

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Bellizzi Broadcasting Network, Inc.)	CSR-8837-M
Station WEYW-LP, Key West, Florida)	MB Docket No. 13-244
)	
Facility ID No. 130765)	
)	

To: Office of the Secretary
Attn: Chief, Media Bureau

REPLY

Bellizzi Broadcasting Network, Inc. (“Bellizzi”), licensee of Low Power Television Station WEYW-LP (Channel 19), Key West, Florida (“WEYW”), files its Reply to the Opposition to Complaint (the “Opposition”) filed by Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates (“Comcast”). The Comcast Opposition opposes the Complaint (the “Complaint”) filed by Bellizzi, which seeks carriage on Comcast’s Key West, Florida cable system, serving the community of Key West, as well as other communities located in Monroe County, Florida. Comcast’s argument is incorrect. In view of this, the Commission should grant WEYW its required must-carriage rights. In support of its position, Bellizzi submits the following.

Bellizzi demonstrated in its Complaint that WEYW is a “qualified” low power television station for must-carry purposes with respect to Comcast’s cable system. The Commission’s

rules¹ implement sections of the Communications Act of 1934, as amended (the “Act”)² requiring low power television stations such as WEYW to meet a specific set of criteria to qualify for must-carry status. Contrary to Comcast’s Opposition, WEYW meets all applicable rules for carriage on Comcast’s cable system as a “qualified” low power television station. Grant of the Bellizzi Complaint would be fully consistent with all regulatory requirements.

Comcast does not dispute the fact that both the Communications Act and the Commission’s rules require carriage of “qualified” low power television stations under certain circumstances. A low power television station that conforms to the requirements contained in the Act and Part 74 of the Commission’s rules is considered “qualified” if: (1) it broadcasts at least the minimum number of hours required pursuant to Part 73 of the FCC’s rules; (2) the station adheres to Commission obligations and requirements regarding the broadcast of non-entertainment programming and employment practices, and the Commission determines that the programming of the low power television station addresses local news and informational needs that are not being adequately served by full power television broadcast stations; (3) the station complies with interference regulations consistent with its secondary status; (4) the station is located no more than 35 miles from the cable system’s headend and delivers to the principal headend an over-the-air signal of good quality; (5) the community of license of the station and the franchise area of the cable system were both located outside the largest 160 Metropolitan Statistical Areas (“MSAs”) on June 30, 1990, and the population of such community of license on that date did not exceed 35,000; and (6) there is no full power television broadcast station

¹ See 47 C.F.R. § 76.55(d).

² See 47 U.S.C. § 534(h)(2).

licensed to any community within the county or other political subdivision (of a State) served by the cable system.³

Comcast does not specifically dispute Bellizzi's assertion that it complies with Commission requirements with the exception of one point, the restriction that there be "no full power television broadcast station licensed to any community within the county or other political subdivision (of a state) served by the cable system."⁴ According to Comcast, WEYW is not a "qualified" station for must-carry purposes because there are two full power broadcast stations licensed to Key West, Florida (WGEN-TV and WSBS-TV). The community of Key West is located in Monroe County, which also contains Comcast's Key West cable system and each community served by the Comcast cable system.

Comcast claims that the Complaint is effectively asking the Commission to waive the requirements required under the Act, which the Commission lacks the power to do.⁵ According to Comcast, since Bellizzi cannot meet the statutory criteria that is required for WEYW to be considered a "qualified" low power television station for must-carry purposes, the Commission must deny the Bellizzi Complaint.

Bellizzi is well aware of the wording of the Act, since Bellizzi, in its Complaint filed with the Commission, cited the requirements that must be met for a low power television station to be considered "qualified." Contrary to Comcast's declaration, Bellizzi does not ask the Commission to waive any part of the statutory definition of a qualified low power television station.

However, it is not required that the Commission waive the statute in order to reach and approve of Bellizzi's argument on the merits. There is judicial precedent for the principle that

³ See 47 U.S.C. § 534(h)(2)(f); 47 C.F.R. § 76.55(d).

⁴ See 47 C.F.R. § 76.55(d)(6).

⁵ See e.g., *Complaint of Washington County Television, Inc. against DR Partners, d/b/a Donrey Cablevision*, 10 FCC Rcd. 3766 (1995).

“seemingly mandatory language” in the Communications Act does not prevent the entertainment of arguments which, on their face, would violate that statutory language “where extraordinary circumstances indicate that justice would thus be served.”⁶ In the *Gardner* decision, the petitioner argued that it had good cause for filing its petition for reconsideration beyond the 30 day statutory requirement. The Court held that, notwithstanding, the clear statutory language in the Act limiting reconsideration petitions to those filed within the 30 day limit, the Commission was not prevented from considering the late-filed petition for reconsideration because of “extraordinary circumstances.”

As in *Gardner*, it is not necessary here that the Commission waive the Act in order to grant Bellizzi’s Complaint. There are sufficient grounds for concluding that this matter involves “extraordinary circumstances” warranting special treatment as to Bellizzi, notwithstanding the language in the Commission’s rules and the Communications Act.

