

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In re Petition of)
)
Comcast Cable Communications, LLC,) CSR-8883-A
on behalf of its subsidiaries and affiliates) Docket No. 14-102
)
For Modification of the Television Market of)
Station WFXU, Channel 48, Live Oak, Florida)

TO: Office of the Secretary
Attn.: Chief, Video Division

OPPOSITION

Budd Broadcasting Co., Inc. (“Budd”), by its attorneys, submits its opposition to the July 8, 2014 Petition for Special Relief submitted by Comcast Cable Communications, LLC (“Comcast”).¹ In support, Budd submits the following:

Comcast in its Petition seeks the exclusion of certain communities served by Comcast from the television market of WFXU.² These communities are located in the Tallahassee-Thomasville DMA. Specifically, Comcast seeks exclusion of Gadsden

¹ Budd acknowledges that the instant submission is filed out of time. However, it is submitted that good cause is present for its consideration since it will allow the Commission to have all of the facts. Budd was delayed in its submission of the instant response until the Commission granted the license application of WUFX-LD (See BLDDT-20141016ACL) (Facility ID No. 187680).

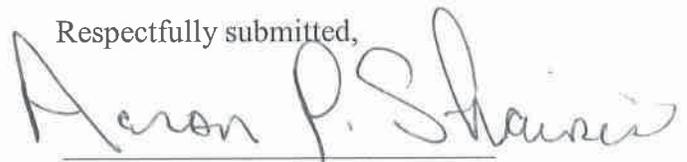
² Budd is the licensee of WFXU.

County, Jefferson County, Midway, Monticello, Quincy, Sopchoppy, Tallahassee and Wakulla County.

Comcast's principal argument in support of its Petition is that Budd fails to deliver a signal to either of the two principal headends serving the Cable Communities. The attached engineering statement dispels this argument. As demonstrated in the engineering statement, Budd is the licensee of WFXU-FT and WUFX-LD which serve the Tallahassee-Thomasville DMA. WUFX-LD is a low power digital television station which receives and rebroadcasts content from WFXU-DT. The two stations have a combined signal coverage area which cover a significant portion of the Tallahassee-Thomasville DMA. In this regard, the engineering statement provides that the combined Longley-Rice coverage areas for WFXU-DT and WUFX-LD have a strong presence in the Tallahassee-Thomasville DMA and will provide the required signal strength needed for the Monticello and Timberlane cable headends.

In view of the foregoing, it is respectfully submitted that the Petition for Special Relief be denied.

Respectfully submitted,



Aaron P. Shainis
Counsel for
Budd Broadcasting Co., Inc.

Dated: January 6, 2015

KESSLER AND GEHMAN ASSOCIATES, INC.

507 NW 60th St. Ste C, Gainesville, FL 32607

WFXU-DT and WUFX-LD Cable Carriage

ENGINEERING STATEMENT OF RYAN WILHOUR OF THE FIRM OF
KESSLER AND GEHMAN ASSOCIATES, INC., CONSULTING ENGINEERS IN
SUPPORT OF AN EXHIBIT DEMONSTRATING SIGNAL COVERAGE OF THE BUDD
BROADCASTING CO., INC. STATIONS IN THE TALLAHASSEE – THOMASVILLE
DMA

Budd Broadcasting Co., Inc. is the licensee of WFXU-DT and WUFX-LD which serve the Tallahassee – Thomasville DMA. WUFX-LD is a low power digital television station which receives and rebroadcasts content from WFXU-DT. The two stations have a combined signal coverage area which cover a significant portion of the Tallahassee – Thomasville DMA.

DISCUSSION

Exhibit E1 demonstrates the 41 dBu¹ F(50,90) FCC noise limited contour and service area based upon a Longley-Rice prediction model for WFXU-DT. Further demonstrated is the 51 dBu² F(50,90) protected contour and service area based upon a Longley-Rice prediction model for WUFX-LD. As illustrated, the WUFX-LD facility covers both the Monticello and Timberlane cable headends with its contour and the Longley-Rice coverage area. The combined Longley-Rice coverage areas for WFXU-DT and WUFX-LD have a strong presence in the Tallahassee – Thomasville DMA and will provide the required signal strength needed for the Monticello and Timberlane cable headends.

¹ Pursuant to 47 C.F.R. § 73.622(e)(1), the noise-limited service contour for WFXU-DT (Channel 48) is 41 dBu.

² Pursuant to 47 C.F.R. § 74.792(a)(3), the protected contour for WUFX-LD (Channel 38) is 51 dBu.

KESSLER AND GEHMAN ASSOCIATES, INC.

