

December 4, 2013

*Via Hand Delivery*

Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: KASW(TV), Phoenix, Arizona  
Application for Assignment of License  
File No. BALCDT-20130619AFJ  
**Request for Confidential Treatment—Confidential Attachments**

Dear Ms. Dortch:

Sander Operating Co. II LLC d/b/a KTUK Television (“Sander”), by its attorneys and pursuant to Section 0.459 of the Commission’s rules,<sup>1</sup> hereby requests confidential treatment of the attached documents (the “Confidential Documents”) requested by the Commission’s staff and submitted as an amendment to the above-referenced application. For the reasons described below, the Commission should grant confidential treatment for these documents.

Sander requests confidential treatment for the Confidential Documents because they constitute sensitive commercial, financial, and competitive information regarding the proposed transaction and regarding financial arrangements that remain subject to negotiations. In addition, disclosure of the parties to and the recipient of the Confidential Documents would itself disclose confidential commercial information. As a matter of policy, Sander does not release information of this sort to the public and takes specific steps to maintain the security of contents and existence of the Confidential Documents within the company. Furthermore, the Commission’s applicable rules and policies do not require parties to disclose the Confidential Documents in transfer and assignment applications, either routinely or otherwise.

As a consequence, the Confidential Documents qualify for exemption from disclosure under Section 0.457(d) of the Commission’s rules, which provides that trade secrets and other similarly sensitive commercial information will not be made available for public inspection.<sup>2</sup> Given their sensitive nature, the Confidential Documents fall squarely within Section 0.457(d)

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<sup>1</sup> 47 C.F.R. § 0.459.

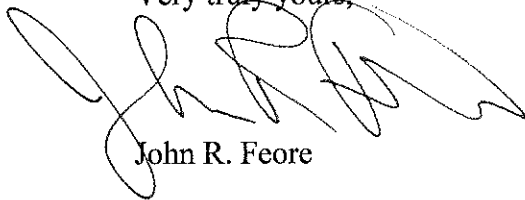
<sup>2</sup> 47 C.F.R. § 0.457(d).

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and should be exempt from disclosure and afforded confidential treatment under Exemption 4 of the Freedom of Information Act.

Please inform me if any questions should arise concerning this request.

Very truly yours,

A handwritten signature in black ink, appearing to read 'John R. Feore', is written over the typed name. The signature is stylized with a large initial 'J' and a long, sweeping horizontal stroke.

John R. Feore

[REDACTED]