

**Tanana Valley Television Company  
3650 Braddock Street  
Fairbanks, AK 99071**

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., The Portals  
Washington, D.C. 20554

Re: MB Docket No. 09-182

Dear Ms. Dortch:

The proposal in Federal Communications Commission ("FCC") MB Docket No. 09-182 to make television Joint Sales Agreements ("TV JSAs") attributable for purposes of the FCC's multiple ownership rules (Section 73.3555 of the FCC's Rules) threatens to essentially invalidate a transaction which the FCC approved only last year. My company, a small locally-owned Fairbanks, Alaska, company, would be seriously threatened by this reversal by the FCC. My company borrowed \$2.3 million dollars based on the FCC's approval. Now, one year later, the FCC is proposing to make rule changes which would essentially rescind its prior approval.

The proposed "sunsetting" and ultimate nullification of these previously approved TV JSAs is not in the best interest of Fairbanks viewers and Fairbanks citizens at large. It certainly would be devastating to me, my company, and my 50 or so employees.

On March 5, 2012, with FCC approval, my company purchased assets and entered into contracts with another local television station which has allowed for increased local and minority (native Alaskan) ownership of television media in Fairbanks. This arrangement promotes virtually the only local media ownership in Fairbanks, as nearly all other television, radio and newspapers are owned by outside companies.

This arrangement also provides the only local television news product in Fairbanks. There has not been any decrease in news product provided to viewers. Two separate news organizations continue to exist with separate news management.

The ABC affiliate in Fairbanks is a satellite of the Anchorage ABC station, airing Anchorage news. If you take away the ability of small local owners to enter into TV JSAs, it will lead to all of the Fairbanks stations coming out of Anchorage.

Accordingly, the FCC should "grandfather" any existing TV JSAs and not require them to "sunset" within two years.

Respectfully,

TANANA VALLEY TELEVISION COMPANY

A handwritten signature in black ink, appearing to read 'William St. Pierre', is written over the company name. The signature is stylized and includes a long horizontal stroke extending to the right.

William St. Pierre  
President