

Channel 20 TV Company
KUPN-DT, Sterling, Colorado; Facility ID # 63158
Form FCC 301
File No. BMPCDT-20080602AJL

Public Interest Statement

In this application, Channel 20 TV Company (“CTTC”), licensee of KUPN-TV, Sterling, Colorado, seeks the Commission’s consent to the next step in the conversion of KUPN from an analog satellite incapable of sustaining its own operations to an independent, stand-alone, full-service digital television station serving viewers across a wide area in the state of Colorado. This unopposed application proposes a facility that will continue to serve the station’s community of license, Sterling, causes no interference to any other station beyond that permitted by the Commission’s rules, and does not require any waiver. The sole issue raised by the application is the creation of a “white area” in a rural Colorado area that is perhaps only technically served by KUPN-TV. Indeed, CTTC has been unable to find any evidence of actual viewership within this area. This white-area issue is significantly outweighed by the benefits the proposed facility would provide to a much larger viewing audience, including areas that would receive a first full-power television service. The issue is further offset by “concomitant factors”¹ that militate in favor of the grant of CTTC’s application.

¹ The Commission’s policy disfavoring the creation of white areas arises from Sections 1 and 307 (b) of the Communications Act of 1934, as amended, which direct the Commission to make broadcast facilities available as far as possible to all the people of the United States and to provide a fair, efficient, and equitable distribution of service. Television Corporation of Michigan, Inc. v. FCC, 294 F.2d 730, 732 (D.C. Cir. 1991), *citing* the Commission’s Sixth Report and Order, Pike & Fischer Radio R. 91.599 at 91.620 (April 1952). This policy was tested in Hall v. FCC, 237 F.2d 567 (D.C. Cir. 1956) which, like Television Corporation of Michigan and the instant application, involved the increase of service to some areas and decrease to others. In Hall, the Court said that such a curtailment of service “might be offset by concomitant factors.” Id. at 572.

Background and History

Since it first began broadcasting (as KTVS(TV)) in 1964, KUPN has always relied on a neighboring affiliated station for its economic viability. Originally, the station rebroadcast the programming of KFBC-TV (later KGWN-TV) in the adjacent Cheyenne, Wyoming DMA. In 1995, in the context of a transfer of control decision, the Commission approved the continued operation of KTVS as a satellite station and noted that it served only a small community within a large, competitive market. The Commission cited statements by media broker Brian Cobb to the effect that no competent media broker would attempt to sell KTVS as a full-service, stand-alone station because the effort would be futile and a "misuse of time given the sparsity of available revenue."² In 1999, CTTC purchased KTVS and operated it as a satellite of KTVD, Denver (Sterling is within the Denver DMA).

In 2002, CTTC changed the station's call sign to KUPN to reflect the affiliation at that time of KTVD with the UPN Television Network. When KTVD was sold in 2006, CTTC decided to try, for the first time, to operate KUPN as a full-service, stand-alone station, the sole television station licensed to Sterling, and a new independent media voice for the Denver market.

KUPN-TV delivers a Grade B signal to only about 32,000 homes³ in a market of over 1.4 million television households; less than three percent of the DMA population. While Denver is the 18th largest DMA in the nation, KUPN now serves an area the equivalent of market number 204 (larger than Presque Isle, Maine; but smaller than Zanesville, Ohio), yet it must compete

² Stauffer Communications, Inc., 10 FCC Rcd. 5165 (1995), ¶ 12.

³ Approximately 81,300 people.

with Denver television stations for advertising sales and the acquisition of programming.⁴ KUPN has not produced any revenue since its purchase by CTTC and has not broadcast any local or national spot advertising since it ceased operating as a satellite. KUPN is not carried on any cable systems, nor is it retransmitted by EchoStar or DirecTV. The station cannot be received over-the-air in Denver, the largest city by far in the DMA. It has no reported viewership on any ratings survey.⁵ Because it is within the Denver DMA, it needs to pay Denver prices for programming and, furthermore, because most syndicated programming has a barter component, with no demonstrable viewership, syndicators are not interested in the station as a programming vehicle.

CTTC has made attempts in the past to improve KUPN's facilities and provide an improved broadcast service to the communities of Northeast Colorado. In June 2002, CTTC filed a petition for rulemaking to amend the television and digital tables of allotments, proposing to move NTSC channel 3 and DTV channel 23 from Sterling to Fort Morgan, Colorado.⁶ During the pendency of that rulemaking proceeding, the Commission eliminated the vacant allotment for NTSC channel 18 in Sterling, making KUPN the community's only possible television service. In November, 2004, CTTC requested the dismissal of the rulemaking proceeding, noting the higher bar for removal of a community's only television service, and substituted an application which retained Sterling as the community of license, but would have improved the station's

⁴ See Exhibit A, the attached Declaration of KUPN's General Manager.

⁵ See, e.g., Exhibit E, e-mail from Senior Account Executive of the Nielsen Company to the KUPN General Manager ("Unfortunately, KUPN has not achieved enough viewing to be included in our overnight or our cume (unduplicated audience) analyses.

⁶ See MB Docket No. 02-388, RM-10624, DA 02-3567 (Notice of Proposed Rule Making released December 24, 2002).

broadcast signal.⁷ The Commission dismissed the November 2004 application because it proposed an increase in the station's DTV service area inconsistent with the freeze that the Commission had imposed on August 3, 2004, during the time that CTTC's petition for rulemaking was before the Commission.

In October, 2007, at the suggestion of Commission staff, CTTC filed a petition for reconsideration of the Commission's Seventh ATV Report and Order,⁸ seeking a change in Appendix B to that Report and Order and requesting the parameters that form the basis of the instant application. In its reconsideration of the Seventh Report and Order,⁹ the Commission denied CTTC's petition, among others, stating, "We appreciate that these stations registered their preferences with us as petitions for reconsideration, but we conclude that the stations identified in Appendix D5 can use the application process to request the facility they seek to build."¹⁰

The Commission lifted its freeze on the filing of applications that would increase the coverage areas of digital television stations effective Friday May 30. On the next business day, Monday June 2, CTTC filed this application.

Grant of this Application Will Serve the Public Interest.

CTTC's consulting engineer, Louis R. du Treil, Jr. of du Treil, Lundin & Rackley, Inc. ("du Treil"), has provided a comparison between the current KUPN-TV analog Grade B contour

⁷ See File No. BMPCDT-20041105AQA.

⁸ Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service, FCC 07-138 (released August 6, 2007) (the "Seventh Report and Order").

⁹ Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order and Eighth Report and Order, FCC 08-72 (released March 6, 2008).

¹⁰ Id., ¶ 87. See also Appendix D5, listing KUPN.

and the proposed full-service digital facility.¹¹ The total population of the new area to be served by KUPN-DT (the “Gain Area”) would be 2,097,908 with 1,575 receiving a first full-power television signal. The area that is currently within KUPN-TV’s Grade B contour, but would not be served by KUPN-DT (the “Loss Area”) contains 6,658 persons who would not receive a full-power digital signal. These residents, however, have other viewing options including translators, cable, and direct broadcast satellite (“DBS”) services. Indeed, there is no evidence that any of these persons have ever actually watched KUPN-TV; the station has not been able to generate enough viewers to be reportable in the Nielsen ratings.

As far back as 1984 the Commission determined that the creation of white areas could be mitigated by the availability of alternative video services.¹² Even in 1984, there was no reason to believe that persons living in remote television fringe areas would rely on the availability of a single weak Grade B signal. Instead, they were likely to subscribe to cable service or procure “equipment enabling them to receive signals from beyond a station’s Grade B Contour.”¹³ If the technology had been available then, the Commission could have been describing DBS service. The Commission found that the public interest is best served by treating the various forms of alternative service as a single video marketplace.

Within the Loss Area there is a very active system of community-owned translators that has been in operation since 1993. These translators carry the signals of Denver affiliates of Fox, CW, CBS, ABC, NBC, MyTV, and two PBS stations (but not KUPN-TV, which has been unable to acquire programming which would make the station attractive enough to merit independent

¹¹ Exhibit B, attached.

¹² KTVO, Inc., 57 Rad. Reg. 2d (P&F) 648 (1984), ¶ 5.

¹³ Id.

translator service¹⁴). duTreil's Technical Statement demonstrates that excluding the population served by these translators, the Loss Area contains only 1,148 persons who would be in a white area, while the proposed facility would provide a digital signal to more people (1,241) in the Gain Area who are currently without any full-power broadcast signal.

