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Paul H. McTear, Jr.  
President/Chief Executive Officer

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:

As the Federal Communications Commission considers proposals relating to television broadcast spectrum, it is critical that it fully appreciates the ways in which local television stations provide value to their communities of license through their use of that spectrum.

Raycom owns or operates 46 broadcast television stations in 36 different markets across the country. We pride ourselves on our strong local news and local programming efforts in every market we serve, and we are deploying both multicast channels and Mobile DTV to provide our communities with additional programming streams and additional access to our programming.

Across the board, Raycom stations provide their communities with robust local news and weather coverage, live sports coverage, and community issue programming. On average, our primary channels air approximately 30 hours of local news per week, with some stations providing as much as 47 hours per week, and our multicast channels provide many more hours of local news and political coverage. We provide this intensive local news coverage of our communities not only in our larger markets, but in our smaller markets as well.

We also believe that Mobile DTV will be a highly valued part of our communities' future. In fact, we already have built out two stations to provide Mobile DTV, which will provide valuable technical and commercial information to inform a broader launch of this service across our company. Station WBTV(TV), Charlotte, North Carolina, already is broadcasting a Mobile DTV signal. Station WSFA(TV), Montgomery, Alabama, will begin broadcasting Mobile DTV signals on January 1, 2010. We are aggressively investigating technical, commercial and other issues relating to mobile across our markets. Mobile will provide our communities with increased access not only to local news, sports and entertainment as people are on the move, but also will provide important new access to emergency weather information and breaking news in times of crisis.

Our stations are rigorously putting to use multicast capabilities, which provide an invaluable tool to deliver additional original news content and disseminate our news content more broadly, as well as to provide local weather coverage, foreign language and entertainment programming. Across Raycom, we provide more than 50 multicast channels to our communities, including more than 25 weather-oriented local multicast channels and 16 This TV channels that combine national entertainment programming with significant amounts of local news programming. Multicast provides viewers access to local content that broadcast stations would not otherwise be able to provide and that other content providers fail to provide. For example, the communities of Murrels Inlet, Litchfield and Pawleys Island, South Carolina are adjacent to the designated market area for Station WMBF(TV), Myrtle Beach, South Carolina, and less than fifteen miles from our studio. These communities are part of the Charleston DMA, however, and accordingly our Myrtle Beach station is not carried on cable or satellite there. Just eighteen months old, Station WMBF found a creative solution to this problem. It launched WMBF News XTRA on our multicast stream (32.2) so that Northern Georgetown County can receive local news and weather reports. We simulcast our news programs and also repeat those shows in other time periods throughout the day. If we did not have our multicast stream to provide this service, it is unlikely these viewers would receive this important programming from Station WMBF.

We are also using our multicast signals to supplement coverage on primary channels and enhance the quality of combined programming. In Memphis, Tennessee, Station WMC(TV) had competing demands for extensive coverage of multiple election contests on its main channel, making it difficult to focus intensively on any one race. But on its multicast channel, it provided in-depth coverage of the local mayor's race throughout election night. Station WMC made its primary channel viewers aware of this coverage using a crawl on the screen -- a technique that a number of stations that have multicast weather channels use to make viewers aware of that coverage during emergencies. Even on multicast channels dedicated to entertainment programming, such as our This TV channels, we provide many hours of local programming each week -- four hours per day, in many of our markets.

Digital multicast channels are one of the only places -- if not the only place -- viewers can see high school football games and other special events in Raycom's markets. This coverage is highly important to many in our communities, particularly parents and grandparents who miss a football game or high school graduation. Station WTOC (TV) in Savannah, Georgia has provided live coverage on its website of local high school and college graduations, so that family members unable to travel, including those in our military stationed overseas, can see their children and other family members graduate. Most recently, WTOC covered the annual Christmas parade in Hinesville Georgia, which is the home of the Army's Third Infantry Division, currently deployed and serving in Northern Iraq. Soldiers overseas could connect with WTOC's website to catch a glimpse of home and, for many, family members attending the parade. Needless to say, the military community has been enthusiastic about the potential this service has provided for military family members to participate in these essential life events while serving their country overseas. Although WTOC's web coverage did not require spectrum, of course, WTOC would not have been in a position to provide full, linear coverage of these events on the Web had it not already been broadcasting that programming on its primary or multicast channels.

Raycom is proud of the high quality and value of these uses of spectrum. Consider the ways in which one representative station, Station WSFA(TV), Montgomery, Alabama, has served its market. WSFA launched a weekly program to discuss local political topics in order to cover a special legislative session, but when WSFA realized the magnitude of the appetite for local political coverage, it institutionalized the program, which now airs every Thursday evening using WSFA's multicast signals. Viewers have had the opportunity to interact with members of Congress, the Governor, and every gubernatorial candidate in the upcoming 2010 election. That type of programming is not unique to WSFA. Station WBRC(TV), Birmingham, Alabama provides similar programming on a biweekly basis, and Station WTOL(TV), Toledo, Ohio provides special programming, such as a recent political debate for local Toledo candidates. These stations are able to provide this amount of informed local political coverage only by virtue of their digital multicast channels.

Local broadcast tailors its community programming to local concerns and interests. Last month, for example, WSFA produced an hour-long special on race relations in Montgomery, entitled "The Black & White of Racism Today." This thoughtful and provocative program kick-started a continuing dialogue in the community about issues of racism and the legacy of race relations in Montgomery. This significant community event aired on both WSFA's primary station and, subsequently, on its multicast channels for those viewers that missed its initial run.

Throughout the country, Raycom provides its viewers invaluable local news and programming, and through innovation, we provide it to as many viewers as possible. If our access to our current spectrum is limited or curtailed, communities in the Raycom family that have come to depend on our more intensive use of spectrum resources will lose access to these vital services. We hope the Commission can avoid this result, which would clearly be contrary to the interest of the public in our communities.

Respectfully submitted,



Paul H. McTear  
Chief Executive Officer

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