

UNITED STATES GOVERNMENT

memorandum

DATE: September 10, 2007
TO: William Caton
FROM: Jeremy M. Kissel
SUBJECT: Documents for Inclusion in Docket CS 98-120



Attached are documents that need to be included in Docket CS 98-120. Please let me know if you have any questions, or if you need any additional information. Thank you!

Jeremy

A handwritten signature consisting of several overlapping loops, appearing to be the name 'Jeremy'.



FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

September 6, 2007

The Honorable Deborah Taylor Tate
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

Dear Commissioner Tate:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

No. of Copies rec'd 0
List A B C D E

www.tec.com
601.354.9070 T
601.355.1964 F
P.O. Box 22923
Jackson, MS 39225
236 E. Capitol Street
Jackson, MS 39201

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

On behalf of TEC and Peoples CATV, Inc., I thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Garner", with a long horizontal flourish extending to the right.

James W. Garner
Vice President of Operations

JWG/vg



POST OFFICE BOX 22923 • JACKSON MISSISSIPPI 39226

September 6, 2007

The Honorable Deborah Taylor Tate
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

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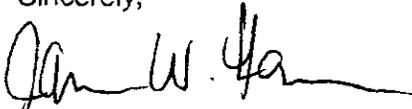
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Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

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Sincerely,

A handwritten signature in black ink, appearing to read "James W. Garner". The signature is fluid and cursive, with a long horizontal stroke at the end.

James W. Garner
Vice President of Operations

JWG/vg

From: Lange, Linda J [mailto:llange@hearst.com]
Sent: Wednesday, September 05, 2007 8:48 AM
To: Kevin Martin
Subject: CableTV Viewability Proposal (From David Barrett)

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

Dear Chairman Martin:

On behalf of Hearst-Argyle Television, Inc. and our 29 owned and managed television stations, I would like to register our support for the **CableTV Viewability Proposal** which I understand will be considered at a September 11, 2007 meeting.

We view this proposal as the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition occurs.

It is our hope and expectation that our TV signals will be protected from material degradation, and that our viewers/consumers will be able to enjoy the full benefits of High Definition Television.

We ask that you vote in support of the **CableTV Viewability Proposal**.

Thank you.

David J. Barrett
President & CEO
Hearst-Argyle Television, Inc.
300 West 57th Street, 39th Floor
New York, NY 10019
212-887-6811

=====
This e-mail message is intended for the personal use of the recipient(s) named above. If you are not an intended recipient, you may not review, copy or distribute this message.

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=====

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

From: Kelly Otto [mailto:kotto@exchange.ncn.net]
Sent: Friday, September 07, 2007 4:47 PM
To: Deborah Tate
Subject: Triple Carriage Requirement Northwest Communications Inc 844 Wood Street
Havelock, IA 50546

**Triple Carriage Requirement Northwest Communications Inc 844 Wood
Street Havelock, IA 50546**

To: FCC Commissioner

On September 11th your vote against the Triple Carriage requirement or, at a minimum, addition of a small company waiver is requested. As the Chief Executive Officer of an independent cable television company I would strongly urge you to vote against this or to offer an exemption for small companies.

Our minimum request:

Because of the financial hardship the proposed order would impose on small video providers an exemption from the FCC triple carriage rules should apply to all small CATV and IPTV systems with:

- (1) 10,000 subscribers or less, or**
- (2) that operate at or below 550 MHz capacity, and**
- (3) CATV and IPTV providers with more than 10,000 subscribers or providers that operate at greater than 550 MHz have more flexibility and dollars to apply for a financial hardship waiver from the FCC's triple carriage rules.**

If passed without a waiver all small cable systems would be required to have the additional cost of the equipment or a major upgrade of their system to carry broadcasters signal in high definition, standard definition and analog. These requirements are very costly for small companies. We serve 5 communities with a total of approximately 700 customers.

We have been forced throughout the past year to increase our rates significantly due to broadcast retransmission agreements and this would cause yet an additional hardship and increase cost to our customers. As of today we carry cable television because our customers are not able to reach most broadcast signals from antennas; however, it does not profit. If we are forced to supply the triple carriage cable television will become even more of a burden and many companies will be forced to discontinue serves as we do not have enough customers to support the increasing costs.

