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November 21, 2008

The Honorable John D. Dingell
Chairman
Committee on Energy and Commerce
House of Representatives
Washington, DC 20515-6116

The Honorable Edward J. Markey
Chairman
Subcommittee on Telecommunications and the Internet
Committee on Energy and Commerce
United States House of Representatives
Washington, DC 20515-6115

RE: NBC Universal, Inc. and NBC Telemundo License Co.
Digital Television Transition

Dear Congressman Dingell and Congressman Markey:

We write in response to your letter dated November 7, 2008, to Jeff Zucker, President and CEO of NBC Universal, Inc. The undersigned are responsible for the operations of the NBC and Telemundo Networks and the television stations that are commonly owned and operated with those networks. We appreciate your interest in the efforts that NBC Universal, Inc. and NBC Telemundo License Co. (collectively, "NBCU") are undertaking to educate consumers about the upcoming transition to full-power digital television and to prepare our stations for that transition. NBCU currently controls 26 full-power television broadcast stations, including 10 stations affiliated with the NBC Network, 15 stations affiliated with the Telemundo Network and one independent Spanish-language station (collectively, the "NBCU Stations").[1] All of the NBCU Stations are engaged in substantial ongoing efforts to publicize the coming digital transition.

During the past year, the NBCU Stations have aired many hours of news, public service announcements ("PSAs") and other broadcast content relating to the digital

[1] Please see the attachment for a complete list of these stations.

transition, which have been documented in quarterly filings with the FCC on Form 388. Among other outreach efforts, NBCU Stations are complying with current FCC requirements to air regularly scheduled digital television consumer education messages, including the following:

- an average of 16 30-second PSAs per week, including four per week from 6 p.m. through 11:35 p.m. ET/PT (5 p.m. through 10:35 p.m. CT/MT) ("Extended Prime");
- an average of 16 crawls, snipes or tickers ("CSTs") per week, including four during Extended Prime;
- a 30-minute educational program regarding the digital transition; and,
- beginning November 10, one 100-day digital television countdown graphic per day to remind the public of the exact timing of the transition.

The specific content of these PSAs, CSTs and long-form programming has evolved as the Stations have moved nearer to the transition deadline and consumers have gained a greater understanding of transition-related issues. As your correspondence highlights, several issues will become particularly important immediately prior to and following the termination of full-power analog broadcast service on February 17, 2009, and the concomitant changes in many stations' over-the-air channels or antenna locations. Specifically, NBCU understands that our education messages should remind consumers to: rescan their digital television reception equipment, be prepared to re-orient their television antennas, and be aware of potential shifts in over-the-air signal coverage.

Because these issues are likely to require consumer action immediately prior to or after the digital transition, NBCU Stations will address these matters in consumer education messages to be broadcast during January and February 2009. The specific educational messages to be conveyed to viewers during the first quarter of 2009 will include the following:

- Because local stations may be changing their over-the-air digital channel as of February 17, 2009, consumers who rely on over-the-air broadcasts should plan to rescan their digital-to-analog converter boxes or other digital television reception equipment on February 18, 2009, as well as any time a consumer discovers that he or she can no longer find a particular local station on a converter box or television receiver.
- Because some local stations' digital transmitters may not be in the same location as their analog transmitters, consumers may have to re-orient their antennas as of February 18, 2009. Consumers also may re-orient their home antennas prior to February 18, 2009, but should be aware that antenna re-orientation may affect

analog reception until the termination of full-power analog service on February 17, 2009.

- Because, in some cases, a station's digital over-the-air coverage area may not be identical to that same station's analog coverage area, households near the edge of a station's current broadcast service area may no longer be able to receive that station's over-the-air digital broadcasts without a better antenna or additional reception equipment. Consumers who rely on over-the-air broadcast service and are concerned about their access to digital over-the-air service should go to http://www.antennaweb.org/aw/welcome.aspx to determine what stations' digital broadcasts they are likely to be able to receive post-transition or contact the local station directly.

