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June 9, 2006

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VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington D.C. 20554

Re: *Carriage of Digital Television Broadcast Signals: Amendments to Part 76 of the Commission's Rules*, CS Docket No. 98-120.

Dear Ms. Dortch:

This notice is to inform you that on June 8, 2006, Jane E. Mago, Senior Vice President & General Counsel of the National Association of Broadcasters, and the undersigned, of Wiley Rein & Fielding LLP, had an *ex parte* meeting with Sam Feder, Matthew Berry, Joel Kaufman, Susan Aaron, and William Scher, all of the Office of General Counsel.

We discussed the engineering, policy, and legal issues surrounding the Commission's reconsideration of its most recent decision in this docket regarding carriage protections for multicast programming. The enclosed documents were also distributed.

In addition, we would like to take this opportunity to submit updated information regarding cable revenue from local advertising, which was also discussed. As the attached chart from NCTA's web page shows, such revenue has consistently risen from 1992 to 2006, and from 1992 to 2006 the percentage increase in that revenue is 536%.

Respectfully submitted,

Helgi C. Walker

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Enclosures

National Association of
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June 8, 2006

The Honorable Kevin J. Martin
The Honorable Michael J. Copps
The Honorable Jonathan S. Adelstein
The Honorable Deborah Taylor Tate
The Honorable Robert M. McDowell
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Carriage of Digital Television Broadcast Signals*, CS Docket No. 98-120

Dear Mr. Chairman and Commissioners:

As the Commission considers the carriage of local television broadcasters' digital signals, NAB again urges you to adopt rules restricting cable operators from stripping out portions of local broadcasters' free over-the-air programming, including multicast streams. To emphasize the importance of the Commission ensuring the carriage of all free over-the-air programming, NAB is submitting for the record the attached survey of local broadcast stations' multicasting plans, as well as very recent data on the number of multicasting stations and their ability to obtain carriage on cable systems. As the enclosed information clearly shows, local broadcasters are continuing to experience significant difficulties obtaining cable carriage for their multicast programming channels, even though they are offering locally-oriented programming that clearly serves the public interest. In fact, according to Decisionmark data, only about *nine percent* of local broadcasters' multicast channels (excluding the multicast channels of PBS stations) currently receive cable carriage.

In the attached NAB survey of full-power commercial television stations, 85 percent of the responding stations that were currently multicasting or planning to multicast expected some or all of their future multicast programming to be locally produced or locally focused. As shown by the enclosed verbatim responses to this survey, the local programming these stations planned to offer includes: news and sports (including hyper-local news for individual counties); public affairs, such as coverage of community and state government; weather and weather emergencies; Spanish, other foreign language and other minority-oriented programming; religious; coverage of

college and high school events; and coverage of community events and activities. Clearly, this wide array of locally-oriented programming would serve the interests of viewers in communities throughout the country.

Moreover, this survey showed that these ambitious multicasting plans were unlikely to reach fruition if stations' multicast services were not carried by local cable systems. Nearly 80 percent (79.2 percent) of stations currently multicasting or planning to multicast stated that they were extremely unlikely or unlikely to provide multicast services in the future if those services were not carried by the major local cable systems. As shown in more detail in their verbatim responses, broadcasters responding to our survey stressed that their advertising-supported multicast services would not be financially viable without cable carriage because these services would not reach the majority of viewers in their markets.

A very recent review of Decisionmark data, an independent media technology software and information firm, proves that broadcasters' concerns about cable carriage were well founded. As of June 6, 2006, 696 digital television stations in 177 different Designated Market Areas were offering a total of 1,224 multicast channels, in addition to their main digital channels that often replicate the programming on their single analog channel. Relying on the best available data, Decisionmark reported that only approximately 16 percent of these 1,224 digital multicast channels receive carriage on at least one cable system. And if PBS stations are eliminated from consideration, only about nine percent of the non-PBS multicast channels currently receive carriage on any cable system in their respective markets. Thus, cable systems are declining to carry the vast majority of commercial broadcasters' multicast channels, which, according to Decisionmark data, include a number of channels carrying local news and sports.

