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November 14, 2008

The Honorable John D. Dingell
Chairman
Committee on Energy and Commerce
United States House of Representatives
Washington, D.C. 20515-6115

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

Dear Congressmen Dingell and Markey:

Transmitted herewith is the Response Of The FBC Television Affiliates Association (the "Response") to your November 7, 2008, letter (the "Letter") regarding certain digital transition television reception issues.

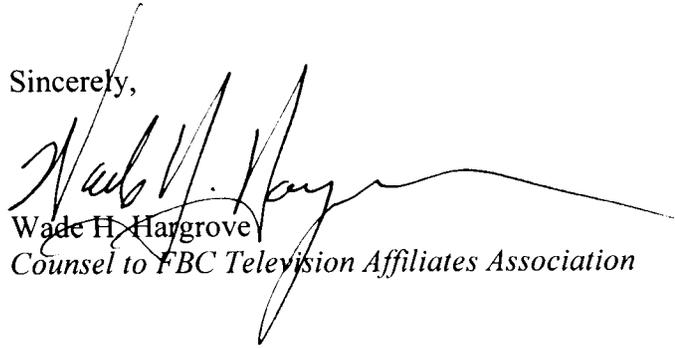
The Association is a non-profit trade association whose members consist of local television broadcast stations throughout the country that are affiliated with the Fox Television Network. The Association has no professional staff. Nevertheless, our firm, at the request of the Association, prepared the survey form attached as Exhibit 1. The form was sent by the Chair of the Association's Government Relations Committee to Fox Affiliates. Our firm received and has summarized the results of the survey as reflected in the enclosed Response.

The Honorable John D. Dingell
The Honorable Edward J. Markey
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Please let us know if we may be of further assistance in this important matter.

With kindest regards,

Sincerely,

A handwritten signature in black ink, appearing to read "Wade H. Hargrove", with a long horizontal flourish extending to the right.

Wade H. Hargrove
Counsel to FBC Television Affiliates Association

RESPONSE OF THE FBC TELEVISION AFFILIATES ASSOCIATION

I. Overview

It is apparent from survey responses that Fox Affiliates are acutely aware of, and are devoting considerable attention to, the reception issues addressed in the Letter. These stations are taking measures to inform viewers about specific reception issues as the transition date approaches and to provide assistance on a viewer-by-viewer basis. As one Fox Affiliate, KPTV, Portland, Oregon, summarized, "determination of the cause for loss of service could be difficult for the viewer to immediately ascertain. Actual signal failures can occur both inside and outside a station's predicted contour. Further, the failure may not necessarily be related to a weak signal. For example, the viewer may have no antenna hooked to the converter, or they may have the antenna oriented wrong." WGEM-TV, Quincy, Illinois, observed: "While there are many factors involved in reception issues, we would need to address each one on a case-by-case basis." Thus, Association members agree that viewer education by broadcasters is important to the transition, and stations also recognize that many of the reception issues that viewers will actually experience in the immediate wake of the transition cannot be addressed in advance.

Member stations report many forms of consumer education and coverage of a variety of transition-related issues. An example of a multi-prong, multi-topic approach is that of WCCB, Charlotte, North Carolina:

"In addition to fulfilling the requirements . . . of the FCC-mandated announcements and crawls, for a number of months the station has run a regularly recurring series in local news programs called *Digital Dude*. This series will continue up to and after the transition date. During the series, transition subjects such as rescanning converter boxes, replacing or readjusting antennas and experiencing the cliff effect [in] the outer limits of digital signal coverage areas are explained to viewers. Surrounding the time of its conversion, the station will run a phone bank leading up to and after the transition. Viewers can call and have a station representative walk the caller through a series of potential causes and how to determine which cause applies, whether or not the caller is calling concerning the station's signal."

Stations observe that neither they nor viewers will be able to predict or resolve all technical and operational issues prior to February 18. Nonetheless, numerous stations report that their participation in "soft" tests should better educate and prepare viewers to resolve the types of reception issues raised in the Letter.

