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April 6, 2009

OF COUNSEL:
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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**RE: In the Matter of Petitions for Declaratory Ruling Regarding Public,
Educational, and Governmental Programming MB Docket No. 09-13
CSR-8126, CSR-8127, CSR-8128**

Dear Madam Secretary:

When Meridian Township and other Michigan communities met with the Media Bureau in the above captioned matter on March 30, 2009, there were references made to tests Meridian Township conducted to locate their PEG channels on a television set equipped with a QAM tuner. The attached test reflects, absent a digital tuner from Comcast, the PEG channels cannot be found on a consistent base, if at all. We are forwarding for the record at the request of the Bureau staff.

Please direct all correspondence to the undersigned.

Sincerely,


Gerard Lavery Lederer

Attachment:
As stated.

622501:00146619.DOC

MEMORANDUM

TO: Deborah Guthrie, Station Manager, HOM-TV

FROM: 
Brian Dumont, Senior Production Manager, HOM-TV

DATE: 4/2/2009

RE: Digital Channel Test - Supplemental

The following information is the result of a test conducted to determine the location of PEG channels on Comcast digital cable and their availability to residents of Meridian Township. This information is supplemental to previous tests conducted in December 2007 and January, August and October 2008. The test was conducted by HOM-TV Senior Production Manager Brian Dumont using a QAM capable Sony digital television (model number KDL-40S3000).

The test was conducted on Tuesday, March 31, 2009 in the lobby of the Meridian Township Municipal Building in view of other employees and the general public.

To begin, a log of existing channels was created, specifically noting the location of major network affiliates and PEG channels. They appeared on the following analog and digital channels:

- 3 – WLAJ/ABC (Analog)
- 4 – WKAR/PBS (Analog)
- 7 – WSYM/FOX (Analog)
- 9 – WLNS/CBS (Analog)
- 10 – WILX/NBC (Analog)
- 18.3 – WLAJ/ABC (Digital)
- 18.5 – WSYM/FOX (Digital)
- 19.2 – WKAR/PBS (Digital)
- 19.3 – WLNS/CBS (Digital)
- 19.5 – Michigan State University Educational Access/WKAR Create (Digital)
- 19.6 – Michigan State University Educational Access/WKAR World (Digital)
- 20.3 – WILX/NBC (Digital)

- 20.7 – WILX/NBC Weather (Digital)
- 21 – Meridian Township Government Access (HOM-TV)
- 22 – Haslett School District Educational Access (Vision 22)
- 23 – Okemos School District Educational Access (The Okemos Channel)
- 24 – East Lansing School District Educational Access/East Lansing Government Access
- 27 – Michigan State University Educational Access/WKAR Create (Analog)
- 28 – Michigan State University Educational Access/WKAR World (Analog)
- 29 – Michigan State University Educational Access/(unknown content)
- 30 – Public Access
- 31 – Lansing Community College Educational Access

As with previous tests, it would appear analog channels are only available on whole numbers while digital channels only appear between whole numbers (numbers with a decimal point).

The next step was to program the television to search for and add any new digital signals it was receiving. The last time this was done was October 14, 2008. After the process was completed, the television display indicated 20 new digital channels were found.

All the analog signals of the network affiliates and PEG access channels remained consistent, however the location of the digital network affiliates changed, and digital signals for PEG channels were introduced where they had not been present before. They appear on the following digital channels:

- 6.1 – WLNS/CBS
- 10.1 – WILX/NBC
- 10.2 – WILX/NBC Weather
- 23.1 – WKAR/PBS
- 23.3 – State University Educational Access/WKAR Create
- 23.4 – Michigan State University Educational Access/WKAR World
- 47.1 – WSYM/FOX
- 53.1 – WLAJ/ABC
- 87.1 – Meridian Township Government Access (HOM-TV)
- 87.2 – Haslett School District Educational Access (Vision 22)
- 87.3 – Okemos School District Educational Access (The Okemos Channel)
- 87.4 – East Lansing School District Educational Access
- 87.5 – Michigan State University Educational Access/WKAR Create
- 87.6 – Michigan State University Educational Access/WKAR World
- 87.7 – Michigan State University Educational Access/(unknown content)
- 87.8 – Public Access
- 87.9 – Lansing Community College Educational Access
- 87.905 – Public Access

It should be noted that on April 1, 2009, the day after this test was completed, the newly added digital channels were revisited for the purpose of displaying test results to people who were not present on the day of testing. Surprisingly, the newly added PEG channels between 87.1 and 87.905 were no longer available. The actual channel number was there, but the television displayed the message "no signal" or "signal cannot be decoded." The other newly added channels for the network affiliates listed between 6.1 and 53.1 remained.

