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May 29, 2003

Ex Parte Communication

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

*Re: MB Docket No. 02-277; MM Docket No. 01-317; MM Docket No. 00-244, Radio
Ownership Rules*

Dear Mr. Chairman:

Throughout this proceeding, NAB has argued that adoption of an Arbitron-based system for defining radio markets would result in far more anomalies and unpredictable or unjustified results than the current contour-based system.¹ The use of BIA data that the Commission is reported to be considering would not ameliorate these problems because BIA station counts are based on Arbitron Metros and the stations that Arbitron assigns to those Metros.

Many of these arbitrary results are, as NAB and others have pointed out, the result of manipulation of Metro borders by Arbitron subscribers. We are submitting today additional data that demonstrates further that Arbitron's decisions whether to assign particular stations to a Metro creates additional distortions. Moreover, these decisions may have the effect of altering adjacent rated and unrated markets.

We asked BIA Financial Network to examine each of the 286 rated markets and compare the number of stations that are licensed to communities in the counties in those Metros to the

¹ NAB Comments in MM Docket No. 00-244 (filed Feb. 26, 2001) at 15-24; NAB Comments in MM Docket No. 01-317 (filed March 27, 2002) at 35-36; NAB Comments in MB Docket No. 02-277 (filed Jan. 2, 2003) at 88-89.

number of stations that Arbitron assigns to those Metros. A spreadsheet showing that comparison is attached.

In only 35 of the 286 rated markets is the number of stations assigned by Arbitron to a market the same as the number of stations actually licensed to communities in that market.² *In the remaining 251 rated markets*, the actual number of stations licensed to communities in the Metro is different from the number of stations Arbitron assigns to those Metros.³

Some of these variations are quite large. In the Miami-Ft. Lauderdale-Hollywood Metro, for example, there are 14 stations licensed to counties in the Metro, but Arbitron assigns 55 stations to that market. By contrast, in Palm Springs, there are 40 stations licensed to communities in the Metro, but only 21 stations assigned to it by Arbitron. In many cases, these differences would cause a market to be placed into a different ownership category. In *100 markets*, calculating the number of stations actually licensed to a community in the Metro would result in the those markets being placed into a different ownership category than they would be by using the number of stations assigned to those Metros by Arbitron.

If the Commission's assumption has been that it can use Arbitron market assignments to establish consistent geographic markets for radio stations, these data show that assumption is unwarranted. The geographic lines of an Arbitron Metro do not determine which stations are included in or excluded from that market. Instead, Arbitron markets are a "crazy quilt" of decisions by a ratings service to meet customer needs by moving stations in and out of markets, the boundaries of which are already subject to station-driven modification. Adoption of those definitions as a regulatory tool would result in an entirely arbitrary market definition.

These distortions would not be cured even if the Commission were to use the count of stations actually licensed to counties in a Metro to define markets. Stations may be licensed to a community near the edge of a county in a Metro, but provide coverage to very little of that Metro. Indeed, a station might be licensed to a community in a Metro, but locate its transmitter outside the Metro or *vice versa*. In geographically large Metros,⁴ owners may have lower-powered stations at different ends of the Metro that do not overlap each other and perhaps do not even provide coverage to the population center of the Metro. These stations would all be included in an Arbitron-based market count even though they do not overlap with each other at all and thus do not compete for advertisers or listeners.⁵

² In the 100 largest markets, there are only five markets where the Arbitron count is the same as the actual count.

³ Even in the 35 Metros where the actual station count is the same as the Arbitron station count, the identity of the stations Arbitron assigns to those markets may be quite different from the identity of the stations licensed to communities in those markets.

⁴ The Flagstaff-Prescott Metro covers almost 27,000 square miles, and there are a number of Metros that are over 8,000 square miles.

⁵ A particular example of this phenomenon occurs with embedded markets where the "true" station count and the Arbitron station count may vary widely.

By contrast, the contour-based system that the Commission has used since 1992 recognizes that stations compete for advertisers and listeners with the other stations whose signals serve the same population. A contour-based system effectively separates stations that serve core population centers from those that serve outlying areas. Using contours also reflects the impact of changes in transmitter locations even when a station has not changed its community of license. It would be arbitrary and capricious for the Commission to abandon the contour system that takes into account the many variations among radio stations in favor of a supposed geographic market definition that does not.

It is important also to recognize that the inclusion or exclusion of stations from Metros affects adjacent areas as well. If a station physically licensed to one Metro is assigned to another, it will affect the station counts in both markets.

