

DEMONSTRATION OF COMPLIANCE WITH COMMUNITY OF LICENSE COVERAGE RULES

This application proposes a channel sharing arrangement between KTLN-TV, Novato, CA (Fac. ID 49153) and KAXT-CD, San Francisco, San Jose, CA (Fac. ID 37689), whereby KTLN-TV will broadcast using KAXT-CD's transmission facilities.

Under Section 73.625(a) of the Commission's Rules, a full power UHF television station's DTV transmitter must provide a 48 dBu contour over the station's entire principal community to be served. As demonstrated in the attached exhibit, KAXT-CD's 48 dBu contour does not cover KTLN-TV's principal community of Novato, California. However, in the Incentive Auction Report and Order, the Commission determined that proposed sharees "may propose licensed community changes if they cannot satisfy signal coverage requirements from their new transmitter sites, provided that the new communities meet the same allotment priorities as the current ones and are located in the same Designated Market Areas." *In the Matter of Expanding the Econ. & Innovation Opportunities of Spectrum Through Incentive Auctions*, Report & Order, 29 FCC Rcd. 6567 ¶¶ 27, 374-77 (2014). The Commission further stated that "[i]n the unlikely event that the sharee cannot identify any community that meets the same or a higher allotment priority at its new shared site, it must choose a new community of license to which it will provide the next highest priority." *Id.* ¶ 376 n. 1117.

Upon commencement of channel sharing, KTLN-TV proposes to change its community of license to Palo Alto, California. Palo Alto has "a [2010] U.S. Census population of [64,403] persons, its own local government, police and fire departments and educational institutions, as well as numerous religious institutions and businesses." *See In the Matter of Amendment of Section 73.622(l), Post-Transition Table of DTV Allotments*, 26 FCC Rcd. 32 (MB 2011). Palo Alto and Novato are both located in the San Francisco-Oakland-San Jose, California Designated Market Area. Moreover, as demonstrated in the attached exhibit, KAXT-CD's 48 dBu contour covers Palo Alto in its entirety.

Finally, Palo Alto meets the same allotment priority as Novato. The Commission's allotment priorities are to: (1) provide at least one television service to all parts of the country; (2) provide each community with at least one television broadcast station; (3) provide a choice of at least two television services to all parts of the country; (4) provide each community with at least two television broadcast stations; and (5) assign any remaining channels to communities based on population, geographic location, and the number of television services available to the community from stations located in other communities. *Amendment of Section 3.606 of the Commission's Rules and Regulations*, Sixth Report and Order, 41 FCC 148, 167 (1952). As demonstrated in the attached report from BIA/Kelsey, KTLN-TV currently provides a first local service to Novato, placing it in the allotment priority 2. With the proposed change, KTLN-TV would provide a first local service to Palo Alto, placing it in the same allotment priority. Accordingly, the proposed change is consistent with the Incentive Auction Rules and Section 307(b) of the Communications Act.

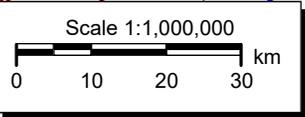
Prepared by Marsand, Inc.
for Ota Broadcasting (sfo), LLC

