



CBS
51 WEST 52 STREET
NEW YORK, NEW YORK 10019

(212) 975-8730
FAX (212) 975-0117
john.bagwell@cbs.com

JOHN W. BAGWELL
VICE PRESIDENT,
ASSOCIATE GENERAL COUNSEL

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

Attention: William Lake, Chief
Media Bureau

Re: PMCM TV, LLC
Station WJPL(TV), Middletown Township, New Jersey
FCC Facility ID No. 86537
Supplement to Application for Review
Emergency Request for Relief
MB Docket No. 14-150

Dear Ms. Dortch:

September 22, 2015

CBS Broadcasting Inc., licensee of station KYW-TV, Philadelphia, Pennsylvania, Facility ID No. 25453, hereby responds to the above-referenced Supplement to Application for Review and Emergency Request for Relief ("Request") filed by PMCM TV, LLC ("PMCM").

In its Request, PMCM states that some over-the-air viewers "are apparently unable to receive WJLP(TV) by tuning to Channel 33," the virtual channel the Commission designated for WJLP(TV)'s use. PMCM also reports that it conducted tests with a number of digital television receivers and converters, some of which did not correctly display WJLP(TV) on Channel 33.

To the extent PMCM has identified commercial digital television receivers and converters that do not properly tune WJLP(TV) on Channel 33, it appears that such equipment fails to "be capable of adequately receiving all channels allocated by the

Page Two
September 22, 2015

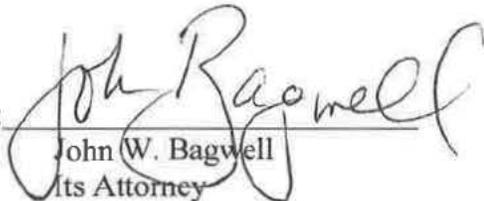
Commission to the television broadcast service," as required by the FCC's rules. *See* 47 C.F.R. § 15.117(b).

The FCC should take appropriate enforcement action against such equipment manufacturers. The need for FCC action is particularly important given that the impact of such equipment performance problems is likely to be exacerbated once broadcast television stations are operating on fewer RF channels following the upcoming incentive spectrum auction.

However, the alleged failure of equipment manufacturers to sell television receivers and converters that function properly and comply with the FCC's requirements does not lead to the conclusion that new-to-the-market WJLP(TV) should be permitted to operate on a virtual channel number (or with a common major channel number) that overlaps the service contours of television stations that have generated viewer loyalty and goodwill on that same major channel number for decades.

Respectfully submitted,

CBS BROADCASTING INC.

By: 
John W. Bagwell
Its Attorney

CERTIFICATE OF SERVICE

I, Debbie Santelli, hereby certify that on this 22nd day of September, 2015, do hereby certify that a true and correct copy of the foregoing was served by first-class U.S. mail, postage-prepaid, and/or, as noted below, sent by electronic mail to the following:

Tara M. Corvo
Mary Lovejoy
Seth Davidson
Mintz, Levin, Cohn, Ferris,
Glovsky and Popeo, P.C.
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004-2608

Frederick W. Giroux
Davis Wright Tremaine LLP
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, D.C. 20006-3401

William LaBeau
Holland & Knight
800 17th Street, N.W., Suite 1100
Washington, D.C. 20006

Michael D. Basile
John S. Logan
Cooley LLP
1299 Pennsylvania Avenue, N.W.
Suite 700
Washington, D.C. 20004

Donald J. Evans
Harry F. Code
Anne Goodwin Crump
Fletcher, Heald & Hildreth, P.L.C.
1300 N. 17th Street – 11th Floor
Arlington, VA 22209

Mace Rosenstein
Eve Pogoriler
Stephen Kiehl
Covington & Burling LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Hossein Hashemzadeh
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
(By email: Hossein.hashemzadeh@fcc.gov)

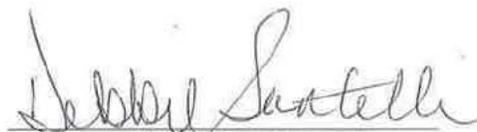
Joyce Bernstein
Video Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
(By email: Joyce.Bernstein@fcc.gov)

William Lake
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
(By email: William.lake@fcc.gov)

Barbara Kreisman
Video Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
(By email: Barbara.kreisman@fcc.gov)

Seth A. Davidson
Ari Z. Moskowitz
Edwards Wildman Palmer LLP
1255 23rd Street, N.W., 8th Floor
Washington, D.C. 20037

Keith R. Murphy, Senior Vice President
Government Relations & Regulatory Counsel
Viacom, Inc.
1501 M Street, N.W., Suite 1100
Washington, D.C. 20005


Debbie Santelli

September 22, 2015