DowLohnes

June 10, 2011

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF, ET Docket No. 10-235
Notice of Ex Parte Communication

Dear Ms. Dortch:

On June 10, 2011,Christopher D. Baker, Executive Vice President of Gray Television, Inc. ("Gray"), Robert A. Beizer, Vice President, Law and Development of Gray, and I met with Amy Levine, Special Council to Chairman Genachowski. The attendees discussed the material included in the enclosed handout. Specifically, we explained how Gray extensively uses its television stations' spectrum to provide both major and secondary network programming and to provide programming of local interest including local news to the mid-sized markets served by these stations. We also explained the critical need for Gray to retain control of its licensed spectrum so that it may continue to provide the high quality, innovative services upon which viewers rely for news, sports, weather, entertainment, and emergency preparedness. Finally, we discussed the Commission's assurances that broadcasters such as Gray would not be required to share channels or surrender spectrum involuntarily.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), we are filing a copy of this notice electronically and providing a copy each Commission participant in the meeting. Please contact me if you have any questions regarding the foregoing.

Respectfully submitted,

Kevin P. Latek

Enclosure

cc: Ms. Amy Levine

FCC Spectrum Presentation

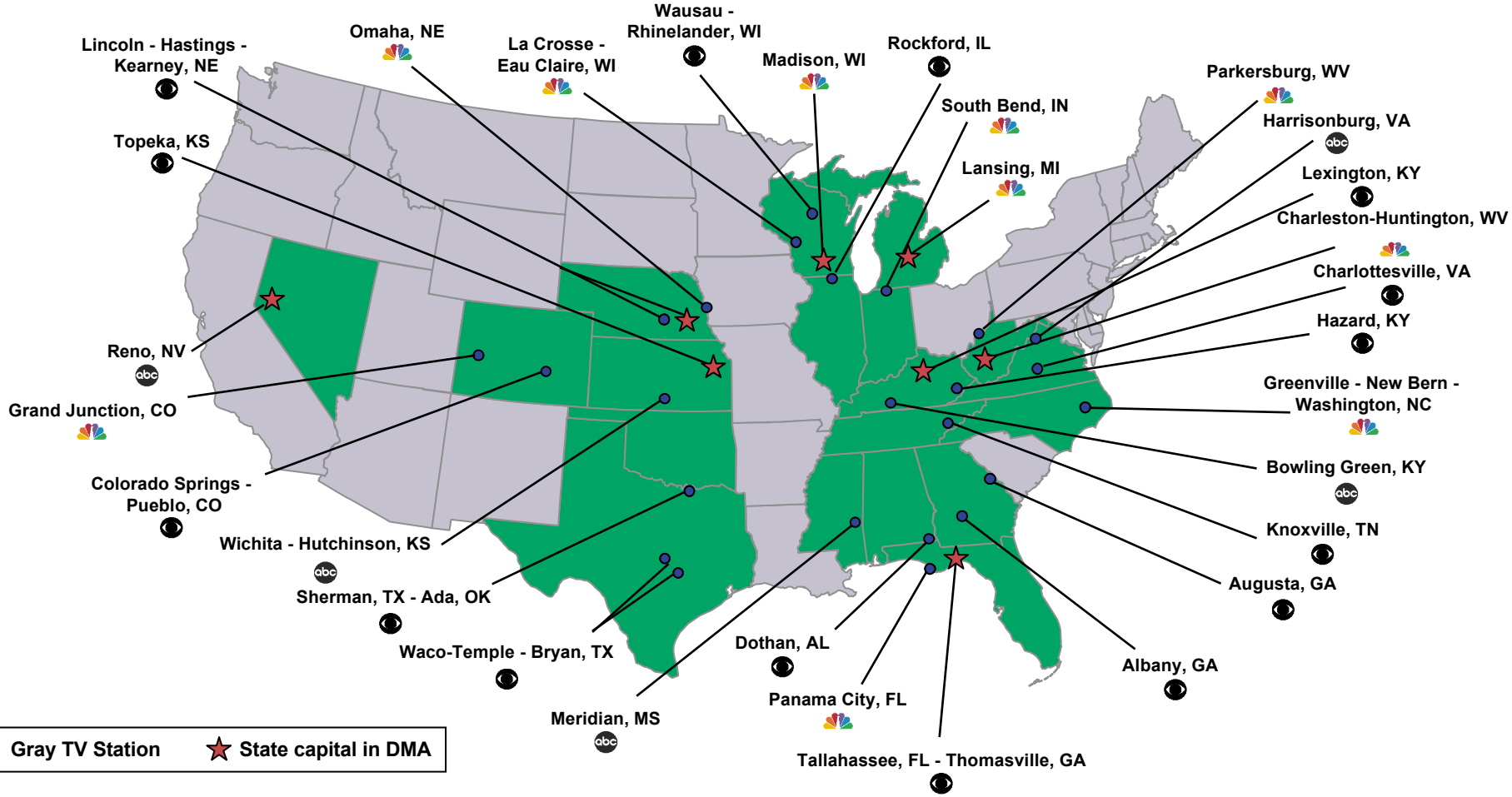
June 2011

GRAY
TELEVISION, INC.

Gray's National Footprint

GRAY TELEVISION, INC.

30 markets reaching approximately 6.3% of US TV households



GRAY TELEVISION, INC.

Leading Stations in Mid-Markets Across the Nation

- 76 channels of programming
- Spread across 30 markets
- 36 top 4 network affiliates, 40 digital #2 channels
- #1 channels in 24 markets, #1 News in 24 markets
- 17 collegiate markets, 8 state capitals

- #1 in overall audience in 24 of 30 Markets
  - All other markets #2 (except for Albany, GA)
- 16 stations rated #1 in the market for 50 straight years or more
- #1 in news in 24 of 30 markets
  - All other news markets #2