KAXT-CD CH42
San Francisco, San J, CA

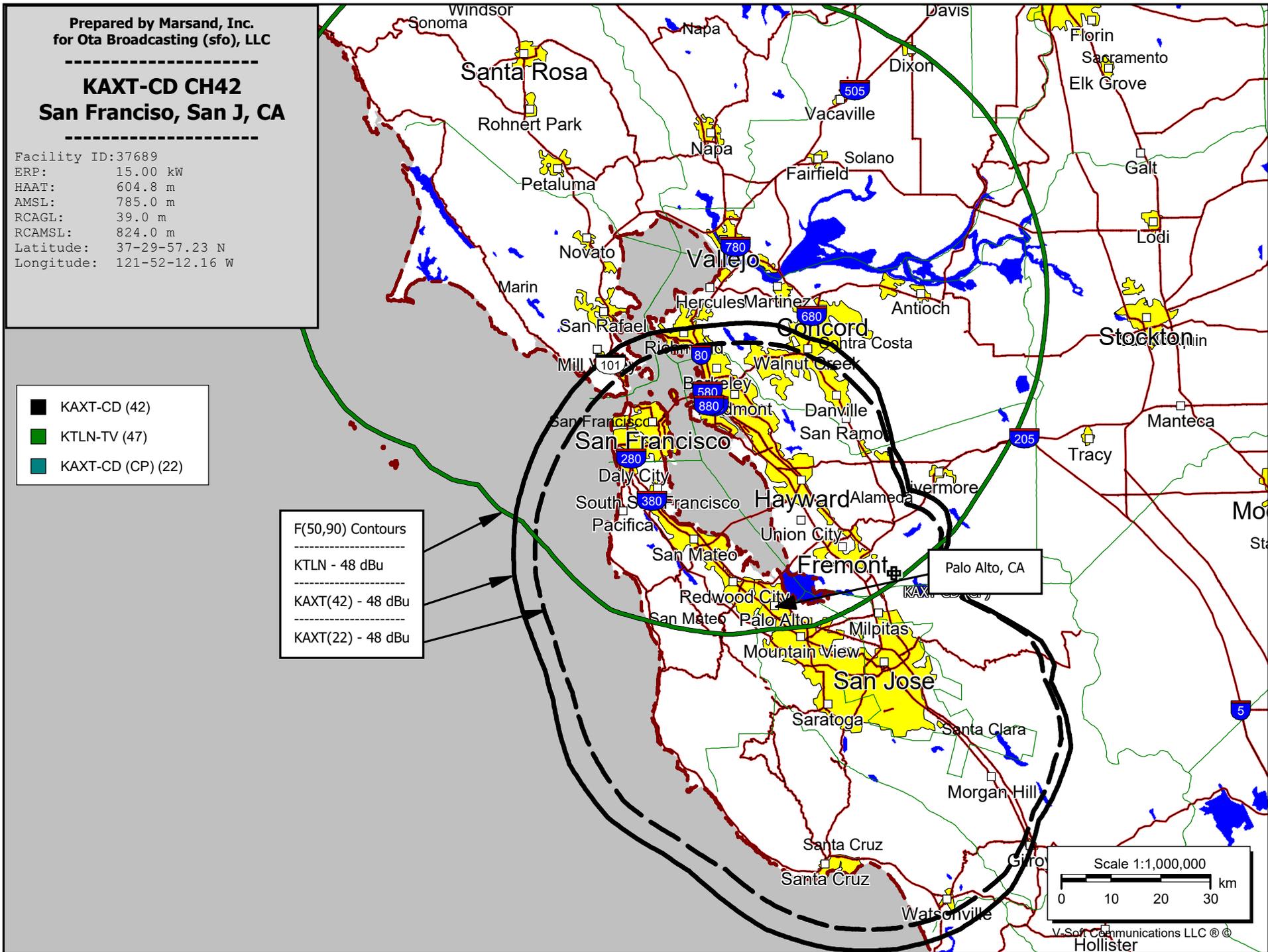
Facility ID: 37689
ERP: 15.00 kW
HAAT: 604.8 m
AMSL: 785.0 m
RCAGL: 39.0 m
RCAMSL: 824.0 m
Latitude: 37-29-57.23 N
Longitude: 121-52-12.16 W

- KAXT-CD (42)
- KTLN-TV (47)
- KAXT-CD (CP) (22)

- F(50,90) Contours
- KTLN - 48 dBu
 - KAXT(42) - 48 dBu
 - KAXT(22) - 48 dBu



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Community Facts - Find popular facts (population, income, etc.) and frequently requested data about your community.