Additionally, as the 1984 Commission foretold, cable and DBS are thriving in the Loss Area. The affected area includes portions of Logan, Sedgwick, Phillips, and Yuma Counties. According to Nielsen TV reports, cable penetration in Logan County is 56.6% and an additional 36.2% of homes subscribe to "Alternative Delivery Systems" ("ADS"), which is primarily DBS, but could include Satellite Master Antenna TV ("SMATV") and private C-Band satellite reception as well. That's a total of 92.3% of Logan County homes that do not rely on over-the-air broadcasting. According to Nielsen statistics, *all* 1,090 homes in Sedgwick county would seem to subscribe to either cable or ADS. 95% of the 1,790 homes in Phillips County rely on cable or ADS for television delivery, and in Yuma County, 3% of homes are cabled and 93% use ADS.¹⁵ Given the significant translator systems and the cable and ADS penetration figures, it is unlikely that any home in the Loss Area would be without a variety of television offerings from which to choose and the white area population, if any, would be *de minimis*. Furthermore, because KUPN-TV is not on any of these delivery systems, viewers are watching television, but not watching KUPN-TV and it becomes obvious that the station, as currently configured, will

¹⁴ See, e.g., Exhibit C, attached, the list provided by the "Region 1+" translator system and an entry from the Logan County Government website. Each lists translators and the Denver stations they carry. The operator of the Region 1+ translator system has indicated that if KUPN were to acquire desirable programming, there might be translator carriage, but until the station can acquire viewers, such programming is beyond its means. Viewers in the Loss Area are now receiving broadcast television by analog signals and will probably continue to do so beyond the February 2009 transition. Thus, analog translator service is an effective way of reaching this audience.

¹⁵ See Exhibit D, Nielsen Universe Estimates of cable and ADS penetration (highlighting added for the counties discussed herein).

never be able to attract ratings and advertisers to justify the capital expenditures for equipment and the purchase of desirable programming.

The Commission has also considered financial issues as “concomitant factors” to offset the creation of white and gray areas.¹⁶ “Severe and continuing financial losses sustained over a period of several years” left a financially failing independent station located in the outskirts of a DMA unable to compete for advertising revenues, but the Commission determined that a modified, more competitive station would offer the possibility of economic viability.¹⁷ Similar circumstances have placed KUPN-TV in its current condition. Indeed, by approving satellite station waivers for KUPN-TV, the Commission has already determined that the station, as it now exists, is not sustainable. There is also another huge counterbalancing concomitant factor: the digital transition. KUPN-TV cannot simply continue to operate indefinitely as it has; in seven months it must cease analog operations. CTTC is willing to invest in the construction of a new digital facility, and, in fact, with quick Commission approval, could have the proposed station operating by early next year and for the first time become a viable viewing option in Northeastern Colorado. An improved signal alone will not guarantee success, but CTTC is willing to try; however, the company needs to be able to recover its investment in the digital facility and in new programming. Without the ability to compete for viewers and advertisers with a more robust signal covering more populous areas of the Denver DMA, this would be an impossible task.

¹⁶ Coronado Communications Company, 8 FCC Rcd 159 (1992).

¹⁷ Id., ¶ 13.

Conclusion.

CTTC's application is unopposed. The proposed facility would cover KUPN-DT's community of license and meets the Commission's interference criteria. CTTC does not seek any waiver of Commission rules. Given the real-world options currently available to viewers in the Loss Area – translators, cable, and ADS – the number of homes that will actually be in a white area following the grant of this application would be *de minimis*. Grant of this application will enable a vibrant, full-service digital television station to rise from the rubble of a station that has always been a satellite and that now has no measurable viewership. For all these reasons, the public interest would be served by the Commission's grant of CTTC's application.

Exhibit A

Declaration of Greg Armstrong

KUPN General Manager

Channel 20 TV Company
KUPN-DT, Sterling Colorado; Facility ID # 63158
Form FCC 301
File No. BMPCDT-20080602AJL

Declaration of Greg Armstrong

I am President and General Manager of KUPN(TV), Channel 3, in Sterling, Colorado, a position I have held since September of 1999. Prior to June 27, 2006, I held this position for both KUPN and KTVD(TV), Denver. I have been involved in the television broadcasting business for about 25 years. Channel 20 TV Company ("CTTC"), the licensee of KUPN, and Twenver Broadcast, Inc., formerly the licensee of KTVD, are commonly owned. CTTC purchased KUPN in September, 1999 and operated it as a satellite of KTVD until June 2006. At that time, when Twenver sold KTVD, we decided to retain KUPN and transform it into a full-service digital television station that would provide an independent media voice in the Denver DMA.

To make this transformation, CTTC will need to improve the KUPN broadcast signal. KUPN's analog transmitter and tower currently provide coverage only to the area immediately surrounding the station's city of license. Sterling is located in the northeast corner of Colorado and is surrounded on all sides by extensive agricultural land. Although Sterling is within the Denver DMA, ranked 18th in the nation by Nielsen, Channel 3's signal covers only a small portion of the market's 1,431,910 television households. The current predicted coverage contours of the station, at best, provide a Grade B signal to approximately 81,300 persons. Using the persons-per-household estimates prepared by the United States Census Bureau for the counties within KUPN's Grade B coverage area, the station's maximum reach is between 31,000 and 33,000 TV households. This is fewer than three percent of the households in the Denver DMA and the equivalent of Nielsen DMA number 204: somewhat larger than Presque Isle, Maine, but smaller than Zanesville, Ohio.

KUPN is not carried on any cable systems, nor is it retransmitted by EchoStar or DirecTV. It cannot be received over-the-air in Denver, the largest city by far within the DMA, or in any of Denver's suburbs. Since becoming a stand-alone station, KUPN has not scored any measurable viewership in any television rating report. KUPN broadcasts programming provided by America One; it is not affiliated with any of the nine largest national television networks.

I don't believe that KUPN has ever received any national advertising revenue on its own. Certainly, during the 9 years CTTC has owned the station and operated it as a satellite, it has never contributed to our revenues at all.

It would be extremely difficult, if not completely impossible to make KUPN an economically stable station with its current coverage area. Obtaining viable programming is

challenging with its current signal, as a vast majority of syndicated programming, including Core children's programs, have some barter component. Since there have been no measurable ratings in the Denver DMA for KUPN, syndication companies have no incentive to clear programming on the station, as the barter within the shows would be of no value to them. I have had preliminary conversations with many large syndication companies, such as Disney, and they have confirmed this. Purchasing cash programming is equally daunting, as the lack of measureable viewing audience and the limited population of KUPN's current service area prohibit program purchases at Denver DMA prices. Stations that are in DMAs equivalent to our coverage area, such as Presque Isle and Zanesville, have most of their programming needs filled by major national networks; they don't have much more powerful competitors who have locked in affiliations with all of the national networks. Although KUPN is unlikely to become a major network affiliate, an improved signal would at least provide us with the opportunity to acquire programming that is unavailable with our existing signal.

The digital conversion presents both the opportunity to improve the station's coverage area as well as an overwhelming challenge. With no revenue being generated by the station at this point, we could not justify the expense of the equipment and construction necessary to create a digital facility if the digital signal would serve only the same population as the analog does. Because the station has always been a satellite of another station, it has only the barest of minimum facilities for the origination of programming. The existing building and equipment are museum-quality and only the tower is useable. A digital conversion would require a complete transformation including building reconstruction, new transmitter, antenna, transmission line, studio and office equipment, servers, and all ancillary support equipment and cabling. The previous station I managed, KTVD, had infrastructure that was compatible with digital broadcasting because it was a competitive station in the Denver DMA and therefore justified capital investments. The financial realities of KUPN are historically the complete opposite, so any digital conversion would in essence be an investment and build-out from the ground up. A tower move and power increase will provide the opportunity to make this station viable. We have continuously attempted to get the Commission's approval to expand the signal and service area. We stand ready to make the commitment of effort and money to build a digital television facility, but cannot do it if we know, going in to the project, that the station will serve such a tiny population that it would never succeed financially.

Working with Bob du Treil of du Treil, Lundin & Rackley, Inc., we have come up with the design of a digital broadcast facility that we believe will work. It requires moving the transmitter to a new site near the town of Hoyt, Colorado and building a new television tower there. Since we will need to rebuild anyway, from this position KUPN-DT could serve Sterling, its community of license, and also provide a signal to the communities to the Southwest and Northwest. The population served would increase from 81,000 to 2,316,000 persons. That would give us a real shot at becoming at least a small competitor in the Denver DMA. This would finally provide KUPN the opportunity to develop viewership and revenue to operate as a non-satellite station for the first time in its 43-year history.

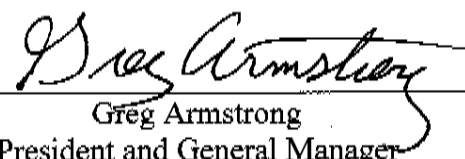
Although much larger, the proposed digital signal will not cover all areas that are currently served by KUPN-TV. We do not believe that this will be a disservice to the public, however, as we are unaware of any actual viewers of the station in that area. Nielsen reports that

the counties in that area well served by translator systems, cable, and DBS. In fact, in Sedgwick County, virtually all homes are served by one of these technologies. KUPN-TV is not carried by any of these systems. It is our intention to acquire attractive programming and build an audience, but that is not economically feasible without a larger broadcast footprint. The operator of the Region 1+ translator system has indicated that if the station were to acquire desirable programming, he would consider adding it to his translator network. If the station is retransmitted by that system in an area where residents generally get their off-air television by translators, it would also be an effective way to reach viewers who are accustomed to analog reception and at this time have no need for digital receivers.

