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September 29, 2016

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

Re: Cable Special Relief Petitions; MB Docket No. 15-71

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 Elbert County, GA.

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

Sincerely,

/s/ Christopher M. Heimann



September 28, 2016

Via E-mail and US Mail

Bill Daughtry
County Attorney
Elbert County, Georgia
P.O. Box 6267
704 Elbert Street
Elberton, GA 30635
daughtrylaw@elberton.net

Dear Mr. Daughtry:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for **Elbert 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 **Elbert County**
- DIRECTV's HD spot beam covers **all** current zip codes in **Elbert 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	ELBERT

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

9/26/16
Date

Signature

Thursday, September 01, 2016

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Station	State	County
WGCL	GA	ELBERT

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- The measured performance of the spot beam covering this Television Station's local market.
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WSB	GA	ELBERT

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WXIA	GA	ELBERT

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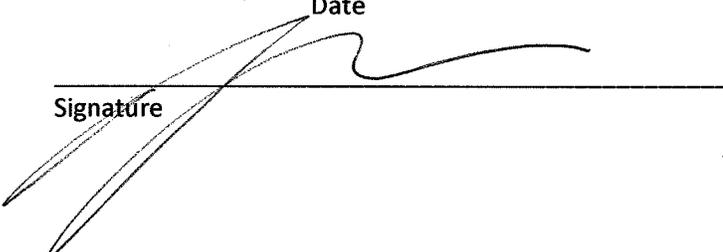
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