effort to determine the efforts by Fisher's full-power television stations, a "localism" survey was submitted to the stations. From that survey, outlined below are just some of the ways Fisher stations fulfill their obligation to the communities they serve.

Local Newscasts

Fisher's stations air local newscasts Monday through Friday in the early morning hours, usually between 5 AM and 7 AM, prior to their network's morning show. These include local overnight stories, weather, traffic, and sports. In instances where severe weather storms have occurred, school closures and other pertinent information are included. Several Fisher stations air a local newscast during the noon hour. All of the stations air local newscasts in the late afternoon or early evening hours and following their network's prime time programming. Again, these include local news stories, weather, sports, and traffic. Anywhere from 50% to 90% of the stories covered in these newscasts cover local issues.

Weekend newscasts air Saturday and Sunday on a regular basis, both early in the morning, in the early evening hours and following network prime time programming. The same content criterion applies as above.

Local & Public Affairs Programming

Several of Fisher's stations air a regular week day local program. These include in the case of KOMO(TV), Seattle, "*Northwest Afternoon*," (on the air for nearly 24 years) and KATU(TV), Portland, "*AM Northwest*" (on the air for 33 years). These shows include local topics of concern, whether it is health issues, child welfare, schools, women's issues, etc. KBAK(TV), Bakersfield, includes a public affairs interview

segment within its weekday Noon newscasts that cover various issues, including issues that affect women, minorities and youth, health & safety concerns and local fund raising events. KVAL(TV), Eugene, conducts interviews in its weekday Noon newscasts that promote local non-profit community partners, interviewing local agencies prior to their fundraising events, as well as addressing topical community issues. KVAL(TV) also produces a local weekly sports program that highlights activities within the PAC 10 Conference, including on-set interviews with local athletic sports experts with emphasis on the University of Oregon and Oregon State University. The station also produces and airs a weekly 15 minute sports segment once a week during an 11 PM newscast that features the activities of the local high school sports programs. KLEW(TV), Portland, produces and airs a weekly local sports show “*The Sports Buzz*,” that covers sports and local student athletes and coaches. KLEW(TV) also airs two weekly features “Academic All Stars” and “*Prep Athlete of the Week*.” that feature outstanding students and student athletes. KIDK(TV), Idaho Falls, produces and airs “*Eye on Idaho*,” a weekly public affairs program that addresses issues of public interest.

Many of Fisher’s stations aired documentaries over the past year, including KATU which aired four programs concerning ecology, raising healthy, happy children and giving back to the community. KOMO(TV), Seattle, aired an hour long documentary on Seattle’s Children’s Hospital and a For Kids’ Sake Special, focusing on innovative local educators who are creating a passion for learning in children. This was part of the station’s on-going “*For Kids’ Sake Campaign*” that is going into its 22nd year. KIMA(TV), Yakima, aired documentaries concerning downtown Yakima’s revitalization and economic rebound, challenges facing Hispanic youth in the Yakima Valley, the impact of dams on the Yakima Nation tribe, the economic impact of the Yakima/Tri-

Cities wine industry and overlooked manufacturing businesses in the Yakima Valley and the role they play in the Yakima Valley economy. KVAL(TV), Eugene, aired two documentaries on drug abuse. KBCI(TV), Boise, aired four documentaries concerning the environment.

Political Programming

KOMO(TV), Seattle, provided extensive coverage of the local issues leading up to the 2007 primary and general elections. While the State pushed up the Primary a month to give voters and candidates more time between the Primary and the November Elections, KOMO 4 News provided its viewers with the background they needed to make informed decisions on the candidates and issues. Voters were called upon to decide issues relating to insurance reform and funding for education and transportation. KOMO 4 News called for eligible voters to get out and register so that they could be involved in the decision making process. In its coverage of the 2008 Presidential race, KOMO 4 News has covered local visits from candidates, including a one-on-one interview with Hillary Clinton. As local voters prepared to cast their votes for candidates, KOMO 4 News filed numerous reports to help clarify Washington State's dual caucus and primary systems.

