

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)

Fields Cable TV)

Enforcement Complaint Concerning)
WYMT-TV, Hazard, Kentucky and)
WKYT-TV, Lexington, Kentucky)

MB Docket 12-__
CSR _____

To: The Secretary's Office
Attn: The Media Bureau

ENFORCEMENT COMPLAINT

Gray Television Licensee, LLC (“Gray”), licensee of full-power television stations WYMT-TV, Hazard, Kentucky and WKYT-TV, Lexington, Kentucky, (collectively, the “Stations”), by its attorneys, hereby files this Enforcement Complaint against Fields Cable TV (“Fields”). Since May 31, 2012, Fields has retransmitted without Gray’s consent the signals for the Stations on its cable system serving the community of Combs, Kentucky (the “Community”) in the Lexington, Kentucky Designated Market Area (“DMA”) in violation of Section 325(b)(1)(A) of the Communications Act of 1934, as amended (the “Communications Act”), 47 U.S.C. § 325(b)(1)(A), and Section 76.64(a) of the Commission’s rules, 47 C.F.R. § 76.64(a). Moreover, Fields’ conduct over the last several months epitomizes the bad faith behavior that the Commission’s rules prohibit.¹ For several months Fields refused to negotiate for retransmission consent. Indeed, it even went so far as to refuse to accept delivery of Gray’s statutorily-required retransmission consent election notices for the Stations – forcing Gray to ask the local sheriff to hand deliver the notices to Fields. All in all, Fields has ignored Gray’s repeated attempts to

¹ 47 C.F.R. § 76.65(b).

resolve this matter amicably and without Commission involvement. Therefore, Gray seeks an Order compelling Fields to comply with the law and imposing such sanctions on Fields as the Bureau deems appropriate for the operator's bad faith behavior and its knowing, deliberate, and continuing violations of the law.

BACKGROUND

On September 9, 2011, Gray sent to Fields via certified mail retransmission consent election notices for the Stations for the 2012-2014 carriage cycle.² Two weeks later, however, Gray received from the U.S. Post Office notices that Fields refused to claim Gray's statutorily-required election notices. Accordingly, on September 26, 2011, Gray asked the Perry County, Kentucky Sheriff to hand deliver the Stations' retransmission consent election notices to Fields.³

This incident would set the tone for Fields' bad faith dealings with Gray and its refusal to comply with Commission rules. From October 2011 to December 2011, Gray repeatedly reached out to Fields to negotiate a new retransmission agreement to allow Fields to continue to retransmit the Stations after the parties then-existing agreement expired on December 31, 2011. Fields, however, ignored almost all of Gray's overtures until, finally, on December 30, 2011, Fields agreed to extend the parties retransmission consent agreement.⁴ Shortly after signing the extension agreement, Fields breached certain material terms of the agreement and was in default. Accordingly, on April 30, 2012, Gray sent Fields a notice of material breach informing Fields that if it did not cure its default within thirty days – that is, by May 30, 2012 – the parties retransmission consent agreement would terminate.⁵ Fields never responded to that notice. Therefore, on June 1, 2012, Gray sent a follow up letter to Fields, informing it that by the express terms of the parties retransmission consent agreement, the agreement automatically terminated

² See Exhibit A.

³ See Exhibit B.

⁴ Fields' refusal for almost three months to respond to Gray's attempts to negotiate for retransmission consent constitutes a *per se* violation of the good faith bargaining rules. See § 76.65(b)(1).

⁵ See Exhibit C.

effective as of May 30, 2012.⁶ As a result, Fields no longer has Gray's express written consent to retransmit the Stations. Fields has not disputed or responded to any of Gray's communications. Nevertheless, Fields continued to retransmit the Stations' signals on its system.

