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April 22, 2013

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APR 22 2013

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

Re:

KABH-CD, Bend, OR, Facility ID 167799
KKEI-CA, Portland, OR, Facility ID 71078
KORK-CA, Portland, OR, Facility ID 71079
KORS-CD, Portland, OR, Facility ID 71069
KORY-CD, Eugene, OR, Facility ID 71070
KOXI-CD, Camas, WA, OR, Facility ID 71074
KOXO-CA, Vancover, WA, Facility ID 71080

Attention:

Peter Saharko, Attorney Advisor Video Division, Media Bureau

Dear Ms. Dortch:

cc:

On behalf of WatchTV, Inc., please find this response to the Video Division's letters of March 12, 2013, requesting completion of the online public inspection file and documentation of Class A compliance by the above referenced stations. Extension of the response deadline until April 22, 2013, was timely requested for the above referenced stations and so this response is timely filed.

Should you have any questions, please contact the undersigned.

Regards,

Michelle A. McClure Peter Tannenwald

Counsel to WatchTV, Inc.

Gregory J. Herman (date stamped copy via email)

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

WATCHTV, INC. 855 Harbor Court Southlake, TX 76092

April 19, 2013

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

Re: KABH-CD, Bend, OR, Facility ID 167799

KKEI-CA, Portland, OR, Facility ID 71078 KORK-CA, Portland, OR, Facility ID 71079 KORS-CD, Portland, OR, Facility ID 71069 KORY-CD, Eugene, OR, Facility ID 71070 KOXI-CD, Camas, WA, OR, Facility ID 71074 KOXO-CA, Vancover, WA, Facility ID 71080

Attention:

Peter Saharko, Attorney Advisor Video Division, Media Bureau

Dear Ms. Dortch:

This is to respond to the Video Division's seven letters of March 12, 2013, requesting completion of the online public inspection file and documentation of Class A compliance by the above-listed Class A television stations (the "Stations"). Extension of the response deadline was timely requested until April 22, 2013, for the Stations and so this response is timely filed.

The March 12, 2013, letters required WatchTV, Inc. to upload the Stations' main studio address to each of its online public files which has been completed. Additionally, it was directed to upload all missing issues/programs lists for the Stations. Except for the following, the Stations all timely placed their issues/programs lists in appropriate paper public files on a quarterly basis over the years and have now uploaded the issues/programs lists to the online public files for the Stations. The exceptions are as follows: KABH-CD has not uploaded an issue/programs list for Q1 2011 as KABH-CD was silent at that time but has uploaded a

statement explaining this situation; KORY-CD has not uploaded an issue/programs list for Q1 2011 as KORY-CD was silent at that time but has also uploaded a statement explaining this situation.

The Stations' main studio addresses have been added to all the online public files of each of the Stations. Additionally, certificates demonstrating compliance of the Stations with the Class A requirements through the Stations' 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, WatchTV, Inc. certifies that the Stations have complied with the Class A requirements during the period since each of the Stations filed for Class A status but has only uploaded individual annual certificates for the current license term. We have a fully equipped and staffed main studio, we have always been on the air 18 or more hours a day except for periods when authority to remain silent was requested, and we have always had 3 hours of local programming a week.

WatchTV, 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 reports for the Stations were incomplete. The Q1 2008 report for KKEI-CA was filed but the filing receipt maintained by counsel shows the wrong quarter and so a corrected report has been re-filed. Likewise, the reports for 2009 and Q1 2008 for KOXO-CA were filed but the filing receipts show the wrong quarter and so corrected reports have been re-filed. The children's television reports for the current license term of the Stations are now complete and reflected in the online public file.

We note that some of the problems in automatic importation of documents into our online public files arose from a change of Facility ID numbers when Class A status was migrated from the original analog channel to the companion digital channel for KABH-CD. We have worked to get these problems corrected as best we can.

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

Respectfully submitted,

Gregory J. Herman

President