KVAL(TV), Eugene, will air an hour-long Oregon Democratic U.S. Senatorial debate on May 4, 2008.

KIMA(TV), Yakima, aired debates in 2007 between Republic U.S. Senatorial candidates and candidates for the Yakima City Council.

KLEW(TV), Lewiston, offers free, on-air candidate profiles for selected political races during political seasons.

Special Programming Events

Fisher stations air special programming throughout the year that highlight community activities. These include telethons, food drives and other activities in the communities the stations serve. Examples of some of these efforts are outlined below.

KOMO(TV), Seattle

Season of Giving

The 2007 Season of Giving took on a special significance as it was scheduled the same week that the devastating floods hit Southwest Washington. KOMO(TV) turned this year's food drive into Flood Relief, Part II with the majority of the 49,085 donated pounds designated for flood ravaged areas served by Food Lifeline. In addition to the tonnage, \$71,600 in cash was also donated (equaling some 396,000 meals).

Miracle Season Results – December 16

This December one-hour treat followed the Season of Giving Food & Toy Drive by one week this year and raised \$160,000.

December Flood Relief

KOMO 4 News pushed the “go” button to hold a Flood Relief Drive a mere one day before the drive occurred on December 5. The floods in Southwest Washington became the lead story as zip code after zip code was devastated by the flood waters that just would not stop. The response from the Station's viewers was overwhelming. Within a 17 hour period, from 6am to 11pm, the Station's viewers brought in enough cleaning supplies, tools, small household appliances, shoes, clothing, et cetera to fill 7 semi-trucks

and donated \$60,000 cash and another \$5,000 in gift cards. The money and goods were distributed by the Salvation Army.

The Station decided to air a special which aired a week later (December 11) and that program generated \$46,000.

Oscar Night America – Academy Awards Benefit Party

Starlight/Starbright Foundation benefited with donations of \$69,300.

Miracle Network Telethon - June 2nd

Held June 2nd in KOMO(TV) Studios, the telethon was hosted by four of the station's anchors and one of its popular commentators. The broadcast raised \$192,000.

YWCA Professional Women's Luncheon

KOMO 4 News anchor/reporter Kathi Goertzen hosts and emcees (and KOMO 4 supports) this annual event designed to raise a significant percentage of the YWCA's annual budget. Patrons donated \$811,814 at the luncheon.

Champions on Ice

Show producers donated \$2500 to the charity of the Station's choice – Food Lifeline

Warren Moon/Steve Pool Celebrity Golf Gala

A half-a-million dollars was raised for Children's Hospital & Regional Medical Center's Uncompensated Care Fund at the golf tournament hosted by former NFL football player Warren Moon and KOMO(TV)'s meteorologist, Steve Pool.

Y-Me Walk

KOMO 4 sponsored a relatively new walk to raise funds for Breast Cancer research that occurs on Mothers' Day. The fledging organization, the "Y-Me Breast Cancer Organization" raised \$125,000. Anchor Denise Whitaker emceed the event.

Vertical Express for MS

KOMO 4 sponsored a relatively new event in February 2007. The Vertical Express for MS is a weekend of winter sporting events which raises money for multiple sclerosis. Weathercaster Jim Castillo was host for this event. Nearly \$50,000 was raised.

KATU, Portland

Oprah's Big Give: Portland Pays it Forward

KATU was chosen as one of the ABC affiliates in the country to be given \$10,000 in seed money to "give big" to our community. The non-profit, Friends of the Children received the donation. Friends of the Children serves vulnerable and at-risk children in Portland. Adult mentors are hired to work with children from the age of kindergarten through high school to give children the adult encouragement and success strategies necessary for a better chance at success. KATU blanketed our airwaves and turned \$10,000 of seed money into \$166,317 in just over one month. KATU produced and aired

Public Service Announcements, promotional announcements, daily News stories, live remote coverage of events, an online auction on katu.com and daily exposure on AM Northwest plus a live AM Northwest remote show broadcast from Friends of the Children.