What is present in this case is a low power television station, WEYW, which provides substantial programming addressing local issues and needs not being served by any full power television station in its community of license and service area. WEYW is the only television station to provide local coverage of issues to Key West and Monroe County. Combined with this fact is the reality that the cable system which would deny carriage to WEYW is a true gargantuan, and is the leading provider of entertainment and communications products and services in the United States.⁷ Comcast is so dominant that the Commission has previously sought to limit the influence of Comcast by imposing restrictions on how it can do business,

⁶ *Gardner v. FCC*, 530 F2d 1086, 1091 (D.C. 1976) (“*Gardner*”). See also *Mediacom Southeast, LLC*, 22 FCC Rcd. 4825 (MB 2007).

⁷ *Applications of AT&T Mobility Spectrum, LLC et al.*, 27 FCC Rcd. 16459 (2012) (“*AT&T Mobility*”).

because of the Commission's fear that Comcast will monopolize the local market and restrict competition to the detriment of local video competitors and the viewing public.⁸

The Commission has repeatedly stressed the importance of localism to the objectives of the Communications Act.

“[T]he concept of localism has been a cornerstone of broadcast regulation for decades. The concept derives from Title III of the Communications Act of 1934, as amended, and is reflected in and supported by a number of current Commission policies and rules.”⁹

The Commission has repeatedly recognized the historic importance of low power television as a local service, concluding that “in many cases, low power television stations may be the only television station in an area providing local news, weather and public affairs programming....[L]ow power television stations may provide the only local service to residents of discreet geographical communities within those markets....”¹⁰

As noted in its Complaint, since early 2011, WEYW has provided a substantial amount of programming addressing local news and informational needs in Key West and Monroe County, which needs are not being addressed by *any* full power television station. WEYW broadcasts approximately 28 hours of local programming each week. Its programs focus on local news and information. Bellizzi previously provided illustrations of the daily programming which it provides in attachments to the Declaration of Bellizzi's President, Rick Bellizzi, attached to the Complaint. A copy of the Bellizzi Declaration is attached hereto as well. That Declaration contained letters from city and county government officials acknowledging WEYW's performance providing local service to Key West and Monroe County. Attached hereto is also a

⁸ See *Applications of Comcast Corp., General Electric Co. and NBC Universal, Inc. (For Consent to Assign Licenses and Transfer Control of Licenses)* (“Comcast Order”), 28 FCC Rcd. 4238 (2011).

⁹ See *eg.*, *Broadcast Localism, Report on Broadcast Localism and Notice of Proposed Rulemaking*, 23 FCC Rcd. 1324, 1327 (2008).

¹⁰ *Establishment of Class A Television Stations (Reconsideration)*, 16 FCC Rcd. 8244, 8246 (2011).

letter, dated November 20, 2013, from Congressman Joe Garcia, stating that WEYW is “a huge asset to and integral part of our community here in the Florida Keys [and] it is the only local station currently broadcasting news and weather to the residents of Monroe County. It is in the only station hooked up to the Emergency Operations Center (EOC) as well as to NOAA’s state of the art, nationally utilized Weather Center, located in Key West.”¹¹

While WEYW, according to the Congressman representing Key West, “fills a critical gap for the citizens of Monroe County,” the so-called Key West stations that Comcast cites as its excuse for refusing carriage of WEYW provide virtually no local service and none in English, the language spoken by the vast majority of residents (80%) in Key West and Monroe County.

Bellizzi demonstrated this fact in its Complaint. It can scarcely be contested that both WGEN and WSBS’s programming is broadcast in Spanish and, as shown in Bellizzi’s Complaint, focuses on the interests of the Hispanic population in Miami-Dade County and Broward County. WGEN stated as much in its petition for special relief, which, when granted by the Commission, modified that station’s market for cable carriage and accorded the WGEN must-carry rights throughout Miami-Dade County and Broward County. The Commission itself has recognized that the station “airs primarily Latin American-based Spanish-language programming, locally produced nightly news, news specials and local public affairs, opinion and entertainment programs, all of which focus on issues important to the listed communities [all located in Miami-Dade County and Broward County].”¹² The Commission concluded that the station provides “an extensive array of programming directed specifically at the non-Mexican, Latin American residents of the communities [located in Miami-Dade and Broward Counties].”¹³

¹¹ See also November 22, 2013 Letter of Bob Vitas, City Manager, the City of Key West attached hereto.

¹² *Mapale, LLC*, 24 FCC Rcd. 8362 (MB 2009).

¹³ *Id.* at para. 13.

In view of the programming goals of Stations WGEN and WSBS to provide a local service to Spanish language residents located in the Miami DMA, specifically in those communities located in Miami-Dade County and Broward County, WEYW fills a critical gap in local programming for those viewers residing in Key West and Monroe County.

