

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

FEB 8 2001

OFFICE OF
MANAGING DIRECTOR

Elizabeth E. Goldin
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

86-285

RE: Request for Reduction of Regulatory
Fees for Fiscal Year 2000
KBCB (TV)
Fee Control No. 0009218835200001
Fee Paid \$11,425.00

Dear Ms. Goldin:

This is in response to the request for reduction of regulatory fee for Fiscal Year (FY) 2000, filed on behalf of World Television of Washington, LLC (WTW), licensee of Channel 24, KBCB(TV), Bellingham, Washington. That request seeks a refund of \$10,275.00, which reflects the difference between the 2000 regulatory fee assessment (\$11,425.00) and the amount charged to UHF television stations (\$1,150.00) in the remaining market category (markets 101 and above).

The Commission has set standards for determining whether the regulatory fees for a television station may be reduced below the fees assessed for stations in the relevant Designated Market Area. *Implementation of Section 9 of the Communications Act, 10 FCC Rcd 12759, 12763 (1995)*. The Commission will reduce fees for television stations having certain characteristics. *Id.* Such a station may not be an affiliate of a major network, must be located outside the metropolitan area of the principal city in the assigned DMA, and may not provide a Grade B signal to a substantial portion of the assigned market's metropolitan areas. *Id.* Stations that meet these criteria and request fee reductions will be assessed regulatory fees based on the number of households they serve; stations that serve fewer television households than are in the top 100th market will be assessed the regulatory fee for remaining market stations. *Id.*

WTW argues that, although KBCB(TV) is listed as being within the Seattle-Tacoma, Washington DMA, good cause exists for reduction of its regulatory fee. In this regard, WTW states that KBCB(TV) is not a network affiliate, that it is not located within the Seattle-Tacoma metropolitan area, and that its Grade B signal, encompassing 79,600 television households, does not serve a substantial portion of the Seattle-Tacoma, Washington metropolitan area. Review of the *2000 Television & Cable Factbook* supports WTW's assertions and provides confirmation that KBCB(TV) should be treated as a remaining market station for purposes of its regulatory fee assessment. You should note, however, that WTW is under a continuing obligation to report to the Commission

Missing
Info
←

In light of the analysis set forth above, WTW's request for reduction of the regulatory fee for FY 2000 is granted and the excessive amount will be refunded. A check made payable to the maker of the original check, and drawn in the amount of \$10,275.00, will be provided at the earliest practicable time. If you have any questions concerning this letter, please call the Revenue & Receivable Operation Group at 418-1995.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Reger', written in a cursive style.

for Mark Reger
Chief Financial Officer

0009218835200001

Wiley, Rein & Fielding

COPY

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September 22, 2000

RECEIVED
SEP 22 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND

Office of the Managing Director
Federal Communications Commission
445 12th Street, S.W., Room 1-A625
Washington, DC 20554

Attn: Regulatory Fee Waiver/Reduction Request

**Re: Request for Reduction of Regulatory Fees
World Television of Washington, LLC
KBCB(TV), Bellingham, Washington (Facility ID #53586)**

Dear Sir or Madam:

On behalf of World Television of Washington, LLC ("WTW"), the licensee of KBCB(TV), Bellingham, Washington, we are submitting herewith, in triplicate, a request for reduction in regulatory fees for Fiscal Year 2000. As demonstrated by the attached, WTW requests a refund of \$10,275 from the \$11,425 submitted on September 19, 2000 for KBCB(TV).

If further information is required in connection with this request, please direct inquiries and correspondence to the undersigned.

Respectfully submitted,



Elizabeth E. Goldin

Enclosure
923133

21 September, 2000

Office of the Managing Director
Attn: Regulatory Fee Waiver/Reduction Request
Federal Communications Commission
445 12th Street, S.W.
Room 1-A625
Washington, D.C. 20554

Re: Request for Reduction in Regulatory Fees
World Television of Washington, LLC
KBCB, Channel 24, Bellingham, Washington

Dear Office of the Managing Director:

This request is filed by World Television of Washington, LLC ("WTW"), licensee of KBCB, Channel 24 at Bellingham, Washington, and is filed pursuant to "*FY 2000 Mass Media Regulatory Fees*," Public Notice 20318, August 2, 2000. Because of extraordinary and compelling circumstances, WTW requests a reduction in its regulatory fee.

The Seattle-Tacoma Designated Market Area ("DMA") is a Top 25 DMA and stations in this market are required to pay \$11,425 as their annual regulatory fee. The Seattle-Tacoma DMA includes 4,217,100 persons (BIA's Television Yearbook 2000).

In the Implementation of Section 9 of the Communications Act, Assessment and Collection of Regulatory Fees for the 1994 Fiscal Year, the Commission concluded that stations that "lack network affiliations, and are located outside of the principle city's metropolitan area and do not provide a grade B signal to a substantial portion of the market's metropolitan areas will be assessed a fee based on the number of television households served, and will be charged the same fee as stations serving markets with the same number of television households." 10 FCC Rcd 12759 (1995), paras. 21-22.

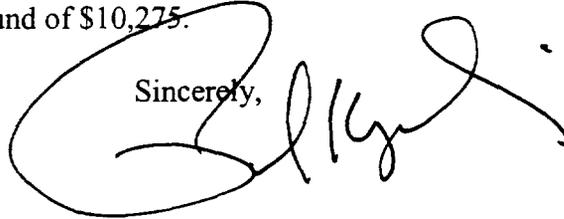
KBCB is licensed to Bellingham, Washington, which is in the far northern end of the Seattle-Tacoma DMA. Due to this location, the KBCB signal cannot be received over-the-air in either Seattle or Tacoma. In fact, as illustrated in the attached map of KBCB's Grade B contour, KBCB's Grade B service area can only be received by 211,000 people within the Seattle-Tacoma DMA. Attachment A. In other words, the KBCB over-the-air signal reaches a mere 5% of the Seattle-Tacoma DMA populace.

