

Before the
Federal Communications Commission
Washington, D.C. 20554

In re Application of)
)
PMCM TV, LLC) File No. BPCDT-20130528AJP
)
For Minor Modification of the License for)
KVVN(TV), Facility ID Number 86537,)
Middletown Township, New Jersey)
)

ACCEPTED/FILED

Directed to: Office of the Secretary
Attention: Chief, Video Division, Media Bureau

AUG - 8 2014
Federal Communications Commission
Office of the Secretary

Alternative PSIP Proposal

PMCM TV, LLC

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August 8, 2014

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Summary

PMCM TV, LLC ("PMCM") submits its analysis of the PSIP/cable channel carriage issue that has arisen in the captioned case. The analysis takes into account the discussion among the parties at a July 31, 2014 meeting convened by the staff to discuss the matter, as well as a survey of the PSIP allocation guidelines and the statutory and regulatory mandates requiring cable carriage on a station's "over-the-air" channel.

Based on this review, PMCM proposes a PSIP assignment that accommodates Meredith Broadcasting's concerns about perceived over the air and cable carriage impacts on its existing service. The combination of major channel 3 and minor channel 10 *et seq.* fully meets the requirements of ATSC A/65 Annex B for over the air reception issues (to the extent that there actually are any such issues given the lack of over the air viewership in Fairfield County), and PMCM's agreement to rescind its demand for cable carriage on Channel 3 in Fairfield County eliminates any issues regarding conflicting demands for channel 3.

PMCM also stresses the statutory and regulatory imperatives that give commercial TV stations the right to cable carriage on their actual over-the-air channels. The proposal set forth largely meets those requirements.

The proposal also takes into account the unique circumstances of KVVU's allocation to New Jersey as a VHF channel pursuant to a court order, a remedial measure that would be largely undercut by relegation to a non-VHF cable channel position.

Finally, PMCM offers an alternative PSIP/cable channel carriage assignment which would less effectively permit service to begin both on the air and on cable. This alternative would have PMCM accept major channel 14 as its PSIP but would also require an order mandating cable carriage on Channel 3, except in Fairfield County.

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Alternative PSIP Proposal

PMCM TV, LLC believes that the meeting among the Bureau staff and the parties last week was a constructive airing of the issues related to PSIP assignment for KVVV. While we disagree with some of the positions taken by the staff, we have taken into consideration the discussion in order to come up with a PSIP/channel carriage plan that would meet our needs, should address the concerns of Meredith Broadcasting, and would be consistent with the Bureau's thinking as we could divine it. The problem presented is to fashion a solution that maintains the integrity of the PSIP assignment protocols as enunciated in Annex B of ATSC A/65 while also complying with the bluntly stated will of Congress and the Commission that stations have the right to be carried by cable systems on their "over-the-air" channel.

As we understand it, the Bureau believes that Annex B requires that there be no overlap of the DTV Service Areas of television stations with the same major channel number in their

two-part virtual PSIP channels without the consent of other overlapping users of that major channel number. Ordinarily that policy would prevent Station KVVN(TV) from using its over-the-air RF Channel 3 as its major channel number for PSIP purposes, thereby preventing it from demanding cable carriage on its over-the-air channel, as authorized and contemplated by the statute and the rules.

At the outset, we note that the situation presented here, while not unique, is one where two overlapping stations have the right to major channel 3 in their PSIP by operation of Annex B of ATSC A/65. Paragraph (1) of Section B.1.1 of the Annex calls for the assignment of the NTSC RF channel number as the major channel number to a station which was operating on that channel at the time of its digital conversion. This paragraph, by its terms, applies to both KVVN and WFSB. We do not believe that Paragraph (4) of Section B.1.1 applies here because the application of that provision (which could be argued to cause the assignment of channel 33 to KVVN) is limited by its terms to situations where a channel is allotted to a "market" where the same major channel was previously assigned. The key here is market allotment. Everywhere else in Annex B the text refers explicitly to overlapping DTV Service Areas when it is referring to areas where there is signal overlap. In Paragraph 4, however, it uniquely refers to a "market," which must be presumed to have a different meaning than overlapping DTV Service Areas. As recently as August 6, the Media Bureau issued an Order indicating that a commercial TV station's "market" is its "designated market area" or DMA as defined by Nielsen.¹ This definition of a TV station's market is used consistently throughout the rules when the "market" (as opposed to signal contour coverage) is what is intended. In the present context, this makes perfect sense since it would be flatly erroneous on every possible factual level to say that a

¹ *Pine Telephone, Inc.*, DA 14-1142, re. August 6, 2014.

station in Hartford, CT in the Hartford DMA with its own nexus of local competitors, local advertising opportunities, local market conditions, and local programming needs is in the same "market" as a station in Middletown Township, NJ, which is separated from Connecticut by an entire state, is in a different DMA, and faces an entirely different matrix of competitive and business issues from the Hartford market. In no other instance does the Commission equate a "market" with partly overlapping service areas and it should not do so here.

