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April 22, 2013

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APR 22 2013

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, DC 20554

Federal Communications Commission Office of the Secretary

Re:

WNCE-CD, Glens Falls, NY (Facility ID No. 450)

Attention:

Peter Saharko, Attorney Advisor Video Division, Media Bureau

Dear Ms. Dortch:

cc:

On behalf of Northern Broadcasting Company, Inc., please find this response to the Video Division's letter of March 12, 2013, requesting completion of the online public inspection file and documentation of Class A compliance by WNCE-CD, Glens Falls, NY (Facility ID No. 450) (the "Station"). Extension of the response deadline until April 22, 2013, was timely requested for the Station and so this response is timely filed.

Should you have any questions, please contact the undersigned.

Regards,

Michelle A. McClure

Michelle a. Mca

Peter Tannenwald

Counsel to Northern Broadcasting Company, Inc.

Jesse H. Jackson (date stamped copy via email)

FLETCHER, HEALD & HILDRETH, P.L.C.

## NORTHERN BROADCASTING COMPANY, INC. 126 Glen Street Glens Falls, NY 121801-4431

April 19, 2013

Marlene H. Dortch, Secretary Federal Communications Commission 445-12<sup>th</sup> Street, S.W. Washington, DC 20554

Re:

WNCE-CD, Glens Falls, NY (Facility ID No. 450)

Attention:

Peter Saharko, Attorney Advisor Video Division, Media Bureau

Dear Ms. Dortch:

This is to respond to the Video Division's letter of March 12, 2013, requesting completion of the online public inspection file and documentation of Class A compliance by WNCE-CD, Glens Falls, NY, Facility ID No. 450 (the "Station"). Extension of the response deadline until April 22, 2013, was timely requested for the Station and so this response is timely filed.

The March 12, 2013, letter required Northern Broadcasting Company, Inc. to upload the Station's main studio address to its online public file which has been completed. Additionally, it was directed to upload all missing issues/programs lists for the Station. The Station timely prepared its issues/programs lists and placed copies of those lists in the Station's paper public file and has now uploaded the issues/programs lists for the Station.

The Station's main studio address has been added to the online public file. Additionally, certificates demonstrating compliance of the Station with the Class A requirements through the Station's current license term have now been uploaded to the online public files. It is noted that the Commission's rules do not require a specific form or date that such showing must be provided. As a matter of fact, the Commission's own Class A TV Broadcast Station Self-Inspection Checklist states in Section I, F, 47, that eligibility documents need only be retained for two years. However, Northern Broadcasting Company, Inc. certifies that the Station has complied with the Class A requirements during the period since the Station filed for Class A status but has only uploaded individual annual certificates for the current license term. The Station has never broadcast less than 18 hours a day other perhaps for a short period during the

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transition from analog to digital. We have always had 3 or more hours a week of local programming.

Northern Broadcasting Company, Inc. has attempted to ensure that the online public file is complete as to the current license term. However, the current licensee has responsibility only for the public since the long form transfer of control was granted on September 23, 20120 (B1CTVA-20100729AFK).

Northern Broadcasting Company, Inc. has also conducted a general review of its online public file relating to those documents that are to be automatically downloaded from the FCC's filing databases. The children's television report for the Station was incomplete. The Q1 2009 report was filed but a typo was present on the Facility ID Number for the station and so it was not automatically uploaded to the Station's online public file. The Q1 2009 report was re-filed correcting the typo and so it is now included in the online public file. The children's television reports for the current license term of the Stations are now complete and reflected in the online public file.

We are an active locally owned and owner-operated station, providing service that is not otherwise available from stations in the larger cities of the Albany-Troy-Schenectady market. We recently relocated and upgraded our main studio. Our signal is carried on local cable systems. We are an important part of our community and intend to remain so.

As stated in counsel's letter dated March 21, 2013, requesting an extension of time to respond to the March 12, 2013 letter. Northern Broadcasting Company, Inc. has no interest in relinquishing the Class A status of the Station and submits this letter as directed and under penalty of perjury.

Respectfully submitted.

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