



Christopher M. Heimann
Executive Director -
Senior Legal Counsel

AT&T Services, Inc.
1120 20th St., NW, Suite 800
Washington, D.C. 20036
Phone (202) 457-3058
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September 2, 2016

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Cable Special Relief Petitions; MB Docket No. 12-1

Dear Ms. Dortch:

Consistent with the Market Modification docket referenced above, attached are results for a preliminary evaluation of a potential market modification for stations in Hart and Stephens Counties, GA and Montezuma, CO.

If you have any questions, feel free to contact me at (202) 457-3058.

Sincerely,

/s/ Christopher M. Heimann



September 1, 2016

Via US Mail

Terrell Partain
County Administrator
Hart County Board of Commissioners
800 Chandler Street
Hartwell GA, 30643

Dear Mr. Partain:

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

DIRECTV's engineering staff was given the areas to evaluate for our **Atlanta, GA** spot beams, and have found that:

- DIRECTV's SD spot beam covers **all** current zip codes in **Hart County**
- DIRECTV's HD spot beam covers **all** current zip codes in **Hart 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

Form of Certification Regarding Spot Beam Coverage

1. My name is Phil Goswitz. I am SVP of 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	HART

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

8/31/16
Date

Signature

Tuesday, August 09, 2016

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WGCL	GA	HART

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Station	State	County
WSB	GA	HART

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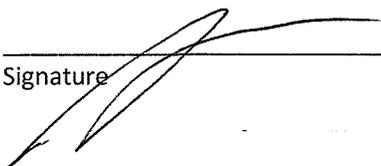
Station	State	County
WXIA	GA	HART

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 - 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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 - b. Clear sky signal margin.
 - c. Total carrier-to-interference ratio.
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Date

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Tuesday, August 09, 2016

Station	Zip	USPSFIPS	State	County	Covered_SD	Covered_HD	Evaluation Completed
WAGA	30516	13147	GA	HART	Yes	Yes	8/15/2016
WAGA	30520	13147	GA	HART	Yes	Yes	8/15/2016
WAGA	30553	13147	GA	HART	Yes	Yes	8/15/2016
WAGA	30624	13147	GA	HART	Yes	Yes	8/15/2016
WAGA	30634	13147	GA	HART	Yes	Yes	8/15/2016
WAGA	30635	13147	GA	HART	Yes	Yes	8/15/2016
WAGA	30643	13147	GA	HART	Yes	Yes	8/15/2016
WAGA	30662	13147	GA	HART	Yes	Yes	8/15/2016
WGCL	30516	13147	GA	HART	Yes	Yes	8/15/2016
WGCL	30520	13147	GA	HART	Yes	Yes	8/15/2016
WGCL	30553	13147	GA	HART	Yes	Yes	8/15/2016
WGCL	30624	13147	GA	HART	Yes	Yes	8/15/2016
WGCL	30634	13147	GA	HART	Yes	Yes	8/15/2016
WGCL	30635	13147	GA	HART	Yes	Yes	8/15/2016
WGCL	30643	13147	GA	HART	Yes	Yes	8/15/2016
WGCL	30662	13147	GA	HART	Yes	Yes	8/15/2016
WSB	30516	13147	GA	HART	Yes	Yes	8/15/2016
WSB	30520	13147	GA	HART	Yes	Yes	8/15/2016
WSB	30553	13147	GA	HART	Yes	Yes	8/15/2016
WSB	30624	13147	GA	HART	Yes	Yes	8/15/2016
WSB	30634	13147	GA	HART	Yes	Yes	8/15/2016
WSB	30635	13147	GA	HART	Yes	Yes	8/15/2016
WSB	30643	13147	GA	HART	Yes	Yes	8/15/2016
WSB	30662	13147	GA	HART	Yes	Yes	8/15/2016
WXIA	30516	13147	GA	HART	Yes	Yes	8/15/2016
WXIA	30520	13147	GA	HART	Yes	Yes	8/15/2016
WXIA	30553	13147	GA	HART	Yes	Yes	8/15/2016
WXIA	30624	13147	GA	HART	Yes	Yes	8/15/2016
WXIA	30634	13147	GA	HART	Yes	Yes	8/15/2016
WXIA	30635	13147	GA	HART	Yes	Yes	8/15/2016
WXIA	30643	13147	GA	HART	Yes	Yes	8/15/2016
WXIA	30662	13147	GA	HART	Yes	Yes	8/15/2016



September 1, 2016

Via E-mail and US Mail

Beth Rider
Certified County Clerk
Building Department
Stephens County Board of Commissioners
37 W. Tugalo Street
Toccoa, Georgia 30577
brider@stephenscountyga.com

Dear Ms. Rider:

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

DIRECTV's engineering staff was given the areas to evaluate for our **Atlanta, GA** spot beams, and have found that:

- DIRECTV's SD spot beam covers **all** current zip codes in **Stephens County**
- DIRECTV's HD spot beam covers **all** current zip codes in **Stephens 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

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
WAGA	GA	STEPHENS

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.