In part because of the useful findings from the early transition to digital by full-power television stations in Wilmington, North Carolina, NBCU also has become active in a series of soft-analog turnoff tests in a number of major television markets in which NBCU Stations are located. These tests simulate the loss of analog programming service that will occur on February 17, 2009, by replacing a station's analog programming with a billboard message that informs a viewer that he or she is receiving an analog broadcast signal and is not ready for the digital transition. The message encourages the viewer to contact a toll-free number or access the FCC's digital transition website for more information. Because these tests are more effective when coordinated among stations in a particular market, NBCU also has taken a leadership role in multiple television markets in which at least one of its 26 television stations is located. In conjunction with ION Media Networks' television stations, NBCU Stations are coordinating soft analog turnoff tests in the major television markets of San Francisco (October 21), New York (October 28), Chicago (November 12), Los Angeles (December 2), Washington, DC (December 2), Hartford (December 3), and Dallas-Fort Worth (on a date to be determined).

NBCU Stations also are participating in similar tests in other markets, including Philadelphia, which have been coordinated by state broadcaster associations or others. As a result of the tests performed thus far, thousands of consumers in these markets already have received assistance, including information regarding digital coupons and converter boxes. (As an example, in the recent tests in Chicago, more than 12,000 viewers contacted the toll-free help lines to obtain more information regarding the digital transition.) In addition, these tests enable stations to determine if there is any geographic area that appears to be significantly less prepared for the digital transition, which allows the stations to address such areas of need before the transition and may offer clues as to potential reception "gaps," such as those experienced during the early digital transition in Wilmington, North Carolina.

NBCU's two major broadcast networks are assisting their affiliates to prepare viewers for the digital transition. The NBC Television Network is providing a total of one minute of DTV consumer education PSAs per week, 25 percent of which air in the extended prime time

period defined by the FCC's DTV consumer education rules. The NBC Network has provided the necessary graphics capability for DTV education snipes and has expanded the use of the local news crawls in the *Today Show* so that affiliates can add a DTV consumer education message. Affiliates have access to a special section of nbcaffiliatemarketing.com where they can share creative elements and exchange ideas about consumer education with other NBC affiliates across the country. An additional section has been added that provides post-assessment, best practices and lessons learned from the completed digital transition in the Wilmington, North Carolina television market.

Similarly, the Telemundo Network is committed to educating its Spanish-speaking viewers about the digital transition. On February 17, 2008, the Telemundo Network launched its DTV consumer education campaign, entitled "Alerta Digital." On-air Telemundo personality Natalia Villaveces, who is the host and producer of "Nitido," Telemundo's weekend music and entertainment program, is the spokesperson for the campaign. In the third quarter of 2008, the Telemundo Network presented a segment addressing the digital transition on its newest morning show, *Levantate*, which airs Monday through Friday, 7:00 a.m.-9:00 a.m. The campaign also includes a dedicated page on the Telemundo web site (currently, www.yahootelemundo.com/AlertaDigital), which provides detailed information about the digital transition, including information about the converter-box coupon program and a section where consumers can post questions and obtain expert answers. Telemundo stations with websites also provide links to this site. The Telemundo Network is providing to all of its affiliates five 30-second DTV consumer education PSAs per day as part of the network programming, including one PSA in the extended prime time period defined by the FCC's DTV consumer education rules. One of these PSAs promotes the government's converter box coupon program and another addresses the various options available to consumers to ensure they continue to receive television service after the transition. Telemundo also is providing 16 DTV consumer education snipes per week, including four (25 percent) in extended prime time.

Many NBCU Stations also have addressed the coming digital transition within their local news or other local programming. For example, in September 2008, the NBC Network's East-Coast flagship station, WNBC, New York, hosted a New York town-hall DTV session, featuring FCC Commissioner Jonathan Adelstein, and also broadcast an interview with Commissioner Adelstein regarding the digital transition. Other NBCU Stations are working with other FCC commissioners during their visits to these Stations' markets to address the digital transition. NBCU Stations also have been able to respond directly to many viewer concerns or questions regarding the digital transition, either through comments to a Station's website, public information sessions, or one-on-one phone calls to Station technical personnel. Again, as an example, WNBC technical personnel have traveled to sessions throughout their local market to discuss the digital transition. NBCU expects that outreach efforts by individual NBCU Stations will continue as the transition draws closer.

