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March 22, 2019

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Amendment to the Commission's Rules Concerning Market Modification;  
Implementation of Section 102 of the STELA Reauthorization Act of 2014 –  
MB Docket No. 15-71***

Dear Ms. Dortch:

Consistent with the Commission's 2015 order in the above-referenced docket,<sup>1</sup> enclosed please find the results of DIRECTV's preliminary evaluation of its spot beam coverage for stations KOLO, KTVN, KRXI, and KRNW, each located in the Reno, NV DMA, for purposes of carriage in Esmeralda County, Nevada.

Please contact me should you have any questions.

Respectfully submitted,

/s/ Amanda E. Potter

Amanda E. Potter

Enclosure

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<sup>11</sup> *Amendment to the Commission's Rules Concerning Market Modification; Implementation of Section 102 of the STELA Reauthorization Act of 2014*, Report and Order, 30 FCC Rcd 10406 (2015).



Via U.S. Mail

March 21, 2019

Board of County Commissioners  
Esmeralda County  
P.O. Box 517  
Goldfield, NV 89013

Dear Esmeralda County Commissioners:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for **Esmeralda County, NV**.

Please note that DIRECTV does not carry Reno station KRNS-CD, so therefore, was unable to evaluate its coverage of Esmeralda County. However, DIRECTV's engineering staff was given the Esmeralda County zip codes to evaluate for stations **KOLO, KTVN, KRXI, and KRNK** on our **Reno, NV** spot beam, and have found that:

- DIRECTV's SD spot beam cover **three out of four** zip codes in **Esmeralda County: 89010, 89047, and 89049**
- DIRECTV's HD spot beam cover **all four** zip codes in **Esmeralda County: 89010, 89013, 89047, and 89049**

In the event that any of these four Reno stations were to be carried by DIRECTV in Esmeralda County, customers with SD equipment in zip code 89013 would need to obtain HD equipment in order to receive them.

DIRECTV will forward the results of this preliminary evaluation to the FCC for their records. Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

DIRECTV

# Form of Certification Regarding Spot Beam Coverage

1. My name is Constance Goshgarian. I am VP Systems Engineering and Architecture at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
KOLO	NV	ESMERALDA

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
  - a. The measured performance of the spot beam covering this Television Station's local market.
  - b. Estimated atmospheric effects for reception of the signal.
  - c. Estimated levels of interference.
  - d. The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
  - e. The target availability figure used for all television stations offered on the spot beam.
4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
  - a. Signal availability.
  - b. Clear sky signal margin.
  - c. Total carrier-to- interference ratio.
5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
6. Based on this analysis, DIRECTV:  
☒HD ☐SD Can provide service to all the zip codes associated with this request.\*  
☐HD ☐SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.  
☐HD ☒SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.\* The list of unserved zip codes is attached.

\* IMPORTANT: SD coverage will no longer be available after 2019/2020 when the existing MPEG 2 satellite is removed from service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 03/18/2019

Date



Signature

Monday, February 18, 2019

# Form of Certification Regarding Spot Beam Coverage

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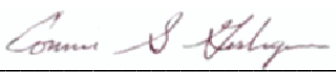
Station	State	County
KRNV	NV	ESMERALDA

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
  - a. The measured performance of the spot beam covering this Television Station's local market.
  - b. Estimated atmospheric effects for reception of the signal.
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Station	State	County
KRXI	NV	ESMERALDA

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Station	State	County
KTVN	NV	ESMERALDA

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Monday, February 18, 2019

Station	Zip	USPSFIPS	State	County	Covered_SD (T7S Beam 7 Txp 29)	Covered_HD (T14 Beam 22 Txp 1)	Evaluation Completed
KOLO	89010	32009	NV	ESMERALDA	Yes - PO box -evaluated as 89047	Yes - PO box -evaluated as 89047	2/20/2019
KOLO	89013	32009	NV	ESMERALDA	No	Yes	2/20/2019
KOLO	89047	32009	NV	ESMERALDA	Yes	Yes	2/20/2019
KOLO	89049	32009	NV	ESMERALDA	Yes, for the portion of the ZC in Esmeralda County	Yes, for the portion of the ZC in Esmeralda County	2/20/2019
KRNV	89010	32009	NV	ESMERALDA	Yes - PO box -evaluated as 89047	Yes - PO box -evaluated as 89047	2/20/2019
KRNV	89013	32009	NV	ESMERALDA	No	Yes	2/20/2019
KRNV	89047	32009	NV	ESMERALDA	Yes	Yes	2/20/2019
KRNV	89049	32009	NV	ESMERALDA	Yes, for the portion of the ZC in Esmeralda County	Yes, for the portion of the ZC in Esmeralda County	2/20/2019
KRXI	89010	32009	NV	ESMERALDA	Yes - PO box -evaluated as 89047	Yes - PO box -evaluated as 89047	2/20/2019
KRXI	89013	32009	NV	ESMERALDA	No	Yes	2/20/2019
KRXI	89047	32009	NV	ESMERALDA	Yes	Yes	2/20/2019
KRXI	89049	32009	NV	ESMERALDA	Yes, for the portion of the ZC in Esmeralda County	Yes, for the portion of the ZC in Esmeralda County	2/20/2019
KTVN	89010	32009	NV	ESMERALDA	Yes - PO box -evaluated as 89047	Yes - PO box -evaluated as 89047	2/20/2019
KTVN	89013	32009	NV	ESMERALDA	No	Yes	2/20/2019
KTVN	89047	32009	NV	ESMERALDA	Yes	Yes	2/20/2019
KTVN	89049	32009	NV	ESMERALDA	Yes, for the portion of the ZC in Esmeralda County	Yes, for the portion of the ZC in Esmeralda County	2/20/2019