We have located a site for the proposed tower. We have secured a special use permit from the Board of County Commissioners of Morgan County. We have cleared the site with the FAA and registered it with the FCC. What we need now is the consent of the FCC to construct the digital station according to this new plan.

The closer we get to the end of analog broadcasting in February, 2009, the more critical it becomes to secure FCC approval soon. We need to order the equipment, contract for the tower construction, build digital studios, and make sure we are able to put it all together in time to meet the deadline. We still believe this is possible, weather permitting, with a quick approval by the Commission.

We see this as a major opportunity to construct and operate a television station that could provide a real public service to the area, as opposed to the current operation which is practically invisible. We're ready to get started as soon as the Commission will permit it.


Greg Armstrong
President and General Manager
KUPN(TV)
Channel 20 TV Company

July 18, 2008

Exhibit B

Technical Statement

of

du Treil, Lundin & Rackley, Inc.

TECHNICAL STATEMENT
CONCERNING OTHER TELEVISION SERVICES ANALYSIS
TELEVISION STATION KUPN-DT
STERLING, COLORADO
CHANNEL 23 1000 KW 402 M

This statement was prepared on behalf of television station KUPN-DT, Sterling, Colorado concerning an analysis of other post-transition digital television services within its predicted 41 dBu, f(50,90) noise-limited ('equivalent Grade B') contour gain and loss areas relative to the KUPN-TV (Channel 3) analog Grade B contour.

The analysis was conducted using the predicted equivalent Grade B contour of KUPN-DT and the predicted equivalent Grade B contours of all other full-service post-transition digital television stations with predicted contours overlapping that of KUPN-DT. The Grade B and equivalent Grade B contours were calculated according to the conventional methods outlined in the FCC Rules using the N.G.D.C. 30-second terrain database. The FCC CDBS Engineering Database was the source of the technical information for the stations under study.

The predicted contours of the subject stations were projected on a map and a count of other post-transition digital television services throughout the gain and loss areas of the KUPN-DT/TV Grade B contours area was made. The population was analyzed using the 2000 Census block data and area was analyzed through numerical integration. Figure 1 is a map showing the predicted KUPN-DT/TV gain and loss areas and the other effective Grade B post-transition digital television services.

Figure 2 is a map identical to Figure 1 except with the addition of all low power television/TV translators (LPTV) and Class A television protected contours included. The LPTV/Class A contours employed in the analysis are for all such stations licensed for operation in the core band on Channels 2 through 51. Figure 3 is a tabulation of the full-service and LPTV/Class A stations considered in this analysis.

The tables below summarize the results of the analysis:

Considering Post-Transition Full-Service Digital Facilities

| | Other Post-Transition DTV Services Available in <u>Gain</u> Area | | | Total KUPN-DT Gain Area |
|----------------------|--|-----------------|----------------------|-------------------------------|
| | 0 | 1 | 2 or more | |
| Population (2000) | 1,575 (0.1%) | 3,635 (0.2%) | 2,092,698 (99.7%) | 2,097,908 (100%) |
| Area (sq. km) | 4,620 (20.2%) | 811 (3.5%) | 17,450 (76.3%) | 22,881 (100%) |

| | Other Post-Transition DTV Services Available in <u>Loss</u> Area | | | Total KUPN-TV Loss Area |
|----------------------|--|-------------------|-------------------|-------------------------------|
| | 0 | 1 | 2 or more | |
| Population (2000) | 6,658 (23.2%) | 6,005 (20.9 %) | 16,095 (55.9%) | 28,758 (100%) |
| Area (sq. km) | 5,105 (36.8%) | 1,959 (14.1%) | 6,790 (49.0%) | 13,854 (100%) |

Considering Post-Transition Full-Service Digital Facilities and Including all Licensed Core-Band (2-51) Analog and Digital LPTV/Class A

| | Other Post-Transition DTV Services Available in <u>Gain</u> Area | | | Total KUPN-DT Gain Area |
|----------------------|--|-----------------|----------------------|-------------------------------|
| | 0 | 1 | 2 or more | |
| Population (2000) | 1,241 (0.1%) | 3,946 (0.2%) | 2,092,721 (99.7%) | 2,097,908 (100%) |
| Area (sq. km) | 3,568 (15.6%) | 1,726 (7.5%) | 17,587 (76.9%) | 22,881 (100%) |

| | Other Post-Transition DTV Services Available in <u>Loss</u> Area | | | Total KUPN-TV Loss Area |
|----------------------|--|------------------|-------------------|-------------------------------|
| | 0 | 1 | 2 or more | |
| Population (2000) | 1,148 (4.0%) | 9,537 (33.2%) | 18,073 (62.8%) | 28,758 (100%) |
| Area (sq. km) | 2,114 (15.3%) | 5,308 (38.3%) | 6,432 (46.4%) | 13,854 (100%) |

In addition to the above, it is noted that the common area shown on Figures 1 and 2 contains a population of 52,026 and an area of 12,540 sq. km.

The total population of the KUPN-DT equivalent Grade B contour is 2,149,934 and it contains an area of 35,421 sq. km.

The total population of the KUPN-TV Grade B contour is 80,784 and it contains an area of 26,394 sq. km.

Therefore, based on the above, the proposal will result in a net gain in service population for KUPN-DT relative to the KUPN-TV facility of 2,069,150.

Although there will be unserved area created as a result of the KUPN-DT proposal amounting to a population of 6,658, much of this population is served by other analog and digital LPTV/Class A stations that will continue operations indefinitely past the February 17, 2009 DTV transition deadline. As indicated above, when considering licensed analog and digital LPTV/Class A stations operating in the core band of TV channels (2-51), the population within the unserved areas in the KUPN-DT / KUPN-TV gain and loss areas is essentially equivalent. The loss area unserved area has a population of 1,148 and the gain area unserved area has a population of 1,241. Therefore, the net effect of the proposal is essentially no change in unserved area, with a net gain in service to over two million people.

This statement was prepared by me or under my direction and it is true and correct to the best of my knowledge and belief.