Given the complaints NAB has heard from broadcasters attempting to negotiate for carriage of multicast program streams, it is hardly surprising that approximately only nine percent of commercial stations' multicast channels receive cable carriage today. For example, a station responding to NAB's earlier survey about multicast plans stated that the "dominant local cable MSO requests 'veto rights' over anything that we would carry on a digital multichannel that 'they consider' to be competitive, such as news, weather, sports, local auction channels, etc." Broadcasters have reported a number of other examples of cable operators seeking unreasonable restrictions on multicast carriage. For example, it is not uncommon for cable operators to refuse to carry multicast streams based on arbitrary content restrictions, such as bans on religious programming. Large cable operators also specify that they will carry only one or two, rather than all, the multicast streams of local broadcast network affiliates and insist that even that these limited multicast streams consist of certain specified programming (such as the programming of one of the new networks to be launched in the fall of 2006). In one particularly egregious case, a top-10 cable operator has demanded that it will carry only one multicast stream of a network

affiliate provided that: (i) it is a local weather channel; (ii) the stream contains no advertising with messages that "are negative against the cable industry or [the MSO], or portray the cable industry or [the MSO] unfavorably"; and (iii) the stream contains no advertising that is competitive to services offered by the MSO, even if they do not relate to video services.

In light of local broadcasters' current offerings of multicast channels and their clear interest in expanding these locally-oriented multicast services, NAB urges the Commission to ensure the cable carriage of all free over-the-air digital programming aired by local broadcast stations. Continuing to allow cable operators freely to strip out portions of broadcast stations' programming only serves the anti-competitive interests of the cable industry—not the interests of television viewers.

Please let me know what NAB can do to assist the Commission in its consideration of these or other matters of concern to local, free over-the-air broadcasters.

Best wishes.

Sincerely,

David K. Rehr

Attachments

Digital Multicast Carriage Advances The Governmental Interests Supporting Must Carry

Carriage of multicast broadcast signals is not only consistent with Congress' objectives but is also required by the must-carry statute. Further, the record before the Commission, and subsequent developments, provide ample support for the agency to conclude that requiring carriage of all non-subscription portions of a digital television signal would be consistent with, and indeed strongly advance, the governmental interests that support must carry.

- **The Cable Act Requires Carriage of all Non-Subscription Portions of a DTV Signal**
  - Section 614(b)(3) requires carriage of "the primary video, accompanying audio, and line 21 closed caption transmission" of must carry signals, and the Commission correctly acknowledges that this provision relates to analog technology. *Second Report and Order* ¶ 34.
  - The Commission must determine how the choices Congress made in defining the content subject to must carry apply to DTV signals.
    - At the time the Cable Act was adopted, there were no secondary video services that could be transmitted on an analog TV channel.
    - The services that were permitted in 1992 but not subject to must carry were subscription services for which special receivers were required, such as teletext or audio on subcarriers.
    - Cable was required to carry all of the content of an analog TV signal that could be received over the air on an ordinary receiver. Applying the same principle to DTV signals, MVPDs should be required to carry all non-subscription materials. Subscription services – which are ancillary and supplementary – are not entitled to carriage, as Congress noted in 1996. The remaining streams in a DTV signal are entitled to carriage. Any other result would leave cable subscribers receiving less of a local broadcast signal than over-the-air viewers – a result inconsistent with Congress' goals in adopting must carry.
- **Multicast Carriage Would Advance The Interests Supporting Must Carry**
  - The Supreme Court in *Turner II* concluded that must carry would advance the government's interest in "preserving the benefits of free, over-the-air local broadcast television for viewers," and "promote the widespread dissemination of information from a multiplicity of sources." 520 U.S. at 189.

- The Commission has also recognized that advancing the transition to digital television is an important governmental interest, a conclusion upheld by the D.C. Circuit in *Consumer Electronics Association v. FCC*, 347 F.3d 291 (D.C. Cir. 2004).

- Multicast carriage would advance the government's interest in a strong, local over-the-air broadcast system.

  - Justice Breyer explained that the goal of must carry was to provide viewers with "an expanded range of choice," and "provide over-the-air viewers who *lack* cable with a rich mix of over-the-air programming." *Turner Broadcasting System, Inc. v. FCC*, 520 U.S. 180. 226 (1997)(Breyer, J., concurring).

    - The government's interest is not, therefore, limited to preserving existing broadcast service, but instead to increasing the service available to over-the-air viewers and cable subscribers.

- Cable carriage of broadcasters' full digital signals is supported by the governmental interest in preserving and strengthening a diverse broadcasting system.

  - Congress found that must carry is "necessary to serve the goals contained in Section 307(b) of the Communications Act of 1934 of providing a fair, efficient, and equitable distribution of broadcast services." Cable Act of 1992 § 2(a)(9); *see* H. REP. NO. 628, 102d Cong., 2d Sess. 64 (1992).

