

carriage of [advanced television] signals," the Commission does have authority to establish carriage procedures when a cable system's one-third capacity has been exhausted.

During the DTV transition period, in instances where the mandatory carriage capacity is exhausted, the "primary video" requirement should be understood to prohibit cable operators from deleting both the analog and digital signals of a local station. Each local station would be permitted carriage of either its analog or digital signal but a cable operator would not be permitted to deny carriage of both signals of one station in lieu of another local broadcaster gaining carriage of both or multi-channel signals. In other words, when a cable system's capacity is exhausted, each local station should be assured of having at least one of its two signals carried on the cable system. Broadcasters should retain the discretion to select either their analog or digital primary signal on the local cable system.

This approach is within the Commission's authority and consistent with congressional goals. By ensuring mandatory carriage of at least one signal (preferably the DTV) of each station, the widespread dissemination of information would be preserved. Congress surely did not intend that the implementation of digital television would hand cable operators the opportunity to reduce the multiplicity of voices that the mandatory carriage provisions are intended to protect. The "primary video" provision would be understood to prevent one station from being denied carriage of both its primary signals so that another station could gain carriage of both primary signals.

Once the broadcaster has selected which signals (analog or DTV) it wants the cable operator to carry then must carry of multi-channel should be at the discretion of the cable operator. Such an approach is grounded in the important interests Congress advanced in enacting must carry. The discriminatory power held by cable operators — in tandem with the incentive to use it — indicates that upon the successful implementation of digital television, cable operators, aware that viewers inevitably would be drawn to the higher-quality format, would have the opportunity to saddle local stations with an inferior analog format. Congress addressed this concern by adopting must carry's material degradation provision.<sup>51/</sup> Granting cable operators the power to select a local station's carriage format in these circumstances would reduce the multiplicity of media voices. This type of discrimination runs afoul of the must carry interests and is thus outside the legitimate discretion granted to cable operators. Instead, local broadcasters should be permitted to select the format of the must carry signal when stations may have only one of its two signals carried on a cable system. Cable operators would retain the discretion of selecting which local stations would have carriage of multi-channel signals — but without resulting in any reduction in the multiplicity of media voices and in full compliance with the existing must carry law.

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<sup>51/</sup> 47 U.S.C. § 534(b)(4)(A).

### **III. CABLE SYSTEMS MAY NOT DELAY CARRIAGE OF LOCAL BROADCASTERS' DIGITAL SIGNALS.**

The principal distinguishing factor among the Commission's several mandatory carriage proposals is the timing of the commencement of DTV must carry. Paxson believes the public interest would be best served if the Commission adopted the "Immediate Carriage Proposal," with mandatory carriage triggered when the first digital television station in the given market commences broadcasting. This approach is most consistent with Congress' intentions and is supported by sound public policy. The shared purpose of the must carry provisions and the transition to DTV is, as the Commission suggests, "the continued availability of free over-the-air television broadcast service."<sup>52/</sup> No other proposal advances this purpose more than immediate DTV mandatory carriage.

The rapid roll-out of over-the-air DTV multi-channel broadcasting quickly introduces the benefits of a new service to the public and allows for the prompt recovery of valuable spectrum. On the other hand, the cost of this rapid roll-out is that the public is hesitant to embrace a technology it perceives as less than mature in light of publicized transition problems that are inherent in any massive implementation of new technology. However, the digital transition is inevitable. The policies and goals that led the Commission to adopt a rapid roll-out of DTV are unchanged. The public interest would be best served if the Commission demonstrates confidence in the DTV transition and requires cable systems to carry immediately the DTV multi-

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<sup>52/</sup> Notice at ¶43.

channel signals of local broadcasters. If the Commission chooses to delay DTV must carry, it is very likely that viewers who receive service via cable will delay purchasing DTV receivers, necessarily extending the DTV transition period.<sup>53/</sup> Furthermore, given persistent reports of the difficulties of receiving over-the-air DTV signals,<sup>54/</sup> the Commission risks creating an intractable "chicken-and-egg" problem unless DTV must carry is required immediately and consumers are assured of viable DTV reception.<sup>55/</sup> Transition problems such as those with DTV over-the-air reception are inevitable but will be resolved in due course. Unfortunately, because of the rapid roll-out requirements, broadcasters are not permitted the luxury of waiting until transition problems are resolved before commencing digital transmissions. At this point, the most practical approach is to require immediate DTV must carry to facilitate the smooth and rapid implementation of digital television and promote general innovation while minimizing the possibility of consumers balking at the new technology.