Other NBCU consumer-education efforts are strengthened through coordination among one or more NBCU Networks and multiple NBCU Stations. For example, during September 2008, the Telemundo Network, with the support of multiple NBCU Stations, broadened its grassroots campaign promoting the DTV Transition and Alerta Digital. Materials and consumer information were distributed at grass roots events in nine different cities across the country. The materials distributed at these events included magnets, posters and T-shirts promoting the NTIA coupon program. These events celebrated the independence of various Latin American countries and attracted hundreds of thousand of people. In Los Angeles alone, Telemundo interacted with nearly 200,000 people.

With this background, NBCU is pleased to provide the following responses to your specific questions.

RESCANNING CONVERTER BOXES

What are your stations doing, or what, specifically, do they intend to do to let viewers, including viewers without ready access to the Internet, know that they need to rescan their digital-to-analog converter boxes after February 17, 2009?

As part of the February 2009 transition to digital, many stations may be changing to a new post-transition digital channel or moving their digital broadcasts back to their current analog channel as of February 17, 2009. Because a consumer's rescan of his or her converter box prior to the transition date may not correctly identify local stations' post-transition over-the-air channels, the NBCU Stations believe that the important issue of rescanning converter boxes should be addressed during the weeks immediately prior to the transition date of February 17, 2009.

Accordingly, NBCU Stations, which periodically have updated their 30-minute DTV consumer education program during the past year, intend to update this program again for the beginning of 2009. The updated version of the program to be aired by NBCU Stations prior to the digital transition in the first quarter of 2009 will directly address the need to rescan converter boxes and, in some cases, television sets, as of February 18, 2009. NBCU Stations also intend to highlight the importance of rescanning television equipment in other public-outreach material, including certain digital television consumer-education PSAs to be aired during the first quarter of 2009.

ANTENNA ISSUES

1. *If a viewer cannot receive certain local digital signals using a digital-to-analog converter box, how is that viewer supposed to determine that she needs to obtain a new antenna or adjust an existing antenna to correct the problem?*

NBCU agrees that it is important to address the issues some consumers may have receiving one or more digital signals because the consumer's television antenna is oriented toward a station's analog or former digital transmission facility rather than its post-transition digital facility. Viewers have at least three ways to obtain more information regarding whether they can or will be able to receive specific local digital signals using a converter box and an existing or new antenna:

1) A viewer with ready access to the Internet may access http://www.antennaweb.org/aw/welcome.aspx and enter his or her address to determine what over-the-air stations are likely to be received and what sort of antenna may be needed to receive particular stations post-transition;

2) A viewer may contact local stations directly, as many viewers have contacted NBCU Stations, and ask for more information; or

3) A viewer may call the FCC's call center through a toll-free phone number.

Based on current information and predictive analysis, NBCU currently projects that most of our viewers will not have significant post-transition antenna-orientation problems with respect to NBCU Stations. As part of the digital buildout, NBCU Stations have worked to eliminate or significantly reduce antenna-orientation issues by locating post-transition digital transmitters near their corresponding analog transmitters. Of the 26 NBCU Stations, many have co-located their digital and analog transmitters, and all but two are transmitting their analog and digital signals from towers within five miles of each other. Of those two, one Station already has constructed an on-channel booster facility that should address at least some antenna orientation issues that may be experienced by some viewers in that Station's market.

2. *What are your stations doing, or what, specifically, do they intend to do to let viewers, including viewers without ready access to the Internet, know that they may need to obtain a new antenna or adjust an existing antenna to receive over the air signals after February 17, 2009?*

Many stations may be changing to a new post-transition digital channel or moving their digital broadcast operations back to their current analog channels as of February 17, 2009. Because a consumer's re-orientation of his or her antenna prior to the transition date may not be consistent with his or her local stations' post-transition over-the-air channels,

the NBCU Stations recognize that the important issue of antenna type and antenna orientation should be addressed during the months prior to the transition date of February 17, 2009.

