

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )  
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)  
United Communications Corporation )  
KEYC-TV (Fac. ID No. 68853) ) CSR- \_\_\_\_\_  
Mankato, Minnesota )  
)  
Petition for Waiver of Sections 76.92(f) )  
and 76.106(a) of the Commission's Rules )  
)  
To: Chief, Media Bureau )

**PETITION FOR SPECIAL RELIEF**

Barry D. Wood  
Ronald D. Maines  
WOOD, MARTIN & HARDY, P.C.  
3300 Fairfax Drive, Suite 202  
Arlington, Virginia 22201  
(703) 465-2361

Its counsel

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## SUMMARY

From the beginning of FCC regulation of the television industry, the agency has recognized the value of the local service that stations provide. Toward that end, the FCC long ago developed rules to support the territorial exclusivity with regard to syndicated and network programming that is the lifeblood of small market stations. Exceptions to the syndicated exclusivity and network non-duplication rules permit cable operators to import the signals of distant stations where they are deemed “significantly viewed.” However, the FCC will undo significantly-viewed status that is unfounded. In this Petition, KEYC-TV asks that the Commission correct the status of four out-of-market television stations with respect to the Minnesota communities shown in the table below.

<b>Station</b>	<b>Communities</b>	<b>Station</b>	<b>Communities</b>	<b>Station</b>	<b>Communities</b>
WCCO-TV	Mankato	KAAL	Mankato	WFTC	North Mankato
	North Mankato		North Mankato		Good Thunder
	Amboy		Amboy	KMSP-TV	Mankato
	Good Thunder		Good Thunder		North Mankato
	Madelia		Lake Crystal		Good Thunder
	Hanska		Madison Lake		New Ulm
			Madelia		
			St. James		
			Hanska		
			Sleepy Eye		
			Springfield		
			New Ulm		

In each of these cases, the viewing levels required for distant stations to maintain significantly viewed status are no longer present. The evidence supporting this conclusion is presented according to the methodology and in terms of the statistical parameters prescribed by the Commission for this purpose, in data gleaned and summarized by The Nielsen Company.

This showing removes any basis for continuing to allow the signals of the distant stations to be imported into KEYC-TV’s market. The grant of this Petition will thus allow KEYC-TV to receive the benefit of the exclusivity rights that it has bargained for.

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**PETITION FOR SPECIAL RELIEF**

For almost four decades, United Communications Corporation (“UCC” or “United”) has been the licensee of broadcast station KEYC-TV, Mankato, Minnesota. KEYC-TV is the only television station operating in the Mankato market. It is therefore the only source for local television news, events, issues, weather and emergency information. It has been a quintessentially ‘local’ presence – an anchor steward of the local public interest – for more than fifty years in this very small market, ranked 199 out of 210 by Nielsen.

The Commission has established a salutary system to support the viability of small market stations and thus help them serve their communities. This system includes the network non-duplication and territorial syndicated exclusivity rules. Unfortunately, KEYC-TV’s ability to serve Mankato and the surrounding rural area has been perennially undercut by operation of the “significantly-viewed” exception to these rules. This has allowed stations from distant markets to deliver the same network and syndicated programming to Mankato-area residents via cable television and satellite that KEYC-TV itself supplies. Consequently, KEYC-TV’s audience has been severely diluted in its own back yard. In the

main, the distant signals originate in the Minneapolis-St. Paul Designated Market Area (“DMA”). This is the 15th largest DMA in the country in terms of population.

With changed viewing patterns, the empirical basis for the significantly-viewed status originally accorded several of those stations has eroded. In particular, the out-of-market television stations (the “Distant Stations”) identified in Section II no longer have the viewing levels in non-cable, non-ADS homes that are required in order to be deemed ‘significantly-viewed’ in the communities identified herein (the “Relevant Communities”). No other regulatory grounds exempt the distant signals from deletion.

Because there are no longer obstacles to United’s asserting its exclusivity rights in the Relevant Communities, the Commission should waive the exceptions that have allowed the signals of the Distant Stations to be imported<sup>1</sup> into KEYC-TV’s market.<sup>2</sup>

## **I. Regulatory Framework**

1. *The Localism Core.* Television stations are ‘local’ enterprises, but not in the way the corner grocery is local. The character of a television broadcast enterprise is determined by regulatory, demographic, market, engineering and other forces that render it a unique business type. In the broadcast context, ‘local’ does not denote a point on a map but a kind of ordering principle – Localism – which strongly orients television broadcasters to their communities. By statute and FCC regulation, television broadcasters do not have ownership of their

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<sup>1</sup> The Rules cited in the caption – 47 C.F.R. §§ 76.92(f) and 76.106(a) – pertain to the significantly-viewed exception to cable network non-duplication and syndicated exclusivity. The grounds for waiving those Rules also apply to a waiver of 47 C.F.R. §§76.122(j) and 76.123(k) relating to carriage on satellite systems serving subscribers in KEYC-TV’s DMA. *Id.*, see also 47 U.S.C. §§340(a)(2) and 340(c).

<sup>2</sup> A station’s market for this purpose is its Designated Market Area as defined by The Nielsen Company. A DMA is a geographic market designation that defines each television market exclusive of others, based on measured viewing patterns. Essentially, each county in the United States is allocated to a market based on which home-market stations receive a preponderance of total viewing hours in the county.

principal asset, but instead serve as trustees. Use of the spectrum licensed to them entails obligations of responsiveness to the unique interests and needs of the particular communities they serve.

The FCC's technical rules define the contour and intensity of a television station's viewable signal, thereby delimiting a broadcaster's primary local service area. Territorial exclusivity rules restrict the local geography in which a television station can secure exclusive program distribution rights. Ownership rules proscribe in general the ownership or control of more than one television station licensed in the same market area. The main studio rule establishes a further ground of connectedness to the local community, as does the requirement to document programming that responds to community needs.

The ultimate piece in a jigsaw puzzle achieves the puzzle's purpose precisely because its shape is ordained by the pattern of surrounding pieces. Just so, the tightly dimensionalized Localism model supports the promised potential of local television. Broadcasters who magnify the Localism Core achieve deep instantiation in their communities. Year after year, generation after generation, they are 'there' in the fabric of lived experience. Their presence and voice in the community are constants, contributing in unique ways to the rhythms of day to day life. Television stations motivated by Localism are trusted, looked-to, and counted-on by residents of the community. This stewardship orientation generates a kind of heightened intelligence: Broadcasters who embrace their role as stewards have greater perspicuity and discernment concerning the interests and needs of the local community because local states of affairs are of genuine concern to them, and that concern is reflected in their stations' programming.

United is a sterling example of an FCC licensee that embodies these qualities. Since 1961, KEYC-TV has magnified United's corporate mission to "Enrich the local communities." Nearly three hours of local programming in high definition (mostly local news) is produced each weekday. For example, residents of south central Minnesota and north central Iowa rely heavily on KEYC-TV for

severe weather information – blizzards, tornados, floods, high winds and rain storms.

The station has invested heavily in state-of-the-art weather technology. It employs one part-time meteorologist and three fulltime staff meteorologists. KEYC-TV was honored in 2014 by the Board of Directors of the Association of Minnesota Emergency Managers for a series of public service announcements produced and aired by the station to teach Minnesota residents what to do in emergencies. These announcements were included on the Homeland Security and Emergency Management website.

KEYC-TV has electronic news-gathering equipment that it uses to produce programs of local interest no matter where they occur within the service area. Thus, for instance, earlier this week KEYC-TV covered the Iowa Presidential caucuses on site in northern Iowa communities that are within its service area. In addition, just yesterday KEYC-TV's mobile news unit was on the scene of a horrific fire in Madelia, Minnesota that destroyed a major part of that town's business district, provided live coverage of this disaster. KEYC-TV will also be leading fundraising efforts to assist victims of the conflagration.

Even though the Mankato area is home to an important institution of higher learning, it has no local public television station. On the prairie to the west and southwest of Mankato is a host of television translator stations, almost all of them licensed to a local electric utility, the BENCO Electric Cooperative. But these stations originate no local programming whatsoever. Instead, they merely import into KEYC-TV's service area a plethora of distant signals from the Twin Cities and other distant markets, including affiliates of the CBS and Fox affiliates from the Twin Cities. To the extent that any off-air viewing of stations from the Twin Cities is recorded in the Relevant Communities, it more than likely stems from viewership of such stations as rebroadcast by these translators.

Accordingly, we reiterate that KEYC-TV is the only local television station in south-central Minnesota. No other television licensee produces or broadcasts any substantial amount of local news programming for this region.

2. *The Television Business Model.* Every business model is implicitly an account of projected human interactions. Fundamental to local television's stewardship model is the *resonance* of audience and station. The model's effectiveness depends not only on a television broadcaster's patterns of action over time, but on reciprocal patterns of local audience response based on their perception of the broadcaster's brand identity among a variety of media alternatives. This dynamic directly affects a station's ability to generate revenue. Unlike cable, satellite, and other vendors of video programming, the television model is not subscription-based. Instead, television station revenue is largely a function of the sale of advertising time. The advertising rates that a station can charge are wholly dependent on viewership. Viewership depends on the quality and appeal of programming. Therefore, programming and the audience shares that such programming can attract are integral to the Localism model.

