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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 WRAL, located in the Raleigh-Durham, NC DMA, and WNCT, located in the Greenville-New Bern, NC DMA, for purposes of carriage in Gates County, North Carolina.

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

Natalie Menius Rountree  
County Manager  
Gates County  
200 Court Street  
P.O. Box 148  
Gatesville, NC 27938

Dear Ms. Rountree:

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

Please note that "Spectrum News, Coastal" is not a broadcast station and is, therefore, ineligible for a Market Modification. For this reason, we did not evaluate its coverage of Gates County. However, DIRECTV's engineering staff was given the Gates County zip codes to evaluate for station **WRAL (NBC)** on our **Raleigh-Durham, NC** spot beams, and have found that:

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

DIRECTV's engineering staff was also given the Gates County zip codes to evaluate for **WNCT (CBS)** on our **Greenville-New Bern, NC** spot beam (there is no SD spot beam in that DMA):

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

Further, DIRECTV notes that the Greenville-New Bern, NC DMA, the home DMA for WNCT, has only an HD spot beam for local channels, and customers must have HD equipment in order to receive local stations. As a result, in the event DIRECTV were to carry WNCT in Gates County, only customers with HD equipment would be able to receive WNCT. Customers with SD equipment would need to obtain HD equipment in order to receive WNCT.

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
WNCT	NC	GATES

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

Friday, March 22, 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
WRAL	NC	GATES

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 04/12/19

Date



Signature

Friday, March 22, 2019