  - The Supreme Court agreed that Congress could act to ensure a wide diversity of broadcast services. *Turner II*, 520 U.S. at 192-94.

  - Congress in 1996 adopted Section 336(a) to provide that digital television broadcasters would have the right to provide new and innovative services on DTV channels in addition to existing television services. *See* 47 C.F.R. § 73.624(b-c)(authorizing DTV services in addition to a single free video service).

  - If cable is allowed to strip free services from local digital television signals, cable would then be in the same position of second-guessing Congress' and the Commission's judgments about the need for local broadcast services that Congress enacted must carry to prevent.

- There is ample evidence of the benefits that the public will receive from broadcast multicast programming.

  - The Supreme Court readily accepted Congress' conclusion that, without carriage, local broadcast signals would weaken or fail. Cable does not

argue, and could not, that multicast programming can be sustained without access to MVPD subscribers.

- Chairman Martin, in his separate statement on the *Second Report and Order*, concluded that the record is "replete with examples of the free programming services broadcasters want to provide and expand." 20 FCC Rcd. at 4550. The evidence of the benefits to the public from broadcast multicast services continues to grow.

- Two new broadcast networks – CW and My Network TV – have affiliated in many medium and smaller markets with digital television stations and will be broadcast as multicast signals. *See* Greppi, *Affiliation Pacts Nail Down Top 50 Markets for The CW*, Television Week, May 18, 2006; Romano, *Down in the Valley*, Broadcasting & Cable, May 15, 2006; Bird, *Ch. 12 Signal to Carry CW Network*, Cincinnati Post, Apr. 22, 2006; Romano, *Stations Build Virtual Duopolies*, Broadcasting & Cable, Mar. 27, 2006. Carriage on cable of these multicast channels will expand the range of choices and programming from the local broadcasting system.

  - Conversely, if they are denied carriage, these new networks will either fail altogether or be less successful, weakening the entire over-the-air broadcasting system.

- Local stations are providing innovative services over multicast channels. For example, WDBJ-TV, Roanoke, Virginia, has begun the Seven Too multicast channel, which offers local news at times other than on the station's analog signal, additional programming not otherwise available in the market, and will provide CW network programming. On an additional multicast signal, WDBJ-TV provides real time weather radar to viewers.

- KNVA-TV, Austin, Texas, will use multicasting to provide programming from *both* CW and My Network TV. *Austin American-Statesman*, June 3, 2006.

- ION Media Networks, formerly Paxson Communications, will begin offering I-Health, a digital multicast network devoted to consumer healthcare and healthy living, on ION stations this year, and will make it available to other digital stations in 2007. ION Media Networks to Launch New Digital Health Network, Press Release (May 31, 2006). Having more information about healthcare available to the public will serve the public interest.

- ION, NBC and Telemundo previously announced a new bilingual digital channel devoted to children's programming intended to promote literacy. The network's programming will be supported by Scholastic Media, the world's largest publisher of children's books, Classic Media/Big Idea, a

leading producer of children's programming, and Corus Entertainment. While some of the new network's programming will be distributed on NBC, ION and Telemundo's analog networks, the full content will only be available on a digital multicast channel. ION Media Networks, Scholastic, NBC Universal, Corus Entertainment, and Classic Media/Big Idea Unite to Launch Groundbreaking Multi-platform Network for Children, Press Release (May 9, 2006).

- The record contains other evidence of new services that will be dependent on MVPD carriage of multicast programming. These include a free network with instructional programming for children proposed by DIC Entertainment, programming dealing with minority health issues to be provided by the National Medical Association, ABC's use of multicast signals to provide the innovative news service – *ABC News Now*, and local minority-oriented programming proposed by the Black Education Network. *See* NAB/MSTV Petition for Reconsideration, CS Docket No. 98-120 (April 21, 2005) at 18-20; Petition for Reconsideration of the ABC Television Affiliates Assn., *et al.*, CS Docket No. 98-120 (April 21, 2005) at 9-11. Moreover, nearly 80% of broadcasters responding to a survey about their multicast plans stated that they would be unlikely to offer multicast services if those services were not carried by their local cable operators. *See* NAB, July 2005 Survey of Television Stations' Multicasting Plans.

- The record before the Commission shows many other ways in which multicasting will strengthen over-the-air broadcast service:

  - The economic position of medium and small market TV broadcasters is declining, and the costs of the DTV transition for them are proportionately higher than for larger stations. *See* NAB, *The Declining Financial Position of Television Stations in Medium and Small Markets*, App. C to Comments of NAB, MB Docket No. 02-277 (Jan. 2, 2003); Report and Order and Notice of Proposed Rulemaking, *2002 Biennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules*, 18 FCC rc 13620 ¶ 201 (2003), *aff'd in part and remanded in part sub nom. Prometheus Radio Project v. FCC*, 373. F.3d 372 (3d Cir. 2004).