Small market stations, and KEYC-TV in particular, often achieve extremely high audience shares for their local news and sports programming. However, in general, the most-watched *entertainment* programs owe their provenance to television networks and non-network program syndicators.<sup>3</sup> When broadcasters acquire from those sources the right to provide network and syndicated programs, they typically negotiate contracts for their *exclusive* distribution in their markets. This contractual exclusivity follows logically from the stewardship model. A station's prospect of establishing a reliable identity depends importantly on the uniqueness that exclusive contractual relationships contemplate. Stations obtain the right to exhibit network programs by offering to the network attractive audience circulation, and by giving up to the network all of the advertising time within those programs, and therefore the bulk of the advertising revenue from the airing of those programs. The local stations are left

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<sup>3</sup> A network program is "any program delivered simultaneously to more than one broadcast station, regional or national, commercial or non-commercial." 47 C.F.R. §76.5(m). A syndicated program is "any program sold, licensed, distributed, or offered to television station licensees in more than one market within the United States other than as network programming as defined in §76.5(m)." 47 C.F.R. §76.5(ii).

to do the best they can with sales of spot time adjacent to the network programs. In addition, they must pay the networks increasingly steep “programming fees.” In light of the extremely high costs that stations pay for such programming, it is only fair that they be able to receive the benefits of the local exclusivity that is the essence of the network-affiliate relationship.

Likewise, non-network program suppliers grant stations exclusive rights based on the principle that duplication within a station’s market would reduce the audience for such programming, and hence the value of the programming to the station. In addition, the value of any “barter” time in a syndicated program to the syndicator is reduced to the extent that the audience of the local station carrying such a program is fractured.

Through these dynamics, the stewardship model is inextricably connected with each station’s operational economics. In other words, without program exclusivity, small market stations like KEYC-TV could not afford to pay the salaries of those who produce their local news and weather programs. The existing level of exclusivity is what has allowed KEYC-TV to survive. To the extent that program exclusivity protections can be strengthened to the levels contemplated by the Commission’s rules, stations like KEYC-TV will have added resources with which to improve their local public service programming.

3. *Exclusivity Protection.* The major threat to exclusive distribution comes from cable and satellite companies who frequently import the same desirable network programs and syndicated programs from stations in distant markets. This undermines the exclusivity for which the local station has bargained. The Commission’s network non-duplication and syndicated exclusivity rules are designed to defend against this result.

The network non-duplication rules protect a local television station’s right to be the exclusive distributor of network programming within a specified zone, and require programming subject to the rules to be blacked out on request when carried on another station’s signal imported by a cable operator into the local

station's zone of protection.<sup>4</sup> A television station's rights are governed by the contractual agreement between the station and the holder of the rights to the program. The rules allow stations to protect the exclusive distribution rights they negotiate with broadcast networks, not to exceed a geographic zone of 35 miles or 55 miles for network programming in smaller markets such as Mankato.<sup>5</sup> The syndicated exclusivity rules allow a station to protect exclusive distribution rights within a 35-mile zone surrounding the station's city of license.

4. *Two Primary Exceptions.* There are, however, limited circumstances in which an out-of-market signal otherwise subject to deletion may avoid deletion. The two primary exceptions relate to the level of a distant station's viewership in given cable communities (the Significantly-viewed Exception) or the location of those communities *vis a vis* a distant station's service contour (the Service Contour Exception).<sup>6</sup>

A. *The Significantly-viewed Exception.* Under 47 C.F.R. §§76.92(f) and 76.106(a), a cable operator is not required to delete the duplicated network or syndicated programs of distant stations whose level of viewership has been determined by the FCC to be "significant." This is an empirical characterization.<sup>7</sup> Network affiliated stations are considered significantly viewed if – according to audience surveys satisfying the methodological criteria set forth in the Rules – the survey results show more than a 3 percent share of total viewing hours and a net

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<sup>4</sup> See 47 C.F.R. §§76.92 and 76.122.

<sup>5</sup> See 47 C.F.R. §§76.92 and 76.120.

<sup>6</sup> Other exceptions include low subscriber level for cable systems, *see* 47 C.F.R. §76.95(a) and 76.106(b) (relating to network non-duplication and syndicated exclusivity, respectively); and 47 C.F.R. §76.92(e) (cable operator in local station secondary zone and within 55 miles of Distant Station).

<sup>7</sup> Section 340(c)(2) of the Communications Act requires that the Commission's website host a current list of all significantly viewed stations. This list consists of the 1972 list, as amended over time via additions of stations newly found to be significantly viewed, as well as by the removal of stations determined to be no longer significantly viewed in specific communities through case by case determinations.

weekly circulation of 25 percent, by at least one standard error. Independent stations (*i.e.*, non-network stations) are considered significantly viewed if the survey results show more than a 2 percent share of total viewing hours and a net weekly circulation of 5 percent, by at least one standard error. 47 C.F.R. §§76.5(i) and 76.54(b).

Because the nature of the showing is statistical, there are several considerations that help to control its proper interpretation in a given case:

- ◆ For most television stations, significantly-viewed status derives from audience surveys that were conducted over forty years ago, in 1970-71. *See Amendment of Part 74, Subpart K, of the Commission's Rules and Regulations Relative to Community Antenna Television Systems, Memorandum Opinion and Order on Reconsideration*, 36 FCC 2d 326 (1972). At that time there was no efficient way for community-specific data of viewing patterns to be obtained. That is why the Significantly Viewed List was county-based rather than community-specific. The Commission acknowledged in the 1972 Order that there likely were particular communities in which the criteria would *not* have been met, but that expeditiously settling the uncertainty surrounding the larger issue warranted moving forward with the Significantly Viewed List as it then stood. *See, e.g., KOIN-TV, Inc.*, 93 FCC 2d 186 (1983).
- ◆ The original survey of significant viewing included over-the-air viewing via *translators*, because it would have been cumbersome for the ratings services to sort out which viewing resulted from viewing of a signal obtained via a translator as opposed to viewing of the parent station's signal directly off air. In subsequent years, on occasion a television licensee has sought to be added to the Significantly Viewed List and has predicated its statistical showing on data that included translator coverage, urging this should be accepted because viewership from translators had been part of the Commission's original survey. The FCC repeatedly has rejected this claim. *See, e.g., Scranton Broadcasters, Inc.*, 88 FCC 2d 1482 (1982); *KOIN-TV, Inc., supra*; *Taft Television and Radio Company, Inc.*, 103 FCC 2d 883 (1986).
- ◆ A logical premise of any argument that over-the-air viewing in a given community is 'significant' is that in the first instance reception of a viewable signal over-the-air in that community is technically plausible. This precept derives from the Court of Appeals action in *KCST-TV, Inc.*<sup>8</sup> There, the Court set aside the Commission's denial of a request for waiver of the significantly viewed rule. At the time, the FCC's approach to waiver requests required a petitioner to demonstrate that application of the rule was causing economic

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<sup>8</sup> 699 F.2d 1185 D.C.Cir.(1983).

harm to the petitioning station. Absent such a showing, the Commission declined to consider evidence that the distant station was not, *in fact*, significantly viewed. The Court viewed this approach as a violation of logic and arbitrary by definition. It therefore set aside the FCC's action.

These considerations are noteworthy because they help to ensure that a determination whether significant viewing status in a particular case is warranted will be objectively correct. They give deeper evidential grounding to conclusions that should be empirically sound. Moreover, they magnify the visibility of error in cases where a tool of analysis, including the seemingly cut-and-dried methodology of a statistical assessment, is used in too narrow a fashion. Among other benefits, they minimize the possibility that a significant viewing decision will be arbitrary or irrational.

\* \* \*

If a station once deemed significantly viewed is shown no longer to have this level of viewership, in a particular community, the station's significantly viewed status is waived and the Localism principles which motivate the exclusivity rules are reactivated.

As demonstrated in Section II, this is the case with respect to the Distant Stations and the Relevant Communities.

B. *Service Contour Exception*. Under 47 C.F.R. §76.106(a) – with respect to syndicated exclusivity only – a distant signal is not required to be deleted where the "cable community unit falls, in whole or in part" within the distant station's "Grade B" contour. Following the digital conversion deadline, the Commission has treated a digital television station's noise-limited service contour as equivalent to the Grade B contour referenced in the Rule's text. *See Estes Broadcasting, Inc.*, 25 FCC Rcd 7956, 7956 n. 2 (MB 2010).

A review of the service contours of the Distant Stations (accessible on the on-line public files of each of the Distant Stations on [fcc.gov](http://fcc.gov)) confirms that the

Service Contour Exception is not in play here. None of the Distant Stations places a predicted noise-limited contour over any of the Relevant Communities.

