

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Amendment of Section 73.622(i))
Post-Transition Table of DTV Allotments)
Television Broadcast Stations)
(Hampton-Norfolk, Virginia; Norfolk, Virginia-)
Elizabeth City, North Carolina))

MB Docket No. 11-139
RM-11636 FILED/ACCEPTED

SEP 30 2011

Federal Communications Commission
Office of the Secretary

To: Office of Secretary
Attn: Chief, Video Division, Media Bureau

COMMENTS IN OPPOSITION TO PROPOSAL

By its attorneys and pursuant to Section 1.415 of the Commission’s Rules, Charter Communications (“Charter” or the “Company”) hereby submits Comments in opposition to the community of license change proposed in the above-referenced Notice of Proposed Rulemaking (“NPRM”).¹ By its NPRM released August 17, 2011, the Commission seeks comment on the proposal of Hampton Roads Educational Telecommunications Association (“HRETA”) to amend the Digital Television Table of Allocations in order to change the community of license assigned to its television station WHRO-TV (Channel 16) (“WHRO-TV”) from Hampton-Norfolk, Virginia to Norfolk, Virginia-Elizabeth City, North Carolina. The proposed change to the Table of Allocations is contrary to established Commission policy and the public interest. The

¹ *In the Matter of Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Television Broadcast Stations (Hampton-Norfolk, Virginia; Norfolk, Virginia-Elizabeth City, North Carolina)*, Notice of Proposed Rule Making, MB Docket No. 11-139, RM-11636, DA 11-1401, rel. Aug. 17, 2011. Notice of this proposed rule making was given by publication in the Federal Register on August 31, 2011, 76 FR 54189, which established September 30, 2011 as the deadline for comments. Accordingly, these Comments are timely filed.

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Commission disfavors the use of hyphenated allotments, and proponents of such allocations face the high hurdle of making a compelling showing that such an unusual allotment is warranted. In this case, HRETA made no showing whatsoever – let alone a compelling one – that a hyphenated allotment is justified, nor could it, given that Elizabeth City, North Carolina and Norfolk, Virginia are two disparate and independent communities that are nearly 45 miles apart. While the rulemaking should be rejected on that basis alone, HRETA’s proposal is further deficient as it would ultimately fail to bring any new service to the community of Elizabeth City. HRETA proposes no change to its current technical operations, no change to its coverage area, and no specific change to its programming. In sum, HRETA’s proposed city of license hyphenation evinces no real commitment to serve the community of Elizabeth City, North Carolina. Accordingly, the proposal should be rejected and the rulemaking denied.

DISCUSSION

Notwithstanding HRETA’s focus on technical compliance with Section 1.420(i) of the Commission’s Rules,² it has utterly ignored the fact that the community of license change it seeks is contrary to established Commission policy and inconsistent with the public interest.³ The Commission has long disfavored the use of hyphenated allotments, and requires a compelling showing by the petitioner that such an unusual allotment is justified based on the unique facts involved. In denying a proposal for a hyphenated television allocation to the communities of Bryan and College Station, Texas (just over 4 miles apart), the Commission made clear that “Petitioners who seek hyphenated allotments must make a *very compelling*

² Section 1.420(i) requires that i) the new allotment be mutually exclusive with the existing allotment; ii) the reallocation result in a preferential arrangement of allotments under the Commission’s television allotment priorities; and iii) the change not deprive a community of its sole existing broadcast service. 47 C.F.R. § 1.420(i).

³ HRETA Petition for Rulemaking at 2-4 (“*HRETA Petition*”).

showing... to justify that such action be taken.”⁴ In fact, the Commission has permitted hyphenated allotments only in very limited circumstances, none of which are present here. In the NPRM soliciting comments on the proposal for a hyphenated allotment in the *Bryan and College Station, Texas* case, the Commission explained:

Generally the Commission refrains from making hyphenated allotments. In the past, we have done so only where it appeared that the communities should be treated as one due to: (1) common interest and mutual economic, cultural, and social interdependence; (2) a showing that neither of the communities could alone support a station; or (3) in order to determine close questions of fact at the hearing stage.⁵

The instant situation does not involve a comparative hearing (which no longer exist) for a new allotment. Nor does it involve a situation with two communities that alone could not support a television station, as there are currently three television stations licensed to Norfolk in addition to WHRO-TV.⁶ The only possible basis for employing a hyphenated allotment in this case would be if HRETA made a *very compelling* showing that the communities of Norfolk and Elizabeth City should be treated as one community based on common interests and mutual economic, cultural, and social interdependence. Here, HRETA has failed to make *any* showing that

⁴ *In the Matter of Amendment of Section 73.606(b), Table of Allotments, Television Broadcast Stations (Bryan and College Station, Texas)*, Report and Order, 3 FCC Rcd 2263 (MMB 1988) (emphasis added).

