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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 KHGI, KOLN, KFXL, and KSNB, each located in the Lincoln-Hastings-Kearney, NE DMA, and stations KHGI-CD, KNPL, KIIT, and KNOP, each located in the North Platte, NE DMA, for purposes of carriage in Cherry County, Nebraska.

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

July 25, 2018

John Thomas
John Thomas Law Office
302 Main Street
Center, NE 68724-0123

Dear Mr. Thomas:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for stations KFXL, KHGI, KOLN, and KSNB in Cherry County, NE.

DIRECTV's engineering staff was given the areas to evaluate for our Lincoln, NE spot beam, and have found that:

- DIRECTV's spot beam does not cover **any of the 15** zip codes in Cherry County, NE

In addition, DIRECTV does not offer local channel service in the North Platte, NE DMA, so therefore, could not evaluate North Platte, NE spot beam coverage for North Platte stations KHGI, KNPL, KIIT and KNOP.

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/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
KFXL	NE	CHERRY

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 7/12/2018
Date


Signature

Form of Certification Regarding Spot Beam Coverage

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2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
KHGI	NE	CHERRY

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- 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.
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Date



Signature

Friday, June 29, 2018

Form of Certification Regarding Spot Beam Coverage

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2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
KOLN	NE	CHERRY

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:
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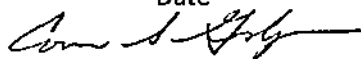
Station	State	County
KSNB	NE	CHERRY

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.
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Friday, June 29, 2018

Station	Zip	State	County	Covered_SD	Covered_HD	Evaluation Completed
KFXL	69135	NE	CHERRY	CH not available in SD	No (PO box evaluated as part of 69214)	7/3/2018
KFXL	69166	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69201	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69211	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69212	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69214	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69216	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69218	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69219	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69220	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69221	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69333	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69343	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69350	NE	CHERRY	CH not available in SD	No	7/3/2018
KFXL	69366	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69135	NE	CHERRY	CH not available in SD	No (PO box evaluated as part of 69214)	7/3/2018
KHGI	69166	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69201	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69211	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69212	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69214	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69216	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69218	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69219	NE	CHERRY	CH not available in SD	No (PO box evaluated as part of 69216)	7/3/2018
KHGI	69220	NE	CHERRY	CH not available in SD	No (PO box evaluated as part of 69201)	7/3/2018
KHGI	69221	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69333	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69343	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69350	NE	CHERRY	CH not available in SD	No	7/3/2018
KHGI	69366	NE	CHERRY	CH not available in SD	No	7/3/2018
KOLN	69135	NE	CHERRY	CH not available in SD	No (PO box evaluated as part of 69214)	7/3/2018
KOLN	69166	NE	CHERRY	CH not available in SD	No	7/3/2018
KOLN	69201	NE	CHERRY	CH not available in SD	No	7/3/2018
KOLN	69211	NE	CHERRY	CH not available in SD	No	7/3/2018
KOLN	69212	NE	CHERRY	CH not available in SD	No	7/3/2018
KOLN	69214	NE	CHERRY	CH not available in SD	No	7/3/2018
KOLN	69216	NE	CHERRY	CH not available in SD	No	7/3/2018
KOLN	69218	NE	CHERRY	CH not available in SD	No	7/3/2018
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KOLN	69220	NE	CHERRY	CH not available in SD	No (PO box evaluated as part of 69201)	7/3/2018
KOLN	69221	NE	CHERRY	CH not available in SD	No	7/3/2018
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KOLN	69350	NE	CHERRY	CH not available in SD	No	7/3/2018
KOLN	69366	NE	CHERRY	CH not available in SD	No	7/3/2018
KSNB	69135	NE	CHERRY	CH not available in SD	No (PO box evaluated as part of 69214)	7/3/2018
KSNB	69166	NE	CHERRY	CH not available in SD	No	7/3/2018
KSNB	69201	NE	CHERRY	CH not available in SD	No	7/3/2018
KSNB	69211	NE	CHERRY	CH not available in SD	No	7/3/2018
KSNB	69212	NE	CHERRY	CH not available in SD	No	7/3/2018

Station	Zip	State	County	Covered_SD	Covered_HD	Evaluation Completed
KSNB	69214	NE	CHERRY	CH not available in SD	No	7/3/2018
KSNB	69216	NE	CHERRY	CH not available in SD	No	7/3/2018
KSNB	69218	NE	CHERRY	CH not available in SD	No	7/3/2018
KSNB	69219	NE	CHERRY	CH not available in SD	No (PO box evaluated as part of 69216)	7/3/2018
KSNB	69220	NE	CHERRY	CH not available in SD	No (PO box evaluated as part of 69201)	7/3/2018
KSNB	69221	NE	CHERRY	CH not available in SD	No	7/3/2018
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