It is also important in this context to note that Paragraph 4 expressly applies to the market where a channel is "allotted" -- not where its signal contours run. Reference to the table of allotments in Part 73.622 quickly confirms that WFSB's channel 3 was "allotted" to Hartford, CT which is in the Hartford DMA while KVVN's channel 3 is allotted to Middletown Township, NJ in the New York DMA. The use of "allotment" in the text confirms that the DMA of allotment rather than overlapping service areas was what was contemplated.²

Proposed Solution

How then do we reconcile the apparent Annex B prohibition on overlapping identical PSIPs with application of the subordinate paragraphs in Annex B which result in two overlapping stations having the same major channel? The staff indicated at the meeting that it would entertain a proposal to resolve this problem. Our proposal is that Station KVVN(TV) simply be assigned the two-part virtual PSIP channel 3.10 (with any additional KVVN program streams that may eventually be transmitted to be identified as 3.11, 3.12, etc.) while WFSB would retain PSIP channel 3.1 through 3.9.

² We also note in this connection that Channel 33 does not fall within the basic broadcast channel tier of the cable operators in the New York DMA. To be placed in each cable system's basic tier (see 614(b)(7) and 76.57(f)) KVVN would have to be placed elsewhere in each cable channel line-up with confusingly different channel designations in different cities and counties.

The advantages of this proposal are several.

Compliance with Annex B

First, it would be completely consistent with Annex B of ATSC A/65 which guarantees only that the “*two-part channel number combinations* used by a licensee will be different from those used by any other licensee with an overlapping DTV Service Area.” (Emphasis added.)³ Nothing in Annex B – or anywhere else that we’re aware of – precludes overlapping television signals with different two-part channel numbers, *i.e.*, where the overlapping stations share a common major channel number but have distinct minor channel numbers. To confirm this we have consulted with a number of experts knowledgeable about the PSIP assignment process and its effects, including Dr. Richard Chernock, the chairman of the ATSC. Dr. Chernock himself suggested the very approach proposed here as a solution which would obviate any PSIP problem. All agree that this approach would be consistent with ATSC A/65 *and* that there would be no confusion of the TV receiver by such a PSIP assignment. We invite the Commission to check with Dr. Chernock to verify our findings.

Our conclusion is, of course, confirmed in the laboratory of the real world. As we mentioned during the meeting, the Commission has *already* authorized multiple situations involving overlapping *identical* (*i.e.*, both major channel and minor channel numbers) PSIPs for stations serving millions of households. To the best of our knowledge, no adverse effects have occurred in any of those situations.⁴ That circumstance, repeated over and over in numerous parts of the country, demonstrates compellingly that the prophylactic mandate of the preamble to

³ Major channel numbers are to be uniquely assigned in different regions (defined as countries) under the ATSC.

⁴ There is no simple way to identify how many instances of overlapping identical PSIPs exist. Besides the situations in Louisiana-Arkansas-Mississippi (non-commonly owned stations KSLA, KETZ and WJTV all share virtual channel 12.1), in Nevada, and in New Jersey which we mentioned at the meeting, there are overlaps of full power and class A stations with identical PSIPs in Detroit and Chicago. (See attachments A, B, and C). In no case are we aware of any problem arising.

Annex B may be unnecessary – but we do not propose here to take issue with that. We note those circumstances simply to assure the Commission that (a) there is ample precedent for overlapping major channel PSIPs and (b) there need be no fear of any adverse consequences if our proposal is adopted. If overlapping identical PSIPs can co-exist in peace, non-identical overlapping PSIPs are even more secure.

By adding a separate and distinct minor channel, the Commission would – in full compliance with ATSC A/65 – eliminate any identical overlap at all with any other station already broadcasting with a PSIP that includes major channel 3. This would permit Meredith full flexibility to add new subchannels without a viewer even once having to spend the nanosecond necessary to scroll through PMCM's channels. Under this PSIP arrangement, WFSB will always come up as the first viewer choice for channel 3 in the limited areas where it can be received over the air, so there is no detriment whatsoever to WFSB's access to channel 3 vs. that of other competing stations in its market. Although the real world facts suggest that assignment of a much higher minor channel (*e.g.*, 3.10) is an unnecessary precaution, PMCM would accept that limitation in order to avoid any conceivable overlap of identical two-part channel number PSIPs. And, since ATSC A/65 guarantees freedom from overlap of *two-part* channel numbers, compliance with the PSIP protocol would be achieved.