Association members appear to be prepared to handle both anticipated and unanticipated post-transition reception issues on a "real-time" basis, with individualized attention. On this point, the report of member station WSFX-TV, Wilmington, North Carolina, is particularly insightful, as WSFX-TV was one of the stations that has already terminated its analog operations

as part of the Wilmington market's early transition. The station reports that reception issues were expressly covered in its *Guide to DTV Viewing in Wilmington* and in its education efforts. In addition, the station set up a 24/7 call-in line for 60 days following the switch to assist viewers having issues. It also hired an outreach person trained in set-top box setup to talk viewers through their converter box and antenna issues. The station describes its efforts as having been "very successful in addressing specific viewer issues." Similarly, numerous other Fox Affiliates report plans to use phone banks and call-in lines to address post-transition reception issues.

Various stations report that they plan to address post-transition reception issues through the use of multi-media campaigns to "get the word out" by means other than over-the-air promotion. By using other media, including the Internet and radio, stations anticipate that they will reach viewers experiencing reception problems and be able to instruct them to contact station staff and "hotlines" where individualized assistance will be available. For example, one Fox Affiliate, KDFX-CA, Indio/Palm Springs, California, reports that it has partnered with an FM radio station to provide bilingual English/Spanish transition-related information to the radio audience to more effectively reach native Spanish speakers in the market.

As member stations have noted, the broadcast industry is not the only source of information for viewers on these issues, and stations appear to recognize the importance of developing partnerships with other transition stakeholders to maximize the quality, quantity, and scope of transition education for viewers. For example, WXXV, Gulfport, Mississippi, reports that it plans to meet with local antenna and converter box merchants "to make sure they have the talking points necessary" to discuss reception issues with local consumers. Other stations specifically acknowledge the importance of consumer education provided by retailers and non-profit organizations to minimize consumer confusion relating to the transition.

Finally, member stations report that engineers and other station staff are visiting the homes of viewers to assist with converter box installation and reception-related problems experienced by viewers. While winter weather, expansive markets, and station staffing issues prevent some stations from providing these "house calls," numerous stations appear to be making this type of effort to provide individualized assistance.

* * * * *

II. The Questions

1. What are your association's member 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?

Numerous stations report that their consumer education efforts already address the issue of rescanning converter boxes. Other stations report their plans to emphasize the need for viewers to rescan in February 2009.

Numerous stations are addressing rescanning issues through public service announcements (“PSAs”), crawls, snipes, tickers, and news segments. A number of stations report that on-air segments concerning rescanning will be most effective in the final weeks of the transition. Many news segments covering converter boxes provide tips about installation, including how and when to rescan a converter box.

Stations are also making broadcast efforts that go beyond their own stations. For example, WXXV, Gulfport, Mississippi, has scheduled appearances on local radio talk shows to discuss DTV transition issues, including converter box rescanning.

A substantial number of stations report that heavily-promoted “soft” tests, especially those that include hotlines, question-and-answer feedback opportunities, and additional supporting news coverage, provide an effective education tool to inform viewers about rescanning. Similarly, community events appear to provide opportunities for many stations to give live presentations about converter boxes, including rescanning.

Numerous stations display educational website addresses such as www.DTV.gov and www.DTVAnswers.com, both of which contain sections devoted to converter box installation and rescanning. Stations also promote the digital transition sections of their own websites, where converter box information is provided and where viewers can link to other Internet resources for more converter box information.

Overall, it appears that stations are making substantial efforts to respond to telephone and e-mail inquiries from viewers. Many of these calls and e-mails are directed to individual stations, and market-wide “hot lines” are also being set up to facilitate assistance with converter box issues, including scanning and rescanning. Stations report that heavy promotion of these hot lines in newscasts and on the Internet will continue through the end of the transition and beyond.

2. 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?

Stations report that antenna adjustments may be necessary where stations are changing their transmission sites and that new antennas may be necessary—depending on a viewer’s current antenna—to pick up stations that are moving from a VHF channel to a UHF channel or vice versa. To facilitate viewers’ understanding of these issues, stations are giving over-the-air viewers the opportunity now to begin testing their antenna configurations to determine whether they are using the right type of antenna and whether the antenna is located and oriented in such a way as to receive on-air digital signals. Numerous Fox affiliates have reported that “soft” tests—especially those supported by phone banks and news coverage—provide opportunities for viewers to discuss with stations antenna-related reception issues in a simulated transition environment. A majority of member stations that responded to the Association’s survey report that they have already or plan to participate in a “soft” test.

