14. The Longley-Rice coverage areas that appear on the maps were produced by DataWorld, a highly respected firm that provides services to the broadcast industry. Under my direction, DataWorld used the most recent version of Longley-Rice provided by the Institute for Telecommunications Services, (Version 1.2.2), in creating the maps. I have personally run Longley-Rice analyses for many of the 43 stations and confirmed the Longley-Rice propagation areas produced by DataWorld.

15. Subscriber locations by geographic coordinates were first determined for as many subscribers as possible. To ensure maximum accuracy, this "geocoding" process was done only for subscribers whose addresses could be identified with a high level of precision. (For example, pinpointing the location of a subscriber is not possible when provided only a Post Office box as an address.) Then, with the aid of a computer program, those coordinates were employed to plot on the maps the locations of subscribers in areas where either the FCC method or the Longley-Rice method predicted field intensities of Grade A and Grade B or better. This procedure provides a ready source for predicting the locations of households that are likely to have available signal strength of at least Grade B intensity from a local network affiliate.

16. Review of the maps shows that large numbers of new PrimeTime 24 subscribers are located in areas where the relevant CBS or Fox station has predicted field

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distances for one degree of either latitude or longitude. Since at high or low latitudes that projection appears to make a circular plot elliptical, an Albers Equal Area Projection was used for stations in Florida and North Dakota. The use of a particular projection does not affect the relationship of the locations of subscribers to the level of service because identical projection assumptions were made for plotting both.

intensity, using a Longley-Rice analysis, in excess of Grade B. (At my direction, the maps include a box setting forth relevant statistics for each station.) As these maps show, PrimeTime 24 has large numbers of customers within the predicted Grade A contours (and the Grade A coverage area predicted by Longley-Rice) of every station mapped.[2]

17. At the outer margins of the Longley-Rice Grade B area, or at the FCC predicted Grade B contour, at least 50% of the locations are predicted to receive at least a Grade B intensity signal at least 50% of the time. As one comes in from the border, those percentages become still higher. For example, within the predicted Longley-Rice Grade A area or FCC predicted Grade A contour, more than 70% of the locations are predicted to receive a signal of at least Grade B intensity at least 90% of the time.

Determination of the Locations of Individual Subscribers

18. Under my direction, Decision Support Services used a standard computer process called "geocoding" to determine the locations of the PrimeTime 24 subscribers shown on the attached maps. Geocoding is a widely used procedure for

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[2] These maps show only one station at a time. As a result, in a few instances there appear to be clusters of subscribers at the outer edge of a station's coverage area. In fact, these are subscribers in nearby cities whose television stations' coverage areas are not shown on the map. For example, in the map of the Toledo CBS station, WTOL, there is a concentration of subscribers to the north of Toledo; these subscribers live in the Detroit area, which, of course, has its own local station. Similar clusters appear on the maps for Milwaukee (reflecting subscribers in the Chicago area); for Winston-Salem, North Carolina (reflecting subscribers in the Raleigh-Durham and Charlotte areas); for Cedar Rapids, Iowa. (reflecting subscribers in the Dubuque area); for Colorado Springs (reflecting subscribers in the Denver area); and for Columbus, Georgia (reflecting subscribers in the Atlanta area).

pinpointing particular locations by determining their specific latitude and longitude. (For example, the FCC relies on latitudes and longitudes for particular Census Bureau population blocks in determining whether digital television coverage areas will replicate current analog coverage areas in terms of the number of persons covered.) The latitude and longitude data for individual addresses are derived from data about the locations of population blocks across the United States.

19. The geocoding process is readily available to the public through the World Wide Web. I attach as Exhibit C maps printed out from a service called "Yahoo: Maps," showing the location of a PrimeTime 24 subscriber in the Miami area. The maps show first a close-up view, then views showing wider areas, then a view showing the location of this subscriber in relation to the entire Miami area.

20. The computer program that Decision Support Services used to geocode the subscribers is Centrus ACM. I have used Centrus ACM on my own computer to geocode a number of addresses. I have checked the accuracy of the geocoding against standard topographical maps for a number of different addresses and found them to be accurate.

21. Under my direction, Decision Support Services has also taken the subscriber lists produced by PrimeTime 24 and arranged them by Zip Code in which the individual subscriber is located. These lists confirm what the maps described above show: that PrimeTime 24 has large numbers of subscribers in urban and suburban locations near the towers of local CBS and Fox stations, in which Longley-Rice predicts

that the subscribers will be able to receive at least a Grade B signal -- and often a Grade A or stronger signal -- over the air. The total list, which includes hundreds of thousands of entries, has been recorded on CD ROM. A sample of the list, including only subscribers in Dade and Broward Counties, is attached as Exhibit D.

Conclusion With Respect to Maps

22. The analysis just described demonstrates that the great majority of PrimeTime 24's subscribers within the predicted Grade B contours of CBS and Fox stations are capable of receiving a signal of at least Grade B intensity from a local CBS and Fox station with a conventional outdoor rooftop receiving antenna.

Testing of Randomly Selected Subscribers in Various Cities

23. To supplement the predictions made by the Longley-Rice maps, I have asked counsel to retain the consulting engineering firm of Moffett, Larson & Johnson (MLJ) to determine actual field intensities at randomly selected PrimeTime 24 subscriber locations in four markets: (a) the Miami area (Dade and Broward counties); (b) Charlotte, North Carolina, (c) Pittsburgh, Pennsylvania, and (d) Baltimore, Maryland. MLJ is a firm respected by professional engineers and the broadcasting community for its long history of competent engineering performance. In each area, approximately 100 PrimeTime 24 subscribe. households were tested.

