



Amanda E. Potter
Assistant Vice President-
Senior Legal Counsel

AT&T Services, Inc.
1120 20th Street, NW
Suite 1000
Washington, DC 20036

Phone: 202.457.2103
E-mail: amanda.potter@att.com

August 1, 2018

VIA ECFS

Ms. Marlene 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,¹ enclosed please find the results of DIRECTV's preliminary evaluation of its spot beam coverage for stations WQOW, WEAU, WKBT-DT, WEUX, and WHWC, each located in the La Cross-Eau Claire, WI DMA, and WLEF, located in the Wausau-Rhineland, 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

¹¹ *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 Federal Express

August 1, 2018

Lolita Olson
County Clerk
Washburn County
10 4th Avenue
Shell Lake, WI 54871

Dear Ms. Olson:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for stations WKBT, WQOW, and WEAU in Washburn County, WI.

DIRECTV's engineering staff was given the areas to evaluate for our La Crosse-Eau Claire spot beams, and have found that:

- DIRECTV's spot beam which carries WQOW **does not cover any of the 11 zip codes** in Washburn County, WI
- DIRECTV's spot beam which carries WKBT and WEAU **covers all 11 zip codes** in Washburn County, WI

Please note that the La Crosse-Eau Claire DMA, the home DMA for these three stations, has only an HD spot beam for local channels, and customers must have HD equipment in order to receive local stations. As a result, only Washburn County customers with HD equipment would be able to receive these two stations, should a market modification petition be granted. Customers with SD equipment would need to obtain HD equipment in order to receive these additional channels.

In addition, DIRECTV does not carry stations WEUX, WHWC, and WLEF so therefore, could not evaluate spot beam coverage for stations WEUX, WHWC, and WLEF. The Communications Act and the FCC's rules limit market modifications to commercial broadcast stations. Because WHWC and WLEF are non-commercial educational ("NCE") stations, the stations are not eligible for a market modification. See 47 U.S.C. § 338(I).

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

Station	Zip	USPSFIPS	State	County	Covered_SD	Covered_HD	Evaluation Completed
WKBT	54801	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WKBT	54813	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WKBT	54817	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WKBT	54843	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WKBT	54859	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WKBT	54868	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WKBT	54870	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WKBT	54871	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WKBT	54875	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WKBT	54876	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WKBT	54888	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WQOW	54801	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WQOW	54813	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WQOW	54817	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WQOW	54843	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WQOW	54859	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WQOW	54868	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WQOW	54870	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WQOW	54871	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WQOW	54875	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WQOW	54876	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WQOW	54888	55129	WI	WASHBURN	not carried in SD	NO	7/30/2018
WEAU	54801	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WEAU	54813	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WEAU	54817	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WEAU	54843	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WEAU	54859	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WEAU	54868	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WEAU	54870	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WEAU	54871	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WEAU	54875	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WEAU	54876	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018
WEAU	54888	55129	WI	WASHBURN	not carried in SD	YES	7/30/2018

Form of Certification Regarding Spot Beam Coverage

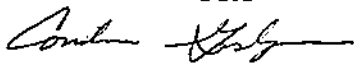
1. My name is CONSTANCE GOSHGARIAN. I am VP SYSTEMS ENGINEERING/ARCHITECTURE at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
WEAU	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.

Executed on 7/30/2018
Date


Signature

Monday, July 16, 2018

Form of Certification Regarding Spot Beam Coverage

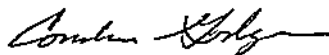
1. My name is CONSTANCE GOSHGARIAN. I am VP SYSTEMS ENGINEERING/ARCHITECTURE at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
WKBT	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.

Executed on 7/30/2018
Date



Signature

Monday, July 16, 2018

Form of Certification Regarding Spot Beam Coverage

1. My name is CONSTANCE GOSHGARIAN. I am VP SYSTEMS ENGINEERING/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.

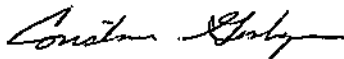
Station	State	County
WQOW	WI	WASHBURN

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.

Executed on 7/30/2018

Date



Signature

Monday, July 16, 2018