



**Amanda E. Potter**  
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August 16, 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,<sup>1</sup> enclosed please find the results of DIRECTV's preliminary evaluation of its spot beam coverage for stations KETK, KFXK, KLTV, and KYTX, each located in the Tyler-Longview, TX DMA, for purposes of carriage in Panola County, TX.

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 Federal Express

August 16, 2018

LeeAnn Jones  
Panola County Judge  
Room 216-A  
110 South Sycamore  
Carthage, TX 75633

Dear Ms. Jones:

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

DIRECTV's engineering staff was given the areas to evaluate for stations **KETK, KFXK, KLTV, and KYTX** on our **Tyler-Longview, TX** spot beam, and have found that:

- DIRECTV's SD and HD spot beams cover **all** current zip codes in **Panola County**

Please see attached for specific spot beam zip code coverage information. 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
KETK	75631	48365	TX	PANOLA	YES	YES	8/8/2018
KETK	75633	48365	TX	PANOLA	YES	YES	8/8/2018
KETK	75637	48365	TX	PANOLA	YES - PO Box, evaluated as 75633	YES - PO Box, evaluated as 75633	8/8/2018
KETK	75639	48365	TX	PANOLA	YES	YES	8/8/2018
KETK	75643	48365	TX	PANOLA	YES	YES	8/8/2018
KETK	75652	48365	TX	PANOLA	YES	YES	8/8/2018
KETK	75669	48365	TX	PANOLA	YES	YES	8/8/2018
KETK	75672	48365	TX	PANOLA	YES	YES	8/8/2018
KETK	75685	48365	TX	PANOLA	YES - PO Box, evaluated as 75639	YES - PO Box, evaluated as 75639	8/8/2018
KETK	75691	48365	TX	PANOLA	YES	YES	8/8/2018
KETK	75692	48365	TX	PANOLA	YES	YES	8/8/2018
KETK	75954	48365	TX	PANOLA	YES	YES	8/8/2018
KETK	75974	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75631	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75633	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75637	48365	TX	PANOLA	YES - PO Box, evaluated as 75633	YES - PO Box, evaluated as 75633	8/8/2018
KFXK	75639	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75643	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75652	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75669	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75672	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75685	48365	TX	PANOLA	YES - PO Box, evaluated as 75639	YES - PO Box, evaluated as 75639	8/8/2018
KFXK	75691	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75692	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75954	48365	TX	PANOLA	YES	YES	8/8/2018
KFXK	75974	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75631	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75633	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75637	48365	TX	PANOLA	YES - PO Box, evaluated as 75633	YES - PO Box, evaluated as 75633	8/8/2018
KLTV	75639	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75643	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75652	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75669	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75672	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75685	48365	TX	PANOLA	YES - PO Box, evaluated as 75639	YES - PO Box, evaluated as 75639	8/8/2018

Station	Zip	USPSFIPS	State	County	Covered SD	Covered HD	Evaluation Completed
KLTV	75691	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75692	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75954	48365	TX	PANOLA	YES	YES	8/8/2018
KLTV	75974	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75631	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75633	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75637	48365	TX	PANOLA	YES - PO Box, evaluated as 75633	YES - PO Box, evaluated as 75633	8/8/2018
KYTX	75639	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75643	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75652	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75669	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75672	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75685	48365	TX	PANOLA	YES - PO Box, evaluated as 75639	YES - PO Box, evaluated as 75639	8/8/2018
KYTX	75691	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75692	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75954	48365	TX	PANOLA	YES	YES	8/8/2018
KYTX	75974	48365	TX	PANOLA	YES	YES	8/8/2018

## 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
KETK	TX	PANOLA

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 8/14/2018  
Date

Constance Goshgarian  
Signature

## Form of Certification Regarding Spot Beam Coverage

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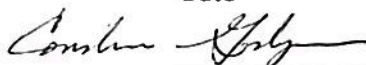
Station	State	County
KFXK	TX	PANOLA

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:
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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.
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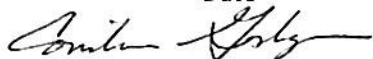
Station	State	County
KLTV	TX	PANOLA

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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I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/14/2018  
Date



Signature

Tuesday, July 24, 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
KYTX	TX	PANOLA

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.
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