Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re:	)	
	)	
PMCM TV, LLC	)	
	)	CSR-_____
Must-Carry Complaint Regarding	)	
Television Station WJLP(DT),	)	
Middletown Township, New Jersey	)	

To: Office of the Secretary
Attn: The Commission

MUST-CARRY COMPLAINT

PMCM TV, LLC ("PMCM"), pursuant to Section 614 of the Communications Act of 1934, as amended (47 U.S.C. Section 534), and Sections 76.7 and 76.61 of the Commission's Rules, hereby files this Complaint requesting that the Commission order Time Warner Cable, including any subsidiaries or affiliates ("TWC") to carry local commercial television station WJLP(DT), licensed to serve Middletown Township, New Jersey (the "Station") on its over-the-air channel number 3 in accordance with the Commission's must carry rules and policies on all cable television systems owned and operated by TWC throughout the New York, New York designated market area (the "DMA") for the remaining duration of the current must carry election cycle, expiring December 31, 2017.

I. ACTION BY THE FULL COMMISSION IS CALLED FOR

The right of Station WJLP(DT) to be carried on cable channel 3 and/ or be assigned major PSIP channel 3 has been before the Commission four or five times over the last year and a half. The full Commission has not acted on any of the various applications for review which have been presented to it. Without guidance from the Commission, the Bureau has had to deal with novel issues of PSIP assignment which have resulted not only in a bizarre result here (e.g., finding that

WJLP(DT)'s channel is allotted to both the Hartford-New Haven DMA *and* the Philadelphia DMA but not to the New York DMA where the station is actually firmly placed by the Table of Allotments). The Bureau has also followed a policy, as noted above, of deeming a station's "over-the-air" broadcast channel to be its PSIP channel rather than the channel on whose frequency it radiates a broadcast signal. This policy, which appears to fly directly in the face of the statutory mandate, has never been reviewed by the full Commission.

These circumstances have left all of the parties in a state of limbo since the full Commission has not definitively affirmed WJLP(DT)'s statutory right to be carried on its over the air channel. Everyone has had to tread water awaiting a clear declaration from the Commission, leaving many of the 22 million hapless consumers in the New York DMA unable to view WJLP(DT)'s programming at all (because their cable system is not carrying it or because half the TV sets in the United States do not properly translate PSIP channels into viewing channels in the circumstances presented here). Where WJLP(DT)'s channel is available, it pops up on different channels on different cable systems, making it difficult for consumers in different parts of the market to locate the cable channel on which it can be found. The unanticipated problem with PSIP reception also restricts the ability of the Commission to repack channels in the aftermath of the Incentive Auction and will require a major public education effort on a par with the DTV transition program to alert viewers that they will have to take unusual steps to watch the channels they want to watch.

There is therefore an urgent need for the Commission to untangle this situation quickly since the current situation seems to be spawning an ever-widening circle of unanticipated consequences that could radically upset the way TV stations are received and identified in this country.

II. TIME WARNER HAS DENIED WJLP(DT) ITS FULL CARRIAGE AND CHANNEL PLACEMENT RIGHTS

In a letter dated October 22, 2015 (the "Carriage Request"), PMCM notified TWC that its failure to carry the Station throughout the DMA on its over-the-air Channel 3 constituted a failure

by TWC to comply with the Communications Act and the Commission's must-carry rules. A copy of the Carriage Request is attached to this Petition at its Exhibit 1. The Carriage Request demanded that TWC commence carriage of the Station on channel 3 on all of TWC's cable systems serving the DMA. TWC responded by letter dated November 19, 2015 denying PMCM's request for carriage on Channel 3 (the "Carriage Denial"). A copy of the Carriage Denial is attached to this Petition at its Exhibit 2.

Section 76.61(a)(5) provides that any must-carry complaint must be filed within 60 days of either a cable operator's denial of a carriage request or the expiration of the 30-day response period set forth in Section 76.61(a)(2). TWC's Carriage Denial was dated November 19, 2015, and this Complaint is therefore timely filed under Section 76.61(a)(5).