Big Brothers Big Sisters

KATU headed up a bowling fundraiser for Big Brothers Big Sisters that included stories on AM Northwest, the news, and exposure on katu.com. Public Service Announcements encouraged viewers to attend a series of bowling events throughout February and March to raise money for children who need a mentor and friend.

Family Matters Fundraiser for Flood Victims

KATU responded to the flooding crisis last December by hosting an all day phone bank fundraiser to benefit the Red Cross, generating over \$87,000 for flood victims. KATU News aired stories and live remotes from flood ravaged areas throughout the day as KATU and Red Cross employees manned a hotline that operated from 9 a.m. – 7 p.m. AM Northwest dedicated it's entire show to the Food Relief Hotline to benefit the Red Cross. News also covered the hotline in each show that day, and a crawl urging viewers to call and donate aired throughout daytime programming. Contributions ranged from \$5 to \$5,000 and above, with a huge outpouring of viewer support for the flood victims.

Make-A-Wish Phone Bank

KATU also supported the children of Make-A-Wish with a fundraising phone bank on December 7, 2007 that raised over \$30,000 and 3 million frequent flier airline

miles to grant the wishes of critically ill children. KATU produced and aired Public Service Announcements featured stories on both AM Northwest and the News and offered exposure on katu.com.

Oregon Humane Society Telethon

The station produced a fundraiser for the Oregon Humane Society that included a four hour telethon on October 14, 2007, promotional announcements and appearances on the AM Northwest show prior to the telethon, and news coverage following the telethon. KATU on-air personalities hosted the telethon along with the Executive Director of the Oregon Humane Society and radio personality, Les Sarnoff. The telethon earned \$275,000 from both corporate and private donations, increasing its earnings by \$55,000 over a similar effort on KATU in 2006.

March of Dimes WalkAmerica

In 2007, KATU encouraged viewers to participate in the March of Dimes WalkAmerica, an annual fundraiser to aid in the prevention of premature births. KATU featured March of Dimes in two 5 minute segments on AM Northwest, over 80x public service announcements that aired in the two months prior to the April 28 event. KATU News covered the actual walk on April 28 with live coverage in the morning news. KATU is ramping up for the 2008 March of Dimes March for Babies (new name for the walk) on April 26, 2008. Public Service Announcements, AM Northwest segments, and exposure on the news have been a staple this year as in past years and have helped draw thousands of walkers in the Portland, Vancouver, and Salem viewing areas.

KATU/Family Matters TV Specials

KATU and its Family Matters partners Providence Health & Systems and Rodda Paint believe in serving our community with television programming that addresses family needs. Half-hour specials produced and aired on KATU with encore presentations for each included:

Building Better Kids

KATU has received an Emmy nomination for this special that gives parents practical ideas for bettering the lives of their children; from nutrition and health to education and hobbies.

Caring for Our Aging Parents

This special addressed the challenges of the “sandwich generation” and illustrated the many options and choices that both they and their parents face.

Go Green!

The second annual Family Matters Earth Day special aired April 19th and illustrated companies and individuals who are making a difference in the health of our community and our planet. Practical tips that families can do today were given throughout the broadcast.

Family Matters on the Go!

Monthly AM Northwest segments accompanied by Promotional Announcements and exposure on katu.com provide families with helpful tips on raising children. Topics

range from teaching kids to help with chores to selecting summer camps and activities. The theme of the Family Matters on the Go is family-based and meant to draw busy families closer together.

KLEW(TV), Lewiston

During July 2007, KLEW(TV) partnered with the National Prostate Cancer Coalition to bring a mobile testing unit to Lewiston. Thanks to the station's publicity, over 400 men were screened in a single day.

During the Christmas season, KLEW(TV) gives away \$3,000 worth of toys to community children. Half are sponsored and are given away on-air and the other half the station donates to the "Christmas Connection" for needy children.

The Station has partnered with the local Blood Bank to encourage viewers daily to help replenish desperately needed blood supplies.