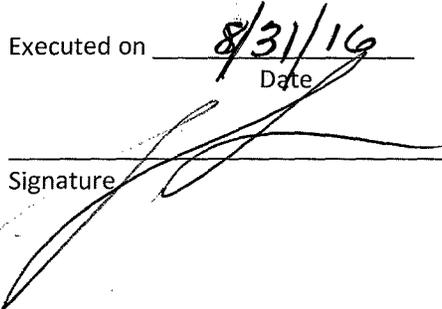
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* IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.

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

Executed on 8/31/16
Date

Signature 

Friday, July 29, 2016

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1. My name is Phil Goswitz. I am SVP of 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
WGCL	GA	STEPHENS

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:

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WSB	GA	STEPHENS

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WXIA	GA	STEPHENS

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Date

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Station	Zip	USPSFIPS	State	County	Covered_SD	Covered_HD	Evaluation Completed
WAGA	30511	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WAGA	30538	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WAGA	30557	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WAGA	30577	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WAGA	30598	13257	GA	STEPHENS	Yes - PO Box evaluated as 30577	Yes - PO Box evaluated as 30577	8/8/2016
WGCL	30511	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WGCL	30538	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WGCL	30557	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WGCL	30577	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WGCL	30598	13257	GA	STEPHENS	Yes - PO Box evaluated as 30577	Yes - PO Box evaluated as 30577	8/8/2016
WSB	30511	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WSB	30538	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WSB	30557	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WSB	30577	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WSB	30598	13257	GA	STEPHENS	Yes - PO Box evaluated as 30577	Yes - PO Box evaluated as 30577	8/8/2016
WXIA	30511	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WXIA	30538	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WXIA	30557	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WXIA	30577	13257	GA	STEPHENS	Yes	Yes	8/8/2016
WXIA	30598	13257	GA	STEPHENS	Yes - PO Box evaluated as 30577	Yes - PO Box evaluated as 30577	8/8/2016



September 1, 2016

Via US Mail

Montezuma County Board of County Commissioners
Montezuma County
109 West Main
Cortez, CO 81321

Dear Montezuma County Board of County Commissioners:

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

DIRECTV's engineering staff was given the areas to evaluate for our **Denver, CO** spot beams, and have found that:

- DIRECTV's SD spot beams do not cover **some** zip codes in **Montezuma County**
- DIRECTV's HD spot beams do not cover **any** zip codes in **Montezuma 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

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Station	State	County
KCNC	CO	MONTEZUMA

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- Signal availability.
- Clear sky signal margin.
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I declare under penalty of perjury that the foregoing is true and correct.

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Signature

Monday, July 25, 2016

Form of Certification Regarding Spot Beam Coverage

1. My name is Phil Goswitz. I am SVP of 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
KDVR	CO	MONTEZUMA

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KMGH	CO	MONTEZUMA

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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
KRMA	CO	MONTEZUMA

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- 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:

- a. Signal availability.
- b. Clear sky signal margin.
- c. 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.

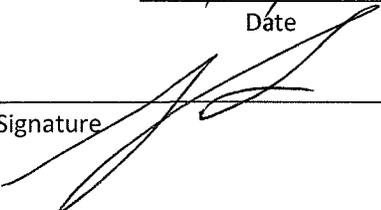
6. Based on this analysis, DIRECTV:

- 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 8/31/16
Date

Signature 

Form of Certification Regarding Spot Beam Coverage

1. My name is Phil Goswitz. I am SVP of 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.

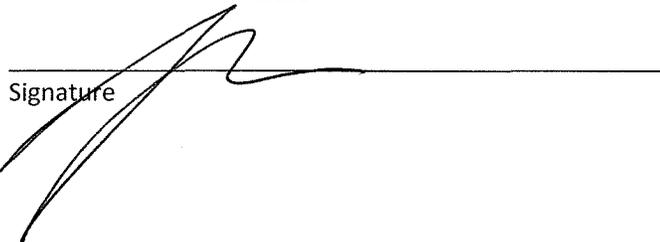
Station	State	County
KTVD	CO	MONTEZUMA

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.
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Monday, July 25, 2016

