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April 6, 2014
(Correction and Substitution of April 4, 2014 Letter)

VIA HAND DELIVERY AND ELECTRONIC MAIL

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Attn.: William T. Lake, Esq.
Chief, Media Bureau

RE: FCC File Nos:
BALCDT-20130809ADE, WABM(TV), Birmingham, AL
BALCDT20130809ADF, WHP-TV, Harrisburg, PA
BALCDT-20130809ADG, WMMP(TV), Charleston, SC

Dear Ms. Dortch:

This letter is being submitted on behalf of Howard Stirk Holdings, LLC ("HSH"), with regard to HSH's proposed acquisition of three television stations. HSH's proposed acquisitions are in connection with the Sinclair Television Group, Inc.'s ("STG") acquisition of the Allbritton Television Group ("Allbritton Transaction"). *This letter corrects and replaces HSH's original request filed Friday, April 4, 2014.*

On March 20, 2014, STG filed a letter with the Commission (the "March 20 Letter") proposing to revise the structure of the Allbritton Transaction as a result of the Commission's Public Notice dated March 12, 2014 (DA 14-330), with respect to the processing of transactions including sharing arrangements and contingent interests, as well as proposals announced by the Commission to make JSAs immediately attributable. Since the proposed transactions between STG and HSH (and certain other parties to the applications) included JSAs and other sharing arrangements, in order to facilitate a more timely grant, STG proposed in the March 20 Letter, among other things, to (i) terminate its agreement to sell television station WMMP, Charleston, SC (BALCDT-20130809ADG) to HSH, and to find a new buyer for the station without any sharing arrangements, (ii) terminate its agreement to sell television station WABM(TV), Birmingham, AL (BALCDT-20130809ADE) to a third party with sharing arrangements and to find a new buyer for the station without any sharing arrangements, and (iii) terminate its

agreement to sell television station WHP-TV, Harrisburg, Pennsylvania (BALCDT-20130809ADF) to a third party with sharing arrangements, and to retain the license and certain related license assets of WHP-TV and sell the license and related license assets of WHTM-TV (which it will acquire from Allbritton), as well as all of the non-license assets of WHP-TV and the non-license assets of WLYH-TV, Lancaster, PA (together with the right to provide services to WLYH-TV under a grandfathered LMA), to a third party buyer without any sharing arrangements.

Since the date of the March 20 Letter, the Commission has indicated that it will allow parties to seek a waiver of the JSA attribution rules in certain circumstances in which such a waiver would serve the public interest. As a result, HSH believes that if it is able to obtain assurance from the Commission that STG will be granted such a waiver, and that the proposed transactions will satisfy the processing guidelines found in the March 12, 2014 Public Notice, STG will be willing (i) to re-consider selling to HSH the license assets and rights in certain programming for WMMP on the same terms and conditions and with the same sharing arrangements proposed in the original application on file in connection with the Allbritton Transaction, (ii) to consider selling to HSH the license assets and rights in certain programming agreements for WABM(TV), with substantially similar sharing arrangements as proposed in the WMMP application, and (iii) to consider entering into with HSH similar sharing arrangements as proposed in the WMMP application in order to facilitate HSH's purchase of the license assets of WLYH-TV (which non-license assets are currently owned by Nexstar Broadcasting, Inc., but which are subject to an option exercised by HSH on February 27, 2014 and which transaction was proposed in a letter to the Commission dated January 15, 2014). HSH understands that STG still currently intends to retain the license and related license assets of WHP-TV and to sell the license and related license assets of WHTM-TV, along with all of the non-license assets of WHP-TV, to a third party not subject to any sharing arrangement with STG, as proposed by STG in the March 20 Letter.

HSH believes that based on its established record as a broadcaster, as well as the long and distinguished record of its sole owner, Armstrong Williams, it meets the public interest standards to qualify for a waiver. HSH is submitting this letter requesting assurance from the Commission that if a waiver of the JSA attribution rules is requested with respect to its acquisition of television stations WMMP (as such transactions are proposed in the applications currently on file) and of television station WABM(TV) and WLYH-TV(on substantially similar terms and conditions and similar sharing arrangements), waivers and the applications will be granted in a timely manner. As STG pointed out in its March 20 Letter, the Allbritton Transaction may be terminated by either party without cause if the Closing does not occur by July 27, 2014. HSH is concerned that if STG is not able quickly to get assurance that the

Commission will grant such a waiver request and will permit the processing of the applications without the considerations contemplated in the March 12, 2014 Public Notice, STG will not be willing to consider this proposal due to concerns that it may result in STG being unable to consummate the transactions prior to the termination date of the Allbritton Transaction.