I again urge you to vote against the upcoming Triple Carriage or at a minimum addition of a small company waiver as it would cause significant hardships not only on our company but potential loss of service to our customers.

If you have any questions please feel free to call me at 712-776-2222 or via cell phone 712-358-0019. Email miller@ncn.net.

**Donald Miller
Chief Executive Officer
844 Wood Street
Havelock, IA 50546
712-776-2222
Cell: 712-358-0019
Email: miller@ncn.net**

From: Haeefe TV Inc. [mailto:htv@htva.net]

Sent: Friday, September 07, 2007 2:12 PM

To: Kevin Martin; Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell

Subject: FCC Triple Carriage Proposal

FCC Triple Carriage Proposal: We operate five small cable television systems and this proposal wants to require us to transmitt all analog and digital stations simutaneously. We provide stations from 3 markets and this is simply too many stations for us to carry. We don't have the channel capacity or technical ability to change the capacity to comply with the proposed rule. Lee Haeefe, President

Thanks,

Denise Laue, Vice President

Haeefe TV Inc.

607-589-6235

607-589-7211 Fax

htv@htva.net

www.htva.net

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.485 / Virus Database: 269.13.8/993 - Release Date: 9/6/2007 3:18 PM

From: Charles Collins [mailto:ccollins@wltz.com]
Sent: Friday, September 07, 2007 1:49 PM
To: Kevin Martin; Michael Copps; 'Jonathan.'; Deborah Tate; Robert McDowell;
mmacbride@nab.org; cwilkins@nab.org
Cc: eileen@shbtv.com; Drew Rhodes
Subject:

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SEP 10 2007
Federal Communications Commission
Office of the Secretary

Honorable Chairman Martin & Commissioners,

Things are beginning to move very quickly in the digital transition and February 17, 2009 will be here before we know it. Many local television stations, including NBC Columbus, are launching educational efforts aimed at viewers and forming partnerships with digital television dealers in an effort to make this an exciting transition for our industry.

I am asking for your support of the Cable TV Viewability Proposal. There must be a way to guarantee that analog cable subscribers will not be disenfranchised after February 17, 2009. There is a great deal of educating to be done in a very short period of time, certainly representing a daunting task for us all. Television signals must be protected from material degradation so that all consumers can gain the full benefits of HDTV.

It is imperative that in the Columbus, GA DMA market 128, with a cable penetration of over 74%, cable operators implement one of the two options offered in the proposal for our must-carry signal. It is critical to the American consumer, our viewers, that this Cable TV Viewability Proposal be adopted by the Commission. Thank you,

Charles Collins
Operations Mgr/ Program Dir
WLTZ-TV NBC38
Ph: 706-561-3838
Fax: 706-561-3880
ccollins@wltz.com

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Checked by AVG Free Edition.
Version: 7.5.485 / Virus Database: 269.13.8/993 - Release Date: 9/6/2007 3:18 PM

From: Joan Long [mailto:joan@galaxycable.com]
Sent: Friday, September 07, 2007 12:32 PM
To: Deborah Tate
Subject: The FCC's Proposed Triple Carriage Must-Carry Order

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

September 7, 2007

Re: Proposed Triple Carriage Must-Carry Order

Dear Commissioner Tate:

Our company, Galaxy Cable Inc., is a small cable television operator offering services to rural mid-America. We have a long history of providing high-quality, innovative video service to our communities. We have made significant investments in our facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, we are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, we must offer consumers a robust service.

However, we, as a small operator and a member of the American Cable Association, are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators like us to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators, including our company, simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for us to upgrade our facilities to all-digital and provide set-top boxes to all of our subscribers.

In some cases, the triple-carriage requirement will force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, some operators, including our company, could be compelled to shut down some of our systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order **must be rejected** in order to not harm rural consumers and the companies that serve them. We, along with our subscribers, are hopeful that you and the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

C. Shay Borders
Director of Operations
Galaxy Cable Inc.
sborders@galaxycable.com

From: Mac Douglas [mailto:mdouglas@kwes.com]
Sent: Friday, September 07, 2007 12:19 PM
To: Kevin Martin
Cc: Michael Capps; Jonathan Adelstein; Deborah Tate; Robert McDowell
Subject: Cable TV Viewability Proposal

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

Honorable Chairman Martin & Commissioners,

The transition to digital is moving rapidly and February 17, 2009 will be here before we know it. Many local television stations, including KWES-TV in the Odessa-Midland, Texas market, are launching educational efforts aimed at viewers and forming partnerships with digital television dealers in an effort to make this an exciting transition for our industry.