⁵ *In the Matter of Amendment of Section 73.606(b), Table of Allotments, Television Broadcast Stations (Bryan and College Station, Texas)*, Notice of Proposed Rule Making, 2 FCC Rcd 3420 (MMB 1987); *see also, In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Moscow, Ohio, etc.)*, Report and Order, 4 FCC Rcd 3441 (MMB 1988)(rejecting a proposal for a hyphenated allotment, stating that “in the absence of a showing that each community could not support a station, we will not make a hyphenated allotment”); *In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Eagle Nest-Angel Fire, New Mexico)*, Report and Order, 4 FCC Rcd 3441 (MMB 1988)(rejecting proposal for a hyphenated allocation based on the failure to show interdependence of the two communities despite the fact that the communities were proximate to one another and both dependent on tourism).

⁶ WPXTV-TV, WTKR(TV), and WTVZ-TV are all licensed to Norfolk, Virginia.

hyphenating the two distant and disparate communities of Elizabeth City, North Carolina and Norfolk, Virginia is appropriate or justified in this case. HRETA provides no basis whatsoever for employing a hyphenated allotment and, as discussed in more detail below, the facts do not support such a showing in this case in any event.

Unlike Norfolk and Hampton, Virginia, which are located just nine miles apart and together form the core of the southeastern region of Virginia known as Hampton Roads, there is no specific nexus between Norfolk, Virginia, and the proposed community of Elizabeth City, North Carolina. Norfolk and Hampton are located 43 and 52 miles from Elizabeth City, respectively.⁷ And although HRETA could argue that Elizabeth City, North Carolina is part of the geographically large Norfolk-Portsmouth-Newport News, Virginia television DMA, this is not dispositive in the context of a hyphenated community of license determination. Elizabeth City is *not* part of the Virginia Beach-Norfolk-Newport News, VA-NC Metropolitan Statistical Area as defined by the Office of Management and Budget.⁸ Similarly, neither the Hampton Roads Chamber of Commerce, nor the Hampton Roads Economic Development Alliance consider Elizabeth City, North Carolina to be part of the Hampton Roads, Virginia economic and business area.⁹ This is consistent with the fact that, as HRETA itself points out,¹⁰ Elizabeth City,

⁷ See Exhibit 1 attached hereto providing distance between Norfolk and Hampton, Virginia, respectively, and Elizabeth City, North Carolina, as calculated by <http://www.indo.com/distance/>. To put this in perspective, these distances exceed the distance from Washington, D.C. to Baltimore, Maryland. See Exhibit 2 attached hereto providing distance between Washington, D.C. and Baltimore, MD as calculated by <http://www.indo.com/distance/>.

⁸ See Exhibit 3 attached hereto containing the relevant portions of the available December 2009 Office of Management and Budget Metropolitan and Micropolitan Statistical Areas and Components. As shown therein, the MSA is composed of 15 cities or counties located in Virginia and one county – Currituck County – located in North Carolina.

⁹ See Exhibit 4 and Exhibit 5 attached hereto providing relevant pages from the Hampton Roads Chamber of Commerce website, and the Hampton Roads Economic Development Alliance website, respectively, in which these business development organizations each define

North Carolina, is a Micropolitan Statistical Area unto itself.¹¹ Elizabeth City is a discrete, independent city with its own government, city council, and city manager. It is a relatively small city with a population of 18,683, covering less than 10 square miles.¹² Elizabeth City has its own Chamber of Commerce, and its economy focuses on two local colleges, a large U.S. Coast Guard base, and the agriculture and aquaculture in the surrounding counties of North Carolina.¹³ In contrast, Norfolk, Virginia, is the center of the Hampton Roads market and the Virginia Beach-Norfolk-Newport News, VA-NC Metropolitan Statistical Area. Norfolk is a large city with a population of over 242,000¹⁴ and together with Hampton, Virginia Beach, and Portsmouth, forms a single, large urban area. In short, there is simply no support for a finding that the social, cultural, economic, and trade interests of these two distant cities are so integrally entwined that they should be treated as a single community.

