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December 11, 1998

VIA HAND DELIVERY

Magalie Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20054

Re: CS Docket No. 98-201; RM No. 9335; RM No. 9345
Satellite Delivery of Network Signals to Unserved Households
for Purposes of the Satellite Home Viewer Act
Comments of the Arkansas Broadcasters Association

Dear Ms. Salas:

Enclosed, on behalf of the Arkansas Broadcasters Association, are the original and 11 copies of its Comments in CS Docket No. 98-201; RM No. 9335; RM No. 9345.

If you have any questions, please contact me.

Very truly yours,



Paul J. Feldman

Counsel for

The Arkansas Broadcasters Association

PJF/jr

Enclosures

cc: Mr. Don Fowler (w/encl.)
International Transcription Service (w/encl.)

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

DEC 11 1998

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

In the Matter of)	
)	CS Docket No. 98-201
Satellite Delivery of Network Signals)	RM No. 9335
to Unserved Households for)	RM No. 9345
Purposes of the Satellite Home)	
Viewer Act)	
)	
Part 73 Definition and Measurement)	
of Signals of Grade B Intensity)	

COMMENTS OF THE ARKANSAS BROADCASTERS ASSOCIATION

**THE ARKANSAS BROADCASTERS
ASSOCIATION**

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December 11, 1998

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COMMENTS OF THE ARKANSAS BROADCASTERS ASSOCIATION

The Arkansas Broadcasters Association ("ABA"), by their attorneys, hereby file these comments in response to the Commission's Notice of Proposed Rulemaking, released November 17, 1998 in the above-captioned proceeding ("*Notice*"). The ABA strongly urges the Commission to reject proposed modifications to the definition of Grade B signal intensity that would impermissibly and irrationally reduce a station's protected Grade B area to a minor fraction of its existing service area, thus substantially impairing the ability of stations to provide free over-the-air local service to their communities. As shown in the maps attached to these Comments, under the proposals considered in this proceeding, the geographic area of exclusivity for Arkansas stations would be reduced by up to 88 percent, and the population covered by the stations' exclusive rights reduced by up to 57 percent. Such a result would be contrary not only to Congressional intent, but to long-standing Commission policies, and the public interest.

I. Introduction

Members of the ABA operate full power, network affiliated television stations.¹ Each of these stations have, for many years, provided high quality service to their communities, including important news, weather, public affairs, public service announcements and other programming directed to meet the needs of their communities for local information. However, as discussed more fully below, the production costs of such local programming are substantial, and the proposals in this proceeding seriously threaten the economic basis for the production and broadcast of local programming.

As members of their communities, the ABA members do not begrudge their neighbors the right to receive network programming by satellite if such viewers truly cannot receive the over-the-air signal of their local affiliates. The Member stations regularly grant waiver requests from viewers who demonstrate that, pursuant to the Satellite Home Viewer Act ("SHVA"), they cannot receive a Grade B signal "through use of a conventional outdoor rooftop antenna."² However, the proposals of the National Rural Telecommunications Cooperative ("NRTC") and EchoStar Communications Corporation ("EchoStar") ask the Commission to make unauthorized revisions to its rules that would not only contradict the Commission's policies on localism, they would

¹ ABA network affiliate stations are as follows: KHOG-TV, Fayetteville (ABC Television Network affiliate); KFSM-TV, Fort Smith (CBS); KHBS(TV), Fort Smith (ABC); KPOM-TV, Fort Smith (NBC); KAIT-TV, Jonesboro (ABC); KARK-TV, Little Rock (NBC); KATV(TV), Little Rock (ABC); KLRT(TV), Little Rock (FOX), KTHV(TV), Little Rock (CBS), KFAA, Rogers (NBC).

² See 17 U.S.C. § 119(d)(10)(A).

so substantially decrease a station's protected service area, as to make a mockery out of the term "unserved household."

II. The Proposed Revisions to the Definition of Grade B Signal Intensity Would Impermissibly and Irrationally Reduce a Station's Protected Area of Exclusivity to a Minor Fraction of its Current Area.

As stated in paragraph 9 of the *Notice*, NRTC asks the Commission to adopt, for the purposes of interpreting SHVA, a new definition of "unserved" to include those households located outside of a "Grade B " contour in which 100 percent of the population receives over-the-air coverage by a network affiliate 100 percent of the time, using "readily available, affordable receiving equipment." EchoStar urges the Commission to endorse a predictive model under which an unserved household would be defined as those outside of a contour within which 99 percent of households receive a Grade B signal 99 percent of the time with a 99 percent level of confidence. By reducing the "Grade B" contour for purposes of SHVA, the satellite operators hope to substantially reduce the area in which affiliates hold the exclusive rights to deliver network programming, and thus increase the number of "unserved households" to which satellite operators can deliver such programming. However, both the redefinition of the Grade B intensity standard for SHVA, and the resulting massive reduction of the area of an affiliate's exclusivity, are patently inconsistent with Congressional intent in the enactment of SHVA.

A. Congress Explicitly Intended to "Freeze" the 1988 Definition of Grade B Signal Intensity for Purposes of SHVA Enforcement.

The *Notice* wisely seeks comments as to whether the Commission even has authority to revise the definition of Grade B signal intensity for purposes of SHVA. The

answer appears to be clear, however, that Congress intended to “freeze” the 1988 definition of Grade B signal intensity into the definition of “unserved household”. The *House Report* explicitly defines “unserved household” as “a household that with respect to a particular network; (A) cannot receive, through the use of a conventional outdoor antenna, a signal of Grade B intensity (as defined by the FCC *currently* in 47 C.F.R. Section 73.683(a))”.³ The word “currently” could not be more explicit, and obviously refers to the definition of Grade B as it existed in 1988. While the Commission certainly has the authority to revise Section 73.683(a) of its rules, even if the Commission were to do so, it would be contrary to Congressional intent to apply that revised definition to SHVA enforcement.