Even more troubling is Arbitron's apparent practice of including in some Metro counts stations that are licensed to counties outside of any rated market. If the Commission elects to use one or another non-radio market definition for stations in unrated markets, it is likely that some stations could be counted twice – once in the unrated market that includes their community of license, and again in the rated market to which they were assigned by Arbitron. The fact that Arbitron does not treat consistently stations that are licensed to communities outside of rated markets is yet another reason why the Commission – even if it concludes that it should adopt some Arbitron-based system for rated markets – should avoid the disruption and uncertainty that would be created if it were to were to adopt a non-radio market definition for stations outside of rated markets. Instead, as the NAB Radio Board suggested last week, station contours should continue to be used to determine radio markets in those areas.

The data we are submitting today show once again that an Arbitron-based market definition would result in far more distortions and anomalies than the present contour-based system. Given that there are readily available means to address the anomalies that are claimed to

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result from the contour-based system,⁶ the Commission has no adequate justification for abandoning that system in favor of the erratic application of Arbitron market assignments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jell W. Bader". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

Attachment

cc: The Honorable Kathleen Q. Abernathy
The Honorable Michael J. Copps
The Honorable Kevin J. Martin
The Honorable Jonathan S. Adelstein
Kenneth Ferree
Paul Gallant
Nandan Joshi

⁶ See Letter from Edward O. Fritts to Chairman Michael Powell, May 23, 2003.

**Summary of Comparison Between True Physical Location
and Arbitron Assigned Counts of Stations**

Arbitron Counts

		Less than 15	15-24	25-34	35-44	45+
True Physical Location Counts	Less than 15	33	31	0	0	1
	15-24	9	66	17	1	0
	25-34	0	6	31	15	1
	35-44	3	3	0	24	8
	45+	0	1	1	3	30

Rank	Market	Counties in Market	True Comm	True NonComm	Total True Stations	Arbitron Comm	Arbitron NonComm	Total Arbitron Stns.
1	New York, NY	20	169	86	255	42	18	60
2	Los Angeles, CA	2	68	15	83	74	15	89
3	Chicago, IL	11	85	38	123	89	38	127
4	San Francisco, CA	9	106	38	144	47	18	65
5	Dallas-Ft. Worth, TX	11	58	12	70	64	12	76
6	Philadelphia, PA	8	41	24	65	42	24	66
7	Houston-Galveston, TX	8	49	13	62	57	13	70
8	Washington, DC	16	59	10	69	47	6	53
9	Boston, MA	7	69	29	98	62	27	89
10	Detroit, MI	7	41	17	58	43	20	63
11	Atlanta, GA	20	62	12	74	71	12	83
12	Miami-Ft. Lauderdale-Hollywood, FL	2	12	2	14	46	9	55
14	Seattle-Tacoma, WA	6	53	17	70	55	17	72
15	Phoenix, AZ	1	41	6	47	46	6	52
16	Minneapolis-St. Paul, MN	13	39	12	51	44	12	56
17	San Diego, CA	1	28	3	31	46	3	49
18	Nassau-Suffolk, NY	2	58	24	82	26	12	38
19	Baltimore, MD	7	33	5	38	31	5	36
20	St. Louis, MO	12	50	17	67	52	17	69
21	Tampa-St. Petersburg-Clearwater, FL	4	37	6	43	42	6	48
22	Denver-Boulder, CO	6	39	9	48	41	9	50
23	Pittsburgh, PA	6	51	12	63	52	12	64
24	Portland, OR	6	42	11	53	44	11	55
25	Cleveland, OH	5	30	10	40	30	10	40
26	Cincinnati, OH	13	34	12	46	33	12	45
27	Sacramento, CA	5	37	11	48	39	11	50
28	Riverside-San Bernardino, CA	2	52	26	78	26	13	39
29	Kansas City, MO-KS	10	36	6	42	38	6	44
30	San Jose, CA	1	34	14	48	15	7	22
31	San Antonio, TX	8	42	7	49	43	7	50
32	Salt Lake City-Ogden-Provo, UT	5	43	12	55	50	12	62
33	Milwaukee-Racine, WI	5	33	10	43	34	10	44
34	Providence-Warwick-Pawtucket, RI	6	33	10	43	29	10	39
35	Columbus, OH	7	32	9	41	34	9	43
36	Middlesex-Somerset-Union, NJ	3	10	6	16	6	3	9
37	Charlotte-Gastonia-Rock Hill, NC-SC	7	36	7	43	41	7	48
38	Orlando, FL	3	25	5	30	34	5	39
39	Las Vegas, NV	1	30	4	34	34	4	38
40	Norfolk-Virginia Beach-Newport News, VA	12	32	9	41	37	9	46
41	Indianapolis, IN	8	28	10	38	29	10	39
42	Austin, TX	5	29	8	37	31	9	40
43	Greensboro-Winston Salem-High Point, NC	8	39	11	50	40	11	51
44	New Orleans, LA	6	29	5	34	35	5	40
45	Nashville, TN	8	44	14	58	48	14	62
46	Raleigh-Durham, NC	6	30	7	37	39	7	46
47	West Palm Beach-Boca Raton, FL	1	22	4	26	26	4	30
48	Memphis, TN	7	39	11	50	41	11	52
49	Hartford-New Britain-Middletown, CT	5	36	17	53	25	12	37
50	Jacksonville, FL	5	34	9	43	36	9	45
51	Buffalo-Niagara Falls, NY	2	23	5	28	27	5	32
52	Monmouth-Ocean, NJ	2	18	14	32	13	9	22
53	Oklahoma City, OK	6	27	7	34	32	7	39
54	Rochester, NY	6	33	15	48	36	15	51
55	Louisville, KY	8	34	6	40	37	6	43
56	Richmond, VA	13	29	6	35	31	6	37
57	Birmingham, AL	5	43	8	51	39	7	46
58	Dayton, OH	5	17	11	28	28	11	39
59	Greenville-Spartanburg, SC	4	33	7	40	39	7	46
60	Westchester, NY	1	16	8	24	7	4	11
61	Honolulu, HI	1	33	4	37	33	4	37
62	Tucson, AZ	1	26	5	31	28	5	33
63	McAllen-Brownsville-Harlingen, TX	2	22	6	28	26	6	32
64	Albany-Schenectady-Troy, NY	6	36	10	46	45	10	55

