



FRANKLIN COUNTY
BOARD OF COMMISSIONERS

"You Are Why We Are Here"

June 18, 2018

The Honorable Ajit V. Pai
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20536

Dear Chairman Pai and Commission Board:

Franklin County citizens seek to change our market and empower ourselves with news and information from our home state. We appreciate the opportunity that legislators and the Federal Communications Commission has offered to local governments through the STELAR act and subsequent regulations. We acknowledge that the Commission expressed the difficulty that county governments might have in making a petition through the market modification process. However, as representatives of our citizens, we must face the stated difficulty and uncertainty of a process foreign to our normal operations and be ambassadors for our community.

As County Manager, I was charged with pursuing the market modification on behalf of Franklin County citizens. I surveyed our residents, sought advice and expertise, prepared the petition, and gathered supporting documentation.

The Commission recommended that county governments consult with the affected stations prior to filing. Franklin County followed that recommendation. In the attached emails, you will see that I reached out to each of the four desired Atlanta stations. As a member of the local government, access to communication sector information and personnel was limited. This was another challenge we faced. Only one station (WXIA) responded. In their response, they expressed they do not object to filing the market modification request. However, they did inform me of some additional challenges involved with satellite distribution rights.

I do not believe that an absence of a letter of support is the presence of an opposition to the request. Sometimes, parties remain neutral and allow the process to work.

Thank you for your consideration,



Beth Thomas
County Manager

Beth Thomas

From: Deushane, John <jdeushane@11alive.com>
Sent: Tuesday, June 06, 2017 10:08 AM
To: Beth Thomas
Subject: RE: Franklin County Market Modification Request

Flag Status: Flagged

Hello Ms. Thomas -- Thank you for your outreach regarding the satellite market modification request. With or without an FCC market modification, we would be pleased to discuss an arrangement with either or both of the satellite companies regarding the delivery of our local news and public affairs programming in Franklin County. We are in a position to grant those rights now if the satellite operators wish to have them. You should know that with respect to our network programming, our contracts limit our satellite distribution rights to the Nielsen-defined DMA, and a STELAR market modification would not expand those rights to Franklin County (unless it led Nielsen to change how it defines our DMA). We do not object to your filing the market modification request, but wanted to let you know that it is unlikely to change our ability to distribute programming in Franklin County. As noted, we would be happy to work with the satellite operators to distribute our local news and content to the people of Franklin County even without a market modification.

John

John Deushane
President & General Manager
WXIA/WATL
One Monroe Place
Atlanta, Georgia 30324
404.873.9127
www.11alive.com



2016's Most Awarded Atlanta News Station

25 Emmys 14 APME Awards 9 Edward R. Murrow Awards (6 Regional, 3 National) 1 Peabody 6 Gabbys

A TEGNA Company

From: Beth Thomas [<mailto:bthomas@franklincountyga.com>]
Sent: Thursday, May 25, 2017 10:56 AM
To: Deushane, John <jdeushane@11alive.com>
Subject: Franklin County Market Modification Request
Importance: High

External Email – Be Suspicious of Attachments, Links and Requests for Login Information

Dear Mr. Deushane:

Good morning. I hope this email finds your well.

My name is Beth Thomas, and I serve as the County Manager for Franklin County in Northeast Georgia. Franklin County is a part of the Greenville-Spartanburg-Anderson-Asheville DMA and is considered an orphan county since we receive no in-state programming for news, sports, politics and weather. Our neighboring counties Hart, Stephens, and Elbert, are also considered orphan counties. Collectively, we have a population of approximately 94,000. With the I-85 corridor splitting our county, we are poised for additional economic and population growth.

Our citizens have been very vocal about their concerns over this matter for quite sometime. A result survey showed that 94.7% of all respondents in our four county area desires in-state programming. Our DMA designation does not appear to match with our shopping or service delivery patterns. 91% of respondents state that they shop in the state of Georgia, and over 97% state that they receive services (healthcare, etc.) in the state of Georgia. In addition, our DMA designation prevents our citizens from receiving important political news. Variations in voting patterns for our orphan counties can be directly correlated with the absence of in-state political news and advertising.

