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January 30, 2014

VIA ECFS

Accepted/Files

Marlene H. Dortch
Secretary
Federal Communications Commission
45 12th Street, SW
Washington, DC 20554

JAN 30 2014

Federal Communications Commission
Office of the Secretary

Re: MB Docket Nos. 09-182 and 07-294

Dear Madam Secretary:

On January 30, 2014, Rebecca Hanson, SVP of Strategy and Policy for Sinclair Broadcast Group met with Thomas Reed, Director of the Office of Communications Business Opportunities, and Daniel Margolis, Attorney Advisor of the Office of Communications Business Opportunities. Ms. Hanson presented the attached presentation and discussed the benefits of joint sales agreements (JSAs) and shared services agreements (SSAs) to local broadcasting, news production, and minority media ownership.

She described the economics of the broadcast business, and the challenges that some stations face in smaller markets, where the hard costs of producing news often exceed a station's share of advertising revenue in that market, making news financially impossible to produce. JSAs and SSAs provide a solution for those stations by sharing the resources and costs, generating news for both stations to monetize with ad sales. These arrangements also facilitate bank financing, which is increasingly difficult to secure by stand-alone stations.

Ms. Hanson also described the community-based local programming of Armstrong Williams, America's only African American full-power television station owner, and how his ownership opportunities might not have been possible without his Sinclair JSA/SSA arrangements.

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Ms. Hanson also described how the FCC has set out guidelines for JSAs and SSAs that the industry has relied upon for many years.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Clifford M. Harrington". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Clifford M. Harrington

Attachment

cc: Thomas Reed
Daniel Margolis