



**Minority Media &
Telecom Council**

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Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: File Nos. BALCDT-20140605ADO; BALCDT-20140605ADW

To the Commission:

For the reasons set forth in comments submitted by the National Association of Black Owned Broadcasters (NABOB),¹ the Minority Media and Telecommunications Council (MMTC) supports the attribution rule waiver request for the Marshall-Nexstar proposed joint sales agreement (JSA).

MMTC supports this waiver to allow Marshall an opportunity to develop into a free-standing station especially given that Nexstar does not have the option to acquire the station from Marshall. The specific facts of this case, particularly the fact that Nexstar will not be acquiring the station or the tangible assets of the station, provide the Commission with an opportunity to establish guidelines to inform parties seeking future waivers of the rule.

MMTC agrees that critical question for these waivers should be: “Is this transaction designed to produce a free-standing, independent broadcast operation at the conclusion of the JSA agreement?”² The Commission should look to evidence presented in waiver request to help answer this question and require periodic progress reports, if the waiver is granted.³

¹ See Comments of the National Association of Black Owned Broadcasters, Inc., File Nos. BALCDT-20140605ADO, BALCDT-20140605ADW (Jun 18, 2014).

² *Id.* at 5.

³ See *id.* at 5-6 (asking additional questions to determine whether the end goal of the transaction is to produce an independent station).

Respectfully submitted,

David Honig

David Honig
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