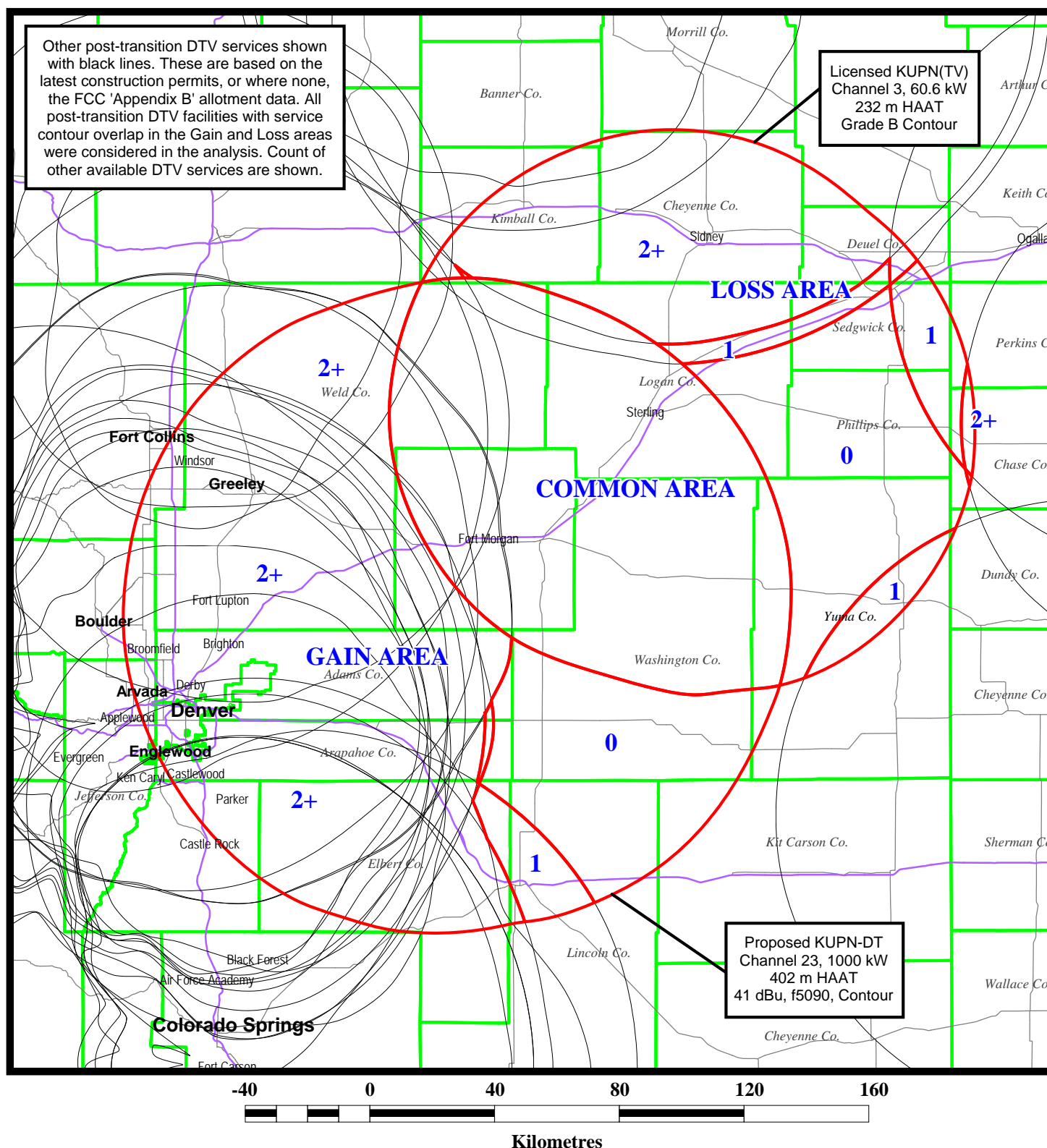


Louis R. du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, Florida 34237

July 16, 2008

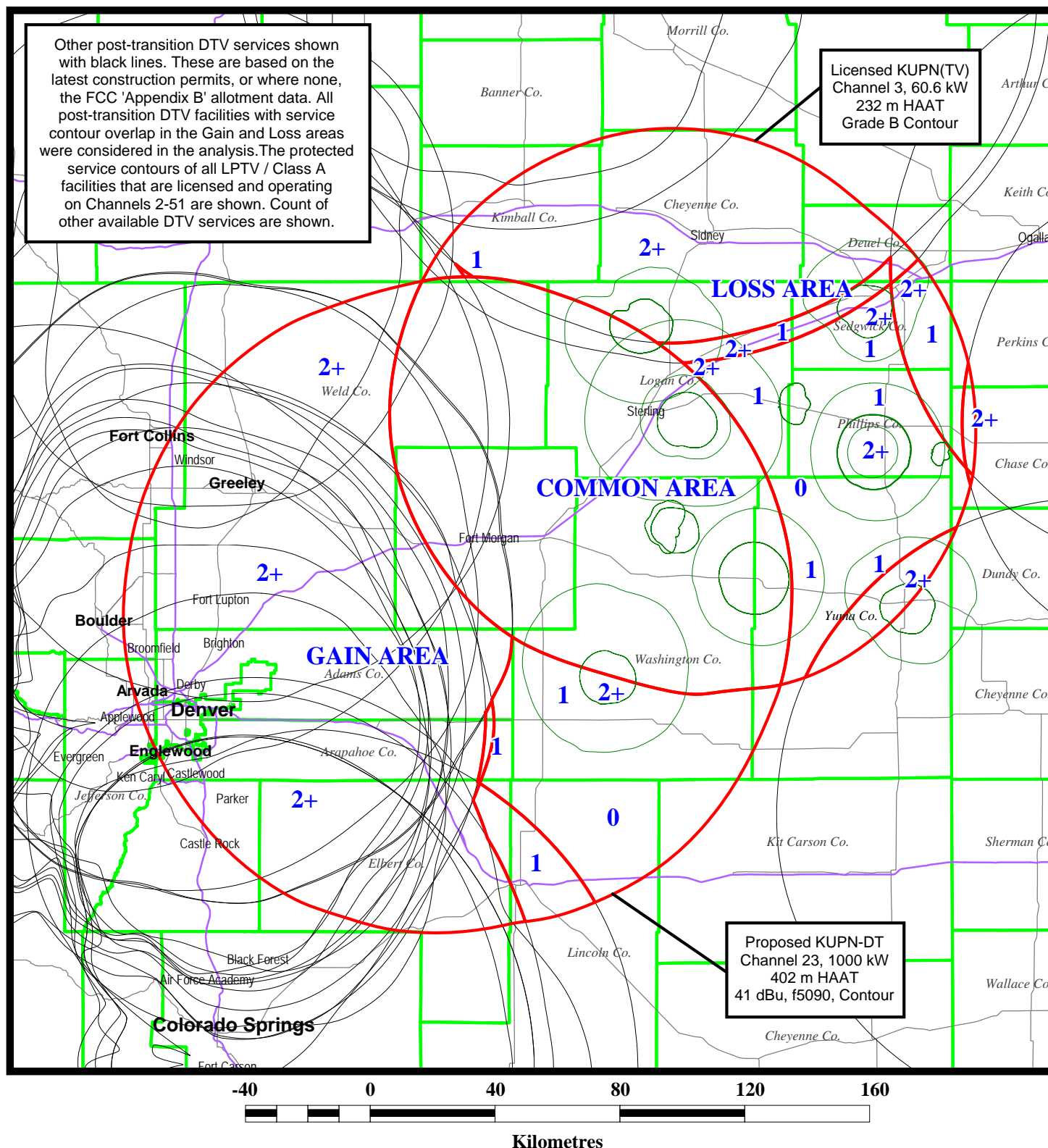
Figure 1



PREDICTED COVERAGE CONTOURS AND OTHER POST-TRANSITION DIGITAL TELEVISION SERVICES

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 2



PREDICTED COVERAGE CONTOURS AND OTHER
POST-TRANSITION DIGITAL TELEVISION SERVICES
WITH ANALOG AND DIGITAL LPTV/CLASS A

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

TECHNICAL STATEMENT
CONCERNING OTHER TELEVISION SERVICES ANALYSIS
TELEVISION STATION KUPN-DT
STERLING, COLORADO
CHANNEL 23 1000 KW 402 M

Stations Considered in Analysis of Other Television Services

| Call Sign | Service | City of License | State | Channel |
|-----------|---------|------------------|-------|---------|
| KMGH-TV | DT | DENVER | CO | 7 |
| KDUH-TV | DT | SCOTTSBLUFF | NE | 7 |
| KUSA-TV | DT | DENVER | CO | 9 |
| KPNE-TV | DT | NORTH PLATTE | NE | 9 |
| KKTV | DT | COLORADO SPRINGS | CO | 10 |
| KBSL-TV | DT | GOODLAND | KS | 10 |
| KQCK | DT | CHEYENNE | WY | 11 |
| KBDIDT | DT | BROOMFIELD | CO | 13 |
| KTNE-TV | DT | ALLIANCE | NE | 13 |
| KTFD-TV | DT | BOULDER | CO | 15 |
| KTUW | DT | SCOTTSBLUFF | NE | 17 |
| KRMA-TV | DT | DENVER | CO | 18 |
| KWNB-TV | DT | HAYES CENTER | NE | 18 |
| KTVD | DT | DENVER | CO | 19 |
| KFCT | DT | FORT COLLINS | CO | 21 |
| KXRM-TV | DT | COLORADO SPRINGS | CO | 22 |
| KRDO-TV | DT | COLORADO SPRINGS | CO | 24 |
| KLWYDT | DT | CHEYENNE | WY | 27 |
| KDEN | DT | LONGMONT | CO | 29 |
| KSTF | DT | SCOTTSBLUFF | NE | 29 |
| KGWNDT | DT | CHEYENNE | WY | 30 |
| KDVR | DT | DENVER | CO | 32 |
| KWGN-TV | DT | DENVER | CO | 34 |
| KCNC-TV | DT | DENVER | CO | 35 |
| KPIR-DT | DT | GREELEY | CO | 38 |
| KRMT | DT | DENVER | CO | 40 |
| KOAA-TV | DT | PUEBLO | CO | 42 |
| KPXC-TV | DT | DENVER | CO | 43 |
| KWHD | DT | CASTLE ROCK | CO | 46 |
| KVSN | DT | PUEBLO | CO | 48 |
| KVSN | DT | PUEBLO | CO | 48 |

TECHNICAL STATEMENT
CONCERNING OTHER TELEVISION SERVICES ANALYSIS
TELEVISION STATION KUPN-DT
STERLING, COLORADO
CHANNEL 23 1000 KW 402 M

