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April 16, 2014

VIA HAND DELIVERY AND ELECTRONIC MAIL

Accepted/Filed

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

APR 16 2014

FCC Office of the Secretary

RE: MB Docket 13-203, Applications Seeking Consent to Transfer Control of License Subsidiaries of Allbritton Communications Company to Sinclair Television Group, Inc. and Applications Seeking Consent to Assignment of Broadcast Station Licenses from Sinclair Television Group, Inc. to Deerfield Media (Birmingham) Licensee, LLC, Deerfield Media (Harrisburg) Licensee, LLC, and HSH Charleston (WMMP) Licensee

Dear Ms. Dortch:

This letter is being submitted on behalf of Howard Stirk Holdings, LLC ("HSH"), and provides a brief response to the April 14, 2014 letter filed by Free Press ("FP") regarding HSH's proposal for a waiver of the JSA attribution rules in order to acquire certain television stations in connection with the Sinclair Television Group, Inc.'s ("STG") acquisition of the Allbritton Television Group ("Allbritton Transaction").

In support of its request HSH focused on its record as a broadcaster providing unique local public interest and public affairs programming. It also noted the long and accomplished record of its sole owner, Armstrong Williams, an African-American who has developed and produced informative and issue focused content for media for nearly thirty years. HSH believes this level of accomplishment and service meets the public interest standards to qualify for a waiver.

Ignoring this, FP instead argues, while redacting its calculations, that "the bottom line income for HSH's WMMP . . . [would only] reap [] miniscule [sic] profits," as if "huge" profits were the standard for waiver, rather than serving the public interest and advancing ownership diversity. No misdirection by FP, however, will alter the fact that HSH and Mr. Williams have records of public service and program control at WMMP(TV), Myrtle Beach, SC and WEYI-TV, Flint Michigan, that properly support a waiver in the public interest here. It is also true that Armstrong Williams is one of a very small number (believed to be under four) of African American television broadcast station owners today, and allowing HSH to acquire stations as

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part of the Allbritton Transaction manifestly advances minority ownership and diversity, a much stronger and more appropriate metric supporting waiver.

Based on the foregoing, and the information and material included in its original filing, HSH continues to believe that a waiver of the Commission's JSA attribution rules to enable him to acquire WMMP(TV), Charleston, SC, WLYH-TV, Lancaster, PA and WABM(TV), Birmingham, AL will promote the Commission's goals of serving the public interest in diversity and local programming.

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

Respectfully Submitted,

HOWARD TIRK HOLDINGS, LLC

By: 

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*By electronic mail only

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

***By electronic mail only at the request of Mr. Humbert