*B. Congress Did Not Intend the Commission to Alter the
Very Limited Relief Provided to Satellite Operators in SHVA.*

In its *Notice*, the Commission acknowledges that SHVA constituted a “limited exception” to the exclusive copyright held by television networks and their affiliates to transmit programming to viewers. *Notice* at para. 2. However, EchoStar and NRTC are asking the Commission to ignore the limited nature of the relief that Congress intended to provide to satellite operators in SHVA. Congress’ intent to limit that relief is first demonstrated by the language of the Act itself, which defines an “unserved household” as one that cannot receive an affiliate’s Grade B signal using an outdoor rooftop antenna, instead of a Grade A signal, or a signal measured indoors. Congressional

³ H.R. Rep. No. 887, Part 2, 100th Cong., 2d Sess. 26 (1988) (hereinafter, “*House Report II*”) (emphasis added).

intent to limit the relief granted to satellite operators is made even more explicit in the legislative history of the Act:

The special statutory copyright for satellite service was created in recognition of the fact that a *small percentage* of television households cannot now receive a clear signal of the three national television networks.⁴

Furthermore, Congress' intent that the impact of SHVA be very limited was based in part on representations by the satellite carriers that the need for relief was very limited, noting that the carriers "all agree that approximately 1 percent or approximately 1 million is the figure" for white area ("unserved") households.⁵ Indeed, at that time, the Commission itself reached a similar conclusion on this issue. In Re Inquiry into the Scrambling of Satellite Television Signals and Access to Those Signals by Owners of Home Satellite Dish Antennas, Second Report and Order, 3 FCC Rcd 1202, 1209 (1988)(stating that only "800,000 to 1 million households" are unable to receive the over-the-air signal of local network affiliates).

Nevertheless, EchoStar and NRTC now ask the Commission to ignore Congressional intent, the contemporaneous representations made by satellite operators to Congress, and the Commission's own findings, by redefining the signal intensity level and methodologies for measuring Grade B, in a manner designed to massively increase

⁴ H.R. Rep. No. 887, Part 1, 100th Cong., 2d Sess.(hereinafter "*House Report I*") at 15 (emphasis added). Indeed, Congress' decision not to modify the definition of unserved area in its 1994 revision of SHVA, further demonstrates Congress' intent that the scope of SHVA be limited.

⁵ Satellite Home Viewer Copyright Act: Hearings on H.R. 2848 Before the Subcommittee on Courts, Civil Liberties and the Administration of Justice, 100th Cong., Serial No. 89, at page 289 (Testimony of Brian J. McCauley, President, Netlink USA).

the area defined as “unserved”, and massively increase the number of viewers to whom the satellite operators may deliver network signals. But neither EchoStar nor NRTC have made any showing demonstrating that the facts regarding the ability of viewers to pick up Grade B over-the-air signals has changed since 1988, that would justify ignoring the obvious Congressional intent that SHVA apply to only a very limited number of viewers. Accordingly, the Commission cannot ignore the plain language of the Act, or Congress’ express intent, by enacting the NRTC/EchoStar proposals. Such action is unauthorized and will certainly lead to reversal by a federal appellate court.

C. *The EchoStar/NRTC Proposal is Extraordinarily Extreme, Reducing the Area of a Station’s Exclusivity Rights by Up to 88 Percent, and Reducing the Population Covered by the Station’s Rights by up to 57 Percent.*

In light of the fact that the Commission appears to lack the authority to revise the definition of Grade B signal intensity for SHVA, and the fact that Congress obviously intended that SHVA apply only to a very limited number of viewers, the EchoStar/NRTC proposals are extraordinarily extreme: as shown in the coverage maps attached hereto in Exhibit A, the EchoStar proposal would reduce the size of ABA stations’ exclusivity area by up to 88 percent, and reduce the population covered by an affiliate’s exclusivity rights by up to 57 percent! Even if the Commission had authority to make modifications to the Grade B definition for the purposes of SHVA (a point which ABA does not concede), clearly such a modification goes way beyond the level of reasonableness.

The materials in Exhibit A were produced by Techware, Inc. of Chantilly, Virginia. For each station two studies were performed. The first study was conducted to determine the station’s service area based on the current Grade B field intensity value,

using the Longley-Rice propagation model, and the normal statistical values for Location Variability (50%), Time Variability (50%) and Confidence (50%). The second study was performed to determine the station's "Grade B" service based on the method proposed by EchoStar, using the statistical values proposed by EchoStar for Location Variability (99%), Time Variability (99%) and Confidence (99%). In addition, each study also includes an evaluation of Grade A field intensity service areas. A summary sheet is provided for each station showing the population and area of service for each of two studies for both Grade B and Grade A service.

In addition to the summary sheet, a graphical representation on a map is provided. Each plot shows the areas of Grade A and Grade B service. Areas where the predicted field intensity is equal to or greater than Grade A are depicted in red. Locations where the field is equal to or greater than Grade B and less than Grade A are shown in green.⁶

The results demonstrated in the maps are dramatic and devastating. For example, for Station KTHV, Little Rock, Arkansas, the EchoStar proposal would reduce the size of that Station's exclusivity area by 88 percent, and reduce the population

⁶ The locations where the service prediction appears to end prematurely are the points where the evaluation boundary was reached. In order to show that, using the Longley-Rice method, Grade B field values are sometimes predicted beyond the traditional Grade B contour, the boundary of the area of evaluation was at least 25% beyond the predicted Grade B contour that does not use the Longley-Rice method. Indeed, these results demonstrate that many locations outside of a station's predicted Grade B contour are in fact served by that station with an actual Grade B signal. SHVA's requirement that "unserved households" be identified with actual measurements wisely recognizes this fact.

covered by that station's exclusivity rights by 57 percent.⁷ Rule revisions that would produce such extreme results cannot rationally be considered consistent with Congress' intent that the copyright granted to satellite carriers under SHVA be limited to a "small percentage" of viewers.

III. Reduction of the Area of an Affiliate's Exclusive Rights Will Result in Significant Lost Revenues for Stations, Which Will Impact Their Ability to Provide Free Local Over-the-air Service.

