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May 15, 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; Elbert County, Georgia Petition for Modification of the Television Markets of WSB-TV, WXIA, WAGA, and WGCL, MB Docket No. 19-94*

Dear Ms. Dortch:

Enclosed please find the *revised* results of DIRECTV's preliminary evaluation of its spot beam coverage for stations WSB-TV, WXIA, WAGA, and WGCL, each located in the Atlanta, GA DMA, for purposes of carriage in Elbert County, Georgia. As detailed in the enclosure, DIRECTV's planned retirement of a standard-definition satellite later this year necessitates a revision to DIRECTV's engineering certifications regarding the geographic spot beam coverage for the broadcast stations at issue in Elbert County's pending petition. As the enclosure indicates, DIRECTV has shared these revised results with representatives for Elbert County.

Please contact me should you have any questions.

Respectfully submitted,

/s/ Amanda E. Potter

Amanda E. Potter

Enclosure

cc (by email): Evan Baranoff



Via E-mail and US Mail

May 14, 2019

D. Matthew Easom
Berelc Law Office, P.C.
P.O. Box 786
Lavonia, GA 30553
matt@berelclawoffice.com

Dear Mr. Easom:

Please find attached updated results of your request for a preliminary evaluation of a potential market modification for **Elbert County, GA**.

DIRECTV understands that Elbert County filed a market modification petition with the Federal Communications Commission ("Commission") on March 29, 2019, which relied on DIRECTV's September 2016 preliminary evaluation. The Commission's Media Bureau subsequently issued a Public Notice on April 5, 2019, opening a response window for the relevant satellite providers. DIRECTV was initially able to confirm from our engineers that our 2016 preliminary evaluation remained accurate. However, our engineers subsequently updated the evaluation for Elbert County based on plans to replace an SD satellite later this summer.

After re-evaluating our Atlanta, GA spot beam coverage following the replacement of the SD satellite, DIRECTV's engineering staff concluded that one zip code, 30635, will no longer be covered by our SD spot beam when the planned replacement of the SD satellite occurs. The remaining results from the 2016 preliminary evaluation remain unchanged. Accordingly, DIRECTV's revised preliminary evaluation results are as follows:

- DIRECTV's SD spot beam will cover **15 of the 16** zip codes in **Elbert County**
- DIRECTV's HD spot beam covers **ALL** zip codes in **Elbert County**

DIRECTV does not take the position that carriage of WAGA, WGCL, WSB, and WXIA in the County is technically or economically infeasible in these unique circumstances. However, in the event DIRECTV were to carry Atlanta, GA stations in Elbert County, customers with SD equipment in the 30635 zip code would need to obtain HD equipment in order to receive them. Under these circumstances, HD equipment is made available at no additional charge for customers who require an upgrade to receive local channels in a modified market.¹

¹ Other terms and conditions associated with the equipment offer are disclosed to customers at the time of the upgrade.



DIRECTV will forward the results of this updated feasibility determination 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 - Architecture Engineering 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
WAGA	GA	ELBERT

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:

- ☒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 2018/2019 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 04/30/2019
Date


Signature

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Station	State	County
WGCL	GA	ELBERT

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- The measured performance of the spot beam covering this Television Station's local market.
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- ☐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.

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Station	State	County
WSB	GA	ELBERT

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- The measured performance of the spot beam covering this Television Station's local market.
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