NBCU Stations, which periodically have modified their 30-minute DTV consumer education programs during the past year to address evolving issues, recently updated that program to address issues relating to the type of antenna needed for over-the-air digital reception. NBCU Stations also intend to update this program again for the beginning of 2009. The updated version of the program that is to be aired by NBCU Stations prior to the digital transition in the first quarter of 2009 will address the need to check and, potentially, re-orient household antennas as of February 18, 2009. NBCU Stations also intend to highlight the importance of antenna orientation in other public outreach materials, including certain digital television consumer-education PSAs to be aired during the first quarter of 2009. Finally, for those viewers who do have access to the Internet, many NBCU Stations address digital-transition antenna issues on their websites, and the Telemundo Network's website offers viewers expert responses to their questions. *See, e.g.*, http://www.nbcnewyork.com/station/digitaltv/; www.yahootelemundo.com/AlertaDigital.

SIGNAL CONTOUR ISSUES[2]

1. *How many of your stations have digital signal coverage areas that are smaller than their analog signal coverage areas? For those stations, please identify each station and its market and detail the amount of service coverage loss as a percentage of households in the station's current analog service area.*

Based on a recent internal analysis, eight of the 26 NBCU Stations expect some reduction in their total analog-service area. Of these stations, only five project a loss in total population to be served as of February 18, 2009:

[2] For all responses with respect to signal contour issues, analog service was determined using the Grade B (F(50,50)) contour based on a station's current analog authorization; digital service was determined using the noise-limited (F(50, 90)) contour based on a station's digital authorization that is currently constructed or to be constructed and operational as of February 18, 2009, using the appropriate adjustment for UHF dipole factor. Each analysis relied on the horizontal radiation patterns within the FCC database. In addition, because internal NBCU analysis can determine only total population, not television households, these numbers reflect population.

Station (Network)	Market	Projected Net Loss Population (%)
WNBC-DT (NBC)	New York, NY	3.2%
KNBC-DT (NBC)	Los Angeles, CA	N/A
KXAS-DT (NBC)	Dallas-Fort Worth, TX	3.1%
WNEU-DT (Telemundo)	Boston, MA	24.2%
WRC-DT (NBC)	Washington, DC	6.7%
WTVJ-DT (NBC)	Miami-Fort Lauderdale, FL	N/A
KHRR-DT (Telemundo)	Tucson, AZ	0.9%
WKAQ-DT (Telemundo)	Puerto Rico	N/A

Stations designated with "N/A" project to have a predicted loss in service area but no net loss in population served.

NBCU already has taken specific actions in many cases in which a net loss may be projected, although such predicted losses may vary from actual real-life reception patterns. For example, Television Station KHRR-DT ("KHRR") is projected to replicate its analog-reception area fully once the Station completes its FCC-approved phased transition by Summer 2009, which will expand the Station's current digital service area.[3] Television Station WNEU-DT ("WNEU") has a rebroadcast agreement with a Boston low-power station, WTMU-LP ("WTMU"), which already addresses analog reception concerns among Telemundo viewers in or near Boston. Because WNEU is assigned to Merrimack, New Hampshire, it actually provides only marginal over-the-air service to viewers in or near Boston, notwithstanding WNEU's predicted analog service to these viewers. Under this established agreement, WTMU will continue to provide identical Telemundo programming to many viewers within WNEU's projected digital loss area near Boston as of and after the February 17, 2009 transition. Television Station WNBC-DT, New York ("WNBC"), is projected to lose some analog-service area as a result of the destruction of the World Trade Center

[3] *See* FCC File No. BDSTA-20080618AAU. Because KHRR's post-transition digital facility is returning to its current analog channel, the KHRR's post-transition facility cannot be ready as of February 17, 2009, but is expected to be operational shortly thereafter. KHRR is preparing daily announcements regarding this phased transition, which are to commence no later than January 18, 2009.

and WNBC-DT's subsequent re-location to the Empire State Building. WNBC, along with the two other NBCU Stations projected to have a net service-area population loss (KXAS-DT, Fort Worth, Texas ("KXAS") and WRC-DT, Washington, DC ("WRC")), are investigating other means to improve long-term digital service, including a new service called digital television distributed-transmission systems that was approved by the FCC in an order released two weeks ago on November 7, 2008.