Additionally, KBCB is not a network affiliate. KBCB is predominately a foreign language broadcaster.

Accordingly, WTW believes that circumstances dictate that the KBCB regulatory fees be adjusted in accordance with the Implementation of Section 9 of the Communications Act, Assessment and Collection of Regulatory Fees for the 1994 Fiscal Year, 10 FCC Rcd 12759 (1995), paras. 21-22. As there are 2.65 persons per television household within the Seattle-Tacoma DMA and 79,600 television households within the Grade B service area of KBCB, the Licensee is effectively serving a market equivalent to DMA market size number 182 (which is currently Bowling Green, Kentucky). See BIA's Television Yearbook 2000 and Attachment A. Stations in markets 100 and higher pay a regulatory fee of \$1,150, which is \$10,275 more than what WTW paid on September 19, 2000.

We therefore request a refund of \$10,275.

Sincerely,

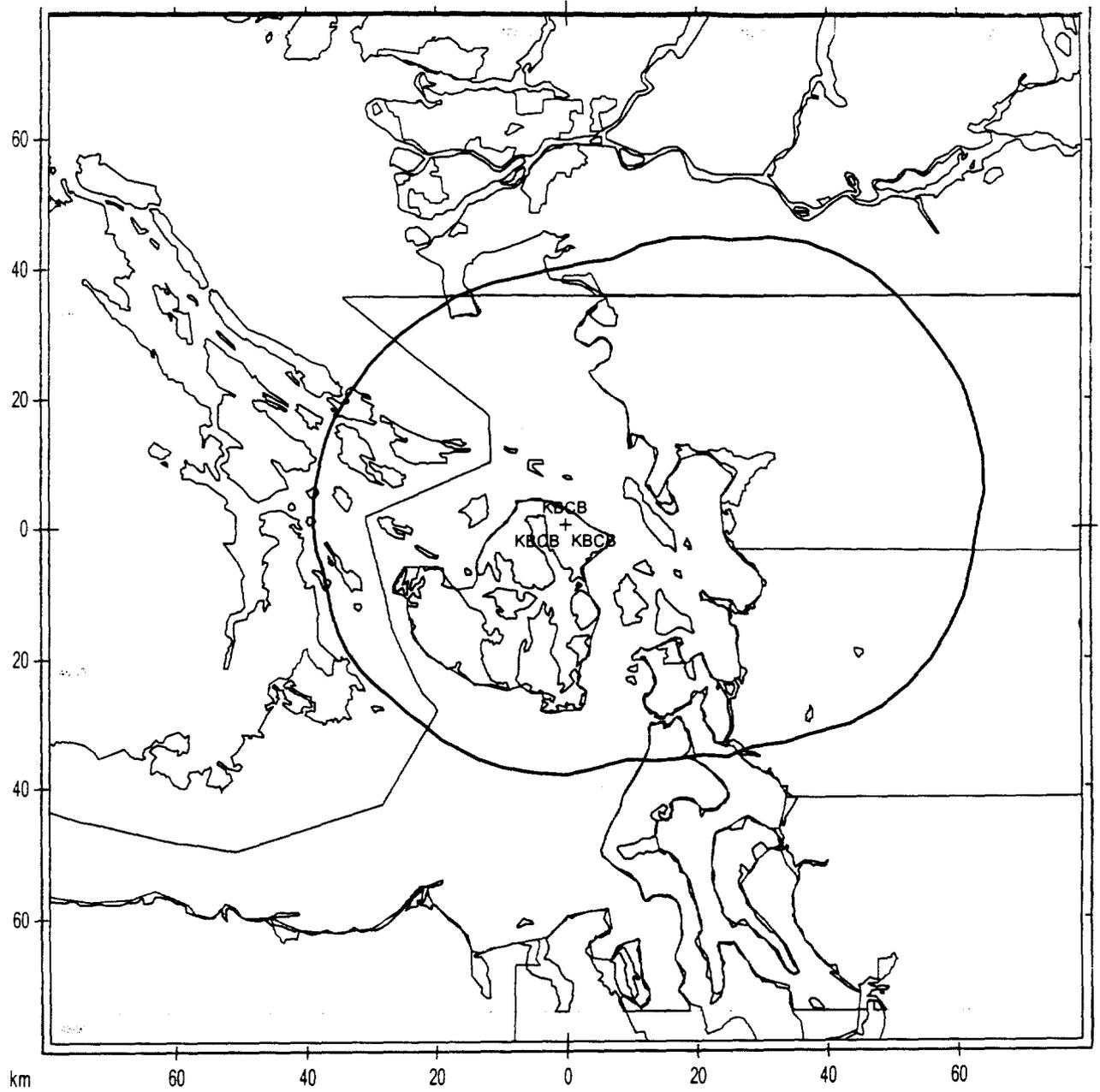
A handwritten signature in black ink, appearing to read "Paul Koplin", written over the word "Sincerely,".

Paul Koplin
President
World Television of Washington, LLC

Attachment

ATTACHMENT A

KBCB CHANNEL 24 BELLINGHAM WA 211,000 PERSONS



Map Footer

— National Borders — County Borders — City Borders — Lat/Lon Grid

Map Scale: 1:1000253 1 cm = 10.00 km V/H Size: 158.23 x 158.23 km