24. I am familiar with the procedures that MLJ used for conducting signal intensity measurements and have conducted many such measurements myself. For

example, I conducted such measurements as part of my work as Chairman of the Field Testing Task Force for the Advisory Committee on Advanced Television Systems.

25. I selected Charlotte, North Carolina, as a market in which to test randomly selected subscribers because it was the market we had chosen for use in conducting tests in connection with the Advisory Committee on Advanced Television Systems. (In fact, PrimeTime 24 had specifically mentioned Charlotte as an appropriate location for conducting signal intensity tests. See Defendant's Objections, Aug. 1, 1997, at 38.) I selected Baltimore because, like Charlotte, the terrain surrounding Baltimore is typical of many markets across the country, including both reasonably flat terrain in some directions and hilly terrain in others.

26. I selected Pittsburgh, Pennsylvania not because it is a typical television market but because its terrain makes it one of the most difficult markets in the United States for over-the-air television broadcasting. Although Pittsburgh is highly atypical, I chose it, and had the testing performed on a UHF station (the Pittsburgh Fox affiliate) to show an extreme condition. The short wavelengths of UHF television stations produce higher diffraction propagation losses over terrain barriers than the longer wavelengths of VHF television stations. UHF stations therefore experience greater difficulty than VHF stations in serving the households in Pittsburgh. Selection of the Fox UHF station for test rather than the CBS VHF station constituted a "worst case" situation.

27. I also selected particular stations to be tested that span the range of different frequencies. In Miami, the stations tested were WFOR (CBS - Channel 4) and

WSVN (Fox - Channel 7). In Charlotte, the station tested was WBTV (CBS - Channel 3) and, for subscribers toward the edge of the Charlotte market, other CBS stations that provide coverage in that market. In Pittsburgh, the stations tested were WPGH (CBS - Channel 53) and, in appropriate cases, another CBS station, WWCP, Johnstown, Pennsylvania, that provides coverage in that market. In Baltimore, the station tested was WJZ (CBS - Channel 13), and, in appropriate cases, other CBS stations that provide coverage in that market.[3]

28. The method for randomly selecting subscribers to be tested was as follows:

a. Miami area: The Miami measurements were conducted in early 1997. Measurements were made at 100 locations randomly selected from new May, 1996, PrimeTime 24 subscribers in Dade and Broward Counties who received a distant CBS station. From a listing of 800 subscribers, every eighth entry was selected for the 100-location sample. At each of the 100 locations, measurements were made of the signal intensity of WFOR-TV, the CBS-owned station operating on Channel 4, and WSVN(TV), the Fox network affiliated station operating on Channel 7. In both cases, the community of license is Miami.

b. Charlotte, Pittsburgh, and Baltimore. Because these tests were done in early 1998, more subscriber data were available in electronic form. In each

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3/ I directed that other nearby stations be tested in appropriate cases because the Satellite Home Viewer Act defines an unserved household as one that cannot receive "a" station of a particular network.

case, I asked Decision Support Services to create a list of all PrimeTime 24 subscribers who received programming of the network in question (CBS or Fox) and who lived within the FCC predicted Grade B contour from the local network affiliate. I directed Decision Support Services to include all subscribers whose addresses could be geocoded at least to a 9-digit Zip Code centroid within the predicted FCC Grade B contour, or whose 5-digit Zip Code is entirely within the station's predicted FCC Grade B contour. The same statistical expert, Prof. Sudman, then directed the random selection of approximately 100 subscribers in each case. Lists of the randomly selected subscribers in each of the four markets (Miami, Charlotte, Pittsburgh, and Baltimore) are attached as Exhibit E.

29. I directed that the measurement procedure be based on that prescribed by the FCC in 47 C.F.R. § 73.686. On the street in front of the household (or the nearest accessible road), a mobile run for a distance of 100 feet was made with a conventional rooftop antenna elevated to 30 feet[4], while recording the station's field intensity and storing the data in a computer. Analysis of the data, made with the aid of a computer program, permitted the extraction of the maximum, minimum, and median field intensity found, together with the standard deviation.[5]

4/ At some locations in the Baltimore/Washington area, the prevalence of heavy tree coverage prevented measurements at 30 feet above ground in the vicinity of subscriber addresses. At those locations, the receiving antenna was approximately 12 feet above ground. No adjustment has been made in the field strength results to reflect the low receiving antenna height.

5/ Standard deviation is a statistical concept providing a measure of the variability of the data. In mathematical terms, it is the square root of the arithmetic average of the squares of the deviation from the mean (average) of the data collected.

30. The goal of this measurement procedure is to obtain reliable data about the intensity of the station's signal in the air near the household. By conducting a 100-foot run, it is possible to gather as many as a thousand or more data points, which provides a sound basis for determining the likely signal intensity above the household's rooftop. It is not feasible to take measurements above the household's rooftop, much less to carry out a 100-foot run at that location. Although gathering some data in the household's driveway using a "cluster" method might be possible (after a potentially lengthy process of obtaining permission from a homeowner, who may be hostile), the FCC has indicated that use of a 100-foot run is preferable to a "cluster" approach. See 47 C.F.R. § 686. The "cluster" method yields much less data, and is therefore less reliable than the 100-foot run. Measurements taken at a few points in the household's driveway are not more likely to be representative of the signal strength above the rooftop than a sample of hundreds of measurements taken on the street in front of the residence.

31. Results of the measurement program are provided in accompanying tabulations (Exhibits F, G, H, I, J, K, L, and M). Maximum, minimum, and median field intensities are provided for each location. Also shown are the standard deviations and the median field intensity minus the standard deviation. Median field intensity minus standard deviation (which I refer to as "adjusted field strength") is a measure of the least signal intensity likely to be found at the specific location of the household. This measure is more conservative than use of the median, on which the FCC measurement method in 47 C.F.R. § 686 relies.

