

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

In the Matter of)
Comcast Cable Communications, LLC,)
on behalf of its subsidiaries and affiliates)
)
For Determination of Effective Competition in:)
Aberdeen, WA (WA0012))
Elma, WA (WA0103))
Hoquiam, WA (WA0015))
Montesano, WA (WA0106))

CSR No. _____

To: Office of the Secretary
Attn: Chief, Media Bureau

PETITION FOR SPECIAL RELIEF

Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates (“Comcast”), pursuant to Sections 76.7 and 76.907 of the Commission’s rules,¹ requests that the Commission find that Comcast faces “effective competition” in above-referenced Washington franchise areas (the “Franchise Areas”).

The Communications Act of 1934, as amended (the “Act”), and the Commission’s rules provide that cable television rates may be regulated only in the absence of effective competition.² Cable operators are entitled to demonstrate that effective competition exists on a franchise-by-franchise basis.³ When a cable operator demonstrates that effective competition exists within a franchise area, cable rates in the affected area are no longer subject to regulation.⁴

¹ 47 C.F.R. §§ 76.7 and 76.907.

² 47 U.S.C. § 543(a)(2); 47 C.F.R. § 76.905(a).

³ 47 C.F.R. § 76.907.

⁴ See *Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992, Rate Regulation*, 8 FCC Rcd. 5631, 5664-5665 (1993) (“Rate Order”).

Under the “competing provider” test set forth in Section 623(1)(1)(B) of the Act and Section 76.905(b)(2) of the Commission’s rules (the “Competing Provider Test”), a cable system will be deemed subject to effective competition if:

- (i) the franchise area is served by at least two unaffiliated multichannel video programming distributors (“MVPDs”), each of which offers comparable programming to at least 50 percent of the households in the franchise area; and
- (ii) the number of households subscribing to multichannel video programming other than the largest MVPD exceeds 15 percent of the households in the franchise area.⁵

As demonstrated below, the Competing Provider Test is satisfied in each of the Franchise Areas – Aberdeen, Elma, Hoquiam, and Montesano -- because two unaffiliated MVPDs serve over 50 percent of the Franchise Areas’ households with comparable programming and the reported penetration rate for DBS providers exceeds the 15 percent threshold in the Franchise Areas.

I. THE COMPETING PROVIDER TEST IS SATISFIED IN THE FRANCHISE AREAS

The two prongs of the Competing Provider Test are straightforward and objective. Both prongs of this test clearly are satisfied in each of the Franchise Areas.

A. More Than Two Unaffiliated MVPDs Offer Programming Comparable to Comcast to Over 50 Percent of the Households in the Franchise Areas.

The first prong of the Competing Provider Test requires that a franchise area must be served by “at least two unaffiliated multichannel video programming distributors...”⁶ This requirement is easily satisfied, because the two major direct broadcast satellite providers

⁵ 47 U.S.C. § 543(1)(1)(B)(i) and (ii); 47 C.F.R. § 76.905(b)(2)(i) and (ii).

⁶ 47 U.S.C. § 543(1)(1)(B)(i); 47 C.F.R. § 76.905(b)(2)(i). Section 602 of the Communications Act of 1934, as amended, defines “multichannel video programming distributors” to include cable operators, as well as DBS and MMDS providers. *See* 47 U.S.C. § 522(13).

(DirecTV, Inc. and Dish Network, Corp.) (“DBS Providers”) are unaffiliated with Comcast and “offer” programming that is comparable to Comcast to more than 50 percent of the households in Comcast’s Franchise Areas.

Service of an MVPD will be deemed “offered” when it is both technically and actually available.⁷ The Commission has determined that DBS service is presumed to be “technically available” throughout the country due to its nationwide satellite footprint.⁸ Comcast’s Franchise Areas are well within the satellite footprint of DirecTV and Dish Network. Thus, both DirecTV and Dish Network are “technically available” in the Franchise Areas.

DBS service is presumed to be “actually available” if households in a franchise area are made “reasonably aware” that the service is available.⁹ The Commission has stated that “a party may use evidence of penetration rates in the franchise area (the second prong of the competing provider test ...) coupled with the ubiquity of DBS services to show that consumers are

⁷ *Rate Order* ¶ 29.

⁸ *See MediaOne of Georgia, Inc; Petition for Revocation of the Certification of Gwinnett County, Georgia*, 12 FCC Rcd. 19406, ¶ 5 n.16 (1997) (citing *Rate Order*, at 5660-5661).

⁹ *See Rate Order* ¶ 32 (citations omitted). *See also Charter Communications, LLC d/b/a Charter Communications Petition for Determination of Effective Competition in Fourteen North Carolina Communities, et al*, 19 FCC Rcd. 7003, ¶ 4 (2004).

reasonably aware of the availability of DBS service.”¹⁰ The same reasoning applies here.