ARGUMENT

Under the Communications Act and the Commission's rules, cable systems may not retransmit the signal of a television broadcast station without the consent of the broadcaster. Section 325(b) of the Communications Act provides that cable systems and multichannel video programming distributors must obtain the "**express authority** of the originating station" to retransmit the signal of a broadcasting station.⁷ Section 76.64 of the Commission's rules adds the requirements that the originating station's express consent must be in writing and must "specify the extent of the consent being granted."⁸ The Commission has stated that "properly documented retransmission of a television signal without consent would be grounds for imposition of a forfeiture."⁹

The Communications Act requires Fields to obtain Gray's consent to retransmit WYMT-TV and WKYT-TV. Fields' system serving the Community is indisputably a multichannel video programming distributor within the meaning of Section 602 of the Communications Act.¹⁰ Based upon information and belief, it is a facility that is equipped to provide multiple channels of video programming and cable service to multiple subscribers within a community.¹¹ Likewise,

⁶ See Exhibit D.

⁷ 47 U.S.C. § 325(b)(1)(A) (emphasis added). Exceptions to this rule, including those for local commercial stations that elect to assert their must-carry rights, are not applicable here. See 47 U.S.C. §§ 325(b)(1)(B), 534(b).

⁸ 47 C.F.R. §§ 76.64(a), 76.64(i), 76.64(j).

⁹ In the Matter of Implementation of the Cable Television and Consumer Protection and Competition Act of 1992, 8 FCC Rcd 2965, 3005 at para. 175 (1993).

¹⁰ See 47 U.S.C. §§ 522(7), 522(13).

¹¹ Fields cable system serving the Community does not appear in the Commission's Community Unit Identification list. Therefore, it appears that Fields has not registered its system with the FCC as required under FCC rules.

WYMT-TV and WKYT-TV are indisputably broadcasting stations within the meaning of Section 3 of the Communications Act because they are television stations equipped to broadcast television signals to the public.¹² Nielsen Media Research, Inc. has assigned both WYMT-TV and WKYT-TV to the Lexington, Kentucky DMA.¹³ Combs, Kentucky is within the Lexington, Kentucky DMA.

Fields is retransmitting the Stations on its system even though it does not have Gray's express written consent. Under the plain terms of the parties retransmission consent agreement, the agreement terminated on May 30, 2012. Therefore, since May 31, 2012, Fields has not had any authority to retransmit either Station. Fields has not disputed this fact, yet, according to reports Gray has received from viewers in Combs, Kentucky, Fields continues to retransmit both Stations on its system. This behavior is a brazen violation of the Communications Act and the Commission's rules.

Over the last several months, Gray has given Fields multiple opportunities to resolve this matter. All of which, Fields has ignored. Meanwhile, it continues to retransmit the Stations in violation of federal law. As of the date of this Complaint, Fields has retransmitted the Stations without consent for fifty-seven days. As the Bureau recently stated in *Bailey Cable TV, Inc.*, each day that Fields retransmits a Station without consent is a separate violation.¹⁴ Thus, under Commission rules and precedent, the base forfeiture in this instance would be calculated as follows:

Base Forfeiture Amount	Total Days of Violation	Number of Stations	Total Forfeiture Amount
\$7,500	57	2	\$855,000

¹² See 47 U.S.C. §§ 153(5), 153(6); See FCC File Numbers BLCDDT-20040109ACY and BLCDDT-20100902ACB.

¹³ See BIA/Kelsey, *Investing in Television: Market Report 2011* at 61 (identifying DMA assignments applicable to the current carriage cycle).

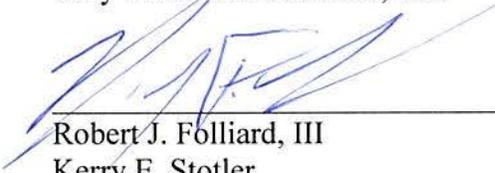
¹⁴ See *Bailey Cable TV, Inc.*, 27 FCC Rcd 2631, 2634 (M.B. 2012).

