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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Advanced Television Systems)
and Their Impact upon the)
Existing Television Broadcast)
Service)
)

MM Docket No. 87-268

To: The Commission

**CONSOLIDATED REPLY OF COSMOS BROADCASTING
TO SUPPLEMENT OPPOSITIONS**

Cosmos Broadcasting Corporation ("Cosmos"), licensee of eight television stations located throughout the eastern United States, by its attorneys, and pursuant to Commission notice^{1/} and 47 C.F.R. § 1.429(g), hereby replies to the oppositions filed by Pacific and Southern, Inc., Diversified Communications, Mid-South Public Communications Foundation, and WRDW Licensee Corporation and Raycom-U.S., Inc. (the "Oppositions") in response to Cosmos's Supplement ("Supplement") to the Petition for Reconsideration ("Petition") of the *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*").^{2/} Each of the Oppositions urges that the Commission refuse a request by Cosmos to reassign the DTV allotment for a station. Cosmos sought in its Petition and Supplement reallocations of certain assignments.

1/ 62 Fed. Reg. 47207.

2/ This reply responds only to the oppositions of the listed parties.

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Cosmos reiterates its support for the Commission's efforts to bring the full implementation of digital television to the public as quickly as possible. Accordingly, as it has previously stated, Cosmos agrees with commenters that the Commission should reconsider DTV allotments in discrete situations where meritorious solutions are proposed which facilitate the transition to DTV.^{3/} The Commission's resources are best spent resolving requests for reconsideration of the DTV Table of Allotments all at once, rather than later sorting through the moving target represented by numerous modification applications which individually and sequentially must satisfy the Commission's short-spacing and interference standards. By reconsidering discrete reallocations at one time and approving of those which result in minimal impact, the Commission can avoid the "ripple" fears anticipated by various commenters (including the Oppositions).

Cosmos appreciates the opportunity offered by the Commission to propose discrete reallocations to the DTV Table. Cosmos provided the Commission with ample and reliable information that can be used to evaluate the merits of the requests for reconsideration. If other broadcasters, such as Diversified Communications ("Diversified"), elect to refrain from working to identify alternative allotments to DTV assignments which could improve replication of their current service areas,^{4/} that is their choice. However, Diversified's choice to "accept[] [their allotment] . . . without opposition"^{5/} and not seek improvements to

^{3/} See, e.g., Reply of Cosmos Broadcasting to Opposition by Mid-South, submitted July 31, 1997, at 2; Petition for Clarification and Partial Reconsideration submitted by the Association for Maximum Service Television and the Broadcasters Caucus and other Broadcasters, submitted June 13, 1997, at 18.

^{4/} Diversified Opposition to Cosmos Supplement, submitted Sept. 4, 1997, at 3-4.

^{5/} *Id.* at 3.

the DTV Table does not give Diversified the power to impose its resolution methodology on others and silence the requests of Cosmos.

Cosmos's requests for reconsideration of certain DTV assignments typically seek to move from "out-of-core" to inside the Commission's "core" spectrum.^{6/} Cosmos acknowledged that these proposals would allow it to lower operating and start-up costs. WRDW Licensee, Inc. ("WRDW") and Raycom-U.S., Inc. ("Raycom") assert that "economic convenience . . . is not a public interest factor."^{7/} Cosmos disagrees. In general, requests such as Cosmos's would allow broadcasters to reduce their enormous DTV roll-out costs and expedite the transition to DTV by permitting the sharing of transmission equipment with existing analog operations. Relocation to the core spectrum also serves to facilitate the Commission's channel repacking, spectrum recovery and subsequent auctions.^{8/} Consistent with efficient spectrum management, the public interest *is* served when desirable VHF spectrum that is at a premium during the DTV transition does not lie fallow.

^{6/} Except for WIS(TV), Columbia, SC, which seeks to move from Channel 41.

^{7/} WRDW and Raycom Opposition to Cosmos Supplement, submitted Sept. 23, 1997, at 3.

^{8/} The Commission has often cited spectrum recovery as one of its overarching policies. *See, e.g., Fifth Report and Order ("Fifth R&O")* at ¶¶4,6 (identifying spectrum efficiency and rapid spectrum recovery as key policy goals); *Id.* at ¶33 (ancillary and supplemental services expedite the transition and spectrum recovery); *Id.* at ¶¶79,83 (decreasing construction period to facilitate spectrum recovery); *Id.* at ¶97 (shutting down NTSC operations will facilitate spectrum recovery, *citing* The Telecommunications Act of 1996); *Sixth R&O* at ¶112 (elimination of vacant allotments will facilitate spectrum recovery); *Reallocation of Television Channels 60-69*, Notice of Proposed Rule Making, ET Docket No. 97-157 (released July 10, 1997) (proposing accelerated recovery of spectrum for public safety and auction purposes).