We observe that nothing in Annex B requires the consent of other common major channel users when the two part PSIP is not identical. Because the two part PSIP combination is recognized as distinct from any other overlapping PSIP in the service area, no confusion can arise. To be sure, Paragraph 5 of Annex B permits co-owned stations to deviate from the usual PSIP assignment rules by voluntarily sharing the same major channel number, but it then prescribes that any potential confusion be eliminated by exactly the approach proposed here:

assigning distinct minor channel numbers. We must emphasize again that nothing in Annex B prevents overlapping major channel numbers as long as the minor channel numbers are different. The system is designed to accommodate that very eventuality.⁵

The Bureau's concern with overlapping PSIPs here is especially curious since WFSB's channel 33 RF signal contour is substantially short-spaced to WCBS's channel 33 contour. See Attachment D⁶. The digital service contour overlap of these two stations embraces a huge area in south-central Connecticut and results in destructive interference to some 147,534 households and 381,414 people within the WFSB service contour in Fairfield County alone. This Commission-mandated RF overlap perhaps explains why over-the-air reception of WFSB in Fairfield County is virtually non-existent. Moreover, when analyzed with the assumption of a typical consumer antenna, there is no PSIP overlap at all. Recent data indicate that the cable and satellite penetration rate in Fairfield County is among the highest in the United States -- 92%. Accordingly, from a practical standpoint, the over-the-air viewership of WFSB is a non-factor in resolving the PSIP issue. The RF channel 33 DTV assignments already prevent most potential WFSB viewers in the overlap area from receiving a WFSB signal. And those that *can* receive a signal would have to use a high gain antenna oriented toward Hartford -- directly in the opposite direction from KVVN -- so that KVVN's signal would not be picked up at all. In other words, even if overlapping major channel PSIPs were a theoretical issue, which they are not, over-the-air viewers would not be substantively affected.

⁵ The solution proposed here would also eliminate any possibility of adverse effect on the Channel 3 PSIP user in Philadelphia.

⁶ A narrative explaining exhibit D-2 will be submitted Monday.

The Need to Protect Over-the-Air Carriage Rights

Designation of PSIP channel 3.10 would also protect the other critical value at stake here: PMCM's unqualified right to demand cable carriage on its over-the-air channel. The importance of this unambiguous mandate cannot be overemphasized:

a. Section 614 (B)(6) of the Communications Act, as the Commission has repeatedly acknowledged, expressly requires that signals carried in fulfillment of the must carry obligations set forth in the Act "shall be carried on the cable system channel number on which the local commercial television station is broadcast over the air..." The statute could not be clearer.

b. The Commission's own cable carriage rules duly implement Section 614(B)(6) of the Act by also requiring that "a cable operator shall carry [a must carry] signal on the cable system channel number on which the local commercial television station is broadcast over the air..." 47 C.F.R. 76.57(a)

c. In interpreting the must carry obligations of cable operators under Section 614 in the digital environment, the Commission in 2008 reaffirmed that "the channel placement options in Sections 614(b)(6) and 615(g)(5), as implemented in Section 76.57 of the Commission's rules, remain in effect after the digital transition."⁷ The right of a commercial television station to be carried on the same channel number on which the station is broadcast over the air thus remains an option, as both the statute and the rule explicitly require. The Commission also clarified that stations "may" demand carriage on their major channel number as broadcast in the station's PSIP, but it did not require them to do so. *Id.* at 14258. Nothing here

⁷ *Carriage of Digital Television Broadcast Signal: Amendment to Part 76 of the Commission's Rules*, 23 FCC Rcd. 14254, 14257 (2008).

mandates or even suggests that the statutorily mandated over-the-air channel option has been abandoned.

Several years earlier, in the *First Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Carriage of Digital Television Broadcast Signals*, 16 FCC Rcd. 2598, 2635 (2001), the Commission had indicated that digital channel position requirements were unnecessary since digital technology would map the broadcast channel to the PSIP. This "technology-based" solution, the Commission said, resolved broadcaster concerns that they would not be carried on their over-the-air channel as required in the analog regime. At the same time, the Commission indicated that in the digital environment, "there is no analogous supporting rationale for requiring digital channel positioning on any cable channel other than on a station's over-the-air channel." *Ibid.* at 2633, footnote 235. The Commission accordingly modified Section 76.57(c) of the rules to require a cable operator "to carry the information necessary to identify and tune to the broadcast television signal." Again, nothing here suggests that mandatory carriage on the over-the-air channel is no longer operative. The opposite, rather, appears to be true.

We understand that the Bureau has recently suggested in several orders that cable carriage on one's over-the-air channel may no longer be a right.⁸ Given clear and express statutory language and numerous Commission pronouncements all to the contrary, we do not need to address those decisions here, but it is inconceivable that one's "over-the-air" channel, as

⁸ See, for example, *KSQA, L.L.C. v. Cox Cable Communications, Inc.*, 27 FCC Rcd 13185 (Policy Div. 2012). See also *Gray Television Licensee, LLC*, 28 FCC Rcd 10780 (Policy Div. 2013); *America-CV Station Group, Inc.*, 28 FCC Rcd 29 (Policy Div. 2013); *Mauna Kea Broadcasting Company*, 27 FCC Rcd 13188 (Policy Div. 2012). We do note, however, that the Bureau in the KSQA case appears to have misread the Commission's 2008 declaration that broadcast channels are no longer identified by reference to their over the air radio frequencies. The KSQA Order incorrectly states that the Commission declared that "a station's over-the-air broadcast channel number" is no longer so identified. The Commission said no such thing, nor could it have in view of the statutory mandate.