32. Summary of Miami results. At each of the 100 locations, measurements were made of the field intensity of both WFOR-TV and WSVN. All 200 measurements showed adjusted field strength to be greater than Grade B. The excess of adjusted field strength over Grade B ranged from a minimum of 2.3 times to a maximum of 1,580 times. On average, these households received a signal 74 times stronger than the Grade B minimum for WFOR, and 69 times stronger than the Grade B minimum for WSVN. Of the 100 locations tested, 95 received a signal of at least Grade A intensity from WFOR, and 99 received a signal of at least Grade A intensity from WSVN.

33. Summary of Charlotte results. MLJ tested 101 randomly selected PrimeTime 24 subscribers within the predicted Grade B contour of WBTV (CBS), Channel 3, in Charlotte. Of these locations, 91, or 90.1% were measured to have an adjusted field strength of at least Grade B intensity from WBTV. Of the 10 locations that did not have an adjusted field strength of at least Grade B intensity from WBTV, eight had an adjusted field strength of at least Grade B intensity from another CBS station. In other words, 99 out of 101, or 98%, had an adjusted field strength of at least Grade B intensity from a CBS station. Of the 101 locations tested in the Charlotte area, 57, or 56.4%, had an adjusted field strength of at least Grade A intensity from WBTV, and a total of 65, or 64.3%, had an adjusted field strength of at least Grade A intensity from either WBTV or another CBS station.

34. Summary of Pittsburgh results. MLJ tested 104 randomly selected PrimeTime 24 subscribers within the predicted Grade B contour of WPGH (Fox), Channel 53 in Pittsburgh. Of these locations, 57, or 55%, were measured to have an

adjusted field strength of at least Grade B intensity from WPGH. Of the locations that did not have an adjusted field strength of at least Grade B intensity from WPGH, four had an adjusted field strength of at least Grade B intensity from another Fox station. In other words, 61 out of 104, or 59%, had an adjusted field strength of at least Grade B intensity from a Fox station. Of the 104 locations, 36, or 35%, had an adjusted field strength of at least Grade A intensity from WPGH, another Fox station, or both.

35. Summary of Baltimore results. MLJ tested 106 randomly selected PrimeTime 24 subscribers within the predicted Grade B contour of WJZ (CBS), Channel 13 in Baltimore. Of these locations, 63, or 59%, were measured to have an adjusted field strength of at least Grade B intensity from WJZ. Of the locations that did not have an adjusted field strength of at least Grade B intensity from WJZ, 33 had an adjusted field strength of at least Grade B intensity from another CBS station. In other words, 96 out of 106, or 91%, had an adjusted field strength of at least Grade B intensity from a CBS station. Of the 106 locations, 57, or 54%, had an adjusted field strength of at least Grade A intensity from WJZ, another CBS station, or both.

Conclusion With Respect to Actual Signal Intensity Measurements

36. The actual signal intensity measurements conducted at randomly selected subscriber locations in four different markets confirm what the Longley-Rice maps show: that the overwhelming majority of new subscribers that PrimeTime 24 has signed up within the FCC-predicted Grade B contours of CBS and Fox stations are in fact capable of

receiving a signal of Grade B intensity with a conventional rooftop antenna, and are therefore not "unserved households" under the SHVA.

37. Data or other information I considered in forming the opinions articulated above include the following:

A. The definition of "unserved household" in the Satellite Home Viewer Act, 17 U.S.C. § 119(d)(10)(A).

B. Rules and Regulations of the FCC -- in particular 47 C.F.R. § 73.683(a) and § 73.686.

C. A Longley-Rice computer program supplied by EDX Engineering, Inc.

D. FCC OET Bulletin No. 69, Longley-Rice Methodology for Evaluating TV Coverage and Interference, July 2, 1997.

E. Maps created under my direction by Decision Support Services and DataWorld.

F. PrimeTime 24 subscriber lists as tabulated by Decision Support Services from listings supplied to CBS and Fox by DirecTV and PrimeTime 24.

G. Random number selection provided by Professor Sudman.

H. The Centrus ACM program for geocoding.

I Tabulations of measurement data produced under my direction by Moffett, Larson and Johnson.

36. In addition to my work in this case, I have testified within the past four years in one other court case: ABC, Inc. v. PrimeTime 24, pending in Greensboro, North Carolina (deposition). I have testified also in a FCC hearing during the past year in a case involving a revocation of license for a FM translator. Gerard A. Turro, MM Docket No.97-122.

35. I am charging my standard rate of $175 per hour for my work in this matter.

Executed on April 15, 1998

Jules Cohen

Jules Cohen, P.E.

Jules Cohen, P.E.
Consulting Engineer

PROFESSIONAL BACKGROUND OF JULES COHEN

Jules Cohen received the degree of Bachelor of Science in Electrical Engineering from the University of Washington (Seattle) in 1938. His first professional experience was with consulting engineering firms in the city of Seattle, then with the Bonneville Power Administration, a division of the U.S. Department of Interior, where he served as a junior engineer and assistant engineer in the substation design section. He was commissioned in the Navy in May of 1942 and served for three and one-half years as a naval officer during World War II. His duties included training at Harvard, at MIT and at the Naval Air Technical Training Center in Corpus Christi. He was a project officer on radar beacons at the Radiation Laboratory at MIT, then at the Bureau of Ships. Under the Commander, Service Forces, Pacific Fleet, he was in responsible charge of the radar beacon program for the Pacific Fleet. His last duty station in the Navy was as Executive Officer of the Electronics Division, Commander, Service Forces, Pacific Fleet.