There is a great deal of educating to be done in a very short period of time, certainly representing a daunting task for us all. But it is unrealistic to think that all consumers in America will be prepared for the transition by February 17, 2009. Therefore, there must be a way to guarantee that analog cable subscribers will not be disenfranchised after the transition date. At the same time, television signals must be protected from material degradation so that all consumers can gain the full benefits of HDTV. I am asking for your support of the Cable TV Viewability Proposal so all American television consumers will be protected.

It is imperative that in the Odessa-Midland, Texas market, DMA 159, with a cable penetration of over 71% that cable operators implement one of the two options offered in the proposal for our must-carry signal. It is critical to the American consumer, our viewers, that this Cable TV Viewability Proposal be adopted by the Commission.

Thank you for your consideration.

Sincerely,

Mac Douglas
Vice President & General Manager
KWES-TV/KTLE-LP/KTXC-FM/LATV

From: Keith True [mailto:ktrue@fox24.com]
Sent: Friday, September 07, 2007 11:55 AM
To: Kevin Martin
Cc: tvacquisitions@aol.com; mmacbride@nab.org; cwilkins@nab.org; Robert McDowell; Deborah Tate; Jonathan Adelstein; Michael Copps
Subject: CableTV Viewability

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SEP 10 2007

Honorable Chairman Martin and Commissioners

As we quickly approach the digital transition date of February 17, 2009, WGXA FOX 24 will continue its efforts to inform and educate the viewers of Macon, Ga. of the changes coming to our industry.

Federal Communications Commission
Office of the Secretary

I am asking you for your support of one of the two options being offered in the Cable TV Viewability Proposal. It is critical that analog cable subscribers not be disenfranchised and television signals be protected from material degradation.

Currently in Macon, Ga cable penetration is 64% in the metro and 56% in the DMA. These consumers have the right to be protected and receive the full benefits of HDTV.

Thank you,
Keith True
Vice President/General Manager
WGXA FOX 24
Macon, Georgia
478-745-2424

From: Steve Friedman [mailto:stevef@wavebroadband.com]
Sent: Friday, September 07, 2007 10:04 AM
To: Deborah Tate
Subject: Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

September 7, 2007

The Honorable Deborah Taylor Tate
Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

Dear Commissioner Tate:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and eliminating access to any broadband service for some consumers.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Steve C. Friedman
Wave Broadband
401 Kirkland ParkPlace
Suite 500
Kirkland, WA 98033
(425)896-1882
sfriedman@wavebroadband.com

From: denniswallace@gotricounty.com [mailto:denniswallace@gotricounty.com]
Sent: Friday, September 07, 2007 8:59 AM
To: Deborah Tate
Subject: Triple DTV Carriage

September 7, 2007

To the Members of the United States Senate
To the Members of the United States House of Representatives

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

Dear Senators and Representatives:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

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Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of

the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Dennis M. Wallace, Jr.
CEO
TriCounty Telecom

FILED/ACCEPTED

From: Randy Wright [mailto:randyw@KMIZ.com]

Sent: Thursday, September 06, 2007 9:55 PM

To: Kevin Martin; Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell

Cc: Dave Joseph; Randy Wright; cwilkins@nab.org

Subject: Re: Cable Television Viewability Proposal

SEP 10 2007

Federal Communications Commission
Office of the Secretary

Honorable Chairman Martin & Commissioners,

The digital transition for free over the air television is set for February 17, 2009 and that important and historic date will be here quickly. Many local television stations, including ABC17, Fox38 and KZOU, serving the Columbia-Jefferson City, Missouri market, are planning educational efforts aimed at viewers and forming partnerships with digital television dealers in an effort to make this an exciting and smooth transition for our industry.

But today, I am writing to ask for your support of the Cable TV Viewability Proposal, an important component of that transition. There must be a way to guarantee that analog cable subscribers will not be disenfranchised and cut off from free over the air television after February 17, 2009 and adoption of this proposal will ensure service is maintained through the transition date. A tremendous task lies ahead of us to educate Americans regarding this pivotal time in the history of our nation and all Americans must know that their television signals are going to be protected from material degradation so that all consumers can gain the full benefits of HDTV.