CONCLUSION

Since May 31, 2012, Fields has retransmitted the Stations' signals on its cable system without Gray's express, written consent. Fields therefore knowingly and willfully violated the Communications Act and the Commission's rules. Gray requests that the Bureau promptly issue an order directing Fields to come into compliance with its obligations with respect to the Stations' signals on its system and imposing such sanctions on Fields as the Bureau deems appropriate.

Respectfully submitted,

Gray Television Licensee, Inc.



Robert J. Folliard, III
Kerry E. Stotler

DOW LOHNES PLLC
1200 New Hampshire Ave., NW
Suite 800
Washington, DC 20036
202-776-2000

Its Attorneys

July 26, 2012

EXHIBIT A

September 2011 Retransmission Consent Election Notice

CABLE-TELCO ELECTION NOTICE

CALL LETTERS	COMMUNITY OF LICENSE	DMA TO WHICH NIELSEN MEDIA RESEARCH ASSIGNED STATION IN 2009-10 NSI
WYMT-TV	HAZARD, KENTUCKY	LEXINGTON
DTV CHANNEL (OVER THE AIR)	PRIMARY CHANNEL (VIRTUAL CHANNEL, E.G., 15.1)	LICENSEE NAME
12	57.1	GRAY TELEVISION LICENSEE, LLC

This Cable Election Notice is sent this 9th day of September, 2011, via Certified Mail/Return Receipt Requested (Receipt Number _____) to the following:
91 7108 2133 3931 3084 2736

Operator: **Rockcastle Cable, Fields Cable, Buckhorn Cable**
 Address: **Attn: James Fields**
P.O. Box 208
Combs, KY 41729

With respect to all communities within the Station's "television market" (as defined in 47 C.F.R. § 76.55(e)) served by cable systems owned or managed by your company (including those listed in our current retransmission consent agreement and including those listed in EXHIBIT A hereto) between January 1, 2012, and December 31, 2014, the Licensee elects the following status for the primary video stream of the Station's digital signal (licensee to check one box below):

- retransmission consent.**

- mandatory carriage ("must-carry") on the following: (check one):**
 - The Station's PSIP major channel number ("virtual channel").
 - The cable channel on which the Station was carried on July 19, 1985.
 - The cable channel on which the Station was carried on January 1, 1992.

Further, we hereby notify you of our election not to renew, extend, or roll-over the term of any of retransmission consent agreement that may be in place between our companies at this time. For further information or to request consent to the retransmission of any program stream to which a "must-carry" election does not apply, please contact:

Name: **Ernestine Cornett**
 Address: **WYMT-TV**
PO Box 1299
Hazard, Kentucky 41702
 Phone: **(606) 436-5757 Extension: 1200**
 Email: **ernestine.cornett@wymtnews.com**

The Licensee provides this Election Notice pursuant to 47 C.F.R. Section 76.64.

Signature: *Ernestine Cornett 9/9/11*
 Name/Title: *General Mgr.*

CABLE-TELCO ELECTION NOTICE

Exhibit A

CALL LETTERS	COMMUNITY OF LICENSE	LICENSEE
WYMT-TV	Hazard, Kentucky	GRAY TELEVISION LICENSEE, LLC

Communities in the Station's television market that are covered by the Cable Election Notice to which this Exhibit A is attached:

County: Perry, KY

Community

Combs
Hazard
Gays Creek

County: Rockcastle, KY

Community

Livingston
Orlando

CABLE-TELCO ELECTION NOTICE

CALL LETTERS	COMMUNITY OF LICENSE	DMA TO WHICH NIELSEN MEDIA RESEARCH ASSIGNED STATION IN 2009-10 NSI
WKYT-TV	LEXINGTON, KY	LEXINGTON
DTV CHANNEL (OVER THE AIR)	PRIMARY CHANNEL (VIRTUAL CHANNEL (DIG. 15.1))	LICENSEE NAME
36	27.1	GRAY TELEVISION LICENSEE, LLC

