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KATHLEEN VICTORY
HOWARD M. WEISS

1300 NORTH 17th STREET, 11th FLOOR
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400
FAX: (703) 812-0486
www.fhhlaw.com
www.commlawblog.com

RETIRED MEMBERS
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RICHARD HILDRETH
GEORGE PETRUTSAS
JAMES P. RILEY

OF COUNSEL
THOMAS J. DOUGHERTY, JR.
ROBERT M. GURSS*
KATHRYN A. KLEIMAN
ROBERT J. SCHILL
LAURA A. STEFANI*
ROBERT M. WINTERINGHAM

July 24, 2015

DANIEL A. KIRKPATRICK
(703) 812-0432
KIRKPATRICK@FHHLAW.COM

* NOT ADMITTED IN VIRGINIA

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Letter: AT&T and DirecTV Merger Proceeding, MB Docket No. 14-90*

Dear Ms. Dortch:

On July 22, 2015, Ronald Gordon, Chief Executive Officer of ZGS Communications, Inc. ("ZGS"), Cynthia Martinez, also a management-level official of ZGS, and Daniel Kirkpatrick of the law firm of Fletcher, Heald & Hildreth, PLC, met with Matthew Berry, Chief of Staff of the Office of Commissioner Ajit Pai. During this meeting, ZGS and the Commission parties discussed the attached letters and materials regarding the refusal of DirecTV to carry ZGS' Spanish-language, local programming.

Respectfully submitted,
ZGS COMMUNICATIONS, INC.

By: 
Daniel Kirkpatrick

Fletcher, Heald & Hildreth, PLC
1300 17th Street North, 11th Floor
Arlington, Virginia 22209

Counsel for ZGS Communications, Inc.

Enclosure

cc: Matthew Berry, Chief of Staff, Office of Commissioner Ajit Pai (w/encl.)



2000 N. 14th Street, Suite 400, Arlington, VA 22201
T 703.528.8456 F 703.626.0879
www.zgscommunications.com

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JUN 29 2015

Federal Communications Commission
Bureau / Office

PLEASE STAMP
AND RETURN
THIS COPY TO
FLETCHER, HEALD & HILDRETH

Hon. Thomas Wheeler, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
thomas.wheeler@fcc.gov

Hon. Mignon Clyburn, Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
mignon.clyburn@fcc.gov

Hon. Jessica Rosenworcel, Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
jessica.rosenworcel@fcc.gov

Hon. Ajit Pai, Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
ajit.pai@fcc.gov

Hon. Michael O'Rielly, Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
michael.orielly@fcc.gov

Re: MB Docket No. 14-90. In the Matter of Applications of AT&T, Inc. and DirecTV For Consent to Assign or Transfer Control of Licenses

Dear Chairman Wheeler and Fellow Commissioners:

ZGS Communications, Inc. and its affiliates (collectively "ZGS"), licensees of Class A television stations serving communities across the United States, and the largest independent affiliate of the Telemundo network, respectfully submit this letter in the above-referenced docket. For over twenty five (25) years, ZGS, pursuant to statutory requirement and Commission rule, has been a licensee of the FCC, creating and broadcasting local Spanish-language news and programming tailored to meet the needs and interests of the Latino community. This local content is essential to the lives of an informed and engaged community, as well as our nation's democracy. But, ZGS has been denied carriage on DirecTV satellite systems serving millions of Latino subscribers in major television markets. Thus, our ability to effectively serve our viewers and communities has been greatly hampered, inhibiting our ability to satisfy the core obligation of all broadcast stations—to serve as an interactive community forum for local political, social, and economic dialogue. *See In The Matter of Broadcaster Localism*, 19 FCC Rcd 12425 (Comm. 2004).

DirecTV has systematically denied the Hispanic community access to its local stations, which provide daily news and public safety information, weather reports and emergency notices, as well as extensive programming of local interest to the community. Furthermore, DirecTV has continuously misled potential and existing subscribers by advertising that it carries all local stations, when in fact, it does not. Finally, by not carrying the local Telemundo affiliate, DirecTV provides its Hispanic subscribers a lower level of service – a Standard Definition signal, instead of the HD-quality signal enjoyed by English language viewers.

ZGS is Hispanic-owned and operated, unfortunately one of the very few Latino-owned and operated group broadcasters in the country. The company owns the following Class A stations: WTMO-

CD, Orlando, FL, WKME-CD, Kissimmee, FL, WMVJ-CD, Melbourne, FL, WRMD-CD, Tampa, FL, WWDT-CD, Naples, FL, WZDC-CD, Washington, DC, WZGS-CD, Raleigh, NC, WRDM-CD, Hartford, CT, WRIW-CD, Providence, Rhode Island. ZGS also owns full power and LPTV stations. Over the years, ZGS has invested millions of dollars in producing high quality local Spanish-language news and programming at the stations it operates. Latino viewers who tune to ZGS stations have real time access to news, public safety and emergency information, weather reports, and other programming of local interest, all designed to address the needs and issues that impact the Hispanic community and celebrate the rich traditions and heritage of our community. In almost every market, ZGS creates, produces and airs the most local programming of any Spanish-language station and in many cases produces and airs more local programming than its English-language counterparts. Our commitment to local news is unparalleled, and our quality recognized by the numerous Emmy nominations and awards our news programming has received over the years. Our programming and community engagement have helped us achieve high ratings. We are often the #1 rated Spanish-language station in the market.