In any event, if the Commission determines to adopt a proposal other than immediate carriage, it should not grant cable operators the power to undermine DTV policies through delay of DTV mandatory carriage or discriminatory treatment that disadvantages local broadcasters. The Commission should adopt the proposal that

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<sup>53/</sup> Congress established that broadcasters will return their analog channel when DTV market penetration has reached specified levels. 47 U.S.C. § 309(j)(14).

<sup>54/</sup> See, e.g., *DTV Reception 80% Successful Outdoor, 60% Indoor, in Washington Tests*, Comm. Daily, April 20, 1998, at 2.

<sup>55/</sup> Joel Brinkley, *The Two Sides of HDTV: Which Will Go First?*, N.Y. Times, Aug. 29, 1997; Kyle Pope, *Promise of Digital TV Fades, as Broadcasters Complain*, Wall St. J., Sept. 12, 1997.

implements DTV in the swiftest fashion possible without opportunity for cable operators to reduce the multiplicity of media voices or multi-channel voices.

**IV. TELEVISION STATIONS ARE ENTITLED TO THE 6 MHZ OF MUST CARRY SPECTRUM GRANTED BY CONGRESS.**

Each broadcaster should have its entire 6 MHz of DTV signal carried by the cable operator except for those parts of the signal dedicated to ancillary or supplementary services. In the 1992 Cable Act, Congress granted each local commercial television station mandatory carriage rights corresponding to each broadcaster's allotted 6 MHz of spectrum. Congress did not distinguish between analog and digital transmissions, nor between the amount of bandwidth necessary for each signal. Instead, each broadcaster was allotted the same amount of spectrum for DTV as already was authorized for analog purposes (*i.e.*, 6 MHz).

While Congress plainly was aware of the expanded capabilities DTV presented, it chose simply and explicitly to exclude just the ancillary and supplementary services from the mandatory carriage provisions.<sup>56/</sup> The Act provides that the Commission shall allow DTV licensees "to offer . . . ancillary or supplementary services,"<sup>57/</sup> and that the Commission will establish a fee program if broadcasters charge subscription fees for such services.<sup>58/</sup> If subscription fees or non-advertisement compensation are required by a licensee for customers to receive

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<sup>56/</sup> 47 U.S.C. § 336(b)(3).

<sup>57/</sup> *Id.*, § 336(a)(2).

<sup>58/</sup> *Fifth DTV Report and Order*, 12 FCC Rcd at 12823.

a digital service from the local broadcaster, then such services are necessarily ancillary or supplementary and do not warrant mandatory carriage.

However, all free, non-supplementary, over-the-air signals carried within broadcasters' 6 MHz band should be granted mandatory carriage. This would permit any free, over-the-air digital multi-channel broadcasting by the local station to be delivered by the cable system, consistent with Congress' statements in the legislative history:

Within each 6 megahertz (MHz) assignment, a variety of digitally transmitted services can be offered by a broadcast licensee. The characteristics of a digital transmission permit it to be used for an intermixed flow of data. Given the dynamic nature of the data flow, these services probably cannot be separated or segmented. Therefore, these different digital services are "*indivisible*" within the 6 MHz assignment, and these services are provided along with the signal that the licensee broadcasts advanced television (ATV) programming.<sup>59/</sup>

As Congress recognized, the indivisible nature of DTV signals does not lend itself easily to partitioning and exclusion. Thus, the Commission should limit the definition of ancillary and supplementary services to those where customers are paying subscription fees or non-advertising third parties are providing compensation, thereby permitting the mandatory carriage of free, over-the-air, local multicasting. This indivisible nature of DTV signals also indicates that Congress did not expect that the "primary video" provision<sup>60/</sup> would serve as an impediment to the mandatory carriage of digital multicasting, but that the entire portion of the digital signal dedicated to

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<sup>59/</sup> H.R. REP. NO. 104-204, at 83-84 (1996) (emphasis added).

<sup>60/</sup> 47 U.S.C. § 534(b)(3)(A).

supporting the video transmission (including that for the accompanying audio, interactive features, and the like) would be primary unless excluded by other provisions in Section 614 of the Act. By prohibiting cable operators from chiseling the 6 MHz allotted to broadcasters, the Commission would remain faithful to Congress' language, promote innovation, and ensure the maximum benefit of free, over-the-air television to the public including multi-channel programming, thus aiding the DTV transition.

