

January 30, 2018

Federal Communications Commission
ATTN: Michelle Carey, Chief, Media Bureau
445 12th St SW
Washington, DC 20554

Re: Petitions for Special Relief of Monongalia County, West Virginia and Preston County, West Virginia for WDTV and WVFX, Docket No. 17-275, CSR-8942-A, and WBOY-TV, Docket No. 17-274, CSR-8941-A.

Dear Ms. Carey:

Gray Television Licensee, LLC (“Gray”), licensee of broadcast television stations WVFX-TV and WDTV, and Nexstar Broadcasting, Inc. (“Nexstar”), licensee of broadcast television station WBOY-TV (together with WVFX-TV and WDTV, the “Stations”), hereby submit this joint letter in response to an informal request from the Commission’s staff seeking viewership data for the Stations in Monongalia and Preston Counties.

To the best of Gray’s and Nexstar’s knowledge, no reliable or recent ratings data for the Stations is reasonably available. Monongalia and Preston Counties are in the Pittsburgh DMA. In that market, Nielsen gathers ratings data primarily through the use of its people meters. A people meter determines which station is being watched by reading a watermark that the station must insert into its signal. If a station does not have a Nielsen watermark in its signal, it is invisible to the people meter. In other words, for non-watermarked stations, a people meter will not show any ratings whatsoever.

None of the Stations have included any Nielsen watermarks in their signals during any of the prior Nielsen ratings periods. In the Clarksburg-Weston DMA, where Nielsen has assigned the Stations, Nielsen still relies on paper diaries to calculate ratings.¹ Thus, the Stations have had no incentive to purchase and install the expensive encoder necessary to generate a Nielsen watermark for their signals. As a result, any data generated from Nielsen people meters for Monongalia and Preston Counties would not show any viewership for the Stations – even if every household in each county was exclusively watching the Stations during every hour of every day.

The Commission recently acknowledged the difficulty for stations in Nielsen diary markets to obtain reliable ratings data for viewers living in counties assigned to DMAs where Nielsen uses watermarks to measure ratings.² For the same reasons the Commission accepted in

¹ Unlike in people meter markets or set-top box markets, which rely on devices to read watermarks in a television station’s signal, in diary markets viewers handwrite into their Nielsen diary the television stations they are watching at any given time.

² *The Electric Plant Board for the City of Russellville, et al., for Modification of the Television Market for WBKO(TV)*, 32 FCC Rcd 10255, 10263, ¶ 15 (2017) (acknowledging the “limited utility” of ratings data for station WBKO(TV) because, among other things, it did not have a Nielsen watermark).

Electric Plant Board, the petitioners in this proceeding will not be able to obtain reliable Nielsen data for the Stations in Monongalia and Preston Counties. In short, none exists.

If the Commission has any questions about this issue, please contact the undersigned.

Sincerely,

/s/

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/s/

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