III. WJLP IS ENTITLED TO MANDATORY CARRIAGE ON CHANNEL 3 ON ALL OF TWC'S CABLE SYSTEMS IN THE NEW YORK, NEW YORK DMA

Under the Communications Act and the Commission's Rules, a station is entitled to mandatory carriage on cable systems if it is a "local commercial television station," as defined in Section 614(h)(1) of the Communications Act and Section 76.55(c) of the Commission's Rules. Sections 614(h)(1) and 76.55(c) define a "local commercial television station" as any full power television broadcast station that is 1) licensed to a community within the same television market as the cable system, 2) not considered a distant signal pursuant to the cable compulsory copyright license, and 3) capable of delivering a good quality over-the-air signal to the system's principal headend or willing to agree to be responsible for the costs of delivering such a signal through alternative means. WJLP(DT) qualifies as a local commercial television station on the New York DMA Systems operated by TWC and therefore is entitled to mandatory carriage.

Pursuant to Section 614(b)(6) of the Communications Act and Section 76.57 of the Commission's Rules, a station is entitled to carriage on (i) the channel number on which the station is "broadcast over the air," (ii) the channel number on which the station was carried on July 19,

1985 or January 1, 1992, or (iii) a channel mutually agreed to by the station and cable television system operator. WJLP(DT) broadcasts on over the air RF channel 3, and was not carried on TWC's systems in 1985 or 1992. Pursuant to Section 76.57(e) a station is to notify the cable system of its channel election at the same time as it elects must-carry status. By letter dated September 18, 2014, a copy of which is attached to this Petition as Exhibit 3, PMCM elected mandatory carriage on Channel 3 on all systems operated by TWC in the DMA.

As the Commission is well aware, a dispute arose regarding the "virtual" PSIP channel to be used by WJLP(DT). As a result of that dispute TWC, along with a number of other MVPDs, requested that the Commission allow those MVPDs to defer implementing WJLP(DT)'s carriage and channel positioning election. The Media Bureau granted that deferral by letter dated July 25, 2014.[1] In June 2015, in two separate letter decisions, the Bureau (i) determined that WJLP(DT) would be assigned PSIP channel 33,[2] and (ii) lifted its deferral of WJLP(DT)'s carriage rights.[3] In the Carriage Letter Decision, the Bureau gave PMCM the option of accepting carriage on Channel 33, or invoking the Commission's complaint procedures to enforce its previous election for carriage on Channel 3.

In its Carriage Denial, TWC claims that current law provides WJLP(DT) with no right to claim carriage on Channel 3, and that TWC is not required to carry WJLP(DT) on the requested Channel 3 based on PMCM's "assent" to carriage on an alternative channel position. TWC strongly disputes TWC's claims regarding WJLP(DT)'s right to claim carriage on Channel 3. As PMCM has explained in detail in its previous filings with the Commission both Section 614(b)(6) of the

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[1] *Tara M. Corvo, Esq., Frederick W. Giroux, Esq., Seth A. Davidson, Esq., Donald J. Evans, Esq.*, 29 FCC Rcd 9102 (MB 2014) ("Deferral Letter Decision").

[2] *Tara M. Corvo, Esq., Frederick W. Giroux, Esq., Seth A. Davidson, Esq., Donald J. Evans, Esq.*, 30 FCC Rcd 6078 (MB 2015) ("PSIP Letter Decision").

[3] *Tara M. Corvo, Esq., Frederick W. Giroux, Esq., Seth A. Davidson, Esq., Donald J. Evans, Esq.*, 30 FCC Rcd 6116 (MB 2015) ("Carriage Letter Decision").

Communications Act and Section 76.57 of the FCC's rules require a cable operator to carry a local broadcast station electing "must-carry" status on the channel on which the station is broadcast "over the air." Channel 3 is the channel designated by the FCC Table of Allotments for WJLP to broadcast over the air, and that is in fact that channel on which the station broadcasts.