## **II. The Significantly-viewed Exception No Longer Applies with Respect to the Distant Stations in the Relevant Communities.**

The thrust of a legal showing that significantly-viewed status should be waived consists mainly in a statistical evaluation of viewership levels of out-of-market stations in the subject communities. We will address this element in Paragraphs B and C of this section. Preliminarily, United affirms that the following threshold requirements have been met:

### **A. Threshold Requirements**

1. *Protected Zones.* Because KEYC-TV is a smaller market facility, its zone to enforce network program exclusivity extends 55 miles from the station's reference point coordinates. Its protected zone for syndicated programs has a radius of 35 miles. The Relevant Communities are within these ranges.

2. *Contractual Rights.* United has network affiliation agreements (1) with the CBS Television Network authorizing carriage of CBS network programming on KEYC-TV and (2) with the Fox Network authorizing carriage of Fox programming on KEYC-TV's multicast stream.<sup>9</sup> In each case, the contract includes a grant of network non-duplication rights to the maximum extent permitted by the FCC's Rules. United is also a party to programming agreements with various providers of syndicated programming. These contracts likewise grant the maximal exclusivity allowed by the Rules.

3. *Notice to Affected Parties.* United timely notified interested parties pursuant to the requirements of 47 C.F.R. §76.54(c) of its planned acquisition of the Nielsen data that support this Petition.

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<sup>9</sup> “[S]tations may affiliate their multicast streams with established networks to give viewers in smaller markets more over-the-air viewing options,” *In the Matter of Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming* (MM Docket No. 14-16), FCC 15-41, rel. April 2, 2015, at ¶142.

4. *Significantly-Viewed Status.* The Mankato DMA consists of Blue Earth, Brown, Martin and Watonwan Counties, Minnesota, and the southern portion of Nicollet County, Minnesota (principally including the City of North Mankato). As to the inclusion of southern Nicollet County in the DMA, see Nielsen “*Measurements and Reporting Geographies,*” at page 1.9 (2007), reproduced at <http://apps.fcc.gov/ecfs/document/view;jsessionid=Ln1gT11DVjSXjLxdsyQV3v2Xb51M2sZGgFMphQ20TtP7LQb0Dcvf!1281169505!1675925>.

The Distant Stations are included in the Significantly Viewed List for most of these counties as it appears on the FCC’s website. The exception is that station KMSB-TV does not appear on the Significantly Viewed List for Watonwan County. All of the Relevant Communities are located within KEYC-TV’s DMA.

**B. Statistical Showing**

1. *Elements of Valid Statistical Showing.* In order to obtain a waiver of the significantly viewed exception to the exclusivity rules, a petitioner is required to show that, for two consecutive years, an out of market station has failed to obtain a 3 percent share of total viewing hours and a net weekly circulation of 25 percent, by at least one standard error (or for an independent station, a 2 percent share of total viewing hours and a net weekly circulation of 5 percent, by at least one standard error).

Section 76.54(b) of the Rules requires that showings for this purpose be based on an independent professional audience survey. The Nielsen Company, which routinely surveys television markets to obtain television station viewership, conducts four-week audience surveys four times a year (the February, May, July, and November “sweep periods”). Petitioners who wish to demonstrate a lapse in significant viewing levels may submit the Nielsen results from two sweep periods in each year, one of which must be outside the months of April through September.<sup>10</sup>

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<sup>10</sup> The use of an audience sweeps period is equivalent to the one-week period set forth in Section 76.54(b) of the rules.” *KSTC-TV, LLC* (Order on Reconsideration), DA 10-1151, rel. June 24, 2010 (MB), at n. 35.

2. *Two Consecutive Years.* The Commission requires that two separate surveys be performed in consecutive years. The provisions of Section 76.54(b) therefore apply to each year's survey. Within a given year, a petitioner may submit the average of two sweep periods.

3. *Nielsen's Use of Zip Codes.* Nielsen's methodology in this context relies on zip codes, which appear under the category "geographical grouping" in Nielsen's reports.<sup>11</sup> Zip codes and community names are not synchronized unilaterally by Nielsen. Rather, it uses the zip codes provided by the petitioning television station when Nielsen is engaged to generate a report. The FCC approves of Nielsen's sample-selection "identifying the communities by zip codes" as an aspect of "sound statistical techniques" and "consistent with surveys found acceptable." *Silverton Broadcasting Company, LLC* (Memorandum Opinion and Order), DA 15-741, rel. June 25, 2015 (MB), at ¶5.

A zip code is a U.S Postal Service designation that serves primarily a logistics function for local mail delivery. To guide the timely and accurate delivery of mail even when senders have been imprecise about the appropriate zip code to use, the Postal Service builds redundancy into its zip code schema. A single zip code might be associated with an area that covers more than one community, and some communities are assigned more than one zip code. Because Nielsen relies exclusively on zip codes to identify communities, ambiguity can arise in the interpretation of Nielsen studies in the context of waiver showings. Here again, the Commission's approach is reasonably pragmatic and takes notice of clarifying contextual information.

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<sup>11</sup> Zip codes "have generally been found to be a good method for identifying cable communities of interest for the purpose of Nielsen's re-tabulations of its existing data." *Gray Television Licensee, LLC*, Memorandum Opinion and Order, DA 15-257, rel. Feb. 25, 2015 (MB), at ¶20.

In this instance, the only clarifications necessary are noted in the tables below. Otherwise, each Relevant Community is associated with only one zip code, and each zip code ‘input’ returns a single community name.<sup>12</sup>

4. ‘*Community.*’ Community-specific petitions for waiver of significantly viewed status require not only that correlations between zip codes and community names are valid, but also that a community name refers to a “cable television community.”<sup>13</sup> Under Section 76.5(dd) of the Rules, a community unit is “[a] cable television system, or portion of a cable television system, that operates or will operate within a separate and distinct community or municipal entity (including unincorporated communities within unincorporated areas and including single, discrete unincorporated areas).” This ‘community or municipal entity’ is associated with a Community Unit Identifier Number (CUID) at the time the cable unit is registered with the FCC.<sup>14</sup> This data is retrievable through the Commission’s COALS database.

Summarizing Points 3 and 4: Valid waiver showings require correlations over zip code, community, and cable “community unit.” The most straightforward of these patterns are reflexive 1:1 mappings of the form:

Zip Code ↔ Community ↔ Cable Unit ID(s),

where the bidirectional arrows indicate that the zip code and community name are associated uniquely with each other and the community name and CUID(s) are likewise uniquely associated. The ambiguity alluded to in Point 3 above can be magnified because cable franchise areas are generally defined by the jurisdictional boundaries of the community awarding the franchise. In combination, these factors occasionally make difficult the correlation of zip code, community, and

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<sup>12</sup> In addition, some zip codes are associated only with specific post office boxes or with a specific business entity or organization, rather than households. These are properly ignored for the purpose of significantly-viewed analyses. See *TVL Broadcasting of Rhode Island, LLC* (Memorandum Opinion and Order), DA 13-2150, rel. Nov. 8, 2013 (MB), at n. 89.

<sup>13</sup> 47 C.F.R. §76.54(b).

<sup>14</sup> 47 C.F.R. §76.1801.

cable operation data upon which waiver showings are predicated. The Commission recognizes, however, that there is not always perfect synchrony on this score, given the different purposes for which these classifications originally were created. In those instances, a common sense approach considering the relevant evidence is required to reach a conclusion that is pragmatically appropriate.

5. *Sample Size.* Generally, the FCC gives “much leeway” with respect to the size of the survey samples studied by Nielsen because “the standard error takes [it] into account when the variability of the estimate is calculated.”<sup>15</sup> The standard error creates a confidence interval around the reported statistic. For this reason the Commission frequently grants waivers of the Significantly-viewed Exception based on as few as two Nielsen in-tab households.<sup>16</sup> In the present case this threshold has been met and in most instances far exceeded, as the data in the tables reflect.

6. *Network Stations.* Network stations are television stations “owned or operated by, or affiliated with,<sup>17</sup> one or more of the television networks in the United States which offer an interconnected program service on a regular basis for 15 or more hours per week to at least 25 affiliated television licensees in 10 or more States.” 47 C.F.R. §73.3613(a)(1). At present, the FCC classifies NBC, CBS, ABC and Fox as “the four major networks.” *Annual Assessment of the*

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<sup>15</sup> *KSTC-TV, LLC* (Order on Reconsideration), DA 10-1151, rel. June 24, 2010 (Media Bureau), at ¶ 13.

<sup>16</sup> See, e.g., *WPBF-TV Company*, 25 FCC Rcd 9102, 9105 ¶6 (MB 2010); *Tribune Television Company*, 24 FCC Rcd 1622, 1625 ¶6 (MB 2009); see also, *Delmarva Broadcast Service General Partnership*, 14 FCC Rcd 10509 (1999) (“[S]ince significantly viewed status is a measure of the viewing patterns of noncable homes, the required calculation of standard error and its use along with the sample results assures that the survey results are representative of actual viewing levels in noncable homes and are not unreasonably skewed by any small sample size”).