Furthermore, the indivisible nature of the 6 MHz DTV signal supports the view that determining a cable operator's "usable activated channels" for capacity purposes<sup>61/</sup> should simply be calculated in terms of 6 MHz blocks and not in terms of programming services or throughput. This interpretation is consistent with the plain meaning of the term. There is no indication that Congress ever considered an alternative or flexible definition of "usable activated channels."<sup>62/</sup> To facilitate the successful implementation of DTV and to ensure a smooth transition for viewers, the Commission should adopt a definition of "usable activated channels" based upon the indivisible 6 MHz block of spectrum allotted to broadcasters. This is in keeping with the technical latitude Congress recognized in calling for the FCC digital must carry review.

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<sup>61/</sup> 47 U.S.C. § 534(b)(1)(B).

<sup>62/</sup> The definition of "usable activated channels" allows the Commission to adopt technical regulations that would define the scope of "usable." 47 U.S.C. §522(19).

**V. COMMENTS ON SPECIFIC IMPLEMENTATION ISSUES.**

Below, Paxson responds to a number of specific implementation matters on which the Commission sought comment.

**A. Digital and Analog Signals Are Not Substantially Duplicative.**

Section 614(b)(5) of the Act provides that mandatory carriage of substantially duplicative signals is not required.<sup>63/</sup> In light of Congress' directive to the Commission that it "ensure [DTV] cable carriage," it would not be reasonable to conclude that Section 614(b)(5) prohibits mandatory carriage of both a station's analog and digital signals. Rather, Congress clearly was concerned with relieving cable operators from the obligation of carrying duplicate signals from two different stations and not two signals from the same station. Of course, the digital and analog signals will be duplicative to some extent — there is a DTV simulcasting requirement.<sup>64/</sup>

**B. The Material Degradation Provision Prohibits Cable Operators From Discriminating Against Local Broadcasters' DTV Signals.**

Congress prohibited cable operators from materially degrading the signals of local broadcasters and directed the Commission to ensure that the quality of broadcasters' signal carriage was no less than that provided by any other signal on the system, to the extent technically possible.<sup>65/</sup> Congress makes clear that cable operators cannot disadvantage local commercial broadcast stations, and the implementation of DTV does not transform that principle. Accordingly, if a cable

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<sup>63/</sup> 47 U.S.C. § 534(b)(5).

<sup>64/</sup> 47 C.F.R. § 73.624(f).

<sup>65/</sup> 47 U.S.C. § 534(b)(4)(A).

operator carried a cable programming service in the 1080i HDTV format, then it must carry, without material degradation, all commercial television stations which provide 1080i HDTV signals.

Permitting cable operators to degrade a broadcaster's DTV signal to a level of quality commensurate with its NTSC signal would result in a signal duplication that would vitiate the station's digital mandatory carriage rights — an outcome Congress certainly did not intend. The reasonable construction indicates that cable systems must not materially degrade local broadcasters' DTV signals or act to discriminate against broadcasters through technical means.

**C. Open Video Systems Should be Subject to the Same Mandatory Carriage Requirements Imposed on Cable Systems.**

Section 653(c) of the Act provides that, to the extent possible, any provision that applies to cable operators under Section 614 also applies to open video system operators.<sup>66/</sup> The Commission recognizes that there are no public policy reasons to justify treating OVS operators differently from cable operators.<sup>67/</sup> Consistent with the plain language and intent of Congress, the implementation of digital television does not change the obligation of OVS operators to provide mandatory carriage of local broadcasters or their multi-channel DTV programming services.

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<sup>66/</sup> *Id.*, § 573(c).

<sup>67/</sup> *Notice at ¶154; Implementation of Section 302 of the Telecommunications Act of 1996, Second Report and Order*, 11 FCC Rcd 18223, 18307-08 (1996).

**D. The Existing Tier and Channel Position Rules Should Be Followed.**

A cable system must place the digital transmissions of local television stations on the same basic tier where analog channels are located. This will ensure that consumers have a smooth transition to digital television, and, in light of the on-going revolution in navigational devices, would prevent cable systems from disadvantaging local broadcasters. The Commission should specifically revisit this issue in its DTV biennial reviews to adjust this policy if technological changes dictate.

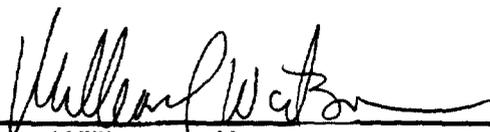
Likewise, the Act's channel position requirements also should remain in effect with television stations having the option of electing the channel on which the digital signal is carried. This will permit local stations to maintain important brand identity in the face of the inevitable viewer confusion associated with DTV's dual channel approach. This issue, too, should be revisited in the biennial reviews.