Not surprisingly, given our programming, news and significant local engagement, ZGS has secured near-universal carriage of its stations on cable, telephone carriers, and satellite in most of its markets. The one exception, in total disregard of its corporate and civic responsibilities, is DirecTV which continues to dismiss and underserve the Hispanic community in multiple important markets. Our stations in Florida, WTMO-CD in Orlando, FL, WRMD-CD in Tampa, FL, WWDT-CD in Ft. Myers/Naples, as well as in WRDM-CD in Hartford, CT and WZDC-CD in Washington, DC - are leading stations and serve markets with significant Hispanic communities, and yet, despite numerous and on-going attempts, ZGS has experienced extraordinary difficulty in securing DirecTV carriage, which in turn denies a large number of Latino viewers and subscribers access to their local stations.

This proceeding, in which the Commission is being asked to pass on a merger of DirecTV into AT&T Inc. ("AT&T"), offers an opportunity for ZGS to secure FCC - and satellite operator - focus on the local programming/ carriage dilemma. ZGS takes no position of whatever kind on the public interest merits of the merger or whether it should be approved. Rather, ZGS respectfully requests that, in performing its duty to evaluate the complex communications, telecommunications, and antitrust issues raised by the merger proposal, the Commission carefully survey the communications landscape with a view toward promoting full service to minority communities, and diversity of ownership and voices in the industry. AT&T ought to take cognizance of the needs and interests of the local Latino audiences it will serve and the quality programming ZGS offers should the merger be approved. At a minimum, the Commission should strongly urge the powerful AT&T-DirecTV monolith to give serious consideration to fully and effectively serving local communities, and address ZGS' longstanding carriage request.

The Commission should instruct staff familiar with the parties and the issues here to encourage more flexibility on the merged satellite company's part and, if necessary, to take affirmative steps to facilitate further talks between ZGS and DirecTV. The merger may proceed ahead on a timely timeline, if that is what the Commission determines is the proper outcome. But the fundamental programming/carriage issues we raise here should receive a long-delayed and comprehensive review by AT&T and the Commission. Our proposed approach would lead to a "win, win, win" outcome for the satellite companies, ZGS, and most importantly, the viewing public. The public interest and DirecTV's private interest intersect here; - DirecTV can do well by doing right.

DirecTV's rigid position on carriage severely inhibits ZGS' ability to accomplish the objectives of Title III of the Communications Act, as interpreted and enforced by the Commission. In *Localism, supra*, the Commission reiterated that "the concept of localism derives from Title III of the Communications Act." *Localism, supra* at 12426. As the Supreme Court observed in *FCC v. Attentown*

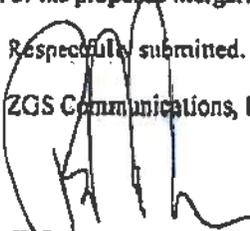
Broadcasting Corporation, 349 U.S. 358, 362 (1955): "Fairness to communities [in distributing radio services] is fostered by a recognition of local needs for a community radio mouthpiece." The Commission has followed Congress' and the Supreme Court's lead:

"As with competition and diversity, localism has been a cornerstone of broadcast regulation for decades. Broadcasters, who are temporary trustees of the public's airwaves, must use the medium to serve the public interest, and the Commission has consistently interpreted this to mean that licensees must air programming that is responsive to the interests and needs of their communities of license. Even as the Commission deregulated many behavioral rules for broadcasters in the 1980s, it did not deviate from the notion that they must serve their local communities." *Localism, supra* at 12425.

We are a very committed and proud Latino broadcaster. We regard our FCC licenses as embodying a responsibility and a duty to effectively serve our communities. We are doing our part by being the very best local broadcaster we can be. It is only fair and right that Latino audiences be offered the same level of commitment and service by DirecTV. This is the least the "public interest" demands of DirecTV and other MVPDs. Therefore, the Commission should broker a mutually-acceptable settlement between DirecTV or DirecTV's successor (AT&T) and ZGS, contemplating retransmission of ZGS' stations in every market prior to federal approval of the proposed merger.

Respectfully submitted,

ZGS Communications, Inc.


By: Ronald Gordon
Chief Executive Officer

June 29, 2015



AT&T and DIRECTV Local Carriage Commitment “The Right Thing to Do”

July 8, 2015

ZGS AT-A-GLANCE

- Strong and successful Spanish-language TV operator for 30 years with a solid reputation for excellence
 - Strong operations, dedicated teams
 - Continuous investment in local content and stations
- Dedicated to localism
 - Quality local news in top markets
 - More local programming than any other Spanish broadcaster
 - Extensive community service – our mission and responsibility
 - Strong civic engagement
- 25-year affiliate partnership with Telemundo
- Only Hispanic-owned TV broadcast group in the U.S.
 - 180+ employees, 94% are female and/or minority
 - Strong commitment to diversity and developing media professionals

SERVING OUR LOCAL COMMUNITIES

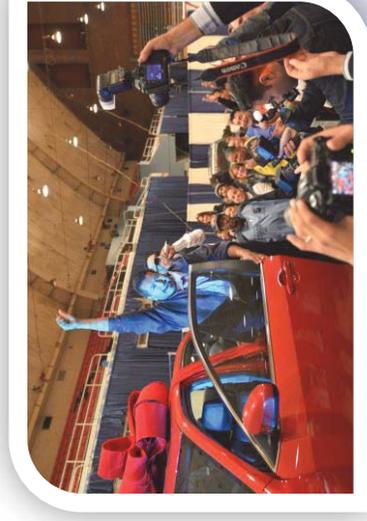
- Local early and late news in Top 20 markets
 - Highest journalistic standards to inform and educate the Hispanic community
 - Public safety and emergency notices
 - Up-to-the-minute weather reports
 - Award-winning local newscasts
- Culturally relevant and community affairs programming
 - Agenda
 - **holaciudad teve!**
 - Línea Directa
 - Telediario
 - Telenoticias Xtra
 - Two Zona
 - ...and much more!



