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Landmark Media Enterprises, LLC

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Executive Vice President

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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:

Landmark Media Enterprises is a privately held media company headquartered in Norfolk, Virginia. We are in the business of gathering and reporting local news and information to our customers over a variety of distribution methods, and to this end, we own and operate two local broadcast stations: WTVF, Nashville, Tennessee and KLAS, Las Vegas, Nevada, both of which are local CBS affiliates. I am writing to share the many ways in which WTVF and KLAS meet the viewership demands of their respective communities and to communicate the ways in which our spectrum is vital to providing the high quality, local coverage we provide every day.

Combined, WTVF and KLAS have too many accomplishments to mention in a brief letter, so I will focus on WTVF. NewsChannel 5 was one of the first twenty stations in the country to launch local high definition newscasts—an investment we were able to make based on the spectrum allocated to us. Further, WTVF employs two multicast channels to deliver additional local news on NewsChannel 5+ and a This TV channel.

On its primary signal WTVF produces over 35 hours of local news per week. Our award-winning investigative team exemplifies factual, unbiased journalism focused on news impacting the community. We have uncovered major corruption in government, as well as local consumer scams. A recent investigation revealed that a national fast food chain employed sexual predators in area restaurants. As a result of our coverage and at the expense of major advertising dollars, the restaurant changed its hiring policies. Other examples of our local investigative work include a continuing investigation to expose problems inside Nashville's 911 operation; uncovering an alarming rate of failure for Middle Tennessee's most common smoke detector; and exposing neglect of Tennessee veterans inside state-run nursing homes.

The Nashville designated market area is located in tornado ally. We go wall-to-wall in such weather events to make sure our viewers have the information they need to keep them safe. Following our extensive weather coverage during tornados and other severe weather storms, we receive emails and other viewer feedback telling us that we saved lives through our coverage alerting viewers. This is a community service we provide to save lives. No other means is as effective to communicate with the masses in real time.

We are a local news organization, but we also cover the world where it has local ties. We have traveled with the 101st Airborne Division to Iraq, traveled with local doctors to India after the Tsunami, and have traveled with local organizations to Africa in the fight against AIDS. The resources we invest in informing, serving and protecting the local community are extensive and expensive, but they enable us to provide news and information as to essential aspects of our community.

To further meet the needs of our local community, we launched NewsChannel 5+, a local cable station ten years ago. It is now our D-2 channel and is available to our entire designated market area. We generate over 25 hours of fresh local content each week, including a live 7:00 a.m. newscast (the only such newscast in the market on the three major affiliates). Further, in August 2009, we launched This-TV on our D-3 channel, and we will provide local programs on this channel in 2010.

On NewsChannel 5+, we serve the diverse mix of people in our community by targeting shows to specific groups. For example, we produce a show that focuses on issues of local interest to the growing Hispanic market in Nashville. Similarly we produce specific local shows for seniors, African Americans, and the gay and lesbian community. Other local programs focus on business, political issues, public service and other very targeted local communities. We also provide three hours of call-in programs a day. These shows provide an opportunity for the community to directly engage with local leaders, such as area mayors, superintendents of schools, police officials, and other local leaders. We are able to do long-form coverage of trials, extended breaking news and other key local events of interest to the community. This is a service we can provide our viewers because of the strength and resources of NewsChannel 5. Moreover, without the news gathering resources of NewsChannel 5, our website—NewsChannel5.com—would not be nearly as robust with local news and information.

Following the June 12 transition from analog to digital, we received an enormous outpouring of concern—literally, thousands of phone calls—from viewers no longer able to receive our signal. Many of them could not afford cable or satellite services and many had never been on the Internet. Over-the-air television is vital to these individuals for news and information, particularly during life threatening events.

Respectfully submitted,



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