While this failure to justify the use of a hyphenated allotment alone is fatal to the proposed community of license change, HRETA's proposal is further deficient in that it would bring no new service to Elizabeth City. As HRETA makes clear in its Petition, *WHRO-TV's*

the scope of the Hampton Roads economic area. As shown in these pages, Elizabeth City, North Carolina is conspicuously absent from either organization's definition of Hampton Roads, as are any other North Carolina communities.

¹⁰ HRETA notes that Elizabeth City is the center of the Elizabeth City Micropolitan Statistical Area and states that it is "a major city obviously deserving of a local television broadcast station." HRETA Petition at 3.

¹¹ See Exhibit 3 attached hereto containing the relevant portions of the December 2009 OMB Metropolitan and Micropolitan Statistical Areas and Components. The Elizabeth City, North Carolina Micropolitan Statistical Area consists of three counties in North Carolina – Camden, Pasquotank, and Perquimans.

¹² See factfinder2.census.gov, the relevant pages of which are attached hereto as Exhibit 6.

¹³ See <http://www.elizabethcitychamber.org>, the relevant pages of which are attached hereto as Exhibit 7.

*transmitter site and facilities will not be improved, upgraded, or expanded in any way.*¹⁵ The Station's contours and the population served will remain unchanged.¹⁶ Perhaps most importantly, HRETA states that its programming "will not change, except to the extent needed to serve the needs of Elizabeth City."¹⁷ Yet, HRETA has failed to identify the particular needs of Elizabeth City or any specific proposed programming changes targeting such needs. Specifically, WHRO-TV has made no commitment to originate local programming from Elizabeth City, to cover news, events, and public affairs from that community in a manner that is any different from any coverage currently provided, or to provide any kind of specific programming tailored to that community's needs and interests. Nor has HRETA committed to maintaining any physical presence, such as a satellite office or studio, in the distant community of Elizabeth City.¹⁸

To the contrary, WHRO-TV has been proudly, historically, and unswervingly dedicated to serving the related communities of Norfolk and Hampton, Virginia for nearly 50 years.¹⁹ Given this history, it is hard to imagine that HRETA would undermine or dilute its commitment to the Hampton Roads area in order to focus on a wholly independent city located approximately 45 miles away in another state. Added to the lack of evidence necessary to justify the use of a

¹⁵ HRETA Petition at 2.

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ According to its web site, HRETA's current headquarters are located in Norfolk with a satellite office and studio further up the peninsula (and away from North Carolina) in Williamsburg, Virginia. See <http://whro.org>, the relevant pages of which are attached hereto as Exhibit 9.

¹⁹ As its very name and call letters attest, from its inception, WHRO-TV has existed to serve Hampton Roads, Virginia, and its mission statement, annual report, and web site all demonstrate that serving the communities of Hampton and Norfolk is the station's unrelenting focus. See <http://whro.org>, the relevant pages of which are attached hereto as Exhibit 9.

hyphenated allotment, HRETA's failure to identify precisely how it intends to serve the community of Elizabeth City dictates that the proposed city of license change must be denied.

There is simply no logical reason that a television station would seek to serve the politically, economically, and geographically separate communities of Norfolk, Virginia and Elizabeth City, North Carolina, particularly when it is not proposing to change either its facilities or service. Perhaps the only discernable reason for HRETA to pursue its flawed proposal would be to gain mandatory carriage rights for WHRO-TV on a cable system serving certain North Carolina communities where it currently has no such rights. Indeed, in *Hampton Roads v. Charter* the Commission denied HRETA's complaint for carriage on Charter's Manteo, North Carolina cable system based on the fact that the system's headend is beyond WHRO-TV's service contour and farther than 50 miles from the Station's cities of license – Norfolk and Hampton.²⁰ The Commission has established that a cable operator may not designate a principal headend location for the purpose of circumventing its must carry obligations.²¹ It would be perverse to permit a station to essentially circumvent a Commission signal carriage order by manipulating the Table of Allocations for the purpose of gaining mandatory carriage rights beyond its service contour. This is especially true where such a proposed community of license change is so patently contrary to Commission precedent and the public interest.

²⁰ See *Complaint of Hampton Roads Educational Telecommunications Association, Inc. v. Charter Communications, Inc.*, 24 FCC Rcd. 14390 (2009) ("*Hampton Roads v. Charter*").