This Cable Election Notice is sent this 9th day of September 2011 via Certified Mail/Return Receipt Requested (Receipt Number _____) to the following:

Operator: Rockcastle Cable
James Fields
Address: 4102 North St
Combs, KY 41729

With respect to all communities within the Station's "television market" (as defined in 47 C.F.R. § 76.55(e)) served by cable systems owned or managed by your company (including those listed in our current retransmission consent agreement and including those listed in EXHIBIT A hereto) between January 1, 2012, and December 31, 2014, the Licensee elects Retransmission Consent for the primary video stream of the Station's digital signal (licensee to check one box below):

Further, we hereby notify you of our election not to renew, extend, or roll-over the term of any retransmission consent agreement that may be in place between our companies at this time. For further information, please contact:

Name: Mike Kanarek
Sr. V.P.-Broadcast Operations
Address: WKYT-TV
2851 Winchester Rd.
Lexington, KY 40509
Phone: (859) 299-0411
Email: mike.kanarek@wkyt.com

The Licensee provides this Election Notice pursuant to 47 C.F.R. Section 76.64.

Signature:
Name/Title:


Wayne M. Martin
President / General Manager

CABLE-TELCO ELECTION NOTICE

Exhibit A

CALL LETTERS	COMMUNITY OF LICENSE	LICENSEE
WKYT-TV	Lexington, KY	Gray Television Licensee, LLC

Communities in the Station's television market that are covered by the Cable Election Notice to which this Exhibit A is attached:

Gays Creek

Livingston



GRAY TELEVISION, INC.
P.O. BOX 55037
LEXINGTON, KENTUCKY 40555

9-28

9-10

9-14

9-24



7011 0470 0000 9201 4268



- Undeliverable as Addressed
- Moved, Left No Address
- Unclaimed
- Refused
- Attempted, Not Known
- No Such Street
- No Such Number
- No Receptacle
- Deceased
- Vacant



~~James Fieldis
Rockcastle Cable
PO BOX 208
Combs, KY 41729~~

- Undeliverable as Addressed
- Moved, Left No Address
- Unclaimed
- Refused
- Attempted, Not Known
- No Such Street
- No Such Number
- No Receptacle
- Deceased
- Vacant



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

James Fields
 Rockcastle Cable
 PO BOX 208
 Combs, KY 41729

2. Article Number
 (Transfer from service label)

7011 0470 0000 9201 4268

PS Form 3811, February 2004

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Agent Addressee

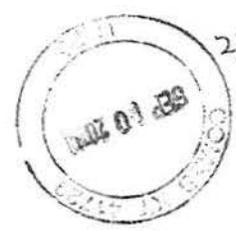
B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.



2ND
 9-14 ✓
 9-24

CERTIFIED MAIL

wyml.tv
P.O. Box 1299
Hazard, KY 41702
www.wyml.news.com



91 7108 2133 3931 3084 2736



9-10
9-14
9-24

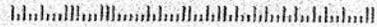
UNC

Field: Cable
P.O.E NIXIE 402 DE 1 00 09/26/11
Combs,

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

EC: 41702129999 *0270-04518-09-45

41702129999



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>Fields Cable P.O. Box 237 Combs, KY 41729</p> </div>		<p>B. Received by (Printed Name) C. Date of Delivery</p>	
<p>2. Article Number <i>(Transfer from service label)</i></p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes if YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>PS Form 3811, August 2001</p>		<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>Domestic Return Receipt</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>2ACPS-03-P-4081</p>		<p>9-14 9-24</p>	

41729
24
AM
2011
SEPT
Combs, KY

9-14
9-24

EXHIBIT B

Perry County, Kentucky Sheriff Confirmation of Delivery

Did not get Return Receipt
back. us... on 9/26/11
we sent letter to Sheriff's
Department & paid \$50.00 to
have it hand delivered!