The Oppositions Misapply the Commission's Standards

Each of the Oppositions urges the Commission to reject Cosmos's requests for certain reallocations. Their arguments are misplaced. The Oppositions mainly contend that Cosmos's proposals violate principles of "no new interference" and geographical spacing and, therefore, fall short of the Commission's standards.^{9/} Cosmos has provided the Commission with technical exhibits indicating that the proposed reallocations would result in varying degrees of "new" interference. The Oppositions, however, have misapplied the standard.

The Commission indicated in the section on "Future Allotments and Modifications" that the "no new interference" and spacing requirements apply to modification applications and future allotments for the DTV Table.^{10/} Such a threshold does not apply to petitions for reconsideration of the DTV Table. The Oppositions' standard clearly would be appropriate *after* the Commission has completed its review of petitions for reconsideration and finalized the DTV Table of Allotments — but that stage in the proceeding has not been reached. Cosmos is petitioning for reconsideration of certain allotments. After the DTV Table is finalized, all broadcasters are free to apply for modifications and new allotments so long as

^{9/} Pacific & Southern Company, Inc. ("P&S") Opposition to Cosmos Supplement, submitted Sept. 23, 1997, at 3; Mid-South Public Communications Foundation ("Mid-South") Opposition to Cosmos Supplement, submitted Sept. 22, 1997, at 2; Diversified Opposition at 3; WRDW and Raycom Opposition at 2.

^{10/} *Sixth R&O* at ¶¶221-222.

they comply with the Commission's rules. The standards sought by the Oppositions, however, need not be applied at this initial stage.^{11/}

Indeed, if the "no new interference" standard were to apply now, many of the Commission's assigned allotments in the DTV Table would not survive. The Commission acknowledges that a number of DTV allotments create new interference^{12/} and has apparently accepted that both NTSC and DTV stations must tolerate some amount of interference during the DTV transition. If the proposed DTV Table creates allotments with small amounts of interference, petitions for reconsideration of the Table should not be subjected to a higher standard. While the Commission may choose of its own accord to apply the "no new interference" standard in reviewing petitions for reconsideration, the Commission's orders do not mandate such a policy.^{13/}

A De Minimis Standard is Appropriate

The appropriate standard for reviewing petitions for reconsideration — and one that the Commission's initial DTV Table of Allotments satisfies — is *de minimis* interference. In stating that the Commission would apply, when considering modifications, "the same engineering technical criteria . . . used in developing the DTV Table,"^{14/} the Commission

^{11/} Similarly, P&S's assertion that a waiver is needed ignores the essence of the reconsideration stage. P&S Opposition at 3. Waivers are case-by-case exemptions to final rules. Cosmos is seeking a reconsideration of certain allotments before they are finalized.

^{12/} *Sixth R&O* at ¶206.

^{13/} This approach would force the Commission to disregard, for example, requests for corrections to coordinate locations.

^{14/} *Sixth R&O* at ¶222.

implied a *de minimis* standard could be acceptable, given that a number of allotments were created with varying amounts of interference. The Commission thus has the task of defining *de minimis* at a level appropriate to resolve interference matters that will be manifested once digital operation begins. Cosmos's requests were prepared assuming that the Commission would define a level of "*de minimis*" interference for the DTV transition. No announcement has been made.^{15/} Cosmos suggests that the Commission announce a level of interference that is considered *de minimis*, apply that standard to requests for reconsideration and grant reallocations where the net increase in interference is *de minimis*.

Even if the Commission were to apply a "no new interference" standard to requests for reconsideration — which it is not required to do — defining some level of interference to be *de minimis* is not inconsistent with that standard. By establishing a *de minimis* level of interference, the Commission could then grant reallocation requests which it considers to be meritorious and remain true to the "no new interference" standard.