<sup>17</sup> See *In the Matter of Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming* (MM Docket No. 14-16), FCC 15-41, rel. April 2, 2015, at n. 562 (“Stations affiliated with a network may be owned and operated by the network (O&Os) or owned by other entities that have agreements with a network for distribution of the network’s programming”).

*Status of Competition in the Market for the Delivery of Video Programming* (MB Docket No. 14-16), FCC 15-41, rel. April 2, 2015, at ¶¶146-147; *see also*, *In-State Broadcast Programming: Report to Congress* (MB Docket No. 10-238), rel. Aug. 29, 2011, at ¶ 35 and n. 115.

**C. Results of the Nielsen Study**

Data in the Nielsen Study were compiled based on the Nielsen Station Index survey conducted over four-week periods during February and November 2013 and February and May 2014. The relevant portion of the report, along with Nielsen's methodology statement, are Exhibit 1 hereto. The pertinent results are set out in the tables below. They show that with respect to the Distant Stations and Relevant Communities described, significant viewing no longer holds.

*Reading the Tables.* This waiver request involves four Distant Stations carried on cable systems in various communities throughout the service area of KEYC-TV. For each of these the Call Sign, Facility ID, network affiliation (if any), and DMA are shown in headings preceding the four groupings.

As proof that the various Distant Stations are no longer significantly-viewed in each Relevant Community, figures for the Share and the Cume (with the standard error added in each case) are presented. Those sums appear in the 'Effective Share' and 'Effective Cume' columns in the tables. The 'Thresholds' column indicates the relevant Share/Cume levels, depending on whether the facility is a network or independent station (3/25 or 2/5, respectively). The words 'Yes' or 'No' indicate whether, as to each statistic, the threshold for significantly-viewed status has been met.

The 'order of operations' for deriving a conclusion with respect to each table is as follows: For the Survey Period in the first row, if the outcome in the Thresholds column indicates either one or two 'No' answers, then the station has failed the significantly-viewed test for that period, and the analysis moves to the second row's Survey Period. If the Thresholds column again indicates either one or two 'No' answers, the Distant Station has failed the test for the second year. Having failed the significantly-viewed test for two consecutive years, the

particular Distant Station no longer meets the criteria for the Significantly-viewed Exception in the subject community.

Below each table the required correlation of zip code, community and cable unit (Zip Code ↔ Community ↔ Cable Unit ID) is shown and any ambiguity is resolved.

WCCO-TV – CBS affiliate  
 Facility ID: 9629  
 Minneapolis-St. Paul DMA

**Table 1 – WCCO-TV Viewing in Mankato (zip code 56001)<sup>18</sup>**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds	
						3	25
Feb/Nov 2013	22	[1.86] + [1.71]	3.57	[2.79] + [2.90]	5.69	Yes	No
Feb/May 2014	23	[.88] + [.88]	1.76	[4.04] + [4.25]	8.29	No	No

**Table 2 – WCCO-TV Viewing in North Mankato (zip code 56003)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds	
						3	25
Feb/Nov 2013	10	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No	No
Feb/May 2014	4	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No	No

Concerning the Zip Code ↔ Community ↔ CUID(s) correlations: Mankato and North Mankato are legally distinct communities separated by the Minnesota River and served by cable operations identified by distinct CUIDs. On the USPS website, the zip code input ‘56001’ is associated only with the city name Mankato. However, the input ‘Mankato’ returns 56001 and 56003. Conversely, the zip code input ‘56003’ returns the

<sup>18</sup> Additional zip codes included by Nielsen in the Mankato and North Mankato studies were 56002 and 56006. These are associated with unique post office boxes or particular business entities, rather than households, and are therefore excluded from the instant showing. *Supra*, n. 11.

city names Mankato and North Mankato; and the input ‘North Mankato’ returns zip code 56003. Because the city names and the zip codes do not precisely coincide, it is necessary to rule out the possibility of double-counting. That is, it is necessary to ensure that, as to the Mankato-specific waiver showing, no surveys from ‘North Mankato’ are being counted; and as to the North Mankato-specific waiver showing, no surveys from ‘Mankato’ are being counted. This can be done by showing that the area enclosed by the 56001 Nielsen “geography grouping” does not include any of North Mankato and the area enclosed by the 56003 geography grouping does not include any of Mankato, as in Exhibit 2. It can therefore confidently be concluded that the ‘community-specific’ significantly-viewed analysis for Mankato is not threatened by a double-counting error. The same is true of the ‘community-specific’ significantly-viewed analysis for North Mankato. Thus:

Zip Code ↔ Community ↔ CUID(s)
56001 ↔ Mankato ↔ MN0002, MN0285
56003 ↔ North Mankato ↔ MN1241, MN1255

**Table 3 – WCCO-TV Viewing in Amboy (zip code 56010)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	2	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	2	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID
56010 ↔ Amboy ↔ MN1266

**Table 4 – WCCO-TV Viewing in Good Thunder (zip code 56037)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	3	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	7	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID
56037 ↔ Good Thunder ↔ MN1275

**Table 5 – WCCO-TV Viewing in Madelia (zip code 56062)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds	
						3	25
Feb/Nov 2013	4	[1.05] + [1.17]	2.22	[16.0] + [16.64]	32.64	No	Yes
Feb/May 2014	6	[1.17] + [0.87]	2.04	[24.6] + [17.67]	42.27	No	Yes

Zip Code ↔ Community ↔ CUID
56062 ↔ Madelia ↔ MN0336

**Table 6 – WCCO-TV Viewing in Hanska (zip code 56041)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds	
						3	25
Feb/Nov 2013	4	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No	No
Feb/May 2014	2	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No	No

Zip Code ↔ Community ↔ CUID
56041 ↔ Hanska ↔ MN1189

KAAL – ABC affiliate Facility ID: 18285 Austin /Albert Lea / Rochester, MN – Mason City, Iowa DMA
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**Table 7 – KAAL Viewing in Mankato (zip code 56001)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds	
						3	25
Feb/Nov 2013	22	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No	No

Feb/May 2014	23	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
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**Table 8 – KAAL Viewing in North Mankato (zip code 56003)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	10	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	4	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Concerning the Zip Code ↔ Community ↔ CUID(s) correlations for Mankato and North Mankato, see the discussion following Tables 1 and 2.

**Table 9 – KAAL Viewing in Amboy (zip code 56010)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	2	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	2	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID
56010 ↔ Amboy ↔ MN1266

**Table 10 – KAAL Viewing in Good Thunder (zip code 56037)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	3	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	7	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID
56037 ↔ Good Thunder ↔ MN1275

**Table 11 – KAAL Viewing in Lake Crystal (zip code 56055)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	6	[.57] + [.69]	1.26	[25.0] + [0.00]	25.00	No   Yes
Feb/May 2014	3	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID(s)
56055 ↔ Lake Crystal ↔ MN0088, MN1228

**Table 12 – KAAL Viewing in Madison Lake (zip code 56063)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	5	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	2	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID(s)
56063 ↔ Madison Lake ↔ MN0623, MN1276

**Table 13 – KAAL Viewing in Madelia (zip code 56062)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	4	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	6	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID
56062 ↔ Madelia ↔ MN0336

**Table 14** – KAAL Viewing in **St. James** (zip code **56081**)

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	8	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	11	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID
56081 ↔ St. James ↔ MN0312

**Table 15** – KAAL Viewing in **Hanska** (zip code **56041**)

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	4	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	2	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID
56041 ↔ Hanska ↔ MN1189

**Table 16** – KAAL Viewing in **Sleepy Eye** (zip code **56085**)

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	5	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	5	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Concerning the Zip Code ↔ Community ↔ CUID(s) correlation: The Postal Service assigns zip code 56085 to Sleepy Eye as the default, preferred community. Other recognized names are Cobden and Evan. Cobden is a mere hamlet with only 36 inhabitants, seven miles west of Sleepy Eye. Its post office was discontinued in 1972. See [https://en.wikipedia.org/Cobden,\\_Minnesota](https://en.wikipedia.org/Cobden,_Minnesota). On the USPS website, the input ‘Sleepy Eye’ yields 56085 only and the input ‘Cobden’ yields 56085 only. However, the input ‘Evan’ yields 56085 and 56266. The input ‘56266’ yields the community names Morgan and Evan; and the input ‘Morgan’ yields 56266 only. In point of fact, Sleepy Eye and Cobden are enclosed by zip code 56085 while Evan and Morgan are enclosed by zip code 56266. The FCC’s COALS database reflects that Sleepy Eye is a Community Unit, whereas Cobden is not.