²¹ See, e.g., 47 C.F.R. § 76.5(pp)(2); *Implementation of the Cable Television Consumer Protection and Competition Act of 1992, Broadcast Signal Carriage Issues*, 8 FCC Rcd. 2965 at ¶ 9 (1993). See also *Hampton Roads v. Charter*, at ¶ 6.

CONCLUSION

Ultimately, HRETA has failed to make a compelling showing that the use of a hyphenated allotment is justified in this case, nor could it do so based on the facts. Accordingly, the proposal should be rejected and the NPRM denied.

Respectfully submitted,

Charter Communications

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September 30, 2011

Its Attorneys

EXHIBIT 1


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Distance between **Norfolk, Virginia, United States** and **Elizabeth City, North Carolina, United States**, as the crow flies:

43 miles (70 km) (38 nautical miles)

Initial heading from Norfolk to Elizabeth City:

south (178.2 degrees)

Initial heading from Elizabeth City to Norfolk:

north (358.2 degrees)

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Norfolk, Virginia, US [[hotels](#), [attractions](#), [books](#), [community](#), [map](#)]

city: **Norfolk city**

Location: **36:55:24N 76:14:42W**

Population (1990): **261229**

Elevation: **10 feet**

Elizabeth City, North Carolina, US [[hotels](#), [attractions](#), [books](#), [community](#), [map](#)]

County: **Pasquotank County**

Location: **36:17:46N 76:13:14W**

Population (1990): **14292**

Elevation: **10 feet**

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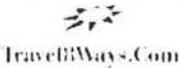
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Distance between **Hampton, Virginia, United States** and **Elizabeth City, North Carolina, United States**, as the crow flies:

52 miles (84 km) (46 nautical miles)

Initial heading from Hampton to Elizabeth City:
south (175.7 degrees)

Initial heading from Elizabeth City to Hampton:
north (355.7 degrees)

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Hampton, Virginia, US [[hotels](#), [attractions](#), [books](#), [community](#), [map](#)]

city: **Hampton city**
Location: **37:03:19N 76:17:31W**
Population (1990): **133793**
Elevation: **10 feet**

Elizabeth City, North Carolina, US [[hotels](#), [attractions](#), [books](#), [community](#), [map](#)]

County: **Pasquotank County**
Location: **36:17:46N 76:13:14W**
Population (1990): **14292**
Elevation: **10 feet**

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EXHIBIT 2



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Initial heading from Baltimore to Washington:
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Washington, District of Columbia, US [[hotels](#), [attractions](#), [books](#), [community](#), [map](#)]

Columbia: **District of Columbia**
Location: **38:54:18N 77:00:58W**
Population (1990): **606900**

Baltimore, Maryland, US [[hotels](#), [attractions](#), [books](#), [community](#), [map](#)]

city: **Baltimore city**
Location: **39:18:03N 76:36:38W**
Population (1990): **736014**
Elevation: **100 feet**

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EXHIBIT 3

METROPOLITAN AND MICROPOLITAN STATISTICAL AREAS AND COMPONENTS, December 2009, WITH CODES

(Metropolitan and micropolitan statistical areas, and metropolitan divisions defined by the Office of Management and Budget, December 2009)

Source: U.S. Census Bureau, Population Division
 Internet Release Date: September 2010
 Last Revised:

CBSA Code	Div Code	FIPS State/County	CBSA and Division Titles and Components
10020			Abbeville, LA Micropolitan Statistical Area
10020		22113	Vermilion Parish, LA
10100			Aberdeen, SD Micropolitan Statistical Area
10100		46013	Brown County, SD
10100		46045	Edmunds County, SD
10140			Aberdeen, WA Micropolitan Statistical Area
10140		53027	Grays Harbor County, WA
10180			Abilene, TX Metropolitan Statistical Area
10180		48059	Callahan County, TX
10180		48253	Jones County, TX
10180		48441	Taylor County, TX
10220			Ada, OK Micropolitan Statistical Area
10220		40123	Pontotoc County, OK
10260			Adjuntas, PR Micropolitan Statistical Area
10260		72001	Adjuntas Municipio, PR
10300			Adrian, MI Micropolitan Statistical Area
10300		26091	Lenawee County, MI
10380			Aguadilla-Isabela-San Sebastián, PR Metropolitan Statistical Area
10380		72003	Aguada Municipio, PR
10380		72005	Aguadilla Municipio, PR
10380		72011	Añasco Municipio, PR
10380		72071	Isabela Municipio, PR
10380		72081	Lares Municipio, PR
10380		72099	Moca Municipio, PR
10380		72117	Rincón Municipio, PR
10380		72131	San Sebastián Municipio, PR
10420			Akron, OH Metropolitan Statistical Area
10420		39133	Portage County, OH
10420		39153	Summit County, OH
10460			Alamogordo, NM Micropolitan Statistical Area
10460		35035	Otero County, NM
10500			Albany, GA Metropolitan Statistical Area
10500		13007	Baker County, GA
10500		13095	Dougherty County, GA
10500		13177	Lee County, GA
10500		13273	Terrell County, GA
10500		13321	Worth County, GA
10540			Albany-Lebanon, OR Micropolitan Statistical Area
10540		41043	Linn County, OR
10580			Albany-Schenectady-Troy, NY Metropolitan Statistical Area
10580		36001	Albany County, NY
10580		36083	Rensselaer County, NY
10580		36091	Saratoga County, NY
10580		36093	Schenectady County, NY
10580		36095	Schoharie County, NY
10620			Albemarle, NC Micropolitan Statistical Area
10620		37167	Stanly County, NC
10660			Albert Lea, MN Micropolitan Statistical Area
10660		27047	Freeborn County, MN
10700			Albertville, AL Micropolitan Statistical Area
10700		01095	Marshall County, AL
10740			Albuquerque, NM Metropolitan Statistical Area
10740		35001	Bernalillo County, NM
10740		35043	Sandoval County, NM
10740		35057	Torrance County, NM
10740		35061	Valencia County, NM
10760			Alexander City, AL Micropolitan Statistical Area
10760		01037	Coosa County, AL
10760		01123	Tallapoosa County, AL
10780			Alexandria, LA Metropolitan Statistical Area
10780		22043	Grant Parish, LA
10780		22079	Rapides Parish, LA
10820			Alexandria, MN Micropolitan Statistical Area
10820		27041	Douglas County, MN
10860			Alice, TX Micropolitan Statistical Area
10860		48249	Jim Wells County, TX
10880			Allegan, MI Micropolitan Statistical Area
10880		26005	Allegan County, MI

19980		Dodge City, KS Micropolitan Statistical Area
19980	20057	Ford County, KS
20020		Dothan, AL Metropolitan Statistical Area
20020	01061	Geneva County, AL
20020	01067	Henry County, AL
20020	01069	Houston County, AL
20060		Douglas, GA Micropolitan Statistical Area
20060	13003	Atkinson County, GA
20060	13069	Coffee County, GA
20100		Dover, DE Metropolitan Statistical Area
20100	10001	Kent County, DE
20140		Dublin, GA Micropolitan Statistical Area
20140	13167	Johnson County, GA
20140	13175	Laurens County, GA
20180		DuBois, PA Micropolitan Statistical Area
20180	42033	Clearfield County, PA
20220		Dubuque, IA Metropolitan Statistical Area
20220	19061	Dubuque County, IA
20260		Duluth, MN-WI Metropolitan Statistical Area
20260	27017	Carlton County, MN
20260	27137	St. Louis County, MN
20260	55031	Douglas County, WI
20300		Dumas, TX Micropolitan Statistical Area
20300	48341	Moore County, TX
20340		Duncan, OK Micropolitan Statistical Area
20340	40137	Stephens County, OK
20380		Dunn, NC Micropolitan Statistical Area
20380	37085	Harnett County, NC
20420		Durango, CO Micropolitan Statistical Area
20420	08067	La Plata County, CO
20460		Durant, OK Micropolitan Statistical Area
20460	40013	Bryan County, OK
20500		Durham-Chapel Hill, NC Metropolitan Statistical Area
20500	37037	Chatham County, NC
20500	37063	Durham County, NC
20500	37135	Orange County, NC
20500	37145	Person County, NC
20540		Dyersburg, TN Micropolitan Statistical Area
20540	47045	Dyer County, TN
20580		Eagle Pass, TX Micropolitan Statistical Area
20580	48323	Maverick County, TX
20620		East Liverpool-Salem, OH Micropolitan Statistical Area
20620	39029	Columbiana County, OH
20660		Easton, MD Micropolitan Statistical Area
20660	24041	Talbot County, MD
20700		East Stroudsburg, PA Micropolitan Statistical Area
20700	42089	Monroe County, PA
20740		Eau Claire, WI Metropolitan Statistical Area
20740	55017	Chippewa County, WI
20740	55035	Eau Claire County, WI
20780		Edwards, CO Micropolitan Statistical Area
20780	08037	Eagle County, CO
20780	08065	Lake County, CO
20820		Effingham, IL Micropolitan Statistical Area
20820	17049	Effingham County, IL
20900		El Campo, TX Micropolitan Statistical Area
20900	48481	Wharton County, TX
20940		El Centro, CA Metropolitan Statistical Area
20940	06025	Imperial County, CA
20980		El Dorado, AR Micropolitan Statistical Area
20980	05139	Union County, AR
21020		Elizabeth City, NC Micropolitan Statistical Area
21020	37029	Camden County, NC
21020	37139	Pasquotank County, NC
21020	37143	Perquimans County, NC
21060		Elizabethtown, KY Metropolitan Statistical Area
21060	21093	Hardin County, KY
21060	21123	Larue County, KY
21120		Elk City, OK Micropolitan Statistical Area
21120	40009	Beckham County, OK
21140		Elkhart-Goshen, IN Metropolitan Statistical Area