For its part, in 2011, Comcast owned and operated cable systems serving nearly 24 million subscribers. It was a producer of a substantial amount of programming content, owning interests in eleven national programming networks (before its acquisition of NBC Universal and General Electric Co.) as well as interests in a variety of regional local programming networks and several regional sports networks. It offered broadband Internet access service over its cable plant and, in 2011, had almost 16 million customers. It owned a minority stake in a movie studio as well as holding online and wireless interests. With the approval of the FCC in 2011, Comcast acquired and now operates two broadcast networks as well as numerous broadcast television stations and motion picture and television production studios. However, in approving Comcast's acquisition of General Electric Co. and NBC Universal, the Commission observed that the merger would give Comcast increased incentive and ability to harm competition by engaging in discriminatory actions against, among others, video programmers. The Commission granted the merger with numerous conditions which sought to address potential competition claims, including Comcast's ability to discriminate against its competitors.¹⁴

Comcast's current action seeking to avoid carriage of WEYW is exactly the type of anticompetitive action that the Commission has previously sought to restrict. The Commission previously has noted that an action by a regulatee may not violate a statute or rule; however, it may result in public interest harm by substantially frustrating or impairing the objectives or

¹⁴ *Comcast Order*, 26 FCC Rcd. at paras. 49-59.

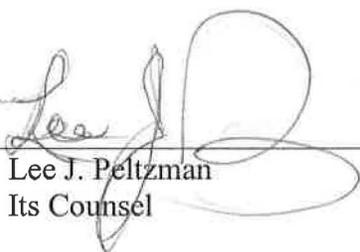
implementation of the Communications Act.¹⁵ Comcast's action refusing to recognize WEYW's qualifications for cable carriage substantially frustrates and impairs the Commission's local programming objectives, which, as noted herein, derive from the Communications Act. It is not just Bellizzi who is harmed, but the viewing public, which is deprived of the opportunity to receive the programming of the sole station providing local programming and filling a critical gap in service to Key West and Monroe County residents. In view of this, "exceptional circumstances" are present and warrant the Commission's grant of Bellizzi's Complaint.

As in *Gardner*, justice must be served. Bellizzi's Complaint must be granted and Comcast should be directed to carry WEYW on its system as required under the Commission's rules.

Respectfully submitted,

BELLIZZI BROADCASTING NETWORK, INC.

By: _____



Lee J. Peltzman
Its Counsel

Shainis & Peltzman, Chartered
1850 M Street, N.W.
Suite 240
Washington, D.C. 20036

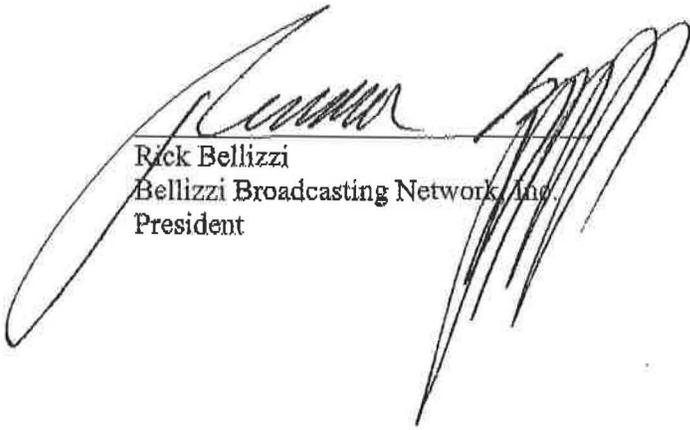
Date: November 25, 2013

¹⁵ *AT&T Mobility Spectrum LLC*, 27 FCC Rcd. at para. 10.

DECLARATION

I, Rick Bellizzi, am the owner and President of Bellizzi Broadcasting Network, Inc. ("Bellizzi"), licensee of Station WEYW-LP, Key West, Florida. I have reviewed the Reply which is being filed today and I declare that it contains information which is true and correct to the best of my knowledge, information, and belief and is made under penalty of perjury.

November 25, 2013



Rick Bellizzi
Bellizzi Broadcasting Network, Inc.
President

JOE GARCIA
26TH DISTRICT, FLORIDA

1410 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-2778

Congress of the United States
House of Representatives
Washington, DC 20515-0926

November 20, 2013

Chairman Tom Wheeler
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Wheeler,

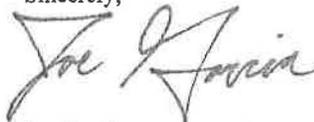
I write today in regards to WEYW Channel 19 – a huge asset to and integral part of our community here in the Florida Keys. WEYW-19 is the only local station currently broadcasting news and weather to the residents of Monroe County. It is the only station hooked up to the Emergency Operation Center (EOC), as well as to NOAA's state of the art, nationally utilized Weather Center located in Key West.

In this way, WEYW fills a critical gap for the citizens of Monroe County. It has the ability to deliver routine travel and weather advisories, broadcast moment-to-moment health and safety information in the event of a natural or manmade disaster, and to instigate and expedite evacuation procedures by sharing EOC messaging with residents and visitors across the county.

WEYW-19's daily programming has also become an important and giving part of our local community. The locally produced talk shows aired on WEYW, which I have been a part of personally, are great sources of public information dissemination in the areas of health, wellness, and community involvement and organizing.

Bellizzi Broadcasting Network provides an invaluable service – where there is otherwise a definitive lack – to me and each of my constituents in Monroe County. I ask that you bear this in mind as you contemplate the station's future.