Stations Considered in Analysis of Other Television Services

| Call Sign | Service | City of License | State | Channel |
|--|---------|----------------------|-------|---------|
| Low Power TV / TV Translator / Class A Stations | | | | |
| K14JZ-D | LD | PEETZ | CO | 14 |
| K27IH-D | LD | HOLYOKE | CO | 27 |
| K28JH-D | LD | YUMA | CO | 28 |
| K31IQ-D | LD | STERLING | CO | 31 |
| K31IH-D | LD | WRAY | CO | 31 |
| K45IS-D | LD | JULESBURG | CO | 45 |
| K51HS-D | LD | ANTON | CO | 51 |
| K08ND | TX | AKRON | CO | 8 |
| K11UW | TX | AKRON | CO | 11 |
| K13XW | TX | AKRON | CO | 13 |
| K14KL | TX | PLEASANT VALLEY | CO | 14 |
| K15FD | TX | HOLYOKE | CO | 15 |
| K16EJ | TX | PEETZ & N. LOGAN CTY | CO | 16 |
| K16ET | TX | PLEASANT VALLEY | CO | 16 |
| K17EU | TX | HOLYOKE | CO | 17 |
| K18FN | TX | PEETZ & N. LOGAN CTY | CO | 18 |
| K18GM | TX | PLEASANT VALLEY | CO | 18 |
| K19EG | TX | HOLYOKE | CO | 19 |
| K20FS | TX | PEETZ & N. LOGAN CTY | CO | 20 |
| K20GK | TX | PLEASANT VALLEY | CO | 20 |
| K21FF | TX | HOLYOKE | CO | 21 |
| K24FU | TX | PLEASANT VALLEY | CO | 24 |
| K25GZ | TX | HOLYOKE | CO | 25 |
| K26FM | TX | PEETZ & N. LOGAN CTY | CO | 26 |
| K26GX | TX | PLEASANT VALLEY | CO | 26 |
| K28FW | TX | PEETZ & N. LOGAN CTY | CO | 28 |
| K28IX | TX | PLEASANT VALLEY | CO | 28 |
| K29GI | TX | HOLYOKE | CO | 29 |
| K30FO | TX | PEETZ & N. LOGAN CTY | CO | 30 |
| K30GO | TX | PLEASANT VALLEY | CO | 30 |
| K30HA | TX | YUMA | CO | 30 |

TECHNICAL STATEMENT
CONCERNING OTHER TELEVISION SERVICES ANALYSIS
TELEVISION STATION KUPN-DT
STERLING, COLORADO
CHANNEL 23 1000 KW 402 M

Stations Considered in Analysis of Other Television Services

| Call Sign | Service | City of License | State | Channel |
|-----------|---------|----------------------|-------|---------|
| K31FZ | TX | HAXTUN | CO | 31 |
| K32EX | TX | PEETZ & N.LOGAN CTY | CO | 32 |
| K32AB | TX | YUMA | CO | 32 |
| K33FI | TX | AKRON | CO | 33 |
| K33GM | TX | HAXTUN | CO | 33 |
| K34AC | TX | YUMA | CO | 34 |
| K35FI | TX | AKRON | CO | 35 |
| K35GO | TX | HAXTUN | CO | 35 |
| K36AC | TX | YUMA | CO | 36 |
| K38AD | TX | YUMA | CO | 38 |
| K39HM | TX | HAXTUN | CO | 39 |
| K40CG | TX | YUMA | CO | 40 |
| K41EV | TX | AKRON | CO | 41 |
| K41IT | TX | HAXTUN | CO | 41 |
| K42GI | TX | YUMA | CO | 42 |
| K43FS | TX | AKRON | CO | 43 |
| K43JJ | TX | HAXTUN | CO | 43 |
| K44FL | TX | STERLING,S.LOGAN CTY | CO | 44 |
| K44FM | TX | WRAY | CO | 44 |
| K45FD | TX | ANTON & SW WASH CTY | CO | 45 |
| K46CY | TX | STERLING | CO | 46 |
| K46FF | TX | WRAY | CO | 46 |
| K47FT | TX | ANTON * SW WASH CTY | CO | 47 |
| K47JH | TX | JULESBURG | CO | 47 |
| K48DQ | TX | STERLING,S.LOGAN CTY | CO | 48 |
| K48GA | TX | WRAY | CO | 48 |
| K49EX | TX | ANTON & SW WASH CTY | CO | 49 |
| K49IN | TX | JULESBURG | CO | 49 |
| K50EE | TX | STERLING,S.LOGAN CTY | CO | 50 |
| K50FJ | TX | WRAY | CO | 50 |
| K51IL | TX | JULESBURG | CO | 51 |

Exhibit C

Region 1+ Translator Channel Chart

Logan County Television Translator System

Chart.dat
REGION 1+ TRANSLATOR DTV TRANSITION CHANNEL CHART

| | -----DENVER TV----- | | | | | | | | FM PRI KUNC |
|-----------|---------------------|-------------|-------------|-------------|-------------|-------------|--------------|-------------|-------------------|
| CHANNELS: | CB KWGN | CBS KCNC | PBS KRMA | ABC KMGH | NBC KUSA | FOX KDVR | MY20 KTVD | PBS KBDI | |
| NTSC: | 2 | 4 | 6 | 7 | 9 | 31 | 20 | 12 | |
| DIGITAL: | 34 | 35 | 18 | 17 | 16 | 32 | 19 | 38 | |
| FINAL: | 34 | 35 | 18 | 7 | 9 | 32 | 19 | 13 | 91.5 |
| AKRON | 33 | 35 | 8 | 41 | 43 | 11 | 13 | | |
| ANTON | 45 | 47 | 57 (22D) | 49 | 55 (24D) | | 39D% | 51D | |
| HAXTUN | 31 | 35 | 39 | 43 | 41 | 33 | | | |
| HOLYOKE | 15 | 17 | 19 | 21 | 25 | 29 | | 27D | 90.5 |
| IDLIA | 26 | 18 | 24 | 16 | 22 | 14 | 20 | 28 29D | |
| OVID | 47 | 49 | 51 | 53 | 55 | 57 | | 45D | 89.1 |
| PEETZ | 28 | 16 | 18 | 20 | 30 | 26 | 32& | 14D | |
| P. VALLEY | 14 | 16 | 18 | 20 | 30 | 26 | 28 | 24 24D | |
| STERLING | 44 | 46 | 50 | 48 | 56 | 52 | 58& | 31D | 90.9# |
| WRAY | 44 | 46 | 48 | 50 | 52 | 56 | 58 | 31D | 93.5 |
| YUMA | 32 | 34 | 36 | 40 | 38 | 42 | 30 | 28D | 88.7@ |

NOTES:

- xx CP on hand, need transmitter, license application not filed.
- (xx) Displacement change planned, CP not filed.
- [xx] Indicates 346 filed, CP not received (new or Modification).
- * STA
- % Move to Akron site?
- & Duplicating FOX until clean Denver 20 can be added.
- @ Licensed to KUNC, Region 1's 100W Amp, Joint Venture.
- # Sterling FM translator owned and operated by KUNC-FM.

Sterling 3 (KUPN) HDTV assignment is channel 23.

| CHANNEL | START | PRESENT TIME | | | CPs (Digital Flash Cuts) |
|------------|-------|--------------|---------|-------|--------------------------|
| SUMMARY: | 1993 | NTSC | DIGITAL | TOTAL | |
| Region 1 | 27 | 52 | 5 | = 57 | 3 |
| Logan | 16 | 14 | 2 | = 16 | 0 |
| Washington | 8 | 8 | 0 | = 8 | 0 |
| TOTAL | 51 | 74 | 7 | = 81 | 3 |

Logan County Home



Home

Contact Us

Logan County, Colorado

Logan County Television Translator System

Updated as of 05/30/07

No Outages to Report

Reirdon Hill

9.5 miles east of Sterling

| CHANNEL | DENVER | PROGRAMS | STATUS |
|---------|-------------------------------------|------------------------------------|---|
| 31 | 38 | PBS Denver 12 + 2 more programs | On-Air, Requires Digital Receiver |
| 44 | 2 | Denver 2 (CB) | On-Air |
| 46 | 4 | Denver 4 (CBS) | On-Air |
| 48 | 7 | Denver 7 (ABC) | On-Air |
| 50 | 6 | PBS Denver 6 | On-Air |
| 52 | 31 | Denver 31 (FOX) | On-Air |
| 54 | Off-Air permanently per FCC 6/05/07 | | |
| 56 | 9 | Denver 9 (NBC) | On-Air |
| | | | |

| | | | |
|----|----|-----------------|--------|
| 58 | 59 | Denver 59 (PAX) | On-Air |
|----|----|-----------------|--------|

Peetz Tower

7.5 miles Southwest of Peetz

| CHANNEL | DENVER | PROGRAMS | STATUS |
|---------|--------|------------------------------------|---|
| 14 | 38 | PBS Denver 12 + 2 more programs | On-Air 06/05/07, Requires Digital Receiver (Currently, rebroadcasting Denver 2) |
| 16 | 4 | Denver 4 (CBS) | On-Air |
| 18 | 6 | PBS Denver 6 | On-Air |
| 20 | 7 | Denver 7 (ABC) | On-Air |
| 26 | 59 | Denver 59 (PAX) | On-Air |
| 28 | 2 | Denver 2 (CB) | On-Air |
| 30 | 9 | Denver 9 (NBC) | On-Air |
| 32 | 31 | Denver 31 (FOX) | On-Air |

**The system is monitored and maintained by Mr. John Rietz of Yuma, Colorado.
We will post to this web site any notices of extended translator downtime.**

Exhibit D

Nielsen Universe Estimates of Cable and ADS Penetration

Universe Estimates
Media Related TV Households and Penetrations by County within DMA
TV HH Universe Estimates: January 1, 2008
Media Related Universe Estimates: May 2008
Used beginning April 24, 2008

Note : In some cases, these estimates are produced with small sample sizes and thus are subject to a high degree of sampling error. Small counties and those with low Cable and/or ADS penetration are subject to more variation than we are used to in our UEs.