To: James Fields

PH: (606) 439-4523
Fax: (606) 436-4970



P.O. Box 7309
Hazard, KY 41702

DATE: September 29, 2011

TO: WYMT

FROM: Perry County Sheriff Department

SUBJECT: Paper Delivery - James Fields

To Whom It May Concern:

This letter is to inform you that the paperwork you requested to be served on James Fields was delivered on the 28 day of September, 2011 at 6:28pm.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Sam Mullins'.

Sam Mullins
Deputy
Perry County Sheriff Department

EXHIBIT C

April 30, 2012 Notice of Material Breach and Termination

April 30, 2012

VIA OVERNIGHT COURIER
VIA EMAIL (cableguy01@windstream.net)

James Fields
Fields Cable TV
102 Engle Street
Combs, KY 41739

Re: **Notice of Material Breach and Termination**
WYMT-TV, CBS, Hazard, Kentucky
WKYT-TV, CBS, Lexington, Kentucky
Retransmission Consent Agreement

Dear Mr. Fields:

We represent Gray Television Group, Inc. ("Broadcaster"), which is the owner of television stations WYMT-TV, CBS, Hazard, Kentucky, and WKYT-TV, CBS, Lexington, Kentucky (the "Stations"). On January 1, 2009, Broadcaster entered into a Retransmission Consent Agreement (the "Agreement") with Fields Cable TV ("Operator") granting Operator consent to retransmit the Stations' programming on Operator's cable systems within the Lexington, Kentucky Designated Market Area, including a cable system serving Combs, Kentucky (the "System"). On January 1, 2012, Broadcaster and Operator amended the Agreement to extend its term to December 31, 2014.

We are writing to inform you that Operator is in material breach of the Agreement. Under Section 6 of the Agreement, Operator is required to pay Broadcaster a monthly Retransmission Fee no later than the fifteenth day after the conclusion of the prior month. Any past due payments bear interest at 1.5% per month. Despite these express requirements, Broadcaster has not received any payments for any month during the Term of the Agreement. **Accordingly, we hereby notify Operator that it is in material breach of the Agreement. Unless all defaults (including interest) are fully cured within thirty days of this notice, Broadcaster hereby exercises its right to terminate the Agreement effective May, 30, 2012.**

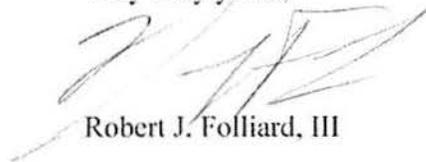
If Operator does not cure its default by May 30, 2012, the Agreement will terminate and Operator no longer will have Broadcaster's consent to retransmit the Stations' programming. Broadcaster will enforce its rights aggressively at the FCC and in state court. As Operator may know, the FCC recently held that carriage of a broadcast station without consent is a serious violation of federal law that could subject Operator to a substantial fine of up to \$7,500 per station per day. *See Bailey Cable TV, Inc.*, DA 12-421 (rel. Mar. 16, 2012).

Notice of Material Breach and Termination
April 30, 2012
Page 2 of 2

If Operator wishes to resolve this matter and cure its default, please contact Ernestine Cornett at WYMT-TV as soon as possible. Ms. Cornett can be reached at 606-436-5757 or Ernestine.cornett@wymtnews.com

This letter shall not constitute a waiver by Broadcaster of any of its rights and remedies under the Agreement, at law, in equity, or otherwise, each of which is expressly reserved. We look forward to your immediate response to this notice.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert J. Folliard, III", is written over a light blue horizontal line.

