

Commission's Secretary,  
Office of the Secretary,  
Federal Communications Commission  
445 12th Street, SW,  
Washington, D.C. 20554

March 7, 2011

**Received & Inspected**

**MAR 14 2011**

**FCC Mail Room**

Attn: Marcia Glauberman and Associates

Re: MB Docket # 10-238

Per instructions from Mike Perko and Ms. Glauberman, may I herewith submit comments pertaining to both in-state and in-time zone TV satellite broadcasting; and in passing mention what a great feeling it is to finally find a government agency really interested in our TV problems. We have been searching for over six years to no avail and darn little hope. In short, this community is located in the mountain time zone in central Idaho; and we are assigned to the Pacific Time Zone TV stations located in Spokane, Washington whose program schedule is two hours removed from the Mountain Time stations located in Boise, Idaho. There is one hour on the clock and another in scheduled times of programs in Boise. No station puts on air signals into this area which is the deepest canyon in North America with a town in it. As former owner of the canyon's only cable system, may I assure you that satellite signals are the only ones worth watching with good quality reception. The cable has degenerated, four owners later, from what was reasonably watchable fringe area reception, to virtually not watchable most of the time. I should mention that the cable system carried the Boise, Idaho stations for years as Boise is where our people actually go to shop (135 miles to Boise/ 220 miles to Spokane, Washington).

I will attempt to follow the format of your form DA10-2227. Beginning with the Nielsen Designated Market Area system devised years before satellite broadcasting came on the scene: their surveys asked the wrong question, to wit: "What do you watch?" The question never was What would you like to watch? The DMA system did what it was expected to do, namely point out what stations had the most viewership in the counties of the several states. Using this DMA system a price structure was arrived at by the stations giving them a basis for advertising rates to their customers. There has been virtually no public input since. When the need to regulate the satellite broadcasters arose, the congress simply high-jacked the existing DMA system and imposed it on the new satellite broadcasters. In-state or in-time zone situations were not considered as near as we can tell. In Section 304 (3) you ask whether there are alternative methods to DMA which will produce better results. In a word, YES!! First one must stop thinking in terms of Counties and adopt a system that will provide input from much smaller market areas. Cities and towns should be paramount; and opinion poles should be taken periodically from these smaller areas. Input should be made mandatory to satellite broadcasters where their "footprint" can cover a given area. Time ~~now~~ for congress to again hi-jack an existing system; the Postal Zip Code Areas. Mandate that the satellite broadcasters cover designated Zip Code areas without regard to DMA designations. In this manner, both in-state and in-time zone considerations can be addressed. Without a mandate from you and the congress, some satellite distributors will do the same as they have for years, namely, lie about the limitations of their "spot beams" which are to some degree true; but not always. This town, for example, is covered by the Dish Boise Channels; but that is denied by Dish. Being an electronics technician

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since 1952, I am reasonable familiar with satellite limitations. I do acknowledge that the satellite broadcasters can regulate their signal outputs right down to each individual receiver in any given location they cover; but the choice should be with the subscribers. With a market designation to work with like Zip Codes, coverage requirements should be considerably simpler. One alternative mentioned was to enable two sets of stations to broadcast into the same area for better viewer choices. With Zip Code designations, a Zip area could be split and a percentage given to each covering group of stations. The satellite firms can easily determine who is watching what, and provide that information to the stations. AT present, Dish carries all the Spokane, Washington stations in two separate sections of their menu. One of these could easily be converted to all the Boise stations with no adjustments needed except to replace the old style dishes with the newer ones. Subscribers would gladly pay for the change.

Section 304(2): Second paragraph - as above, please stop thinking in DMA and/or County terms. Go to a system giving you local city/town geographic areas. Drop the DMA system completely. Counties can do better with zip code areas. Idaho County has eight zip codes in two time zones. North of the time zone mid-state dividing line, only one county is covered by one CBS affiliate (Nez Perce County). All the rest are in the Spokane, Washington "DMA", and receive virtually NO Idaho news or sports coverage at all. This could be easily cured with zip-code designations for in-state and/or in-time zone broadcasting. Please consider all the items mentioned in the last sentence of this paragraph. I think I have pretty well covered this section as well as Section 304(3). I do hope I have convinced you that time zones can sometimes be equally important as state lines in your deliberations. Lastly, may I again emphasize that the satellite providers must be required to carry out these changes. If they refuse or show reluctance, maybe they should be reminded who actually "owns" the airways.

Thanking you in advance for your consideration and help, I remain,

Sincerely,



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