Following release from the Navy, he entered the field of consulting engineering and has been so engaged for 52 years. During 45 of those 52 years, he has been either a sole principal, a partner, or an officer in a consulting engineering firm. He has been licensed to practice as a professional engineer in the District of Columbia since June of 1952, and has been licensed to practice in the field of electrical engineering as a certified professional engineer in the Commonwealth of Virginia since June of 1954. During the period of his professional practice, he has provided professional engineering services in the field of broadcasting, in particular, and communications, in general. On January 1, 1988, he retired from the presidency of Jules Cohen & Associates, P.C., but has continued providing professional consulting service to selected clients.

Over 10,000 projects of varying levels of complexity have been carried out by the engineering firm of which he was either sole member, partner or officer. Work performed has included radio-frequency propagation studies, interference studies, frequency allocation surveys, radiation hazard evaluations, antenna design and adjustment, television picture quality assessment, satellite earth station studies, the planning and placement of cellular and other communications structures, studio and transmitter plant layouts for both radio and television, equipment evaluation, and extensive work involving the engineering aspects of changes in the rules of the Federal Communications Commission (FCC).

He was the author of Appendix C of the 1975 Cable Television Advisory Committee Panel II report to the FCC. That Appendix dealt with the problem of echoes in television systems. He is also the author of the section on low power television in the 1986 edition of the McGraw-Hill Encyclopedia of Science and Technology. As chairman of the engineering committee concerned with interference to television broadcasting from noncommercial FM stations, he played a major role in the development of the rules adopted by the FCC governing the assignment of FM stations in the frequency band from 88.1 to 91.9 MHz. He represented television broadcast interests as co-chairman of the Technical Analysis Working Group of the Land Mobile Radio/UHF Television Technical Advisory Committee.

From the time of its inception in 1983 to 1996, Jules Cohen represented the Association for Maximum Service Television, Inc. (MSTV) in Subcommittees and Technology Groups of the Advanced Television Systems Committee (ATSC). He is currently the IEEE Broadcast Technology Society representative on the Executive Committee of the ATSC. As stated in its Charter, the purpose of ATSC

"[I]s to explore the need for and, where appropriate, to coordinate development of voluntary national technical standards for Advanced Television Systems."

He has participated as a member, co-chairman or vice chairman of a number of ATSC Technical Groups and is currently vice-chairman of the Technology Group on Distribution (T3) that has completed preparation of the specifications for a Digital Television Standard based on the Grand Alliance Advanced Television System, together with a Guide to its use.

His participation in the work of the Advisory Committee on Advanced Television Service (ACATS) began in November, 1987, the starting date set by the Federal Communications Commission, and continued until the completion of the Advisory Committee's work in November, 1995. He was a member of Working Parties 1 and 2 of the Systems Subcommittee (SS/WP-1 and 2), and Working Parties 3, 4 and 6 of the Planning Subcommittee (PS/WP-3, 4 and 6). Under SS/WP-2, he chaired the Field Testing Task Force. That Task Force completed field testing of the Grand Alliance Digital Television System in October, 1995. Mr. Cohen had a major role in preparing both the specifications for the field testing and preparation of the report following field testing. Under PS/WP-3, he chaired the Spectrum Analysis Working Group.

Clients have included all five of the major television networks (ABC, CBS, NBC, Fox and PBS), the National Association of Broadcasters, the Association for Maximum Service Television, the Electronic Industries Association, major group owners, individual radio and television stations, and Cellular System and Personal Communications System providers. He has also provided professional engineering services to community and citizen groups relative to the placement of broadcast or wireless communications facilities.

For more than twenty years, he has worked extensively in the field of nonionizing radiation effects. He has done research in the scientific literature devoted to the subject, participated in the Bioelectromagnetics Society Symposia held yearly from 1979 through 1995, completed courses in Hazardous Electromagnetic Radiation offered by the George Washington University, the Management of Electromagnetic Energy Hazards offered by Cook College, Rutgers University, and Electric and Magnetic Field Health Research: Assessing the Science, offered by the Harvard School of Public Health, attended meetings of the Electromagnetic Radiation Management Advisory Council, participated in Michaelson Research Conferences in 1994, 1995 and 1997, moderated panels on the Biological Effects of Nonionizing Radiation at the 1979, 1983 and 1988 annual conventions of the National Association of Broadcasters, delivered invited papers on the Biological Effects of Nonionizing Radiation in the 1979, 1984 and 1993 meetings of the Broadcast Technology Society of the Institute of Electrical and Electronics Engineers, and, by invitation, provided a critique of the first and second 1979 drafts and the 1985 draft of a RF/Microwave Criteria document of the National Institute for Occupational Safety and Health.

He was a member of American National Standards Institute (ANSI) Committee C95 that developed the 1982 ANSI Standard C95.1-1982 Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300 kHz to 100 GHz. He is a member of IEEE Standards Coordinating Committee 28 (SCC 28) and Subcommittee IV which completed a revision to ANSI Standard C95.1-1982 (now identified as IEEE C95.1-1991 or ANSI/IEEE C95.1-1992). Subcommittee IV is continuing evaluation of scientific literature for a possible further updating of the standard. He is a member of SCC 28 Subcommittee I that developed IEEE Standard C95.3-1991, IEEE Recommended Practice for the Measurement of Potentially Hazardous Electromagnetic Fields - RF and Microwave. He is a member of the IEEE Committee on Man and Radiation (COMAR). He is also a member of Committee 89-2 of the National Council on Radiation Protection and Measurements (NCRP). Committee. 89-2 has prepared NCRP Report No. 119, A

Practical Guide to the Determinations of Human Exposure to Radiofrequency Fields. Under contract to the National Association of Broadcasters, he prepared a suggested revision to FCC OST Bulletin No. 65, taking into account the ANSI/IEEE 1992 exposure guide.