“La Voz de la Comunidad” – The Voice of our Community

SERVING OUR LOCAL COMMUNITIES

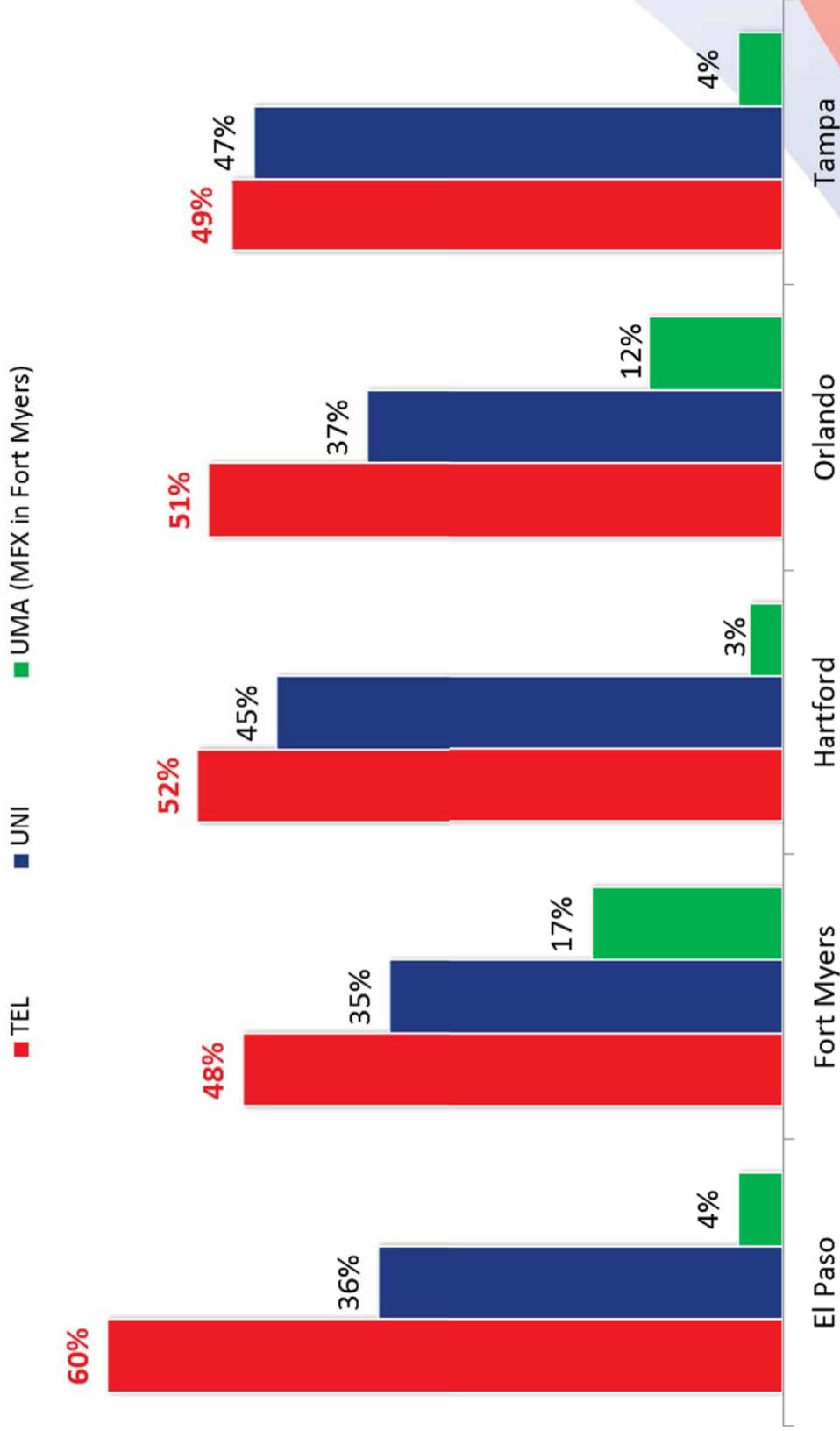
- Civic engagement and public service initiatives
 - *Vota por tu Futuro* – registration and GOTV
 - Affordable Care Act Town Halls
 - Línea de Ayuda – Help Line
 - Buena Vida Health Expo
 - Education
 - Hispanic Heritage Scholarship Award
 - *Educación a su alcance*
- Celebration of Hispanic heritage and culture
 - La Feria de la Familia
 - Fiesta de las Madres
 - Hispanic Heritage Festivals
 - ... and much more!



