



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:

Draper Holdings operates Station WBOC-TV in Salisbury, Maryland, which provides vital news coverage to Delaware, as well as the Eastern Shores of Maryland and Virginia, collectively known as the Delmarva Peninsula. I am writing to provide the Commission a sense of how we are maximizing our spectrum allocation to serve our family, friends and neighbors here.

The Delmarva Peninsula has only two full-power television stations. Because of this shortage in the availability of over-the-air signals, we use our spectrum to provide the local community with complete CBS and Fox network programming. Without our spectrum allocation, over-the-air television viewers in Delmarva would have access to one fewer network in our already short market. And as one of the only sources of vital lifesaving and emergency information for Delmarva residents, it is critical that we continue to have the spectrum to be able to provide our services.

We produce a huge amount of local news on both WBOC and FOX 21 each day and we are one of the smallest markets in the country to produce every local newscast in high definition from a brand new \$7-million dollar digital NewsPlex. This quality programming provides real value to the everyday lives of our viewers. When a water main broke in Pocomoke City recently, we were the source for information about school delays, service disruptions, and the availability of emergency water to nursing homes. Last week, we were the TV station on the scene covering a string of local armed robberies and the continuing search for the suspects. The police even used our news helicopter to assist them in looking for the suspects. (We are the smallest television market in the country to operate a news helicopter.)

Because of our location on the Eastern Shore, one of our most important services is our local weather coverage. Hurricanes, tornadoes, life threatening northeasters and other severe weather threatens the Delmarva Peninsula ever year, and residents look to our coverage for information about these weather emergencies. Most recently when a northeaster tore through the area

1729 N. Salisbury Blvd.
Salisbury, MD 21801
(410) 749-1111
FAX (410) 749-2361

1839 S. Dupont Hwy.
Dover, DE 19901
(302) 734-9262
FAX (302) 734-3674

One The Square
Milton, DE 19968
(302) 684-8932
FAX (302) 684-8237

causing evacuations and flooding, WBOC provided non-stop news coverage during the duration of the emergency. And this past weekend WBOC and FOX 21 provided non-stop coverage of a severe winter storm that closed roads, businesses, churches and cancelled community events. We provided our viewers essential and potentially life-saving information on both WBOC and FOX 21. In fact we have scores of reporters and photographers all over the peninsula right now as I am writing you this letter, covering the aftermath of this winter storm and the impact on our viewers.

In addition to our breaking news coverage, we produce local debates and community issue programming. Our dedication to serving our community earned us the 2009 Edward R. Murrow Award for Excellence in Broadcasting as a result of the quality of our coverage. Some examples of this quality programming include a recent half hour special on the H1N1 virus, where we brought in a dozen experts to analyze the various public health issues, as well as to answer viewer questions. Prior to the digital transition, WBOC produced numerous specials on digital television and even hosted two members from the local FCC field office join us live on air during televised specials to explain the FCC's role and speak with viewers about the transition.

We also have plans to deploy mobile broadcasting. We believe that our viewers on the Delmarva Peninsula deserve information however they want it. And if the cable goes out because of a hurricane, we want everyone to be able to access our lifesaving news information via mobile broadcast.

WBOC is one of the most unique and dominant local TV stations in America. We are locally owned and invest in our community. People truly count on us every day for information, but we cannot reliably provide them with information that may very well save their lives without our spectrum allocation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Craig Jahelka', with a long horizontal flourish extending to the right.

Craig Jahelka

Vice President & General Manager

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