

POST-NEWSWEEK

STATIONS, INC.

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:

Post-Newsweek Stations, Inc. is the television arm of The Washington Post Company. We operate broadcast stations in Detroit, Houston, Miami, Orlando, San Antonio, and Jacksonville, Florida. We program our stations with a strong local journalism orientation and commitment to serving our communities that pervades our operations. As the Commission considers the value of broadcasters' use of our spectrum, we hope that you consider the breadth and depth of the efforts that we, and our peers in the industry, are making to best serve our local communities.

The new all-digital television environment has opened new avenues for broadcast public service. Perhaps the most exciting of these avenues is Mobile DTV, a technology that we have been working hard to investigate and that we intend to deploy as soon as possible. Our audiences demand mobility, and we see Mobile DTV as a means to provide a new level of local service. We will expand access to our local signals, to be sure, but we also will be able to provide on-the-move emergency alerts and important emergency and crisis programming to viewers when they need it most. As you consider expanding wireless broadband access, we urge you to see digital television in general, and Mobile DTV in particular, as part of the family of mobile broadband offerings. The point-to-multipoint service provided by Mobile DTV will combine the programming expertise of local broadcasters with a robust DTV standard that puts the power of information into the pocket of every viewer with a mobile receiver. It will allow a constant and efficient stream of high-quality digital video that would not be possible under a point-to-point broadband system—and it will make it broadly available to all, not just the those who can afford a subscription service.

Digital multicast services, too, promise to expand the diversity and interest of free, over-the-air television broadcasting. Post-Newsweek is using its digital multicast channels to provide diverse, Spanish-language services to the significant Hispanic audiences in Houston, Miami, Orlando, San Antonio, and Jacksonville. Our broadcast of the LATV network provides a new channel of entertainment and information targeted to the underserved young Latino community in our cities, including local news, feature programming (including local concerts) and other information in the Spanish language that our stations provide. And it makes it available for free, to an audience that is more likely than the majority audience to rely on free, over-the-air television.

Multicast channels will provide important opportunities for diversity going forward. Station WJXT in Jacksonville provided full-length coverage of news conferences and other political and breaking-news events in 2009. In 2010, Station WJXT will begin airing women's SEC college basketball on multicast channels, and our team there is exploring broadcasting local high-school football games on multicast channels in the fall of 2010. Other stations also are considering expanding hyperlocal sports programming using the additional linear space provided by multicast channels. Station WDIV in Detroit is considering rebroadcasting its schedule of local public-affairs programs addressing urban and community issues, as well as local news, on its multicast channels to expand access to that programming. We believe that the space for innovation provided by the flexibility of digital spectrum will permit other multicast services to emerge as well, and our audiences will benefit greatly from these new services.

Of course, the centerpiece of our digital service continues to be our overall dedication to local journalism and community service. Our Florida and Texas stations are anchors of their local communities in providing essential weather services during times of hurricanes, flooding and other emergencies. In Houston, Station KPRC recently aired wall-to-wall coverage of the devastation of Hurricane Ike for 96 straight hours, as well as establishing phone banks so residents could obtain quick information about necessities such as food, gas and power. Our stations have focused attention through their long-form and news programming on heart disease, breast cancer, protection against privacy and security breaches, H1N1, and other important issues.

The Post-Newsweek stations are an important part of each local community we serve, and we use the breadth of our spectrum to serve our markets more deeply and effectively than was possible prior to the digital transition. Our teams' creative approaches to community service will be facilitated by the flexibility provided by our digital spectrum, and we urge the Commission to permit us to continue to innovate.

Respectfully submitted,



Alan Frank
President

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