



Robert J. Folliard  
T: +1 202 776 2357  
rfolliard@cooley.com

BY HAND DELIVERY

May 23, 2014

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

RE: WEEK-TV License, Inc.  
File No. BALCDT-20140221ABQ  
**Request for Confidential Treatment—Confidential Attachments**

Dear Ms. Dortch:

Granite Broadcasting Corporation (“Granite”), by its attorneys and pursuant to Section 0.459 of the rules of the Federal Communications Commission (“FCC” or “Commission”),<sup>1</sup> hereby requests confidential treatment of the attached documents (the “Confidential Documents”) requested informally by the FCC Media Bureau staff and submitted as an amendment to the above-referenced application. Granite is the 100% owner of WEEK-TV License, Inc., which is the licensee of WEEK-TV, Peoria, Illinois. For the reasons described below, the Commission should grant confidential treatment for these documents.

Granite requests confidential treatment for the Confidential Documents because they constitute sensitive commercial and competitive information regarding the stations that are the subject of the proposed transaction and because they contain information that is not otherwise available to the public. As a matter of policy, Granite does not release information of this sort to the public and takes specific steps to maintain the security of the 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 confidential commercial and financial 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) and should be exempt from disclosure and afforded confidential treatment under Exemption 4 of the Freedom of Information Act.

---

<sup>1</sup> 47 C.F.R. § 0.459.

<sup>2</sup> 47 C.F.R. § 0.457(d).



Marlene H. Dortch, Esq.  
May 23, 2014  
Page Two

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

Sincerely,

A handwritten signature in black ink, appearing to read "R. J. Folliard", written over a printed name.

Robert J. Folliard

Attachments

cc: David Brown (FCC)