ZGS STATION GROUP RATINGS HIGHLIGHTS

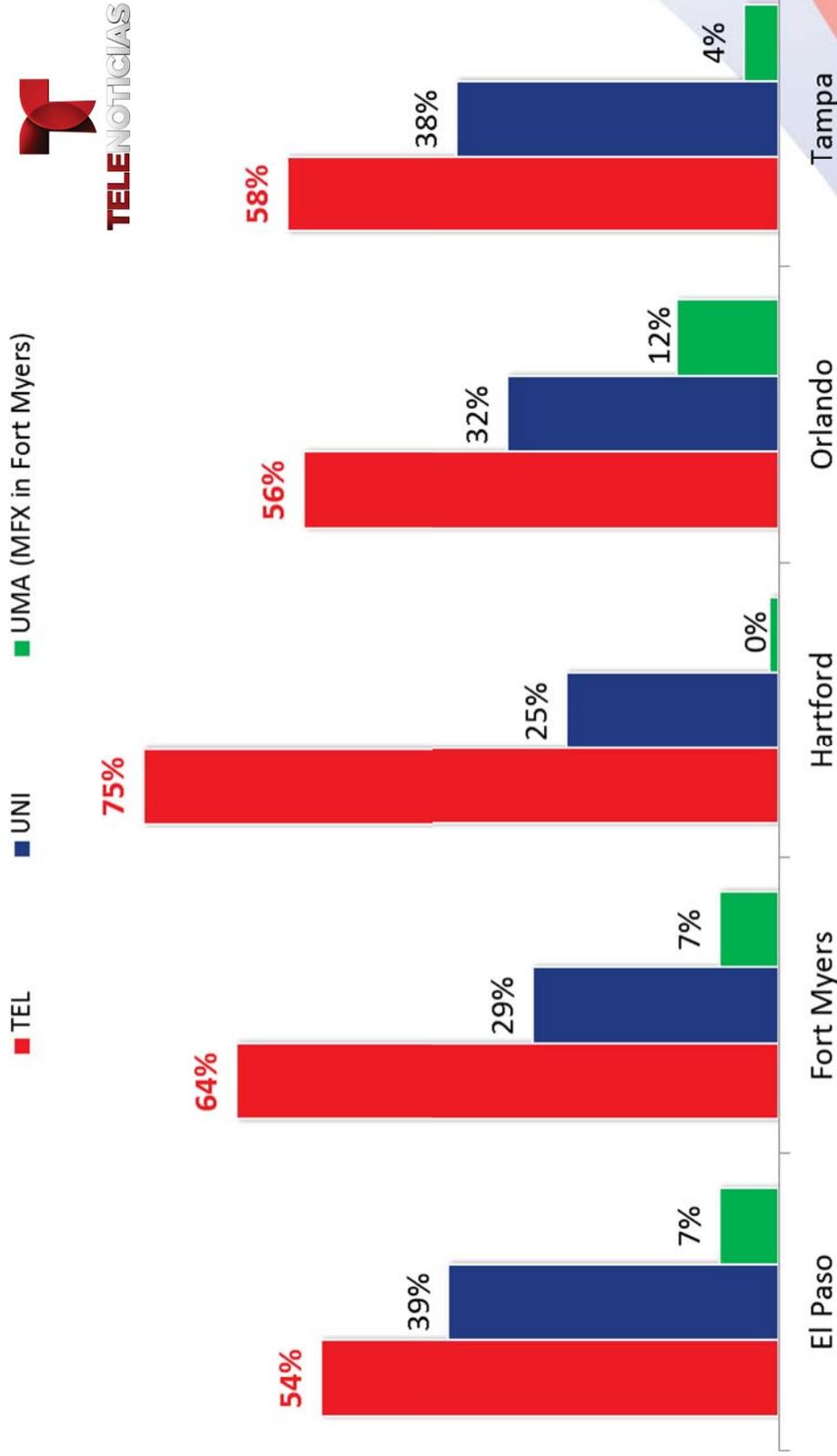
- ZGS stations are local news leaders
- WTMO is the #1 Spanish-language station in Orlando sign-on to sign-off and primetime among major demos
- WRMD leads all Spanish language stations in Tampa in primetime, and has the #1 Spanish-language newscast at 6pm and 11pm
- KTDO is El Paso's #1 station in primetime, regardless of language
- WWDT is the #2 broadcast station in Fort Myers in primetime, regardless of language
- WRDM is the Spanish-language leader in Hartford in primetime among key demos

ZGS STATIONS LEAD PRIMETIME VIEWING IN KEY MARKETS



Source: Nielsen NSI 7 M-F 6-10pm (El Paso) and M-F 7-11pm. May Sweeps 2015. Based on A25-54. Spanish share calculation includes each market's local Telemundo, Univision, and UniMas station, except for Fort Myers which does not include UniMas, but MundoFox.

ZGS LOCAL NEWS IS THE PREFERRED SPANISH- LANGUAGE NEWSCAST IN SEVERAL MARKETS



DIRECTV'S FAILURE TO SERVE

- Systematic refusal to fully serve the Hispanic community
 - Over 12 years of effort to secure carriage
 - Multiple reasonable proposals – no fees, marketing support
 - Sizeable communities denied service
- Only Hispanic community denied local service
 - Only television station with local news NOT carried in market
 - Carry network signal in SD rather than local station in HD
- Marketing efforts misrepresent local station carriage
- Almost all other MVPDs carry ZGS stations

Class A – A poor excuse to deny the Hispanic community local service

DIRECTV SHOULD DO THE RIGHT THING

- DirecTV should commit to fully serving Hispanic communities
- Commit to fairly evaluate local carriage options
 - Consider:
 - Size of Hispanic population in market
 - Stations that produce local news and programming
 - Number of locally active Spanish stations
 - Relative audience shares
- All top local stations should be in DirecTV lineup
- FCC should demand that DirecTV stop denying Hispanic consumers local service

ZGS April 2015 Volume 13 Issue 1



**Eduardo's
Corner**

It was a l-o-n-g, cold winter for those of us in the northeast and mid-Atlantic. But with spring now here, thoughts of upcoming events and initiatives have renewed our energy and enthusiasm!

Our annual Managers Meeting began the year. Warmly welcomed by our team in El Paso, we shared experiences and reviewed top priorities. This year's goal is to be the #1 station in all of our markets. I firmly believe it is doable, as each station's commitment to our communities and viewers, combined with innovation and creativity, will help us expand our reach. This year's inaugural group of ZGS Honors winners proves our optimism is well founded!