Note : It is possible for a county's Metro status to change in the middle of the TV Season. The Metro Indicators shown below are as of the beginning of the 2007-2008 TV Season.

| DMA Code | DMA Name | State | NIMR County Code | County Name | County Size | Metro Indicator | TV HHs | Cable | | Cable and/or ADS | | ADS | | DBS | |
|----------|----------|-------|------------------|-------------|-------------|-----------------|---------|---------|-------|------------------|-------|--------|------|--------|------|
| | | | | | | | | HHs | % | HHs | % | HHs | % | HHs | % |
| 751 | Denver | CO | 05001 | ADAMS | B | M | 147,330 | 77,210 | 52.4 | 127,460 | 86.5 | 50,840 | 34.5 | 50,840 | 34.5 |
| 751 | Denver | CO | 05003 | ALAMOSA | D | | 5,570 | 1,600 | 28.7 | 4,590 | 82.4 | 2,990 | 53.7 | 2,990 | 53.7 |
| 751 | Denver | CO | 05005 | ARAPAHOE | B | M | 213,920 | 138,910 | 64.9 | 187,510 | 87.7 | 49,520 | 23.1 | 49,520 | 23.1 |
| 751 | Denver | CO | 05007 | ARCHULETA | D | | 4,660 | 540 | 11.6 | 4,310 | 92.5 | 3,820 | 82.0 | 3,820 | 82.0 |
| 751 | Denver | CO | 05013 | BOULDER | B | M | 108,860 | 71,700 | 65.9 | 95,230 | 87.5 | 24,000 | 22.0 | 24,000 | 22.0 |
| 751 | Denver | CO | 05014 | BROOMFIELD | B | M | 16,920 | 10,540 | 62.3 | 15,220 | 90.0 | 4,800 | 28.4 | 4,800 | 28.4 |
| 751 | Denver | CO | 05015 | CHAFFEE | D | | 6,860 | 3,230 | 47.1 | 6,030 | 87.9 | 2,800 | 40.8 | 2,800 | 40.8 |
| 751 | Denver | CO | 05017 | CHEYENNE | D | | 740 | 70 | 9.5 | 550 | 74.3 | 480 | 64.9 | 480 | 64.9 |
| 751 | Denver | CO | 05019 | CLEAR | D | M | 4,010 | 660 | 16.5 | 3,430 | 85.5 | 2,820 | 70.3 | 2,820 | 70.3 |
| 751 | Denver | CO | 05021 | CONEJOS | D | | 2,870 | 380 | 13.2 | 2,210 | 77.0 | 1,890 | 65.9 | 1,890 | 65.9 |
| 751 | Denver | CO | 05023 | COSTILLA | D | | 1,420 | 120 | 8.5 | 1,250 | 88.0 | 1,130 | 79.6 | 1,130 | 79.6 |
| 751 | Denver | CO | 05029 | DELTA | D | | 11,970 | 4,090 | 34.2 | 11,080 | 92.6 | 7,030 | 58.7 | 7,030 | 58.7 |
| 751 | Denver | CO | 05031 | DENVER | B | M | 239,860 | 150,200 | 62.6 | 194,120 | 80.9 | 45,620 | 19.0 | 41,440 | 17.3 |
| 751 | Denver | CO | 05033 | DOLORES | D | | 780 | 230 | 29.5 | 410 | 52.6 | 180 | 23.1 | 180 | 23.1 |
| 751 | Denver | CO | 05035 | DOUGLAS | B | M | 97,140 | 60,160 | 61.9 | 89,770 | 92.4 | 30,040 | 30.9 | 30,040 | 30.9 |
| 751 | Denver | CO | 05037 | EAGLE | D | | 17,070 | 8,950 | 52.4 | 16,840 | 98.7 | 8,410 | 49.3 | 8,410 | 49.3 |
| 751 | Denver | CO | 05039 | ELBERT | D | M | 7,810 | 250 | 3.2 | 6,490 | 83.1 | 6,240 | 79.9 | 6,240 | 79.9 |
| 751 | Denver | CO | 05045 | GARFIELD | D | | 19,090 | 7,650 | 40.1 | 17,940 | 94.0 | 10,540 | 55.2 | 10,540 | 55.2 |
| 751 | Denver | CO | 05047 | GILPIN | D | M | 2,080 | 0 | 0.0 | 1,720 | 82.7 | 1,720 | 82.7 | 1,720 | 82.7 |
| 751 | Denver | CO | 05049 | GRAND | D | | 5,520 | 2,300 | 41.7 | 5,340 | 96.7 | 3,100 | 56.2 | 3,100 | 56.2 |
| 751 | Denver | CO | 05051 | GUNNISON | D | | 5,380 | 1,210 | 22.5 | 4,640 | 86.2 | 3,470 | 64.5 | 3,470 | 64.5 |
| 751 | Denver | CO | 05053 | HINSDALE | D | | 400 | 400 | 100.0 | 400 | 100.0 | 0 | 0.0 | 0 | 0.0 |

| DMA Code | DMA Name | State | NMR County Code | County Name | County Size | Metro Indicator | TV HHS | Cable | | Cable and/or ADS | | ADS | | DBS | |
|----------|----------|-------|-----------------|-------------|-------------|-----------------|---------|---------|------|------------------|-------|--------|-------|--------|-------|
| | | | | | | | | HHS | % | HHS | % | HHS | % | HHS | % |
| 751 | Denver | CO | 05057 | JACKSON | D | | 570 | 130 | 22.8 | 570 | 100.0 | 480 | 84.2 | 480 | 84.2 |
| 751 | Denver | CO | 05059 | JEFFERSON | B | M | 209,000 | 121,750 | 58.3 | 175,150 | 83.8 | 54,060 | 25.9 | 54,060 | 25.9 |
| 751 | Denver | CO | 05063 | KIT CARSON | D | | 2,710 | 650 | 24.0 | 2,710 | 100.0 | 2,090 | 77.1 | 2,090 | 77.1 |
| 751 | Denver | CO | 05065 | LAKE | D | | 2,700 | 1,130 | 41.9 | 2,700 | 100.0 | 1,570 | 58.1 | 1,570 | 58.1 |
| 751 | Denver | CO | 05069 | LARIMER | C | | 108,470 | 54,410 | 50.2 | 94,520 | 87.1 | 40,340 | 37.2 | 40,340 | 37.2 |
| 751 | Denver | CO | 05073 | LINCOLN | D | | 1,770 | 220 | 12.4 | 1,770 | 100.0 | 1,640 | 92.7 | 1,640 | 92.7 |
| 751 | Denver | CO | 05075 | LOGAN | D | | 7,690 | 4,350 | 56.6 | 7,100 | 92.3 | 2,780 | 36.2 | 2,780 | 36.2 |
| 751 | Denver | CO | 05079 | MINERAL | D | | 380 | 80 | 21.1 | 320 | 84.2 | 250 | 65.8 | 250 | 65.8 |
| 751 | Denver | CO | 05081 | MOFFAT | D | | 5,020 | 2,340 | 46.6 | 4,830 | 96.2 | 2,490 | 49.6 | 2,490 | 49.6 |
| 751 | Denver | CO | 05087 | MORGAN | D | | 9,620 | 4,170 | 43.3 | 9,130 | 94.9 | 5,020 | 52.2 | 5,020 | 52.2 |
| 751 | Denver | CO | 05091 | OURAY | D | | 1,650 | 0 | 0.0 | 1,510 | 91.5 | 1,510 | 91.5 | 1,510 | 91.5 |
| 751 | Denver | CO | 05093 | PARK | D | M | 6,780 | 0 | 0.0 | 5,920 | 87.3 | 5,920 | 87.3 | 5,920 | 87.3 |
| 751 | Denver | CO | 05095 | PHILLIPS | D | | 1,790 | 650 | 36.3 | 1,700 | 95.0 | 1,090 | 60.9 | 1,090 | 60.9 |
| 751 | Denver | CO | 05097 | PITKIN | D | | 6,010 | 3,740 | 62.2 | 5,600 | 93.2 | 1,860 | 30.9 | 1,860 | 30.9 |
| 751 | Denver | CO | 05099 | PROWERS | D | | 4,910 | 2,550 | 51.9 | 4,910 | 100.0 | 2,550 | 51.9 | 2,550 | 51.9 |
| 751 | Denver | CO | 05103 | RIO BLANCO | D | | 2,430 | 430 | 17.7 | 2,220 | 91.4 | 1,830 | 75.3 | 1,830 | 75.3 |
| 751 | Denver | CO | 05105 | RIO | D | | 4,690 | 1,870 | 39.9 | 4,480 | 95.5 | 2,610 | 55.7 | 2,610 | 55.7 |
| 751 | Denver | CO | 05107 | ROUTT | D | | 8,670 | 4,310 | 49.7 | 8,350 | 96.3 | 4,270 | 49.3 | 4,270 | 49.3 |
| 751 | Denver | CO | 05109 | SAGUACHE | D | | 2,520 | 0 | 0.0 | 2,420 | 96.0 | 2,420 | 96.0 | 2,420 | 96.0 |
| 751 | Denver | CO | 05111 | SAN JUAN | D | | 280 | 0 | 0.0 | 280 | 100.0 | 280 | 100.0 | 280 | 100.0 |
| 751 | Denver | CO | 05113 | SAN MIGUEL | D | | 3,000 | 810 | 27.0 | 2,620 | 87.3 | 1,860 | 62.0 | 1,860 | 62.0 |
| 751 | Denver | CO | 05115 | SEDGWICK | D | | 1,090 | 180 | 16.5 | 1,090 | 100.0 | 910 | 83.5 | 910 | 83.5 |
| 751 | Denver | CO | 05117 | SUMMIT | D | | 9,850 | 6,350 | 64.5 | 9,500 | 96.4 | 3,150 | 32.0 | 3,150 | 32.0 |
| 751 | Denver | CO | 05121 | WASHINGT | D | | 1,850 | 60 | 3.2 | 1,620 | 87.6 | 1,560 | 84.3 | 1,560 | 84.3 |
| 751 | Denver | CO | 05123 | WELD | B | | 84,810 | 32,570 | 38.4 | 72,940 | 86.0 | 40,890 | 48.2 | 40,890 | 48.2 |
| 751 | Denver | CO | 05125 | YUMA | D | | 3,710 | 140 | 3.8 | 3,590 | 96.8 | 3,450 | 93.0 | 3,450 | 93.0 |
| 751 | Denver | NE | 26005 | ARTHUR | D | | 200 | 170 | 85.0 | 200 | 100.0 | 30 | 15.0 | 30 | 15.0 |
| 751 | Denver | NE | 26007 | BANNER | D | | 300 | 0 | 0.0 | 260 | 86.7 | 260 | 86.7 | 260 | 86.7 |
| 751 | Denver | NE | 26013 | BOX BUTTE | D | | 4,380 | 2,160 | 49.3 | 4,110 | 93.8 | 2,010 | 45.9 | 2,010 | 45.9 |
| 751 | Denver | NE | 26031 | CHERRY | D | | 2,460 | 130 | 5.3 | 2,200 | 89.4 | 2,090 | 85.0 | 2,090 | 85.0 |
| 751 | Denver | NE | 26033 | CHEYENNE | D | | 4,060 | 1,780 | 43.8 | 4,060 | 100.0 | 2,320 | 57.1 | 2,320 | 57.1 |
| 751 | Denver | NE | 26045 | DAWES | D | | 3,210 | 2,070 | 64.5 | 3,210 | 100.0 | 1,140 | 35.5 | 1,140 | 35.5 |
| 751 | Denver | NE | 26049 | DEUEL | D | | 900 | 570 | 63.3 | 900 | 100.0 | 330 | 36.7 | 330 | 36.7 |
| 751 | Denver | NE | 26069 | GARDEN | D | | 880 | 250 | 28.4 | 880 | 100.0 | 630 | 71.6 | 630 | 71.6 |

