

DOCKET 98-120

syncommedia@msn.com wrote on 10/9/2008 11:26:32 AM :

October 7, 2008

SynCom Media Group, Inc.  
4056 W 107th Court  
Westminster, CO 80031  
303.593.1433

Commissioner Robert M. McDowell  
Federal Communications Commission  
445 12th Street SW Room 8-C302

**FILED/ACCEPTED**  
**OCT 21 2008**  
Federal Communications Commission  
Office of the Secretary

Dear Commissioner McDowell:

I am the President of SynCom Media Group, Inc., and DC Broadcasting, Inc., with stations serving Denver, CO, and Washington, DC.

I am writing to express my support of an item pending before the Federal Communications Commission. The rulemaking you are about to vote on is of historical significance to the LPTV industry as well as to the general good of the public that relies on a multiplicity of voices serving a community. It is generally agreed that a diversity of voices is a desirable objective of the broadcast service to the public.

LPTV and Class A stations are limited in their ability to fulfill this vital mission for two interdependent reasons:

1. Cable TV is undeniably the gatekeeper which to a large extent determines the universe of programs available to the public. The lack of cable carriage is the determining factor in restricting the ability of most LPTV stations to make their programs available to a large portion of the viewing public.
2. The insecure status of LPTV stations due to their secondary nature effectively eliminates the capital investment necessary to make a legitimate business case to banks and other lending institutions. With the recent financial fallout LPTV stations have gone from a tough lending situation to one that is for all practical purposes impossible. This creates an inability to serve the public as well as they could with greater resources.

Now that the digital channel assignments of full service stations are virtually complete there would seem to be no conflicts with the full service transition if LPTV stations meeting the Class A requirements were allowed to apply for and be granted this secure status. Further, it would also be in the public interest if LPTV stations meeting the Class A service requirements were granted mandatory cable carriage. Long-term security would be in the public interest and would allow new sources available to the public, the likes of which have not been seen since the advent of broadcasting. The FCC has been examining "localism" issues and the LPTV industry can help to further this agenda.

In closing, mandated cable carriage for Class A stations and allowing qualified LPTV stations to advance to Class A status would solve many problems; for most stations improved programming could be provided and the public interest would be served.

Sincerely,  
Christopher Blair, President

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