In enacting SHVA, Congress crafted a delicate balance between enhancing the delivery of network signals to a small number of viewers who cannot receive such signals over-the-air, with the need to preserve localism and the traditional network/affiliate relationship:

"[T]he bill respects the network/affiliate relationship and promotes localism."⁸

"This television network-affiliate distribution system involves a unique combination of national and local elements, which has evolved over a period of decades. The network provides the advantages of program acquisition or production and the sale of advertising on a national scale, as well as the special advantages flowing from the fact that its service covers a wide range of programs throughout the day.... But while the network is typically the largest supplier of nationally produced programming for its affiliates, the affiliate also decides which network programs are locally broadcast; produces local news and other programs of special interest to its local audience, and creates an overall

⁷ Figures for the other ABA network affiliate stations are as follows:

KARK population would be reduced 56.32%, KARK area would be reduced 87.20%; KATV population would be reduced 49.92%, KATV area would be reduced 80.54%; KTHV population would be reduced 56.87%, KTHV area would be reduced 88.56%; KLRT population would be reduced 52.67%, KLRT area would be reduced 85.92%.

⁸ *House Report (I)* at 14.

program schedule containing network, local and syndicated programming.”⁹

“The Committee believes that this approach will satisfy the public interest in making available network programming in these (typically rural) areas, while also respecting the public interest in protecting the network-affiliate distribution system.”¹⁰

“Free local over-the-air television stations continue to play an important role in providing the American people information and entertainment. The Committee is concerned that changes in technology, and accompanying changes in law and regulation, do not undermine the base of free local television service upon which the American people continue to rely.”¹¹

As shown in the maps attached hereto in Exhibit A, the EchoStar/NRTC proposals would largely eviscerate the area in which network affiliates can claim exclusive rights to exhibit network programming, and will result in loss of viewers for the affiliates, which will significantly impact the ability of affiliate stations to provide free, over-the-air local programming to the community. This would directly contradict Congress’ intent in enacting SHVA.

If viewers are watching a satellite feed of network programming, then they will not be watching the affiliate’s delivery of that programming. This would be a direct result of satellite delivery of network programming. An indirect loss of viewers due to satellite delivery of network programming results when viewers do not watch the affiliate feed of network programming and thus are not “led-in” to the other local and syndicated

⁹ *House Report (II)* at 20.

¹⁰ *Id.*

¹¹ *House Report (I)* at 26.

programming broadcast by the station, immediately following the network programming, or at other times.

It is no secret that loss of viewers will directly lead to loss of advertising revenues. The Commission itself has recognized, in a similar proceeding, that:

“[d]iversion imposes economic harm on local broadcasters.... A drop of even a single rating point may represent a loss of 1/3 to 1/2 of a broadcaster’s potential audience. Audience diversion translates directly into lost revenue for local broadcasters.”¹²

Diversion of viewers from local affiliates to satellite network feeds will lead to loss of revenues for affiliates for the following reasons:

-Advertising rates, and purchases, are directly related to station viewership figures. Loss of viewers directly translates into loss of advertising revenues.

-Many affiliates receive compensation directly from their network for the carriage of network programming. Such compensation is typically related to the affiliate’s viewership figures.

-Financing from banks and other financial institutions to stations is usually based in part on the station’s revenue flow. Reduced revenues often lead to less attractive financial terms in loans to stations, which further reduces station revenues.

In sum, loss of exclusivity results in loss of viewers, which results in loss of revenues. The last piece of the equation, however, is that significant loss of revenues will inevitably impair the ability of affiliates to provide free, over-the-air local programming to the community. The reduction in the provision of local service that follows a significant drop in affiliate revenues is not an easy or pleasant decision for

¹² Report and Order on Program Exclusivity, 3 FCC Rcd 5299 (1988) at para. 41; *recon*, 4 FCC Rcd 2711 (1989); *aff’d sub nom.*, United Video, Inc. v. FCC, 890 F.2d 1173 (D.C.Cir. 1989).

stations; but it is a natural and predictable business decision to cut expenses when necessary.¹³ The production of local news and public affairs programming requires out-of-pocket expenses for news sets, production facilities, mobile news vehicles, remote equipment, and reporters. To make matters worse, the reduction or elimination of local programming is more likely to occur in smaller markets where stations have less revenues than large market stations, and thus have less flexibility to absorb losses. These small markets typically have less stations providing local programming to start, so that the loss of even one local voice has a greater impact.

In sum, a substantial loss in an affiliate's area of exclusivity (reduction of its "unserved area"), as proposed by EchoStar and NRTC, will lead directly to loss of revenues, which will significantly impact the ability of affiliates to provide free over-the-air local programming. Such a result is directly contrary to Congressional intent in the enactment of SHVA. Furthermore, as shown below, such a result is directly contrary to the Commission's own policies on localism.

IV. The Impact of the EchoStar/NRTC Proposals Would Be Inconsistent with the Commission's Own Localism Principles.

In paragraph 15 of the *Notice*, the Commission "recognizes" the "important role that local broadcast stations play in their communities", but appears to view this as just one factor to balance against the desire to use SHVA enforcement to "promote competition among multichannel video programming distributors." Comments filed by

¹³ See, e.g., Dan Trigoboff, *News Not Paramount*, *Broadcasting & Cable*, December 7, 1998 at 30 (Noting that UPN affiliate KSTW, Seattle, just discontinued its local news broadcast, in part because of needs to reduce the Station's budget, and the lack of economies of scale from a single-hour news show.).

other parties earlier in this proceeding have noted the inappropriateness of the Commission's attempt to use its limited role in a copyright matter to advance unrelated telecommunications policies, and the ABA endorses that critique. But while the Commission further acknowledges, in paragraph 36 of the *Notice*, that "localism is central to [the Commission's] policies governing broadcasting...", the ABA takes this opportunity to remind the Commission just how central the principle of localism was in shaping the cable TV network non-duplication rules, which cover issues very analogous to those in this proceeding.