Cosmos has shown in the Petition and Supplement that its proposed reallocations have minimal impact on other stations and would satisfy a reasonable definition of *de minimis*. The Oppositions assert otherwise. To bolster their contentions, some of the Oppositions present inaccurate facts and policies. For example, WRDW and Raycom maintain that they rely on the accuracy of Cosmos's technical exhibits, but state that Cosmos "shows [] there is substantial new interference in WRDW DMA counties Saluda, Aiken, Barnwell and

^{15/} The Commission did not define the level of *de minimis* interference either in the *Sixth R&O* or in the belatedly released *OET Bulletin No. 69*, which provided technical criteria for DTV transmissions.

Bamberg.”^{16/} This is not accurate. Cosmos’s technical exhibit shows that there is *no* interference caused to any of these counties.^{17/} Mid-South claims in its opposition that KAIT(TV)’s reallocation — which would result in “new” interference to a total of 127 people (0.01% of WNKO’s service population) — violates the “essential principle of non-interference to NTSC operations.”^{18/} As discussed, the Commission has never established such a policy for the DTV transition, much less made it “essential.” In any event, if 0.01% is not *de minimis*, the term has no meaning. A statement from the general manager of KAIT(TV) further demonstrating the minimal impact that the reallocation request would have is found in Attachment B.

Other assertions in the Oppositions address issues of network coverage and viewing patterns. Cosmos raised these issues to demonstrate the *de minimis* nature of the “new” interference resulting from the requests. Cosmos was not proposing, as alleged by Mid-South, WRDW and Raycom, that such factors should replace stated rules.^{19/} Rather, the Commission should consider any factors it deems appropriate in evaluating whether interference is *de minimis*. P&S accuses Cosmos of applying a double-standard where it complains of interference affecting its own stations.^{20/} Cosmos only requests that a *de*

^{16/} WRDW and Raycom at 2-3.

^{17/} For convenience of the Commission, Cosmos provides a copy of the previously submitted coverage map in Attachment A. Cross hatches represent the new interference created by the proposal. Dots represent existing interference.

^{18/} Mid-South at 2.

^{19/} *Id.*; WRDW and Raycom at 4.

^{20/} P&S at 2-3.

minimis standard apply to *all* allotments: 21,414 affected persons may be *de minimis* in a large market such as P&S's Atlanta, GA; and 2,750 affected persons may be significant in a small market such as WFIE(TV)'s Evansville, IN. For example, as shown in the attached analysis provided by WSFA(TV)'s Chief Engineer (Attachment C), only 0.55% of P&S's service population for WXIA(TV) is predicted to experience interference as a result of Cosmos's proposal.^{21/} Cosmos also provides a manager's statement for WIS(TV) further demonstrating, in addition to the exhibits previously submitted, the *de minimis* nature of the interference created by the proposal in Columbia, SC (Attachment D).

Cosmos acknowledges that everyone must rely on theoretical and predicted amounts of interference caused by and to a relatively untested technology. Critical factors such as DTV receiver performance and noise rejection can only be estimated at this stage. There has been little field testing of digital systems and predicted coverages may not correlate to actual results.^{22/} In spite of these circumstances, the discrete requests for reconsideration presented by Cosmos would improve the Commission's DTV Table of Allotments. Recovery of spectrum is expedited and the impact on other broadcasters is minimal. Cosmos's policy is to cooperate with broadcasters and seek to identify ways to ease the burdensome impact of the DTV transition. Cosmos is prepared, for example, to revert to its current NTSC allotment after the transition period ends. The Commission has the opportunity to facilitate this transition by granting meritorious requests for reconsideration of the DTV Table. By

^{21/} *I.e.*, 3.6% of actual viewers in the *affected* counties is 0.55% of the population in WXIA(TV)'s total service area (3.9% of population in *affected* counties is 0.6% of the population in the total service area).

^{22/} *See* Technical Statement, Attachment E.

resolving allotment concerns at this stage, the Commission will later avoid the DTV Table's moving target represented by sequential grants of numerous individual modification applications. Instead of prematurely applying interference and spacing standards proposed by the Oppositions, the Commission should rely on its well-considered principles in evaluating whether petitions for reconsideration to modify the DTV Table are meritorious.

For the foregoing reasons, and for the reasons set forth in the Petition and Supplement, the Commission should reconsider the certain assignments as proposed by Cosmos.

Respectfully submitted,

COSMOS BROADCASTING CORPORATION

By: 
Werner K. Hartenberger
Scott S. Patrick

Its Attorneys

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
202-776-2000

Dated: October 3, 1997

Attachment A

Previously Submitted Coverage Map of WIS(TV), Columbia, SC



AUGUST 1997

NOTES

- Dots represents existing interference to WRDW-TV from other sources.
- Cross-Hatching represents predicted interference to WRDW-TV from the proposed DTV WIS(TV) facility.