We note in this regard that the Media Bureau has in some cases taken the position that a must-carry station's cable carriage position is determined by its major PSIP number rather than the channel associated with the frequency on which it broadcasts over the air. PMCM respectfully suggests that that position is directly at odds with Section 614(b)(6) of the Act, which requires carriage "on the cable system channel number on which the local commercial television station is broadcast over the air." The FCC's Post- DTV Transition Table of Allotments specifies that the "channel" allotted to Middletown Township is channel "3" and the frequency on which channel 3 must broadcast over the air is 60-66 Mhz. 47 C.F.R Section 73.603(a). Indeed, Part 73 repeatedly and universally identifies a station's "channel" with the channel allotted to it in the Table of Allotments and the frequency on which it radiates its signal. To define a station's channel in any other way (such as by its PSIP major channel number which may be arbitrarily assigned by the Commission) would subvert the entire channel-based regulatory scheme of Part 73 of the rules.

This is especially true for two reasons. First, Section 614(h)(1)(A) of the Act defines a local commercial television station to be a station "licensed and operating on a channel regularly assigned to its community by the Commission that, with respect to a particular cable system, is within the same cable television market as the cable system." PSIPs are not the channel of which stations are "licensed," nor are PSIPs "assigned to communities." For cable carriage purposes, therefore, a station whose "channel" is defined by a PSIP channel different from the channel allotted to it in the Table of Allotments would not be entitled to cable carriage at all since it would not meet the statutory definition of a local commercial television station. Yet Congress plainly and expressly

intended all of the cable carriage rights set forth in Section 614 to attach to stations operating over the channels which are found in the Table of Allotments where channels *are* assigned to local communities. To now suddenly tie cable carriage rights exclusively to PSIPs rather than allotted channels would in one stroke upset the cable carriage rights of possibly hundreds of stations across the country. This cannot be what Congress intended, and implementation of this interpretation would again wreak chaos in the broadcast marketplace. Indeed, if PSIPs were to exclusively govern carriage rights, Congress would certainly have written that requirement into the statute.

Second, as PMCM has pointed out elsewhere, the Spectrum Act[4] bars the Commission from involuntarily changing any TV station's channel until the Incentive Auction is over. WJLP operated on channel 3 with PSIP major channel 3 for almost five years. If its "channel" were deemed to be defined by its PSIP, a compelled change from channel 3 to channel 33 would plainly constitute a change in its channel in direct violation of the Spectrum Act.

While PMCM concedes that it has agreed to interim carriage on an alternative channel position on TWC's systems, the terms of that agreement, as TWC concedes in its Carriage Denial, set forth that such agreement governs carriage only until the FCC or Court of Appeals for the District of Columbia Circuit rules on the channel position to which WJLP(DT) is entitled.[5] To

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[4] Middle Class Tax Relief and Job Creation Act, 47 U.S.C. §1452(g)(1)(A). "During the [pre-Incentive Auction] period described in Paragraph 2, the Commission may not –

(A) Involuntarily modify the spectrum usage rights of a broadcast television licensee *or reassign such a license to another television channel* except –

(i) in accordance with this section; or in the case of a violation of its license or a specific provision of a statute administered by the Commission promulgated under any such provision… (Emph. added.).

[5] PMCM also notes that it entered into the interim channel placement agreement on the understanding that TWC would make WJLP(DT) available on the basic service tier, as required by Sections 76.57(f) and 76.901(a) of the Commission's Rules. It now appears that TWC in fact has not made Channel 1239 a part of its basic service tier. Regardless of what action the Commission takes regarding WJLP(DT)'s right to placement on Channel 3, PMCM respectfully requests that the Commission order TWC to make WJLP(DT)'s signal available on the basic service tier on all of its systems.

obtain such a decision from the FCC, PMCM must file this complaint; absent Commission decision on this complaint, the issue of WJLP(DT)'s channel positioning rights remains unsettled. In its June 5 Carriage Letter Decision, the Media Bureau explicitly provided that, in the event cable systems refused to carry WJLP(DT) on its requested Channel 3, that "PMCM may choose to invoke the cable carriage enforcement procedures" set forth in the Communications Act and the Commission's Rules. PMCM, by initiating this complaint procedure, has done just that.

