



FREEDOM BROADCASTING, INC.

A Freedom Communications company

Doreen Wade
President

December 22, 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:

Freedom Broadcasting, Inc. operates television stations in seven markets from West Palm Beach, Florida to Medford, Oregon. As you and your colleagues move forward with assessing the value of broadcasters' use of our spectrum, we hope that you will consider our experience—which, of course, is just beginning with the advent of a true digital television ecosystem in the United States.

We have never defined our operations by a single programming stream. Instead, we have sought to use all our available resources to serve our communities on as many fronts as possible. We are actively exploring Mobile DTV technology in expectations of a near-term launch of that industry in 2010, but already have begun taking advantage of ways in which multicast technology can multiply our ability to serve our markets.

We have found multicast capacity to be an invaluable addition to our efforts to serve our communities. Our most innovative use of our multicast potential has been in West Palm Beach, Florida, where we have partnered with a group of local business leaders to create a full-time local Spanish-language channel focusing on the needs and interests of the Hispanic community. The Hola Vision channel operates on our multicast channel and uses station resources, but operates independently and as a new voice of the local Hispanic community. It provides news, talk, sports, weather (again, using our resources) and entertainment programming on a full-time basis. We also have provided training to Hola Vision employees. In many ways, the channel is operating like a full-time incubator for growing a new and vibrant voice for a discrete community in West Palm Beach. We are excited about the potential for this new channel, and look forward to continuing to foster its growth and development. Without our multicast channel and Freedom's commitment to use that channel to better serve our local communities, this new voice would not exist.

WWMT-TV
Grand Rapids
Kalamazoo
Battle Creek

WPEC-TV
West Palm
Beach
Ft. Pierce

WRGB-TV
Albany
Schenectady
Troy

WCWN-TV
Albany

WTVC-TV
Chattanooga

WLAJ-TV
Lansing

KFDM-TV
Beaumont
Port Arthur

KTVL-TV
Medford
Klamath Falls

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Our use of multicast spectrum also permits us to provide highly-valued programming to our communities. We provide the CW network in many of our markets that are too small to have a dedicated CW affiliate, thus providing free, over-the-air viewers with another entertainment choice (with, of course, a significant local component) without requiring subscription fees. We also have found that we can provide continuing coverage of weather emergencies most effectively by combining our efforts on our main channel and a multicast channel. We have often provided initial coverage of a weather event on the main channel, and then shifted continuing coverage to the multicast channel, while alerting new viewers joining the main channel to switch to the multicast channel for continuing coverage. The same has been true for election-night and other political coverage—we can multiply our effectiveness by using both outlets for coverage.

This is, to us, just the beginning. With the digital transition finally behind us and with consumers' new ability to receive our channels over the air, either with DTV receivers or converters, we are at the precipice of a new era of diversity of content and service. We intend to use our digital resources to bring these benefits to all in our communities—not just those who can pay for more programming by cable or satellite, or those who can pay for more mobility by subscribing to mobile Internet platforms. We can provide these benefits only if we continue to have broadcast spectrum as the foundation for these efforts.

We urge the Commission to allow us to continue to innovate.

Respectfully submitted,

Doreen Wade
President

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