Sincerely,



Joe Garcia
Member of Congress



Bogdan "Bob" Vitas Jr.
City Manager

THE CITY OF KEY WEST
P.O. BOX 1409
KEY WEST, FL 33041-1409

3132 Flagler Avenue
(305) 809-3888
FAX 809-3886
bvitas@keywestcity.com

OFFICE OF THE CITY MANAGER

November 22, 2013

WEYW TV Channel 19
5300 US Highway 1
Key West, Florida 33040

To the WEYW TV Channel 19 Family:

On behalf of the City of Key West, I want to thank you, your anchors, production crew and staff for the truly outstanding television broadcasting services you provide to the residents of not only our city, but throughout the entire Florida Keys. There is no other television service provider that does a better job than WEYW when it comes to local programming.

As you well know and understand, Key West represents 33% of the Monroe County population and is one of the most remote cities in the entire United States. Our citizens and millions of annual visitors need and demand a local television service provider such as WEYW to insure that pertinent local information is provided on a daily basis. More importantly, in times of emergency or crisis the residents and visitors can depend on emergency broadcasting on WEYW.

On a personal note, my family and I recently relocated to the Florida Keys this past summer and have found your television programming to be extremely useful and informative on life here in the Keys. Thank you for making the transition to island living most enjoyable!

Sincere regards,


Bob Vitas
City Manager

Key to the Caribbean - Average yearly temperature 77° F.

DECLARATION

I, Rick Bellizzi, am the owner and manager of Bellizzi Broadcasting Network, Inc. ("Bellizzi"), licensee of Station WEYW-LP, Key West, Florida. I hereby declare that the Complaint filed against Comcast Communications contains information which is true and correct to the best of my knowledge and belief and is made under penalty of perjury.

WEYW, under the ownership of Bellizzi, commenced broadcasting on the cable system on AT&T U-verse in Dade, Broward and Monroe Counties, in the Miami DMA and on Comcast in Monroe County on July 1, 2011. We have operated WEYW by adhering to all relevant FCC requirements imposed on full-power television stations regarding non-entertainment, political and children's programming as well as providing broadcast news and informational programming that is locally oriented and addresses local needs that are not being addressed by full-power stations. WEYW also complies with the Commission's interference rules. Key West has fewer than 35,000 individuals in its population. WEYW provides a signal to the Comcast cable systems currently. We also meet the other FCC requirements for a "qualified" low power TV station.

As I noted, since July 2011, WEYW has operated as if it were a full-power television station. We are the only station in Key West which provides a daily talk show containing local content for the residents of Monroe County. We conduct interviews with local government officials as well as non-profit organizations. Comcast at one time provided a local news, information and talk show until February 2011, employing a staff of five people who were located in Key West. Comcast disbanded their operations in February 2011 and WEYW has filled that gap, not only with our local programming, but by employing three of the five individuals laid off by Comcast. We provide at least 28 hours of local

programming each week.

Since Bellizzi has operated WEYW, Comcast has gone out of its way to engage in anti-competitive activities against WEYW. Therefore, even though we had entered into what we thought was a valid Retransmission Consent Agreement, we were not surprised to see that Comcast terminated it recently. When Bellizzi initially operated WEYW, we had a leased access agreement with Comcast with respect to its cable systems in which we were overcharged at a rate that was approximately 250% of what should have been charged. In addition, Comcast competes with WEYW by selling 30 second spots to businesses in the Florida Keys and it is my chief competitor in selling such ads locally. Obviously, owning the cable system that controls the video programming that is seen by a majority of Monroe County viewers, Comcast has a huge advantage in controlling the pipeline, which they are not shy about utilizing to their favor. As an example, when Comcast first agreed to carry WEYW on their cable systems, they claimed that they were not able to carry us on our Channel 19, the prior owners of WEYW, New Colonial Broadcasting had been broadcasting on Channel 19 prior to losing their connection due to being overcharged for lease access. When we purchased WEYW, we requested Channel 19 back, Comcast said it was no longer available to us even though that channel was and remains available to this day, once again making it difficult for viewers to find the local television station, as all other television stations and lease access are being broadcast between 02 and 25 in the lower tier. The shabby treatment which Comcast accords WEYW is symptomatic of how it has treated other low power TV stations in Key West and Monroe County. Comcast has consistently overcharged local LPTV systems and, at times, has lowered its advertising rates to a point, below cost, in order to place its local competitors at an economic disadvantage.

I have attached letters from city and county governmental officials thanking WEYW for providing service to their communities as well as letters from non-profit organizations and from the viewing public attesting to WEYW's excellent local programming over the past two plus years. Also attached is a list of individuals interviewed on our daily program "Good Morning Florida Keys."

