

MPS MEDIA

1181 Highway 315 • Plains • PA • 18702 • 570-970-5600 (Phone) • 570-970-5652 (Fax)

Received & Inspected

DEC 27 2012

FCC Mail Room

December 13, 2012

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

RE: MB Docket No. 09-182

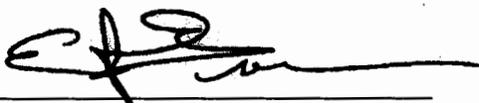
Dear Ms. Dortch:

We are writing to urge the Commission to continue to allow local television broadcast stations to freely enter into joint sales agreements ("JSAs") without such agreements triggering an attributable interest. In our experience, television JSAs allow broadcasters to realize efficiencies and cost savings that translate directly into benefits for viewers.

In 2008, MPS Media of Gainesville Licensee, LLC ("MPS"), licensee of Television Station WNBW, Gainesville, FL, entered into a JSA with New Age Media, WGFL, Gainesville, FL. At the time the stations entered into this agreement, neither station was producing or airing local news programming. The JSA enabled Station WGFL to invest in all of the costs associated with local news production, including hiring staff, upgrading its studio, and purchasing equipment and news vehicles. An agreement is in place between the parties for WGFL to produce local news content, weather and sports as part of an early evening and 11pm Monday – Friday Newscast airing on WNBW. Currently WGFL is producing 5 hours of Local News that airs on WNBW along with a Local News weekly "recap" broadcast on the weekends. The JSA has allowed for the launch of entirely new local news programming on both stations where it would not otherwise have been financially viable.

As broadcast stations face increasingly intense competition for both viewers and advertisers from pay TV providers and the Internet, the viability of local television newscasts declines, particularly in small markets. If Stations WNBW and WGFL no longer had the ability to work together under the terms of their current JSA, there would be harmful consequences for the stations, their employees, and local viewers. Unwinding the JSA would place both stations in precarious financial circumstances and force the licensees to implement all available cost-cutting measures, including reductions in staff and elimination of our local news programming. A loss of local news is a particularly significant in a market like the Gainesville, FL DMA, where only one other television broadcast station airs local news.

MPS and New Age Media strongly urge the Commission to consider the state of competition in local television markets as it evaluates whether JSAs should be attributed. Cable, satellite and the Internet have forever changed the competitive landscape. If broadcasters are not permitted to enter into efficiency-enhancing arrangements like JSAs, the direct result will be less coverage of local events and news and even the shuttering of some broadcast stations, especially in smaller markets with more limited revenue opportunities.



Eugene Brown, Sole Member

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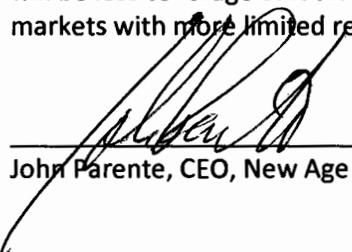
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John Parente, CEO, New Age Media

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