DirecTV and Dish Network are among the largest MVPDs in the nation.¹¹ With approximately 33.8 million subscribers nationwide,¹² comprising over 33 percent of all MVPD subscribers,¹³ ubiquitous advertising, and the substantial DBS penetration figures in the Franchise Areas, it is clear that consumers in the Franchise Areas are “reasonably” aware of the availability of DBS competitors.¹⁴ Accordingly, both DirecTV and Dish Network are presumed to be “actually

¹⁰ *Comcast Cable Communications, LLC Petition for Determination of Effective Competition in Various Michigan Communities*, 23 FCC Rcd. 9595, ¶ 5 (2008), citing *Mediacom Illinois LLC et al., Eleven Petitions for Determination of Effective Competition in Twenty-Two Local Franchise Areas in Illinois and Michigan*, 21 FCC Rcd. 1175 (2006) (“*Comcast – Various Michigan Communities*”). Thus, the Commission has not required the production of advertising to demonstrate that households in the franchise area are “reasonably aware” of the availability of DBS service. See *Bright House Networks, LLC Petition for Determination of Effective Competition (Lake Alfred and Dundee FL)*, 22 FCC Rcd. 4390, ¶ 6 (2007) (“Over more than ten years, we have made hundreds of findings that households in particular franchise areas are reasonably aware that they may purchase DBS services based on localized evidence. These accumulated showings amount to substantial evidence that households in all franchise areas are reasonably aware that they may purchase DBS services. In at least one earlier reported decision, we found households in a franchise area to be reasonably aware that they may purchase DBS service solely based on evidence of DBS's nationwide growth and local subscriptions, without reference to advertising or other promotion.”) (“*Bright House Networks – Florida*”).

¹¹ See *Thirteenth Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming*, MB Docket No. 06-189, FCC 07-206, ¶ 76 (rel. Jan. 16, 2009).

¹² See Press Release, DirecTV Inc., *DirecTV Announces Fourth Quarter and Full Year 2011 Results* (Feb. 16, 2012) (reporting that, as of December 31, 2011, DirecTV (US) had 19.9 million subscribers), available at <http://investor.directv.com/releasedetail.cfm?ReleaseID=649162>; See Press Release, Dish Network, *Dish Network Reports Fourth Quarter and Year End 2011 Financial Results* (Feb. 23, 2012) (reporting that, as of December 31, 2011, Dish Network had approximately 13.97 million subscribers), available at <http://press.dishnetwork.com/press-releases/dish-network-reports-fourth-quarter-and-year-end-2-nasdaq-dish-0855001>.

¹³ Georg Szalai, *Pay TV Operators Added 300,000 Subscribers in Fourth Quarter*, *The Hollywood Reporter*, March 19, 2012 (citing SNL Kagan report of 100.31 million video subscribers by the end of 2011), available at <http://www.hollywoodreporter.com/news/pay-tv-operators-added-subscribers-fourth-quarter-snl-kagan-showtime-starz-hbo-301624>.

¹⁴ See, e.g., *Comcast – Various Michigan Communities* ¶ 5; *Bright House Networks – Florida* ¶ 6.

available” in the Franchise Areas, and are offered to over 50 percent of the households in the Franchise Areas.

The Competing Provider Test also requires that the programming offered by the competing provider must be “comparable” to the programming offered by the cable operator.¹⁵ The Commission’s rules define comparable programming as “at least 12 channels of video programming, including at least one channel of nonbroadcast service programming.”¹⁶ The Commission has repeatedly recognized that the DBS Providers offer comparable programming under the Commission’s Competing Provider Test.¹⁷ Each of the DBS Providers offer well over 100 video channels, most of which are non-broadcast services.¹⁸ And, as shown in the attached channel line-up, Comcast’s programming service offerings in the Franchise Areas are substantially similar to the DBS Providers’ programming services.¹⁹

Based on the above facts, Comcast has satisfied the first prong of the Competing Provider Test.

B. The Competing Providers Serve Greater Than 15 Percent of the Households In Comcast’s Franchise Areas.

The second prong of the Competing Provider Test requires that the subscriber base of competing MVPDs, other than the largest MVPD, exceeds 15 percent of franchise area households.

¹⁵ See 47 U.S.C. § 543(1)(1)(B)(i); 47 C.F.R. § 76.905(b)(2)(i).

¹⁶ 47 C.F.R. § 76.905(g).

¹⁷ See, e.g., *Comcast Cablevision of Maryland, Inc., Petitions for Determination of Effective Competition (Charles County, MD)*, 19 FCC Rcd. 7130, ¶ 4 (2004) (“We find that the programming of DBS providers satisfies the Commission’s program comparability criterion because DBS providers offer more than 12 channels of video programming, including more than one non-broadcast channel.”).

¹⁸ See Channel Line-ups of DirecTV and Dish Network, attached hereto as Exhibit 1.

¹⁹ See Comcast Channel Line-up, attached hereto as Exhibit 2.

