

Barrington Broadcasting Group LLC

December 21, 2009

The Hon. Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Comments - NBP Public Notice # 26*
GN Docket Nos. 09-45, 09-51, and 09-137

Dear Chairman Genachowski:

Barrington Broadcasting Group LLC operates television stations in 15 geographically diverse markets across the country, ranging from in size from the 65th to the 199th DMAs. In smaller television markets, the local journalism, weather, emergency and entertainment programming we provide is, quite literally, a lifeline for communities. As the Commission considers the value of the services that broadcasters provide on their spectrum allocations, we hope that you will consider the particular needs of markets that we serve.

In particular, we hope that the staff is fully aware that intensive spectrum use is not limited to larger markets. In our smaller markets, we are putting our spectrum to intensive use to ensure that our audiences have the benefit of as much programming and news diversity as we can provide. And we are expanding programming availability at a time when others in the current economy might be cutting back. The cost of the historic digital transition that our industry just completed, in partnership with the Commission, was largely the same as the transition cost for broadcasters in top-10 television markets. But unlike our peers in large markets, our stations in markets such as Marquette, Michigan will take somewhat longer to recoup those costs. We are losing no time in putting the increased capabilities of digital to work for our markets.

For example, in many Barrington markets, there is not a sufficient complement of full-power stations to provide a local affiliation for every network. Without a local affiliate, network signals might be brought in from outside our markets, meaning that viewers would not have access to local news, sports, weather and emergency alerts. We are using digital multicast channels to make these networks available to our local markets. In some cases, we are providing ABC and Fox network programming on a multicast channel; in several other markets, we are providing the CW network on a multicast channel. This use of spectrum ensures that those who rely on over-the-air television in smaller markets are not disadvantaged in comparison to their counterparts in larger markets. Importantly, our viewers can receive this increased programming diversity at absolutely no cost, rather than being forced to subscribe to a cable or satellite system

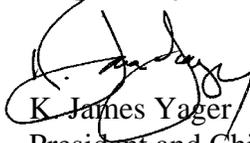
merely to obtain the channels that are the information mainstream of the United States. In still other markets, we are operating as a program incubator for nascent new networks that will further expand programming diversity in our markets. In all cases, viewers benefit.

But we also are moving ahead with more innovative plans for our local multicast channels as well. In Harlingen, Texas, for example, we observed that the sizable local Hispanic audience was underserved by traditional media. We thus decided to find an innovative way to use a multicast channel to serve this important audience. We now are launching a local, Spanish-language channel that will combine national programming from Mexicana with highly tailored local news and information programming from a local news outlet in Reynosa, Mexico, just across the border from Harlingen, and with original Spanish-language news to be produced by our station. We also will be able to provide local sports programming, in Spanish, for both Harlingen and Reynosa teams. The impact of a local Spanish-language service in a market the size of Harlingen, Texas, should not be underestimated -- we believe that this channel will make a real difference in the lives of the significant Hispanic community in our market.

Finally, we believe in the potential for Mobile DTV service. Our audiences are on the move, and our news, information and emergency programming must be as mobile as our communities. We intend to fully explore the potential for mobile in our markets.

Overall, Barrington stations plan an important role in the life of the communities we serve. We are not a one-channel programmer, but a locally focused, news-minded broadcaster that is intent on using all our spectrum resources in the service of our local audiences. Without the full range of spectrum services we can now provide, our smaller communities would have far less diversity and would have access to far less news and information. We urge the Commission to take these issues into account as it assesses spectrum use across the United States.

Respectfully submitted,



K. James Yager
President and Chief Executive Officer

cc: The Hon. Michael Copps
The Hon. Robert McDowell
The Hon. Mignon Clyburn
The Hon. Meredith Baker
Docket file