Numerous stations responded to the Association’s survey by noting that the nature of antenna issues is such that these issues must be dealt with on an individualized basis and that

there is no one-size-fits-all approach that can resolve all antenna issues prospectively. The ability to address poor reception by adjusting an existing antenna or by purchasing a new antenna will be determined home-by-home because each case will depend upon the particular location of the home relative to transmitter sites and the home antenna currently in use. Stations appear to be preparing to help diagnose viewer antenna issues in “real-time” as viewers try to tune in their local digital stations.

Thus, many stations have reported to the Association that the most effective way for viewers to evaluate the source of antenna-related reception issues is for viewers to contact stations—on both an informal basis and during designated “phone bank” or “hotline” operations—so that individualized assistance may be provided. These individualized efforts extend beyond telephone and e-mail guidance and already include, for some stations, sending station staff to residences to provide “hands-on” assistance. For example:

- KJTV, Lubbock, Texas, recommends that viewers use the station’s toll-free phone number or e-mail station engineers for help with antenna issues.
- WUPW-TV, Toledo, Ohio, reports that viewers have been contacting the station by phone and e-mail and “we talk the viewer through the problem and provide as much support possible until the problem is resolved. This has already occurred on several occasions and antenna modifications corrected the problem. We will continue to endeavor to assist our viewers by phone, e-mail, or otherwise if they encounter signal loss or other difficulties with the transition.”
- WFTX, Fort Myers, Florida, plans to establish an “engineering help desk” during the transition week to respond to viewer questions about signal reception issues. The station reports that its engineers will work with individual callers to properly orient their existing antennas. According to WFTX, “if this does not resolve the issue, it may be that the caller will need to obtain a new antenna.”
- KVVU, Henderson, Nevada, recommends that viewers “ensure their antenna is of a type recommended by antennaweb.org and properly installed. Generally, indoor ‘rabbit ear’ antennas are not effective in fringe areas. Even attic mounted antennas may be ineffective due to signal attenuation caused by the type of construction used for the house. A call to the television station may prove helpful, which we are encouraging viewers to do.”
- KMSB, Tucson, Arizona, plans to “staff up during the week of the transition to answer viewer calls and help them troubleshoot their particular issue.”

In addition, some member stations have reported that they are educating viewers about antenna issues through various on-air efforts, which should ultimately prove helpful to viewers in evaluating and resolving antenna-related reception issues. For example:

- WFXL, Albany, Georgia, will air a five-part series “Transition Tech” to address various transition issues, including antenna issues.

- WFTX, Fort Myers, Florida, has aired “several news stories on this topic and will provide extensive coverage as we move closer to the transition date.”
- WFXP, Erie, Pennsylvania, suggests that viewers with reception issues discuss those issues with neighbors: “Since terrain (hills, valleys) significantly affects signal penetration, [viewers] should ask their neighbors who already have antennas if they are receiving the stations, or not, and what adjustments they made, or not, to get a signal.”
- As reported by WGEM-TV, Quincy, Illinois, “whether it’s using an existing antenna or upgrading to a newer antenna and coax cable, this has been a topic of our on-air education and public seminars and speaking engagements all year long. We also produced two 30-minute radio programs to address this issue and others related to the transition.” WGEM-TV has been encouraging consumers to e-mail or phone a specific, in-market antenna vendor and the station with antenna-related questions. In addition, the station has been airing monthly segments on radio stations to answer transition-related questions from viewers and listeners and provide antenna-related advice.

3. What are your association’s member 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?

Member stations report that they are engaged in a number of activities designed to educate consumers about transition-related antenna issues. A summary of these efforts is below.

Stations report the coordination of and participation in digital transition “tests,” which are designed to simulate February 18, 2009, so that viewers may evaluate their individual antenna needs. Because many of these tests include “hot lines” and extensive news coverage, they provide opportunities for stations to provide viewers with antenna-related information. For example, KXRM, Colorado Springs, Colorado, reports: “We are currently conducting soft tests in different dayparts monthly to encourage viewers to test all of their TV sets now to determine problems in reception and then to contact us.”