DBS Providers track their subscribers according to the zip codes where each subscriber resides, rather than by political jurisdiction. In this case, Comcast relied on ZIP+4 codes associated with each Franchise Area in order to determine the number of DBS subscribers within the Franchise Area. The Commission has previously accepted ZIP+4 codes as “reasonable and sufficiently reliable for purposes of determining the presence of effective competition,”²⁰ and stated its preference for this approach.²¹

To determine the relevant ZIP+4 codes for the Franchise Areas, Comcast contacted Media Business Corp. (“MBC,” previously known as “SkyTrends”). MBC has developed a process to accurately identify the ZIP+4 codes that correspond with the political boundaries of a particular community. This process utilizes enhanced mapping software that correlates ZIP+4 codes with the U.S. Census Department’s “block group” level households. The “block group” measurement is the most precise Census tool available to measure households within a very small geographical area. With this software, MBC was able to identify the ZIP+4 codes that lie within the Franchise Areas.²²

Comcast next provided all of the ZIP+4 codes for the Franchise Areas to the Satellite Broadcasting and Communication Association (“SBCA”). SBCA is the national trade association representing the two major DBS Providers, and it has assumed the responsibility for

²⁰ See *Cable One, Inc. Petition for Determination of Effective Competition in Pocatello, Idaho*, 18 FCC Rcd. 12792, ¶ 8 (2003), quoting *Falcon Cable Systems II, a California Limited Partnership, d/b/a Charter Communications Petition for Determination of Effective Competition in Twelve Oregon Cities*, 17 FCC Rcd. 4648 (2002).

²¹ See Public Notice, “Commission Announces New Standards for Showings of Effective Competition For Cable Service,” 23 FCC Rcd. 12067 (2008). The Commission stopped short of requiring ZIP+4 evidence in effective competition cases. See Public Notice, “Commission Clarifies Standards for Evidence of Competing Provider Effective Competition for Cable Service,” DA 09-1361, 24 FCC Rcd. 8198 (2009).

²² See Letter from MBC (explaining ZIP+4 methodology), attached hereto as Exhibit 3.

compiling subscribership data and responding to data requests from cable operators and franchising authorities engaged in effective competition proceedings. The DBS subscriber numbers reported in the attached Effective Competition Tracking Reports (“ECTR”) from SBCA reflect the total DBS subscribers within the individual ZIP+4 codes associated with the Franchise Areas.²³

Finally, Comcast compared the DBS subscribership figures reported by SBCA on a ZIP+4 basis with its own subscribership, and was able to confirm that its own subscribership exceeded DBS subscribership in each of the four communities that qualify for effective competition under the Competing Provider Test – Aberdeen, Elma, Hoquiam, and Montesano. Comcast is the largest MVPD in these Franchise Areas.

To determine whether DBS subscribership exceeds the statutorily mandated 15 percent threshold in the Franchise Areas, Comcast compared the competing providers’ subscribership to the most recent U.S. Census occupied household unit figures for the communities.²⁴ This comparison yields the penetration rate for DBS Providers in the Franchise Areas.

As detailed in Exhibit 6, the subscriber rate for the DBS Providers in the Franchise Areas exceeds the 15 percent threshold required under Section 623(1)(1)(B) of the Act. Accordingly, Comcast meets the second prong of the Competing Provider Test.

Because Comcast meets both prongs of the Competing Provider Test in the Aberdeen, Elma, Hoquiam, and Montesano Franchise Areas, it faces effective competition in these Franchise Areas.

²³ See Exhibit 4 (providing total ZIP+4-based DBS subscribership for the Franchise Areas, as well as all ZIP+4 data relied on in the Petition).

²⁴ 2010 Census Data household data figures are available at <http://factfinder2.census.gov>, the relevant pages of which are attached hereto as Exhibit 5.

CONCLUSION

Comcast's cable system is subject to effective competition in each of the Franchise Areas under the Competing Provider Test. Based on the evidence presented herein, Comcast respectfully requests that the Media Bureau issue an order acknowledging the presence of effective competition in each of the four Washington Franchise Areas as of the filing date of this Petition.

Respectfully submitted,

**Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates**

By: 
Frederick W. Giroux

Davis Wright Tremaine, LLP
1919 Pennsylvania Avenue, N.W., Suite 800
Washington, D.C. 20006
(202) 973-4200

August 29, 2012

Its Attorneys

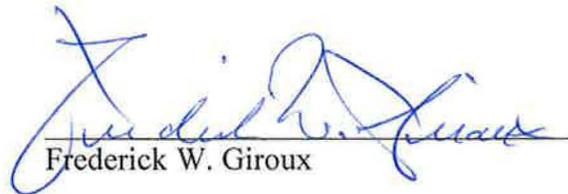
CERTIFICATION PURSUANT TO 47 C.F.R. § 76.6(a)(4)

The below-signed signatory has read the foregoing Petition for Special Relief, and to the best of my knowledge, information and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; and is not interposed for any improper purpose.

Respectfully submitted,

**Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates**

By:


Frederick W. Giroux

Davis Wright Tremain LLP
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, DC 20006
(202) 973-4200

August 29, 2012

Its Attorney

DECLARATION OF WARREN FITTING

I, Warren Fitting, declare, under penalty of perjury that:

1. I am the Senior Director of Regulatory Accounting for Comcast Cable Communications, LLC ("Comcast").
2. I have read the foregoing Petition for Special Relief ("Petition") and am familiar with the contents thereof and the matters referred to therein.
3. I have reviewed Comcast's respective cable subscriber numbers for the Franchise Areas at issue in this Petition, as well as the DBS subscriber numbers provided by SBCA for the individual Franchise Areas as described in the Petition. Of the Franchise Areas subject to the Competing Provider Test, Comcast is the largest multichannel video program provider in the Aberdeen, Elma, Hoquiam, and Montesano Franchise Areas.
4. The facts contained within the Petition are true and correct to the best of my knowledge, information and belief.