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Palo Alto city, California

Population

Census 2010 Total Population ▾

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64,403

Source: 2010 Demographic Profile

Popular tables for this geography:

2010 Census

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2015 American Community Survey

- [Demographic and Housing Estimates \(Age, Sex, Race, Households and Housing, ...\)](#)

2016 Population Estimates Program

- [Annual Population Estimates](#)

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Calls	Affiliate	National Sales Rep	Type	City of License	State of License	ANALOG			DIGITAL			Estimated Station Rev '16 (000)	Power Ratio	Acquired	Price (000)	Price Code
						Ch	Power (kW)	Tower Height	Ch	Power (kW)	Tower Height					
KAXT-CD	INA		CL-A	San Francisco	CA				42.0	15	1,916'			2014/07	10,100	
CP									22.0	10						
KBCW	CW	TelRp	MAIN	San Francisco	CA				45.0	1,000	1,609'	14,500	1.37	2002/01		sw
CP									28.0	714	1,609'					
KCNS	SBN		MAIN	San Francisco	CA				39.0	1,000	1,679'	3,000	0.57	2011/05	15,000	
CP									39.0	1,000	1,683'					
KCNZ-CD	HSN		CL-A	San Francisco	CA				28.0	15	1,247'			2017/07	2,850	
CP									21.0	13	1,247'					
KCSM-TV	PUB	NPM	PUB	San Mateo	CA				43.0	500	1,678'			2017/10	12,000	
CP									27.0	363	1,678'					
KDTV-CD	UNI	UNI	CL-A	Santa Rosa	CA				28.0	4	2,697'			2007/03		g1
CP									21.0	3						
KDTV-DT	UNI	UNI	MAIN	San Francisco	CA				51.0	476	2,300'	32,500	1.03	2007/03		g1
CP									20.0	200	2,300'					
KEMO-TV	AZT		MAIN	Santa Rosa	CA				32.0	20	3,045'	1,700		2014/01		
KFSF-DT	UnM	UNI	MAIN	Vallejo	CA				34.0	370	1,634'	8,800	0.83	2007/03		g1
KGO-TV	ABC	ABC	MAIN	San Francisco	CA				7.0	24	1,703'	104,000	0.79	1996/02		g
CP									12.0	24	1,703'					
KICU-TV	IND	TelRp	MAIN	San Jose	CA				36.0	550	2,251'	14,500		2014/10		sw
KKPX-TV	ION	InHse	MAIN	San Jose	CA				41.0	1,000	1,371'	3,500	0.17	2008/01		g
CP									14.0	555	1,371'					
KMTP-TV	PUB		PUB	San Francisco	CA				33.0	480	1,696'					
KNTV	NBC	NBC	MAIN	San Jose	CA				12.0	103	1,236'	75,000	1.09	2011/01		g
CP									13.0	95	1,368'					
KOFY-TV	IND	KatzT	MAIN	San Francisco	CA				19.0	568	1,601'	9,300		2007/06		g
KPIX-TV	CBS	CBSTV	MAIN	San Francisco	CA				29.0	1,000	1,679'	103,000	1.03	2000/05		g
KQED	PBS	NPM	PUB	San Francisco	CA				30.0	1,000	1,679'					
KQEH	PBS	NPM	PUB	San Jose	CA				50.0	310	2,171'			2006/10		al
KRCB	PBS		PUB	Cotati	CA				23.0	105	2,068'					
CP									5.0	1	2,068'					
KRON-TV	My	TelRp	MAIN	San Francisco	CA				38.0	1,000	1,679'	25,725	0.81	2017/01	***,***	g
CP									7.0	23	1,679'					
KSTS	TEL		MAIN	San Jose	CA				49.0	257	2,257'	12,000	0.57	2011/01		g
CP									19.0	120	2,264'					
KTLN-TV	REL	InHse	MAIN	Novato	CA				47.0	1,000	1,319'	1,000		2011/10	8,000	
KTNC-TV	EST		MAIN	Concord	CA				63.0	47	3,091'	4,500	0.85	2013/07	13,500	
CP									39.0	1,000	1,683'					
KTSF	INA	Asian	MAIN	San Francisco	CA				27.0	858	1,324'	9,000				
KTVU	FOX	TelRp	MAIN	Oakland	CA				44.0	1,000	1,680'	100,000	1.18	2014/10		sw
CP									31.0	775	1,680'					



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Council Member



Eric Filseth
Council Member



Adrian Fine
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Karen Holman
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Liz Kniss
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COUNCIL SUMMER BREAK: The City Council will be on summer break from July 1, 2017 thru August 13, 2017.