When the Commission first instituted rules to give local broadcast stations the right to demand protection against importation of duplicating distant signals by cable TV operators, the Commission made it clear that the primary purpose of such rules was to prevent harm to local stations, noting that its "aim in this regard is not to take any programs away from any CATV subscriber, but to preserve to local stations the credit to which they are entitled - in the eyes of advertisers and the public - for presenting programs for which they had bargained and paid in the competitive market."¹⁴ In a related proceeding at that time, the Commission noted that imported distant signals by cable TV operators "[do] not serve as an outlet for local self expression. It does not present local discussion, the local ministers or educators, the local political candidates, etc."¹⁵

¹⁴ First Report and Order on Microwave Relays (Docket Nos. 14895 and 15233), 4 RR 2d 1725, 1761 (1965).

¹⁵ Second Report and Order on CATV Regulation (Dockets Nos. 14895, 15233, and 15971) 6 RR 2d. 1717, 1778 (1966).

The basic principles of localism have not changed since that time.

Notwithstanding the growth of national cable programming channels, viewers still look to their local affiliates for local news and public affairs programming. On the evening of elections, the community looks to their local station to follow the results of local elections. The viewers in Jonesboro, Arkansas have only one television station licensed to their community: if satellite importation of a distant affiliate undercuts the ability of that station to provide local programming, what are the local viewers to do? Watch election results from a Denver station? Local programming from local stations not only informs viewers about social, political and economic matters that directly impact their communities, but helps to build strong communities.

The ABA fears that in this proceeding, the Commission will cave in to temporary political pressure, and be seduced by attractive but specious claims about how satellite operators need to import distant signals in order to compete with local cable TV operators, with the result that the Commission makes a decision destructive to the principle and practice of broadcast localism. The Commission has made a notably similar mistake in the past, when it eliminated (in 1980) the syndicated exclusivity rules, in the name of promoting competition in the production and distribution of programming. In reinstating the syndex rules in 1988, the Commission admitted that it had previously "failed to analyze the effects *on the local television market* of denying broadcasters the ability to enter into contracts with enforceable exclusive exhibition rights when they had to compete with cable operators who could enter into such contracts.... The incomplete

1980 analysis led the Commission to mischaracterize the role that exclusivity plays in the functioning of the local television market."¹⁶

The Commission should not feel compelled to make essentially the same mistake again.

V. Conclusion

SHVA froze the definition of Grade B signal intensity, for SHVA enforcement purposes, to the standards then in existence in 1988. However, even if the Commission did have the authority to modify those standards for SHVA purposes, any significant modification would reduce the viewers of network affiliate stations, reducing the revenues of those stations, and inevitably forcing those stations to reduce the provision of free over-the-air local programming. Such a result would be contrary to Congress' intent in enacting SHVA, and contrary to the Commission's own principles of localism. The Commission must reject, as unreasonable and beyond its authority, proposals to modify the Congressionally mandated definition of "unserved household".

Respectfully submitted,



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December 11, 1998

¹⁶ Report and Order on Program Exclusivity, *supra* note 11, 3 FCC Rcd 5299 at para. 23 (emphasis in original).

Exhibit A

Service Analysis for SHVA Proceeding

KARK Channel 4 Little Rock, Arkansas

Longley-Rice Analysis

SERVICE	F(50/50/50) (Grade B)		F(50/50/50) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	1,059,272	51,155	726,077	22,526

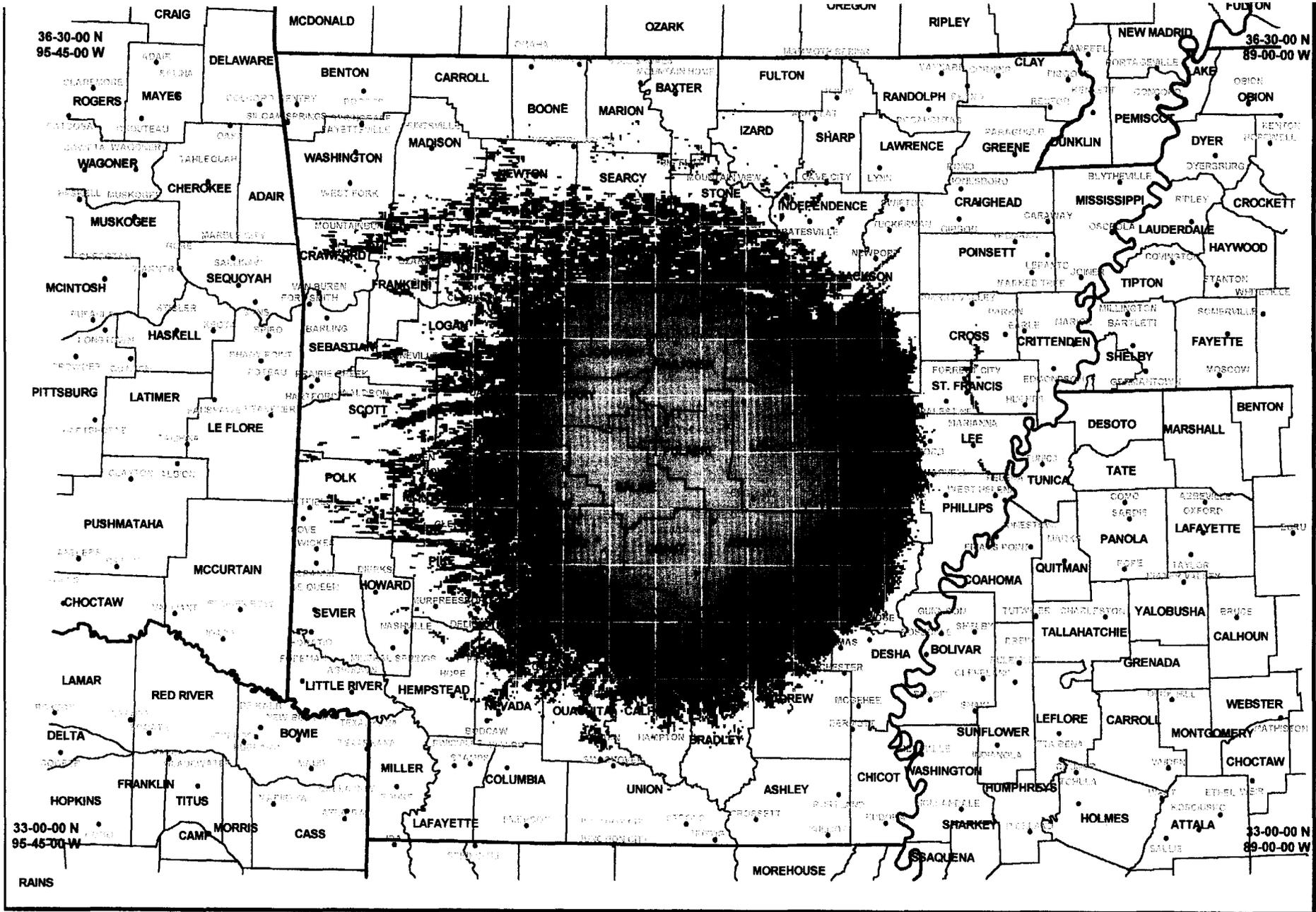
	F(99/99/99) (Grade B)		F(99/99/99) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	462,651	6,547	36,444	364