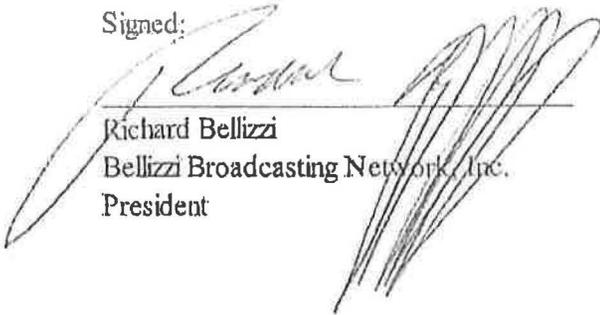
Comcast cites stations WGEN and WSBS as the reason why Comcast need not treat WEYW as a "qualified" LPTV station. However, these television stations, while licensed to Monroe County, broadcast totally in Spanish, a language the vast majority of Key West and Monroe County residents do not understand. Moreover, these television stations program to a completely different viewership -- Spanish speaking viewers residing in Miami-Dade and Broward Counties. In no way do I mean to challenge the qualifications of these stations, as they do a good job serving the needs of their intended viewers. However, these stations do not function as local Key West or Monroe County broadcasters and they should not be treated as such in order to defeat the valid claim of WEYW to must-carriage.

It should additionally be noted that WEYW also provides service throughout the entire Miami DMA. We have invested considerable resources in constructing a Miami studio. However, despite the fact that WEYW broadcasts programming which is responsive to the needs and interests of residents of Miami-Dade County, WEYW, nonetheless, broadcasts substantial amounts of programming which is directly responsive to the problems, needs and interests of the residents of Key West, our community of license, and Monroe County.

Being carried on cable is required for a station to successfully provide local service in Monroe County. WEYW is a "qualified" LPTV station and should be treated as such. Comcast should not be rewarded for its anti-competitive conduct.

September 8, 2013

Signed:



Richard Bellizzi
Bellizzi Broadcasting Network, Inc.
President



 MARY DEASY
Commission # EE 185653
Expires April 2, 2016
Bonded Thru Troy Fain Insurance 800-365-7019

-----Original Message-----

From: ginger <arfkeys@aol.com>
To: klayton_fennell <klayton_fennell@cable.comcast.com>
Sent: Thu, Jun 16, 2011 1:40 pm
Subject: WEYW

To whom it may concern,

Our local television station based out of the Florida Keys, WEYW Channel 19, is scheduled to be turned on with Comcast and At&t U-Verse. U-Verse is currently airing the station on Channel 19 and Comcast is scheduled to broadcast on Channel 87. Being as this station is the only television station broadcasting news and weather information for the viewers of Monroe County and currently hooked up to the EOC (Emergency Operation Center) in case of hurricane or other emergency situations in the county, it is difficult to understand why Comcast is airing this station on a channel that is not accessible to many residents in the Florida Keys.

The station is petitioning Comcast to move this station to Channel 19 so it will be available to all Monroe County residents who are Comcast subscribers but is coming under some resistance by Comcast.

According to the station owner, Rick Bellizzi, Direct TV and Dish Network will be carrying this station on Channel 19 as well and it would seem only fitting that the Florida Keys station be uniform with all other networks to avoid any confusion.

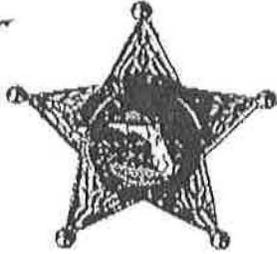
This station will also be hooked up to NOAA weather service in Key West. This will allow the station to interrupt local broadcasting in order to let the community know of severe weather situations and hurricane evacuation updates throughout Monroe County.

The access to Channel 87 is not available to basic cable users. The information distributed through this station will have a direct impact on the safety and well being of citizens as well as visitors. To this end, it is important that the information be available to even the most basic Comcast users. I am asking for any assistance you can provide in convincing Comcast that the movement of WEYW from its current channel location to Channel 19 would be beneficial and in the best interest to all residents of Monroe County.

If I can be of any further assistance, please contact me.

Thank you for your assistance,
Ginger Snead
Mayor City of Marathon

Sheriff



Monroe County Sheriff's Office

Robert P. Peryam, Sheriff

5525 College Road

Key West, Florida 33040

(305) 292-7000 FAX: (305) 292-7070 1-800-273-COPS

www.keyss0.net

SUBSTATIONS

Freeman Substation
20950 Overseas Hwy.
Cudjoe Key, FL 33042
(305) 745-3184
FAX (305) 745-3761

Marathon Substation
3103 Overseas Hwy.
Marathon, FL 33050
(305) 289-2430
FAX (305) 289-2497

Islamorada Substation
87000 Overseas Hwy.
Islamorada, FL 33036
(305) 853-7021
FAX (305) 853-9372

Rail Building
50 High Point Road
Beverly, FL 33070
(305) 853-3211
FAX (305) 853-3203

DETENTION CENTERS

Key West Det. Center
5501 College Road
Key West, FL 33040
(305) 293-7300
FAX (305) 293-7353

Marathon Det. Facility
3981 Ocean Terrace
Marathon, FL 33050
(305) 289-2420
FAX (305) 289-2424

Plantation Det. Facility
53 High Point Road
Plantation Key, FL 33070
(305) 853-3266
FAX (305) 853-3270

SPECIAL OPERATIONS

P.O. Box 300973
Marathon, FL 33050
(305) 289-2410
FAX (305) 289-2498

AVIATION DIVISION

10100 Overseas Hwy.
Marathon, FL 33050
(305) 289-2777
FAX (305) 289-2776

COMMUNICATIONS

2796 Overseas Hwy.
Marathon, FL 33050
(305) 289-2351
FAX (305) 289-2493

To: Rick Bellizzi / General Manager WEYW-Ch. 19
From: Colonel Rick Ramsay
Date: 26th June 2012
Ref: Letter of Appreciation

Rick, I have had the pleasure to work with the staff at WEYW-Ch 19 in an effort to inform and educate the general public about public safety issues.

