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COLBY M. MAY, ESQ., P.C.

ATTORNEY AT LAW
205 THIRD STREET, S.E.
P. O. BOX 15473
WASHINGTON, D.C. 20003
(202) 544-5171

COLBY M. MAY◇

Of Counsel:
RICHARD G. GAY*

◇Also Admitted in VA
*Also Admitted in OH, WV

TELECOPIER NO.
(202) 544-5172

WRITER'S E-MAIL ADDRESS:
cmmay@maylawoffices.com

May 9, 2014

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FCC Office of the Secretary

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

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***

FCC File Nos: BALCDT-20130809ADG, WMMP(TV), Charleston, SC
BALCDT-20130809ADE, WABM(TV), Birmingham, AL

Dear Ms. Dortch:

Howard Stirk Holdings, LLC ("HSH") hereby updates and amends its pending April 22, 2014 waiver request of the joint sales attribution rules adopted in *Further Notice of Proposed Rulemaking and Report and Order* released on April 15, 2014 ("Report and Order"). Specifically, it is deleting inclusion of WLYH-TV, Lancaster, PA as one of the stations it proposed to acquire pursuant to its waiver request. HSH is maintaining its requested waiver as it concerns WMMP(TV), Charleston, SC, and WABM(TV), Birmingham, AL. HSH has terminated the exercise of its option to acquire WLYH-TV, owned by Nexstar Broadcasting, Inc.

In addition, HSH confirms its understanding of the Sinclair Television Group's ("STG") April 24, 2014 filing in this matter which "confirm[ed]" that if the Commission will waive the application of the JSA ownership attribution rules and allow HSH to acquire WMMP and WABM, STG would "be willing to sell WMMP and WABM to HSH." Moreover, to the extent the Commission is concerned that it may lack the authority to give assurances that it will waive the JSA ownership attribution rule as requested in the absence of a pending application, HSH emphasizes that the WMMP assignment application (BALCDT 20130809ADG) is on file and is ripe for determination. HSH respectfully believes the Commission has the record to grant the

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pending application to assign the license of WMMP(TV), Charleston, SC from an affiliate of STG to HSH. Such a grant would also allow HSH and STG to expeditiously proceed concerning WABM(TV), Birmingham, AL.

For the foregoing reasons, and as noted in its April 22, 2014 filing, HSH believes a waiver of the Commission's JSA ownership attribution rules as requested, and approval of the proposed transactions in accordance with the processing guidelines set forth in the Commission's March 12, 2014 Public Notice, will promote the Commission's goals of serving the public interest in competition, diversity and local programming, and advances the public interest, convenience and necessity.

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

Respectfully submitted,

HOWARD STARK HOLDINGS, LLC

By: _____
Colby M. May
Its Attorney

CMM:gmc
enclosures
xc: Barbara A. Kreisman, Esq., Chief, Video Division*
Adonis E. Hoffman, Esq., Chief of Staff, Office of Commissioner Clyburn*
William Lake, Esq.*
David Brown, Esq.*
Jerry Fritz, Esq.**
John Feore, Esq.**
Eric Greenberg, Esq.**
Miles S. Mason, Esq.**
Barbara Esbin, Esq.**
Matthew F. Wood, Esq.**
David Honig, Esq.**
Clifford M. Harrington, Esq.**
Raymie Humbert***
ECFS, MB Docket 13-203
***By electronic mail only**
****By electronic and Fist Class U.S. Mail**
*****By electronic mail only at the request of Mr. Humbert**