MAYOR'S OFFICE HOURS: Second Wednesday of the month from 3:00 pm to 5:00 pm. Please contact the City Clerk's office at (650) 329-2571 to schedule an appointment.

The terms of the Mayor and Vice-Mayor are for one year and expire at the first meeting in January. The General Municipal Election is held on the first Tuesday after the first Monday in November, in even-numbered years. Council terms are for four years.

Regular Council meetings are held at 6:00 p.m. on the first three Mondays of each month. Meetings are cablecast live in most cases (and replayed) on Government Channel 26 or 29 and broadcast via KZSU Radio, 90.1 FM. Video streaming of Council meetings may be accessed at [MidPen Media Center](#). Call Community Media Center at 650-494-8886 for exact times of replays. See Tentative Council Agenda in the Palo Alto Weekly on the Fridays preceding the City Council meetings.

Email the City Council

The City Council appreciates hearing from citizens. Thank you in advance for your comments and concerns. Your email will be forwarded to all nine Council Members and a printed copy will be included in the next available Council packet.

Correspondence received before noon on Wednesday will be included in that week's Council packet. Any correspondence received after noon on Wednesday, relating to an item on the agenda, will be put at the Council Members' places at the next Council meeting.

When you email the City Council, your email becomes a [public record](#). You should not include any private information (such as your phone number, home address, or minor children's names) in your correspondence to Council.

If you wish to continue, [click here](#).

The City Council Adopted the [Form 806](#) on November 05, 2012 as required by the [Fair Political Practices Commission \(FPPC\)](#) for the purpose of reporting appointments of Council Members to stipend positions such as Mayor and Vice Mayor.

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Last Updated: Feb 27, 2017



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Emergency: 911 or 650-329-4433
 24-hour Dispatch Center (non-emergency): 650-329-2413
 Main Business Number (front desk): 650-329-2406 (Monday thru Friday, 8 a.m. to 4 p.m.)
 After Hours: Weekends: 650-329-2406

NOW HIRING



PALO ALTO POLICE DEPARTMENT
\$25,000 Hiring Incentive for Lateral Officers
\$10,000 Hiring Incentive for Academy Graduates

Interim Chief Ron Watson welcomes you to the Palo Alto Police Department's website, and encourages you to learn more about our programs and services!

The Palo Alto Police Department is committed to providing exceptional public safety services and taking a leadership role in building community partnerships. We subscribe to core values that include integrity, accountability, trust, teamwork, a positive attitude, and the professional, impartial treatment of all.

It is important for us to stay connected to our community. It is also important for us to inform you about what's going on in town, the work that we're doing, and how you can best work with us to make Palo Alto as

safe as we possibly can.

For the most up-to-date Department news, alerts, and advisories, please follow us on one of our many social media platforms: [Twitter](#), [Nextdoor](#), [Instagram](#), [Nixle](#), [Facebook](#), [YouTube](#), and [Flickr](#). We also have a free mobile smartphone app, which we encourage you to download for [iOS](#) or [Android](#) today!

We provide service to a resident population of approximately 68,955 (according to a 2014 U.S. Census Bureau estimate). Our daytime population increases to over 125,000, as the Stanford University campus and our thriving business community bring many more people to town.

For more information about the various units of the Palo Alto Police Department, [click here](#).

Last Updated: Sep 12, 2017

Police Announce New Recruiting Initiatives and Hiring Incentives

We are kicking off a major recruiting campaign this month to hire new police officers and public safety dispatchers, and to attract experienced officers from other agencies.

[\[more\]](#)



Information on PAPD Relationship with Federal Government on Immigration Matters

Based on recent events and inquiries from the Palo Alto community, the Palo Alto Police Department has put together the following information to explain the relationship between the Palo Alto Police Department and the federal government (specifically, Immigration & Customs Enforcement, or "ICE") on immigration matters.