This is an obvious case where Nielsen’s reliance on zip codes to identify communities, on one hand, and the redundancy built into the zip code system by the US Postal Service, on the other, generate ambiguity. Here, however, the issue is wholly academic because, with respect to KAAL viewing in Sleepy Eye (as well as most of the other communities studied), viewership of the station is nil. Both the Share and Cume statistics are zero within the 56085 zip code.

**Table 17 – KAAL Viewing in Springfield (zip code 56087)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	3	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	4	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID
56087 ↔ Springfield ↔ MN0134

**Table 18 – KAAL Viewing in New Ulm (zip code 56073)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov	3	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

2013						
Feb/May 2014	4	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Concerning the Zip Code ↔ Community ↔ CUID(s) correlation: On the USPS website, the input ‘New Ulm’ yields zip code 56073 and the input ‘56073’ yields New Ulm as the preferred, default community name. Essig, Klossner and Searles are shown on the USPS site as additional recognized names for 56073. However, as in the case of Sleepy Eye (Table 16), the issue is moot with respect to viewing of KAAL in New Ulm because the surveys recorded no such viewing. That is, the Share and Cume statistics are zero within zip code 56073.

WFTC – Independent (My Network TV)  
 Facility ID: 11913  
 Minneapolis-St. Paul DMA

**Table 19 – WFTC Viewing in North Mankato (zip code 56003)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 2   5
Feb/Nov 2013	10	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	4	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Concerning the Zip Code ↔ Community ↔ CUID(s) correlation, see the discussion following Tables 1 and 2.

**Table 20 – WFTC Viewing in Good Thunder (zip code 56037)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 2   5
Feb/Nov 2013	3	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No
Feb/May 2014	7	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Zip Code ↔ Community ↔ CUID
56037 ↔ Good Thunder ↔ MN1275

KMSP – Fox affiliate Facility ID: 68883 Minneapolis-St. Paul DMA
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**Table 21 – KMSP-TV Viewing in Mankato (zip code 56001)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	22	[6.51] + [5.17]	11.68	[11.85] + [7.24]	19.09	Yes   No
Feb/May 2014	23	[2.15] + [1.61]	3.76	[12.03] + [7.52]	19.55	Yes   No

**Table 22 – KMSP-TV Viewing in North Mankato (zip code 56003)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	10	[0.97] + [1.06]	2.03	[10.86] + [14.64]	25.5	No   Yes
Feb/May 2014	4	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No   No

Concerning the Zip Code ↔ Community ↔ CUID(s) correlations for Mankato and North Mankato, see the discussion following Tables 1 and 2.

**Table 23 – KMSP-TV Viewing in Good Thunder (zip code 56037)**

Survey Periods	Households Studied	[Share] + [Standard Error]	Effective Share	[Cume] + [Standard Error]	Effective Cume	Thresholds 3   25
Feb/Nov 2013	3	[0.57] + [0.49]	1.06	[35.54] + [20.55]	56.09	No   Yes
Feb/May 2014	7	[0.28] + [0.26]	0.54	[0.57] + [0.49]	1.06	No   No

Zip Code ↔ Community ↔ CUID
56037 ↔ Good Thunder ↔ MN1275

**Table 24 – KMSP-TV Viewing in New Ulm (zip code 56073)**

Survey Periods	Households Studied	[Share] +	Effective Share	[Cume] +	Effective Cume	Thresholds	
		[Standard Error]		[Standard Error]		3	25
Feb/Nov 2013	3	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No	No
Feb/May 2014	4	[0.00] + [0.00]	0.00	[0.00] + [0.00]	0.00	No	No

Concerning the Zip Code ↔ Community ↔ CUID(s) correlation: As noted above under Table 18, on the USPS website, the input ‘New Ulm’ yields zip code 56073 and the input ‘56073’ yields New Ulm as the preferred, default community name. Essig, Klossner and Searles are shown on the USPS site as additional recognized names for 56073. However, the issue is moot with respect to viewing of KMSP-TV in New Ulm. As with KAAL, within the zip code 56073, the station is not viewed at all. The Share and Cume numbers are zero.

Given that New Ulm is located far outside the 36 dBu service contour of KMSP-TV, as New Ulm is more than 75 miles from the KMSP-TV transmitter site in Shoreview, Minnesota, these results are not surprising.

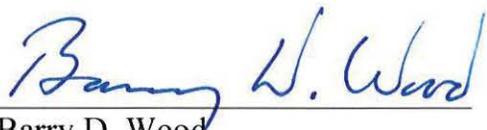
#### **IV. CONCLUSION**

A dominant theme of the Commission’s approach to matters relating to program exclusivity is that its Rules should neutralize factors that disrupt the fluid functioning of the Localism model. When, as here, the dynamics necessary to achieve the purposes of that model are being undercut, the FCC provides remedies. One of these is to undo significantly viewed status that is no longer accurate.

Based on the foregoing, it is clear that the Distant Stations are not entitled to the protection of the significantly-viewed status they currently enjoy. Accordingly, United requests that the Commission remove such status from the Distant Stations with respect to the Relevant Communities, and grant the other, related relief sought herein.

Respectfully submitted,

**UNITED COMMUNICATIONS  
CORPORATION**

By:   
Barry D. Wood  
Ronald D. Maines

WOOD, MARTIN & HARDY, PC  
3300 Fairfax Drive, Suite 202  
Arlington, Virginia 22201  
(703) 465-2361

February 19, 2016

Its counsel

**NIELSEN DATA**



The attached report provides audience net weekly circulation (cume) and share information among non-cable/non-ADS households for multiple stations during the Nielsen Station Index (NSI) survey conducted over four week periods during the Feb 2013, Nov 2013, Feb 2014, and May 2013 measurement periods. The report is based on zip codes. Households will maintain the reported Nielsen Viewers in Profile (VIP) weights used to project in-tab sample households to universe estimates for their respective measurement periods. This study measures non-cable/non-ADS household viewing between 7AM-1AM, Monday to Sunday.

The sample source for this survey consisted of non-cable/non-ADS TV households returning usable television viewing diaries. NSI procedures were used for distributing diaries and for compiling the estimated audience projections in this report. Average quarter hour projections were computed by summing weights for quarter hours in the daypart for the non-cable/non-ADS in-tab households and dividing by the number of quarter hours in the daypart. The weights which were used for projections are those used to project in-tab sample households to universe estimates in the regular Nielsen Viewers in Profile analysis. Share and cume estimates as well as their respective standard errors are computed for each of the geographies as follows:

Shares of total viewing are computed by dividing average quarter hour M-Su 7AM-1AM projections of a given station for the non-cable/non-ADS in-tab households by the average quarter hour M-Su 7AM-1AM projections in non-cable/non-ADS households across all stations. The associated standard error is calculated using the accepted formula for computing the standard error of a ratio estimate and is shown below:

The average weekly circulation (cume) is an average of the four weeks of the measurement period. The cume was computed by summing the weights for all non-cable/non-ADS households tuning at least one quarter hour to a given station within the cycle during the M-Su 7AM-1AM daypart and dividing by the sum of all non-cable/non-ADS weights within the given measurement period for each week. The cume for each week in the measurement period is then summed and divided by the number of weeks in the measurement period to compute the average weekly cume. The associated standard error for the average weekly cume is calculated using the accepted formula for computing the standard error of a ratio estimate. This standard error is the error of the average weekly cume; it is not an average of the weekly standard error. The formulas used are shown below:

Share

$$Share = \frac{\sum_1^n (w * Qhrs(s))}{\sum_1^n (w * Qhrs(t))}$$

Share Standard Error



$$\text{Std Error} = \sqrt{\frac{n}{n-1} * \sum_1^n \left[ \frac{(w * Qhrs(s)) - (\text{Share} * w * Qhrs(t))}{\sum_1^n (w * Qhrs(t))} \right]^2}$$

where  $n$  = number of intab households

where  $w$  = household weight

where  $Qhrs(s)$  = total quarter hours tuned to station of interest by household

where  $Qhrs(t)$  = total quarter hours tuned by household

#### Average Weekly Cume

$$\text{Average Weekly Cume} = \frac{1}{z} * \sum_1^z \left[ \frac{\sum_1^n (\text{HH Weight} * x)}{\sum_1^n \text{HH Weight}} \right]$$

#### Average Weekly Cume Standard Error

$$\text{Std Error} = \sqrt{\frac{1}{z^2} \sum_1^z \left[ \frac{n}{n-1} * \sum_1^n \left[ \frac{(x - \text{Week Cume}) * \text{HH Weight}}{\sum_1^n \text{HH Weight}} \right]^2 \right]}$$

where  $z$  = number of weeks in analysis (with non-zero intabs)

where  $n$  = number of intab households in week

where  $x = 0$  if household did not tune station of interest

where  $x = 1$  if household did tune station of interest

The attached report is representative of the viewing patterns of the non-cable/non-ADS households of the geographic area surveyed.