He has been qualified as an expert witness in Federal court, other courts, local boards and councils, and in hearings before the FCC and FAA. Most recently, his expert testimony was accepted in the United States District Court for the Southern District of Florida in the matter of CBS, Inc. *et al* v. PrimeTime 24 Joint Venture, C.A. No. 96-3650-CIV-Nesbitt.

He is a member of Tau Beta Pi, engineering scholastic honorary, a member of the National Society of Professional Engineers, a Life Fellow of the Institute of Electrical and Electronics Engineers, a Life Fellow of the Society of Motion Picture and Television Engineers, a charter member of the Bioelectromagnetics Society, a past president of the Association of Federal Communications Consulting Engineers and former chairman of that association's Radiation Hazard Subcommittee. He was selected for the 1988 Engineering Achievement Award of the National Association of Broadcasters and a 1990 Achievement Award of the Broadcast Pioneers Washington, D.C. chapter.

December 19, 1997

STATIONS MAPPED

CBS or FOX STATIONS IN TOP 15 MARKETS

1. WCBS, Channel 2, New York, NY (CBS)
2. KTTV, Channel 11, Los Angeles (Fox)
3. WBBM, Channel 2, Chicago (CBS)
4. WTXF, Channel 29, Philadelphia (Fox)
5. KTVU, Channel 2, San Francisco-Oakland, CA (Fox)
6. WBZ, Channel 4, Boston, MA (CBS)
7. WTTG, Channel 5, Washington, D.C. (Fox)
8. KTVT, Channel 11, Dallas-Fort Worth (CBS)
9. WJBK, Channel 2, Detroit, MI (Fox)
10. WGNX, Channel 46, Atlanta, GA (CBS)
11. KRIV, Channel 26, Houston, TX (Fox)
12. KSTW, Channel 11, Seattle, WA (CBS)
13. WJW, Channel 8, Cleveland, OH (Fox)
14. WCCO, Channel 4, Minneapolis-St. Paul (CBS)
15. WTVT, Channel 13, St. Petersburg-Tampa (Fox)

15 RANDOMLY CHOSEN STATIONS IN MARKETS 17-100

1. KTVI, Channel 2, St. Louis, MO (Fox)
2. KFMB, Channel 8, San Diego, CA (CBS)
3. WITI, Channel 6, Milwaukee, WI (Fox)
4. KUTV, Channel 2, Salt Lake City (CBS)
5. WVUE, Channel 8, New Orleans, LA (Fox)
6. WFMY, Channel 2, Greensboro-Winston-Salem (CBS)
7. WBRC, Channel 6, Birmingham, AL (Fox)
8. WOWK, Channel 13, Charleston-Huntington, WV (CBS)
9. WALA, Channel 10, Mobile-Pensacola, AL (Fox)
10. WTOL, Channel 11, Toledo, OH (CBS)
11. WDKY, Channel 56, Lexington, KY (Fox)
12. KOLR, Channel 10, Springfield, MO (CBS)
13. WZDX, Channel 54, Huntsville, AL - Decatur, FL (Fox)
14. KGAN, Channel 2, Cedar Rapids-Waterloo (CBS)
15. KKTV, Channel 11, Colorado Springs-Pueblo, CO (CBS)