To help us be #1, we're giving you the tools and training to excel. We're making major investments in our holaciudad Content Management System, and providing training at all levels. We're equipping our newsrooms with more resources, and implementing more Cloud-based solutions to streamline resource-sharing and improve accessibility.

It's a year-long process, so let us know what works, along with any ideas for improvement. Share your successful strategies, and learn from each other in all areas.

Thank you for your continued inspiration, dedication, and as always - hard work. Un abrazo

Employee and Station Recognition

ZGS Honors: Class of 2014

ZGS Communications introduced the ZGS Honors Award. This employee recognition program highlights individuals that reflect the true spirit of ZGS, a commitment to leadership and

Spotlight

"Orlando Avanza" Launches on WTMO Orlando

In an effort to promote and support the economic development of the Hispanic business community in the region, WTMO Orlando added a new segment to *Telenoticias Xtra*. "Orlando Avanza" is a collaboration between the Hispanic Chamber of Commerce of Metro Orlando and the Hispanic Business Initiative Fund. "Orlando Avanza" will focus on business development, business resources, community events and success stories of local Hispanic entrepreneurs. *Telenoticias Xtra* airs Sundays at 5:30pm.



On-set during Telenoticias Xtra's newest segment

Championship Bout Comes to Southwest Florida

For the first time in its 26-year history, *Boxeo Telemundo* broadcast live from Arcadia, Florida on March 27. WWDT Fort Myers-Naples welcomed the boxing event to a sold-out crowd at the Turner Agri-Civic Center. Local boxing heroes, Daniel Lozano, Toribio Ramirez and Ruben Ozuna flexed their skills to a very energetic crowd. With the success of *Boxeo Telemundo* in the Fort Myers DMA, championship boxing will return to Southwest Florida in its summer and fall series lineups.



Fiorella Papapietro of WWDT's TeleDiario takes center ring

WRDM/WDMR Telemundo Hartford-Springfield Promotes Healthy Lungs

On February 28, WRDM/WDMR Hartford/Springfield took part in the 2015 Fight for Air Climb in New Haven, CT. WRDM/WDMR joined firefighters and local residents and climbed 531 steps of the tallest building in the area to promote the importance of healthy lungs. The station assisted in the fundraising efforts and helped achieve the \$60,000 goal for the event.



Local firefighters line up to climb 531 steps

KTDO El Paso is Recognized by the Komen El Paso Race for the Cure

excellence, and dedication to making a difference in every community we serve. Meet the ZGS Honors Class of 2014 and watch them accept their awards [here](#).



Gary Faller
ZGS Florida



Cynthia Martinez
ZGS Corporate



Gerardo Tamashiro
WZDC Washington DC



Georgina Terrazas
KTDO El Paso

In the Community



Homan Machuca and ZGS Digital's Hector Castillo

WTMO Orlando's Homan Machuca was a featured panelist at the Hispanicize 2015 conference in Miami on March 18. Homan shared his expertise on investigative journalism in the digital age. Hispanicize is a week-long annual gathering of Hispanic trendsetters in film, music, marketing, journalism and social media.

KTDO El Paso was the city's fundraising leader for the March 1 El Paso Race for the Cure held at Southwest University Park. Local media were challenged to get more involved and KTDO stepped up to the task. With generous support from the community and fundraising efforts, the team raised \$7,000. In addition to bragging rights among local media, KTDO will also receive a trophy and prizes courtesy of Susan G. Komen El Paso.



KTDO El Paso presents Komen El Paso a check for \$7,000

WRMD Tampa Helps Crown Best Cuban Sandwich in the Bay Area

On March 21 & 22, Ybor City celebrated the 4th Annual Cuban Sandwich Festival. Hundreds of visitors enjoyed Cuban sandwiches and other cuisine, art, live music and more. Cristina Puig of *Telenoticias Tampa* was of the judges tasked with selecting the "Best Cuban Sandwich of the World." Tia's Authentic Latin Food of Tampa was deemed this year's best.



Cristina Puig of Telenoticias Tampa

Love Overtakes WTMO Orlando and holaciudad!

One of Orlando's most coveted promotions returned in February - *Telemundo Orlando Te Enamora*. In honor of the month of love, viewers were asked to submit a picture and short blurb about why their love story is special. Photos and stories were posted on holaciudad.com. Over 189 couples participated and the contest received over 7,500 votes. Via a combination of on-air and social media elements, *Te Enamora* garnered over 1,000 Facebook likes, 855 new users and over 21,000 page views. Prizes included roses, dinner, spa services and hotel accommodations.



The numerous love photo submissions

El Paso Rules 2015 ZGS Management Meeting

From February 23 through February 26, managers from across all ZGS properties gathered in El Paso for the 2015 ZGS Managers' Meeting. The group shared success stories, ideas and also learned about upcoming priorities of the company. Special awards were also given out and both were swept by KTDO El Paso. Station Manager, Lorena Castañeda received the Ziggy Leadership Award and the station was recognized for outstanding television production with the Eddie Award. You can watch the award winning spot [here](#).



2014 Ziggy winner, Lorena Castañeda with Ronald J. Gordon and Eduardo A. Zavala

WZDC Washington, DC Feeds Local



800 senior citizens gather to enjoy the annual Love Conference

As a yearly tradition, **KTDO El Paso** celebrated Valentine's Day at the Senior Love Conference. 800 seniors enjoyed speakers, entertainment, art, food and more. *Telenoticias El Paso's* on-air team emceed the festivities at the event, which was organized by the El Paso Community College Senior Adult Program.