protected by both the statute and the rules, could be anything other than one's over-the-air channel as identified in the table of allotments. Part 73, Sections 601 *et. seq.* of the Commission's rules consistently identify over the air channel numbers by the numbers designated in the allotment tables and their associated radio frequencies. KVVN's allotted over-the-air channel number is there designated as channel 3. To identify KVVN's over the air channel number as anything but channel 3 would not only contravene the statute (and the implementing rule) directly, but would also be administrative doublespeak of the highest order. Such a reading would literally read the words "over the air" out of the statute.

d. While the Cable Carriage Act, rule 76.57(a), and the 2008 Declaratory Ruling all unanimously guarantee the right of a TV station to demand carriage on its over the air channel, PMCM is willing to forego its right to cable carriage on channel 3 on the Fairfield County cable systems so long as WFSB operates on channel 3 there. This concession is offered in the interest of resolving this issue with the least disruption to incumbent stations with must carry rights to channel 3. Upon confirmation of KVVN's right to major channel 3 PSIP, we would immediately amend our must carry demand on the Fairfield County cable systems to demand carriage elsewhere in the basic channel tier.

Section 331

In addition to the integrity of the PSIP rules and the absolute preference in the statute and rules for over-the-air channel placement, there is a third important value at stake here. It cannot be ignored that KVVN came to the New Jersey market by virtue of an extraordinary Act of Congress that mandated the allotment of a VHF channel to New Jersey. Section 331 speaks in terms of reallocating a VHF *channel* to an unserved state by operation of the law. At the time Section 331 was adopted, of course, one's over-the-air channel was the same as its receiver dial

position. To reallocate Channel 3 to New Jersey but to then strip it of the panoply of rights associated with that channel under the Cable Carriage Act might well be viewed as not only contravening the purpose of Section 331 (again) but also as deliberately, perhaps even contemptuously, thwarting the mandate of the court. At the very least, the Commission should be sensitive to the objective of the statute in ensuring that the people of the state have access to a VHF channel that can compete with the VHF channels in nearby states, not only over the air but on the cable systems over which much of the viewership occurs.

An Alternative to Assignment of PSIP 3.10

As an alternative, but less desirable, proposal, PMCM would not object to the staff's suggestion that KVVN's major channel number be designated as 14 in its PSIP, *provided* the Commission also specifies that KVVN would be entitled to cable carriage on channel 3 throughout the New York DMA except Fairfield County. Since cable position is not dependent on broadcast PSIPs, the Commission may require on-channel carriage regardless of the assigned PSIP and, indeed, under this approach the Commission would have to expressly impose that requirement in order to comply with Section 614(b)(6) of the Act. Again, PMCM would agree in this context to modify its demand for carriage on Channel 3 in Fairfield County, and instead demand carriage in that County on Channel 14 or another channel mutually agreed to with the cable operators. It would also waive any right to cable carriage on Channel 3 outside the New York DMA.

This alternative approach, like our first proposal, would eliminate any concerns regarding overlapping PSIPs which either Meredith or the Channel 3 user in Philadelphia might have had. The PSIP Channel 14/guaranteed carriage on Channel 3 option is decidedly not our preferred choice since it means that over-the-air viewers would pick KVVN up on Channel 14, thus

diminishing the practical effect of having a new VHF station in New Jersey. We are nevertheless willing to accept this PSIP as long as the Commission expressly provides, in connection with the designation of major channel number 14 for KVVN, that PMCM would retain its right to demand cable carriage on its over-the-air Channel 3. PMCM would reserve the right, however, to have its PSIP conformed to its over-the-air Channel 3 in the event the Commission clarifies the governing rules to permit such an assignment.

Contingent Waiver Request

To the extent that either of the proposals set forth above might be deemed in any way inconsistent with the Commission's rules or the ATSC standards – and, as noted above, PMCM believes that there is no such inconsistency – PMCM hereby requests waiver of the pertinent rule so as to effectuate the on-channel carriage mandate of the Act and avoid any duplication of PSIPs.

Conclusion

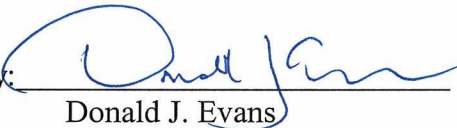
The above proposal is a good faith effort to accommodate the needs and interests of Meredith⁹ and the staff's understanding of the PSIP assignment rules. Our purpose here is to reach a practical solution that should work to substantially accomplish the mandates of the Cable Carriage Act, the Commission's rules, ATSC A/65 and Section 331. In our view, through the simple assignment of PSIP 3.10 to KVVN, the concerns raised by Meredith can be resolved satisfactorily in a manner which is consistent with the mandates of the Act, the rules, ATSC A/65 and full Commission precedent. By assuring PMCM its statutory right to assert carriage on its over-the-air broadcast channel, the Commission would also be advancing Congress's intent, as

⁹ We do not here address the position of ION. If ION's facially unlawful channel placement agreement with Cablevision is pressed, those parties would have to deal with that at a later point.

expressed in Section 331 of the Act, to ensure that New Jersey has its own VHF channel enjoying the same over-the-air and cable carriage rights as other equivalent VHF stations.

