

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Time Warner Cable	)	File No. CSR-8578-C
	)	MB Docket No. 12-15
Petition for Finding of Bad Faith	)	
Retransmission Consent Negotiations	)	
	)	

To: The Secretary's Office  
Attn: The Media Bureau

**REPLY COMMENTS  
OF SAGAMOREHILL OF CORPUS CHRISTI LICENSES, LLC**

SagamoreHill of Corpus Christi Licenses, LLC ("SagamoreHill"), licensee of KZTV(TV), Corpus Christi, Texas, submits these Reply Comments to the Opposition that Time Warner Cable, Inc. ("Time Warner") submitted in the above-captioned proceeding.<sup>1</sup> SagamoreHill is not a party to, and has no interest in the outcome of, the retransmission consent dispute that is the subject of this proceeding. Unfortunately, Time Warner's Opposition contains a number of false and unsubstantiated claims about the management and operations of KZTV. Therefore, SagamoreHill is compelled to submit these Reply Comments to correct the record and provide the Commission with an accurate portrayal of how SagamoreHill actively manages and controls KZTV.

As an initial matter, SagamoreHill was surprised that Time Warner chose to drag KZTV into its dispute with KVOA Communications, Inc. ("Cordillera") over the right to retransmit the signals of KRIS-TV, Corpus Christi, Texas. SagamoreHill is not involved in any respect in the negotiations between Time Warner and Cordillera. Moreover, Time Warner currently retransmits KZTV, and SagamoreHill is not negotiating a new agreement at this time with Time Warner. When the current

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<sup>1</sup> See Opposition and Answer of Time Warner Cable Inc. to Petition for Finding of Bad Faith Retransmission Consent Negotiations, File No. CSR-8578-C, MB Docket No. 12-15 (filed Feb. 1, 2012) (the "Opposition").

retransmission consent agreement between Time Warner and SagamoreHill for carriage of KZTV comes up for renewal, SagamoreHill will negotiate a new agreement with Time Warner. Cordillera does not negotiate retransmission consent agreements for KZTV.

In any event, to counter Time Warner's incorrect accusations about the control and operation of KZTV, SagamoreHill attaches a Declaration of Mr. Louis Wall, the President and CEO of SagamoreHill. In his Declaration, Mr. Wall unequivocally demonstrates that he exercises active control over KZTV's programming, finances, and personnel, and that SagamoreHill has complied with all Commission rules and policies regarding the ownership and operation of KZTV. Accordingly, the Commission should disregard Time Warner's baseless accusations about KZTV.

Respectfully submitted,

**SagamoreHill of Corpus Christi Licenses, LLC**



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February 15, 2012

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of  
Time Warner Cable  
Petition for Finding of Bad Faith  
Retransmission Consent Negotiations

File No. CSR-8578-C  
MB Docket No. 12-15

To: The Secretary's Office  
Attn: The Media Bureau

**DECLARATION OF LOUIS WALL**

1. My name is Louis Wall, and I am President, CEO, and the ultimate owner of SagamoreHill of Corpus Christi Licenses, LLC and SagamoreHill Midwest, LLC (together, "SagamoreHill"), which own and operate several television stations in Corpus Christi, TX; Florence, SC; and Rochester, MN. I am also President and CEO of SagamoreHill Broadcasting, LLC, which operates television stations in Montgomery, AL; Columbus, GA; Cheyenne, WY; Scottsbluff, NE; and Laredo, TX.
2. I have more than three decades experience as an owner and operator in the television broadcast industry. I have served as a general manager for several television stations, and I have served as the television group head for more than one broadcast television company. At various times throughout my career, I have served on a number of television industry boards, including the ABC Affiliate Association, the South Carolina Broadcasters Association, and the Georgia Association of Broadcasters. I am a broadcast journalism graduate, and have never worked in any field other than television. I am first and foremost a broadcaster.
3. I am responsible for negotiating all retransmission consent agreements for KZTV(TV). When the current retransmission consent agreement between KZTV and Time Warner Cable, Inc. ("Time Warner") comes up for renewal, I anticipate that I will lead the negotiations for SagamoreHill, just as I have done many times in the past. In fact, I have historically enjoyed a positive and productive working relationship with Time Warner and the company's regional managers with respect to carriage of SagamoreHill's stations.
4. With the Commission's approval, SagamoreHill entered into a Shared Services Agreement with KVOA Communications, Inc. ("Cordillera") through which Cordillera provides local news programming to KZTV in an amount not to exceed 15% of KZTV's weekly program schedule. Even though Cordillera provides local news programming for KZTV, I retain active and ultimate oversight and control over this news programming. For example, before KZTV aired any news stories about the retransmission consent dispute between Cordillera and Time Warner, Mr. Tim Noble, President and General Manager of KRIS-TV, contacted me and asked

my permission to include these stories in KZTV's newscast. I believe that the dispute between Time Warner and Cordillera is of interest to Corpus Christi viewers. Therefore, I agreed that KZTV should air the news stories.

5. In addition to oversight of the news programming provided under the Shared Services Agreement, SagamoreHill directly and actively manages the selection, scheduling, and procurement of all programming on KZTV that is not the subject of the Shared Services Agreement. This programming accounts for more than 85% of the station's weekly schedule. I am responsible for negotiating all such programming agreements for KZTV, including the station's network affiliation agreement and syndicated programming agreements. Sherry Lemerond is KZTV(TV)'s Director of Programming and Traffic. She is employed by SagamoreHill and reports directly to me.

6. SagamoreHill is responsible and actively manages the day-to-day operations of KZTV. William Schutz is KZTV's Station Manager. He is employed by SagamoreHill and reports directly to me.

7. SagamoreHill is responsible for the finances for KZTV. As President and CEO of SagamoreHill, I monitor and oversee all financial aspects of the company.

8. SagamoreHill acquired the license for KZTV in May 2010, more than fourteen years after the DOJ proceeding mentioned in Time Warner's Opposition. Prior to acquisition of KZTV, I had no interest whatsoever in the operation of KZTV or any other station in the Corpus Christi market. Neither I nor any company under my control has ever been subject of any complaint alleging anti-competitive conduct.

9. I have read the foregoing Reply Comments. They are true and accurate.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.



Louis Wall

February 15, 2012

## CERTIFICATE OF SERVICE

I certify that on this 15th day of February, 2012, I caused the foregoing Reply Comments of SagamoreHill of Corpus Christi Licenses, LLC to be served by first-class mail, except where indicated by \*, on the following:

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