Rank	Market	Counties in Market	True Comm	True NonComm	Total True Stations	Arbitron Comm	Arbitron NonComm	Total Arbitron Stns.
65	Tulsa, OK	6	29	3	32	35	3	38
66	Grand Rapids, MI	2	26	9	35	28	11	39
67	Ft. Myers-Naples-Marco Island, FL	2	29	6	35	33	6	39
68	Fresno, CA	1	29	8	37	42	8	50
69	Wilkes Barre-Scranton, PA	5	38	11	49	39	11	50
70	Allentown-Bethlehem, PA	4	17	7	24	17	7	24
71	Albuquerque, NM	3	29	6	35	38	6	44
72	Knoxville, TN	6	36	7	43	39	7	46
73	Akron, OH	2	8	4	12	9	4	13
74	Omaha-Council Bluffs, NE-IA	4	18	7	25	23	7	30
75	Monterey-Salinas-Santa Cruz, CA	2	34	9	43	35	9	44
76	Wilmington, DE	3	11	5	16	13	5	18
77	Sarasota-Bradenton, FL	2	15	4	19	13	4	17
78	El Paso, TX	1	19	3	22	33	3	36
79	Harrisburg-Lebanon-Carlisle, PA	4	22	7	29	24	7	31
80	Syracuse, NY	3	29	10	39	31	10	41
81	Springfield, MA	2	16	11	27	19	11	30
82	Toledo, OH	3	17	8	25	27	8	35
83	Baton Rouge, LA	4	15	5	20	22	5	27
84	Greenville-New Bern-Jacksonville, NC	9	38	7	45	41	7	48
85	Little Rock, AR	4	32	5	37	38	6	44
86	Gainesville-Ocala, FL	4	28	7	35	31	7	38
87	Bakersfield, CA	1	32	5	37	32	5	37
88	Stockton, CA	1	10	2	12	9	2	11
89	Charleston, SC	3	28	4	32	29	4	33
90	Columbia, SC	2	19	4	23	23	4	27
91	Des Moines, IA	4	20	8	28	25	8	33
92	Spokane, WA	2	27	7	34	28	7	35
93	Mobile, AL	2	24	2	26	26	2	28
94	Daytona Beach, FL	2	13	5	18	11	5	16
95	Wichita, KS	3	20	6	26	26	6	32
96	Colorado Springs, CO	1	17	4	21	22	4	26
97	Madison, WI	3	22	7	29	29	7	36
98	Lakeland-Winter Haven, FL	1	11	4	15	11	4	15
99	Melbourne-Titusville-Cocoa, FL	1	16	5	21	14	5	19
100	Lafayette, LA	6	27	2	29	29	2	31
101	Johnson City-Kingsport-Bristol, TN-VA	8	30	6	36	34	6	40
102	Lexington-Fayette, KY	7	25	4	29	31	4	35
103	Ft. Wayne, IN	6	23	6	29	26	6	32
104	Visalia-Tulare-Hanford, CA	2	22	3	25	13	3	16
105	Chattanooga, TN	6	35	7	42	31	5	36
106	York, PA	2	12	3	15	11	3	14
107	Santa Rosa, CA	1	26	6	32	15	3	18
108	New Haven, CT	2	25	16	41	7	4	11
109	Augusta, GA	5	25	4	29	30	4	34
110	Roanoke-Lynchburg, VA	10	36	5	41	36	6	42
111	Ft. Pierce-Stuart-Vero Beach, FL	3	20	4	24	15	4	19
112	Youngstown-Warren, OH	2	14	3	17	23	3	26
113	Morristown, NJ	1	8	4	12	4	2	6
114	Worcester, MA	1	22	16	38	11	8	19
115	Lancaster, PA	1	8	5	13	8	5	13
116	Portsmouth-Dover-Rochester, NH	3	20	5	25	16	3	19
117	Bridgeport, CT	2	22	16	38	6	4	10
118	Huntsville, AL	3	24	4	28	28	4	32
119	Oxnard-Ventura, CA	1	15	4	19	15	4	19
120	Lansing-East Lansing, MI	3	15	7	22	17	7	24
121	Boise, ID	2	20	4	24	27	4	31
122	Modesto, CA	1	14	5	19	20	5	25
123	Jackson, MS	3	25	3	28	33	3	36
124	Pensacola, FL	2	17	4	21	18	4	22
125	Flint, MI	1	11	2	13	16	2	18
126	Ft. Collins-Greeley, CO	2	15	2	17	15	2	17
127	Fayetteville, NC	2	16	2	18	25	2	27