ZGS Anniversaries

15 Years

WZDC Washington, DC

Daysi Gil

WTMO Orlando

Raul Diaz Jr.

5 Years

WRIW Providence

Edgar Moya

WTMO Orlando

Mario Saint-Hilaire

New Members of the ZGS Family

KTDO El Paso

Amy Ramirez
Carlos Sanchez Mendoza

WRDM Hartford

Steven Rincon
David Rosenthal
Jean Pierre San Martin

WTMO Orlando

Nelson Colon Negrón
Marcos Tamez

WZDC Washington, DC

Jorge Rico Caballero
Jennifer Chavarria
Jousseef Alba Tarifa

ZGS Corporate

Ian Gordon

ZGS Digital

Lyan Babilonia Roman

Families in the DMV

El Tiempo Latino, EMD Sales, Inc. and WZDC Washington, DC teamed up for the event Bolsas de Amor on February 28. *Telenoticias Washington's* Valeria Aponte, Valeria Barriga and Daniel Rivera packed and delivered bags of food to low-income Hispanic families in DC, Maryland and Virginia. Over 500 boxes of food were delivered to approximately 800 families in the DC area.



The Telenoticias Washington team smiles for the camera

The Orlando Magic & WTMO Orlando Team Up for Noche Latina

On March 6, WTMO Orlando celebrated Hispanic culture at the Orlando Magic's annual Noche Latina. The Magic took on the Sacramento Kings and spectators were treated to a concert by duo Angel y Khriz. *Telenoticias Orlando's* Farah Paret also hosted the pre-game Fan Fest, getting one-on-one time with fans in the *Telenoticias* outdoor studio. Viewers got the chance to be a sports anchor for the day and those videos were uploaded on holaciudad.com.



Farah Paret in the outdoor studio

Nielsen Spotlight

February Sweeps Highlights

Nielsen's February 2015 Sweeps was a successful survey for ZGS Station Group:

- **KTDO El Paso** delivered double-digit growth in both primetime and news among total viewers and key adult demos.
- **WRDM Hartford** was the Spanish-language leader in the market in sign-on to sign-off and primetime among several demos, including the coveted adults 18-49 demo.
- **WWDT Fort Myers-Naples** was the Spanish-language leader in the market sign-on to sign-off among adults 25-54 and the primetime leader among adults 18-49 and 25-54.
- **WTMO Orlando** was the Spanish-language leader in the market sign-on to sign-off among adults 25-54. *Telenoticias Orlando* was the #1 Spanish-language newscast at 11pm among all major adult demos.
- **WRMD Tampa** delivered double-digit growth in primetime among adults 18-49 and 25-54. *Telenoticias Tampa* was the #1 Spanish-language newscast at 11pm among total viewers.
- **WZDC Washington, DC** delivered a +40% YOY growth in primetime among key women audiences including women 18-49 and 25-54.



KTDO El Paso · WWDT Ft. Myers-Naples · WRDM Hartford · WTMO Orlando ·
WRIW Providence · WZTD Richmond · WDMR Springfield · WRMD Tampa ·
WZDC Washington DC

WGES 680am · WILC 900am · WAMA 1550am

www.holaciudad.com



2000 N. 14th Street, Suite 400, Arlington, VA 22201, T 703.528.5656 F 703.526.0879
www.zgsgroup.com

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The logo for ZGSbreve, with 'ZGS' in blue and 'breve' in red, set against a background of large, light green, stylized letters.**FOR IMMEDIATE RELEASE**

June 26, 2015

CONTACT: Cynthia Martinez
703-528-5656 Ext. 108**WTMO Telemundo Orlando is the #1 Choice for Spanish-Language Viewers**

Orlando, FL - WTMO Telemundo Orlando is the #1 Spanish-language station in the market sign-on to sign-off (M-Su 6am-2am). According to Nielsen's most recent May survey, Telemundo Orlando commanded almost half of the audience in the coveted adults 25-54 demo. The station was also tied for #1 among total viewers (P2+) for the same time period.

The station's continued success was propelled by its strong performance in primetime, news and early fringe. In primetime, WTMO was the most watched Spanish-language station from 7-11pm Monday through Friday, with a 51% share of the viewing among adults 25-54. *Caso Cerrado Edición Estelar* at 7pm led its time period with a majority share of the audience among adults 18-34, total adults (A18+) and total viewers. Popular novela *Tierra de Reyes* led Spanish TV at 9pm among adults 25-54. Additionally, hit Super Series *El Señor de los Cielos* wrapped up May as the highest-rated Spanish-language primetime program among adults 18-49 and 25-54, commanding more than half of the audience at 10pm.

"Our station's recent success is validation of Telemundo's top-notch programming, our strong local newscast, and the station's innovative promotional initiatives. More people are watching Telemundo Orlando than any other Spanish-language station in the market, making us the clear choice for viewers and advertisers," commented Alex Sanchez, Vice President and General Manager.

Telenoticias Orlando, the station's local news, finished the May rating period as the #1 Spanish-language newscast weeknights at both 6pm and 11pm among several key demos. The 6pm newscast delivered more than half of the audience among total adults and viewers, while the 11pm edition led among adults 18-49 and 25-54.

WTMO also led in early fringe (M-F 4-6pm), with at least 50% of adults 25-54, total adults and total viewers, doubling its audience from last sweeps. Popular news magazine *Al Rojo Vivo Con María Celeste* and court TV show *Caso Cerrado* were both #1 at 4pm and 5pm among the aforementioned demos.