[\[more\]](#)



We're Hiring!

We're actively hiring officers NOW! [Visit our Recruiting page](#) for info!

We are looking for men and women from all backgrounds who welcome a challenge, and who will uphold our mission statement, "To proudly protect and serve the public with respect and integrity." We offer great pay and benefits, ample opportunities for specialty assignments and advancement, outstanding training, and the privilege to serve the community of Palo Alto.



Can You Help Us Solve the 2001 Maria Hsiao Homicide? Watch This Video!

We need your help to solve a cold case homicide. Please watch this video and help us by sharing it on your social networks!

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Download Our Free Mobile App Today!

The Palo Alto Police Department has a free mobile app for smartphones that gives you immediate access to the latest news, crime maps, urgent alerts, and social media posts right from the palm of your hand!

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Are You Registered for Emergency Alerts?

AlertSCC is the system that all Santa Clara County public safety agencies use to deliver emergency notifications. Both the Palo Alto Police Department and the



Palo Alto Fire Department use this system to send emergency alerts specific to Palo Alto.

[\[more\]](#)

View the PAPD Policy Manual!

We publish a redacted version of the most up-to-date edition PAPD Policy Manual online. View the policies that guide our actions.

[\[more\]](#)



Vehicle Security

Burglaries of parked and unattended vehicles are occurring regularly all over the Bay Area, including here in Palo Alto. Here's some information on how you can take steps to protect your property.

[\[more\]](#)



Wondering Where Crime is Occurring in Palo Alto?

You can check out CrimeReports.com to see a map of Palo Alto and where crime is occurring in town!

[\[more\]](#)



Have Questions About Automated License Plate Readers?

We currently have one patrol vehicle equipped with automated license plate reader (ALPR) technology. Read our policy governing its use.

[\[more\]](#)



The Parent Project: It Will Change Your Life!

Get more information about our celebrated Parent Project program, which is designed for parents with strong-willed or at-risk teenagers.

[\[more\]](#)



Project Safety Net

Learn more about Project Safety Net, a collaborative community network held together by a common interest of fostering youth well-being in Palo Alto. PSN defines our community's teen suicide prevention efforts.

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Welcome to the Palo Alto Fire Department Home Page

June 2017: Palo Alto Foothills Community

Fire Season Update & County Wildland Training Drill

The City of Palo Alto provides emergency preparedness, community risk reduction, and emergency response to the areas of the Foothills community along Page Mill Road from the Highway 280 interchange to Skyline Boulevard. This multi-faceted approach is designed to reduce the community's risk and provide an effective response force capable of extinguishing wildland fires.

The Palo Alto Fire Department (PAFD), Office of Emergency Services (OES), and the Community Services Department Open Space Rangers (CSD) have been busy this spring preparing the Foothills community for the upcoming Fire Season. This fact sheet provides an update of the community risk reduction and emergency response preparation activities.

Community Risk Reduction

The PAFD, OES, and CSD actively partner with the Midpeninsula FireSafe Council which is a non-profit organization composed of individuals, public and private agencies, and companies that share a common interest in preventing and reducing losses from wildfires. Risk reduction projects include evacuation route planning and clearance, grass mowing, wood chipping, and other fuel reduction treatments designed to minimize the impacts of fire hazards.

In preparation for each fire season, PAFD crews inspect the Foothills community on a nearly daily basis conducting annual home defensible space assessments, wildland training, and other risk reduction projects. Every home in the Foothills community is inspected for vegetation clearance and defensible space which in a wildland fire will help keep residents and homes safe.

This year, the PAFD is hosting the County's Annual Wildland Training drill in the Foothills community from June 12 - 14. This three day region-wide drill will bring in dozens of fire crews from Santa Clara and San Mateo Counties. These crews will practice structure protection tactics, participate in simulated emergency operations, area familiarization, and other risk reduction activities. We have been working with several of your neighbors in the FireSafe Council on this event. *Expect to see a lot of fire apparatus in the Foothills community on June 12, 13, and 14.*

Emergency Response

During the upcoming Fire Season, July 1 to October 31, Fire Station 8 in Foothills Park **will be open and staffed** during Red Flag Fire Weather and extreme fire danger days. On the days Station 8 is open, it is staffed for 12-hours, 8 a.m. – 8 p.m., and can be extended due to fire weather conditions.