Rank	Market	Counties in Market	True Comm	True NonComm	Total True Stations	Arbitron Comm	Arbitron NonComm	Total Arbitron Stns.
128	Reno, NV	2	24	2	26	28	2	30
129	Canton, OH	2	10	1	11	10	1	11
130	Saginaw-Bay City-Midland, MI	3	19	5	24	20	5	25
131	Beaumont-Port Arthur, TX	3	20	3	23	16	3	19
132	Shreveport, LA	3	22	2	24	25	2	27
133	Reading, PA	1	5	1	6	5	1	6
134	Corpus Christi, TX	2	24	5	29	31	5	36
135	Victor Valley, CA	1	54		54	28		28
136	Biloxi-Gulfport-Pascagoula, MS	3	17	2	19	19	2	21
137	Appleton-Oshkosh, WI	3	16	4	20	17	4	21
138	Atlantic City-Cape May, NJ	2	24	7	31	24	7	31
139	Burlington-Plattsburgh, VT-NY	6	24	9	33	30	9	39
140	Trenton, NJ	1	10	4	14	9	4	13
141	Quad Cities, IA-IL	3	14	5	19	18	5	23
142	Stamford-Norwalk, CT	1	24	16	40	6	4	10
143	Peoria, IL	3	17	3	20	19	3	22
144	Springfield, MO	3	19	5	24	22	5	27
145	Eugene-Springfield, OR	1	20	9	29	22	9	31
146	Ann Arbor, MI	1	7	3	10	7	3	10
147	Tyler-Longview, TX	3	21	4	25	31	5	36
148	Salisbury-Ocean City, MD	4	34	4	38	37	4	41
149	Newburgh-Middletown, NY	1	8	4	12	10	4	14
150	Montgomery, AL	3	16	3	19	20	3	23
151	Fayetteville, AR	2	18	6	24	20	6	26
152	Huntington-Ashland, WV-KY	6	20	5	25	23	5	28
153	Rockford, IL	2	10	3	13	11	4	15
154	Macon, GA	4	19	3	22	25	3	28
155	Killeen-Temple, TX	2	10	3	13	10	3	13
156	Flagstaff-Prescott, AZ	2	30	9	39	30	9	39
157	Evansville, IN	4	18	4	22	20	4	24
158	Savannah, GA	3	13	5	18	21	5	26
159	Utica-Rome, NY	2	23	7	30	23	7	30
160	Asheville, NC	3	12	8	20	14	8	22
161	Tallahassee, FL	2	13	4	17	20	4	24
162	Palm Springs, CA	1	40		40	21		21
163	Poughkeepsie, NY	1	10	2	12	19	2	21
164	Erie, PA	1	14	5	19	14	5	19
165	Portland, ME	1	15	5	20	23	5	28
166	Fredericksburg, VA	6	10	1	11	10	1	11
167	Myrtle Beach, SC	2	25	3	28	26	3	29
168	Wausau-Stevens Point, WI	3	18	7	25	19	7	26
169	Hagerstown-Chambersburg-Waynesboro, MD-PA	2	14	2	16	16	2	18
170	San Luis Obispo, CA	1	22	5	27	22	5	27
171	South Bend, IN	1	10	3	13	21	3	24
172	New Bedford-Fall River, MA	1	12	4	16	6	2	8
173	New London, CT	1	9	2	11	11	2	13
174	Ft. Smith, AR	4	23	2	25	23	2	25
175	Anchorage, AK	1	21	5	26	25	5	30
176	Lincoln, NE	1	9	4	13	12	4	16
177	Charleston, WV	2	17	2	19	17	2	19
178	Wilmington, NC	2	18	3	21	19	3	22
179	Binghamton, NY	2	16	5	21	17	5	22
180	Lubbock, TX	1	16	4	20	20	4	24
181	Columbus, GA	3	11	3	14	18	3	21
182	Kalamazoo, MI	1	9	4	13	14	4	18
183	Cape Cod, MA	1	10	7	17	12	7	19
184	Johnstown, PA	2	20	3	23	20	3	23
185	Tupelo, MS	7	19	4	23	26	4	30
186	Manchester, NH	3	27	7	34	17	6	23
187	Green Bay, WI	1	8	4	12	12	4	16
188	Odessa-Midland, TX	2	16	5	21	23	5	28
189	Merced, CA	2	16	3	19	16	3	19
190	Topeka, KS	5	10	2	12	13	2	15