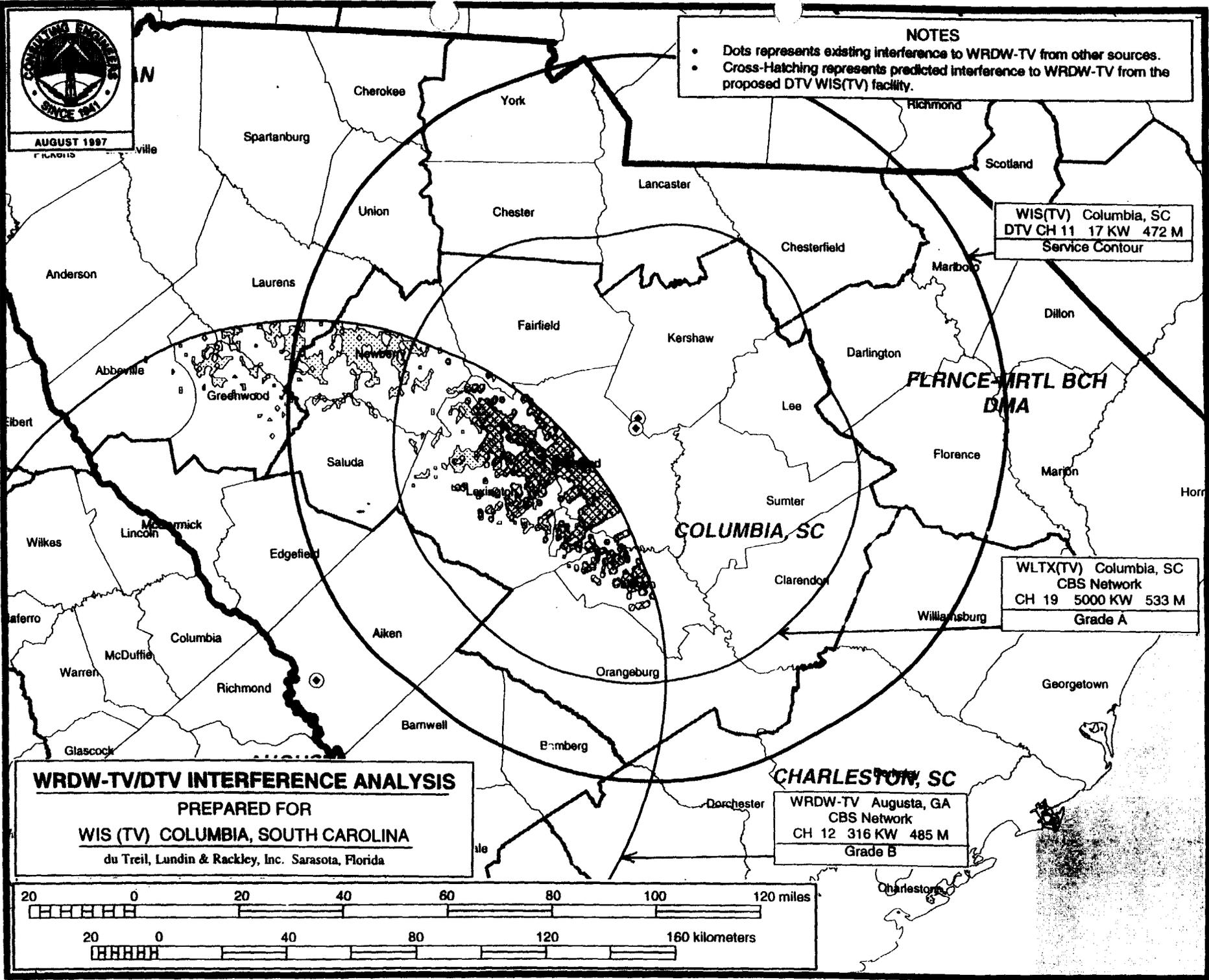


Figure 5



Attachment B

KAIT(TV) Manager's Statement



Box 790 • 472 CRAIG 766
Jonesboro, Arkansas 72403
501-931-8888
General Fax: 501-931-1371
News Fax: 501-933-8058

September 15, 1997

TO: Steve Smith

FM: Clyde Anderson

RE: DTV Interference - Memphis Channel 10

Based on research regarding household viewership in counties where we find interference is projected to occur between the NTSC signal on Channel 10, WKNO in Memphis and Channel 9 DTV for KAIT in Jonesboro, Arkansas we have reached the following observations:

Memphis Market:

According to engineering studies performed du Treil, Lundin & Rackley, Inc. the number of people in Poinsett County that will be affected by some level of interference will be so infinitesimally small it is hard to calculate. According to the A.C.Nielsen Company the total number of homes in the Memphis DMA is just a little over 606,000 homes. The one county where there was a discovery of possible interference contains 9,020 homes. This accounts for **0.0148 percent** of the total DMA homes.

