

STATE OF UTAH
KUED
COVERAGE MAP
July 1, 1996

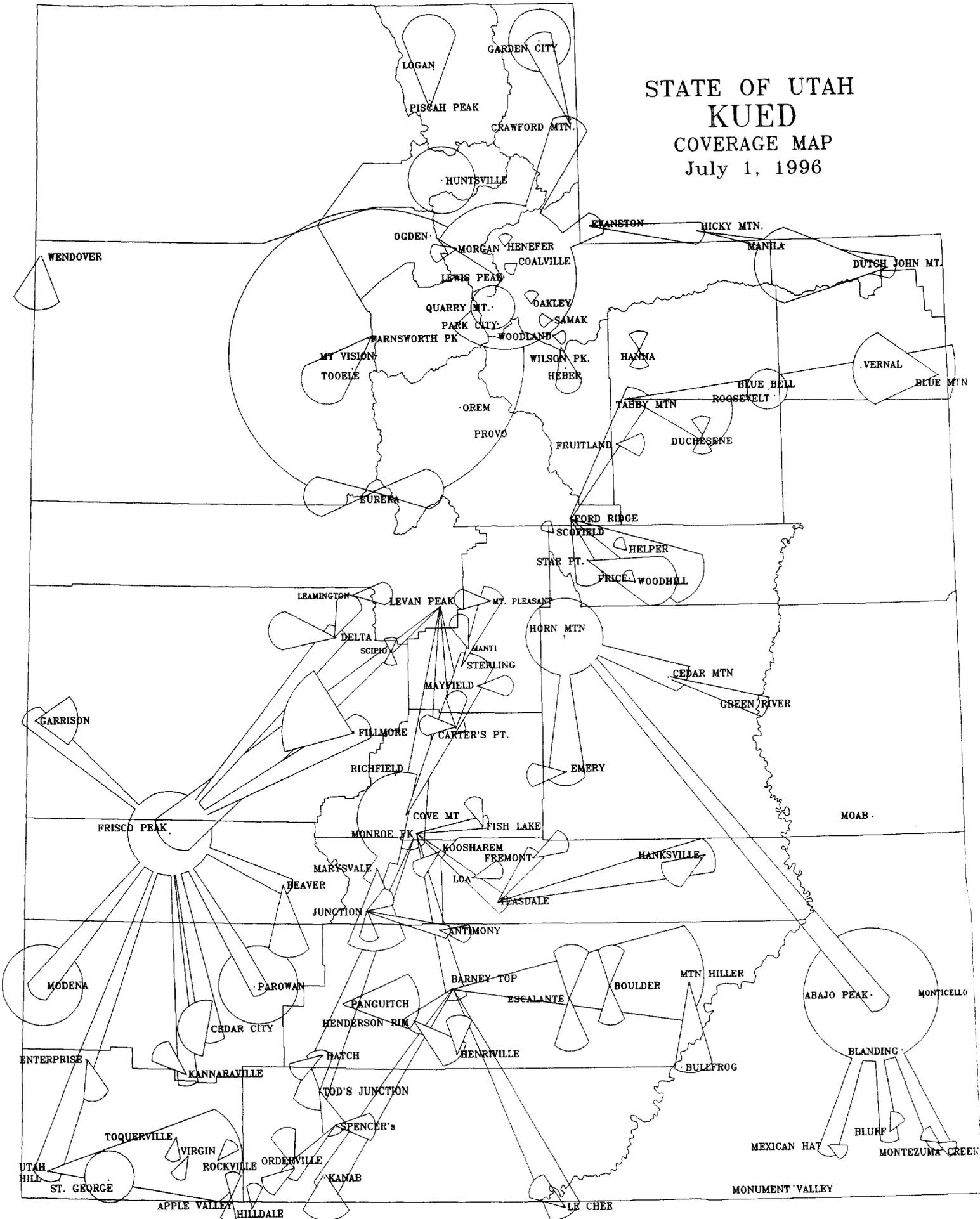
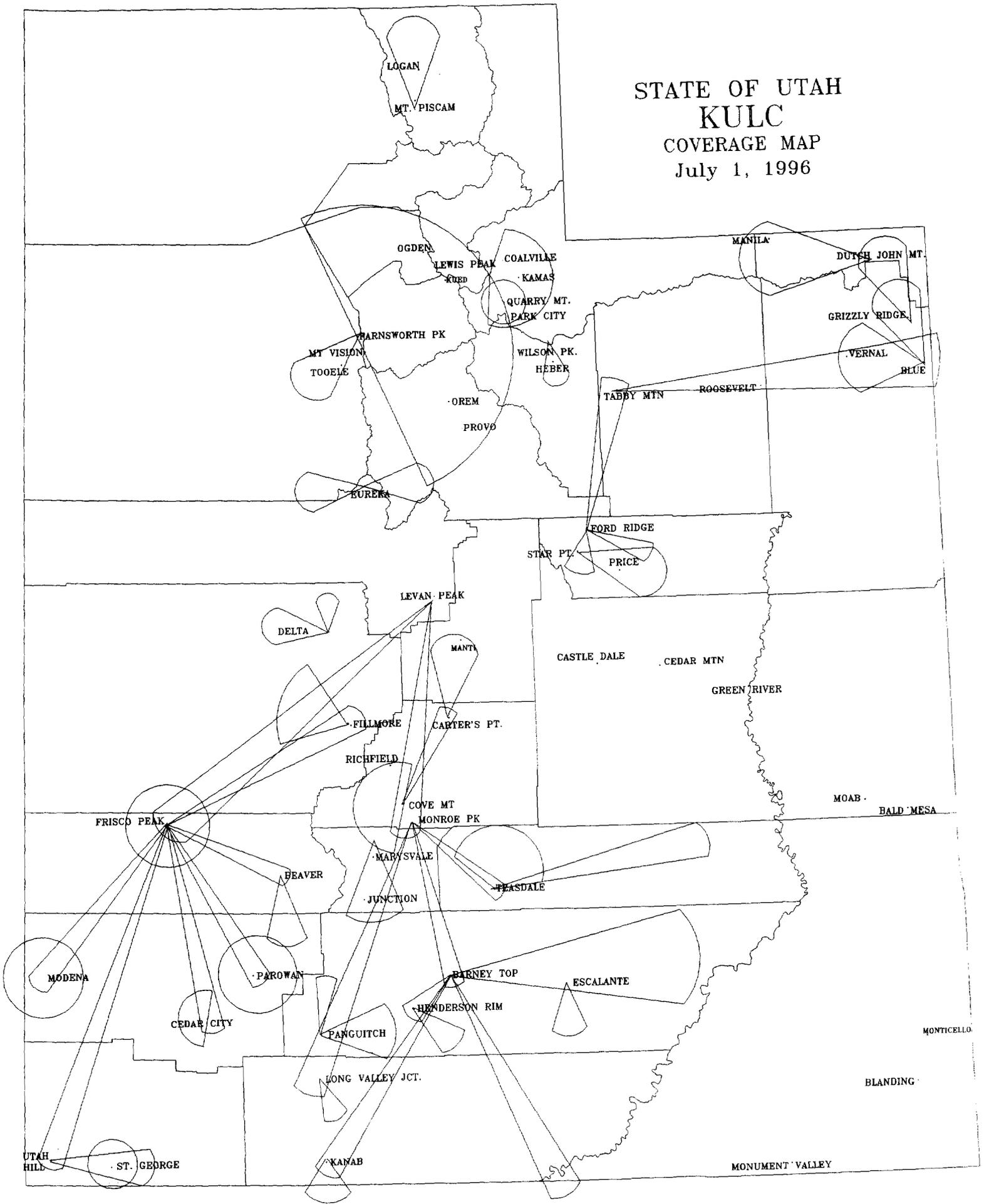