We have had the pleasure to come on your television station and do the "Follow the Law" program in an effort to inform and educate the general public.

I have also had the opportunity to come on your program and discuss Hurricane Evacuation for public safety as well as other important areas of concern for the citizens and visitors to Monroe County.

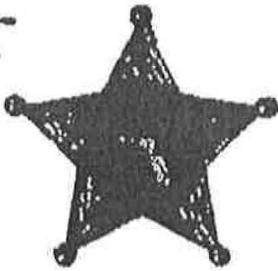
Your staff has been amazing to work with and I have really enjoyed coming on the show and working with such positive and professional people such as Jenna Stauffer.

These public service partnerships between the Sheriff's Office and WEYW are so important to us as an agency.

Please thank your staff for all that they have done and mostly to you for your community partnership with us.



Sheriff



Monroe County Sheriff's Office
Robert P. Peryam, Sheriff
5525 College Road
Key West, Florida 33040
(305) 292-7000 FAX: (305) 292-7070 1-800-273-COPS
www.keyssso.net

June 14, 2011

SUBSTATIONS

Freeman Substation
20950 Overseas Hwy.
Cudjoe Key, FL 33042
(305) 745-3184
FAX (305) 745-3761

Marathon Substation
3103 Overseas Hwy.
Marathon, FL 33050
(305) 289-2430
FAX (305) 289-2497

Islamorada Substation
86800 Overseas Hwy.
Islamorada, FL 33036
(305) 664-6480
FAX (305) 852-5254

Roth Building
50 High Point Road
Tavernier, FL 33070
(305) 853-3211
FAX (305) 853-3205

DETENTION CENTERS

Key West Det. Center
5501 College Road
Key West, FL 33040
(305) 293-7300
FAX (305) 293-7353

Marathon Det. Facility
3981 Ocean Terrace
Marathon, FL 33050
(305) 289-2420
FAX (305) 289-2424

Plantation Det. Facility
53 High Point Road
Plantation Key, FL 33070
(305) 853-3266
FAX (305) 853-3270

SPECIAL OPERATIONS

P.O. Box 500975
Marathon, FL 33050
(305) 289-2410
FAX (305) 289-2498

AVIATION DIVISION

10100 Overseas Hwy.
Marathon, FL 33050
(305) 289-2777
FAX (305) 289-2776

COMMUNICATIONS

2796 Overseas Hwy.
Marathon, FL 33050
(305) 289-2351
FAX (305) 289-2493

Comcast
1010 Kennedy Drive
Key West, FL 33040

To Whom It May Concern:

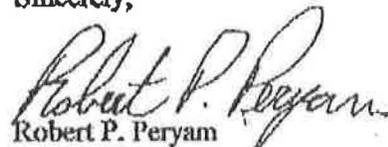
I am writing on behalf of WEYW, a new local television station which will soon begin operation here in the Florida Keys. It is going to be helpful, in emergency situations and at times when we need to communicate with our citizens, to have a local station broadcasting news and weather. I wish them all the best in their efforts to make this station work.

It is my understanding the station will be operating on Channel 19 on U-Verse, and potentially on channel 19 on Direct TV and Dish Network also. It would seem to me that having the station broadcasting on Channel 19 on Comcast as well would make sense.

Being uniform and consistent is crucial when trying to communicate information to the public. We don't have emergencies very often, but when we do, we at the Sheriff's Office do need as many ways to reach the public as possible.

The folks who are starting up the station have asked me to lend my support in asking Comcast to move their television station from the currently designated Channel 87 to Channel 19. I think you should certainly give the idea every consideration.

Sincerely,


Robert P. Peryam
Sheriff of Monroe County

RPP/vam





State Attorney

DENNIS W. WARD
State Attorney

SIXTEENTH JUDICIAL CIRCUIT OF FLORIDA
530 WHITEHEAD STREET
KEY WEST, FLORIDA 33040-6547

TELEPHONE
305-292-3400

WEYW TV Channel 19
5300 US Highway 1
Key West, FL 33040

To the ownership, staff, anchors and production crew,

I want to extend to WEYW Channel 19 my sincere appreciation for the content of your local programming. The law enforcement community needs the assistance of our local media outlets to inform the public of important information concerning their welfare. The segments concerning the school anti-bullying curriculum, and the multiple segments related to spice and bath salts, helped provide valuable illumination on relevant local issues concerning the safety of our children.

I applaud your station for having the vision to incorporate these compelling stories within your broadcast and encourage you to continue this practice in cooperation with local authorities. I remain,

Respectfully yours,

Manny Madruga
Chief Assistant State Attorney
16th Judicial Circuit



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
Florida Keys National Marine Sanctuary
33 East Quay Road Key West, FL 33040
Phone: (305) 809-4700 Fax: (305) 293-5011

January 2, 2013

Rick Bellizzi
WEYW Channel 19
5300 U.S. Highway 1
Key West, FL 33040

Dear Mr. Bellizzi:

Thank you for adding the "Waterways" television series to the WEYW Channel 19 broadcast rotation. Through the airing of "Waterways," your station has helped increase ocean stewardship among Florida Keys residents and visitors alike.