Extensively Utilizing Digital Spectrum

GRAY TELEVISION, INC.

40 new channels of programming, including:

- 1 Digital ABC station
- 5 Digital FOX stations
- 8 Digital CW
- 18 Digital MyNetwork TV
- 6 Local 24-hour news and weather channels
- 2 Digital Universal Sports Network
- 1 Digital The Country Network
- Potential for local VOD, games on demand, music on demand and other digital downloads
- Future delivery of television broadcasts to handheld mobile devices

In 2010, Gray Generated $9.9 Million in Revenue and $4.0 Million in BCF[1] from Additional Digital Channels

(1) *Excludes corporate expenses.*

Representative Examples: Local News on Multicasts

GRAY TELEVISION, INC.

By Extensively Use their Bandwidth, Gray's 36 Stations Broadcast 76 Separate Channels of Programming Available for Local Consumers

- WHSV-TV, Harrisonburg, broadcasts a multicast channel that simulcasts the programming available on its primary channel (ABC) except during local news hours. During those time periods, WHSV-TV broadcasts local newscasts directed at Winchester, Virginia. These multicast channel newscasts are the only television newscasts focusing on the greater Winchester area and therefore would not exist without multicast capabilities.
- WBKO(TV), Bowling Green, Kentucky, produces and airs a weekday local news show called Mid-Day that includes interviews, cooking segments, local non-profit groups, and local musical groups. In total, the station broadcasts or rebroadcasts over 21 hours of local news per week on its multicast channel.
- WSAZ-TV, Huntington, West Virginia airs, a live 30 minute newscast on its second channel in addition to replaying two morning newscasts.
- WTVY(TV), Dothan, Alabama, replays morning, mid-day, and evening newscasts on its multicast channel.
- KOLN(TV), Lincoln, Nebraska airs the only live 9 PM local newscast covering local government, news, weather, and sports.
- Many stations have a local weather channel which broadcasts 24 hours a day, 7 days per week or provide wall-to-wall coverage of local weather emergencies.

Additional Representative Examples

GRAY TELEVISION, INC.