  - The ability to share the costs of programming, facilities and personnel over several program streams and obtain increased advertising revenues from multiple programs will add to the health of the over-the-air broadcasting system.

- The record shows that multicast must carry will strengthen localism:

- Congress found that a key benefit of must carry would be ensuring "the local origination of programming." Cable Act of 1992 § 2(a)(10).

- A survey of television stations' multicasting plans reported that 85% of stations currently multicasting or with plans to multicast expected some or all of their multicast programming to be locally produced or locally focused, such as local news, weather and sports. *See* NAB, July 2005 Survey of Television Stations' Multicasting Plans. For example, the New York Times Broadcasting Group wants to use multicast capability to offer news programming focused on particular communities in its markets. NBC Affiliates Special Factual Submission, CS Docket No. 98-120 (filed Jan. 8, 2004) at 9-10.

- Multicasting also will permit stations to tailor emergency programming, such as weather alerts, to the specific needs of different communities in television markets. For example, during a tornado, one multicast channel can be used to provide warnings to residents ahead of the tornado, and another to provide disaster relief information to areas where the tornado has passed. But, without carriage of these channels – which may be added to broadcast programming as need arises – most viewers could not see them. Local stations multicasting NBC Weather Plus provided vital information on a market-by-market basis before, during and after Hurricane Katrina.

o Multicasting will strengthen diversity

- Cable systems currently have a "stranglehold" over new program channels. *See* The America Channel, LLC's Petition to Deny, MB Docket No. 05-192 (filed July 21, 2005), at 28-36. By providing an opportunity for programmers to reach the public on over-the-air channels, multicast must carry will weaken this "stranglehold" and strengthen competition in the programming markets.

- The Commission, in the cross-media ownership rules currently in effect, counts cable systems as one voice, recognizing that, no matter how many channels of cable service are provided, they are all controlled by a single cable operator. *See* 47 C.F.R. § 73.3555(a)(c)(3)(iv)(2002). The only information on a cable system that is not under the control of the cable operator is that on local broadcast signals or on PEG channels.

- Multicast must carry will further Congress' goal of "promoting the widespread distribution of information from a multiplicity of sources." Despite cable's argument that signals under broadcaster control would not add to source diversity, the fact that new channels would not be controlled by the sole cable operator will increase the diversity of programming

available to both cable subscribers and over-the-air viewers.

- Multicast must carry will strengthen competition

  - By ensuring access of broadcast signals to MVPD subscribers, a multicast must carry rule will deter anticompetitive conduct by cable operators, as Congress intended in adopting must carry in 1992.

  - Ensuring carriage of one digital stream, but not all, would allow cable systems to exercise similar "gatekeeper" authority as they had before must carry rules were adopted which Congress found harmed the public interest. Cable Act of 1992 § 2(a)(15).

  - Further, by adding to the mix of programming options available free and over-the-air, multicast must carry will add increased competition for MVPDs since viewers will be able to obtain greater program choices without subscribing to MVPD services.

- Multicast must carry will advance the government's interest in the digital transition

  - The federal government has a substantial interest in the successful completion of the digital transition.

  - While Congress set a "hard date" for the end of analog broadcasting, it made clear the government's interest in ensuring the continued universal access to local broadcast programming by mandating consumer awareness programs and by establishing a program to subsidize converters for analog televisions.

    - The funding available for the converter program will not be sufficient to provide a converter for all of the millions of analog televisions that are not connected to MVPD service.

    - To the extent that television households purchase digital receivers, the burden on the government of providing converters will be reduced.

  - The widespread availability of new and innovative services on local broadcast digital channels will incent viewers to purchase digital receivers, reducing the number of households requiring converters. Since multicast programming, even on cable, may be accessible only to homes with digital receivers, increasing the number of digital receivers in cable homes will also reduce the need for long-term downconversion capability that cable systems will have to provide.