"Waterways" is a collaborative outreach effort between Florida Keys National Marine Sanctuary, Everglades and Dry Tortugas National Parks, and the U.S. Environmental Protection Agency to raise awareness of the importance of preserving south Florida marine and freshwater resources, and bring attention to research and marine conservation issues. Your viewership is an ideal audience for these programs.

I also appreciate your willingness to show our public service announcements and feature sanctuary staff on your "Good Morning Florida Keys" show. Please contact me should any additional show opportunities arise and I will continue to send you any new educational programs we develop.

Sincerely,

Karrie Carnes
Communications Coordinator



FL Keys Unit



Rick Bellizzi <rick.bellizzi@gmail.com>

Letter of Appreciation, Chanel 19 Environmental PSA Support

1 message

Donald Lanman <donaidd@keysbank.com>
To: "Rick.bellizzi@gmail.com" <Rick.bellizzi@gmail.com>
Cc: Angie Walterson <AngieW@keysbank.com>

Fri, Oct 19, 2012 at 3:23 PM

Hello Rick,

Attached is a letter of appreciation for the support Channel has provided in the airing of the Bank's important environmental message to the local community and world in general.

We sincerely appreciated your support. Thank you.

Kind Regards,

Donald K. Lanman

Senior Vice President & Marketing Director

First State Bank of the Florida Keys

1201 Simonton St., Key West, Florida 33040

O: 305-293-7149, C: 305-395-3384, Fax: 305-296-6231

DonaldL@KeysBank.com www.KeysBank.com

Please consider the environment before printing this email.

Channel 19 TV PSA Letter 10-12.doc
101K



Rick Bellizzi <rick.bellizzi@gmail.com>

Thank you for having us

1 message

Lissette Cuervo <Lissette.Cuervo@wesleyhouse.org>
To: "rickbellizzi@gmail.com" <rickbellizzi@gmail.com>

Tue, Feb 5, 2013 at 5:00 PM

Hi Rick,

Thank you so much for having us today. Being able to speak about our 30th Anniversary Valentine's Day Gala on your station will do great things for our marketing campaign for this event.

It is because of local support like that of channel 19 that we can attribute our success in helping the children and families of Monroe county. You enable us to get information out to our community, therefore raising awareness about our agency and how someone can support our mission of: Promoting and enhancing the safety, well-being and development of children my educating, supporting and meeting the needs of families.

We appreciate all that you do for our community.

Best regards,

Lissette Cuervo Carey

Media & Events Coordinator

Wesley House Family Services

305-809-5000 ext 228 office

305-797-6800 cell

www.wesleyhouse.org

WEYW-TV
5300 US Highway 1
Key West, FL 33040

Dear Jenna,

I wanted to thank you and the rest of the station for providing relevant local programming for those of us in Monroe County. It is a treat to be able to tune in daily to see what's happening in our community. You all do such a great job of reaching out to everyone from Key Largo to Key West.

I look forward to watching as this station grows bigger and better.

Keep up the great work and don't ever underestimate the value you provide to our local community.

Sincerely,

Dr. Rebecca Spacke
Brand New Day Enterprises
Marathon, Florida



Rick Bellizzi <rick.bellizzi@gmail.com>

Moolah-Good Morning Florida Keys Show

2 messages

Donald Lanman <dona1d1@keysbank.com>

Thu, Jul 26, 2012 at 2:11 PM

To: "rick.bellizzi@gmail.com" <rick.bellizzi@gmail.com>, "weywtv@aol.com" <weywtv@aol.com>

Cc: Angie Walterson <AngieW@keysbank.com>

Rick,

On behalf of all your friends at First State Bank of the Florida Keys thank you for providing time for the interview with Moolah, Tom O and Jenna for the Channel 19 *Good Morning Florida Keys* show. We are adding a promotional web banner to KeysBank.com today promoting the Morning Show and Moolah interview that will air tomorrow. I can't wait.

We also appreciate your consideration to air the Moolah the Dancing Manatee Going Green promotional video as a PSA. Hopefully, our combined local efforts can help reenergize the green movement in the Keys and worldwide.

Please pass on my personal thanks and best wishes to Jenna Stauffer, Ed Krane, and your entire staff for their courtesy and professionalism.

Kind Regards & Go Green,

Don

Donald K. Lanman

Senior Vice President & Marketing Director

First State Bank of the Florida Keys

1201 Simonton St., Key West, Florida 33040

O: 305-293-7149, C: 305-395-3384, Fax: 305-296-6231

DonaldL@KeysBank.com www.KeysBank.com

Please consider the environment before printing this email.



19 October 2012

To: Mr. Rick Bellizzi, General Manager WYVW Channel 19
5300 US HWY 1, Key West FL. 33040, 305-896-0650

SJ: Environmental PSA: Moolah the Manatee Go Green Message

Dear Mr. Bellizzi,

On behalf of our local Board of Directors, President Karen Sharp and the team at *First State Bank of the Florida Keys*, I would like to extend our sincere appreciation to you and Channel 19 for supporting our local green initiatives by running the Bank's environmental green PSA.