5 RANDOMLY CHOSEN STATIONS IN MARKETS 101-211

1. WFXG, Channel 54, Augusta, GA (Fox)

2. WRBL, Channel 3, Columbus, GA (CBS)

3. KXMC, Channel 13, Minot-Bismarck, ND (CBS)

4. KIDY, Channel 6, San Angelo, TX (Fox)

5. WBKB, Channel 11, Alpena, MI (CBS)

ADDITIONAL STATIONS

1. WSVN, Channel 7, Miami, FL (Fox)

2. WPEC, Channel 12, West Palm Beach, FL (CBS)

3. WFLX, Channel 29, West Palm Beach, FL (Fox)

NAMED PLAINTIFF STATIONS

1. WJXT, Channel 4, Jacksonville, FL (CBS)

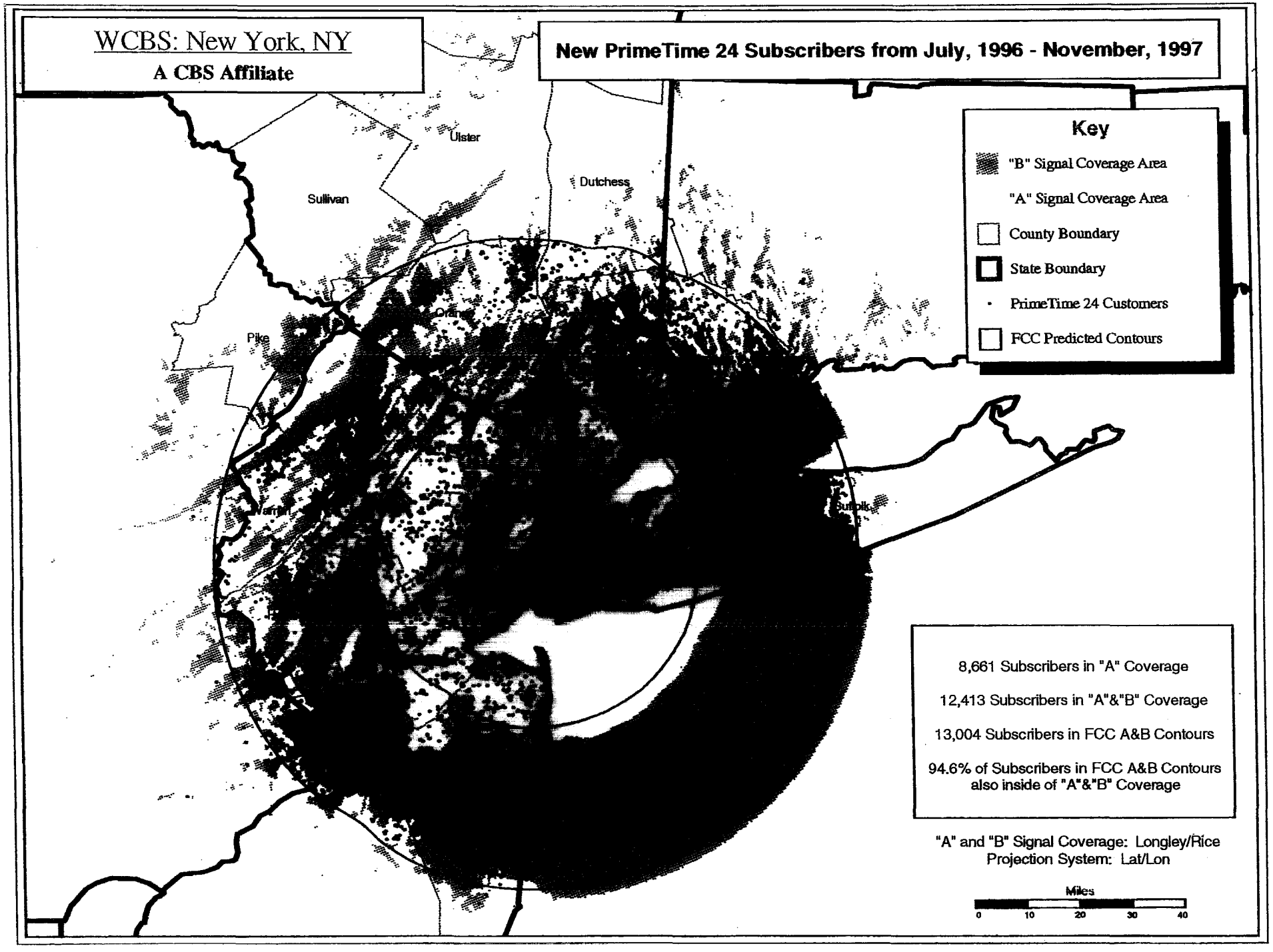
2. WFOR, Channel 4, Miami, FL (CBS)

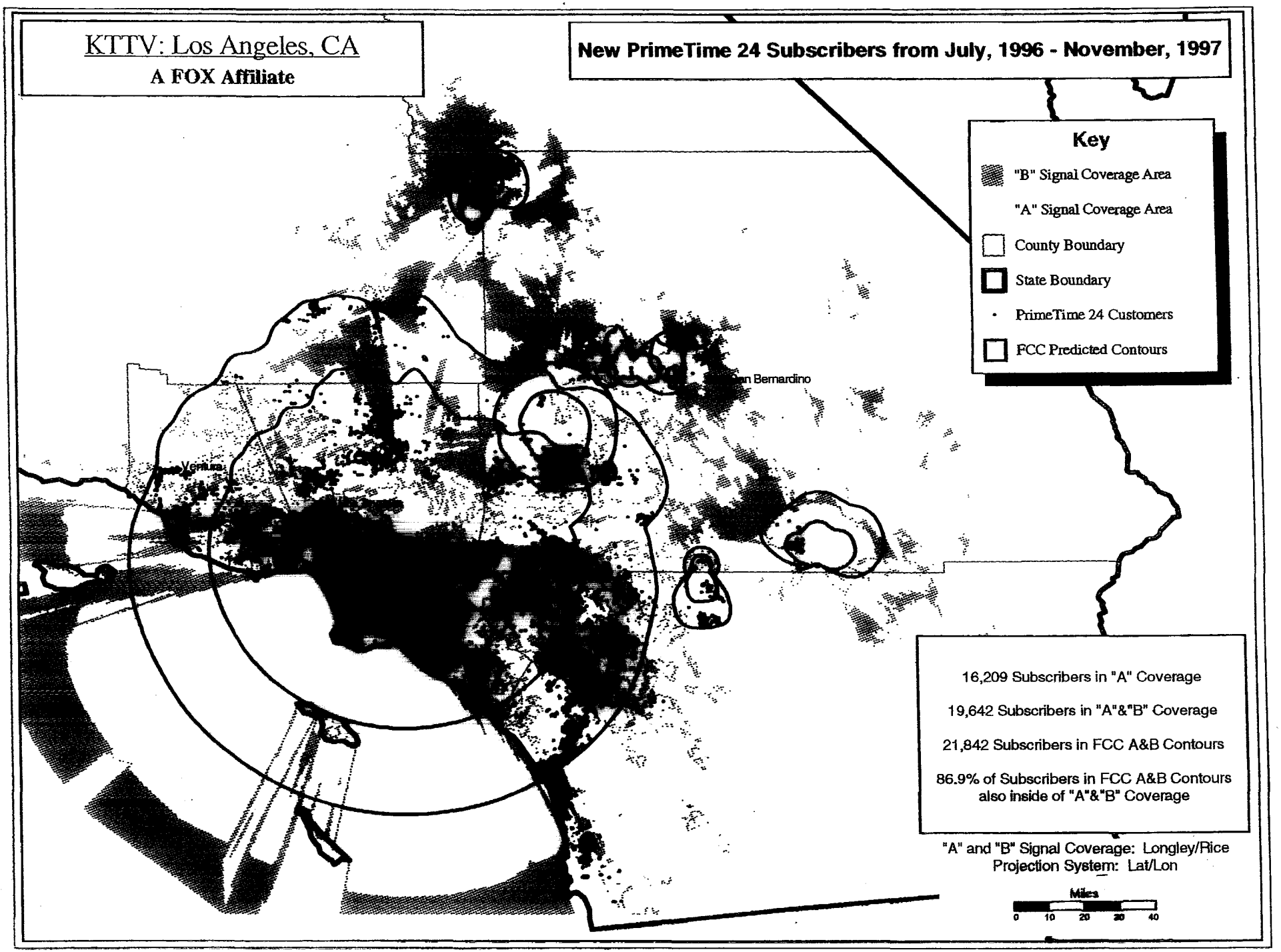
3. KJEO, Channel 47, Fresno, CA (CBS)