Significant Viewing Study  
 Mankato  
 Feb13, Nov13, Feb14, May14  
 Su-Sa 7A-1A  
 WCCO-TV

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56001	Number of Intabs	11	11	10	13	22	23	45
	Average Weekly Cume	0.00	5.47	10.39	0.00	2.79	4.04	3.37
	Cume Std. Error	0.00	6.41	12.14	0.00	2.90	4.25	2.38
	Share	0.00	5.39	1.55	0.00	1.86	0.88	1.09
	Share Std. Error	0.00	3.58	1.61	0.00	1.71	0.88	0.79

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56010	Number of Intabs	1	1	0	2	2	2	4
	Average Weekly Cume	0.00	0.00	-	0.00	0.00	0.00	0.00
	Cume Std. Error	0.00	0.00	-	0.00	0.00	0.00	0.00
	Share	0.00	0.00	-	0.00	0.00	0.00	0.00
	Share Std. Error	-	-	-	0.00	0.00	0.00	0.00

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56037	Number of Intabs	1	2	1	6	3	7	10
	Average Weekly Cume	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Cume Std. Error	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Share	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Share Std. Error	-	0.00	-	0.00	0.00	0.00	0.00

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56055	Number of Intabs	6	0	2	1	6	3	9
	Average Weekly Cume	33.33	-	0.00	100.00	33.33	33.33	47.15
	Cume Std. Error	8.33	-	0.00	0.00	8.33	0.00	11.80
	Share	5.61	-	0.00	31.82	5.61	21.87	8.43
	Share Std. Error	3.38	-	0.00	-	3.38	11.84	3.93

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56063	Number of Intabs	1	4	2	0	5	2	7
	Average Weekly Cume	100.00	0.00	50.00	-	14.01	50.00	35.50
	Cume Std. Error	0.00	0.00	0.00	-	16.24	0.00	12.18
	Share	4.86	0.00	5.69	-	0.99	5.69	1.80
	Share Std. Error	-	0.00	0.00	-	1.01	0.00	1.15

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56062	Number of Intabs	2	2	3	3	4	6	10
	Average Weekly Cume	0.00	48.01	25.00	33.33	16.00	24.60	24.55
	Cume Std. Error	0.00	49.92	25.00	0.00	16.64	17.67	14.43
	Share	0.00	1.40	0.26	2.52	1.05	1.17	1.13
	Share Std. Error	0.00	1.96	0.26	1.20	1.17	0.87	0.67

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56081	Number of Intabs	5	3	4	7	8	11	19
	Average Weekly Cume	33.33	0.00	25.00	46.21	11.91	32.70	30.02
	Cume Std. Error	0.00	0.00	0.00	15.05	11.48	16.05	11.31
	Share	0.87	0.00	18.39	1.15	0.69	11.35	9.03
	Share Std. Error	0.98	0.00	15.24	0.61	0.73	9.40	7.47

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56041	Number of Intabs	3	1	2	0	4	2	6
	Average Weekly Cume	0.00	0.00	0.00	-	0.00	0.00	0.00
	Cume Std. Error	0.00	0.00	0.00	-	0.00	0.00	0.00
	Share	0.00	0.00	0.00	-	0.00	0.00	0.00
	Share Std. Error	0.00	-	0.00	-	0.00	0.00	0.00

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56085	Number of Intabs	4	1	2	3	5	5	10
	Average Weekly Cume	33.33	0.00	50.00	73.22	33.33	48.81	38.77
	Cume Std. Error	0.00	0.00	0.00	24.87	0.00	16.58	9.54
	Share	10.64	0.00	2.12	11.29	6.26	7.79	7.30
	Share Std. Error	11.93	-	0.46	2.99	7.16	3.74	3.32

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56087	Number of Intabs	2	1	2	2	3	4	7
	Average Weekly Cume	0.00	100.00	50.00	100.00	26.48	82.63	54.30
	Cume Std. Error	0.00	0.00	50.00	0.00	24.91	17.01	8.75
	Share	0.00	11.11	33.33	17.58	11.11	27.19	24.91
	Share Std. Error	0.00	-	16.99	5.35	0.00	11.30	9.78

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56003	Number of Intabs	3	7	2	2	10	4	14
	Average Weekly Cume	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Cume Std. Error	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Share	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Share Std. Error	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56073	Number of Intabs	2	1	2	2	3	4	7
	Average Weekly Cume	50.00	0.00	50.00	50.00	24.93	43.54	42.94
	Cume Std. Error	0.00	0.00	0.00	0.00	25.00	34.39	25.92
	Share	41.14	0.00	6.56	10.00	37.96	7.79	27.02
	Share Std. Error	16.87	-	0.00	0.00	15.61	1.29	14.24

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56001, 56002, 56003, 56006	Number of Intabs	14	18	12	15	32	27	59
	Average Weekly Cume	0.00	2.32	10.39	0.00	1.54	3.52	2.24
	Cume Std. Error	0.00	2.41	12.14	0.00	1.57	3.64	1.58
	Share	0.00	2.47	1.55	0.00	1.15	0.84	0.94
	Share Std. Error	0.00	2.15	1.60	0.00	1.09	0.84	0.67







Significant Viewing Study  
Mankato  
Feb13, Nov13, Feb14, May14  
Su-Sa 7A-1A  
WFTC

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56001	Number of Intabs	11	11	10	13	22	23	45
	Average Weekly Cume	8.23	5.47	25.00	0.00	5.82	13.48	10.15
	Cume Std. Error	8.27	6.41	0.00	0.00	4.07	7.17	4.96
	Share	3.09	1.80	2.34	0.00	2.64	1.32	1.61
	Share Std. Error	2.87	1.19	1.58	0.00	1.88	0.96	0.85

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56010	Number of Intabs	1	1	0	2	2	2	4
	Average Weekly Cume	0.00	100.00	-	50.00	52.08	50.00	50.69
	Cume Std. Error	0.00	0.00	-	0.00	49.91	0.00	16.64
	Share	0.00	27.59	-	7.54	14.02	7.54	10.23
	Share Std. Error	-	-	-	9.61	13.79	9.61	7.05

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56037	Number of Intabs	1	2	1	6	3	7	10
	Average Weekly Cume	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Cume Std. Error	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Share	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Share Std. Error	-	0.00	-	0.00	0.00	0.00	0.00

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56055	Number of Intabs	6	0	2	1	6	3	9
	Average Weekly Cume	25.00	-	0.00	0.00	25.00	0.00	25.00
	Cume Std. Error	0.00	-	0.00	0.00	0.00	0.00	0.00
	Share	10.08	-	0.00	0.00	10.08	0.00	8.33
	Share Std. Error	7.28	-	0.00	-	7.28	0.00	6.32

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56063	Number of Intabs	1	4	2	0	5	2	7
	Average Weekly Cume	100.00	0.00	50.00	-	14.01	50.00	35.50
	Cume Std. Error	0.00	0.00	0.00	-	16.24	0.00	12.18
	Share	2.16	0.00	17.07	-	0.44	17.07	3.32
	Share Std. Error	-	0.00	0.00	-	0.45	0.00	2.88

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56062	Number of Intabs	2	2	3	3	4	6	10
	Average Weekly Cume	0.00	51.99	75.00	0.00	17.33	25.40	25.45
	Cume Std. Error	0.00	49.92	25.00	0.00	16.64	17.67	14.43
	Share	0.00	1.52	3.06	0.00	1.13	1.84	1.62
	Share Std. Error	0.00	0.92	2.59	0.00	0.77	1.52	1.02

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56081	Number of Intabs	5	3	4	7	8	11	19
	Average Weekly Cume	0.00	25.00	50.00	8.10	10.71	23.59	24.21
	Cume Std. Error	0.00	25.00	0.00	8.21	10.91	11.17	9.89
	Share	0.00	11.75	1.65	0.43	2.47	1.15	1.44
	Share Std. Error	0.00	10.25	1.03	0.37	2.63	0.65	0.72

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56041	Number of Intabs	3	1	2	0	4	2	6
	Average Weekly Cume	100.00	0.00	0.00	-	78.24	0.00	40.83
	Cume Std. Error	0.00	0.00	0.00	-	15.11	0.00	15.25
	Share	4.80	0.00	0.00	-	2.39	0.00	1.64
	Share Std. Error	2.95	-	0.00	-	1.91	0.00	1.18

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56085	Number of Intabs	4	1	2	3	5	5	10
	Average Weekly Cume	16.67	0.00	0.00	23.22	16.67	15.48	22.24
	Cume Std. Error	16.67	0.00	0.00	24.87	16.67	16.58	15.55
	Share	2.39	0.00	0.00	8.35	1.41	5.16	3.97
	Share Std. Error	2.40	-	0.00	2.83	1.52	3.62	2.64

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56087	Number of Intabs	2	1	2	2	3	4	7
	Average Weekly Cume	0.00	0.00	100.00	0.00	0.00	34.73	18.72
	Cume Std. Error	0.00	0.00	0.00	0.00	0.00	15.91	8.77
	Share	0.00	0.00	7.84	0.00	0.00	4.78	4.11
	Share Std. Error	0.00	-	3.84	0.00	0.00	2.55	2.15

