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By ECFS

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

**Re: Comments -- NBP PUBLIC NOTICE #26  
GN Docket Nos. 09-47, 09-51, and 09-137**

Dear Ms. Dortch:

Fisher Communications, Inc. ("Fisher") hereby files these comments in connection with the Commission's attention to spectrum management as it crafts the national broadband plan. Fisher is a publicly-held corporation based in Seattle, Washington that owns and operates 21 television stations in the Western United States, including the ABC and Univision affiliates in Seattle (KOMO-TV and KUNS-TV) and Portland, Oregon (KATU-TV and KUNP-TV). We appreciate the opportunity to provide these comments on behalf of our company and stations and hope that the Commission will consider them as it addresses this important issue.

Local broadcast television stations, like KOMO and KATU, are essential to maintaining vibrant and diverse local communities and they remain the most effective means of distributing video broadly and wirelessly. In fact, KOMO and KATU both reach nearly 90% of all television households within their markets. Local television stations have always been vital for healthy localism through continued focus on service to local communities. Stations like ours play a critical role in the fabric of our communities by distributing locally-relevant information for free; helping to develop and grow local commerce; and providing useful tools for emergency and public safety matters.

#### *Distribution of Relevant Local Content*

Local stations provide the most reliable network for transmitting breaking news information and traffic and weather alerts, live and on-location, in addition to daily news and weather services. We provide our local viewers with a diverse range of free entertainment and sports programming, including coverage of local high school sports games and events. We also provide the most comprehensive coverage of local political races and issues which helps to ensure an informed public citizenry.

During 2009, we at Fisher have launched a network of 83 hyperlocal neighborhood websites in the Seattle, Portland and Eugene markets (with other markets to follow). Our hyperlocal websites utilize local content from our television stations to provide our consumers and local residents with the best source of community and neighborhood-focused information about news, events, political issues and entertainment relevant to their day-to-day lives. Community news from our television station newsrooms is captured and posted on a real-time basis and complemented with user-generated and other third-party content. Added to this content are user comments which create a vibrant and robust social media conversation about important issues facing our local communities. All of these services are provided to consumers free of charge and are made possible because of past and continued commitments to local broadcast television.

### Role in the Development and Growth of Local Commerce

Broadcast television has always played an integral role in maintaining the health and vibrancy of local commerce and retail, and it remains the most effective way for local businesses to reach their desired audiences. The ability to reach all members of a community (as opposed to just those with the access, means or desire to pay for television or broadband services) sets broadcast television apart from other information sources in its ability to effectively serve the needs of local businesses. At Fisher, we have extended this model to also serve those small local businesses that are generally not large enough for television advertising. We have done so by using our television content to create our vibrant hyperlocal neighborhood sites. This has been especially important in the Pacific Northwest, which places a high value on locally-based businesses, including retail and restaurants. These are the unique neighborhood businesses that make our area such an interesting and vibrant place in which to live. None of this would be possible without the ongoing commitment to local broadcast television and a healthy newsroom that supports local coverage.

### Public Safety and Community Service Role

Broadcast television also plays a very important role in enhancing public safety and providing important public interest information to area viewers. Broadcasting remains the most reliable wireless communications system for delivering critical news and public safety information during times of emergency, including floods, fires, and earthquakes, because it can simultaneously transmit information to a mass audience on a point-to-multipoint basis.

The recent tragic slayings of four Lakewood, Washington police officers provides an example of the importance of broadcast television. Our station, KOMO-TV, provided valuable ongoing uninterrupted coverage and timely updates to our viewers as the officers' killer remained at-large within our community. This vital information helped our viewers cope with related public safety and traffic issues and the many neighborhood and street closures caused by the search. We provided coverage of the events on our television stations and websites, including our hyperlocal neighborhood websites. To bring our community together and help it deal with the incident, we also provided 7.25 hours of coverage of the public memorial for the slain officers on our station KOMO-TV, all commercial-free. Together with coverage provided by other local Seattle-area stations, viewing of this important public event peaked at 50% of the total overall television viewing audience, which shows the extremely high value members of our community place on local television and point-to-multipoint delivery.

Our stations take their community service responsibilities very seriously. At KOMO-TV alone, we dedicated over 10% of our advertising inventory during the past year to public service announcements (PSAs), all free of charge. These valuable resources have assisted many important groups and issues, including Make-A-Wish Foundation, Toys-for-Tots and local flood relief efforts. In addition to our PSAs, during the course of every year our stations and employees play a central role in many community events, like fundraisers for local causes and agencies, and holiday toy drives for children. These efforts will become even more effective as we begin to offer Mobile Digital Television services to our viewers in the coming months, which will allow us to reach and inspire our viewers even when they are away from their home televisions. Much of this community service role would remain unfulfilled without the commitment and dedication of local broadcast television stations.

### Role in Innovation

Our Seattle television station, KOMO-TV, is proud to be one of four stations in the country selected to test the technical parameters of the Mobile Digital Television system. The coming consumer roll-out of the Mobile DTV system will enhance the ability of local television stations to continue to play their vital role in local information, community service, commerce and safety. We at Fisher look forward to working with the Commission to ensure that viewers continue to receive local broadcast services that will remain important to their daily lives.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "C. B. Brown".

Colleen B. Brown  
President and Chief Executive Officer