Exhibit 13

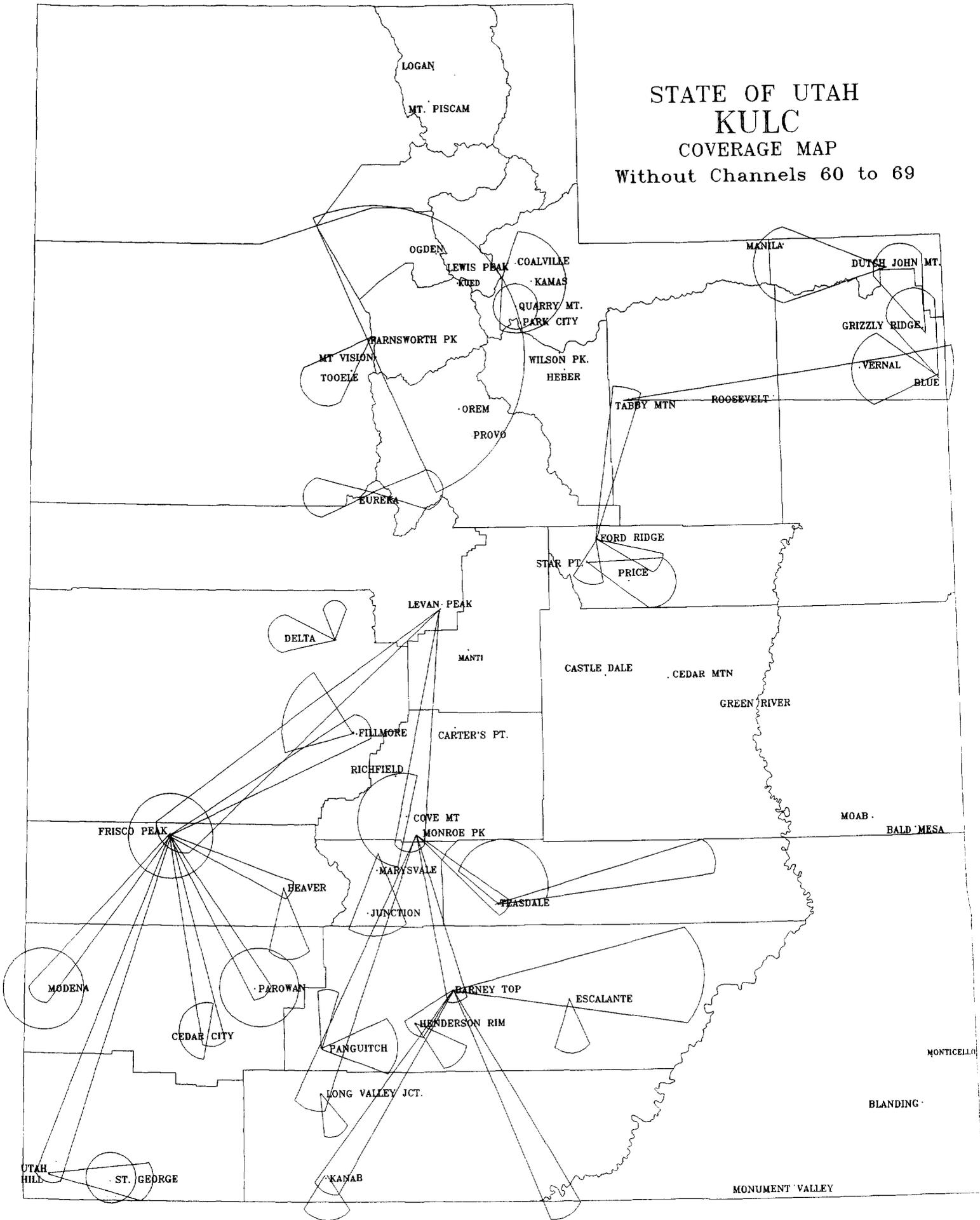
STATE OF UTAH
KULC
COVERAGE MAP
July 1, 1996



STATE OF UTAH
KUED
COVERAGE MAP
Without Channels 60 to 69



STATE OF UTAH
KULC
COVERAGE MAP
Without Channels 60 to 69



ATTACHMENT I



STATE OF UTAH
OFFICE OF THE GOVERNOR
SALT LAKE CITY
84114-0601

MICHAEL O. LEAVITT
GOVERNOR

OLENE S. WALKER
LIEUTENANT GOVERNOR

November 14, 1996

Chairman Reed Hundt
Federal Communications Commission
Washington, DC 20554

Dear Chairman Hundt:

I am writing to you to express my concern for the citizens of rural Utah. They are in danger of losing television services provided by 600 translators that extend from the Wasatch Front to the rural communities. These television translators provide rural residents with local and regional services, such as news, educational programming and sports. The translator network supports Utah's statewide emergency alert plan by distributing emergency information to the rural communities throughout the state.

On August 14, 1996, the Federal Communications Commission released its Sixth Further Notice of Proposed Rule Making on the allotment and assignment of digital television (DTV) channels. Included in this Notice is a proposed channel plan that pairs each existing full power NTSC licensee with a DTV channel. The FCC also proposed, for comment, the early recovery of television broadcast spectrum (spectrum recovery plan) of channels 60 to 69. This would make available television spectrum to be auctioned off for other telecommunication services. Unfortunately, the FCC did not attempt to provide translators with a paired DTV channel, and most of the channels in use today by translators are between 55 to 69.

Based on the Proposed Rule Making, I would like you to respond to the following questions: What is the time line for the actual transition to a full DTV service? How does the FCC view translator service? (I know that it is a secondary service to a primary television service, but if there is no primary service in a rural area, then the translator becomes the primary service.) Why were television translators and LPTVs not considered in the new DTV Allotment Plan? How is the FCC planning to provide local and regional DTV television services to rural America? Does the FCC consider the loss of service to a rural community expendable, and does the FCC even know the number of people who will lose or experience degraded television service? Has the FCC considered the multi-flop issue, and the domino effect (loss of one channel in chain of translators that affects the rest of the chain) in their translator displacement estimate? Has the FCC considered translator input frequencies in their displacement estimate?