The engineering study conducted by du Treil, Lundin & Rackley estimate that approximately 127 homes could be affected. This amounts to **0.0002 percent** of the total Memphis DMA homes. In taking only Poinsett county with 9,020 total homes with 127 affected homes this calculates to approximately **0.0140 percent** affected.

Of the 9,020 homes in that county approximately 62% are hooked to a cable system thereby leaving approximately 3,428 homes to rely on an outside antenna system. A study conducted by Audience Research & Development in March 1996 indicated that the rural area of Northeast Arkansas has a 15% penetration of home satellite systems. This means that another 1,350 homes have means other than an antenna or cable to receive television programs.

With Poinsett county being the only county that would have an interference clash between the NTSC channel 10 and DTV channel 9 there is another source of programming for the Public Broadcast System in East and Northeast Arkansas, KTEJ channel 19, the Conway, Arkansas, based statewide ETV network. The Arkansas network duplicates a lot of the Memphis programming.

While WKNO reaches an average of approximately 104 homes during an average quarter hour on a sign on to sign off basis Sunday through Saturday while KTEJ reaches 153 homes during the same period.

In looking at specific dayparts we find that in the critical afternoon period with news and with primetime viewing (5PM-7PM) WKNO had no measurable audience viewing.

In the daytime hours from 9AM-3PM WKNO was shown by the Nielsen Company to have an daily average quarter hour reach of 16 homes. This amounts to **0.0017 percent** of the county and a non-measurable amount of the entire Memphis DMA. (16 / 606,000)

In the critical 5PM -7PM time period where WKNO reaches no homes KTEJ reaches from 82 homes to a high of 152 homes. This indicates a preference for the Arkansas PBS station in the county.

Summary:

KAIT has a long history of News, Weather and Sports in the Northeast and Eastern portions of Arkansas. The people in Poinsett County count on KAIT. While this county is assigned to the Memphis market KAIT is the single most viewed station that penetrates the county.

52% of the viewers in that county regularly watch KAIT for the 6PM news compared to 7 Memphis stations that combine for only and aggregate 14% at 6PM. In the critical late news 53% of the county population watches the KAIT 10PM newscast on a regular basis compared to only 20% of aggregate viewing by the population watching 7 stations in Memphis.

We firmly believe that the impact of the FCC assigning KAIT the DTV channel 9 will have such a minimal impact that it will almost be impossible to detect. With the small percentages of affected viewers being *only a fractional part of 1%* it becomes *de minimis*.

With the availability of the Arkansas Educational Television station KTEJ, any viewer who might have an interference problem will be able to receive the Arkansas PBS station as a substitute. The tower location of the Arkansas Educational station is approximately less than 30 kilometers or 18 air miles from the possible interference area as determined by du Treil, Lundin & Rackley, Inc. engineering. The distance from the Memphis educational station tower would be in excess of 90 kilometers or 60 air miles from the possible interference area. If any interference exist it is in a rural area not served by a cable system and reception should be obtained by outside/inside antenna. If this is the case, then the Arkansas side signal should afford the more reliable signal.

**ANALYSIS OF DTV INTERFERENCE
CAUSED BY KAIT DTV CHANNEL 9**

	<u>KAIT</u>	<u>WKNO</u>	<u>KTEJ</u>
Total households viewed in affected county: Quarter hour average percentage sign on to sign off in an average day.	58%	12%	10%
Total households viewed in affected county Quarter hour average percentage sign on to sign off in an average week.	81%	27%	31%

We firmly believe that with this information the FCC should grant our request.

Source: Nielsen Station Index
County Coverage Study 1997

According to the A.C.Nielsen county by county coverage study for 1997 that was issued in July we found the following information relating to WKNO's coverage in Poinsett county, being the county in contention for interference:

WKNO had an average quarter hour audience, Monday - Friday, 7AM-1AM, sign on to sign off of only 104 homes or a 3% share of the total television audience.