Community events appear to be a popular way for stations to make presentations about antenna issues. Some stations take antenna hardware to these events for a “hands-on” demonstration about antenna orientation. Some of these events are intended to reach a more general audience, while other events are held in partnership with senior citizen groups and other organizations that represent DTV transition “at-risk” populations. For example:

- KVVU, Henderson, Nevada, attends community events where the station “explains the need for an antenna, and how to position and orient it.”

- WLUK-TV, Green Bay, Wisconsin, has scheduled the “Antennas Direct tour bus” to be set up at Lambeau Field for the December 7 football game. (The capacity of Lambeau Field is over 70,000 people.)
- One broadcaster, who describes itself as “a leader in consumer education of over-the-air antennas,” reports that it has held monthly seminars and public education programs with a leading consumer antenna manufacturer to educate viewers about antenna-related transition issues.

Stations are using various on-air program segments, including newscasts, PSAs, crawls, snipes, tickers, and 30-minute programs to educate viewers about the potential need to re-aim, relocate, or replace their antennas. Stations are also promoting on-air the availability of certain websites, such as www.antennaweb.org and www.DTV.gov, which provide extensive antenna-related information. In addition, some stations are using their own websites to provide detailed information relating to transition-related antenna issues. For example, KJTV, Lubbock, TX, is “posting our DTV coverage pattern on our DTV Explained section on our web site along with a link to Antenna Web to help them determine how to select the best antenna.”

A significant number of stations report that they have been responding to and plan to continue to respond to telephone and e-mail inquiries from viewers about antenna issues. For example:

- KVVU, Henderson, Nevada, observes that “a call to the television station may prove helpful, which we are encouraging viewers to do.”
- KFQX, Grand Junction, Colorado, reports that its “engineering and management staff, including receptionist, are well versed and often provide phone consultation to callers” on antenna-related reception issues.

Finally, some stations are sending engineering staff to viewer homes to assist with antenna issues. For example, WICZ, Binghamton, New York, reports that its engineering department has installed antennas for viewers. Similarly, KVCT-TV, Victoria, Texas, reports that its engineers make “‘house calls’ to help viewers with their DTV issues. If the viewer needs assistance, we will go to their home and evaluate their needs.”

4. How many of your association’s member 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.

Only a few member stations report digital signal coverage areas that will be smaller than analog signal coverage areas. It is difficult to predict how many households will lose service from these stations, particularly for stations that have filed digital “maximization” applications (which, if granted, will result in larger signal coverage areas).

5. How many of your association's member 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. Please also indicate if such station will also gain households in its digital service area not currently reached by its analog service.

Only a few member stations report that their digital signal coverage areas differ from their analog signal coverage areas by an amount that is two percent or greater. As noted above, it is difficult to predict with great accuracy how many households will lose service from these stations, particularly for stations that have filed digital "maximization" applications (which, if granted, will result in larger signal coverage areas).

6. 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?

Stations appear to have recognized the complexity of signal loss issues and appear to be prepared to assist viewers who call stations for help in analyzing and understanding signal loss issues. In an effort to educate viewers about these issues, some stations are developing coverage maps to show their analog/digital coverage disparities. A few examples follow:

- KMSB, Tucson, Arizona, a station that does not anticipate losing viewers to an analog/digital coverage disparity plans nonetheless to air news stories to outline the areas outside the DMA that may not be able to receive the station's signal after the transition. The station reports that it plans to produce "extended news focusing on this and all other DTV transition topics. There will be phone banks for those with questions, and as always, the website will have detailed information for the viewer."
- KXLT-TV, Rochester, Minnesota, reports that it has prepared coverage maps to allow viewers to compare the station's current analog signal coverage and its digital signal coverage.
- WALA-TV, Mobile, Alabama, plans to post its contour map on its website to help instruct viewers about signal loss issues.
- KVVU, Henderson, Nevada, reports: "The television station's engineering staff has the station's coverage map that shows predicted coverage in the viewing area or access to software that can predict point-to-point reception to viewer's address. This would be an important step in determining whether the viewer is in an area predicted to receive the digital station. Additionally, station engineering

personnel are familiar with signal coverage and may know whether a viewer can practically receive the digital signal of the station based on previous experience.”

