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April 30, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Written Ex Parte Communication in CS Docket No. 98-120

Dear Ms. Dortch:

I understand that the FCC has proposed to extend the viewability rule to ensure that must carry stations can be accessed by all cable subscribers regardless of whether they subscribe to digital, analog or hybrid systems. As the licensee of a station that depends upon mandatory carriage to reach cable television households, I support the FCC's proposal.

I am the President of WTVA Inc., licensee of WTVA-NBC, Tupelo-Columbus, MS. We first went on the air on March 18, 1957 and are proud of our tradition of news, educational and entertainment programming. WTVA has always recognized its vital responsibility to provide news and weather and public safety information, especially as a station located in "tornado alley". Last April 27-28, 2011, our station provided live weather alerts and information for almost 48 hours straight, when several communities had storm related deaths and one community lost 75% of their residential and commercial buildings. This storm system is considered the second most deadly tornado outbreak in U.S. recorded history, with over 300 deaths, 35 which were in our market. We know our dedication to public safety and communication saved lives.

I am aware of the National Association of Broadcasters' study documenting the potential harm to stations if they lose a portion of their viewers through changes to the viewability rule. While I cannot determine exactly how many of WTVA's viewers would be affected if the current rule is eliminated, one thing is certain: my station cannot afford a decline in viewership. WTVA has been the most watched station in Northeast Mississippi and Western Alabama for over 55 years. As broadcast television now competes with other communication streams (i.e. internet, mobile, etc.) we are competing aggressively for advertising revenue. If I cannot demonstrate that WTVA serves all of the households in its must carry market, advertisers could seek lower rates or even take their business elsewhere. With WTVA depending so heavily on advertising revenue, a decline in this revenue would cause serious financial problems for the WTVA and, consequently, for our service to the public. I agree with NAB's analysis of the financial impact of a losing access to cable households.

WTVA Inc. wishes to continue to serve all of the cable households within its market. For this reason, I strongly urge the FCC to retain the current viewability rule.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jane D. Spain".

Jane D. Spain
President

cc: William Lake, Michelle Carey, Mary Beth Murphy, Steven Broeckaert, Alison Neplok, Evan Baranoff, John Gabrysch