**Channel Location Test Results
On a QAM Tuner**

Test 1 Thur. Dec. 20, 2007

Channel 21	21 Analog
Channel 21	Not found on Digital
Channel 22	22 Analog
Channel 22	Not found on Digital
Channel 23	23 Analog
Channel 23	Not found on Digital
Channel 24	24 Analog
Channel 24	Not found on Digital
Channel 27	27 Analog
Channel 27	Not found on Digital
Channel 28	28 Analog
Channel 28	Not found on Digital
Channel 29	29 Analog
Channel 29	Not found on Digital
Channel 30	30 Analog
Channel 30	Not found on Digital
Channel 31	31 Analog
Channel 31	Not found on Digital

Test 2 Wed. Jan. 9, 2008

Channel 21	21 Analog
Channel 21	Not found on Digital
Channel 22	22 Analog
Channel 22	Not found on Digital
Channel 23	23 Analog
Channel 23	Not found on Digital
Channel 24	24 Analog
Channel 24	Not found on Digital
Channel 27	27 Analog
Channel 27	Not found on Digital
Channel 28	28 Analog
Channel 28	Not found on Digital
Channel 29	29 Analog
Channel 29	Not found on Digital
Channel 30	30 Analog
Channel 30	Not found on Digital
Channel 31	31 Analog
Channel 31	Not found on Digital

Test 3 Sun. Jan. 13, 2008

Channel 21	21 Analog
Channel 21	Digital 81.9
Channel 22	22 Analog
Channel 22	Not found on Digital
Channel 23	23 Analog
Channel 23	Not found on Digital
Channel 24	24 Analog
Channel 24	Not found on Digital
Channel 27	27 Analog
Channel 27	Not found on Digital
Channel 28	28 Analog
Channel 28	Not found on Digital
Channel 29	29 Analog
Channel 29	Not found on Digital
Channel 30	30 Analog
Channel 30	Not found on Digital
Channel 31	31 Analog
Channel 31	Not found on Digital

Test 4 Thurs. Aug. 14, 2008

Channel 21	21 Analog
Channel 21	"No signal" on Digital
Channel 22	22 Analog
Channel 22	Not found on Digital
Channel 23	23 Analog
Channel 23	Not found on Digital
Channel 24	24 Analog
Channel 24	Not found on Digital
Channel 27	27 Analog
Channel 27	Not found on Digital
Channel 28	28 Analog
Channel 28	Not found on Digital
Channel 29	29 Analog
Channel 29	Not found on Digital
Channel 30	30 Analog
Channel 30	Not found on Digital
Channel 31	31 Analog
Channel 31	Not found on Digital

Test 5 Tues. Oct. 14, 2008

Channel 21	21 Analog
Channel 21	Not found on Digital
Channel 22	22 Analog
Channel 22	Not found on Digital
Channel 23	23 Analog
Channel 23	Not found on Digital
Channel 24	24 Analog
Channel 24	Not found on Digital
Channel 27	27 Analog
Channel 27	Not found on Digital
Channel 28	28 Analog
Channel 28	Not found on Digital
Channel 29	29 Analog
Channel 29	Not found on Digital
Channel 30	30 Analog
Channel 30	Not found on Digital
Channel 31	31 Analog
Channel 31	Not found on Digital

Test 6 Tues. March 31, 2009

Channel 21	21 Analog
Channel 21	Digital Channel 87.1
Channel 22	22 Analog
Channel 22	Digital Channel 87.2
Channel 23	23 Analog
Channel 23	Digital Channel 87.3
Channel 24	24 Analog
Channel 24	Digital Channel 87.4
Channel 27	27 Analog
Channel 27	Digital Channel 87.5
Channel 28	28 Analog
Channel 28	Digital Channel 87.6
Channel 29	29 Analog
Channel 29	Digital Channel 87.7
Channel 30	30 Analog
Channel 30	Digital Channel 87.8
Channel 31	31 Analog
Channel 31	Digital Channel 87.9

Test 7 Wed. April 1, 2009

Channel 21	21 Analog
Channel 21	Not found on Digital
Channel 22	22 Analog
Channel 22	Not found on Digital
Channel 23	23 Analog
Channel 23	Not found on Digital
Channel 24	24 Analog
Channel 24	Not found on Digital
Channel 27	27 Analog
Channel 27	Not found on Digital
Channel 28	28 Analog
Channel 28	Not found on Digital
Channel 29	29 Analog
Channel 29	Not found on Digital
Channel 30	30 Analog
Channel 30	Not found on Digital
Channel 31	31 Analog
Channel 31	Not found on Digital