Consumers also will have other means to receive over-the-air NBC Network programming when WNBC, KXAS and WRC are required to terminate analog service in February 2009. During the early digital transition in Wilmington, only Wilmington stations converted to digital, and Wilmington viewers who had switched exclusively to digital reception thus were no longer able to view out-of-market stations that were still transmitting in analog and may not have fully built out their post-transition digital facilities or were not otherwise ready to serve viewers exclusively in digital. Accordingly, Wilmington's unique circumstances exacerbated any possible reception gaps caused by any incomplete replication of Wilmington stations' analog signals by their digital signals.

By contrast, in February 2009, all full-power stations, with only rare exceptions, will be required to be operating their post-transition digital facilities. As a result, other full-power stations carrying identical network programming are projected to serve many viewers in the projected loss areas noted above. Two examples are the loss areas currently predicted for WNBC and WRC, much of which are outside of these Stations' home markets and within the projected digital service areas of other NBC affiliates, including:

- WCAU-DT, Philadelphia, Pennsylvania, and WBRE-DT, Wilkes-Barre, Pennsylvania, collectively serve a substantial portion of WNBC's projected loss area in southern New Jersey and eastern Pennsylvania; and WVIT-DT, New Britain, Connecticut, is projected to serve a substantial portion of WNBC's projected loss area in southeastern Connecticut. (WCAU and WVIT also are NBCU-owned Stations, which will facilitate coordination among the Stations, if needed.)

- For WRC, NBC affiliate WBAL-DT, Baltimore, Maryland, is projected to serve much of the Station's predicted loss area to the north and east of Baltimore; NBC affiliate WHAG-DT, Hagerstown, Maryland, is projected to serve much of WRC's predicted loss areas in western Maryland and Virginia, and in West Virginia; and NBC affiliate WVIR-DT, Charlottesville, Virginia, is projected to serve much of the Station's predicted loss area in western Virginia. (None of these three stations are NBCU-owned Stations.)

NBCU Stations have substantial business reasons to explore every feasible means to expand their over-the-air digital service and are, as noted, continuing to investigate opportunities through which they can maximize their over-the-air digital coverage after February 17, 2009. At least on a temporary basis, however, NBCU Stations (and the NBCU-owned networks)

recognize that these over-the-air alternatives will offer an immediate option for viewers looking for over-the-air digital reception of NBC programming as of February 18, 2009.

2. *How many of your stations will have digital signal coverage areas that do not exactly replicate their analog service areas and will result in more than two percent of existing households not being able to receive the new digital signal? For those stations, please identify each station and its market and the amount of service coverage loss as a percentage of households in the station's current analog service area.*

Based on a recent internal analysis, four of the 26 NBCU Stations likely will not to be able to replicate their analog service areas as of February 18, 2009, with a resulting loss of more than two percent of existing analog households:

Station (Network)	Market	Projected Net Loss Population (%)
WNBC-DT (NBC)	New York, NY	3.2%
KXAS-DT (NBC)	Dallas-Fort Worth, TX	3.1%
WRC-DT (NBC)	Washington, DC	6.7%
WNEU-DT (Telemundo)	Boston, MA	25.0%

Please see NBCU's response to Question 1 for information regarding these Stations' plans to address digital over-the-air service.