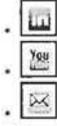
46180	28057	Itawamba County, MS
46180	28081	Lee County, MS
46180	28115	Pontotoc County, MS
46220		Tuscaloosa, AL Metropolitan Statistical Area
46220	01063	Greene County, AL
46220	01065	Hale County, AL
46220	01125	Tuscaloosa County, AL
46260		Tuskegee, AL Micropolitan Statistical Area
46260	01087	Macon County, AL
46300		Twin Falls, ID Micropolitan Statistical Area
46300	16053	Jerome County, ID
46300	16083	Twin Falls County, ID
46340		Tyler, TX Metropolitan Statistical Area
46340	48423	Smith County, TX
46380		Ukiah, CA Micropolitan Statistical Area
46380	06045	Mendocino County, CA
46420		Union, SC Micropolitan Statistical Area
46420	45087	Union County, SC
46460		Union City, TN-KY Micropolitan Statistical Area
46460	21075	Fulton County, KY
46460	47131	Obion County, TN
46500		Urbana, OH Micropolitan Statistical Area
46500	39021	Champaign County, OH
46540		Utica-Rome, NY Metropolitan Statistical Area
46540	36043	Herkimer County, NY
46540	36065	Oneida County, NY
46580		Utuaado, PR Micropolitan Statistical Area
46580	72141	Utuaado Municipio, PR
46620		Uvalde, TX Micropolitan Statistical Area
46620	48463	Uvalde County, TX
46660		Valdosta, GA Metropolitan Statistical Area
46660	13027	Brooks County, GA
46660	13101	Echols County, GA
46660	13173	Lanier County, GA
46660	13185	Lowndes County, GA
46700		Vallejo-Fairfield, CA Metropolitan Statistical Area
46700	06095	Solano County, CA
46740		Valley, AL Micropolitan Statistical Area
46740	01017	Chambers County, AL
46780		Van Wert, OH Micropolitan Statistical Area
46780	39161	Van Wert County, OH
46820		Vermillion, SD Micropolitan Statistical Area
46820	46027	Clay County, SD
46860		Vernal, UT Micropolitan Statistical Area
46860	49047	Uintah County, UT
46900		Vernon, TX Micropolitan Statistical Area
46900	48487	Wilbarger County, TX
46980		Vicksburg, MS Micropolitan Statistical Area
46980	28149	Warren County, MS
47020		Victoria, TX Metropolitan Statistical Area
47020	48057	Calhoun County, TX
47020	48175	Goliad County, TX
47020	48469	Victoria County, TX
47080		Vidalia, GA Micropolitan Statistical Area
47080	13209	Montgomery County, GA
47080	13279	Toombs County, GA
47180		Vincennes, IN Micropolitan Statistical Area
47180	18083	Knox County, IN
47220		Vineland-Millville-Bridgeton, NJ Metropolitan Statistical Area
47220	34011	Cumberland County, NJ
47260		Virginia Beach-Norfolk-Newport News, VA-NC Metropolitan Statistical Area
47260	37053	Currituck County, NC
47260	51073	Gloucester County, VA
47260	51093	Isle of Wight County, VA
47260	51095	James City County, VA
47260	51115	Mathews County, VA
47260	51181	Surry County, VA
47260	51199	York County, VA
47260	51550	Chesapeake city, VA
47260	51650	Hampton city, VA
47260	51700	Newport News city, VA
47260	51710	Norfolk city, VA
47260	51735	Poquoson city, VA
47260	51740	Portsmouth city, VA
47260	51800	Suffolk city, VA
47260	51810	Virginia Beach city, VA