It is critical to the American consumer, our viewers, that as we move toward the digital transition date in 2009 that this Cable TV Viewability Proposal be adopted by the Commission. Adoption of the proposal will assist greatly in making the transition to digital a smooth and orderly one. Thank you.

Best regards,

Randy Wright
General Manager
ABC17/Fox38/MyZou32/ABC17 Stormtrack 24/7
501 Business Loop 70 East
Columbia, Missouri USA
65201
573-449-0917
573-875-7078 (Fax)
573-228-1701 (Cell)
randyw@kmiz.com
www.kmiz.com

"ABC17's Good Morning Missouri, Columbia's #1 Morning Newscast"

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

From: Frank Bulk [<mailto:fbulk@mypremieronline.com>]

Sent: Thursday, September 06, 2007 7:11 PM

To: Jonathan Adelstein; Michael Copps; Kevin Martin; Robert McDowell; Deborah Tate

Subject: Re: Triple Carriage Issue

Commissioners:

It has come to my attention that the FCC may have plans to vote on what is called the "Triple Carriage" issue. While it is normally in every cable provider's best interest to retransmit local broadcasting stations, it would place an undue burden to require every MVPD to carry more than what they are currently providing.

Requiring carriage would cause undue burden on those systems that have not built out a digital and HD system, and for those that do, use up valuable spectrum.

Rather than put the onus on MVPDs to carry all stations, I would encourage the FCC to maintain carriage to one channel. Then make it optional for operators to carry the other stations, as their customers demand, not any different than any other channel in the market.

I would encourage the FCC to let market forces dictate whether an operator carries more channels than they currently are required to, rather than regulatory or governmental requirements.

If you should require triple carriage, I would simultaneously recommend that operators have the option of negotiating contracts with broadcasters in neighboring DMAs, so that some level of checks and balances can be in place.

Kind regards,

Frank Bulk
Sioux Center, Iowa
712-722-428



Bruce Cummings
General Manager
KULR Television
bcummings@kulr.com

kulr8.com

September 5, 2007

Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

Dear FCC Commissioners:

After reading the Cable TV Viewability Proposal, I am writing to you in support of the proposal. This is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition.

TV signals must be protected from material degradation so that consumers can reap the full benefits of HDTV.

Sincerely,

Bruce Cummings
General Manager KULR-8

bc/dlh

c: The Honorable Kevin J. Martin, Chairman (via email)
The Honorable Michael J. Copps, Commissioner (via email)
The Honorable Jonathan S. Adelstein, Commissioner (via email)
The Honorable Deborah Taylor Tate, Commissioner (via email)
The Honorable Robert M. McDowell, Commissioner (via email)
Marsha MacBride, Exec. VP, Legal & Regulatory Affairs, NAB (via email)

PHONE (406) 656-8000

2045 Overland Ave. Billings, MT 59102

FAX (406) 652-8207

COVERAGE, COMMUNITY, COMMITMENT



1011 Western Avenue, Suite 920
Seattle, WA 98104

September 6, 2007

Attn: Chairman: Kevin J Martin

As President and CEO of a broadcasting company serving local markets I'm writing to extend my support of the Cable TV Viewability Proposal. This is an extremely important issue, and we need to guarantee that the analog cable subscribers will not be disenfranchised after the DTV transition. We also must protect the TV signals from material degradation so that consumers can reap the full benefits of HDTV.

On behalf of consumers, please support the CableTV Viewability Proposal. It is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition

Pete Benedetti
President/CEO
New Northwest Broadcasters
(206) 204-0213 x201
www.nnbradio.com

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SEP 10 2007

Federal Communications Commission
Office of the Secretary

From: Jon Rand [mailto:Jon.Rand@kayutv.com]
Sent: Thursday, September 06, 2007 4:58 PM
To: Deborah Tate
Cc: Marsha MacBride
Subject: Cable TV Viewability Proposal

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

Commissioner Tate-

Not unlike the Y2K phenomenon we all anticipated as we welcomed in the new millennium, there are lots of unanswered questions facing all of us in the television industry as we march toward the analog TV shutoff date in February 2009.