3. *If a viewer cannot receive certain local digital signals using a digital-to-analog converter box, how is that viewer supposed to determine that this is because the station's digital signal contour is smaller or coverage in certain areas is weaker than its analog signal contour and coverage strength? In other words, how will the viewer know that she resides within the analog signal contour, but outside the digital signal contour?*

In general, viewers may be able to determine whether they will continue to receive digital over-the-air coverage through the means described in the response to Question 1 under Antenna Issues. In addition to these sources of information, NBCU Stations are taking specific additional measures to inform their viewers. First, as noted, NBCU Stations intend to air updated programming during January and February 2009 that informs viewers that some stations' digital over-the-air coverage may not match those stations' current analog-service areas. Second, each of the four NBCU Stations noted in response to Question 2, to the extent they have not been able to develop an over-the-air means to serve all projected replication-loss areas by January 2009, intends to broadcast specific and repeated

announcements that will identify areas currently projected to receive the Station's over-the-air analog service that may not receive the Station's over-the-air digital service.[4] These announcements, which are to begin no later than January 18, 2009, will specify which areas are predicted to lose reception and will inform viewers about further steps they may take to address their specific circumstances.[5] Third, for those viewers with ready access to the Internet, the relevant NBCU Stations that have a website will post similar information, including maps of the affected areas and contact information, on their websites.

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[4] Similarly, the Telemundo affiliate in Tucson, KHRR, will begin airing announcements no later than January 18, 2009, regarding its phased transition to digital, which will identify areas that may not immediately be able to receive KHRR as of February 18, 2009. As noted, any temporary loss in population, which will be less than two percent of KHRR's current analog population, should be remedied by Summer 2009 when the Station's digital over-the-air service is fully operational.

[5] Although specific details will vary by market, the information within the announcement will include details as to the date of the transition, the locations that may lose service, what means may be available to obtain the Station's or similar programming, and where a viewer may obtain more information. For example, WNEU expects to air a crawl several times per week that includes, in Spanish, the following information:

i) because WNEU must terminate analog broadcasts on February 17, 2008, all viewers who do not receive WNEU through cable or satellite services will need a digital-to-analog converter box or digital television equipment on February 18, 2009;

ii) viewers located more than 30 miles to the south of Nashua, New Hampshire, including in and near Boston, may need to install improved antenna equipment, consider cable or satellite service, or check if they can receive Telemundo programming from WTMU-LP, Boston; and

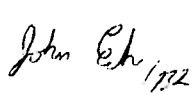
iii) viewers are encouraged to contact WNEU, WTMU, www.antennaweb.org, or your local electronics store for more information.

4. *What are your stations whose digital signal coverage areas are smaller than their analog signal coverage areas doing, or what, specifically, do they intend to do to let affected viewers, including affected viewers without ready access to the Internet, know that they should expect to lose a particular station's signal after the DTV transition because the station's digital signal contour is smaller than its analog signal contour?*

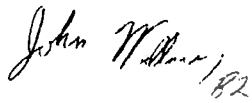
Please see NBCU's response to Question 3 above.

Thank you again for your interest. Please do not hesitate to contact Bob Okun, NBCU Vice President of Government Relations, directly if you would like further information.

Sincerely yours,



John Eck
President
NBC Network & Media Works



John Wallace
President
NBC Local Media

Donald Browne
President
Telemundo Network

cc: The Honorable Joe Barton, Ranking Member, Committee on Energy and Commerce
The Honorable Cliff Stearns, Ranking Member,
Subcommittee on Telecommunications and the Internet

ATTACHMENT
(List of NBCU Stations)

Station	Community of License	State
KTAZ	Phoenix	AZ
KHRR	Tucson	AZ
KVEA	Corona	CA
KNBC	Los Angeles	CA
KWHY-TV	Los Angeles	CA
KNSO	Merced	CA
KNSD	San Diego	CA
KNTV	San Jose	CA
KSTS	San Jose	CA
KDEN	Longmont	CO
WVIT	New Britain	CT
WRC-TV	Washington	DC
WSCV	Fort Lauderdale	FL
WTVJ	Miami	FL
WMAQ-TV	Chicago	IL
WSNS	Chicago	IL
WNEU	Merrimack	NH
KBLR	Paradise	NV
WNBC	New York	NY
WNJU	New York	NY
WCAU	Philadelphia	PA
WKAQ-TV	San Juan	PR
KXTX-TV	Dallas	TX
KXAS	Fort Worth	TX
KTMD	Galveston	TX
KVDA	San Antonio	TX