F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)

F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)

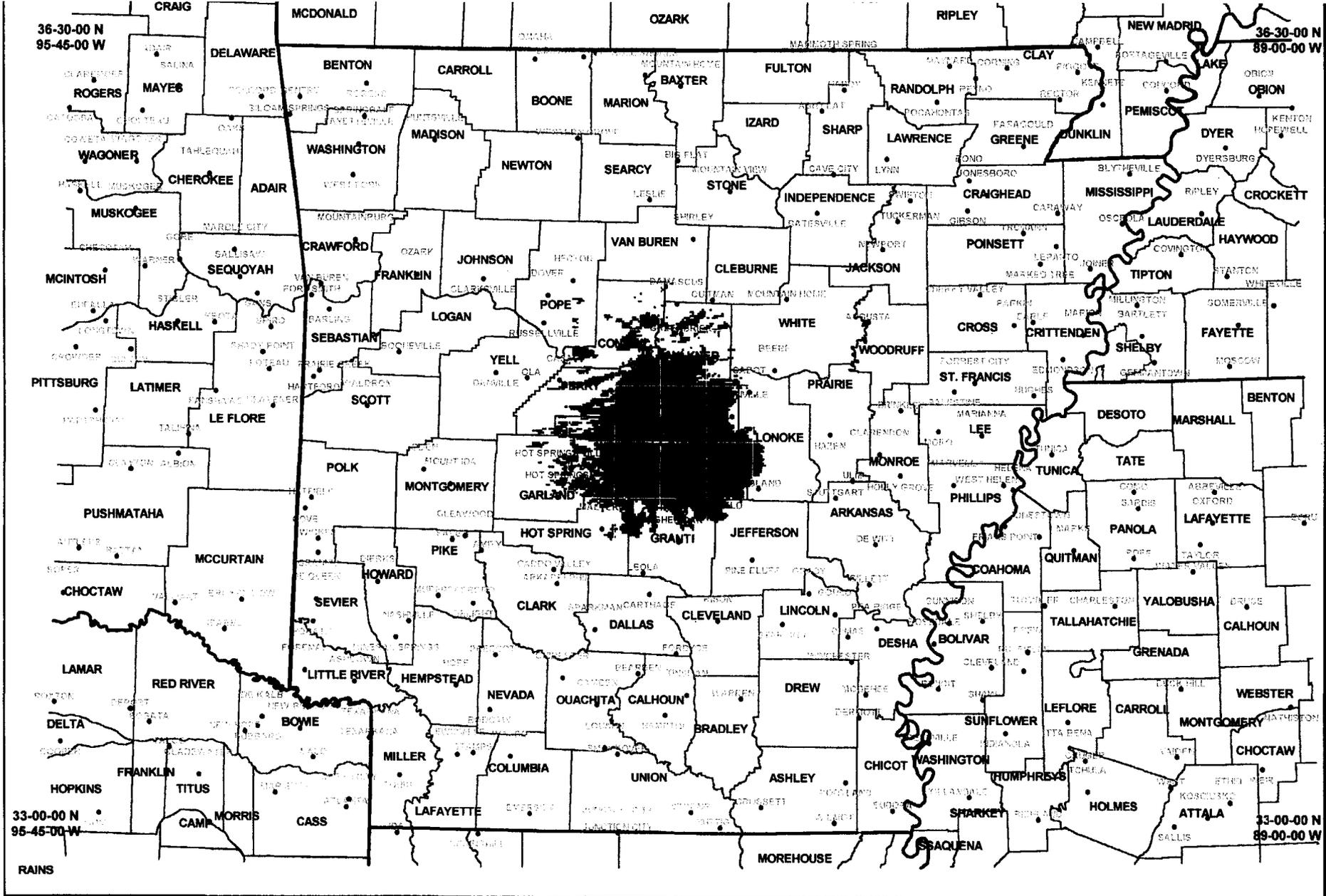
Prepared for: Arkansas Broadcasters December 10, 1998

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KARK LITTLE ROCK AR NTSC Channel 4
Grade B = Green Grade A = Red
Longley-Rice Analysis
L = 50%, T = 50%, C = 50%
Prepared for Arkansas Broadcasters
Prepared by TechWare, Inc. Chantilly, VA 703-222-5842





KARK LITTLE ROCK AR NTSC Channel 4
Grade B = Green Grade A = Red
Longley-Rice Analysis
L = 99%, T = 99%, C = 99%
Prepared for Arkansas Broadcasters
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KATV Channel 7 Little Rock, Arkansas