CONCLUSION

PMCM is entitled to mandatory carriage of the signal of WJLP(DT) on its over-the-air Channel 3 on all cable systems operated by TWC in the New York DMA. WJLP(DT) has properly elected mandatory carriage, has notified TWC of its choice to be carried on its over-the-air Channel 3, has notified TWC of its failure to comply with the Commission's mandatory carriage rules with respect to WJLP(DT), and has requested that TWC commence carriage of the Station on Channel 3. TWC has denied PMCM's request, forcing PMCM to file this Complaint. For the reasons set forth herein, PMCM hereby respectfully requests that the Commission order TWC to carry WJLP(DT) on Channel 3 throughout the New York, New York DMA in accordance with the Communications Act and the Commission's must carry rules and policies adopted to implement the Act. Given the lengthy time – more than a year and a half – during which WJLP(DT) has been denied carriage on its rightful channel, expedited action by the Commission would be appropriate.

Respectfully submitted,

PMCM TV, LLC

By: _____

Donald J. Evans
Harry F. Cole
Daniel A. Kirkpatrick
Its Counsel

FLETCHER, HEALD & HILDRETH, PLC
1300 North 17th Street, Suite 1100
Arlington, VA 22209
(703) 812-0400

January 19, 2016

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re:	)	
	)	
PMCM TV, LLC	)	
	)	CSR-_____
Must-Carry Complaint Regarding	)	
Television Station WJLP(DT),	)	
New York, New York	)	

To: Office of the Secretary
Attn: Chief, Media Bureau

DECLARATION OF ROBERT MC ALLAN

1. My name is Robert Mc Allan. I am Managing Member of PMCM TV, LLC, licensee of WJLP(DT).
2. I have reviewed the foregoing Must-Carry Complaint and all factual matters set forth therein are true to the best of my knowledge and belief. To the best of my knowledge, information, and belief formed after reasonable inquiry, the foregoing Must-Carry Complaint is well grounded in fact; warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; and is not interposed for any improper purpose.
3. On September 18, 2014, WJLP(DT) (then operating under call sign KVNV(DT)) sent a letter to Time Warner Cable ("TWC") electing mandatory carriage of the station's signal on Channel 3 all cable systems operated by TWC in the New York, New York DMA during the election cycle expiring December 31, 2017.
4. On October 22, 2015, I mailed a letter to TWC notifying TWC of its failure to retransmit the signal of WJLP(DT) on Channel 3 on all of its cable systems in the New York DMA and requesting that TWC commence such carriage. Postal records show that letter was received by TWC on October 26, 2015.
5. TWC responded by letter dated November 20, 2015 denying WJLP(DT)'s request for carriage on Channel 3.

Robert E Mc Allan

Robert Mc Allan
Managing Member
PMCM TV, LLC

Date: 1/16/2016

EXHIBIT 1

October 22, 2015 Carriage Request

7002 2030 0003 3557 4735

CH 2 Wilmington, Delaware / CH3 Middletown, New Jersey

October 22, 2015

Via Certified Mail, Return Receipt Requested

Time Warner Cable
60 Columbus Circle
New York, NY 10023
Attention: Mr. Andrew Rosenberg

Re: Carriage of WJLP(DT), Middletown Township, New Jersey

Dear Mr. Rosenberg,

PMCM TV, LLC ("PMCM") is the licensee of television station WJLP(DT). WJLP(DT) is licensed to Middletown Township, New Jersey, which is located within the New York, New York Designated Market Area (the "DMA"). Time Warner Cable operates one or more cable television systems serving communities located within the New York DMA. As more fully described herein, PMCM hereby puts you on notice in accordance with Section 76.61 of the rules of the Federal Communications Commission (the "FCC") that Time Warner Cable carriage of WJLP(DT) on the Systems is not compliant with our must-carry election or the Commission's rules.

By letter dated October 22, 2015 and pursuant to Section 76.64(f) of the FCC's rules, PMCM elected mandatory carriage on the Systems for the election cycle beginning on January 1, 2015 and ending December 31, 2017.[1] Because WJLP(DT)[2] elected must-carry status on the Systems and because WJLP(DT) is a local commercial broadcast television station with respect to the Systems, WJLP(DT) is entitled to mandatory carriage on the Systems. Pursuant to Section 76.57 of the FCC's rules, WJLP(DT) elected to be carried on Channel 3, the station's over-the-air channel number.