In looking at specific dayparts we find that in the critical afternoon news and primetime viewing areas (5PM-7PM) that they had no measurable audience.

In the daytime hours from 9AM-3PM the rating book allocated approximately 16 homes to the average quarter hour viewing audience.

A further examination of the same rating book reveals that the Arkansas educational station reached approximately 165 homes in Poinsett county on an average quarter hour viewing as compared to WKNO's 16 homes.

In the critical early fringe daypart time period where KAIT reaches a peak viewing of approximately 2,800 homes, WKNO reaches a zero. KTEJ, the Arkansas ETV station reaches 152 homes.

In this rating book the Arkansas ETV station out performs the Memphis WKNO station in five of the eight daypart summaries listed in the July county by count rating book. Obviously more people in Poinsett refer the Arkansas station.

Attachment C

WSFA(TV) Chief Engineer's Data

COUNTY ANALYSIS OF DTV INTERFERENCE CAUSED BY WSFA DTV CHANNEL 11

WTOK MERIDIAN, MS

AFFECTED COUNTY (du TREIL)	TOTAL POPULATION (US CENSUS)	POPULATION AFFECTED (du TREIL)	PERCENT AFFECTED	TV HOUSEHOLDS (NIELSEN)	TOTAL VIEWERSHIP (NIELSEN)	PERCENT OF VIEWERSHIP (NIELSEN)	PEOPLE PER HOUSEHOLD	TOTAL HOUSEHOLDS AFFECTED	TOTAL VIEWING HOUSEHOLDS AFFECTED	PERCENT VIEWING HOUSEHOLDS AFFECTED
GREEN, AL	10,144	988	9.7%	3,390	137	4.0%	3.0	328.8	13.3	0.4%
MARENGO, AL	23,567	781	3.3%	8,100	268	3.3%	2.9	267.3	8.8	0.1%
SUMTER, AL	16,441	2,721	16.5%	5,640	655	11.6%	2.9	930.6	108.1	1.9%
CHOCTAW, AL	16,108	4,278	26.5%	5,700	516	9.1%	2.8	1,510.5	136.7	2.4%
CLARK, AL	28,183	206	0.7%	9,660	84	0.9%	2.9	67.6	0.6	0.0%
PICKENS, AL	20,958	164	0.8%	7,660	0	0.0%	2.7	61.3	0.0	0.0%
WASHINGTON, AL	17,205	207	1.2%	5,750	690	12.0%	3.0	69.0	8.3	0.1%
WAYNE, MS	19,694	797	4.0%	6,930	3,049	44.0%	2.8	277.2	122.0	1.8%
NOXUBEE, MS	12,568	413	3.3%	3,850	1,348	35.0%	3.3	127.1	44.5	1.2%
JASPER, MS	17,353	19	0.1%	6,020	3,552	59.0%	2.9	6.0	3.6	0.1%
WINSTON, MS	19,605	21	0.1%	8,920	2,076	30.0%	2.8	6.9	2.1	0.0%
KEMPER, MS	10,265	238	2.3%	3,450	2,726	79.0%	3.0	79.4	62.7	1.8%
TOTALS	212,091	10,833	5.1%	73,070	15,101	24.0%	2.9	3,731.7	497.3	0.8%