August 20, 2012
Date

Warren D. Fitting
Warren Fitting

EXHIBIT 1



PREMIER package

285+ digital channels

Print channels for ZIP Code 17303 (No locals available)

PRINT

EN ESPAÑOL

ONCE México*	447	Y-me*	440	mun2	410
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NATIONALS

3net (HD)	HD 107	Disney Channel (West)	291	Hope*	368	RFD TV	345
A&E	HD 265	Disney XD	HD 292	INSP	364	ReelzChannel	238
ABC Family	HD 311	Documentary Channel	267	ION Television	305	SOAPnet	262
American Movie Classics (AMC)	HD 254	E! Entertainment	236	ION Television West	347	Science Channel	HD 284
Animal Planet	HD 282	ESPN	HD 206	Independent Film Channel (IFC)	559	ShopNBC	316
Audience Network	HD 239	ESPN 3D (HD)	HD 106	Investigation Discovery (ID)	285	Speed Channel	HD 607
BBC America	264	ESPN2	HD 209	Jewelry Television	313	Spike	HD 241
BYU TV	374	ESPNEWS	HD 207	Jewish Life Television*	366	Style	235
Big Ten Network	HD 610	ESPNU	HD 208	Lifetime	HD 252	Syfy Channel	HD 244
Biography Channel	HD 266	EWTN	370	Lifetime Movie Network	253	TBS	HD 247
Black Entertainment Television (BET)	HD 329	Enlace Christian Television*	448	LinkTV	375	TCT Network	377
Bloomberg Television	353	FUEL TV	HD 618	Logo	272	TNT	HD 245
Boomerang	298	FX	HD 248	MHz WORLDVIEW*	2183	TV Guide Network	273
Bravo	HD 237	Food Network	HD 231	MLB Network	HD 213	TV Land	304
CBS Sports Network	HD 613	Fox Business Network	HD 359	MSNBC	HD 356	TV One	328
CCTV-9	2053	Fox Movie Channel	258	MTV	HD 331	TeenNick	303
CMT	HD 327	Fox News Channel	HD 360	MTV2	333	Tennis Channel	HD 217
CNBC	HD 355	Free Speech TV*	348	Military Channel	287	The Hub	294
CNBC World	357	Fuse	339	NASA TV	289	The Learning Channel	HD 280
CNN	HD 202	GEM NET (Global Expansion Media Network)*	2068	NBA TV	HD 216	The Sportsman Channel	605
CSPAN 1	350	GOD TV	365	NFL Network	HD 212	The Word Network	373
CSPAN 2	351	GSN, the network for games	233	NHL Network	HD 215	Travel Channel	HD 277
Cartoon Network (East)	HD 296	Galavision	404	NRB	378	Trinity Broadcasting Network (TBN)	372
Cartoon Network (West)	297	Go!TV HD English	HD 620	Nat Geo WILD	283	TruTV	246
Centric	330	Golden Eagle Broadcasting*	363	National Geographic Channel	HD 276	Turner Classic Movies (TCM)	256
Chiller	257	Golf Channel	HD 218	Nick Jr.	301	USA Network	HD 242
Christian Television Network (CTN)	376	Gospel Music Channel	338	Nickelodeon (East)	HD 299	Univision	402
Church Channel	371	Great American Country	326	Nickelodeon (West)	300	VH1	HD 335
Cloo	308	HZ	271	Nicktoons Network	302	VH1 Classic	337
Comedy Central	HD 249	HD Theater	HD 281	OWN	279	Versus	HD 603
Cooking Channel	232	HDNet	HD 306	Ovation TV	274	WE: Women's Entertainment	260
Current TV	358	HITN*	438	Oxygen	251	WGN America	HD 307
DIY Network	230	Hallmark Channel	HD 312	PBS	0	Weather Channel	HD 362
Daystar	369	Headline News	204	PBS Kids Sprout	295	World Harvest Television	367
Discovery Channel	HD 278	History Channel	HD 269	Planet Green	HD 286	n3D	HD 103
Discovery Fit & Health	261	Home & Garden Television (HGTV)	HD 229	Pursuit Channel	608		
Disney Channel (East)	HD 290	Home Shopping Network	240	QVC	275		