Carriage of WJLP(DT) will not cause the Systems to exceed the maximum number of signals a cable system is required to carry under the FCC's must carry rules. WJLP(DT) does not and will not share a broadcast network affiliation with, or substantially duplicate the programming of, any other local commercial broadcast television station in the New York DMA. In the unlikely event that Time Warner Cable is unable to receive a "good-quality" over the air

[1] PMCM notes that even if it had not delivered a timely election letter, the station would have defaulted to must-carry status under Section 76.64(f)(3) of the FCC's rules.
[2] At the time it made the election WJLP(DT) used call sign KVNV, but it has subsequently changed to WJLP(DT).

signal from WJLP(DT), PMCM agrees, at its own cost, to ensure deliver of a good quality signal of WJLP(DT) through alternative means.

Both Section 614(b)(6) of the Communications Act and Section 76.57 of the FCC's rules require a cable operator to carry a local commercial broadcast station electing "must-carry" status on the channel on which the station is broadcast "over the air." Channel 3 is the channel designated by the FCC Table of Allotments for WJLP to broadcast over the air, and that is in fact that channel we broadcast on. There therefore is no lawful reason for Time Warner Cable to refuse to carry WJLP (DT) on Channel 3 on any part of the Systems.

We understand that Time Warner Cable currently fails to carry the signal of WJLP(DT) on Channel 3 in at least some of the communities served by the Systems. PMCM is therefore notifying you pursuant to Section 76.61(a)(1) of the FCC's rules that Time Warner Cable has failed to meet its statutory and regulatory carriage obligations.

Although this notice is necessary to preserve PMCM's rights under the FCC's rules, we continue to hope that Time Warner Cable carriage of WJLP(DT) on the proper channel will commence without resort to the FCC's complaint procedures.

Thank you for your attention to this matter.

Sincerely,

Robert Mc Allan
Managing Member, PMCM TV LLC

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Time Warner Cable
60 Columbus Circle
NY, NY 10023

9590 9403 0357 5163 2603 55

2. Article Number *(Transfer from service label)*

7002 2030 0003 3557 4735

COMPLETE THIS SECTION ON DELIVERY

A. Signature

x V. Peter

☐ Agent
☐ Addressee

B. Received by *(Printed Name)*: V. Peter

C. Date of Delivery: 10/26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
Restricted Delivery
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

PS Form 3811, April 2015 PSN 7530-02-000-9053 — Domestic Return Receipt

7002 2030 0003 3557 4735

U.S. Postal Service™
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(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage	$ 48
Certified Fee	330
Return Reciept Fee (Endorsement Required)	220
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$ 648

Postmark Here
OCT 28 2015
NEPTUNE NJ 07753-9998
NEPTUNE POST OFFICE

Sent To: Time Warner Cable
Street, Apt. No.; or PO Box No.: 60 Columbus Circle
City, State, ZIP+4: NY NY 10023

PS Form 3800, June 2002 — See Reverse for Instructions

7002 2030 0003 3557 4735

EXHIBIT 2

November 20, 2015 Carriage Denial Letter

Time Warner Cable

Andrew Rosenberg
Senior Vice President
Content Acquisition

November 19, 2015

Via Overnight Mail

Robert McAllan
Managing Member
PMCM TV, LLC
1329 Campus Parkway
Neptune, NJ 07753

Re: Carriage of WJLP(DT), Middletown Township, New Jersey

Dear Mr. McAllan:

Time Warner Cable Inc. ("TWC") is in receipt of your letter of October 22, 2015, alleging that TWC has failed to meet its statutory and regulatory obligations with respect to the cable channel on which it is carrying WJLP(DT).[1] As you know, TWC's systems within the New York DMA currently carry WJLP (which is an affiliate of the MeTV network) on Cable Channel 1239, the channel on which TWC previously carried the MeTV network feed. In correspondence exchanged between TWC and PMCM in late July and early August of this year, PMCM assented to TWC's placement of WJLP on Cable Channel 1239 while reserving its right to claim legal entitlement to an additional cable channel position in the event it succeeded in its effort to overturn FCC rulings holding that a digital television station's "on-channel" carriage right is determined by reference to the station's PSIP channel, not the station's "RF" channel.