**CONCLUSION**

The Commission's actions in this proceeding will have important long-term consequences on the viability of local broadcast stations, the survivability of UHF television stations and the competitiveness of new television networks such as **PAXTV**. The statutory road map for digital must carry is clear and unambiguous and the Commission should move quickly to push aside any roadblocks to quick and decisive implementation of digital multi-channel must carry.

Respectfully submitted,

**PAXSON COMMUNICATIONS CORPORATION**

By:   
Name: William L. Watson  
Title: Vice President and  
Assistant Secretary

**PAXSON COMMUNICATIONS CORPORATION**  
601 Clearwater Park Road  
West Palm Beach, FL 33401  
561/659-4122

October 13, 1998

## STATEMENT OF LOWELL W. PAXSON

Lowell W. Paxson hereby submits this declaration, pursuant to Section 1.16 of the Commission's rules, 47 C.F.R. § 1.16, in support of the Comments submitted by Paxson Communications Corporation in CS Docket No. 98-120.

1. I am Chairman of Paxson Communications Corporation ("Paxson"), which owns the largest broadcast television station group in the United States. These Paxson television stations, along with a number of non-owned affiliate stations, comprise **PAXTV** — the nation's newest over-the-air broadcasting network. Nearly all of those stations are UHF stations (a list of stations is attached as Exhibit A). **PAXTV** is dedicated to the broadcast and production of quality family programming.

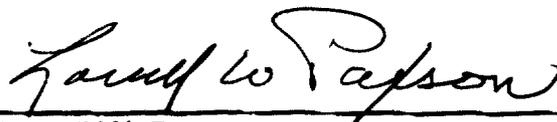
2. I was a principal in Silver King Communications, Inc., a developing UHF station group, when Congress was deliberating the 1992 Cable Act. I worked hard for passage of the mandatory carriage provisions contained in the 1992 Cable Act. The vitality and success of the Silver King UHF stations, now a part of the USA Network station group, was in large part due to the 1992 Cable Act's carriage requirements. Digital must carry is no less important today to the continued existence and growth of UHF stations and the programming choices they provide to the American people. Without digital must carry, many UHF stations, which typically have coverage areas that are more limited than their VHF counterparts, will face a serious competitive disadvantage. I believed in 1992 and do now that must carry is absolutely vital to the success of UHF television stations. Further digital must carry of multi-channel programs from DTV UHF broadcasters is absolutely vital to the DTV roll out and the competitive viability of multi-channel cable programmers.

3. **PAXTV** is an important alternative media voice in numerous markets throughout the country. Under existing law, the analog signal of Paxson's owned and affiliated stations is assured carriage on cable television systems. The economic viability of **PAXTV** absolutely depends upon the continuation of these local mandatory carriage rights as the Paxson stations migrate from analog to digital operation. Without must carry, Paxson would not have been able to build 28 television stations and to develop its group of television stations or its new television network and thereby increase the multiplicity of voices as Congress intended. The transition to digital television will significantly affect each local broadcast station, especially the smaller UHF stations like those that comprise the **PAXTV** network. Without DTV must carry for multi-channels of programming, the survival of many UHF stations will be placed at risk and the ability of **PAXTV** to continue its development as a meaningful competitor to the larger, established television networks, multi-channel cable owners and to provide a real alternative of quality family programming will be jeopardized.

4. On August 31, 1998, Paxson launched the **PAXTV** Network distributing the **PAXTV** programming nationwide via the Paxson-owned and affiliated television stations. In order to launch this new network, Paxson has spent upwards of \$1.5 billion to create its distribution system and \$.5 billion to purchase its programming. Paxson has built or rebuilt over 40 UHF television stations in the last 24 months and has committed to building and rebuilding an additional 15-20 UHF stations. This investment in stations and programming is absolutely essential if **PAXTV** is to garner the audience that it will require to be a commercial advertising success. The success of **PAXTV** will add to the diversity of programming available to the American public.