PREMIUMS

5STARMAX HD East	HD 520	FLIX ON DEMAND®	1557	MoreMAX	HD 517	STARZ® ON DEMAND	1527
@MAX HD East	HD 523	FOX Deportes	624	Outdoor Channel	606	Showtime Beyond HD	HD 550
ActionMAX HD	HD 519	Flix	557	SHOWTIME	HD 545	Showtime Next HD	HD 551
Cinemax East	HD 515	Fox Soccer Channel	HD 619	SHOWTIME (West)	HD 546	Showtime Women HD	HD 552
Cinemax West	HD 516	Go!TV	620	SHOWTIME 2	HD 547	Sundance Channel	558
ENCORE (East)	HD 535	HBO (East)	HD 501	SHOWTIME Extreme	HD 549	Sundance ON DEMAND	1558
ENCORE (West)	536	HBO (West)	HD 504	SHOWTIME ON DEMAND	1545	THE MOVIE CHANNEL™ ON DEMAND	1554
ENCORE Action	541	HBO 2 (East)	HD 502	SHOWTIME Showcase	HD 548	TMC Xtra HD East	HD 556
ENCORE Drama	540	HBO 2 (West)	505	STARZ (East)	HD 527	TVG - The Interactive Horseracing Network	602
ENCORE Family	542	HBO Comedy HD	HD 506	STARZ (West)	HD 528	The Movie Channel (East)	HD 554

PREMIUMS							
ENCORE Love	537	HBO Family (East)	HD 507	STARZ Cinema HD	HD 531	The Movie Channel (West)	555
ENCORE Suspense	539	HBO Family (West)	508	STARZ Comedy HD	HD 526	ThrillerMAX HD	HD 522
ENCORE Westerns	538	HBO Latino	HD 511	STARZ Edge	HD 529	WMAX HD East	HD 521
ENCORE ON DEMAND	1535	HBO Signature	HD 503	STARZ InBlack	HD 530		
ESPN Classic Sports	614	HBO Zone HD	HD 509	STARZ Kids & Family HD	HD 525		
REGIONAL SPORT NETWORKS							
Altitude Sports & Ent. 681	HD 681	FS Arizona	HD 686	FS South Plus (Z)	HD 648	ROOT SPORTS Rocky Mountain	HD 683
Altitude Sports Alternate 682	HD 682	FS Cincinnati	HD 661	FS Southwest	HD 676	SportSouth	HD 649
CSN Bay Area	HD 696	FS Detroit	663	FS Southwest Plus	HD 677	SportSouth Plus	HD 650
CSN Bay Area Alternate 697	HD 697	FS Detroit Plus	HD 664	FS West	HD 692	SportsNet New York 639	HD 639
CSN California	HD 698	FS Florida	HD 654	MASN 640	HD 640	SportsTime Ohio 662	HD 662
CSN California alt 699	699	FS Florida Plus	HD 655	MSG Plus 635	HD 635	Sun Sports	HD 653
CSN Chicago Alt. #2	667	FS Midwest	HD 671	Madison Square Garden 634	HD 634	Sun Sports Plus	HD 656
CSN MidAtlantic Alt.	HD 643	FS North	HD 668	NESN 628	HD 628	Yankee Ent. & Sports (YES) 631	HD 631
CSN MidAtlantic 642	HD 642	FS Ohio	HD 660	Prime Ticket	HD 694		
CSN New England 630	HD 630	FS South	HD 646	ROOT SPORTS Northwest	HD 687		
Comcast SportsNet Chicago 665	HD 665	FS South Plus	HD 647	ROOT SPORTS Pittsburgh	HD 659		
SATELLITE RADIO							
SONICTAP: 60's Revolution	803	SONICTAP: College Rock	831	SONICTAP: Italian Bistro Blend	881	SONICTAP: Regional Mexican	873
SONICTAP: 70's Hits	804	SONICTAP: Dance	859	SONICTAP: Italian Contemporary	882	SONICTAP: Retro Disco	845
SONICTAP: 8-Tracks	840	SONICTAP: Familiar Favorites	880	SONICTAP: Jazz	852	SONICTAP: Rock en Espanol	878
SONICTAP: 80's Hits	805	SONICTAP: Fiesta Tropical	870	SONICTAP: Latin Hits	871	SONICTAP: Salsa	874
SONICTAP: 90's Hits	806	SONICTAP: Flashback/New Wave	839	SONICTAP: Latin Jazz	879	SONICTAP: Showtunes	823
SONICTAP: Adult Alternative	832	SONICTAP: Folk Rock	813	SONICTAP: Light Classical	866	SONICTAP: Silky Soul	843
SONICTAP: Adult Contemporary	821	SONICTAP: Full Metal Jacket	830	SONICTAP: Love Songs	819	SONICTAP: Silver Screen	822
SONICTAP: Alternative	834	SONICTAP: Gospel Glory	827	SONICTAP: Malt Shop Oldies	802	SONICTAP: Singer-Songwriters	836
SONICTAP: Bailamos!	869	SONICTAP: Great Standards	855	SONICTAP: Mariachi	876	SONICTAP: Smooth Jazz	851
SONICTAP: Be-Tween	867	SONICTAP: Groove Lounge	824	SONICTAP: Metro Blend	853	SONICTAP: Soft Hits	849
SONICTAP: Beautiful Instrumentals	820	SONICTAP: Hair Guitar	829	SONICTAP: Modern Country	814	SONICTAP: Spike	841
SONICTAP: Big Band/Swing	801	SONICTAP: Hallelujah	828	SONICTAP: Modern Workout	860	SONICTAP: SubTerranean	858
SONICTAP: Bluegrass	812	SONICTAP: Hit Country	809	SONICTAP: Musica De Las Americas	872	SONICTAP: Symphonic	864
SONICTAP: Blues	854	SONICTAP: Holidays & Happenings	815	SONICTAP: New Age	856	SONICTAP: The Boombbox	846
SONICTAP: Carnaval Brasileiro	877	SONICTAP: Honky Tonk Tavern	811	SONICTAP: Old School Funk	844	SONICTAP: The Playground	868
SONICTAP: Classic Hits Blend	837	SONICTAP: Hot Jamz	825	SONICTAP: PUMP!	861	SONICTAP: The Spirit	826
SONICTAP: Classic Jazz Vocal Blend	850	SONICTAP: Hottest Hits	818	SONICTAP: Piano	865	SONICTAP: Today's Hits	816
SONICTAP: Classic R&B	842	SONICTAP: Hurbano	875	SONICTAP: Rat Pack	807	SONICTAP: Traditional Country	808
SONICTAP: Classic Rock	833	SONICTAP: Hype	847	SONICTAP: Reality Bites	838	SONICTAP: Tranquility	884
SONICTAP: Classic Rock Workout	862	SONICTAP: Ink'd	835	SONICTAP: Red, Rock and Blues	810	SONICTAP: Y2k Hits	817
SONICTAP: Coffeehouse Rock	848	SONICTAP: Irish	883	SONICTAP: Reggae	863	SONICTAP: Zen	857
LOCALS							
WGAL (NBC)	HD 8	WHTM (ABC)	HD 27	WLYH (CW)	15	WPMT (FOX)	HD 43
WHP (CBS)	HD 21	WITF (PBS)	HD 33				