The FCC has not, as yet, reversed those rulings. Thus, as the law currently stands, WJLP, which has been assigned PSIP channel 33, has no right to demand carriage on Cable Channel 3 (WJLP's "RF" channel). *See, e.g., KQSA, LLC v. Cox Cable Comm.*, Memorandum Opinion and Order, 27 FCC Rcd 13185, 13186-87 (MB 2012).[2] PMCM was given the opportunity to update its channel placement election to select Cable

[1] Your October 22, 2015 letter states that "By letter dated October 22, 2015 and pursuant to Section 76.64(f) of the FCC's rules, PMCM elected mandatory carriage" on the relevant TWC systems. TWC notes that PMCM previously elected carriage on Cable Channel 3 in a letter dated September 18, 2014. TWC is unaware of any election letter from PMCM dated October 22, 2015; in any event, a new election letter dated October 22, 2015 would have been untimely under the terms of the Media Bureau's Letter to Counsel dated June 5, 2015 (DA 15-667).

[2] *See also In re PMCM TV, LLC*, No. 15-1058 (DC Cir.), Opposition of the Federal Communications Commission to Petition for Writ of Mandamus (filed June 19, 2015) at 6-7 and cases cited therein.

60 Columbus Circle
New York, NY 10023
Tel (212) 364-8501
Fax (704) 973-6219
andrew.rosenberg@twcable.com

Channel 33 (the cable channel that corresponds to WJLP's PSIP channel), but chose not to do so.[3] Consequently, even without WJLP's assent, TWC's placement of WJLP on Cable Channel 1239 is proper. *See, e.g., Continental Cablevision of Sierra Valleys, Memorandum Opinion and Order*, 10 FCC Rcd 958 (1995) (if a station demands carriage on a cable channel on which it is not entitled to carriage, it is not improper for the cable operator to unilaterally assign the station to a cable channel of the operator's choosing).

Should you decide to file a must-carry complaint with the FCC notwithstanding the foregoing, TWC reserves the right to pursue all appropriate remedies.

Sincerely,

Andrew Rosenberg

[3] *See* Letter to Counsel, DA 15-1028 (rel. June 5, 2015).

EXHIBIT 3

September 18, 2014 Mandatory Carriage Election

KVNV DTV3
Middletown, NJ

September 18, 2014

Via Certified Mail, Return Receipt Requested

Time Warner Cable
13820 Sunrise Valley Drive
Herndon, VA 20171

Re: Mandatory Carriage Election for KVNV, Middletown Township, NJ

Dear Sir or Madam:

Pursuant to Section 614 of the Communications Act of 1934, as amended, and Section 76.64 of the rules of the Federal Communications Commission ("FCC"), this will inform you that PMCM TV, LLC, the licensee of Television Station KVNV, Middletown Twp., New Jersey (the "Station") hereby elects mandatory carriage of the Station's television signal pursuant to Section 76.56(b) on all cable systems operated by **Time Warner Cable** or its subsidiaries and affiliates serving the New York, New York Designated Market Area ("DMA") for the election period starting January 1, 2015 and ending December 31, 2017. The Station is licensed to Middletown Twp., New Jersey, which is located in Monmouth County, New Jersey, with transmission facilities at 4 Times Square in New York City. Middletown Township is a part of the New York, New York DMA. The Station therefore is entitled to elect mandatory carriage on your system(s) under the rules of the FCC.

Pursuant to Section 76.57(a) of FCC's rules and the statutory mandate for on channel carriage in the Cable Act of 1992, KVNV elects to be carried on channel number 3, the Station's over-the-air RF channel number. The Station, which will be broadcasting in 720p High Definition, is also respectfully requesting the Station be simultaneously carried on the same corresponding number on the HD tier as is normally afforded other local broadcasters who have chosen on channel carriage.

Please note, the Station will be changing call letters before year end as it commences operations in New Jersey. The new calls will be WJLP DTV 3.

The Station's contact person and address for purposes of receiving official correspondence is as follows:

KVNV DTV 3 Middletown, NJ
1329 Campus Parkway
Neptune, New Jersey 07753
Attention: Lee Leddy
Office# (732) 403-3875
Email: lbleddy@gmail.com

Please contact Mr. Leddy or myself if you should have any questions concerning this matter.