5. The conversion to digital will be equally expensive for the Paxson group of television stations and for the PAXTV network. It is essential that Paxson's multi-channel digital signals be carried by cable in order to justify this immense expense. Without the assurance that the digital signals will be received by the ever-increasing number of cable homes in this country, it is unlikely that Paxson, or any other large group owner, can hope to undertake the type of digital conversion that is being required by the FCC. Guaranteed carriage of broadcast stations' digital signals will, however, provide the necessary assurance to Paxson that its digital signal will reach the cable audiences that now comprise a majority of the TV households in this country. Digital must carry will be a key ingredient in PAXTV's efforts to expand programming diversity in this country and to develop additional family friendly programming networks.

I state under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on October 12, 1998.



Lowell W. Paxson  
Chairman, Paxson Communications Corporation  
601 Clearwater Park Road  
W. Palm Beach, Florida 33401

**EXHIBIT A**  
**(List of Owned & Non-Owned Stations)**

<b><u>CALL SIGN</u></b>	<b><u>CHANNEL</u></b>	<b><u>CITY, STATE</u></b>	<b><u>DMA (# OUT OF 211)</u></b>
<b><u>PCC Owned Stations (51)</u></b>			
WPXN(TV)	31	New York, NY	New York, NY (1)
WBPT(TV)	43	Bridgeport, CT	New York, NY (1)
KPXN(TV)	30	San Bernardino, CA	Los Angeles, CA (2)
WCPX(TV)	38	Chicago, IL	Chicago, IL (3)
WPPX(TV)	61	Wilmington, DE	Philadelphia, PA (4)
KKPX(TV)	65	San Jose, CA	San Francisco-Oakland- San Jose, CA (5)
WPXB(TV)	60	Merrimack, NH	Boston, MA (6)
WPXW(TV)	66	Manassas, VA	Washington, DC (7)
KPXD(TV)	68	Arlington, TX	Dallas-Ft. Worth, TX (8)
WPXD(TV)	31	Ann Arbor, MI	Detroit, MI (9)
WPXA(TV)	14	Rome, GA	Atlanta, GA (10)
KPXB(TV)	49	Conroe, TX	Houston, TX (11)
KWPX(TV)	33	Bellevue, WA	Seattle-Tacoma, WA (12)
WVPX(TV)	23	Akron, OH	Cleveland, OH (13)
KPXM(TV)	41	St. Cloud, MN	Minneapolis-St. Paul, MN (14)
WXPX(TV)	66	Bradenton, FL	Tampa-St. Petersburg, FL (15)
WPXM(TV)	35	Miami, FL	Miami-Ft. Lauderdale, FL (16)
KBPX(TV)	13	Flagstaff, AZ	Phoenix, AZ (17)
KPXC-TV	59	Denver, CO	Denver, CO (18)
WOPX(TV)	56	Melbourne, FL	Orlando-Daytona Beach- Melbourne, FL (22)
KPXG(TV)	22	Salem, OR	Portland, OR (24)
WFPX(TV)	62	Fayetteville, NC	Raleigh-Durham, NC (29)
KPXE(TV)	50	Kansas City, MO	Kansas City, MO (31)
WNPX(TV)	28	Cookeville, TN	Nashville, TN (33)
KUWB(TV)	30	Ogden, UT	Salt Lake City, UT (36)
WPXV(TV)	49	Norfolk, VA	Norfolk-Portsmouth- Newport News, VA (39)
WAQF(TV)	51	Batavia, NY	Buffalo, NY (40)
WPXP(TV)	67	Lake Worth, FL	West Palm Beach-Ft. Pierce (43)
KOPX(TV)	62	Oklahoma City, OK	Oklahoma City, OK (44)
WGPX(TV)	16	Burlington, NC	Greensboro-High Point-Winston Salem, NC (46)
WQPX(TV)	64	Scranton, PA	Wilkes Barre-Scranton, PA (47)
WPXQ(TV)	69	Block Island, RI	Providence , RI-New Bedford, MA (49)
WPXH(TV)	44	Gadsden, AL	Birmingham, AL (51)
WYPX(TV)	55	Amsterdam, NY	Albany-Schenectady-Troy, NY (52)
WDPX(TV)	26	Springfield, OH	Dayton, OH (53)