Television broadcasters have spent enormous amounts of capital to prepare our stations to continue to serve the viewing public in a digital world. Every one of us-broadcasters, the Congress, the FCC, and the cable MSO'S will have short-changed those viewers if we don't take advantage of every means at our disposal to ensure a seamless transition.

I urge your support of the Cable TV Viewability Proposal as the key to seeing that analog cable subscribers are not left out in the cold in February 2009. Further, the purpose of our having undertaken the tremendous expense of providing HDTV signals is lost if those signals are not protected from material degradation.

We ask your support on these issues in the approaching September 11th FCC Open Meeting.

Respectfully,

Jon Rand
General Manager
KAYU Fox 28 TV, Spokane/Coeur d'Alene
KCYU Fox 41 TV, Yakima/Ellensburg
KFFX Fox 11 TV, Pasco/Richland/Kennewick/Pendleton
P (509) 448-2828
F (509) 448-1223

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

From: Joan Turner-Doyle [mailto:joanturner@kgwn.tv]
Sent: Thursday, September 06, 2007 4:47 PM
To: Kevin Martin
Cc: Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell; mmacbride@nab.org; cwilkins@nab.org; Eileen Clark; Louis Wall
Subject: Cable TV Viewability Proposal

Honorable Chairman Martin & Commissioners,

We are very quickly moving towards the digital transition and February 17, 2009 is right around the corner. Many local television stations including CBS NewsChannel 5 in Cheyenne, are launching educational efforts aimed at viewers and forming partnerships with local digital television dealers in an effort to make this an exciting transition for everyone.

I am asking for your support of the Cable TV Viewability Proposal. There must be a way to guarantee that analog cable subscribers will not be disenfranchised after February 17, 2009. There is a great deal of education that needs to be done in a very short period of time. Television signals must be protected from material degradation so that all consumers can gain the full benefits of HDTV.

It is imperative that in the Cheyenne, Wyoming DMA, market 196, with a cable penetration of over 67%, cable operators implement one of the two options offered in the proposal for our must carry signal.

It is critical to the American consumer, our viewers, that this Cable TV Viewability Proposal be adopted by the Commission. Thank you,

Respectfully,

Joan Turner-Doyle
V.P. & General Manager
KGWN/Cheyenne, Northern Colorado
KSTF/ Scottsbluff, Nebraska
KCHW/The Cheyenne CW
(307) 634-7755 office
(307) 635-8354 direct fax
joanturner@kgwn.tv

FILED/ACCEPTED

SEP 10 2007

Federal Communications Commission
Office of the Secretary

From: Ramos, Leopoldo [mailto:LRamos@kren.com]
Sent: Thursday, September 06, 2007 4:40 PM
To: Deborah Tate
Cc: Pappas, Peter
Subject:

Dear Commissioner Taylor Tate:

I am the General Manager of Pappas Telecasting's Station KREN/KAZR, the CW affiliate in Reno, Nevada.

I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage

rules next Tuesday, and am writing to express my strong support for the Commission's "viewability"

proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and

carrying both the digital and analog signals for these channels and (b) carrying the local must-carry

signals in digital only and providing the necessary equipment to ensure that all subscribers can view those

signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the

DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely

Leo Ramos

General Manager KREN/KAZR

Phone: 775-333-2727

Fax: 775-284-1800

Reno's CW

From: Jeffrey S Bartlett [mailto:jbartlett@hearst.com]
Sent: Thursday, September 06, 2007 4:25 PM
To: Deborah Tate
Subject: Cable TV Viewability Proposal for FCC Consideration

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September 6, 2007

The Honorable Deborah Taylor Tate
Federal Communications Commission
445 12 Street, SW
Washington, DC 20554

Dear Commissioner Tate,

I am writing to express my support for the Cable TV Viewability Proposal the FCC will consider at the September 11th meeting. This proposal will protect analog cable subscribers from loss of service after the DTV transition in 2009. It will also ensure our HDTV signals will not suffer material degradation which would in fact rob cable customers of the benefits of the transition ordered by the government and which broadcasters have spent millions to achieve. As the only network affiliate in New Hampshire and the only station in the state providing regular local newscasts, emergency news coverage and local sports programming, we feel it is important that our signal be viewable in the highest quality form available.

Best Regards,

(Embedded image moved to file: pic05945.pcx) Jeff Bartlett President and General Manager

(Embedded image moved to file: pic26806.pcx)

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