Longley-Rice Analysis

SERVICE	F(50/50/50) (Grade B)		F(50/50/50) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	1,025,287	48,862	812,613	27,662

	F(99/99/99) (Grade B)		F(99/99/99) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	533,907	9,506	25,246	849

F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)

F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)

Prepared for: Arkansas Broadcasters December 10, 1998

**Prepared by: TechWare, Inc.
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KTHV Channel 11 Little Rock, Arkansas

Longley-Rice Analysis

SERVICE	F(50/50/50) (Grade B)		F(50/50/50) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	989,777	43,147	795,857	25,260

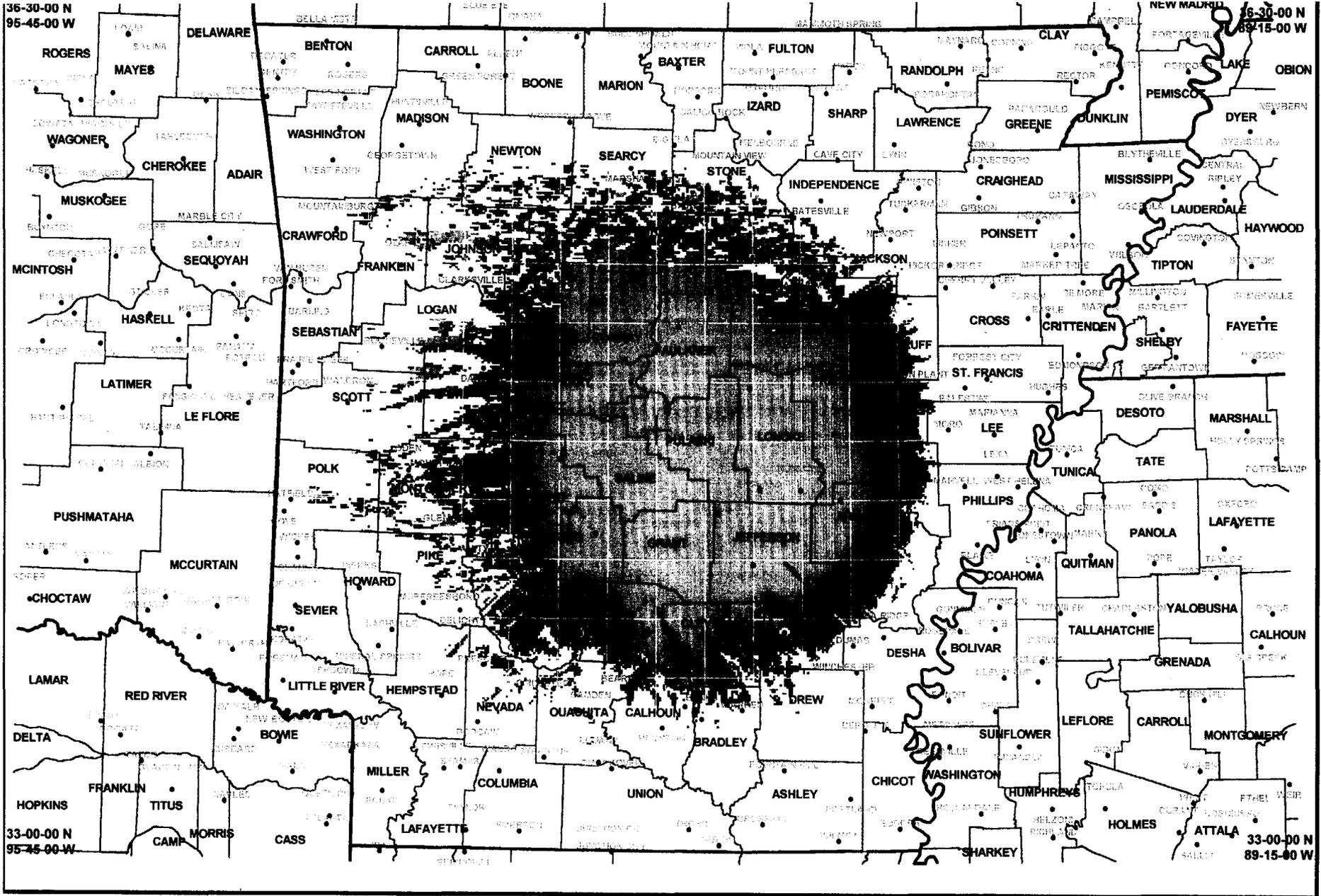
	F(99/99/99) (Grade B)		F(99/99/99) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	426,854	4,934	3,490	70

F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)

F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)