The PAFD operates two fire stations nearby that respond year-round to the Foothills community. Fire Station 2 (Hanover) and Fire Station 5



Please email requests to fire@cityofpaloalto.org or call phone 650-329-2111

Fire requests are received and receive a response within one week.

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(Barron Park) cover the area with response times that meet the PAFD's performance standards for the Foothills community. It is important to note that during the previous fire seasons the units assigned to Stations 2 and 5 had faster response times to calls in the Foothills community than the engine from Station 8.

In addition, the PAFD maintains Automatic Aid Agreements with the Santa Clara County Fire Department and the Woodside Fire District, who staff stations nearby and respond to calls in the Foothills community, no matter the jurisdiction.

In the event of a wildland fire, the Foothills community is protected by a region wide Mutual Aid Plan that brings significant resources from surrounding agencies including Cal Fire. These resources include:

- ▶ Numerous fire engines, equipped for structure protection and wildland fire suppression
- ▶ Handcrew firefighters who cut fuel breaks around fires
- ▶ Airplanes and helicopters capable of dropping fire retardant and water
- ▶ Chiefs to oversee and manage the incident
- ▶ County-wide fire investigation team made up of fire investigators and police officers

The City of Palo Alto also staffs CSD Open Space Rangers in the area every day. The rangers operate patrol vehicles that have water and a pump and are designed to extinguish small fires. Open Space Rangers are often the first ones to arrive at emergencies in the Foothills.

An analysis of emergencies in the Foothills area shows there is less than one call per week, and the majority of incidents are for emergency medical services. One fire was dispatched during the 2015 season, a car fire that turned out to be steam from a radiator. For comparison, the PAFD handles nearly 9,000 calls per year.

Shared Responsibility

Best practices in community risk reduction operate under a shared responsibility between individual residents, community groups such as the Midpeninsula FireSafe Council, and multiple City departments.

Please clear brush and vegetation around your homes to create defensible space. Adequate brush clearance around homes has been demonstrated time and again to be the single biggest factor for homes surviving a wildland fire. California Law and the City's Municipal Code require property owners and/or occupants to create 100 feet of defensible space around homes and buildings. If you have not yet created defensible space around your homes, now is the time to do so. All work should be completed by late June. If we can be of any assistance, please let us know.

It is important that you **take action now** to prepare your family, property, and community for the summer fire season.

Sincerely,

Eric Nickel, EFO, CFC, CFO

Fire Chief

More Details

PAFD's web page: [/gov/depts/fir/default.asp](http://gov/depts/fir/default.asp)

Midpeninsula FireSafe Council: <https://www.sccfiresafe.org/>

Ready, Set, Go: <http://www.readyforwildfire.org/Ready-Set-Go-Campaign/>

Fire Wise Communities: <http://www.firewise.org/>

Cal Fire: <http://www.fire.ca.gov/>

Please call the Palo Alto Fire Department if you need any assistance in preparing your home for the Fire Season: (650) 329-2184. We will be happy to schedule a free home inspection.

[AED Locations by Map](#)

AED location data is made available for anyone to locate a device in case of a cardiac emergency.

Last Updated: Sep 12, 2017

[Bicycle Licenses](#)

The Palo Alto Municipal Code (Section 10.64.010) requires residents to license their bikes before riding on City streets and public property.

[\[more\]](#)

[Fire Home Page](#)

Palo Alto Fire Department 2014-2018 Strategic Plan

Palo Alto Fire Department 2014-2018 Strategic Plan

Revision Date: 7/10/2017

Palo Alto Fire Department Goals

Palo Alto Fire Department Goals

Revision Date: 8/30/2017

Palo Alto Fire Department Standards of Cover

Palo Alto Fire Department Standards of Cover

Revision Date: 7/12/2017



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MIDDLE



Middle Schools

HIGH



High Schools

ADULT SCHOOL



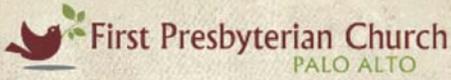
Adult School

OTHER SITES

SCHOOL FINDER

1140 Cowper St.

Sundays at 8:30am and 10:30am



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WORSHIP SERVICES, EDUCATION OFFERINGS, & MORE!