Robert J. Folliard, III

cc: Ms. Ernestine Cornett (Ernestine.cornett@wymtnews.com)

EXHIBIT D

June 1, 2012 Notice of Termination



Kevin P. Latek
Vice President, Law and Development

June 1, 2012

VIA OVERNIGHT COURIER
VIA EMAIL (cableguy01@windstream.net)

James Fields
Fields Cable TV
102 Engle Street
Combs, KY 41739

Re: Notice of Termination
WYMT-TV, CBS, Hazard, Kentucky
WKYT-TV, CBS, Lexington, Kentucky
Retransmission Consent Agreement

Dear Mr. Fields:

By letter dated April 30, 2012, we notified Fields Cable TV (“Operator”) that it was in material breach of the Retransmission Consent Agreement with Gray Television Group, Inc. (“Broadcaster”) dated as of January 1, 2009, as amended January 1, 2012 (the “Agreement”) because Operator had not paid any of the fees required thereunder for any month during the Term of the Agreement. The letter provided Operator with thirty days to cure its default – that is, by May 30, 2012.

Operator did not cure its default within the thirty-day cure period. Indeed, Operator did not respond at all to our letter. Because Broadcaster has not received any payment since January 1, 2009, the Agreement is now terminated as of May 30, 2012.

With the termination of the Agreement, Operator has lost Broadcaster’s consent to retransmit WYMT-TV and WKYT-TV. Any retransmission in the absence of our written consent violates Section 325(b) of Communications Act of 1934, as amended, and the Section 76.64 of the FCC’s rules. In fact, the FCC recently affirmed that retransmission of a broadcast signal in violation of the FCC’s rules could subject a cable operator to fines of up to \$7,500 per station per day. *See Bailey Cable TV, Inc., Notice of Apparent Liability for a Forfeiture*, in MB Docket No. 12-34, DA 12-421, at ¶ 8 (rel. Mar. 16, 2012). Moreover, the lack of retransmission consent would preclude Operator from relying on the cable copyright license (17 U.S.C. § 111) for programming included in the broadcast signals, which could subject Operator to substantial copyright liability.

Even though the Agreement has terminated as of May 30, 2012, Operator remains obligated to pay the monthly retransmission fees for January 1, 2009 through June 1, 2012. We

expect Operator to make prompt payment, including late fees, as set forth in Section 6 of the Agreement. This letter shall not constitute a waiver by Broadcaster of any of its rights and remedies under the Agreement, at law, in equity, or otherwise, each of which is expressly reserved.

If Operator continues to retransmit either WYMT-TV or WKYT-TV on its cable systems, we will be forced to vindicate our rights at the FCC and notify our programming partners – including CBS, NFL and NCAA – of the infringement of their copyrights.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin P. Latek". The signature is written in a cursive, flowing style.

Kevin P. Latek

**Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
)

Fields Cable TV)
)
)

Enforcement Complaint Concerning)
WYMT-TV, Hazard, Kentucky and)
WKYT-TV, Lexington, Kentucky)

DECLARATION OF KEVIN P. LATEK

1. My name is Kevin P. Latek, and I serve as Vice President, Law and Development for Gray Television, Inc., which is the ultimate parent company of the licensee of WKYT-TV and WYMT-TV.
2. I have read the foregoing Enforcement Complaint (the "Complaint"), and I am familiar with the contents thereof.
3. I declare under penalty of perjury that the facts contained herein and within the foregoing Complaint are true and correct to the best of my knowledge, information, and belief formed after reasonable inquiry, that the Complaint is well grounded in fact, that it is warranted by existing law or a good-faith argument for the extension, modification or reversal of existing law, and that it is not interposed for any improper purpose.



Kevin P. Latek
4370 Peachtree Rd. NE
Atlanta, GA 30319

Dated: July 26, 2012

CERTIFICATE OF SERVICE

I certify that on this 26th day of July, 2012, I caused the foregoing Enforcement Complaint to be served by email and first-class mail where indicated on the following:

William T. Lake
Chief, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

P. Michele Ellison
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Michelle Carey
Deputy Chief, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Nancy Murphy
Associate Chief, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mary Beth Murphy
Chief, Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Steven A. Broeckaert
Deputy Chief, Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Diana Sokolow
Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

James Fields
Fields Cable TV*
102 Engle Street
Combs, KY 41739
cableguy01@windstream.net

* also via first-class mail



Rayya Khalaf