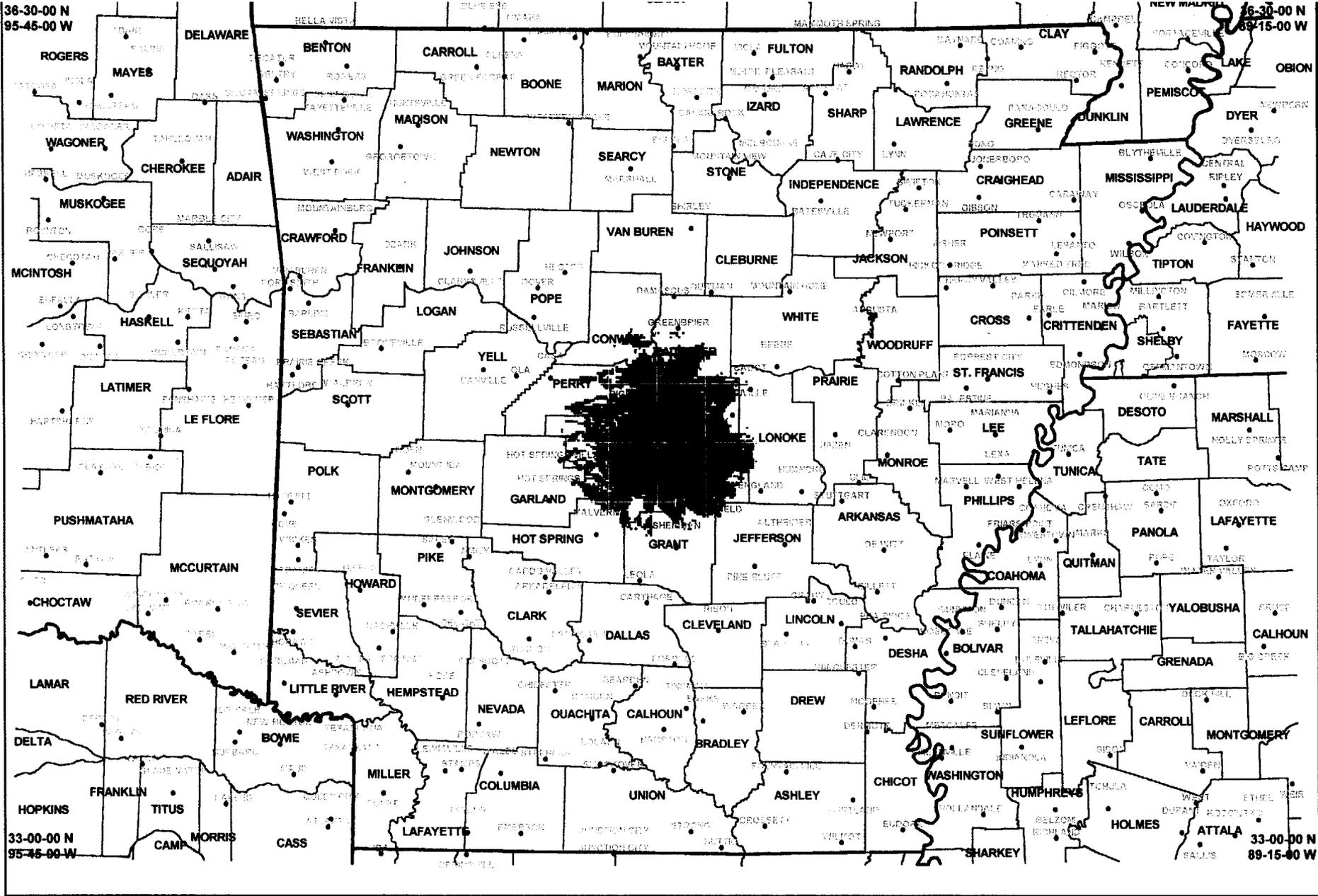
Prepared for: Arkansas Broadcasters December 10, 1998

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KTHV LITTLE ROCK AR NTSC Channel 11
Grade B = Green Grade A = Red
Longley-Rice Analysis
L = 50%, T = 50%, C = 50%
Prepared for Arkansas Broadcasters
Prepared by TechWare, Inc. Chantilly, VA 703-222-5842





KTHV LITTLE ROCK AR NTSC Channel 11

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 99%, T = 99%, C = 99%

Prepared for Arkansas Broadcasters

Prepared by TechWare, Inc. Chantilly, VA 703-222-5842

KLRT Channel 16 Little Rock, Arkansas

Longley-Rice Analysis

SERVICE	F(50/50/50) (Grade B)		F(50/50/50) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	977,175	41,226	830,712	29,481

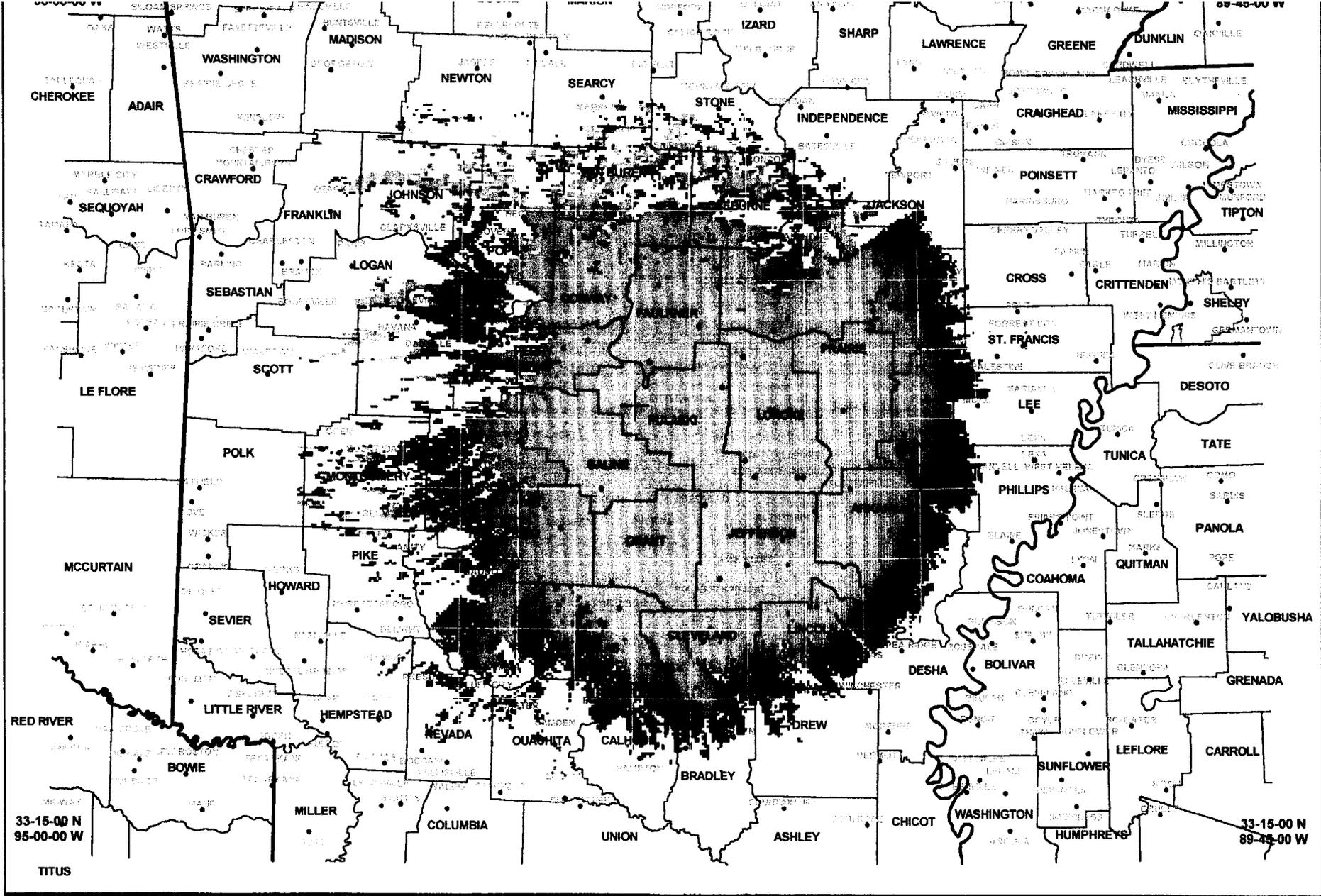
	F(99/99/99) (Grade B)		F(99/99/99) (Grade A)	
	Population	Area (Square km)	Population	Area (Square km)
Limited by Terrain	462,463	5,804	146,544	338