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MUSIC & CHOIR

Latest Sermon: "Liberation at the Table" - October 15, 2017

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Nov 12, 2017 - Peace and Social Justice Harvest Fair

11:00 am

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News & Announcements

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LGBTQ Christian Inclusion Panel Discussion posted on October 12, 2017

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YCS Make A Difference Day posted on October 12, 2017

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LifeMoves Benefit Breakfast posted on September 20, 2017

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Our Commitment to Being a Peace Church posted on August 10, 2017

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Sushirito
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Tamarine
Thaiphoon
Three Seasons
The Bar

California & American

BARE
Crepevine
Cheesecake Factory
Coconuts
MacArthur Park
Gravity Wine Bar
New York Pizza
Nola
Lyfe Kitchen
Peninsula Creamery
Patxi's Chicago Pizza
Pizza My Heart
Pluto's
Round Table Pizza
Rose & Crown
Sam's Chowder House
Saint Michael's Alley
Scotty's Bar
Spot a Pizza Place
The Old Pro
The Patio
Sliderbar Cafe
Umami Burgers
Vino Locale

Dessert

Claudio Corallo Chocolates
CREAM
Chremistry
Chantal Guillon
Fraiche Yogurt
Gelataio
L'Amour
Timothy Adams Chocolates
Yogurtland

Mexican, Carribean & Brazilian

Joya Restaurant/Lounge
La Morenita

Shopping

In alphabetical order:

Apple
AT&T
Arnoldi Jewelers
Bell's Books
Black Diamond Sports
Blu
Bryn Walker
Cassis
Charmelle 28 Fine Lingerie
Chico's
Cielo
C.V.
CVS
Denovo Fine Contemporary Jewelers
Design Within Reach
Duxiana
Five Ten Gifts
Footwear Etc.
Gleim The Jeweler
Good Vibrations
Hemingway Cigars/Tobacco
House of Foam
J. Foss
Jos. A. Bank Clothiers
Keen Garage
Letter Perfect
Lu Lu Lemon Athletica
Mac's Smokeshop
Mansoor + Gore Jewelers
McCroskey Airflex
Mills The Florist
Mirabelle Jewellery
Palo Alto Bicycles
Palo Alto Hardware (Hasset Hardware)
Patagonia
Peninsula Beauty Supply
Peninsula Optical
Phyllis
Rejuvenation
Restoration Hardware
Romi Boutique
RocketFizz
Site For Sore Eyes
Sprint PCS Store
Shade Store
Synergy
T-Mobile
Title Nine
The Goldsmith
The Wine Room
Van's
Verizon
Velo Tech
Walgreen's
West Elm



Pampas
Reposado
Sancho's Taqueria
Tacolicious

Café, Deli, Coffee House & Bakery

Café Renaissance
Café Venetia
Coupa Café
Da Hooka Spot/Da Coffee Spot
David's Tea
Epi Gourmet Sandwiches
Garden Fresh
Lemonade
New York, New York Deli
Paris Baguette
Peet's Coffee & Tea
Philz Coffee
The Prolific Oven
Sprout Café
Starbuck's
Tea Time

European & Mediterranean

Arte Ristorante
Bella Luna
Bistro D'Asie
Bistro Maxine
Buca di Beppo
Cafe 220
Cafe Renzo
Curry Up Now
Ewia Estiatorio
Gyros Gyros
JOYA
Oren's Hummus
Osteria Cucina Toscana
OPA!
Pizzeria DelFina
Il Fornaio Cucina Italiana
Round Table Pizza
La Strada
Vero
Vivre Ristorante
Zola

Grocery

7-Eleven
Whole Foods Market