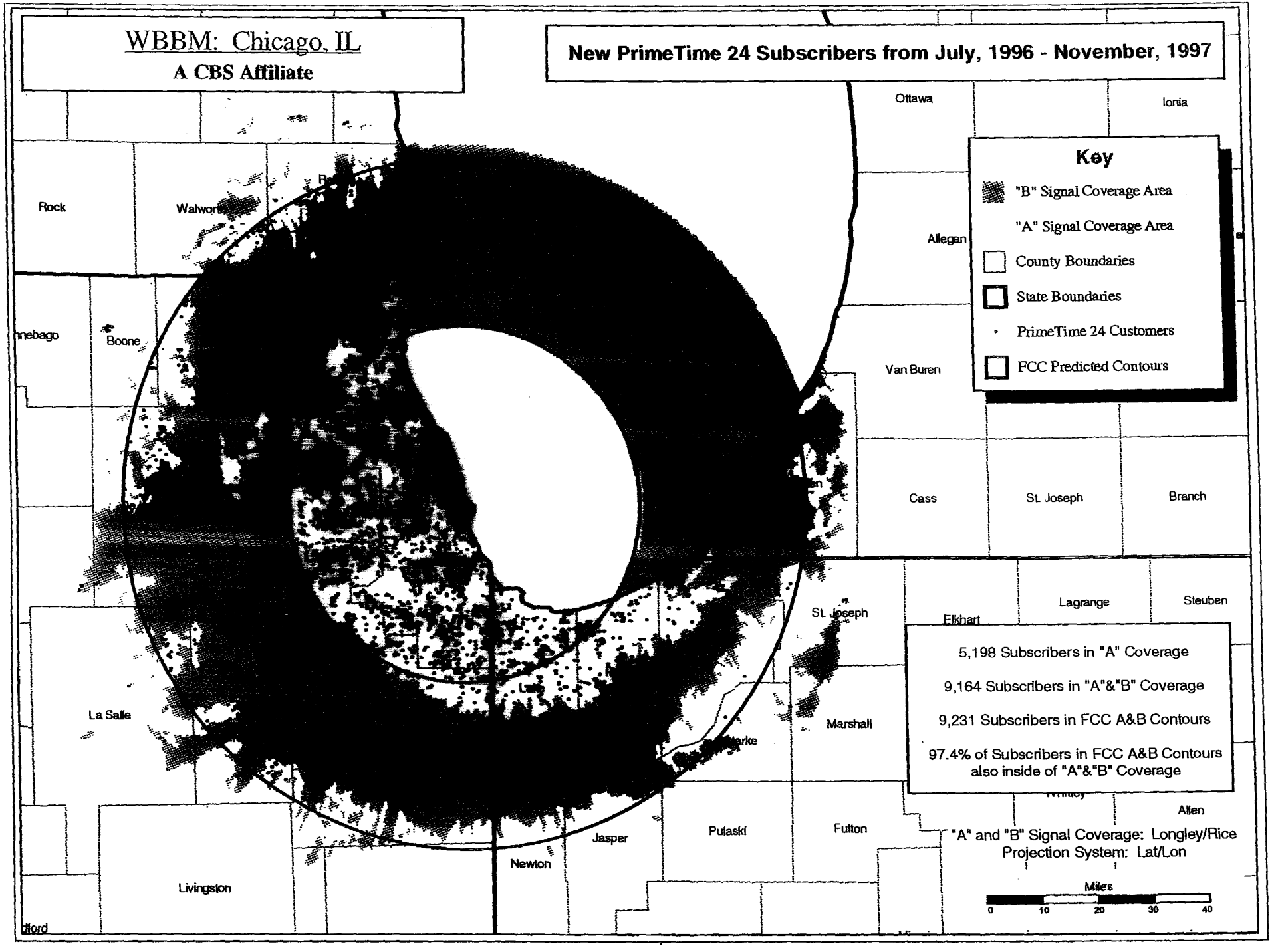
4. KPAX, Channel 8, Missoula, MT (CBS)