| DMA Code | DMA Name | State | NMR County Code | County Name | County Size | Metro Indicator | TV HHS | Cable | | Cable and/or ADS | | ADS | | DBS | |
|----------|----------|-------|-----------------|-------------|-------------|-----------------|--------|-------|------|------------------|-------|-------|------|-------|------|
| | | | | | | | | HHS | % | HHS | % | HHS | % | HHS | % |
| 751 | Denver | NE | 26075 | GRANT | D | | 290 | 0 | 0.0 | 130 | 44.8 | 130 | 44.8 | 130 | 44.8 |
| 751 | Denver | NE | 26091 | HOOKEER | D | | 290 | 10 | 3.4 | 270 | 93.1 | 260 | 89.7 | 260 | 89.7 |
| 751 | Denver | NE | 26101 | KEITH | D | | 3,460 | 2,030 | 58.7 | 3,090 | 89.3 | 1,190 | 34.4 | 1,190 | 34.4 |
| 751 | Denver | NE | 26105 | KIMBALL | D | | 1,590 | 790 | 49.7 | 1,590 | 100.0 | 800 | 50.3 | 800 | 50.3 |
| 751 | Denver | NE | 26161 | SHERIDAN | D | | 2,250 | 600 | 26.7 | 2,110 | 93.8 | 1,510 | 67.1 | 1,510 | 67.1 |
| 751 | Denver | WY | 49001 | ALBANY | D | | 11,790 | 6,200 | 52.6 | 10,240 | 86.9 | 4,100 | 34.8 | 4,100 | 34.8 |
| 751 | Denver | WY | 49005 | CAMPBELL | D | | 15,000 | 8,870 | 59.1 | 14,550 | 97.0 | 5,800 | 38.7 | 5,800 | 38.7 |
| 751 | Denver | WY | 49007 | CARBON | D | | 6,110 | 3,410 | 55.8 | 6,110 | 100.0 | 2,760 | 45.2 | 2,760 | 45.2 |
| 751 | Denver | WY | 49019 | JOHNSON | D | | 3,450 | 1,490 | 43.2 | 3,250 | 94.2 | 1,760 | 51.0 | 1,760 | 51.0 |
| 751 | Denver | WY | 49027 | NIORARA | D | | 870 | 200 | 23.0 | 870 | 100.0 | 670 | 77.0 | 670 | 77.0 |
| 751 | Denver | WY | 49031 | PLATTE | D | | 3,560 | 1,030 | 28.9 | 3,420 | 96.1 | 2,390 | 67.1 | 2,390 | 67.1 |

| | | | | | | | | | | | | | | | |
|-----|-----------|----|-------|----------|---|---|--------|-------|------|--------|-------|-------|------|-------|------|
| 722 | Lincoln & | KS | 15089 | JEWELL | D | | 1,490 | 740 | 49.7 | 1,280 | 85.9 | 540 | 36.2 | 540 | 36.2 |
| 722 | Lincoln & | KS | 15147 | PHILLIPS | D | | 2,170 | 1,290 | 59.4 | 2,060 | 94.9 | 790 | 36.4 | 790 | 36.4 |
| 722 | Lincoln & | KS | 15157 | REPUBLIC | D | | 2,070 | 1,080 | 52.2 | 1,980 | 95.7 | 910 | 44.0 | 910 | 44.0 |
| 722 | Lincoln & | KS | 15183 | SMITH | D | | 1,690 | 1,040 | 61.5 | 1,570 | 92.9 | 530 | 31.4 | 530 | 31.4 |
| 722 | Lincoln & | NE | 26001 | ADAMS | D | M | 12,950 | 6,180 | 47.7 | 11,060 | 85.4 | 4,900 | 37.8 | 4,500 | 34.7 |
| 722 | Lincoln & | NE | 26003 | ANTELOPE | D | | 2,670 | 760 | 28.5 | 2,350 | 88.0 | 1,600 | 59.9 | 1,600 | 59.9 |
| 722 | Lincoln & | NE | 26009 | BLAINE | D | | 190 | 80 | 42.1 | 190 | 100.0 | 110 | 57.9 | 110 | 57.9 |
| 722 | Lincoln & | NE | 26011 | BOONE | D | | 2,170 | 1,090 | 50.2 | 1,950 | 89.9 | 860 | 39.6 | 860 | 39.6 |
| 722 | Lincoln & | NE | 26015 | BOYD | D | | 870 | 170 | 19.5 | 770 | 88.5 | 630 | 72.4 | 630 | 72.4 |
| 722 | Lincoln & | NE | 26017 | BROWN | D | | 1,470 | 320 | 21.8 | 1,420 | 96.6 | 1,110 | 75.5 | 1,110 | 75.5 |
| 722 | Lincoln & | NE | 26019 | BUFFALO | D | M | 16,820 | 9,270 | 55.1 | 14,740 | 87.6 | 5,560 | 33.1 | 5,360 | 31.9 |
| 722 | Lincoln & | NE | 26023 | BUTLER | D | | 3,350 | 1,090 | 32.5 | 2,820 | 84.2 | 1,830 | 54.6 | 1,830 | 54.6 |
| 722 | Lincoln & | NE | 26029 | CHASE | D | | 1,590 | 780 | 49.1 | 1,370 | 86.2 | 630 | 39.6 | 630 | 39.6 |
| 722 | Lincoln & | NE | 26035 | CLAY | D | M | 2,490 | 1,130 | 45.4 | 1,850 | 74.3 | 730 | 29.3 | 730 | 29.3 |
| 722 | Lincoln & | NE | 26041 | CUSTER | D | | 4,540 | 2,230 | 49.1 | 4,270 | 94.1 | 2,110 | 46.5 | 2,110 | 46.5 |
| 722 | Lincoln & | NE | 26047 | DAWSON | D | | 8,790 | 5,000 | 56.9 | 8,070 | 91.8 | 3,130 | 35.6 | 3,060 | 34.8 |
| 722 | Lincoln & | NE | 26059 | FILLMORE | D | | 2,460 | 1,100 | 44.7 | 2,110 | 85.8 | 1,020 | 41.5 | 1,020 | 41.5 |
| 722 | Lincoln & | NE | 26061 | FRANKLIN | D | | 1,390 | 690 | 49.6 | 1,320 | 95.0 | 630 | 45.3 | 630 | 45.3 |
| 722 | Lincoln & | NE | 26063 | FRONTIER | D | | 990 | 550 | 55.6 | 880 | 88.9 | 330 | 33.3 | 330 | 33.3 |
| 722 | Lincoln & | NE | 26065 | FURNAS | D | | 2,080 | 880 | 42.3 | 1,940 | 93.3 | 1,060 | 51.0 | 1,060 | 51.0 |
| 722 | Lincoln & | NE | 26067 | GAGE | D | | 9,540 | 5,180 | 54.3 | 8,980 | 94.1 | 3,890 | 40.8 | 3,890 | 40.8 |
| 722 | Lincoln & | NE | 26071 | GARFIELD | D | | 790 | 330 | 41.8 | 700 | 88.6 | 370 | 46.8 | 370 | 46.8 |