KLEW(TV) is a co-sponsor of the Idaho Senior Games, an organization which encourages seniors to be physically active.

The Station donates advertising gift certificates to numerous non-profit organizations each year for use in fund-raising auctions. In addition, KLEW(TV) is a co-sponsor of numerous charity golf tournaments and other fund-raising events.

KLEW(TV) anchors emcee local events, read in the public schools at least once a year, are invited to speak in classes at local schools, including WSU and UI, and are involved in other activities, such as the American Cancer Society Relay For Life. The Station's staff participates in both the U of L Homecoming Parade and the Clarkston Lighted Christmas parade.

KBCI(TV) Boise

This year, KBCI(TV) has already aired many local PSA's and news segments urging the community to donate food to the local food bank and In February the station held an all-day food drive

The Station also collected food and cash donations to benefit the local food bank at a local basketball game in February.

KIDK(TV), Idaho Falls

KIDK(TV) has been involved for over 18 years with the Primary Children's Medical Center in Salt Lake City, Utah. The telethons are conducted in June and have raised over \$500,000.

Additional Programming Efforts

In addition to the programming mentioned above, Fisher's stations also respond when there is a crisis in the communities they serve. If there is a weather catastrophe, raging forest fires, etc. the stations are on the air for many hours at a time, providing information on damaged areas, road closures, where to go for assistance and other pertinent information. Should such an occurrence take place, many times Fisher's stations' newscasts are solely devoted to covering just that particular story or event.

Fisher's stations also air programming aimed at particular community segments, whether it's encouraging the adoption of special needs children and encouraging teens to celebrate smart and sober during promo and grad season, coverage of high school sports activities, or sponsoring and airing an annual Fourth of July fireworks display.

Fisher's stations are committed to producing and airing local PSAs. During a one week period, according to the survey, Fisher's stations aired nearly 1,000 local PSAs. Many of these PSAs were produced by the stations. Fisher's stations also air national PSAs on a regular basis.

* * * * *

The preceding is simply a summary of the many ways in which Fisher stations currently serve their local communities. This local service is truly the "life blood" of Fisher's stations, and it is how broadcast stations are able to differentiate themselves from the myriad other media outlets.

**III.
THE COMMISSION'S RE-REGULATORY
PROPOSALS ARE UNNECESSARY AND,
POTENTIALLY, COUNTERPRODUCTIVE**

The Commission's *Notice* seeks comments on several localism issues and is based on the record developed earlier in this docket in connection with the Commission's 2004 Notice of Inquiry.³ Among other things, the Commission is proposing:

- (1) Requiring stations to convene and consult advisory boards made up of local officials and other leaders to help identify issues for and produce local issue-responsive programming;
- (2) Adopting license renewal processing "guidelines" that require stations to report on the amount of locally-oriented programming they broadcast;
- (3) Modifying the remote station operation rules to require that stations be staffed during all hours of operation;
- (4) Amending the main studio rule to require broadcasters to maintain their main studios in their communities of license;

³ *Broadcast Localism*, Notice of Inquiry, 19 FCC Rcd 12425 (2004).

- (5) Requiring stations to report on their airplay of the music and other performances of local artists.

The *Notice* recites a purported need for regulatory guidance in order to ensure that broadcasters remain accessible and responsive to the needs and interests of their communities, suggesting that “many stations do not engage in the necessary public dialogue as to community needs and interests” and that “the dialogue between broadcasters and their audiences concerning stations’ localism efforts is not ideal.”⁴ These conclusory assertions are not grounded in fact. As discussed above, the operations and experiences of Fisher stations are in stark contrast to the Commission’s speculation.

While the *Notice* repeatedly recites the conclusion that broadcasters’ current efforts to achieve the goal of local and issue-responsive programming fall short,⁵ the *Notice* cites no specific evidence that most—or even many—stations in fact fail to communicate effectively with their communities. The Commission should be extremely hesitant to impose burdensome and restrictive regulation—particularly with respect to regulations it previously has rejected as over-regulatory—if there is no demonstrable problem in need of a cure. In fact, in recent years, when community organizations have challenged broadcasters’ efforts to serve their local communities, the Commission has routinely rejected such claims and found that individual broadcasters were appropriately

⁴ *Notice*, ¶¶ 1-2.