COUNTY ANALYSIS OF DTV INTERFERENCE CAUSED BY WSFA DTV CHANNEL 11

WFSU TALLAHASSEE, FL

AFFECTED COUNTY (du TREIL)	TOTAL POPULATION (US CENSUS)	POPULATION AFFECTED (du TREIL)	PERCENT AFFECTED	TV HOUSEHOLDS (NIELSEN)	TOTAL VIEWERSHIP (NIELSEN)	PERCENT OF VIEWERSHIP (NIELSEN)	PEOPLE PER HOUSEHOLD	TOTAL HOUSEHOLDS AFFECTED	TOTAL VIEWING HOUSEHOLDS AFFECTED	PERCENT VIEWING HOUSEHOLDS AFFECTED
JACKSON, FL	43,077	18,823	43.7%	15,250	1,983	13.0%	2.8	6,863.7	866.5	5.7%
WASHINGTON, FL	18,131	458	2.5%	7,180	0	0.0%	2.5	180.9	0.0	0.0%
BAY, FL	140,372	6,209	4.4%	55,090	0	0.0%	2.5	2,436.8	0.0	0.0%
CALHOUN, FL	11,631	93	0.8%	4,210	547	13.0%	2.8	33.7	4.4	0.1%
SEMINOLE, GA	9,271	4,173	45.0%	3,137	126	4.0%	3.0	1,412.0	56.7	1.8%
DECATUR, GA	26,424	522	2.0%	9,340	1,401	15.0%	2.8	184.5	27.7	0.3%
GRADY, GA	21,226	223	1.1%	7,850	628	8.0%	2.7	82.5	6.6	0.1%
THOMAS, GA	40,402	817	2.0%	15,220	0	0.0%	2.7	307.8	0.0	0.0%
EARLY, GA	12,122	39	0.3%	4,220	0	0.0%	2.9	13.6	0.0	0.0%
MILLER, GA	6,235	377	6.0%	2,250	0	0.0%	2.8	136.0	0.0	0.0%
HOUSTON, AL	83,967	200	0.2%	37,000	0	0.0%	2.3	88.1	0.0	0.0%
TOTALS	412,858	31,934	7.73%	160,727	4,685	2.9%	2.7	11,539.5	961.9	0.7%

COUNTY ANALYSIS OF DTV INTERFERENCE CAUSED BY WSFA DTV CHANNEL 11

WXIA ATLANTA, GA

AFFECTED COUNTY (du TREIL)	TOTAL POPULATION (US CENSUS)	POPULATION AFFECTED (du TREIL)	PERCENT AFFECTED	TV HOUSEHOLDS (NIELSEN)	TOTAL VIEWERSHIP (NIELSEN)	PERCENT OF VIEWERSHIP (NIELSEN)	PEOPLE PER HOUSEHOLD	TOTAL HOUSEHOLDS AFFECTED	TOTAL VIEWING HOUSEHOLDS AFFECTED	PERCENT VIEWING HOUSEHOLDS AFFECTED
BARTOW, GA	63,732	391	0.6%	23,060	16,373	71.0%	2.8	141.5	100.4	0.4%
CAROLL, GA	77,977	4,883	6.3%	28,110	20,801	74.0%	2.8	1,760.3	1302.6	4.6%
COWETA, GA	72,021	567	0.8%	26,490	21,192	80.0%	2.7	208.5	166.8	0.6%
FLOYD, GA	83,935	30	0.0357%	31,150	21,182	68.0%	2.7	11.1	7.6	0.0%
HARALSON, GA	23,378	3,324	14.2%	8,810	5,638	64.0%	2.7	1,252.6	801.6	9.1%
HEARD, GA	9,573	1,281	13.4%	3,550	2,911	82.0%	2.7	475.0	389.5	11.0%
JASPER, GA	9,168	57	0.6%	3,130	1,377	44.0%	2.9	19.5	8.6	0.3%
LAMAR, GA	13,797	965	6.9%	4,920	3,001	61.0%	2.8	340.6	207.7	4.2%
JONES, GA	22,077	145	0.7%	7,890	1,184	15.0%	2.8	51.8	7.8	0.1%
MERIWETHER, GA	23,041	1,358	5.9%	7,640	6,265	82.0%	3.0	450.3	369.2	4.8%
MONROE, GA	18,950	282	1.5%	6,630	2,519	38.0%	2.9	98.7	37.5	0.6%
PIKE, GA	11,441	587	5.1%	4,020	3,658	91.0%	2.8	206.3	187.7	4.7%
POLK, GA	34,771	1,541	4.4%	13,020	10,286	79.0%	2.7	577.0	455.9	3.5%
TROUP, GA	57,882	3,968	6.9%	21,180	9,319	44.0%	2.7	1,452.0	638.8	3.0%
UPSON, GA	26,961	2,045	7.6%	10,140	4,867	48.0%	2.7	769.1	369.2	3.6%
TOTALS	548,704	21,414	3.90%	199,740	130,573	65.4%	3.0	7,814.3	5051.0	3.6%

Attachment D

WIS(TV) Manager's Statement



Memorandum

To: Steve Smith
From: John Cottingham
Date: October 2, 1997
Re: WIS DTV Channel 11 Interference Study

WIS broadcasting on DTV Channel 11 is anticipated to impact the markets of WTOC (Savannah), WRDW (Augusta), or WTVD (Raleigh-Durham). The following is a synopsis of the potential interference to those areas.