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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
KUSA	CO	MONTEZUMA

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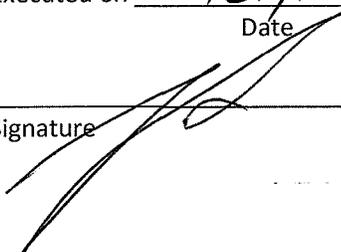
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Station	State	County
KWGN	CO	MONTEZUMA

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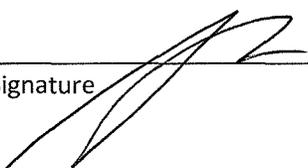
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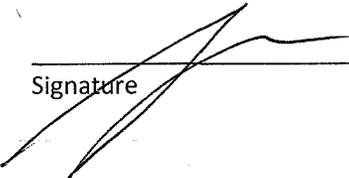
Station	State	County
KZCO	CO	MONTEZUMA

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Station	Zip	USPSFIPS	State	County	Covered_SD	Covered_HD	Evaluation Completed
KCNC	81321	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KCNC	81323	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KCNC	81327	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KCNC	81328	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KCNC	81330	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KCNC	81331	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KCNC	81334	08083	CO	MONTEZUMA	No	No	8/9/2016
KCNC	81335	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KMGH	81321	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KMGH	81323	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KMGH	81327	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KMGH	81328	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KMGH	81330	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KMGH	81331	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KMGH	81334	08083	CO	MONTEZUMA	No	No	8/9/2016
KMGH	81335	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KRMA	81321	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KRMA	81323	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KRMA	81327	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KRMA	81328	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KRMA	81330	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KRMA	81331	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KRMA	81334	08083	CO	MONTEZUMA	No	No	8/9/2016
KRMA	81335	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KTVD	81321	08083	CO	MONTEZUMA	No	No	8/9/2016
KTVD	81323	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KTVD	81327	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KTVD	81328	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KTVD	81330	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KTVD	81331	08083	CO	MONTEZUMA	No	No	8/9/2016
KTVD	81334	08083	CO	MONTEZUMA	No	No	8/9/2016
KTVD	81335	08083	CO	MONTEZUMA	No	No	8/9/2016
KUSA	81321	08083	CO	MONTEZUMA	No	No	8/9/2016
KUSA	81323	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KUSA	81327	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KUSA	81328	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KUSA	81330	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KUSA	81331	08083	CO	MONTEZUMA	No	No	8/9/2016
KUSA	81334	08083	CO	MONTEZUMA	No	No	8/9/2016
KUSA	81335	08083	CO	MONTEZUMA	No	No	8/9/2016
KWGN	81321	08083	CO	MONTEZUMA	No	No	8/9/2016
KWGN	81323	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KWGN	81327	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KWGN	81328	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KWGN	81330	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KWGN	81331	08083	CO	MONTEZUMA	No	No	8/9/2016
KWGN	81334	08083	CO	MONTEZUMA	No	No	8/9/2016
KWGN	81335	08083	CO	MONTEZUMA	No	No	8/9/2016
KZCO	81321	08083	CO	MONTEZUMA	No	N/A	8/9/2016
KZCO	81323	08083	CO	MONTEZUMA	Yes	N/A	8/9/2016
KZCO	81327	08083	CO	MONTEZUMA	Yes	N/A	8/9/2016
KZCO	81328	08083	CO	MONTEZUMA	Yes	N/A	8/9/2016

KZCO	81330	08083	CO	MONTEZUMA	Yes	N/A	8/9/2016
KZCO	81331	08083	CO	MONTEZUMA	No	N/A	8/9/2016
KZCO	81334	08083	CO	MONTEZUMA	No	N/A	8/9/2016
KZCO	81335	08083	CO	MONTEZUMA	No	N/A	8/9/2016
KDVR	81321	08083	CO	MONTEZUMA	No	No	8/9/2016
KDVR	81323	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KDVR	81327	08083	CO	MONTEZUMA	Yes	No	8/9/2016
KDVR	81328	08083	CO	MONTEZUMA	Yes	No	8/9/2016
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KDVR	81334	08083	CO	MONTEZUMA	No	No	8/9/2016
KDVR	81335	08083	CO	MONTEZUMA	No	No	8/9/2016