- KBTX-TV, Bryan, Texas, airs the locally produced "Voices of Veterans," which is a 30-minute quarterly show highlighting former service men and women in the area, and "Names and Faces," which is a 30-minute quarterly show highlighting volunteers or familiar faces in the region. KBTX-TV also broadcasts Texas A&M Football programming and pre-game coverage on "Aggie Game Day."
- The stations in Charlottesville, Virginia, utilize the digital sub-channels to inform viewers of coming and active weather emergencies with live local weather coverage.
- WSAW-TV, Wausau, Wisconsin airs local cut ins on its 24/7 weather channel. It is the only local weather channel in the market.
- KKTV(TV), Colorado Springs, Colorado, airs the Colorado Springs Christmas parades and "Medal of Valor," an annual award ceremony for local law enforcement.
- WTAP-TV, Parkersburg, West Virginia carries community interest events such as the return of local military troops from overseas deployment and Parkersburg City Council meetings.
- KOLN(TV), Lincoln, Nebraska produces and airs a weekly, 30-minute program entitled "Prep Zone Weekly," which highlights local achievements of high school students.
- WRDW-TV, Augusta, Georgia, uses its DT-2 channel to carry a full slate of Southeastern Conference men's and women's collegiate basketball games that otherwise would not be aired in the Augusta DMA.
- Multiple Gray Television stations used their second channels to broadcast the local morning news when those stations broadcast on their main channel the coverage provided by their networks of the recent Royal Wedding.

Case Study: Gray's South-Central Stations

GRAY TELEVISION, INC.

CW-KYT (Lexington KY)

- KHSAA Basketball games January 9, March 13, November 27
- KHSAA Football games January 16, August 28, December 4
- Pikeville vs. Georgetown January 21
- Hope for Haiti January 22
- Pikeville vs. Univ. of Cumberlands February 27
- UK Baseball games April 6, 16, 17, May 7, 8
- Mayoral Debate May 13 and May 16
- Today at Keeneland Wed-Sun (April and October)
- Gary Henderson Show weekly (May and June)
- Election Coverage yearly (May and November)
- Junior Achievement Hall of Fame yearly (July)
- Behind the Blue monthly (September – June)
- UK Volleyball games September 1, 19
- KHSAA Volleyball games October 31
- KHSAA Soccer games November 7
- UK Women's Basketball November – February
- Donnie Tyndall Show weekly (December – March)
- Brian Lane Show weekly (December – March)

WBKO FOX & CW (Bowling Green KY)

- University of Kentucky games and specials
- Midday – Local news and public affairs M-F noon – 1pm
- Weekend marketplace
- Jefferson Awards: Profile in Giving
- St. Jude's Dream Home Giveaway and telethon
- Political Forums
- Hometown Christmas Special
- Sports Connection (weekly local sports program)
- Crusade for Children Remote Broadcasts
- Countdown to Country Special

Case Study: Gray's South-Central Stations

GRAY TELEVISION, INC.

FOX Texoma (Sherman TX)

- Double run all of the coach's shows.
- Produce and air local outdoor hunting/fishing show.
- Produce and air annual high school team profile show.
- Produce and air weekly high school Blitz scoreboard show for football.
- Hourly News/Weather updates that will be expanded to include two30-minute daily newscasts on August 1, 2011.
- Simulcast Severe Weather Wall-to-Wall coverage from main channel.

My Texoma (Sherman TX)

- Sports Programming with heavy regional interest such as Mavericks Basketball, Texas Ranger Baseball, NCAA Big 12 Basketball, Big 12 Coach's Shows from University of Texas, University of Oklahoma and Oklahoma State University.
- Produce and air coach's shows from Southwest Oklahoma State University.
- Produce and air high school coach's shows from two local high schools.
- Produce and air high school Invitational Holiday Basketball Tournament and a local charity golf event. Channel has produced and aired a Division I Collegiate golf event, The Perry Maxwell.
- Simulcasts Severe Weather Wall-to-Wall coverage from main channel.

MyVLT (Knoxville TN)

- Two minute news and weather updates at the top and bottom of every hour.
- United Way telethon
- Dogwood Arts Parade
- Babes in Toyland Parade for Children's Hospital
- Knoxville Christmas Parade
- UT and SEC Football games on weekends in season
- Men's UT & SEC basketball games - weekends & Wednesday Prime
- Women's UT and SEC basketball games on Sundays in season
- UT football pre-game tailgate shows
- UT Football and basketball recruiting specials
- UT Men's and Women's football and basketball coach's shows
- Live presentation of UT football weekly media conference,
- Weekly High School and UT Call in shows
- Weekly Local Hockey team coach's show
- Weekly UT Quarterback club show
- Produce Live high school football games on Thursday evenings in season
- Produce live East/West TN high school All Star game.