| DMA Code | DMA Name | State | NMR County Code | County Name | County Size | Metro Indicator | TV HHS | Cable | | Cable and/or ADS | | ADS | | DBS | |
|----------|-----------|-------|-----------------|-------------|-------------|-----------------|---------|--------|------|------------------|-------|--------|------|--------|------|
| | | | | | | | | HHS | % | HHS | % | HHS | % | HHS | % |
| 722 | Lincoln & | NE | 26073 | GOSPER | D | | 790 | 280 | 35.4 | 690 | 87.3 | 410 | 51.9 | 410 | 51.9 |
| 722 | Lincoln & | NE | 26077 | GREELEY | D | | 990 | 360 | 36.4 | 880 | 88.9 | 560 | 56.6 | 560 | 56.6 |
| 722 | Lincoln & | NE | 26079 | HALL | D | M | 21,070 | 12,720 | 60.4 | 19,040 | 90.4 | 6,390 | 30.3 | 6,020 | 28.6 |
| 722 | Lincoln & | NE | 26081 | HAMILTON | D | | 3,560 | 2,070 | 58.1 | 3,170 | 89.0 | 1,120 | 31.5 | 1,090 | 30.6 |
| 722 | Lincoln & | NE | 26083 | HARLAN | D | | 1,390 | 540 | 38.8 | 1,280 | 92.1 | 740 | 53.2 | 740 | 53.2 |
| 722 | Lincoln & | NE | 26085 | HAYES | D | | 400 | 0 | 0.0 | 230 | 57.5 | 230 | 57.5 | 230 | 57.5 |
| 722 | Lincoln & | NE | 26087 | HITCHCOCK | D | | 1,190 | 200 | 16.8 | 870 | 73.1 | 670 | 56.3 | 670 | 56.3 |
| 722 | Lincoln & | NE | 26089 | HOLT | D | | 4,230 | 1,240 | 29.3 | 3,940 | 93.1 | 2,720 | 64.3 | 2,720 | 64.3 |
| 722 | Lincoln & | NE | 26093 | HOWARD | D | | 2,570 | 640 | 24.9 | 2,080 | 80.9 | 1,460 | 56.8 | 1,460 | 56.8 |
| 722 | Lincoln & | NE | 26095 | JEFFERSON | D | | 3,260 | 1,480 | 45.4 | 3,030 | 92.9 | 1,550 | 47.5 | 1,550 | 47.5 |
| 722 | Lincoln & | NE | 26099 | KEARNEY | D | M | 2,590 | 1,230 | 47.5 | 2,200 | 84.9 | 970 | 37.5 | 950 | 36.7 |
| 722 | Lincoln & | NE | 26103 | KEYA PAHA | D | | 390 | 70 | 17.9 | 320 | 82.1 | 250 | 64.1 | 250 | 64.1 |
| 722 | Lincoln & | NE | 26109 | LANCASTER | C | M | 108,030 | 79,170 | 73.3 | 96,560 | 89.4 | 17,820 | 16.5 | 17,600 | 16.3 |
| 722 | Lincoln & | NE | 26115 | LOUP | D | | 300 | 0 | 0.0 | 230 | 76.7 | 230 | 76.7 | 230 | 76.7 |
| 722 | Lincoln & | NE | 26121 | MERRICK | D | | 3,070 | 1,290 | 42.0 | 2,640 | 86.0 | 1,360 | 44.3 | 1,360 | 44.3 |
| 722 | Lincoln & | NE | 26125 | NANCE | D | | 1,490 | 790 | 53.0 | 1,390 | 93.3 | 610 | 40.9 | 610 | 40.9 |
| 722 | Lincoln & | NE | 26129 | NUCKOLLS | D | | 2,070 | 1,130 | 54.6 | 1,860 | 89.9 | 740 | 35.7 | 740 | 35.7 |
| 722 | Lincoln & | NE | 26133 | PAWNEE | D | | 1,170 | 470 | 40.2 | 1,020 | 87.2 | 550 | 47.0 | 550 | 47.0 |
| 722 | Lincoln & | NE | 26135 | PERKINS | D | | 1,190 | 580 | 48.7 | 1,070 | 89.9 | 520 | 43.7 | 520 | 43.7 |
| 722 | Lincoln & | NE | 26137 | PHELPS | D | | 3,670 | 1,890 | 51.5 | 2,980 | 81.2 | 1,130 | 30.8 | 1,100 | 30.0 |
| 722 | Lincoln & | NE | 26143 | POLK | D | | 2,090 | 840 | 40.2 | 1,880 | 90.0 | 1,060 | 50.7 | 1,060 | 50.7 |
| 722 | Lincoln & | NE | 26145 | RED | D | | 4,340 | 2,190 | 50.5 | 4,110 | 94.7 | 1,920 | 44.2 | 1,920 | 44.2 |
| 722 | Lincoln & | NE | 26149 | ROCK | D | | 700 | 180 | 25.7 | 630 | 90.0 | 450 | 64.3 | 450 | 64.3 |
| 722 | Lincoln & | NE | 26151 | SALINE | D | | 5,260 | 2,330 | 44.3 | 4,500 | 85.6 | 2,230 | 42.4 | 2,230 | 42.4 |
| 722 | Lincoln & | NE | 26159 | SEWARD | D | M | 6,110 | 2,290 | 37.5 | 5,190 | 84.9 | 2,930 | 48.0 | 2,930 | 48.0 |
| 722 | Lincoln & | NE | 26163 | SHERMAN | D | | 1,280 | 200 | 15.6 | 1,030 | 80.5 | 830 | 64.8 | 830 | 64.8 |
| 722 | Lincoln & | NE | 26169 | THAYER | D | | 2,190 | 780 | 35.6 | 1,660 | 75.8 | 880 | 40.2 | 880 | 40.2 |
| 722 | Lincoln & | NE | 26175 | VALLEY | D | | 1,770 | 740 | 41.8 | 1,620 | 91.5 | 880 | 49.7 | 880 | 49.7 |
| 722 | Lincoln & | NE | 26181 | WEBSTER | D | | 1,480 | 680 | 45.9 | 1,240 | 83.8 | 560 | 37.8 | 560 | 37.8 |
| 722 | Lincoln & | NE | 26183 | WHEELER | D | | 300 | 0 | 0.0 | 280 | 93.3 | 280 | 93.3 | 280 | 93.3 |
| 722 | Lincoln & | NE | 26185 | YORK | D | | 5,760 | 3,440 | 59.7 | 5,110 | 88.7 | 1,690 | 29.3 | 1,690 | 29.3 |
| 678 | Wichita- | NE | 26057 | DUNDY | D | | 880 | 560 | 63.6 | 880 | 100.0 | 320 | 36.4 | 320 | 36.4 |

Exhibit E

E-mail from Nielsen Account Executive
to KUPN General Manager

From: Lich, Robert D. [mailto:Robert.Lich@nielsen.com]

Sent: Tuesday, July 15, 2008 2:35 PM

To: Greg Armstrong

Subject: RE: Contact

Hi Greg,

Thank you for the opportunity to provide rating service to KUPN in Denver. Unfortunately, KUPN has not achieved enough viewing to be included in our overnight or our cume (unduplicated audience) analyses. Due to the lack of reportability, I suggest we revisit the possibility of an agreement when KUPN achieves viewing levels that will help you grow the business.

Per your request for media related penetration universe estimates, I can provide the Denver and Lincoln/Hastings/Kearny plus Dundy County (currently in the Wichita/Hutchinson DMA for the non-client price of \$1,000. The May 2008 survey will contain households and percentages for each county in these DMAs for all types of receivability.

Please approve the \$1,000 cost and I will send the information today. The invoice will be sent to the PO Box office you provided below.

Thank you, Robb

Robert Lich ● Senior Account Executive ● T: 323-817-1222 ●

Robert.Lich@Nielsen.com

The Nielsen Company ● 6255 Sunset Blvd. ● Los Angeles, CA 90028
