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December 18, 2020

VIA E-MAIL

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554
Attn: David Brown, Media Bureau

Re: Assignment of License Application (FCC File No. BALCDT-20201020AAW)
KLCW-TV, Wolfforth, Texas (Facility ID No. 77719)
Request For Confidential Treatment – Confidential Attachment

Dear Ms. Dortch:

Gray Television Licensee, LLC (“Gray”), by its attorney and pursuant to Section 0.459 of the Commission’s rules,¹ hereby requests confidential treatment of audience share and revised financial data submitted in connection with the above-referenced assignment of license application. More specifically, Gray has requested consent to the assignment of license of KLCW-TV, Wolfforth, Texas (the “Station”) from Ramar Communications, Inc. (“Ramar”) to Gray. In the request for waiver submitted with the assignment of license application and attached hereto, Gray demonstrates that common ownership of the Station with KCBD(DT), Lubbock, Texas satisfies the Commission’s waiver standards and greatly enhances the public interest. Gray’s showing in the amended application includes confidential ratings and revised financial data that in some cases Gray is prohibited from making public and in all events does not share with the public. For the reasons described below, the Commission should grant confidential treatment for this data.

Gray requests confidential treatment for this information because it includes highly sensitive commercial information regarding the audience share data for the Lubbock market stations and financial information of KLCW-TV that Gray does not under any circumstances make public. Gray is flatly prohibited by contract from making the audience share data information public. The revised financial data is information that Gray received from Ramar. Both Ramar and Gray consider the revised financial data highly confidential and would never disclose it publicly. As a consequence, this information qualifies for exemption from disclosure under Section 0.457(d) of the Commission’s rules, which provides that trade secrets and other

¹ 47 C.F.R. § 0.459.

similarly sensitive commercial information will not be made available for public inspection.² Given its sensitive nature, this information falls squarely within Section 0.457(d) and should be exempt from disclosure and afforded confidential treatment under Exemption 4 of the Freedom of Information Act.

Please contact me should questions arise with respect to this request.

Very truly yours,

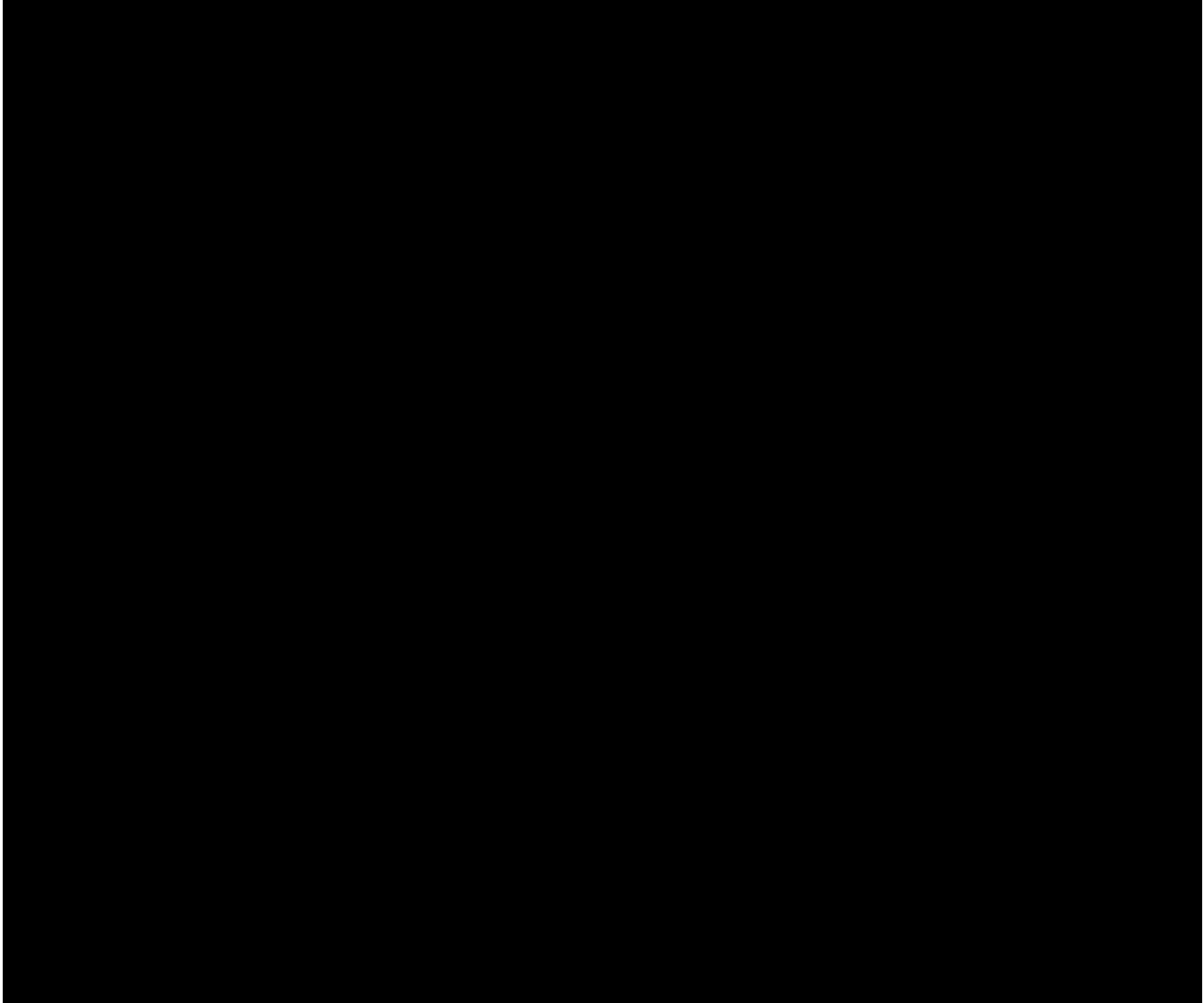
/s/ Henry H. Wendel
Henry H. Wendel
Counsel for Gray Television Licensee, LLC

Enclosures

² 47 C.F.R. § 0.457(d).

Amendment to Exhibit 18

At the informal request of Commission Staff, Ramar Communications, Inc. ("Ramar") hereby submits the following explanation concerning its calculation of revenues and expenses in the pro forma financial statement ("Pro Forma") submitted for KLCW-TV ("KLCW") as part of the Exhibit 18 failing station waiver request included in BALCDT- 20201020AAW.



Revised Financial Statement

[Redacted in its entirety]