Finally, PMCM requests that the Bureau ordain, consistent with the normal mechanics of Section 1.103 of its rules, that the PSIP and on-channel carriage determination made consistent with PMCM's proposal herein be made effective immediately, irrespective of, but obviously subject to, any subsequent reconsideration or review that might be sought.

Respectfully submitted,
PMCM TV, LLC

By: 
Donald J. Evans
Its Attorney

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August 8, 2014

ATTACHMENT A

Contour Overlap Area

WHTV-DT (34): FCC F(50-90) 41.00 dBu
WDWO-CD-DT (18): FCC F(50-90) 51.00 dBu
Total Population: 2,909,674
Housing Units: 1,281,597

DMA Overlap Areas - PSIP CH 18

WDWO-CD-DT / To Detroit DMA (Overlap with Full Service)
Total Population: 2,909,124
Housing Units: 1,281,410

PSIP OVERLAP TO DETROIT DMA CLASS A TO FULL SERVICE

DIGITAL SERVICE CONTOURS

LICENSED OR AUTHORIZED FACILITIES
PSIP CHANNEL 18

DIGITAL SERVICE OVERLAPS
AT LICENSED POWERS AND HAATS

WDWO-CD-DT

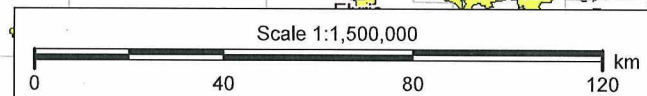
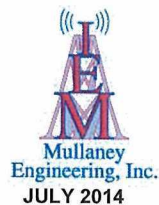
BLDTA20130108ABZ
FCC Facility ID: 68444
Latitude: 42-29-01 N
Longitude: 083-18-44 W
ERP: 14.00 kW
RF Channel: 28
PSIP Channel: 18

DMA OVERLAP AREA (GREEN)

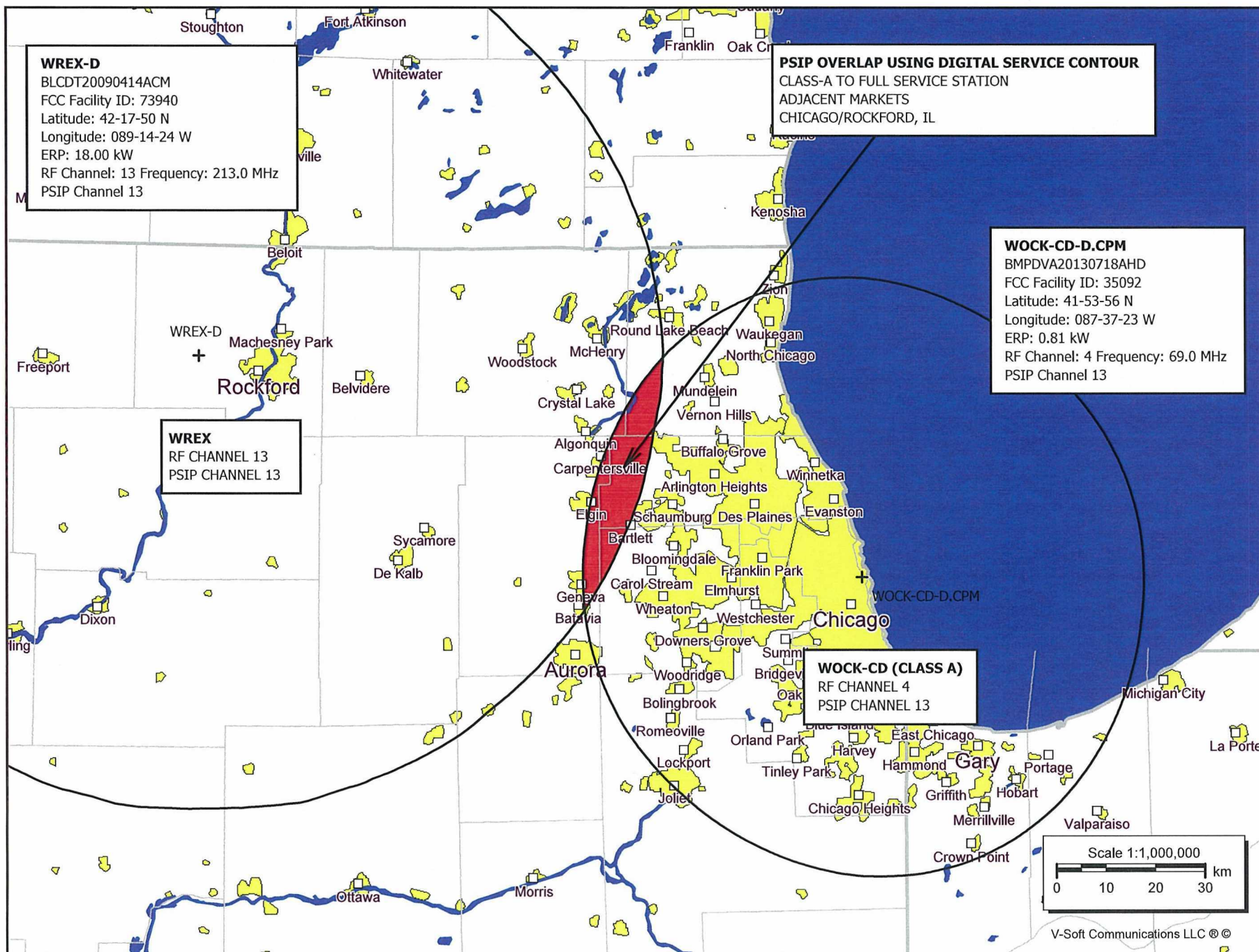
DETROIT DMA = GREEN + AQUA COLORED COUNTIES