⁵ *Id.*, ¶ 13.

exercising their discretion in serving the public interest.⁶ The record in this proceeding, which expressly acknowledges that many broadcasters are, in fact, making significant efforts to provide programming that addresses community needs and interests, does not suggest that potentially burdensome and intrusive regulation is necessary to avert a crisis in the production of issue-responsive programming.

All of the Commission's proposals in the *Notice* would result in significant operational costs to broadcasters. While certain costs are understandable and unavoidable in a regulated business, the imposition of unnecessary regulatory costs on stations diverts station resources from the very programming the Commission is seeking to promote. Resources devoted to regulatory compliance cannot be devoted to improving the broadcasters' product.

More to the point, market forces, rather than regulation, provide the most effective assurance that broadcasters will remain responsive to the needs and interests of their communities. As stated, localism is the linchpin of Fisher's broadcast operations and serves to differentiate its stations from other media outlets. More than twenty years ago, the Commission recognized that this market driven effect justified elimination of regulatory burdens designed to enhance localism:

[M]arket incentives will ensure the presentation of programming that responds to community needs and provide sufficient incentive for licensees to become and remain aware of the needs and problems of their communities.

⁶ See, e.g., *Entercom Portland License, LLC*, DA 08-495 (2008); *KUFO-FM*, DA 08-387 (2008); *New York AM Radio, LLC*, DA 08-367 (2008); *Infinity Media Corporation*, DA 08-348 (2008); *WGCH(AM)*, DA 08-308 (2008); *Wine Country Broadcasting Company*, 22 FCC Rcd 12894 (2007).

[Deregulation] reflects the importance and viability of market incentives as a means of achieving [the Commission's] regulatory objectives and will provide . . . broadcasters with increased freedom and flexibility in meeting the continuously changing needs of their communities.⁷

Since the Commission arrived at this conclusion some twenty years ago, there has been a veritable explosion in the number and variety of media outlets. It is inconceivable that the Commission could conclude that the market forces have become less powerful and less pervasive since 1984. Moreover, nothing in the *Notice* suggests that broadcasters generally are failing to meet their obligation to provide issue-responsive programming, or that the flexibility to identify and respond to community issues cited as the basis for the Commission's deregulatory efforts in the 1980s has been misused or is no longer producing (or capable of producing) the desired results. Indeed, nothing in the *Notice* provides any reasoned basis for the Commission's sharp turn back toward the regulatory landscape of the early 1980s.

The D.C. Circuit noted, in the appeal of the Commission's *Radio Deregulation Order*, that "abrupt shifts in policy do constitute 'danger signals' that the Commission may be acting inconsistently with its regulatory mandate." *Office of Communication of the United Church of Christ v. FCC*, 707 F.2d 1413, 1425 (D.C. Cir. 1983). That "danger signal" is all the more pressing here, where the Commission has already considered the burdens and benefits of enhanced regulation on such matters as ascertainment and license

⁷ *The Revision of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations*, Report and Order, 98 FCC 2d 1076 (1984) ("*Television Deregulation Order*"), ¶¶ 2-3.

renewal processing guidelines and concluded that ordinary market forces rather than potentially costly and burdensome regulation provided the best assurance that broadcasters will satisfy their mandate to program in the public interest.

Conclusion

It is unquestionable that localism is fundamental to a broadcaster's obligation to serve the public interest. For the foregoing reasons and as confirmed by the public interest program stewardship of its broadcast stations, the Commission's proposed new localism regulatory requirements are unnecessary, overly intrusive and burdensome, and are likely to have the contrary and unintended effect of restricting broadcasters' ability to provide programming that serves the needs and interests of their communities.

Fisher respectfully requests that the Commission consider these Comments and decline to adopt the localism proposals discussed herein.

Respectfully submitted,

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