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56003	Number of Intabs	3	7	2	2	10	4	14
	Average Weekly Cume	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Cume Std. Error	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Share	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Share Std. Error	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56073	Number of Intabs	2	1	2	2	3	4	7
	Average Weekly Cume	50.00	0.00	0.00	50.00	24.93	19.14	26.67
	Cume Std. Error	0.00	0.00	0.00	0.00	25.00	23.63	19.86
	Share	3.89	0.00	0.00	30.00	3.59	10.70	6.17
	Share Std. Error	1.60	-	0.00	0.00	1.48	11.24	3.83

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56001, 56002, 56003, 56006	Number of Intabs	14	18	12	15	32	27	59
	Average Weekly Cume	6.60	2.32	17.04	0.00	3.21	10.77	8.29
	Cume Std. Error	6.62	2.41	8.14	0.00	2.25	6.26	4.25
	Share	2.34	0.82	2.34	0.00	1.63	1.27	1.38
	Share Std. Error	2.21	0.72	1.57	0.00	1.22	0.92	0.73



Significant Viewing Study  
Mankato  
Feb13, Nov13, Feb14, May14  
Su-Sa 7A-1A  
KMSP-TV

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56001	Number of Intabs	11	11	10	13	22	23	45
	Average Weekly Cume	8.30	13.62	12.50	9.34	11.85	12.03	12.72
	Cume Std. Error	8.32	12.58	12.50	6.02	7.24	7.52	5.27
	Share	1.04	16.85	2.99	1.06	6.51	2.15	3.10
	Share Std. Error	1.10	12.93	2.88	0.51	5.17	1.61	1.69

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56010	Number of Intabs	1	1	0	2	2	2	4
	Average Weekly Cume	0.00	100.00	-	50.00	52.08	50.00	50.69
	Cume Std. Error	0.00	0.00	-	0.00	49.91	0.00	16.64
	Share	0.00	27.59	-	15.09	14.02	15.09	14.65
	Share Std. Error	-	-	-	19.22	13.79	19.22	10.26

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56037	Number of Intabs	1	2	1	6	3	7	10
	Average Weekly Cume	0.00	50.00	0.00	12.75	35.54	12.75	18.82
	Cume Std. Error	0.00	0.00	0.00	12.50	20.55	12.50	13.77
	Share	0.00	0.63	0.00	0.33	0.57	0.28	0.39
	Share Std. Error	-	0.61	-	0.30	0.49	0.26	0.23

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56055	Number of Intabs	6	0	2	1	6	3	9
	Average Weekly Cume	58.33	-	0.00	0.00	58.33	0.00	42.32
	Cume Std. Error	8.33	-	0.00	0.00	8.33	0.00	13.55
	Share	4.28	-	0.00	0.00	4.28	0.00	3.54
	Share Std. Error	1.20	-	0.00	-	1.20	0.00	1.29

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56063	Number of Intabs	1	4	2	0	5	2	7
	Average Weekly Cume	100.00	33.33	0.00	-	47.34	0.00	23.74
	Cume Std. Error	0.00	0.00	0.00	-	16.24	0.00	17.42
	Share	3.24	2.02	0.00	-	2.27	0.00	1.88
	Share Std. Error	-	2.01	0.00	-	1.58	0.00	1.31

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56062	Number of Intabs	2	2	3	3	4	6	10
	Average Weekly Cume	50.00	48.01	50.00	33.33	49.34	50.00	55.88
	Cume Std. Error	0.00	49.92	0.00	0.00	16.64	0.00	6.00
	Share	9.47	7.71	6.53	2.54	8.16	4.93	5.95
	Share Std. Error	0.00	10.77	4.69	3.55	6.70	3.14	2.81

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56081	Number of Intabs	5	3	4	7	8	11	19
	Average Weekly Cume	54.58	50.00	75.00	45.86	54.58	55.20	57.06
	Cume Std. Error	11.60	0.00	0.00	14.95	11.60	20.20	13.13
	Share	5.18	20.57	10.47	3.74	8.41	7.72	7.87
	Share Std. Error	3.21	4.95	4.46	1.82	3.68	3.01	2.42

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56041	Number of Intabs	3	1	2	0	4	2	6
	Average Weekly Cume	100.00	100.00	50.00	-	100.00	50.00	82.15
	Cume Std. Error	0.00	0.00	0.00	-	0.00	0.00	10.21
	Share	6.52	23.32	1.75	-	14.97	1.75	10.83
	Share Std. Error	4.05	-	1.56	-	6.13	1.56	5.48

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56085	Number of Intabs	4	1	2	3	5	5	10
	Average Weekly Cume	50.00	100.00	0.00	100.00	71.35	43.90	54.61
	Cume Std. Error	16.67	0.00	0.00	0.00	22.66	14.44	18.78
	Share	1.00	3.60	0.00	8.56	2.07	5.29	4.27
	Share Std. Error	0.68	-	0.00	1.40	0.96	2.63	1.82

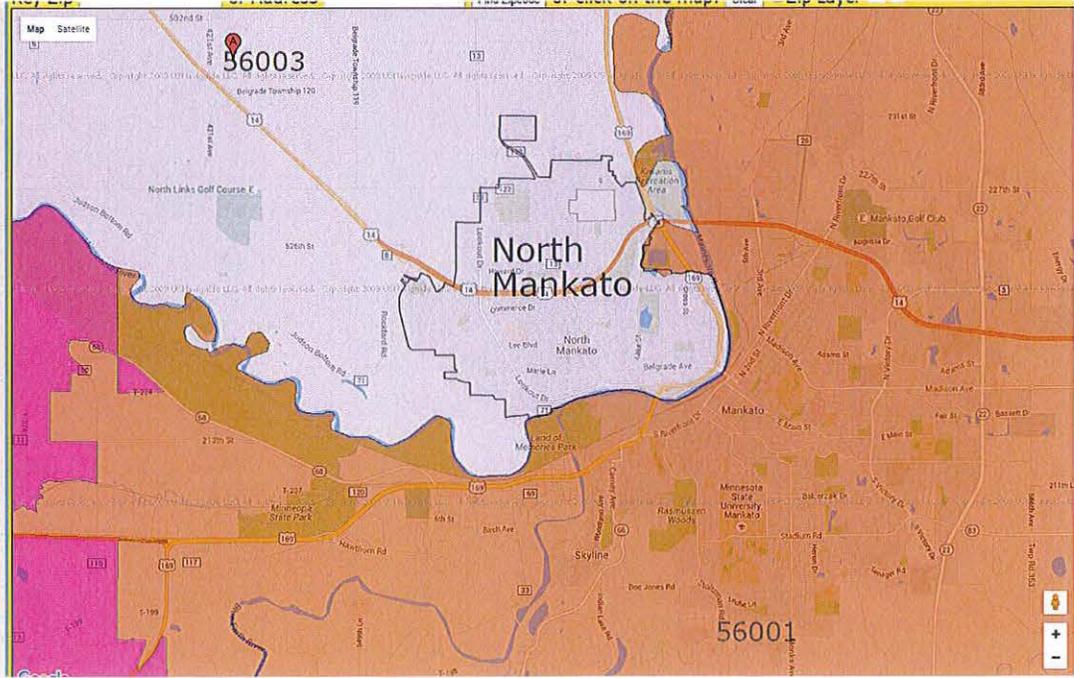
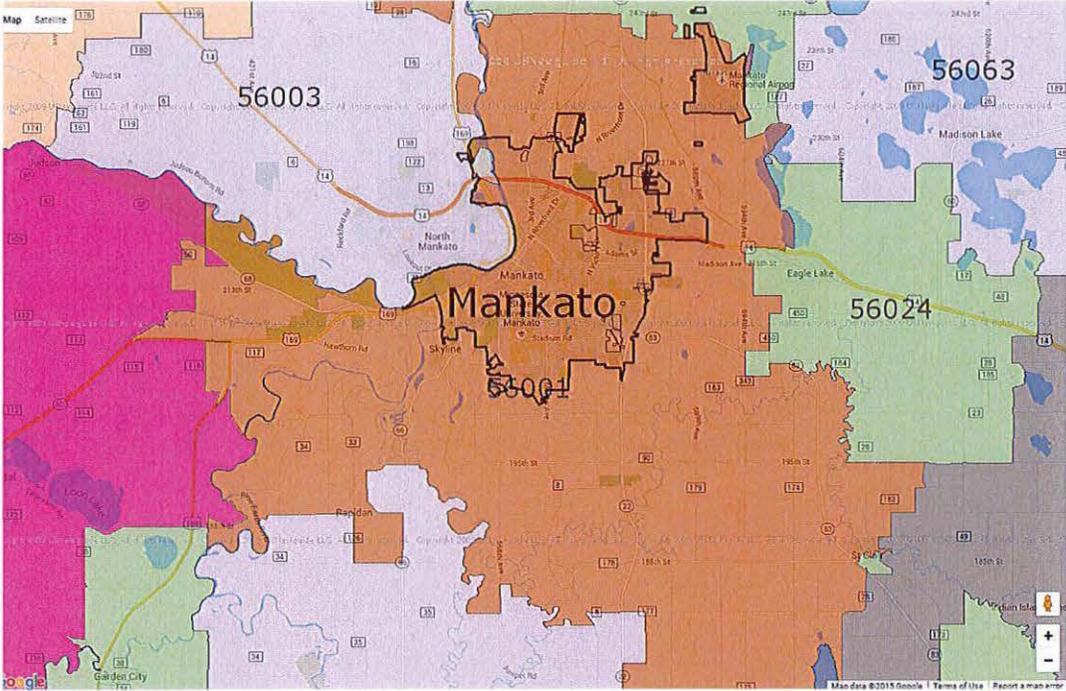
Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56087	Number of Intabs	2	1	2	2	3	4	7
	Average Weekly Cume	0.00	100.00	50.00	50.00	26.48	67.37	46.07
	Cume Std. Error	0.00	0.00	50.00	0.00	24.91	17.01	8.79
	Share	0.00	5.23	4.90	15.24	5.23	8.94	8.41
	Share Std. Error	0.00	-	2.50	8.22	0.00	4.55	3.72