F(50/50/50) - Longley-Rice Location Variability (50%), Time Variability(50%), Confidence (50%)

F(99/99/99) - Longley-Rice Location Variability (99%), Time Variability(99%), Confidence (99%)

Prepared for: Arkansas Broadcasters December 10, 1998

**Prepared by: TechWare, Inc.
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14101 Parke Long Court
Chantilly, VA 20151
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KLRT Little Rock AR NTSC Channel 16

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 50%, T = 50%, C = 50%

Prepared for Arkansas Broadcasters

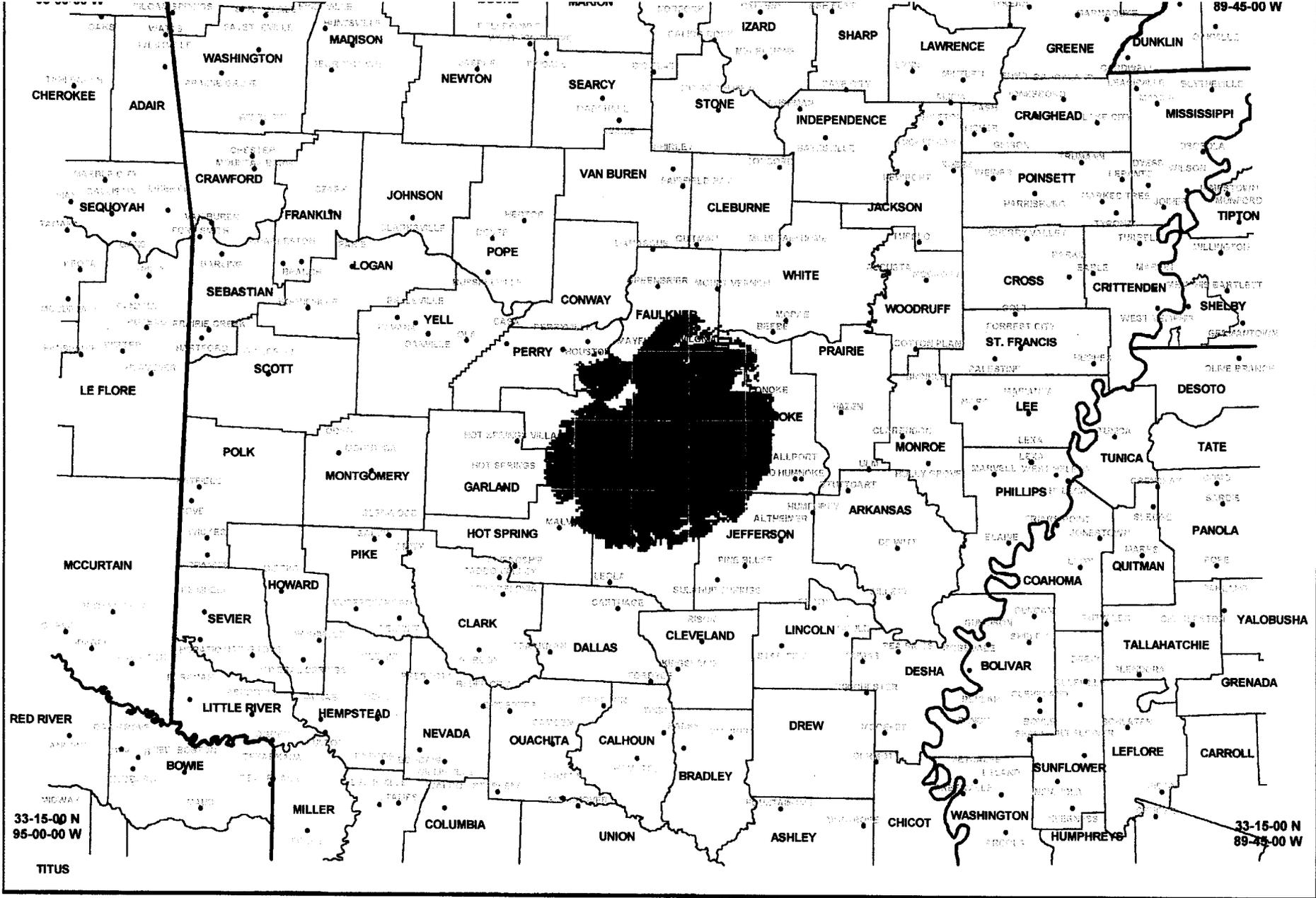
Prepared by TechWare, Inc. Chantilly, VA 703-222-5842



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KLRT LITTLE ROCK AR NTSC Channel 16

Grade B = Green Grade A = Red

Longley-Rice Analysis

L = 99%, T = 99%, C = 99%

Prepared for Arkansas Broadcasters

Prepared by TechWare, Inc. Chantilly, VA 703-222-5842