Both the live coverage of the PSA on the Channel 19 Morning Show and ongoing airing of the PSA clearly demonstrated your community commitment and support for important environmental issues.

Sincerely,

Donald K. Lanman
Senior Vice President, Marketing Director
First State Bank of the Florida Keys
1201 Simonton St. Key West, FL 33040
305-293-7149

July 2nd:

Florida Keys Outreach Coalition Client/ Shared success story of being homeless on the streets to now holding a stable job

July 3rd:

Les Jackson/ American Cancer Society/ Talked about the organization's 100th birthday

Kim Fisher/ Son of the legendary Mel Fisher / Discussed his father's legacy and what they are doing to keep it alive

Brooke Babineau/ Author

July 10th:

Roxanne Fleszar/ Financial Advisor/ talked about the benefits of saving for retirement at a young age

Jean Thornton/ Diver for Mel Fisher/shared story of finding treasure and working with Mel

Christopher Norwood/Key West Africana Festival/talked about cultural tourism and bringing more African Americans to Key West

July 11th:

Jennifer Hulse/ Attorney/ Discussed the issue of dredging the Key West Channel for larger cruise ships and the benefits it will have on the community

Bill Lorraine/ Artist/Composer/Discussed his latest piece , The Hemingway Suite which is a tribute to Key West's greatest artist, Ernest Hemingway. Cubans and Americans

Paul Hardt and his 11 year old students from Eastview School in Illinois/ Showed the first of three videos clips the students made for the show. It talked about the history of Key West.

July 12th:

Michael Gilda/ Arts and Historical Society/discussed the 4 major attractions they control throughout Key West

Elissa Bishop Becker/ Professional Counselor/Talked about how to deal and cope with loss

July 16th:

Dr. Stephen Ragusea/ Clinical Psychologist/ Discussed pain pill addiction and the negative impact it has on people

July 17th:

Robert Coburn/Author

Keith Bland/Artist/Discussed his current work and new exhibit at the Studios of Key West

Jolly Benson/ Chairman of Responsible Tourism Key West/ Discussed the issue of dredging the Key West Channel for larger cruise ships and the negative impact it will have on the community

July 18th:

Holly Raschein/ State Representative/Discussed issues facing Monroe County

Diana Dobson/ Community Activist/ talked about surviving and living well with AIDS and discussed the importance of AIDS education

July 19th:

Valerie Carr/Case Manager for Samuels House/Talked about the organization's success of helping women in Monroe County find jobs and housing after dealing with issues such as homelessness and incarceration

Caroline Cotton/Travel Agent/ Gave travel tips for the summer

George D'Angelo/ Hemingway Look Alike Contestant/ Talked about the importance of the contest and why he flies down from Philadelphia every year for it

Kaleigh Baker/ Singer/Songwriter/Talked about her upcoming tour throughout the country and why Key West is one of her favorites places to perform

July 24th

David Sloan/ Author/Entrepreneur/ Talked about his latest cookbook and founding the annual Key West Key Lime Pie Festival

Stephanie Kaple/ Florida Keys Outreach Coalition/Talked about the success of the organization and additions they are making to their housing units

Paul Hardt and his 11 year old students from Eastview School in Illinois/ Showed the second of three videos clips the students made for the show. It talked about the history of Key West.

July 25th

Jennifer Whaley/ Physician at Womankind/ Talked about self breast exams and the benefits of doing them every couple of months

Elizabeth Young/Executive Director of the Florida Keys Council of the Arts/ Talked about summer programs and events

Elizabeth Warner/Local author

July 26th

Judi Bradford/ Local Artist/Discussed her upcoming tour to England to make fascinators hats which are a growing trend throughout the country

Fiona Molloy/ Singer/Entertainer/Talked about her career in both Ireland and the US

July 31st

Landon Bradbury/Father of a 2 year old son diagnosed with Lymphoma/Talked about finding out the news and the overwhelming financial and emotional support from the Keys

Sheri Pogue/ Local Radio Host/Talked about her past pain pill addiction and the devastating impact it had on her life

CERTIFICATE OF SERVICE

I, Malinda Markland, do hereby certify on this 25th day of November, 2013, that a true and correct copy of the foregoing "Reply" has been sent via U.S. mail, postage prepaid to the following:

William Lake, Chief, Media Bureau
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Barbara Kreisman, Esq.
Chief, Video Division, Media Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Florida Department of State
Cable and/or Video Franchising
Division of Corporations
Clifton Building
2661 Executive Center Circle
Tallahassee, Florida 32301

Florida Department of Agriculture and Consumer Services
Division of Consumer Services
Terry Lee Rhodes Building
2005 Apalachee Parkway
Tallahassee, FL 32399-6500

Monroe County Administrator's Office
1100 Simonton Street
Suite 205
Key West, FL 33040

Wesley R. Heppler, Esq.
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1919 Pennsylvania Avenue, NW Suite 800
Washington, DC 20006


Malinda Markland