Armstrong Williams is one of the few African American television broadcasters today, having recently purchased television stations WMMB, Myrtle Beach, SC and WEYI-TV, Flint Michigan. HSH believes if the Commission looks at what Mr. Williams has done at these two stations, it will have a strong indicator of how HSH intends to run WMMP, WLYN and WABM. The acquisitions of WMMB and WEYI-TV have already demonstrated HSH's independence as a programmer of stations that it owns and has shown a considerable positive impact on the public interest. Mr. Williams has extensive broadcasting experience, both on air and as a producer, and has always been committed to public affairs programming, particularly issues that impact minorities and other groups underrepresented in the media. Mr. Williams entered into sharing arrangements to acquire these stations because he would not have otherwise been able to obtain financing to purchase them on his own and to take advantage of the economies of scale that result from receiving certain non-programming services from another in-market station. It is the sharing arrangements that allow him to provide the new more extensive local programming as described in further detail below. The JSAs do not provide STG control over the programming of either station, which programming remains solely in the control of Mr. Williams and which control he has inarguably demonstrated.

Listed below are some of the public interest actions that Mr. Williams has undertaken in the short time since taking over WMMB and WEYI last year. His actions in Myrtle Beach and in Flint clearly show that those transactions were in the public interest and are strong evidence of Mr. Williams' independence as the programmer of stations that HSH owns, as well as his commitment to local broadcasting and to how he would serve the community in Charleston, Harrisburg and Birmingham if the Commission approves the transactions proposed in this letter.

1. HSH has increased the public affairs and local programming at WMMB by adding a local public affairs program that airs in prime time on Sundays at 10PM. Mr. Williams is the host and the executive producer of this program, which is locally produced in Conway, South Carolina.

2. HSH has increased the coverage of local events, people and leaders through his guests on his local public affairs programs on WMMB.

3. HSH has produced and will be airing four public affairs shows on WEYI hosted by Mr. Williams. Topics include: Right to Work, Small Business & Economic Development and Reducing Crime. Guests are leaders in the Flint community.

4. Mr. Williams holds and hosts town hall meetings that are televised on WMMB in prime time, preempting network programming based on Mr. William's belief that such town hall meetings are of greater local importance. These town halls have covered topics of local interest such as health care and domestic violence. There is an upcoming town hall scheduled for May 13 on gun violence.

5. Upon purchase of the stations, Mr. Williams immediately became engaged in other programming decisions and was instrumental in securing *The Steve Harvey Show* and renewing *Queen Latifah* for fall 2013 on WMMB.

6. HSH's television ownership has increased the diversity of voices in the Florence and Saginaw markets.

7. Mr. Williams has been active in identifying minority employees and immediately engaged in an internship program specifically targeted at young minority students interested in the technical side of the television business.

Attached for the Commission's information is a power point showing some of the local programming Mr. Williams has already added to WMMB and WEYI, as well as a schedule of upcoming local programming. Prior to HSH's acquisition of these stations, there was no similar local programming addressing these issues.

HSH notes that this proposal is still subject to STG's agreement and comfort that it will not delay the proposed transactions beyond the termination date of the Allbritton Transaction. As stated earlier, Mr. Williams understands that unless STG can quickly get certainty as to the grant of the waiver request and the likelihood that the proposed transactions will comply with the public notice, it will be unlikely to be able to move forward with any transaction with HSH or Mr. Williams. HSH also realizes that this proposal is subject to review of the final terms of any relevant agreements, but submits that the proposed agreements for WABM and WLYH, will be substantially similar to the agreements already on file with respect to WMMP.

Based on the foregoing, HSH believes that a waiver of the Commission's JSA attribution rules to enable him to acquire these stations will promote the Commission's goals of serving the public interest in diversity and local programming. To keep things proceeding in a timely

manner HSH would appreciate receiving a response to this letter at the earliest possible time confirming the likelihood of the grant of a waiver and the proposed transactions compliance with the processing guidelines found in the Commission's March 12, 2014 Public Notice.

If you have any questions or would like additional information, please do not hesitate to contact me.