Rank	Market	Counties in Market	True Comm	True NonComm	Total True Stations	Arbitron Comm	Arbitron NonComm	Total Arbitron Stns.
191	Dothan, AL	5	23	5	28	24	5	29
192	Traverse City-Petoskey, MI	7	22	7	29	34	7	41
193	Amarillo, TX	2	18	7	25	21	7	28
194	Waco, TX	1	10	1	11	13	1	14
195	Chico, CA	1	11	4	15	17	4	21
196	Morgantown-Clarksburg-Fairmont, WV	3	21	4	25	23	4	27
197	Danbury, CT	2	20	14	34	7	4	11
198	Yakima, WA	1	18	7	25	19	7	26
199	Santa Barbara, CA	1	30	6	36	15	3	18
200	Terre Haute, IN	6	17	4	21	20	4	24
201	Muncie-Marion, IN	3	9	5	14	12	5	17
202	Duluth-Superior, MN-WI	3	18	10	28	21	10	31
203	Frederick, MD	1	14	4	18	6	2	8
204	Clarksville-Hopkinsville, TN-KY	2	10	2	12	10	2	12
205	Santa Maria-Lompoc, CA	1	30		30	15		15
206	Springfield, IL	2	8	5	13	14	5	19
207	Olean, NY	4	16	8	24	16	8	24
208	Bowling Green, KY	6	18	4	22	18	4	22
209	Cedar Rapids, IA	1	8	3	11	11	3	14
210	Florence, SC	2	14	1	15	21	1	22
211	Richland-Kennewick-Pasco, WA	2	14	4	18	20	5	25
212	Medford-Ashland, OR	1	14	7	21	16	7	23
213	Elmira-Corning, NY	2	20	6	26	23	6	29
214	Bangor, ME	2	15	5	20	19	5	24
215	Laredo, TX	1	8	2	10	8	2	10
216	Champaign, IL	1	12	6	18	14	6	20
217	Alexandria, LA	3	16	5	21	17	5	22
218	Lake Charles, LA	1	9	2	11	13	2	15
219	Ft. Walton Beach, FL	1	13	2	15	14	2	16
220	Fargo-Moorhead, ND-MN	2	12	6	18	14	6	20
221	Blacksburg-Christiansburg-Radford-Pulaski	5	13	4	17	12	4	16
222	St. Cloud, MN	3	16	4	20	17	4	21
223	Laurel-Hattiesburg, MS	3	14	3	17	18	3	21
224	Charlottesville, VA	4	11	5	16	12	5	17
225	Muskegon, MI	1	13	3	16	13	1	14
226	Winchester, VA	5	13	2	15	12	2	14
227	Redding, CA	1	15	3	18	16	4	20
228	Tuscaloosa, AL	1	9	2	11	14	2	16
229	Rochester, MN	3	12	4	16	15	4	19
230	Bryan-College Station, TX	1	8	2	10	15	2	17
231	Marion-Carbondale, IL	3	15	3	18	17	3	20
232	Abilene, TX	3	16	4	20	19	4	23
233	Dubuque, IA	3	16	2	18	16	2	18
234	Joplin, MO	2	13	4	17	18	4	22
235	Lafayette, IN	1	7	4	11	13	4	17
236	Bloomington, IL	1	6	2	8	7	2	9
237	Panama City, FL	1	14	4	18	16	4	20
238	Wheeling, WV	3	13	3	16	15	3	18
239	Santa Fe, NM	2	14	1	15	9	1	10
240	Waterloo-Cedar Falls, IA	2	11	6	17	16	6	22
241	Parkersburg-Marietta, WV-OH	2	12	5	17	16	5	21
242	Lima, OH	2	9	5	14	12	5	17
243	Eau Claire, WI	2	12	3	15	18	3	21
244	Meadville-Franklin, PA	2	13	2	15	13	2	15
245	Florence-Muscle Shoals, AL	2	13	3	16	15	3	18
246	State College, PA	1	12	3	15	12	3	15
247	Pueblo, CO	1	12	4	16	8	4	12
248	Elizabeth City-Nags Head, NC	9	20	4	24	19	4	23
249	Sussex, NJ	1	3	1	4	4	1	5
250	Monroe, LA	1	11	3	14	21	3	24
251	Wichita Falls, TX	2	8	3	11	8	3	11
252	Columbia, MO	1	7	4	11	16	5	21
253	Battle Creek, MI	1	6	1	7	5	1	6