*The following channels require a special dish or equipment: MHz, GEM NET, Hope Channel, JLTV, Once, HITN, V-Me, Eniace, Golden Eagle Broadcasting, and Free Speech TV. Please call 1-800-531-5000 for more information.

THERE'S SOMETHING FOR EVERYONE

America's Top 120

A&E	A&E	HD	118
ABCFM	ABC Family	HD	180
ALIVE	America Live		219
ANGEL	Angel One		282
ANGL2	Angel Two		268
AXS	AXS TV	HD ONLY	131
BTW	Business Television		9602
BUY!	Buy!		221
TOON	Cartoon Network (E) ^{SAP}	HD	178
TOONW	Cartoon Network (W)		177
CCTVE	CCTV-E		884
CCNEWS	CCTV-News		285
CHRRCH	Church Channel		258
CMT	CMT	HD	188
CNBC	CNBC	HD	208
CNN	CNN	HD	200
CMFY	Comedy Central	HD	107
CSPN2	C-SPAN2		211
DYSTR	Daystar		263
DISC	Discovery Channel	HD	182
DISE	Disney Channel (E) ^{SAP}		172
DISW	Disney Channel (W)		173
DOC	Documentary Channel		197
E!	E! Entertainment Television	HD	114
ESPN	ESPN	HD	140
ESPN2	ESPN2	HD	144
ESNWS	ESPNNEWS		142
ESPNU	ESPNU		141
FOOD	Food Network	HD	110
FXNWS	FOX News Channel	HD	205
FX	FX ^{SAP}	HD	136
GEMS	Gems & Jewelry TV		229
HGTV	HGTV	HD	112
HIST	History	HD	120
HNN	HLN	HD	202
HRTV	HorseRacing TV		404
HSN	HSN		84
HSN2	HSN2		226
ICTV	In Country Television		230
INSP	Inspiration Network		259
ION	ION (E)		218
IONW	ION (W)		217
JTV	Jewelry Television		227
LIFE	Lifetime	HD	108
MALL	Mall		220
MTV	MTV	HD	160
MTV2	MTV2		161
NICK	Nick/Nick at Nite (E) ^{SAP}	HD	170
NICKW	Nick/Nick at Nite (W)		171
PRAYR	Prayer		256
QVC	QVC		137
REELZ	ReelzChannel	HD	289
SALE	Sale		225
SHOP	shop		224
SHNBC	ShopNBC		228
SBN	SonLife Broadcasting Network		257
SPIKE	Spike TV	HD	168
SYFY	Syfy	HD	122
TBS	TBS ^{SAP}	HD	139
TLC	TLC	HD	183
TNT	TNT ^{SAP}	HD	138
TRV	Travel Channel	HD	188
TVGAM	TV Game Network		405
TVGN	TV Guide Network		117
TVLND	TV Land		106
USA	USA ^{SAP}	HD	105
VH1	VH1		162
TWC	Weather Channel	HD	214

SituaXM Music Channels	
Hopper	98
All other receivers	6002-6098
DishCD Music Channels	
Hopper	98
All other receivers	950-981

America's Top 200

includes all of America's Top 120 and the channels listed below.