Source: Nielsen Media Research, May 2015 Sweeps, Orlando-Daytona Beach-Melbourne Designated Market Area.

ZGS Communications is a Hispanic-owned media company, headquartered in Arlington, Virginia. The company owns 9 Spanish-language television stations, representing the largest group of independent stations affiliated with the Telemundo network. In addition, ZGS owns three radio stations serving Washington, DC and Tampa, and a Spanish-language web portal holaciudad.com. For over three decades, ZGS has been a leader in the industry with a profound commitment to localism and diversity; proudly serving and celebrating the Hispanic community with local news and programming on multiple platforms, as well as outreach, advocacy and grassroots events.



KTDO El Paso · WWDT Fort Myers-Naples · WRDM Hartford
WTMO Orlando · WRIW Providence · WZTD Richmond
WDMR Springfield · WRMD Tampa · WZDC Washington DC

WGES 680am · WILC 900am · WAMA 1550am

www.holaciudad.com

2000 N. 14th Street, Suite 400, Arlington, Virginia 22201 | 703.528.5656 | www.zgsqgroup.com

The logo for ZGSbreve, with 'ZGS' in blue and 'breve' in red, set against a background of large, light green, stylized letters.**FOR IMMEDIATE RELEASE**

June 23, 2015

CONTACT: Cynthia Martinez
703-528-5656 Ext. 108**WWDT Telemundo Fort Myers-Naples is the Market Leader in Primetime**

Fort Myers-Naples, FL - WWDT Telemundo is the most watched Spanish-language broadcast station in Fort Myers-Naples during primetime (M-Su 7-11pm), as reflected in Nielsen's most recent survey. The station commanded at least half of the audience in the coveted adults 18-49 and 25-54 demos. Telemundo Fort Myers-Naples was also the #2 station in the market, regardless of language, among adults 18-34, trailing first place by only 0.2 rating point.

Telemundo Fort Myers-Naples has steadily increased its primetime share to overtake the competition for the #1 spot in several time periods, regardless of language. Hit novela *Tierra de Reyes* was #1 in the market at 9pm, among adults 18-34, while commanding the majority share of the Spanish TV audience in adults 18-49 and total viewers (P2+). At 10pm, *El Señor de los Cielos* surpassed all stations in the market among adults 18-34 and 18-49. The popular Super Series delivered ratings at least 60% higher than the closest competitor, dominating the #1 spot, regardless of language.

Telemundo Fort Myers-Naples also led Sunday primetime with *La Voz Kids*. The reality singing competition surpassed all other Spanish TV programs 8-10pm, to command an impressive two-thirds of the adults 18-49 and 25-54 audience.

"We are honored to continuously lead our competitors and to be in second place in primetime, regardless of language. Our excellent performance has shown how strong the growing Hispanic voice is in Southwest Florida," commented Daniel Navarrete, Station Manager.

Telemundo Fort Myers-Naples also continues to be the preferred choice for Hispanic viewers sign-on to sign-off (M-Su 6a-2a). The station led with adults 18-34, delivering 54% of this key segment.

Source: Nielsen Media Research, May 2015 Sweeps, Fort Myers-Naples Designated Market Area.

ZGS Communications is a Hispanic-owned media company, headquartered in Arlington, Virginia. The company owns 9 Spanish-language television stations, representing the largest group of independent stations affiliated with the Telemundo network. In addition, ZGS owns three radio stations serving Washington, DC and Tampa, and a Spanish-language web portal holaciudad.com. For over three decades, ZGS has been a leader in the industry with a profound commitment to localism and diversity; proudly serving and celebrating the Hispanic community with local news and programming on multiple platforms, as well as outreach, advocacy and grassroots events.



KTDO El Paso · WWDT Fort Myers-Naples · WRDM Hartford
WTMO Orlando · WRIV Providence · WZTD Richmond
WDMR Springfield · WRMD Tampa · WZDC Washington DC

WGES 680am · WILC 900am · WAMA 1550am

www.holaciudad.com

2000 N. 14th Street, Suite 400, Arlington, Virginia 22201 | 703.528.5656 | www.zqsgroup.com

The image shows a large, stylized 'WRMD' logo in the background. In the foreground, the text 'ZGSbreve' is displayed in a blue and red font.

FOR IMMEDIATE RELEASE
June 22, 2015

CONTACT: Cynthia Martinez
703-528-5656 Ext. 108

WRMD Telemundo Tampa is the #1 Choice for Spanish-Language News

Tampa, FL - Since launching *Telenoticias Tampa* in September 2014, WRMD Telemundo Tampa has steadily increased its audience to become the #1 Spanish-language news station in the market. According to Nielsen's May 2015 survey, *Telenoticias Tampa* was the most-watched Spanish-language newscast weeknights at 6pm and 11pm. The station delivered more than half of coveted news audiences in several key demos, including adults 18-49, 25-54, and total adults (P18+). The late edition was also #2 among all broadcast stations in the market, regardless of language, with adults 18-34.

Both editions of *Telenoticias Tampa* experienced increased viewership versus the same time period last sweeps. *Telenoticias Tampa* at 6pm delivered double-digit gains in its time period, up +67% in adults 25-54. The 11pm newscast more than doubled its audience among adults 18-49 and increased +33% among adults 25-54 and total adults.

"With less than one year on the air, we are thrilled with the response *Telenoticias Tampa* has received. This speaks to our audience's loyalty, as well as to the amazing work that the *Telenoticias Tampa* team has been doing in delivering relevant news Monday through Friday," commented Jayme Ribeiro Neto, General Manager.