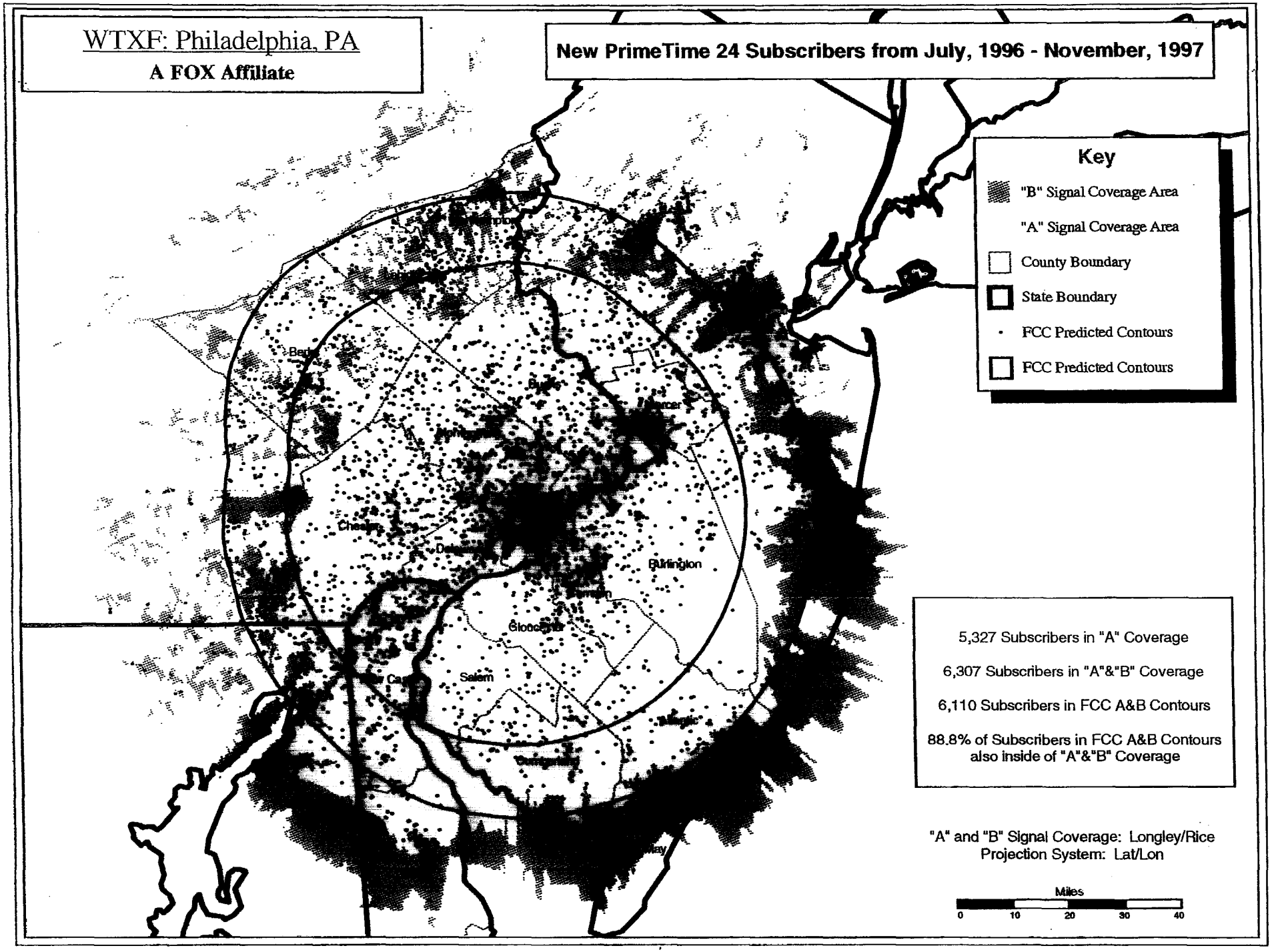
5. WISH, Channel 8, Indianapolis, IN (CBS)

B


WCBS: New York, NY
A CBS Affiliate
New PrimeTime 24 Subscribers from July, 1996 - November, 1997
Ulster
Sullivan
Dutchess
Orange
Pike
Warren
Suffolk
Key
"B" Signal Coverage Area
"A" Signal Coverage Area
County Boundary
State Boundary
PrimeTime 24 Customers
FCC Predicted Contours
8,661 Subscribers in "A" Coverage
12,413 Subscribers in "A"&"B" Coverage
13,004 Subscribers in FCC A&B Contours
94.6% of Subscribers in FCC A&B Contours also inside of "A"&"B" Coverage
"A" and "B" Signal Coverage: Longley/Rice
Projection System: Lat/Lon
Miles
0
10
20
30
40


KTTV: Los Angeles, CA
A FOX Affiliate
New PrimeTime 24 Subscribers from July, 1996 - November, 1997
Key
"B" Signal Coverage Area
"A" Signal Coverage Area
County Boundary
State Boundary
PrimeTime 24 Customers
FCC Predicted Contours
16,209 Subscribers in "A" Coverage
19,642 Subscribers in "A"&"B" Coverage
21,842 Subscribers in FCC A&B Contours
86.9% of Subscribers in FCC A&B Contours also inside of "A"&"B" Coverage
"A" and "B" Signal Coverage: Longley/Rice
Projection System: Lat/Lon
Miles
0 10 20 30 40


WBBM: Chicago, IL
A CBS Affiliate
New PrimeTime 24 Subscribers from July, 1996 - November, 1997
Key
"B" Signal Coverage Area
"A" Signal Coverage Area
County Boundaries
State Boundaries
PrimeTime 24 Customers
FCC Predicted Contours
5,198 Subscribers in "A" Coverage
9,164 Subscribers in "A"&"B" Coverage
9,231 Subscribers in FCC A&B Contours
97.4% of Subscribers in FCC A&B Contours also inside of "A"&"B" Coverage
"A" and "B" Signal Coverage: Longley/Rice
Projection System: Lat/Lon
Miles
0
10
20
30
40
Ottawa
Ionia
Rock
Allegan
Boone
Van Buren
Cass
St. Joseph
Branch
Elkhart
Lagrange
Steuben
La Salle
Marshall
Allen
Jasper
Pulaski
Fulton
Newton
Livingston


WTXF: Philadelphia, PA
A FOX Affiliate
New PrimeTime 24 Subscribers from July, 1996 - November, 1997
Key
"B" Signal Coverage Area
"A" Signal Coverage Area
County Boundary
State Boundary
FCC Predicted Contours
FCC Predicted Contours
Burlington
Salem
5,327 Subscribers in "A" Coverage
6,307 Subscribers in "A"&"B" Coverage
6,110 Subscribers in FCC A&B Contours
88.8% of Subscribers in FCC A&B Contours also inside of "A"&"B" Coverage
"A" and "B" Signal Coverage: Longley/Rice
Projection System: Lat/Lon
Miles
0
10
20
30
40