<b><u>CALL SIGN</u></b>	<b><u>CHANNEL</u></b>	<b><u>CITY, STATE</u></b>	<b><u>DMA (# OUT OF 211)</u></b>
KPXF(TV)	61	Porterville, CA	Fresno-Visalia, CA (55)
KYPX(TV)	42	Little Rock, AR	Little Rock-Pine Bluff, AR (56)
KTPX(TV)	44	Okmulgee, OK	Tulsa, OK (58)
WPXR(TV)	38	Roanoke, VA	Roanoke-Lynchburg, VA (68)
KFPX(TV)	39	Newton, IA	Des Moines-Ames, IA (69)
WPXG(TV)	14	Suring, WI	Green Bay-Appleton, WI (70)
KPXO(TV)	66	Kaneohe, HI	Honolulu, HI (71)
KGPX(TV)	34	Spokane, WA	Spokane, WA (73)
WPXO(TV)	21	Minden, LA	Shreveport, LA (76)
WMPX(TV)	23	Waterville, ME	Portland-Auburn, ME (80)
WPXU(TV)	23	Decatur, IL	Champaign & Springfield- Decatur, IL (81)
KPXR(TV)	48	Cedar Rapids, IA	Cedar Rapids-Waterloo & Dubuque, IA (87)
KPXK(TV)	30	Odessa, TX	Odessa-Midland, TX (150)
WJPX(TV)	24	San Juan, PR	Not covered by a DMA
WKPV(TV)	20	Ponce, PR	Not covered by a DMA
WJWN(TV)	38	San Sebastian, PR	Not covered by a DMA

**PENDING APPLICATIONS (4)**

WPCB(TV)	40	Greensburg, PA	Pittsburgh, PA (19)
KUPX(TV)	16	Provo, UT	Salt Lake City, UT (36)
WKRP-TV	29	Charleston, WV	Charleston-Huntington, WV (57)
WPXK(TV)	54	Jellico, TN	Knoxville, TN (64)

**MINORITY INTERESTS IN STATIONS UNDER CONSTRUCTION (3)**

KPPX(TV)	51	Tolleson, AZ	Phoenix, AZ (17)
KPXL(TV)	26	Uvalde, TX	San Antonio, TX (38)
WSPX(TV)	56	Syracuse, NY	Syracuse, NY (72)

**PENDING SETTLEMENTS(5)**

Channel 14	14	Albuquerque, NM	Albuquerque-Santa Fe, NM (48)
Channel 61	61	Mobile, AL	Mobile, AL-Pensacola, FL (62)
Channel 67	67	Galesburg, IL	Davenport, IA-Rock Island- Moline, IL (89)
Channel 51	51	Jackson, MS	Jackson, MS (90)
Channel 15	15	Christiansted, VI	Not covered by a DMA

**INDEPENDENTLY-OWNED AFFILIATES (25)\***

WBPX(TV)	46	Norwell, MA	Boston, MA (6)
WWPX(TV)	60	Martinsburg, WV	Washington, DC (7)
KSPX(TV)	29	Sacramento, CA	Sacramento, CA (20)
WPXS(TV)	13	Mt. Vernon, IL	St. Louis, IL (21)
WHPX(TV)	26	New London, CT	Hartford & New Haven, CT (27)
WRPX(TV)	47	Rocky Mount, NC	Raleigh-Durham, NC (29)
WPXE(TV)	55	Kenosha, WI	Milwaukee, WI (32)
KCSG(TV)	04	Cedar City, UT	Salt Lake City, UT (36)
WZPX(TV)	43	Battle Creek, MI	Grand Rapids-Kalamazoo- Battle Creek, MI (37)
WPXL(TV)	40	New Orleans, LA	New Orleans, LA (41)
WPXX(TV)	50	Memphis, TN	Memphis, TN (42)
WLMB(TV)	40	Toledo, OH	Toledo, OH (66)
WTSN-LP	63	Evansville, IN	Evansville, IN (95)
KTSB-LP	43	Santa Barbara, CA	Santa Barbara, CA (115)
KROZ(TV)	36	Roseburg, OR	Eugene, OR (120)
WBGR-LP	33	Bangor, ME	Bangor, ME (155)
KDMD(TV)	33	Anchorage, AK	Anchorage, AK (156)
KVCC-LP	58	Palm Springs, CA	Palm Springs, CA (159)
KKRA-LP	24	Rapid City, SD	Rapid City, SD (172)
WJRD-LP	49	Tuscaloosa, AL	Tuscaloosa, AL (187)
KUBD(TV)	04	Ketchikan, AK	N/A
KSVX-LP	18	Hailey, ID	Twin Falls, ID (190)
WADA-LP	58	Charlottesville, VA	Charlottesville, VA (194)
WTLW	44	Lima, OH	Lima, OH (203)
KDMD-LP	41	Fairbanks, AK	Fairbanks, AK (205)

\* Negotiations are underway with other potential affiliates.