WTOC - Savannah

Potential interference to WTOC's NTSC signal in five counties would only affect a maximum of 2.6% of the 65,580 homes in those counties at any given time; in other words, the maximum possible interference is to 1,685 homes. Furthermore, research indicates the interference would impact a maximum of 0.9% of WTOC's total DMA viewers. In addition, cable penetration in the five counties ranges from 43% to 45% in four counties to a high of 95% in one county, for an average of 73%.

WRDW - Augusta

Potential interference to WRDW's NTSC signal in Lexington and Richland counties (both part of the Columbia Metro) would affect a maximum of 0.2% of the 180,680 homes in those counties at any given time; in other words, the maximum possible interference is to 299 homes. Furthermore, research shows the interference would also impact a maximum of 0.2% of WRDW's total DMA viewers. In addition, cable penetration in the two counties averages 62.0%.

WTVD - Raleigh-Durham

Potential interference to WTVD's NTSC signal in nine counties would only affect a maximum of 2.3% of the 184,670 homes in those counties at any given time; in other words, the maximum possible interference is to 3,341 homes; of the three counties within the Raleigh DMA, the maximum possible interference is to 5.6% of those homes. Furthermore, research indicates this interference would impact a maximum of 0.6% of WTVD's total DMA viewers. In addition, cable penetration in the nine counties ranges from a low of 38% to a high of 79%, for an average of 50%.

Summary

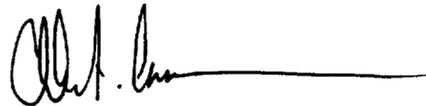
WIS has had a long history of News, Weather and Sports coverage and service to the people of South Carolina beyond our DMA. We believe the impact of the FCC assigning WIS channel 11 for DTV has minimal effect on viewers of the stations in Savannah, Augusta and Raleigh-Durham, and allows WIS to continue to be a regional source of information to people in South Carolina. We believe the FCC should grant our request.

Attachment E
Technical Statement

TECHNICAL STATEMENT
COSMOS BROADCASTING CORPORATION

Cosmos Broadcasting Corporation is requesting the substitution of the presently assigned DTV channels for several of the stations where Cosmos is the licensee. However, as the industry is awaiting further field testing of the DTV transmission system to be completed, Cosmos cannot fully evaluate the predicted service areas of both the FCC assigned channel and the Cosmos proposed DTV channel. The principal field test data Cosmos is awaiting is the implementation of adjacent channel DTV to NTSC transmission, the limitations of DTV reception employing inside antennas and the comparisons between different DTV receivers.

As most of the channel substitutions Cosmos is requesting involves an adjacent channel DTV to NTSC assignment, Cosmos is awaiting further industry testing of the adjacent channel stations. Additionally, extensive testing of DTV reception employing indoor antenna antennas has not been completed. Cosmos is also requesting further testing with different DTV receivers confirming the desired-to-undesired ratios used by the Commission within the allotment process.



Charles A. Cooper

October 1, 1997

du Treil, Lundin & Rackley, Inc.
240 North Washington Blvd., Suite 700
Sarasota, Florida 34236
941.366.2611

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Reply of Cosmos Broadcasting Corporation was sent by first-class mail, postage prepaid, this 3rd day of October, 1997, to each of the following:

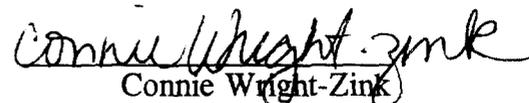
Alan C. Campbell, Esq.
Tara S. Becht, Esq.
Irwin, Campbell & Tannenwald
1730 Rhode Island Ave., NW, Suite 200
Washington, DC 20036
Counsel for Diversified Communications

Robert A. Beizer, Esq.
Gray Communications Systems, Inc.
1201 New York Avenue, NW, Suite 1000
Washington, DC 20005
Counsel for WRDW Licensee Corporation

John E. Fiorini III, Esq.
Gardner, Carton & Douglas
1301 K Street, NW, Suite 900E
Washington, DC 20005
Counsel for Raycom-U.S., Inc.

Benjamin J. Griffin
Robert L. Galbreath
Reed Smith Shaw & McClay LLP
1301 K Street, NW
Suite 1100 - East Tower
Washington, DC 20005
*Counsel for Pacific and Southern Company,
Inc.*

Malcom G. Stevenson
Schwartz, Woods & Miller
1350 Connecticut Ave., NW, Suite 300
Washington, DC 20036
*Counsel for Mid-South Public Communications
Foundation*


Connie Wright-Zink