507 NW 60th St. Ste C, Gainesville, FL 32607

WFXU-DT and WUFX-LD Cable Carriage

DECLARATION OF ENGINEER

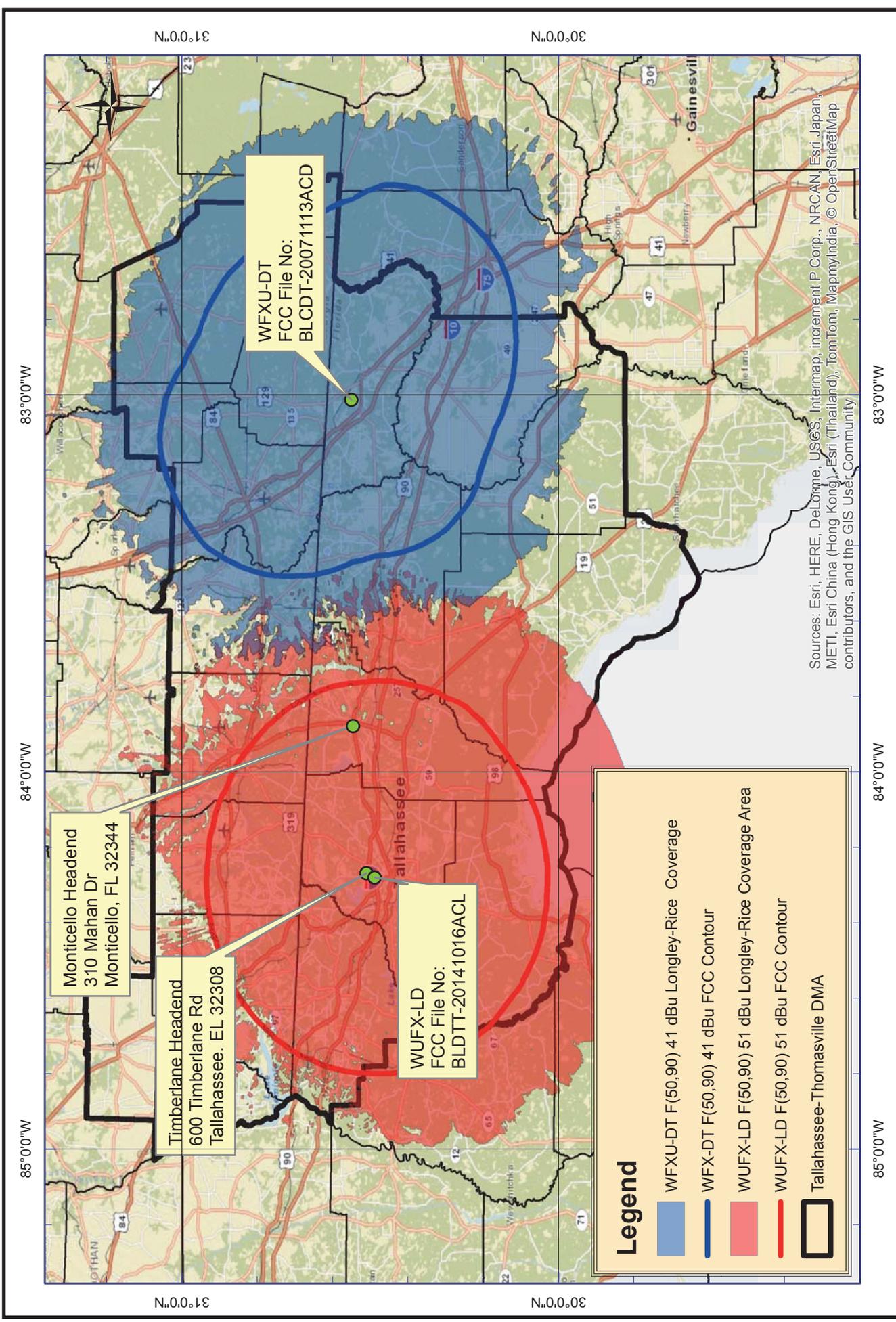
The foregoing statement and the report regarding the aforementioned engineering work are true and correct to the best of my knowledge. Executed December 24, 2014.

KESSLER AND GEHMAN ASSOCIATES, INC.

A handwritten signature in blue ink that reads "Ryan Wilhour". The signature is written in a cursive style with a stylized "W" at the end.

Ryan Wilhour

Consulting Engineer



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WUFX-LD & WFXU-DT
 Tallahassee - Thomasville DMA

12/24/2014

Exhibit E1

CERTIFICATE OF SERVICE

I, Malinda Markland, hereby certify that on this 6th day of January, 2015, true and correct copies of the foregoing OPPOSITION have been served via U.S. Mail, upon the following persons:

Frederick W. Giroux, Esq.*
Davis Wright Tremaine LLP
1919 Pennsylvania Ave NW
Washington, DC 20006

Malinda Markland

Malinda Markland

*Also via e-mail