Chairman Reed Hundt
Federal Communications Commission
November 14, 1996
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One cannot help but wonder why the urgency on the part of the FCC to auction off channels 60 to 69 before the transition to DTV is complete. It would make more sense to delay the spectrum recovery plan of channels 60 to 69 until the transition to DTV is completed. Then, the FCC could repack the spectrum and auction off what is not being used by full power television stations and translators.

Based on the above concerns and unanswered questions raised by the Sixth Further Notice of Proposed Rule Making, I will recommend a congressional hearing to further investigate what the overall impact will be to the rural communities throughout America.

Sincerely,



Michael O. Leavitt
Governor

MOL:lv:lk

cc: Commissioner James Quello
Commissioner Susan Ness
Commissioner Rachelle Chong

ATTACHMENT II

Secretary
Federal Communications Commission
1919 M St.
Washington, DC 20554

Dennis C. Johnson
P.O. Box 626
570 North 200 East
Parowan, Utah 84761
(801) 477-8239

November 18, 1996

Ref: MM Docket 87-268

Dear Sirs:

It is my understanding that the FCC is once again considering a spectrum recovery plan that includes the immediate elimination of UHF television channels 60-69 and again reducing the television spectrum in the future (channels 2-6 and 50-60). This letter is sent to express my deep concern and disapproval of any measure that would reduce the portion of spectrum currently used for over the air free television.

It is my opinion that the FCC has severely underestimated the impact that such a measure would have on the availability of the free television that is viewed in rural areas solely by the use of television translators. Such television translators have traditionally been viewed by the FCC as a secondary service and as undesirable and unnecessary. To those of us who live in rural America these translators are our link to our state and local governments, entertainment, sports, educational programming and news of local events as well as Emergency Broadcast signals etc.

It is my understanding that FCC estimates show impact and possible reductions of service as a result of this action at approximately 15%. It is my experience in Southern Utah that without rules and guidelines that would allow for re-channeling and reimbursement for cost related to re-channeling, such an action would reduce services provided through these translators by a figure likely in excess of 80%. It is also my estimate that costs to re-channel and relocate these services on a nationwide basis may far outweigh the 50-60 billion dollars expected to be claimed by the Federal government.

I would like to point out a case-in-fact to illustrate and qualify the above statements. As a part of my employment, I maintain eight translators in Southern Utah at a place called Frisco Peak. As a result of the first proposed spectrum recovery (channels 60-69) five of the eight will be displaced. This will result in the loss of input signals to translators in Millard, Iron, Beaver and Washington Counties. These are mountainous areas not capable of being served by existing broadcast stations. This loss includes feeds to 98 translators on 24 different sites, serving 60 different communities with a total of approximately

100,000 residents. The signals being lost are the local (Salt Lake City) ABC, NBC, CBS, and 2 PBS stations. I would also like to point out that these translator stations are the only feed of these local broadcast stations available to cable companies in these areas. Past efforts to license new services on Frisco Peak have shown me that it would be difficult, if not impossible to relocate all of the services currently provided through this facility and does not even attempt to address the costs involved in re-channeling the Frisco Peak translators and the resulting necessity of re-channeling all receive equipment on the sites that receive these signals. You should be able to see that the effects from changes required on this site alone will be tremendous. I would also like to point out that I'm personally aware of three other major translator sites within the state of Utah that will have similar resultant impacts.

I feel it is imperative that as a minimum, the following considerations be given to the translator stations being impacted or displaced by the proposed FCC actions.

1. All translators impacted by the proposed spectrum recovery be allowed to be relicensed and relocated to alternate television channels that will allow complete coverage of all communities previously served.
2. All costs of re-channeling and relicensing be paid for by any alternate service that will benefit from the use of lost television spectrum.
3. Any spectrum recovery plan or sale of spectrum be delayed until full implementation, testing and proving of the proposed Digital television standard. Services to rural America should not be allowed to be lost as a result of these changes.
4. Spectrum should be set aside to allow for future expansion of television services to rural areas.
5. Congress and the FCC should recognize the necessity of television translator stations in serving rural areas where full broadcast stations are not available or economical. Translators are a vital part of communications in rural America and should be considered secondary only to full broadcast television stations in the VHF and UHF television bands. Any additional reduction of the broadcast television spectrum simply can not be tolerated.

Thank You for your consideration.
Sincerely,

Dennis C. Johnson