7. What are your association’s member 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?

Member station survey responses reveal that education efforts on this subject are primarily focused on the use of on-air material, including PSAs, crawls, snipes, tickers, and news stories, some of which include solicitations to call the station for assistance. As with other signal reception issues, stations report that one-on-one contact with viewers will be, in many cases, the most effective way to address the signal coverage issue because the risk of signal loss is directly related to the precise location of each viewer and the “real-world” reach (as opposed to the predicted contour) of each station’s signal. The following are representative examples of member station activities designed to address this important issue.

- WFXP, Erie, Pennsylvania, relates that it has undertaken the following efforts: “The station started broadcasting in full power digital on October 14, 2008. On that day we announced in news (on two stations, WFXP and sister station WJET) that the station went full power, and station promotional spots continue to promote that the station is full power digital. On October 17, the Chief Engineer and [General Manager] drove through several areas of our DMA with a digital TV and a power antenna, to see for ourselves the actual, if any, limitations to our full power digital signal. We wanted to ascertain, first hand, any challenges. The Chief Engineer and [General Manager] also made calls to friends in the DMA who have digital TV sets as part of our coverage ascertainment to discover any challenges they were having. We concluded that, based on these assessments, several thousand homes could now pick us up in digital versus analog in a different part of our DMA based on the physical configuration of our new digital broadcast antenna. Now we are in a better position to properly communicate signal coverage concerns with viewers. That being said, our news stories during the week of November 24 will note the geographical areas that likely gained a signal (vs. analog) and some who likely lost (vs. analog) with full power digital, and that viewers need to ascertain for themselves if they can get digital or not based in part on their topography (live in a valley, live on a hill, etc.) and geographical location.”
- WTLH-TV, Bainbridge, Georgia, reports that its post-transition digital coverage area was initially designed to be smaller than its analog coverage area, but the station has applied for a power increase to replicate the analog signal. In the meantime, “every single inquiry we receive at the station is personally answered by the GM, Chief Engineer, or Program Director as soon as we receive them. In

cases where viewers have major reception problems, WTLH-TV has sent engineers to viewers' homes."

- WXIX, Newport, Kentucky, reports: "Advertising campaigns will run prior to transition which will give viewers the station's phone number so they may call and receive assistance to determine the cause of their loss of signal. We will reach out to viewers prior to transition All information for website and phone numbers will be covered, via audio, video, and closed captioning during advertising and news coverage. Phone banks will be established to handle post transition reception calls."

* * *

Association Survey Form

Dingell/Markey Survey Questions:

Name: _____

Station Call Sign: _____ Network Affiliation: _____

Station City of License: _____ Station DMA: _____

Re-scanning Converter Boxes:

1. What is your station already doing and what does your station intend to do to let over-the-air viewers (including viewers without Internet access) know that they need to re-scan their converter boxes after February 17, 2009?

Over-the-air Antenna Issues:

2. What is your station already doing and what does your station intend to do to let over-the-air viewers (including viewers without Internet access) 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?

3. For over-the-air viewers who have a converter box but cannot receive certain local station signals over-the-air after February 17, how would you suggest that those viewers figure out whether they need to obtain a new over-the-air antenna or adjust an existing antenna to correct the problem?

Signal Contour Issues:

4. Is your station's post-transition digital signal coverage area smaller than its analog signal coverage area?

Yes No

5. If you checked "Yes" to Question 4, please identify the percentage of households in the station's current analog service area that are predicted not to receive your post-transition digital signal:

6. If you checked "Yes" to Question 4, what is your station already doing and what does your station intend to do to let over-the-air viewers (including viewers without Internet access) know that they should expect to lose over-the-air access to the station after February 17?

7. Whether your station's post-transition digital coverage area is smaller than your analog coverage area or merely different than your analog coverage area, will your station's post-transition digital signal coverage area result in a loss of service for more than 2 percent of households that are currently predicted to receive your analog signal?

Yes No

8. If you checked "Yes" to Question 7, please identify the percentage of households in the station's current analog service area that are predicted not to receive your post-transition digital signal:

9. If you checked "Yes" to Question 7, will your station gain households in its post-transition digital service area that are not currently served by your analog service?

Yes No

10. If an over-the-air viewer who resides inside a station's analog coverage area but outside the station's post-transition digital coverage area is unable to view the station's signal after February 17, 2009, how will that viewer be able to determine the cause of the loss of the signal? How will the viewer know that he or she resides within the analog contour but outside the post-transition digital contour?