WHTV-DT

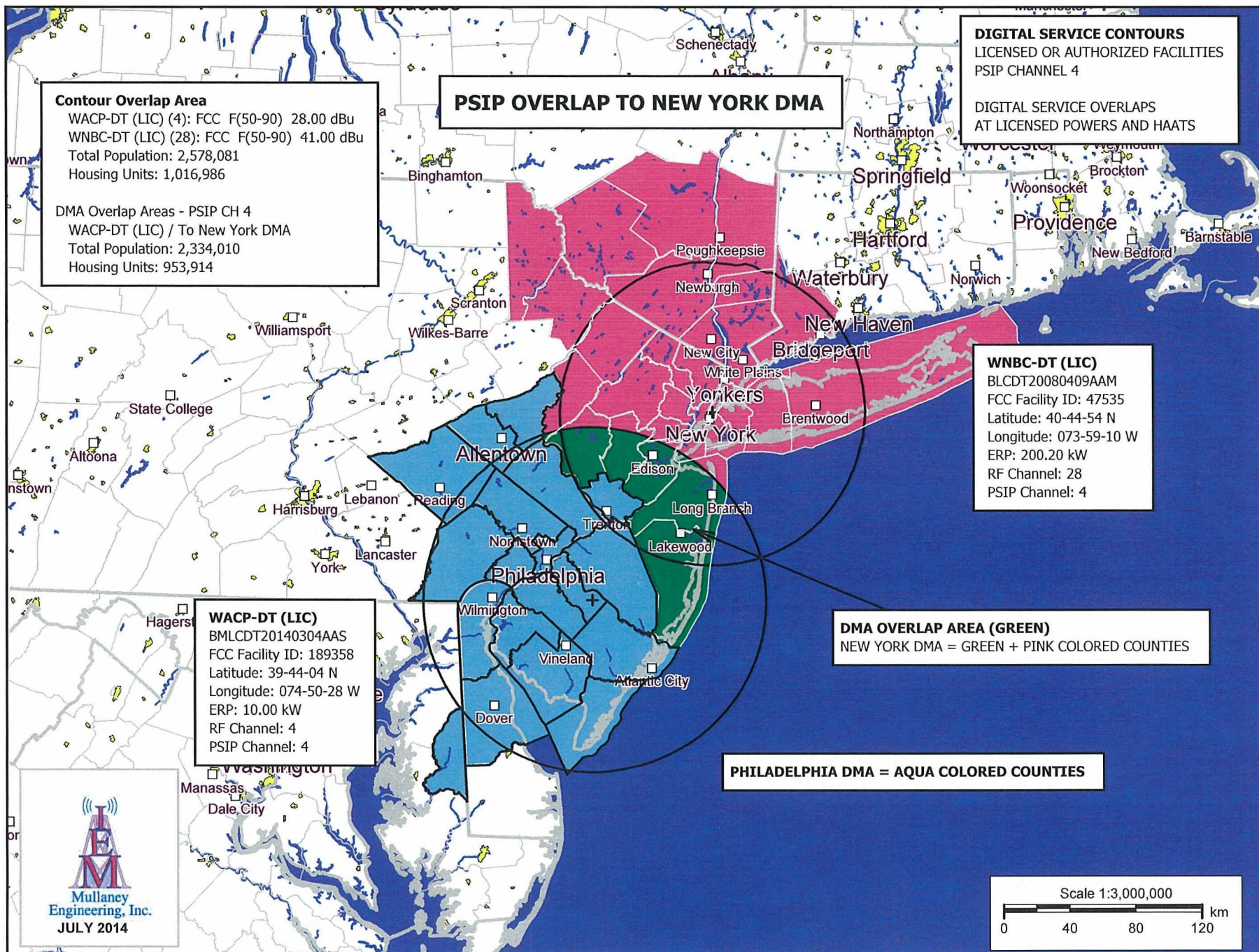
BLCDT20130927AWH
FCC Facility ID: 29706
Latitude: 42-22-25 N
Longitude: 084-04-10 W
ERP: 185.00 kW
RF Channel: 34
PSIP Channel: 18