Rank	Market	Counties in Market	True Comm	True NonComm	Total True Stations	Arbitron Comm	Arbitron NonComm	Total Arbitron Stns.
254	Texarkana, TX-AR	2	14	2	16	17	2	19
255	Altoona, PA	1	12		12	16		16
256	Billings, MT	1	18	2	20	19	2	21
257	Columbus-Starkville-West Point, MS	3	13	3	16	15	3	18
258	Grand Junction, CO	1	9	6	15	14	6	20
259	Williamsport, PA	1	12	2	14	15	5	20
260	Augusta-Waterville, ME	1	9	2	11	17	2	19
261	Sioux City, IA	2	8	3	11	15	3	18
262	Albany, GA	2	9	2	11	18	2	20
263	Harrisonburg, VA	2	10	3	13	17	3	20
264	Mankato-New Ulm-St Peter, MN	3	11	3	14	12	3	15
265	Sheboygan, WI	1	6	1	7	7	1	8
266	Decatur, IL	1	8	2	10	10	2	12
267	Rapid City, SD	2	13	3	16	17	3	20
268	Lawton, OK	1	8	3	11	10	3	13
269	Bluefield, WV	2	16	1	17	16	1	17
270	Watertown, NY	1	8	4	12	9	4	13
271	Lewiston-Auburn, ME	1	5	1	6	2	1	3
272	San Angelo, TX	1	10	3	13	12	3	15
273	Ithaca, NY	1	6	2	8	8	2	10
274	Sebring, FL	1	6		6	6		6
275	Cookeville, TN	3	10	3	13	10	3	13
276	Grand Forks, ND-MN	2	12	3	15	15	3	18
277	Bismarck, ND	2	11	1	12	11	1	12
278	Jackson, TN	1	6	2	8	14	2	16
279	Jonesboro, AR	1	6	2	8	8	4	12
280	Cheyenne, WY	1	12		12	15		15
281	Mason City, IA	4	11	3	14	13	3	16
282	Beckley, WV	1	5	1	6	9	1	10
283	Great Falls, MT	1	11	2	13	13	2	15
284	Meridian, MS	1	9	1	10	15	1	16
285	Brunswick, GA	1	8	2	10	9	2	11
286	Casper, WY	1	12	1	13	12	1	13