July 2005 Survey of Television Stations' Multicasting Plans

NAB Research and Planning

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Methodology Notes

- A survey was conducted in July 2005 of all U.S. full-power commercial television stations on their plans for DTV multicast services.
- Responses were received from 450 stations of the 1,151 eligible stations contacted, representing a response rate of 39.1%

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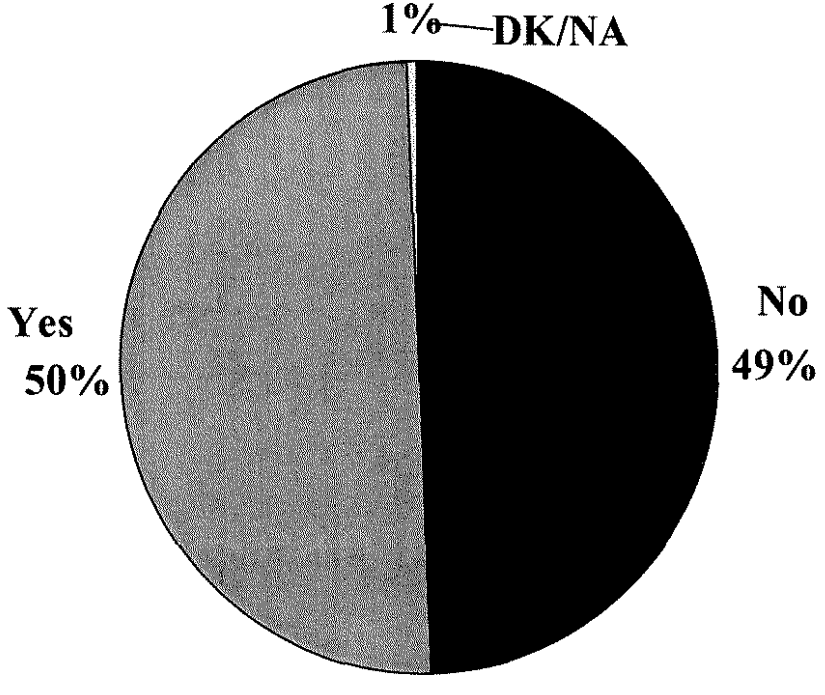
Multicasting Survey Results

Is your station currently multicasting? (N = 421)



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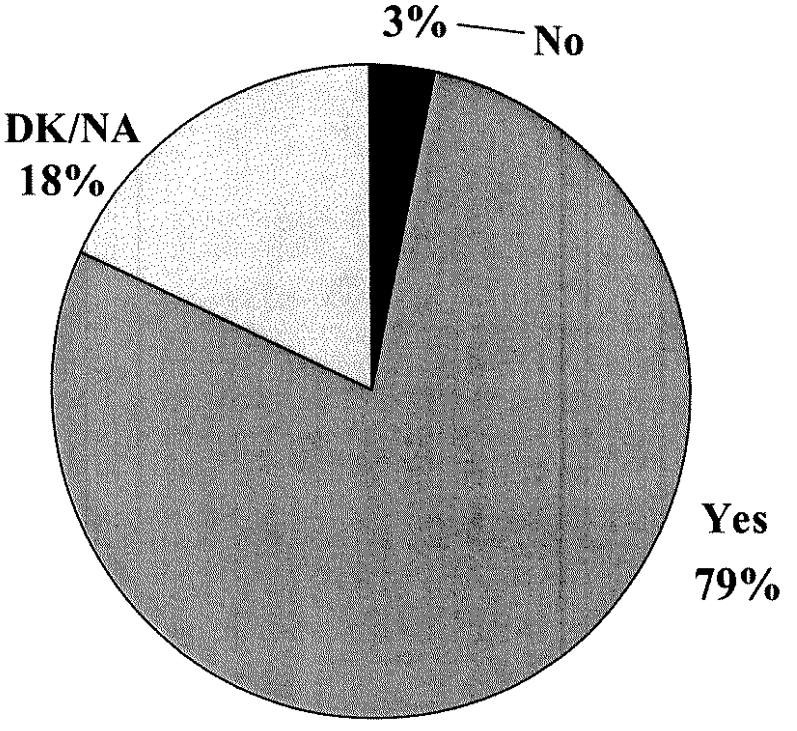
Multicasting Survey Results

If your station is not currently multicasting, are you considering multicasting at some point in the future? (N = 208)