Additionally, WRMD Telemundo Tampa was the most-watched Spanish-language station in primetime (M-F 7-11pm), among adults 18-49 and adults 25-54. The station commanded at least half of the audience during the time period. *Caso Cerrado Edición Estelar* kicked off the strong primetime performance at 7pm, delivering more than twice the audience of the closest Spanish TV competitor. Super Series *El Señor de los Cielos* rounded out the primetime lineup, with a solid, winning performance at 10pm.

Source: Nielsen Media Research, NSI May 2015 sweeps, Tampa-St. Petersburg (Sarasota) Designated Market Area.

ZGS Communications is a Hispanic-owned media company, headquartered in Arlington, Virginia. The company owns 9 Spanish-language television stations, representing the largest group of independent stations affiliated with the Telemundo network. In addition, ZGS owns three radio stations serving Washington, DC and Tampa, and a Spanish-language web portal holaciudad.com. For over three decades, ZGS has been a leader in the industry with a profound commitment to localism and diversity; proudly serving and celebrating the Hispanic community with local news and programming on multiple platforms, as well as outreach, advocacy and grassroots events.



KTDO El Paso · WWDT Fort Myers-Naples · WRDM Hartford
WTMO Orlando · WRIV Providence · WZTD Richmond
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July 2, 2015

Honorable Tom Wheeler, Chairman
Federal Communications Commission
Washington, DC 20554
tom.wheeler@fcc.gov

Hon. Clyburn, Commissioner
Federal Communications Commission
Washington, DC 20554
mignon.clyburn@fcc.gov

Hon. Ajit Pai, Commissioner
Federal Communications Commission
Washington, DC 20554
ajit.pai@fcc.gov

Hon. Jessica Rosenworcel, Commissioner
Federal Communications Commission
Washington, DC 20554
jessica.rosenworcel@fcc.gov

Hon. Michael O’Rielly, Commissioner
Federal Communications Commission
Washington, DC 20554
michael.orielly@fcc.gov

Re: MB Docket No. 14-90
In the Matter of Applications of AT&T, Inc. and DirecTV
for Consent to Assignment or Transfer of Control of Licenses

Dear Chairman Wheeler and Commissioners:

A letter sent to you on June 29, 2015, by ZGS Communications, Inc. in connection with the above-captioned matter has been brought to my attention. ZGS noted the difficulty that its Hispanic Class A television stations have had in obtaining satellite carriage by DirecTV. ZGS is not the only Hispanic-oriented broadcaster that has had this problem. My company has had the same experience with DirecTV – an experience that stands in contrast to the behavior of all the other MVPDs in our market, including DISH Network.

I support the ZGS letter. My company, Korean American TV Broadcasting Corp. is the licensee of Class A digital television station WKTB-CD, Norcross, Georgia. We are the Telemundo network affiliate for the Atlanta DMA. Like ZGS, we have the utmost respect for our FCC license, and we view our responsibility as a local broadcaster as an opportunity and honor to serve the community. We work very hard to provide local service to our Hispanic audience. According to Nielsen ratings, we are among

Honorable Tom Wheeler, Chairman *et al.*

July 2, 2015

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the top two Spanish language broadcasters in the DMA. Our station, despite not having legal must-carry rights, is carried by every major MVPD in the market, including both cable and DISH Network, in both standard and high definition formats, and on the basic tier. We have earned this distribution based on the merits of our service. *ONLY* DirecTV refuses to carry our signal. Instead they carry a national Telemundo network feed in SD, undermining our attempt to enjoy the benefit of our network affiliation and depriving their customers of the local component of our service, despite the fact that Hispanics make up 10% of the population of our DMA.

Our station is minority and woman owned and managed. Failure to carry a top Spanish language station in the DMA puts the station at a disadvantage and Hispanic viewers at a disadvantage. There are only two Spanish language stations that produce local news in the Atlanta DMA. While DirecTV carries two local Spanish language stations, a full power and a low power station, only the full power station actually broadcasts a local newscast leaving subscribers with no choice when it comes to viewing local news and information in Spanish. Our station provides more local news in Spanish than any other station in the State of Georgia, including both general market and Spanish language stations. For eight months in 2014-2015, our 11:00 p.m. newscast was viewed in more than 50% of Spanish language households in the Atlanta DMA. A week ago, we launched a one-hour local newscast at 5:30 p.m. Our station has received over 13 Emmy® Awards since 2012, including Best Newscast in 2014 and Station Excellence Emmy® Awards consecutively in 2013-2014. We work passionately day in and day out to provide a lifeline of Hispanic-centric local news for the Hispanic community -- vital news that provides awareness and advancement while living their daily lives in Georgia, including weather reports, public safety, state and local legislation and much more. By not opting to carry Telemundo Atlanta, DirecTV has blocked its subscribers from having a choice and has left them with no option but to view a single source of local news in Spanish.

Why does only DirecTV ignore us? Respectfully, their attention to local audience needs is difficult to discern when all we want to do is extend local programming using one of the most viable methods of disseminating relevant news and information to a community that deserves more than one choice for local news in Spanish. We hope that the FCC will encourage AT&T to do better if AT&T's acquisition of DirecTV is approved. This letter is not intended to harm or impede the merger between AT&T and DirecTV, rather open doors for conversation on how the Hispanic community in Atlanta can be further served.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. Oh', with a long horizontal flourish extending to the right.

Susan Sim Oh, President

cc: Michael D. Nilsson, Esq., Counsel for DirecTV
Peter J. Schildkraut, Esq., Counsel for AT&T