APL	Animal Planet	HD	184
BBCA	BBC America	HD	135
BET	BET	HD	124
BIG10	Big Ten Network ¹	HD	439
BRAVO	Bravo	HD	128
CBSSN	CBS Sports Network		158
CURNT	Current TV		215
DISXD	Disney XD ^{SAP}		174
FOX8	Fox Business Network	HD	206
G4	G4	HD	191
GLVSN	Galavisión	HD	273
GOLF	Go! Channel	HD	401
GSN	GSN	HD	118
HLMRK	Hallmark Channel	HD	185
HUB	Hub	HD	179
ID	Investigation Discovery	HD	192
LMN	Lifetime Movie Network	HD	109
MLBN	MLB Network	HD	152
MSNBC	msnbc	HD	209
MTGEO	National Geographic Channel	HD	186
NBTV	NBA TV	HD	156
NFL	NFL Network	HD	154
NHLN	NHL Network	HD	157
NKJR	Nick Jr.		169
NUVO	nuvoTV		167
OVATN	Ovation		281
OWN	OWN: Oprah Winfrey Network	HD	189
OXYGN	Oxygen		127
RFDV	RFD-TV	HD	231
SCI	Science	HD	193
SOAP	SOAPnet		253
SPEED	SPEED	HD	160
STYLE	Style	HD	115
TEEN	TeenNick		181
TRAE	TeleFutura (E) ¹		271
FTRAW	TeleFutura (W) ¹	HD	272
TRUTV	truTV	HD	204
TCM	Turner Classic Movies	HD	132
UNVSN	Univision (E)	HD	270
UNVSW	Univision (W)		828
UDEP	Univision Deportes Network		869

General Channels¹			
BABY1	BabyFirstTV		8400
BLOCK	Blockbuster Studio Channel		102
BYUTV	BYUTV		9403
CTN	Christian Television Network		267
ARTS	Classic Arts Showcase		8406
CSPAN	C-SPAN		210
DN101	DISH 101		101
EARTH	DISH Earth		287
HOME	DishHOME (not available on Hopper)		100
ENLC	Enlace		9411
EWTN	Eternal Word Television ^{SAP}		281
PREVW	Free Preview Guide		103

Local Networks 2-70			
abc	CBS	3	FOX
Regional Sports Networks ¹			
Hopper			412
All other receivers			408-437

¹ Channels are broadcast in SD and HD unless noted as **HD ONLY**. To view channels broadcast in HD, you need an HD TV, a DISH HD receiver, and a DISH HD add-on package.

BOLD - Channels in bold are some of our most popular channels. ^{SAP} - Spanish audio feed available. Audio disponible en español. Available on select HD channels.

America's Top 250

includes all of America's Top 200 and the channels listed below.

BIO	Blo	HD	119
BITV	Bloomberg Television	HD	203
BOOM	Boomerang ^{SAP}		175
CHILR	Chiller		190
CLOO	cloo		198
COOK	Cooking Channel	HD	113
AMERI	Destination America	HD	194
DIY	DIY	HD	111
ENCOR	Encore (E)	HD ONLY	340
ENCRW	Encore (W) ^{SAP}		341
EACTN	Encore Action		343
EDRAM	Encore Drama		345
ENFAM	Encore Family		347
ENLOVE	Encore Love		348
ESUSP	Encore Suspense		344
EWSTN	Encore Westerns		342
EPXDR	EPIX DRIVE-IN ^{SAP}		292
FOXMO	Fox Movie Channel		133
FSC	Fox Soccer Channel	HD	406
FUEL	FUEL TV		398
GMC	gmc		188
GAC	Great American Country (GAC)		165
H2	H2	HD	121
HMC	Hallmark Movie Channel	HD	187
MIL	Military Channel		195
MPLEX	MoviePlex		377
MUN2	mun2		838
NATGW	Nat Geo WILD	HD	190
NBCSP	NBC Sports Network	HD	159
NICKT	Nicktoons Network		178
OTDCH	Outdoor Channel		395
RURAL	Rural TV		232
SPMAN	Sportsman Channel	HD	395
TENIS	Tennis Channel	HD	400
TMC-W	The Movie Channel (W) ^{SAP}		329
VERIA	Veria	HD	218
VH1CL	VH1 Classic		163
DISH Music Channels			
Hopper			98
All other receivers			923-948

FSTV	Free Speech TV		8415
KBS	KBS World ¹		9394
KTV	Kids & Teens Television (KTV)		284
LINK	Link TV		9410
NASA	NASA		212
ONPPV	Pay-Per-View Guide		500
PNTGN	Pentagon		9405
TBN	TBN		260
IMPCT	The Impact Network		9397
3ABN	Three Angels Broadcasting Network		9393
VME	V-ME		9414

Pay-Per-View			
MOVIE	DISH Cinema		1
MOVIE	DISH Cinema		500-558
SPORT	Sports & Events		454-472

¹ Channel availability based on one or more of the following: geographical location, time zone, programming package, dish antenna.

² Available with Multi-Sport Pack or a minimum of America's Top 120 Plus package.