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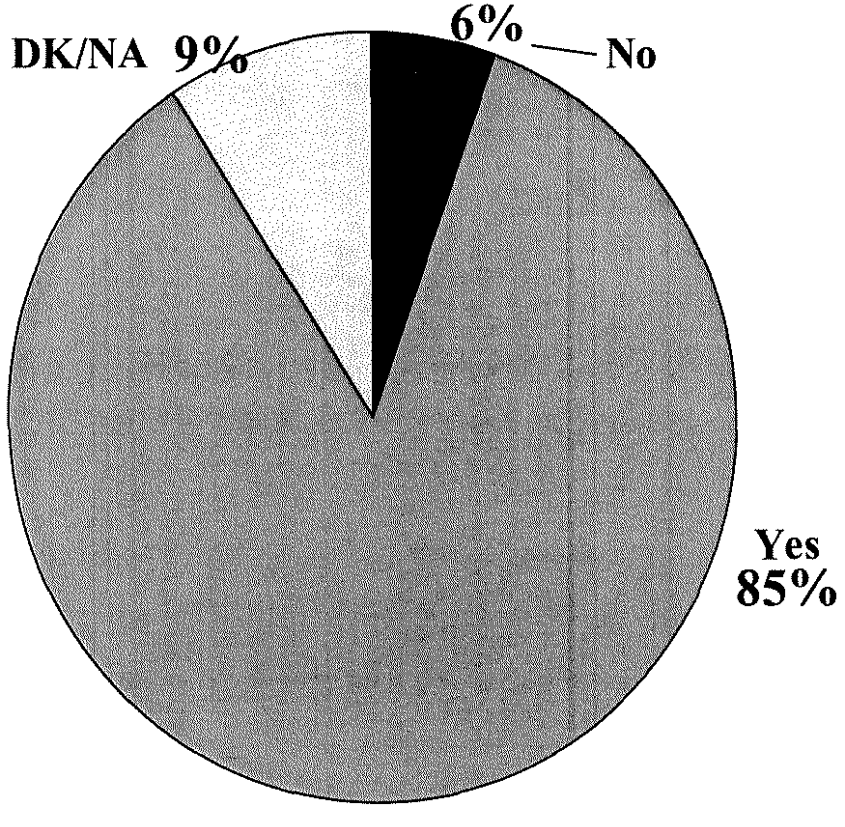
Multicasting Survey Results

If you currently multicast or plan to multicast:
Do you expect some or all of your future multicast programming to be locally produced or locally focused? (N = 371)



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Multicasting Survey Results

Examples of the types of locally produced/locally focused programming respondents reported they are considering:

- Local News/Weather/Sports (nearly 90% of respondents cited this)
- Church Services/Religious programming
- Public Affairs and Community Affairs programming
- Coverage of Community Events, and Political Events and Meetings
- High School and College programming (sports and non-sports)
- Foreign Language programming
- Educational/Children's programming
- Cultural Events and Local Arts and Entertainment programming

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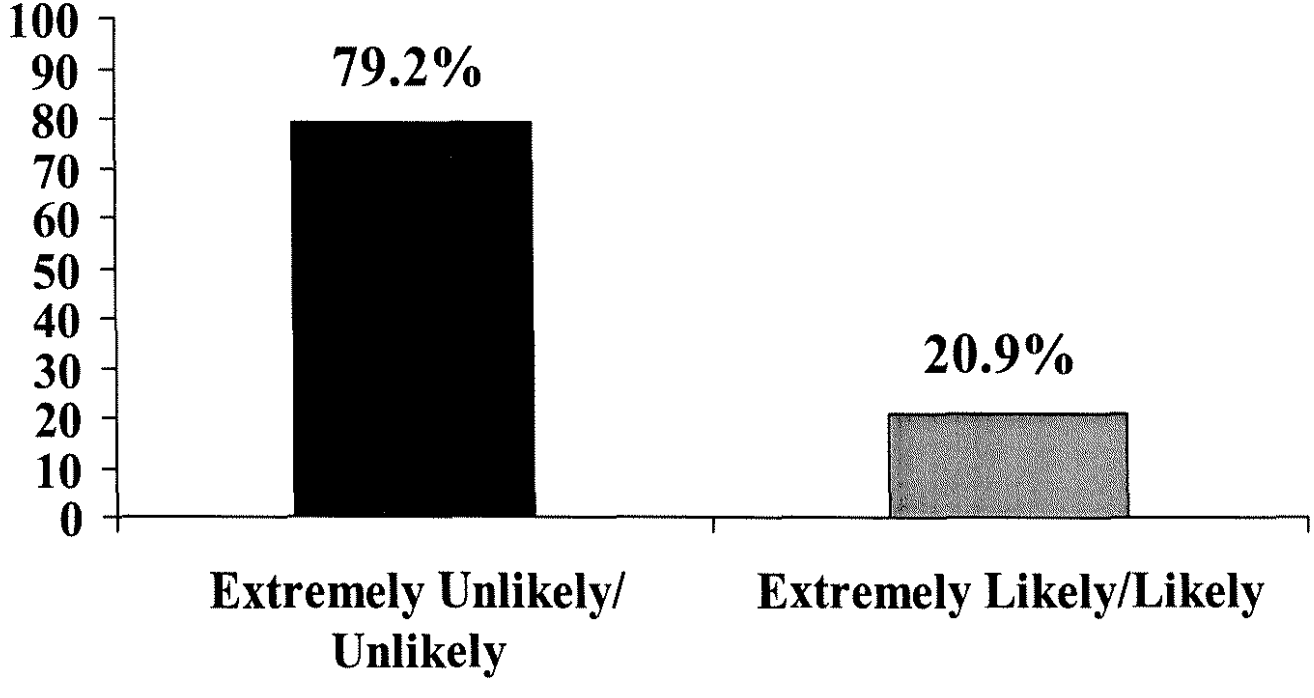
Multicasting Survey Results