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56003	Number of Intabs	3	7	2	2	10	4	14
	Average Weekly Cume	33.33	0.00	0.00	0.00	10.86	0.00	5.41
	Cume Std. Error	0.00	0.00	0.00	0.00	14.64	0.00	6.38
	Share	2.87	0.00	0.00	0.00	0.97	0.00	0.78
	Share Std. Error	3.76	0.00	0.00	0.00	1.06	0.00	0.82

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56073	Number of Intabs	2	1	2	2	3	4	7
	Average Weekly Cume	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Cume Std. Error	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Share	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Share Std. Error	0.00	-	0.00	0.00	0.00	0.00	0.00

Geography Grouping	Results	Feb13	Nov13	Feb14	May14	Combined (Feb13 & Nov13)	Combined (Feb14 & May14)	Combined (All 4 Sweeps)
56001, 56002, 56003, 56006	Number of Intabs	14	18	12	15	32	27	59
	Average Weekly Cume	18.16	11.24	8.52	9.34	12.53	10.11	11.60
	Cume Std. Error	13.12	8.95	8.43	6.02	6.99	6.22	4.56
	Share	1.48	7.72	2.99	0.96	4.39	2.06	2.77
	Share Std. Error	1.13	6.63	2.86	0.47	3.26	1.54	1.45

ZIP CODE MAP



**FCC FORM 159**

# Agency Tracking ID:PGC2799405 Authorization Number:92065G Successful Authorization -- Date Paid: 2/19/16 FILE COPY ONLY!!

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING  (1) LOCKBOX #979089	FEDERAL COMMUNICATIONS COMMISSION <b>REMITTANCE ADVICE</b> <b>FORM 159</b> PAGE NO 1 OF 1	APPROVED BY OMB 3060-059 SPECIAL USE FCC USE ONLY
<b>SECTION A - Payer Information</b>		
(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) <b>Wood, Martin &amp; Hardy, P.C.</b>		(3) TOTAL AMOUNT PAID (dollars and cents) <b>\$1465.00</b>
(4) STREET ADDRESS LINE NO. 1 <b>3300 Fairfax Dr.</b>		
(5) STREET ADDRESS LINE NO. 2 <b>Suite 202</b>		
(6) CITY <b>Arlington</b>	(7) STATE <b>VA</b>	(8) ZIP CODE <b>22201-4400</b>
(9) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) <b>703-4652361</b>		(10) COUNTRY CODE (IF NOT IN U.S.A.) <b>US</b>
<b>FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED</b>		
(11) PAYER (FRN) <b>0003778412</b>		(12) FCC USE ONLY
<b>IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)</b>		
(13) APPLICANT NAME <b>Wood, Martin &amp; Hardy, P.C.</b>		
(14) STREET ADDRESS LINE NO. 1 <b>3300 Fairfax Dr.</b>		
(15) STREET ADDRESS LINE NO. 2 <b>Suite 202</b>		
(16) CITY <b>Arlington</b>	(17) STATE <b>VA</b>	(18) ZIP CODE <b>22201-4400</b>
(19) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) <b>703-4652361</b>		(20) COUNTRY CODE (IF NOT IN U.S.A.) <b>US</b>
<b>FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED</b>		
(21) APPLICANT (FRN) <b>0003778412</b>		(22) FCC USE ONLY
<b>COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET</b>		
(23A) FCC Call Sign/Other ID <b>KEYC-TV</b>	(24A) Payment Type Code(PTC) <b>TQC</b>	(25A) Quantity <b>1</b>
(26A) Fee Due for (PTC) <b>\$1,465.00</b>	(27A) Total Fee <b>\$1465.00</b>	FCC Use Only
(28A) FCC CODE 1 <b>N/A</b>	(29A) FCC CODE 2 <b>N/A</b>	
(23B) FCC Call Sign/Other ID	(24B) Payment Type Code(PTC)	(25B) Quantity
(26B) Fee Due for (PTC)	(27B) Total Fee	FCC Use Only
(28B) FCC CODE 1	(29B) FCC CODE 2	



## CERTIFICATE OF SERVICE

I, Talya Dong, legal assistant with the firm of Wood, Martin & Hardy, P.C., hereby certify that on February 19, 2016, a copy of the foregoing "Petition for Special Relief" was deposited in the U.S. mail, postage prepaid, addressed to the following:

CC VIII Operating LLC  
12405 Powerscourt Drive  
St. Louis, MO 63131

Consolidated Communications  
221 East Hickory Street  
Mankato, Minnesota 56001

Fort Randall Cable Systems, Inc.  
1700 Technology Drive NE  
Suite 100  
Willmar, Minnesota 56201

KAAL Television  
1701 10th Place NE  
Austin, Minnesota 55912

KIMT Television  
112 N Pennsylvania Avenue  
Mason City, Iowa 50401

Mediacom Minnesota LLC  
One Mediacom Way  
Mediacom Park, New York 10918

Midcontinent Communications  
3901 North Louise Avenue  
Sioux Falls, South Dakota 57107

Sleepy Eye Telephone Co.  
c/o New Ulm Telecom, Inc.  
27 North Minnesota Street  
P.O. Box 697  
New Ulm, Minnesota 56073

WCCO-TV  
90 South 11th Street  
Minneapolis, Minnesota 55403

Channel 29 Stations  
WFTC and KMSP-TV  
11358 Viking Drive  
Eden Prairie, Minnesota 55344

Comcast  
One Comcast Center  
Philadelphia, PA 19103

Cable Franchise Authority  
City of Mankato  
10 Civic Center Plaza  
Mankato, MN 56001

Cable Franchise Authority  
City of North Mankato  
1001 Belgrade Avenue  
North Mankato, MN 56002

Cable Franchise Authority  
Amboy City Hall  
244 East Maine Street  
P.O. Box 250  
Amboy, MN 56010

Cable Franchise Authority  
Good Thunder City Hall  
130 South Ewing Street  
P.O. Box 97  
Good Thunder, MN 56037

Cable Franchise Authority  
Madelia City Hall  
116 West Main Street  
Madelia, MN 56062

Cable Franchise Authority  
City of Hanska  
P.O. Box 91  
Hanska, MN 56041

Cable Franchise Authority  
Lake Crystal City Hall  
100 East Robinson Street  
P.O. Box 86  
Lake Crystal, MN 56055

Cable Franchise Authority  
City of Madison Lake  
525 Main Street  
P.O. Box 295  
Madison Lake, MN 56063

Cable Franchise Authority  
St. James City Hall  
124 Armstrong Blvd. South  
P.O. Box 70  
St. James, MN 56081

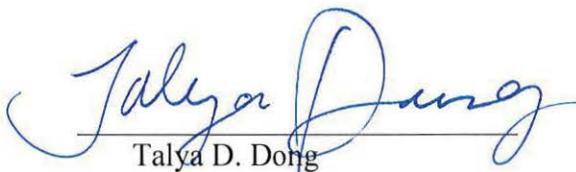
Cable Franchise Authority  
City of Sleepy Eye  
200 Main Street East  
Sleepy Eye, MN 56085

Cable Franchise Authority  
City of Springfield  
2 East Central  
Springfield, MN 56087

Cable Franchise Authority  
City of New Ulm  
100 N. Broadway Street  
New Ulm, MN 56073

DISH Corporate Office  
4700 S. Syracuse Street  
Suite 450  
Denver, CO 80237

DirecTV  
2260 E. Imperial Hwy  
El Segundo, CA 90245



Talya D. Dong

WOOD, MARTIN & HARDY, PC  
3300 Fairfax Drive, Suite 202  
Arlington, Virginia 22201  
(703) 465-2361