47260	51830	Williamsburg city, VA
47300		Visalia-Porterville, CA Metropolitan Statistical Area
47300	06107	Tulare County, CA
47340		Wabash, IN Micropolitan Statistical Area
47340	18169	Wabash County, IN
47380		Waco, TX Metropolitan Statistical Area
47380	48309	McLennan County, TX
47420		Wahpeton, ND-MN Micropolitan Statistical Area
47420	27167	Wilkin County, MN
47420	38077	Richland County, ND
47460		Walla Walla, WA Micropolitan Statistical Area
47460	53071	Walla Walla County, WA
47500		Walterboro, SC Micropolitan Statistical Area
47500	45029	Colleton County, SC
47540		Wapakoneta, OH Micropolitan Statistical Area
47540	39011	Auglaize County, OH
47580		Warner Robins, GA Metropolitan Statistical Area
47580	13153	Houston County, GA
47620		Warren, PA Micropolitan Statistical Area
47620	42123	Warren County, PA
47660		Warrensburg, MO Micropolitan Statistical Area
47660	29101	Johnson County, MO
47700		Warsaw, IN Micropolitan Statistical Area
47700	18085	Kosciusko County, IN
47780		Washington, IN Micropolitan Statistical Area
47780	18027	Daviess County, IN
47820		Washington, NC Micropolitan Statistical Area
47820	37013	Beaufort County, NC
47900		Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area
47900	13644	Bethesda-Rockville-Frederick, MD Metropolitan Division
47900	13644	24021 Frederick County, MD
47900	13644	24031 Montgomery County, MD
47900	47894	Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Division
47900	47894	11001 District of Columbia, DC
47900	47894	24009 Calvert County, MD
47900	47894	24017 Charles County, MD
47900	47894	24033 Prince George's County, MD
47900	47894	51013 Arlington County, VA
47900	47894	51043 Clarke County, VA
47900	47894	51059 Fairfax County, VA
47900	47894	51061 Fauquier County, VA
47900	47894	51107 Loudoun County, VA
47900	47894	51153 Prince William County, VA
47900	47894	51177 Spotsylvania County, VA
47900	47894	51179 Stafford County, VA
47900	47894	51187 Warren County, VA
47900	47894	51510 Alexandria city, VA
47900	47894	51600 Fairfax city, VA
47900	47894	51610 Falls Church city, VA
47900	47894	51630 Fredericksburg city, VA
47900	47894	51683 Manassas city, VA
47900	47894	51685 Manassas Park city, VA
47900	47894	54037 Jefferson County, WV
47920		Washington Court House, OH Micropolitan Statistical Area
47920	39047	Fayette County, OH
47940		Waterloo-Cedar Falls, IA Metropolitan Statistical Area
47940	19013	Black Hawk County, IA
47940	19017	Bremer County, IA
47940	19075	Grundy County, IA
47980		Watertown, SD Micropolitan Statistical Area
47980	46029	Codington County, SD
47980	46057	Hamlin County, SD
48020		Watertown-Fort Atkinson, WI Micropolitan Statistical Area
48020	55055	Jefferson County, WI
48060		Watertown-Fort Drum, NY Micropolitan Statistical Area
48060	36045	Jefferson County, NY
48100		Wauchula, FL Micropolitan Statistical Area
48100	12049	Hardee County, FL
48140		Wausau, WI Metropolitan Statistical Area
48140	55073	Marathon County, WI
48180		Waycross, GA Micropolitan Statistical Area
48180	13229	Pierce County, GA
48180	13299	Ware County, GA
48220		Weatherford, OK Micropolitan Statistical Area
48220	40039	Custer County, OK
48300		Wenatchee-East Wenatchee, WA Metropolitan Statistical Area

EXHIBIT 4

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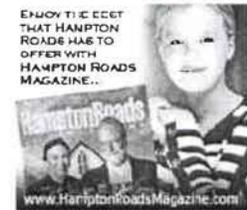
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Hampton Roads is the name for the southeastern region of Virginia. The region's most notable geographic characteristic is proximity to a variety of waterways. Bordered on the east by the Atlantic Ocean, Hampton Roads is where the James, Nansemond and Elizabeth rivers pour into the mouth of the Chesapeake Bay. "Hampton Roads" is a nautical term meaning "protected anchorage" or "a safe harbor." With the world's largest natural harbor, Hampton Roads' ports have played an important role in the region's history and economy.

