

# **Attachment A**

# WFXR-WWCW CONTOUR OVERLAP MAP

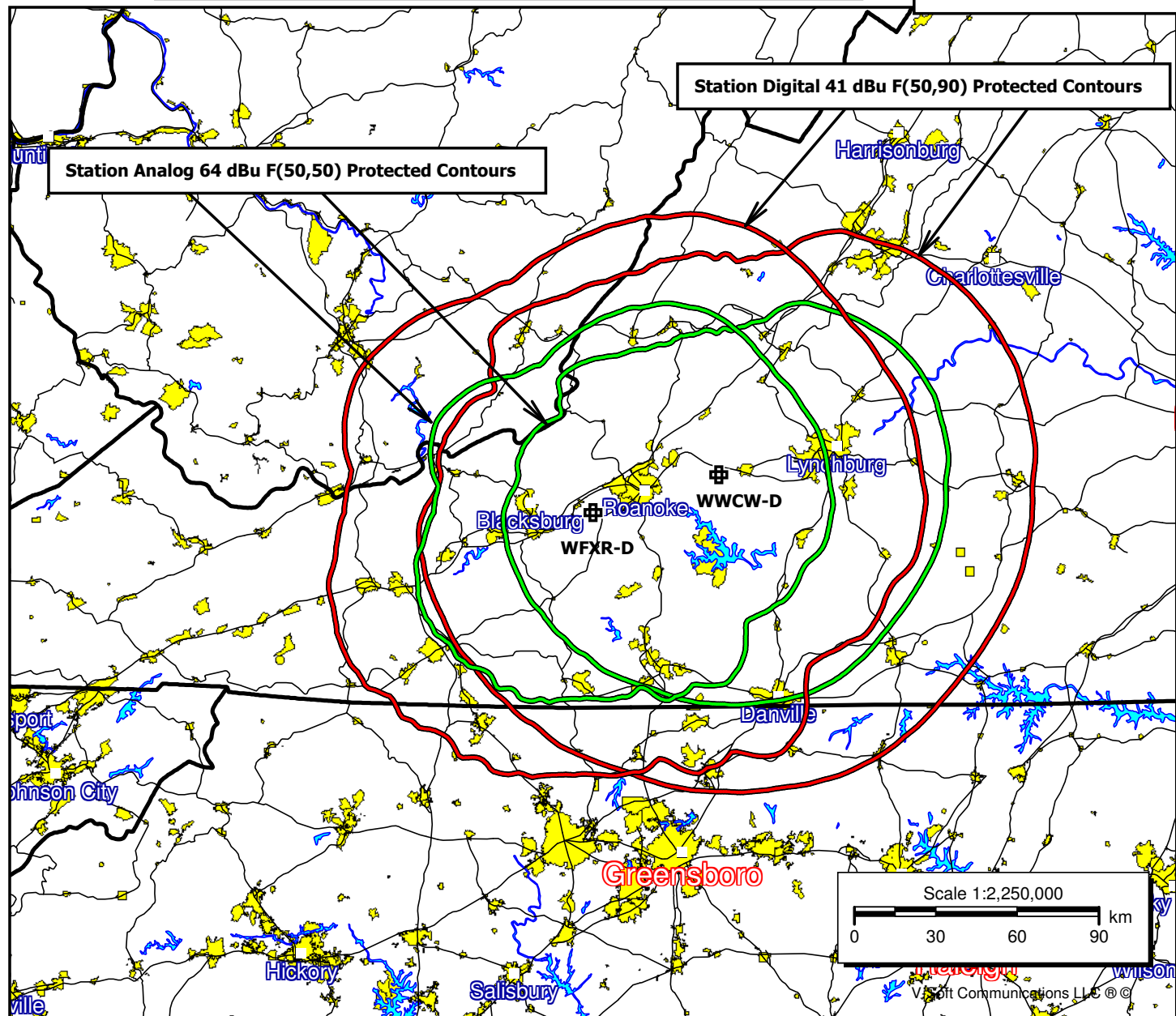
Greg Best Consulting, Inc.