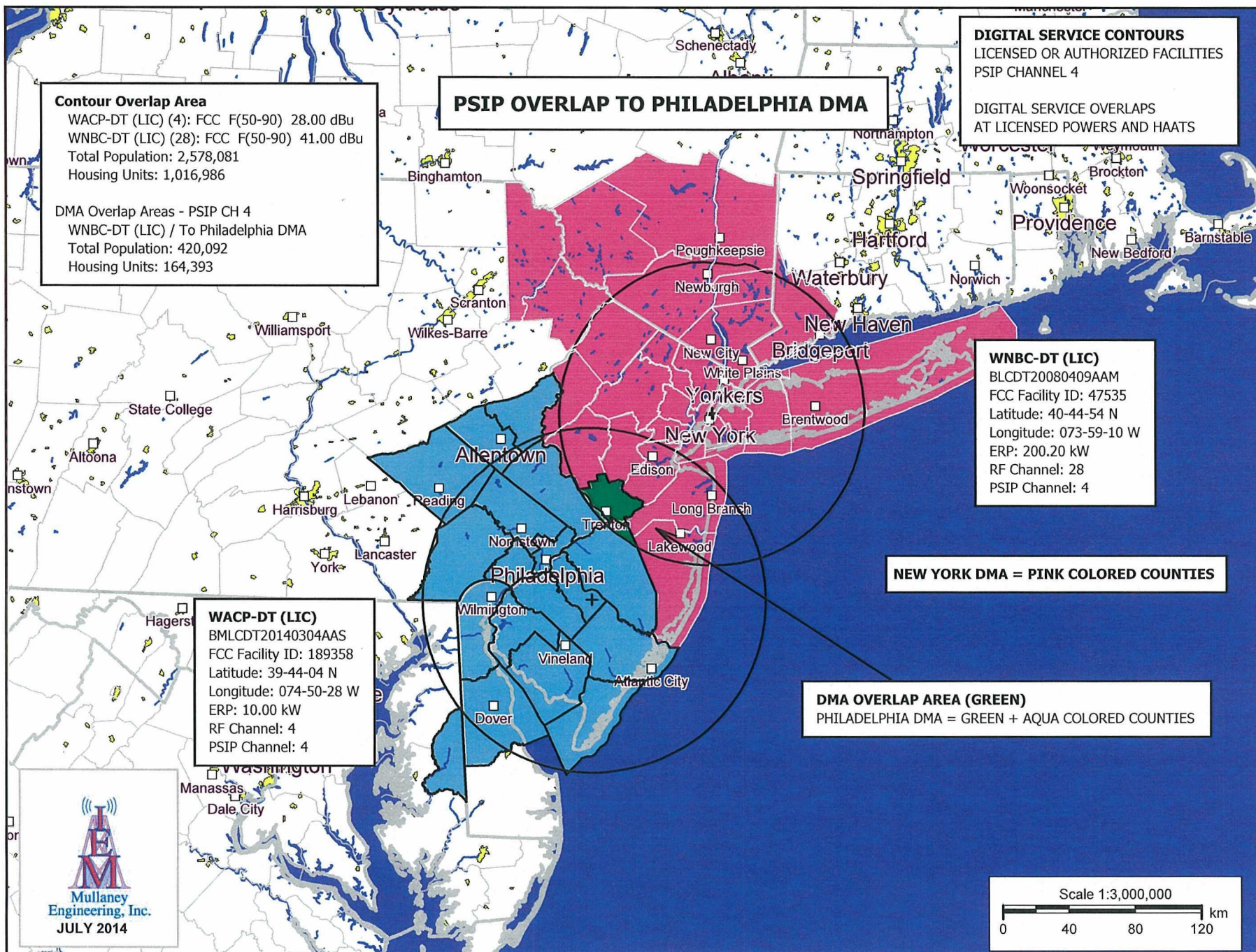
ATTACHMENT B



ATTACHMENT C-1



ATTACHMENT C-2



ATTACHMENT D

TV Outgoing Interference Study

Signal Resolution: 1.0 km
Consider NTSC Taboo: Yes
KWX error points are considered to be interference free coverage.
Default # of radials computed for contours: 360
Contours calculated using 8 radial HAAT.
LR Profile Spacing Increment: 1.0 km
Masked interference points are being counted as interference.
Pop Centroid DB: 2010 US Census (PL)

Study Date: 8/6/2014
TV Database Date: 8/6/2014

WFSB-DT (LIC)

BLCDT20041029AIL
FCC Facility ID: 53115
ERP: 1000.00 kW
RF Channel: 33 Frequency: 587.0 MHz
PSIP Channel: 3