If you currently multicast or plan to multicast:
If your multicast services were not to be carried by the major cable systems in your market, how likely is it that you will provide these types of services in the future? (N = 359)



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Selected Comments of Television Broadcasters
Multicast Plans and Cable Carriage

Source: Verbatim Responses to Open-Ended Question Soliciting Additional Comments on Multicasting, NAB Survey of Stations, July 2005

- All of this type of lower rated but important to the local community programming could not exist without full distribution to all local viewers.

- Because of the investment that we have to make to produce viewer-worthy programming, we need the cable carriage in order to reach as many viewers as possible. Advertisers are not willing to support us if we do not have a sufficient level of viewing to make the investment worth it for them. Without a reasonable return on investment, we cannot make these programming choices available to local audiences.

- Currently there is NO 24/7 news/weather service available in the community. On cable and DBS CNN, Fox News, etc. provide ONLY national news. The Weather channel provides an automated weather summary 'on the 8's', but no local involvement. We have two full-time meteorologists on the staff who would be available for recording or live weather inserts, plus we do have capability to run crawls and radar of current conditions. The dominant local cable MSO requests 'veto rights' over anything that we would carry on a digital multichannel that 'they consider' to be competitive, such as news, weather, sports, local auction channels, etc. They consider the spectrum as theirs and only feel obligated to carry the PRIMARY digital channel.

- In order to program the digital channels it requires an audience. When you only reach 15 percent of the market that is not sufficient of an audience to program the digital channels.

- [We are] the only full power affiliate in [the area]. We provide news, weather and breaking news information to our community. Issues like extreme weather conditions leading to flash floods, lightning and ultimately wild fire are critical to our community. We intend to add services to our digital channel which will address the need for additional local news and multi language news to better server our community. Without Cable Carriage of all of these services, we will not be able to reach the 60% of our viewers who use cable. We do not charge the cable company for our services and feel the additional offerings would be of great benefit to our community.

- My primary MSO has emphasized that they have no intention of providing 'full-stream' carriage which I feel has hampered our ability to successfully get the necessary funding to complete the DTV Transition. My opinion is that they are acting like an 800 Pound Gorilla along with most other MSO's. This action along with other actions that they have taken have made my station's future questionable!

- None of these services are provided. Several would address critical issues in our community but it would be hard to justify the additional expense without guaranteed cable carriage. Viewers already are quite confused about the differences between digital TV, digital cable, regular cable, analog TV and the channel designations are extraordinarily confusing. The more viewers have to switch between cable and off-air reception, the less likely they are to watch. It's ironic that cable doesn't want to carry unique, locally produced programming but has no problem carrying dozens of cable networks with no identifiable viewing.

- Our market is more than 85% cable. All local stations are UHF, and with the exception of the ABC and NBC affiliates, all other local affiliates are LPTV's. Without cable carriage, it would be impossible for any significant number of people to view multicast programming.

- [Our] market is situated between [four other cities in two states]. As a rural area, we serve many small communities that revolve around their local schools. We approached [the cable operator] about carrying a proposed Local High School Sports Channel with no success. The [MSO] executives who make programming decisions are located outside our market (two hours away) and are not in tune with the needs of the communities they serve. With little cable competition, [the MSO] is the gatekeeper and we, as an independent broadcaster, have little clout. Multicast must carry is vital for us to better serve our communities.