## WFXR-D

BLCDT20090609ABS  
Latitude: 37-11-47.30 N  
Longitude: 080-09-15.50 W  
ERP: 695.00 kW  
Channel: 17  
Frequency: 491.0 MHz  
AMSL Height: 1172.0 m  
Elevation: 1138.0 m  
HAAT: 594.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: Yes  
Elec Tilt: 1.25  
Prop Model: None

## WWCW-D

BLCDT20090619ABM  
Latitude: 37-19-14 N  
Longitude: 079-37-58 W  
ERP: 916.00 kW  
Channel: 20  
Frequency: 509.0 MHz  
AMSL Height: 838.7 m  
Elevation: 573.9 m  
HAAT: 500.3 m  
Horiz. Pattern: Directional  
Vert. Pattern: Yes  
Elec Tilt: 1.0  
Prop Model: None



# **Attachment B**

November 19, 2013

Barbara Kreisman, Esq.  
Chief, Video Division  
Media Bureau  
445 12<sup>th</sup> St, S.W.  
Washington, D. C. 20536

Re: Request for continuance of the satellite waiver of WWCW, Lynchburg, Virginia with WFXR, Roanoke, Virginia

Dear Ms. Kreisman:

I have been requested to provide comments regarding the merits of continuing the operation of WWCW as a satellite of WFXR serving the Roanoke-Lynchburg, Virginia television market as defined by Nielsen.

I have over 40 years in the broadcast industry in several capacities including ownership, management and brokerage of broadcast stations. I am the founder and president of CobbCorp, LLC and a founder and former Managing Director of Media Venture Partners, both nationally recognized brokerage and appraisal firms. During the last 30 years, I have been personally involved in the brokerage of more full power television stations than any other broker in the United States. I am a former President of the National Association of Media Brokers and a recipient of the Broadcast Foundation of America's leadership Award.

The Commission has set out three criteria under which the FCC will presume that the common ownership of a main station and a satellite would serve the public interest:

1. There is no city grade overlap between the parent and the satellite station;
2. The satellite station would provide service to an underserved area;
3. No alternative operator is ready willing and able to construct or purchase the satellite to operate as a full service facility.

I am familiar with the Roanoke-Lynchburg market, the television signals available, the level of competition and other relevant market information. There are six full power operating commercial television stations licensed in the DMA. The DMA is the 66<sup>th</sup> ranked market in size as defined by Nielsen. However, the estimated market revenue in the market is ranked 78<sup>th</sup>. This is an unusual disparity attributable to the underlying economic indices of the area.

In regards to the first criteria, there was overlap of the respective analog city grade signals. However, as pointed out by you in your previous decision to grant the application for assignment of the licenses, the terrain in which Lynchburg and Roanoke are situated is atypical with the Blue Ridge Mountains separating the station transmitters. Allowing continuation of the status quo, virtually 100% of viewers can be reached. Secondly, by definition, the satellite's community is under served with only one other full power station in Lynchburg.

WWCW serves as a satellite of WFXR. However, in order to better serve the needs of the two different cities of license, WWCW carries the CW network on its main channel and FOX on its secondary digital channel. WFXR carries FOX on its primary channel and the CW on its secondary channel. This not only gives viewers in the bifurcated DMA an additional programming choice, but provides a service that as a standalone, WWCW, and in fact WFXR, would be unable to provide. Additionally, if WWCW was a standalone operation, without one of the big four networks, it would be doubtful if they could obtain cable coverage in parts of the DMA. If they can't reach some cable head ends and without a significant network affiliation, they wouldn't be able to get cable carriage. As a result of this approach, the stations not only provide service to an underserved area, they are provided two choices on each side of the market.

One other factor has not changed. If WWCW was forced to operate as a standalone, it would not be financially viable. Even if they were able to retain the CW affiliation, they would not cover enough of the market via over the air or cable to compete and garner enough revenue to adequately serve the needs of their community. The CW also does not provide enough programming content or audience acceptance to add much to the equation. This economically challenged market has already had stations go dark. The advantage of letting this entity continue to provide service to underserved areas as well as adding an additional choice of programming far outweighs the alternative.

For the reasons stated added to my opinion that there would not be a qualified operator available to change the station into a viable standalone, I feel the public interest would be served by the continued operation of WWCW as a satellite of WFXR.

Sincerely,



Brian E. Cobb