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April 20, 2011

Via UPS and Email

Received & Inspected

APR 22 2011

FCC Mail Room

Ms. Joyce L. Bernstein
Federal Communications Commission
Video Division -Media Bureau
445 12th Street, S.W.
Washington, DC 20554

Re: KTVV-LP, Hot Springs, Arkansas
Facility ID No. 57547

Dear Ms. Bernstein:

My client, Hallmark National Mortgage Corporation ("Hallmark") is in receipt of a letter dated March 24, 2011 from the Federal Communications Commission ("FCC"). According to the letter, Hallmark failed to make the quarterly Children's Television Programming Report ("Children's Report") filings for the fourth quarter of 2009 and all of 2010.

The letter states that "beginning on the date of its application for a Class A license and thereafter, the CBPA requires that a station must be "in compliance with the Commission's operating rules for full power television stations.'" The letter references 47 U.S.C. § 336(f)(2)(A)(ii). KTVV-LP is currently licensed on channel 63 and as such is outside the core channels and is not currently Class A. On October 1, 2010 KTVV-LP went dark due to their inability to renegotiate a tower lease. Subsequently KTVV-LP has filed an application for a digital permit on a core channel. Therefore, KTVV-LP did not fall under this particular code and no Children's Report filings are currently necessary.

A Class A eligible station does not have to begin performing the full service broadcast station requirements until "the date of its application for Class A License, . . ." Par. 6 of the Memorandum Opinion and Order on Reconsideration MM Docket No. 00-10 Slip Opinion Released April 13, 2001. However, due to the timing of this letter, in an abundance of caution, KTVV-LP did file a Children's Report for the first quarter of 2011.

Although Hallmark does not believe that there was any "failure" on their part to make the filings with the FCC, should the FCC find that KTVV-LP was required to file quarterly Children's Reports

during these periods, please consider this letter as a request to the change the status of KTVV-LP to low power television.

Please feel free to call me with any questions.

Sincerely,



Lori Withrow

Cc: Joyce Bernstein (joyce.bernstein@fcc.gov)