RF CO-CHANNEL STUDY CHANNEL 33

OVER-THE-AIR INTERFERENCE TO WFSB-DT (HARTFORD)
FROM CO-CHANNEL WCBS-TV (NEW YORK)

DIGITAL SERVICE CONTOURS

FCC 41 DBU F(50,90)

WFSB-DT - FCC 41 dBu Protected Service Contour

Red areas are study cell locations predicted to receive interference from co-channel WCBS-TV (New York) - OET Bulletin 69 Method

WCBS-TV-DT (LIC)

BLCDT20090612AFN
FCC Facility ID: 9610
ERP: 284.00 kW
RF Channel: 33 Frequency: 587.0 MHz
PSIP Channel: 2

WFSB-DT RF Channel 33 Service to Fairfield CT (County) Only

Population (2010)	Households	Population
WFSB-DT (Service)	247,954	640,015
WCBS-TV (Interference to WFSB)	(147,534)	(381,414)

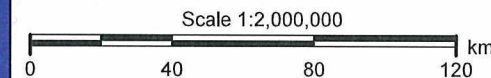
SERVICE TO FAIRFIELD COUNTY

WFSB-DT Interference Free Service:	100,420	258,601
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Service & Interference Based on OET Bulletin 69



Mullaney
Engineering, Inc.
AUGUST 2014



OVER-THE-AIR STUDY

The focus of this study is Fairfield County Connecticut only.

The population/households numbers were computed using the methods provided for in OET Bulletin Number 60 (Longley-Rice prediction method).

The numbers are:

WFSB-DT RF Channel 33 Service to Fairfield CT (County) Only

Population (2010)	Households	Population	
WFSB-DT (Service)	247,954	640,015	- Baseline service in Fairfield County
WCBS-TV (Interference to WFSB)	(147,534)	(381,414)	- Interference to the baseline service

SERVICE TO FAIRFIELD COUNTY

WFSB-DT Interference Free Service: 100,420 258,601 - Net WFSB service to Fairfield County.
Service & Interference is based on OET Bulletin 69 predictive method.

Narrative:

From the above figures – WFSB is predicted to provide service to 247,954 households within Fairfield County, of those predicted service households interference is predicted to occur to 147,534 households from co-channel WCBS (New York), the net interference free household number is 100,420.

The calculation method for the population number is the same, WFSB is predicted to provide service to 640,015 persons within Fairfield County, of the predicted population, interference is predicted to 381,414 persons from WCBS (NEW York), the net interference free population number is 258,601 persons.

Fairfield CT (County) Percentages of service are:

	Households	Population
WFSB-DT (Service)	100%	100% (baseline service in Fairfield County)
WCBS-TV (Interference to WFSB)	59.5%	59.6%
WFSB-DT Interference Free Service:	40.5%	40.4%

Summary: OVER-THE-AIR SERVICE TO FAIRFIELD COUNTY

Nearly 60 % of the service to Fairfield County that WFSB is predicted to provide is subject to interference from co-channel WCBS, New York.

ATTACHMENT D-2

PSIP CHANNEL 3

(Digital Service Area)

COMMON PSID CHANNELS AND MUTUAL OVERLAP BETWEEN FACILITIES

PSIP CHANNEL 3-1

DIGITAL SERVICE CONTOURS WITH A
TYPICAL CONSUMER DIRECTIONAL RX ANTENNA
(WINEGARD HD-7082 OR SIMILAR)

FAIRFIELD COUNTY CT

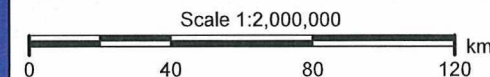
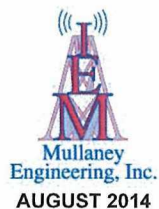
WFSB-DT
BLCDT20041029AIL
RF Channel: 33
PSIP Channel 3-1

KVNC-DT (CP)
BPCDT20130528AJP
RF Channel: 3
PSIP Channel: 3-1

DIGITAL SERVICE CONTOURS

**THERE IS NO OVERLAP OF PSIP SERVICE WHEN A
CONSUMER GRADE OUTDOOR ANTENNA IS CONSIDERED
A CONSERVATIVE FRONT TO BACK RATIO OF 15 DB OF THE
RX ANTENNA HAS BEEN APPLIED IN THIS EXHIBIT**

THE EXHIBIT ASSUMES THE USE OF A WIDEBAND VHF/UHF
CONSUMER GRADE DIRECTIONAL RX ANTENNA AND THAT IT
IS ROTATED TO THE DESIRED STATION.



Certificate of Service

I, Michelle Brown Johnson, hereby certify that on this 8th day of August, 2014, I caused copies of the foregoing "Alternative PSIP Proposal" to be placed in the U.S. Postal Service, first class postage prepaid, or hand-delivered (as indicated below) addressed to the following persons:

Barbara Kreisman, Chief (by hand)
Video Division
Media Bureau
Federal Communications Commission
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