Sincerely,

Robert Mc Allan

Robert Mc Allan,
Managing Member, PMCM TV LLC
Cell: (908) 433-0490 or 908-433-8272
bob@RMcAllan.com

CERTIFICATE OF SERVICE

I, Sandi Kempton, hereby certify that on this 19th day of January 2016, I caused a copy of the foregoing "Must Carry Complaint" to be served via U.S. mail, postage prepaid, upon the following:

RCN Telecom Services, LLC 650 College Road East Princeton, NJ 08540 Attn: Ms. Deborah A. Rankin	Time Warner Cable 60 Columbus Circle New York, NY 10023 Attn: Mr. Andrew Rosenberg
Service Electric Cable TV of New Jersey Inc., d/b/a/ Service Electric Broadband Cable 320 Sparta Avenue Sparta, NJ 07871 Attn: Robert Williams, Jr., General Counsel	Mobius Legal Group, PLLC P.O. Box 6104 Springfield, VA 22150 Attn: James E. Dunstan *Counsel to SECTV-NJ*
Cablevision Systems Corporation 1111 Stewart Avenue Bethpage, NY 11714 Attn: Mr. Tom Montemagno, EVP, Programming	Verizon, Inc. 1300 I Street, NW Washington, DC 20005
Comcast Cable Communications, LLC One Comcast Center Philadelphia, PA 19103 Attn: Mr. Michael Nissenblatt	Advanced Broadband, L.P. 4636 Street Rd., Trevose, PA 19053
Blue Ridge Cable Technologies, Inc. 613 Third Street P.O. Box 215 Palmerton, PA 18071	Charter Communications Entertainment I LLC 12405 Powerscourt Drive St. Louis, MO 63131
Hometown Online Inc. 47 Main Street Warwick, NJ 10990	Hovbilt Inc. Suite 12 Village Mall Freehold, NJ 07728
Service Electric Cable TV, Inc. 1045 Hamilton Street Allentown, PA 18101	Sky Satellite Corp. 258 Glen St. Glen Cove, NY 11542
DISH Network, L.L.C. 9601 S. Meridian Blvd. Englewood, CO 80112	DIRECTV, Inc. 2260 E. Imperial Hwy El Segundo, CA 90245
State of Connecticut Dept. of Energy and Environmental Protection Public Utilities Regulatory Authority Ten Franklin Square New Britain, CT 06051	New York State Department of Public Service Cable TV Franchise Authority 3 Empire State Plaza Albany, NY 12223 Attn: Office of the Secretary

New Jersey Board of Public Utilities Office of Cable Television 44 S. Clinton Avenue P.O. Box 350 Trenton, NJ 08625	American Broadcasting Companies Inc. 77 West 66th St., 16th floor New York, NY 10023
CBS Broadcasting Inc. 2175 K Street, NW, Ste. 350 Washington, DC 20037	NBC Telemundo License LLC 1299 Pennsylvania Ave NW, 9th Floor Washington, DC 20004
Fox Television Stations Inc. 400 North Capital Street, Ste. 890 Washington, DC 20001	WPIX, LLC 220 East 42nd St. New York, NY 10017
ION Media License Co., LLC 601 Clearwater Park Rd. West Palm Beach, FL 33401	Trinity Broadcasting Network of New York, Inc. 111 East 15th St. New York, NY 10003
Univision New York, LLC 5999 Center Drive Ste. 4083 Los Angeles, CA 90045	CBS LITV, LLC 1800 K St., NW, Ste. 920 Washington, DC 20006
WRNN License Co., LLC 800 Westchester Ave., Ste. S-640 Rye Brook, NY 10573	Mountain Broadcasting Corp. 99 Clinton Rd. West Caldwell, NJ 07006
WXTV License Partnership GP 5999 Center Dr., Ste. 4083 Los Angeles, CA 90045	NRJ TV NY License Co., LLC 722 South Denton Tap Rd., Ste. 130 Coppell, TX 75019
WNET 825 8th Avenue New York, NY 10019	