Hampton Roads is ranked the 31st largest Metropolitan Statistical Area (MSA) in the United States. Recently recognized by a University of Wisconsin study as the nation's most diverse region, the region is home to 1.6 million people and includes the cities of Chesapeake, Franklin, Hampton, Newport News, Norfolk, Poquoson, Portsmouth, Suffolk, Virginia Beach, and Williamsburg, and the counties of Gloucester, Isle of Wight, James City, Mathews, Southampton, Surry and York, and Currituck in North Carolina.

Hampton Roads is the birthplace of Colonial America. It is home to Jamestown, the first permanent English settlement, and to Colonial Williamsburg. Its rich history, thriving maritime industry, and beautiful waterfront landscapes merge with livable communities, modern technology, economic prosperity, and a strong military presence to create a unique and welcoming place in which to live and do business.

View the Chamber members participating in the 2011 Map Project. You can find them listed in the Business Locator section of MapLocator! This online companion to the flat map includes a category listing, pinpoint on the map and more information about each Member. If you would like a flat map, please contact the Chamber at (757) 622-2312 and one can be provided to you free for pickup at our Chamber offices located at 500 East Main Street, Suite 700 Norfolk, VA 23510.

All other requests go to the Chamber Shop at Shop.HamptonRoadsChamber.com to order your maps online.

Whether you are visiting the area or reside here, we encourage you to take advantage of all Hampton Roads has to offer.



The Hampton Roads Chamber of Commerce has members from throughout the region, however, our service is focused on the five southside cities:

Headquarters
Hampton Roads Chamber of Commerce
500 E Main Street, Suite 700
Norfolk, VA 23510
Telephone: (757) 622-2312

Select a city for more information:

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Hampton Roads Chamber of Commerce - in Business Since 1801 - serving [Chesapeake](#), [Norfolk](#), [Forsyth](#), [Suffolk](#), and [Virginia Beach](#) - 501 East Main Street • Suite 700 • Norfolk, Va 23510

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Hampton Roads continues its 400-year tradition of being a center of commerce.

For many businesses it is critical that they be conveniently located near customers, suppliers, distributors, employees, and vendors. Fortunately for the businesses in Hampton Roads, very few regions are as strategically located to as many major metropolitan areas as we are. In fact, over 60 percent of the population of the United States is within 750 miles of Hampton Roads, and the region's convenient and accessible transportation infrastructure provides multiple options for moving goods between national and international markets.

Whether traveling for business or pleasure, you'll enjoy the modern convenience of our two airports, Norfolk International (ORF) and Newport News/Williamsburg International (PHF). Together they handle over four million domestic and international passengers annually aboard eight major airlines averaging 226 flights per day.

Even data travels quickly in and through Hampton Roads. Our telecom infrastructure supports the communications needs of much of the East Coast, and includes 11 independent networks supported by over 650,000 miles of fiber optics.

Other Amenities include:

- **A metro area comprised of 15 communities dedicated to your business success**

Cities of [Chesapeake](#), [Franklin](#), [Hampton](#), [Newport News](#), [Norfolk](#), [Pogooson](#), [Portsmouth](#), [Suffolk](#), [Virginia Beach](#) and [Williamsburg](#); and the Counties of [Gloucester](#), [Isle of Wight](#), [James City](#), [Southampton](#) and [York](#).

- **An exceptionally skilled workforce and robust education network**

An 830,000-person-strong labor force replenished annually by 13,000 highly trained, disciplined, exiting military personnel. Over 96,000 students are enrolled in the region's 12 traditional colleges and universities with an estimated 14,000 degrees conferred annually.

- **A mid-Atlantic, coastal location**

Hampton Roads enjoys a mild, temperate coastal climate enhanced by outstanding residential and recreational options, including: expansive shoreline and beaches, amusement/theme parks, museums, performing arts, festivals, professional sports, regional shopping malls and outlet centers, colonial cities and towns, state and national parks, and much, much more.

- **A continually growing international community**

Our [international profile](#) is strong and continues to grow, hosting 180 international firms representing 27 countries. For a list of the major international companies in Hampton Roads, [click here](#).

American business was truly born in Hampton Roads, and our abundant resources make it as easy a choice for today's entrepreneurs and organizations as it was 400 years ago.

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Quality of Place
[Transportation](#)
[Cost of Living](#)

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Area Profile



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"The nation's leading business analysts agree: Virginia is the best state for business."

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