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May 2, 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 WXOW and WLAX, each located in the La Crosse-Eau Claire, WI DMA, for purposes of carriage in Washburn County, Wisconsin.

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 FedEx

May 2, 2019

Tom Boron  
Washburn County Information Technology Director  
Washburn County  
P.O. Box 639  
10 4<sup>th</sup> Avenue  
Shell Lake, WI 54871

Dear Mr. Boron:

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

Please note that DIRECTV does not carry La Crosse-Eau Claire, WI local channel WEUX, so therefore, cannot evaluate its coverage of Washburn County, WI. However, DIRECTV's engineering staff was given the Washburn County zip codes to evaluate for stations **WXOW (ABC) and WLAX (FOX)** on our **La Crosse-Eau Claire, WI** spot beam, and have found that:

- DIRECTV's HD spot beam covers **ALL** zip codes in **Washburn County**

Please note that the La Crosse-Eau Claire DMA, the home DMA for these two stations, has only an HD spot beam for local channels, and customers must have HD equipment to receive local stations. As a result, in the event that either of the stations were to be carried by DIRECTV in Washburn County, customers located in Washburn County with SD equipment would need to obtain HD equipment to receive these additional channels.

DIRECTV will forward the results of this preliminary evaluation to the FCC for its 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
WLAX	WI	WASHBURN

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:
  - ☒ Can provide service to all the zip codes associated with this request.
  - ☐ Cannot provide service to any of the zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
  - ☐ Cannot provide service to some of the 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.

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

Executed on 04/12/19  
Date

  
Signature

Monday, April 01, 2019

# 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
WXOW	WI	WASHBURN

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:

- The measured performance of the spot beam covering this Television Station's local market.
- Estimated atmospheric effects for reception of the signal.
- Estimated levels of interference.
- The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
- 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:

- Signal availability.
- Clear sky signal margin.
- 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:

- ☒ Can provide service to all the zip codes associated with this request.
- ☐ Cannot provide service to any of the zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
- ☐ Cannot provide service to some of the 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.

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

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