Since the passing of the STELAR Act, we have been working diligently to prepare a satellite market modification request. While we have to file the petitions separately, the four counties are working well with each other to consolidated efforts. I have paperwork prepared to petition the FCC for each of the main four broadcasters in the Atlanta DMA, including WXIA-TV. As I work with a group in Georgia and DC to finalize our petitions, I have learned it is imperative to receive support from the parties involved. We have recently received our letter of support from our districts US Representatives and US Senators. However, it is important to us that we have the support of the broadcasters. In terms of television/media delivery, we are considered "orphans", but we desperately desire to be a part of a home in our home state.

I am respectfully requesting that you review our situation and consider a letter of support for our efforts in Franklin County. Likewise, the other counties are seeking the same letter of support. If you are unable to outright express support for any variation of reason, I request that you look at sending a letter that states you would not oppose our petition and would comply with the change should it be granted by the FCC.

I appreciate your time and consideration, and I look forward to hearing from you.

On behalf of the citizens of Franklin, Stephens, Hart, and Elbert.

Beth Thomas
County Manager
Franklin County

PO Box 159
Carnesville, GA 30521

Phone 706.384.2483
Direct 706.918.3121
Fax 706.384.7089

Beth Thomas

From: Beth Thomas <bthomas@franklincountyga.com>
Sent: Thursday, May 25, 2017 10:56 AM
To: 'kjones@21cf.com'
Subject: Franklin County Market Modification Request

Importance: High

Dear Kris Jones:

Good morning. I hope this email finds your well.

My name is Beth Thomas, and I serve as the County Manager for Franklin County in Northeast Georgia. Franklin County is a part of the Greenville-Spartanburg-Anderson-Asheville DMA and is considered an orphan county since we receive no in-state programming for news, sports, politics and weather. Our neighboring counties Hart, Stephens, and Elbert, are also considered orphan counties. Collectively, we have a population of approximately 94,000. With the I-85 corridor splitting our county, we are poised for additional economic and population growth.

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On behalf of the citizens of Franklin, Stephens, Hart, and Elbert.

Beth Thomas
County Manager
Franklin County

PO Box 159

Beth Thomas

From: Beth Thomas <bthomas@franklincountyga.com>
Sent: Thursday, May 25, 2017 10:56 AM
To: 'Joshua.Pila@meredith.com'
Subject: Franklin County Market Modification Request

Importance: High

Dear Mr. Pila:

Good morning. I hope this email finds your well.

My name is Beth Thomas, and I serve as the County Manager for Franklin County in Northeast Georgia. Franklin County is a part of the Greenville-Spartanburg-Anderson-Asheville DMA and is considered an orphan county since we receive no in-state programming for news, sports, politics and weather. Our neighboring counties Hart, Stephens, and Elbert, are also considered orphan counties. Collectively, we have a population of approximately 94,000. With the I-85 corridor splitting our county, we are poised for additional economic and population growth.

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I appreciate your time and consideration, and I look forward to hearing from you.

On behalf of the citizens of Franklin, Stephens, Hart, and Elbert.

Beth Thomas
County Manager
Franklin County

PO Box 159

Beth Thomas

From: Beth Thomas <bthomas@franklincountyga.com>
Sent: Thursday, May 25, 2017 10:56 AM
To: 'Paul.Scolese@coxinc.com'
Subject: Franklin County Market Modification Request

Importance: High

Dear Mr. Scolese:

Good morning. I hope this email finds your well.

My name is Beth Thomas, and I serve as the County Manager for Franklin County in Northeast Georgia. Franklin County is a part of the Greenville-Spartanburg-Anderson-Asheville DMA and is considered an orphan county since we receive no in-state programming for news, sports, politics and weather. Our neighboring counties Hart, Stephens, and Elbert, are also considered orphan counties. Collectively, we have a population of approximately 94,000. With the I-85 corridor splitting our county, we are poised for additional economic and population growth.

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On behalf of the citizens of Franklin, Stephens, Hart, and Elbert.

Beth

Beth Thomas
County Manager