



February 19, 2014

BY CDBS

The Honorable Thomas Wheeler  
The Honorable Mignon Clyburn  
The Honorable Jessica Rosenworcel  
The Honorable Ajit Pai  
The Honorable Michael O’Rielly  
Federal Communications Commission  
445 12th Street, NW  
Washington, DC 20554

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

Dear Chairman Wheeler and Commissioners Clyburn, Rosenworcel, Pai, and O’Rielly:

I am writing on behalf of WLOO, a television owned and operated by Tougaloo College, a historically African-American college, founded in 1869. WLOO was formerly WUFX, and is licensed to serve Vicksburg, Mississippi market. We appreciate the Commission’s record of being a strong champion of diversity in media ownership. Given how important that interest is, we believe you will be as concerned about the possible benefits of Joint Sales Agreements (JSAs) for new, diverse entrants into the television industry, as we are. In our experience, a JSA can be vital to allowing new, diverse entrants into the television business to provide services to the community.

Tougaloo College became a new entrant into the television industry in late 2012, when the College acquired WUFX, now known as WLOO. At the same time, we also entered into a JSA with WDBD, LLC, licensee of WDBD(TV), Jackson, Mississippi. Quite simply, without the JSA, we would not be able to operate the station as effectively as we do. The JSA allows us to invest our limited resources in programming, infrastructure and student education that have a meaningful impact in our community.

Here are a few examples of the real benefits brought about by the efficiencies created by the JSA:

- We are entering the content production business, and we are excited to announce that our first program, I.M.A.G.E., will be premiering soon. “I.M.A.G.E.” stands for “Imagine Making A Greater Effort...To Do the Right Thing.” It is a youth television show starring teens that uses performing arts such as drama, music, and dance to educate teens and help them make the right choices. I.M.A.G.E. uses thought-provoking visual vignettes, in the style of Saturday Night Live, to raise the awareness of students in grades 6-12.

The program addresses important teen issues, such as abuse, drinking, texting and driving, bullying, healthy eating, tobacco use, teen pregnancy, and violence, in an accessible, entertaining way. We plan to premiere our pilot episode in the 2nd quarter of this year. We intend to launch the program locally and throughout the state of Mississippi first, and we already have had expressions of interest concerning national syndication of the program.

- We are in the midst of upgrading our station to high definition (HD) capability, and should have the process completed in March. This is a very expensive undertaking, and the investment would not have been feasible without the revenue we derive from the JSA. Whether viewers receive our signal using over-the-air television, or whether they subscribe to pay-TV services, we think that they will be very pleased with the quality of our upcoming HD signal.
- We are proud to be an early affiliate of Soul of the South network. This is a newly-launched network that covers the events, lifestyles, and culture of African-American Southerners.<sup>1</sup> Soul of the South provides a range of programming, from documentaries and dramas to comedies, movies, and talk shows. The network also provides news coverage.<sup>2</sup> Soul of the South has been well-received by viewers, and we are excited to see the network develop and expand.
- Tougaloo College has discussed the possibility of creating original new programming for Soul of the South and for other possible national distributors. While these discussions are preliminary, WLOO is optimistic that programs such as I.M.A.G.E. will provide an opportunity for the College to become a new programming voice on the local, regional, and national stage.
- As a college-owned station, WLOO seeks opportunities to advance the educational mission of Tougaloo College. As part of our initiative with the mass communications students at the College, we provide real-world, hands-on experience for students interested in production and other aspects of television station operations.

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<sup>1</sup> See <http://www.ssn.tv/the-station/>.

<sup>2</sup> See <http://www.ssn.tv/soul-of-the-south-news/>.

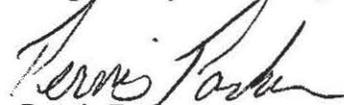
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Although we are still relatively new to the television world, we have enough experience to know that without the efficiencies permitted by our JSA, and the revenues it produces, we simply would not have been able to invest in creating new original programming or upgrading WLOO to HD. These investments, in turn, have enhanced our ability to be a strong affiliate to our networks and to provide a valuable training ground for Tougaloo College's mass communications students.

We urge you to take into account experiences such as ours, and to consider how JSAs permit a range of new, diverse voices to thrive in the modern media marketplace.

Respectfully submitted,



Pervis Parker

General Manager and Chief Creative  
Officer

cc: Maria Kirby  
Adonis Hoffman  
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Courtney Reinhard  
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