Respectfully Submitted,

HOWARD STIRK HOLDINGS, LLC

By: _____
Colby M. May
Its Attorney

xc: Commissioner Tom Wheeler, Chairman*
Commissioner Mignon Clyburn*
Commissioner Jessica Rosenworcel*
Commissioner Ajit Pai*
Commissioner Michael O'Rielly*
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David Honig, Esq.**
Clifford M. Harrington, Esq.**
Raymie Humbert*
ECFS, MB Docket 13-203

*By electronic mail only
**By electronic and First Class U.S. Mail

HOWARD STIRK HOLDINGS PROGRAMMING

November 2013 to January 2015

TV TAPINGS

December 27, 2013 WWMB Studio Conway, SC

Topic: The Wonders of Our Youth
Guest: Logan Taylor (11 years)
Olivia Nolan (11 years)
Calvin Mullins Jr. (13 years)
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Topic: Ecumenical Discussion
Guest: Rabbi Doron Aizenman, Chadbad of
Myrtle Beach
****
Topic: Your Community in Action (Part I and Part II)
Guest: Jack Scoville, Mayor, City of Georgetown
Guest: Stephen Wukela, Mayor, City of Florence
Guest: Lovith Anderson, Mayor, City of Lake City
****
*****
Topic: Law Enforcement in your Community
Guest: Phillip Thompson, Sheriff, Horry County
Guest: A. Lane Cribb, Sheriff, Georgetown County
Guest: J. Wayne Byrd, Sheriff, Darlington County

TV TAPINGS

January 20, 2014, WWMB TV Studio Conway, SC

Topic: Affordable Healthcare
Guest: Rev. Alexander Terry
Guest: Rep. Phillip Lowe, SC State
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Topic: Affordable Healthcare
Guest: SAME GUEST
****
Topic: Victory over Violence Part I and Part II
Guest: Rev. Tim McCray, CEO/Founder Joshua Academy
Guest: Bennie Swans, Community Activist
Guest: Lori Chappelle, Director
Waccamaw Center for Mental Health, Child/Adolescent
Programs
Guest: Dr. Tom Reid, Chairman, Carolina Human Reinvestment
Georgetown and Horry Counties
****
Topic: Obamacare
Guest: Rev. Terry Alexander, Mayor Lovith Anderson, Congressman
Tom Rice, Dave Schwartz

TV TAPINGS

March 26, 2014, WEYI TV Studio Flint, MI

Topic: Right to Work
Guest: Jarrett Skorup, Mackinac Center for Public Policy
Guest: Jim Johnson, Northwood University Political Science Professor

Topic Small Business & Economic Development
Guest: Tim Herman, Flint and Genesee Chamber of Commerce CEO
Guest: Bob Van Deventer, Saginaw County Chamber of Commerce

Topic: Reducing Crime – Part 1: Enforcement Efforts
Guest: Capt. T.P. Johnson, Flint Police Department
Guest: Lt. Brian Cole, Michigan State Police
Guest: John Potbury, Special Assistant Prosecuting Attorney

Topic: Reducing Crime – Part 2: Prevention Efforts
Guest: Wantwas Davis, Flint City Councilmember
Reta Stanley, CEO, Big Brothers/Sisters of Greater Flint

TOWN HALL MEETINGS

January 20, 2014, Horry George Town Technical College, Conway, SC

TOPIC: AFFORDABLE HEALTH CARE

Moderator:

Armstrong Williams

Broadcast:

WPDE TV

Panel:

Congressman Tom Rice

Dave Swartz, State Director of AFP

Lovith Anderson Jr., Mayor of Lake City

Pastor Terry Alexander, Senior Career Development Specialist with the South Carolina Occupational Informational System (SCOIS)

FUTURE
TOWN HALL MEETINGS AND TAPINGS

May 13, 2014, Horry George Town Technical College, Myrtle Beach, SC
TOPIC: STAND YOUR GROUND-MINORITY YOUTH AND VIOLENCE
Panelists - TBD

September, October, November
Congressional Black Caucus (CBC) Prime Time Special
Congressman Gregory Meeks

December 28, 2014
A Year in Review

January 11, 2015
Prime Time Special "Entrepreneurship" The Engine of our US Economy

TOWN HALL MEETINGS

March 28, 2014, Horry-Georgetown Technical College, Conway, SC

TOPIC: DOMESTIC VIOLENCE
Moderator: Armstrong Williams

Panelists:

The Honorable Alan Wilson, SC Attorney General
Laura Slade Hudson, Executive Director, SC Crime Victims' Council
Nina Easton, Senior Editor and Columnist, Fortune Magazine
Bishop Michael Goings, Pastor, Outreach Family Fellowship
Beverly Kennedy, co-Executive Director, Family Justice Center of Georgetown
Vicki Bourus, co-Executive Director, Family Justice Center of Georgetown
Saundra Rhodes, Horry County Police Chief
Vicki Hawkins, DV Victim