Selected Examples of Planned Local Multicast Programming

Source: Verbatim Responses to Open-Ended Question on Multicast Plans, NAB Survey of Stations, July 2005

- 24-hour News, 24-hour weather, local sporting events/ coverage, Hispanic produced shows, Cooking and Home Remodeling Shows
- 24-hr weather channel; hyper-local news for individual counties; 10:00pm market-wide newscast; adult literacy programs; news talk programs on community issues
- All of the channels under consideration will have a local focus. For instance, if we produce a news, weather, or sports channel, it will cover local issues, events, teams, etc. If we produced military channel, it would focus on local military installations, the people who work there and the issues in which they are interested.
- Beach news entertainment guides, restaurant guides etc.
- Breaking news; civil defense warnings; political debates; extended coverage of local and state government meetings, hearings, etc; arts and entertainment; childrens programming; educational programming, local and regional sports
- Channel provided to local high school, religious channel for local area religious group, full program channel for local originator
- Community affairs program, local religion, locally produced programs
- Community interests and projects: Forums,News,Weather,Sports
- Continuous weather reports for local area. Zoned newscasts.
- Currently do local sport shows, weather program, parade, City Council meetings, Economic Development Programs, Continuous Storm Coverage
- Educational programming, specifically produced for distance learning High School related programming, particularly high school sports of local schools Children's programming with a very local focus on literacy
- Extended local breaking news and weather coverage, community forums, talk programs, political debates, expanded coverage of local issues
- High school football shows; sports re-cap; Spanish novellas/entertainment; religious telecasts
- High School sports, university related specials, news specials, weather specials
- Hyper local 24/7 news and weather
- Local/Regional News, Weather Sports, Programs produced by numerous local producers of various backgrounds and languages, particularly Spanish language, Vietnamese and Chinese
- Local all weather channel (we are currently doing this) Local broadcasts of sporting events, town hall meetings, important local governmental meetings
- Local Arts & Entertaiment programming (live concerts, events, etc.) High School sports (Football, Baseball, Soccer, etc)
- Local news and weather, emergency information, hispanic local news and weather. Local religious programs
- Local news, local calender of events, local Government coverage, local music events.
- local news, weather, sports - spanish language - local educational for adults & children
- Local press conferences, community town hall meetings, political roundtables & debates, sports (HS)
- Local programming will include ministry related topics and guests in interview format; cooking and health programs with doctors promoting life style modifications; children's Bible based instruction; Latino Christian oriented programming.

- Local weather channel (alpha version on air now); local newscasts, public affairs programming, and viewer created programming.
- Local weather channel, including live continuous coverage during severe weather. Local info and entertainment aimed at the minority community (including spanish language). Lifestyle content including local restaurant/food programs, local housing and decorating focus.
- Minor League baseball games, breaking news, press conferences, school initiatives, public affairs, documentaries.
- News programs, weather/radar streaming, public affairs programs, including talk, information programming covering local issues, politics, government, business, community-based parades, special event programming such as the [local] Marathon, comunity-based ethnic parades, programs profiling community leaders, information programs centering on ehtnic communities, Black History Month programs, Hispanic Heritage Month programs, Asian Pacific Hertiage Month programs etc.
- We are looking at some opportunities to provide local programming to smaller groups of our community. They may include geographic concentration or perhaps special spanish language local programming.
- Weather information will mostly be local with an emphasis on severe weather. Traffic information is all local. Breaking local news. News content that go deeper than what is available in our newscasts such as longer interviews.

Cable Advertising Revenue

Cable Advertising Revenue: 1985-2006

Year	Cable Network Revenue	Local/Spot Revenue	Regional Sports Revenue	Total Adverti Revenu
2006	$18,098	$5,204	$686	$24,611
2005	$15,558	$4,647	$630	$21,301
2004	$13,755	$4,149	$578	$18,816
2003	$12,343	$3,698	$510	$16,805
2002	$10,836	$3,426	$490	$14,896
2001	$10,418	$3,256	$442	$14,203
2000	$10,575	$3,240	$425	$14,294
1999	$8,876	$2,667	$364	$11,920
1998	$7,187	$2,233	$310	$9,730
1997	$5,901	$1,925	$261	$8,087
1996	$4,911	$1,662	$225	$6,799
1995	$3,999	$1,433	$201	$5,628
1994	$3,286	$1,204	$169	$4,659
1993	$2,830	$978	$164	$3,971
1992	$2,423	$818	$140	$3,381
1991	$2,098	$710	$118	$2,926
1990	$1,819	$634	$103	$2,556

1989	$1,396	$496	$74	$1,966
1988	$1,135	$374	$52	$1,561
1987	$891	$268	$33	$1,192
1986	$748	$195	$22	$965
1985	$634	$167	$14	$815

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