Smart Pack

ALIVE	America Live		219
ANGEL	Angel One		282
ANGL2	Angel Two		268
APL	Animal Planet		184
BIO	Blo		119
BITV	Bloomberg Television		203
BOOM	Boomerang ^{SAP}		175
BUY!	Buy!		221
CBSSN	CBS Sports Network		158
CCTVE	CCTV-E		884
CCNEW	CCTV-News		265
COOK	Cooking Channel		113
CSPN2	C-SPAN2		211
DYSTR	Daystar		263
DIY	DIY		111
DOC	Documentary Channel		197
FOOD	Food Network		110
FXNWS	FOX News Channel		205
GEMS	Gems and Jewelry		229
GAC	Great American Country (GAC)		165
HLMRK	Hallmark Channel		185
HMC	Hallmark Movie Channel		187
HLN	HLN		202
HSN	HSN		84
HSN2	HSN2		226
HUB	Hub		179
ICTV	In Country Television		230
JTV	Jewelry Television		227
MALL	Mall		220
NICK	Nick/Nick at Nite (E)		170
NICKW	Nick/Nick at Nite (W)		171
NICKT	Nicktoons Network		178
OTDCH	Outdoor Channel		395
QVC	QVC		137
RFDTV	RFD-TV		231
SALE	Sale		225
SCI	Science		193
SHOP	shop		224
SHNBC	ShopNBC		228
TVLND	TV Land		106
TWC	Weather Channel		214



For the most up-to-date Channel Lineup Card, please visit mydish.com/channelcard.



CHANNELS AND PACKAGES

Premium Movie Packages

HBO			
HBO-E	HBO (E) SAP	HD	300
HBO2E	HBO2 (E) SAP	HD	301
HBO5G	HBO Signature SAP	HD	302
HBO-W	HBO (W) SAP	HD	303
HBO2W	HBO2 (W) SAP		304
HBOFM	HBO Family SAP	HD	305
HBOCY	HBO Comedy SAP	HD	307
HBOZ	HBO Zone	HD ONLY	308
HBO LT	HBO Latino	HD	309

KINEMAX

MAX-E	Cinemax (E) SAP	HD	310
MAX-W	Cinemax (W) SAP	HD	311
MOMAX	MoreMAX SAP		312
ACMAX	ActionMAX SAP	HD	313
5-MAX	5StarMAX SAP	HD	314

SHOWTIME

SHO-E	Showtime (E) SAP	HD	318
SHO-W	Showtime (W) SAP	HD	319
SHOTO	Showtime 2 SAP	HD	320
SHOCS	Showtime ShowCase SAP	HD	321
SHOEX	Showtime Extreme SAP		322
SBYND	Showtime Beyond SAP		323
TMC-E	The Movie Channel (E) SAP	HD	327
TMCXE	The Movie Channel Extra (E) SAP		328
FLX	FLIX		333

STARZ

ENCOR	Encore (E) SAP	HD	340
STARZ	Starz (E) SAP	HD	350
STRZW	Starz (W) SAP	HD	351
SEdge	Starz Edge SAP	HD	352
SCINE	Starz Cinema SAP		353
STZC	Starz Comedy	HD	354
SBLCK	Starz InBlack SAP		355
SK&FM	Starz Kids & Family SAP	HD	356

Mini-Packs

EPIX			
EPIX1	EPIX 1 SAP	HD	380
EPIX2	EPIX 2 SAP	HD	381
EPIX3	EPIX 3 SAP	HD ONLY	382
EPXDR	EPIX DRIVE-IN SAP		292

Encore Movie Pak

ENCRW	Encore (W) SAP		341
EACTN	Encore Action		343
EDRAM	Encore Drama		345
ENFAM	Encore Family		347
ELOVE	Encore Love		346
ESUSP	Encore Suspense		344
EWSTN	Encore Westerns		342
MPLX	MoviePlex		377

Mini-Packs

Blockbuster @Home
100,000 movies, shows and games by mail, thousands of titles streamed to your TV with an HD DVR connected to broadband Internet, 25,000 titles available on dishonline.com.

CTRC	Centric	HD ONLY	371
CI	Crime & Investigation	HD ONLY	368
ESUSP	Encore Suspense		344
EPIX1	EPIX SAP	HD	380
EPIX2	EPIX2 SAP	HD	381
EPIX3	EPIX3 SAP	HD ONLY	382
HMC	Hallmark Movie Channel	HD	187
HDNMV	HDNet Movies	HD ONLY	383
INDIE	IndiePlex	HD ONLY	378
LOGO	LOGO	HD ONLY	373
MAVTV	MAVTV American Real		361
MGM	MGM	HD ONLY	385
MPLX	MoviePlex		377
PLDIA	Palladia	HD ONLY	389
PIXL	PixL	HD	388
RETRO	RetroPlex	HD ONLY	379
SMC	Sony Movie Channel	HD ONLY	386
SCINE	Starz Cinema		353
UNIHD	Universal HD	HD ONLY	366
VLCTY	Velocity	HD ONLY	364
WFN	World Fishing Network		394

Heartland

BABY	Baby TV SAP		824
GMC	gmc		188
GSN	GSN	HD	116
HLMRK	Hallmark Channel	HD	185
HMC	Hallmark Movie Channel	HD	187
HUB	Hub	HD	179
OWN	OWN: Oprah Winfrey Network	HD	189
PIXL	PixL SAP	HD	388
RFDTV	RFD-TV	HD	231
RURAL	Rural TV		232

Outdoor Sports

MAVTV	MAVTV American Real HD	HD ONLY	361
OTDCH	Outdoor Channel		396
SPMAN	Sportsman Channel	HD	395
WFN	World Fishing Network		394

Multi-Sport

ESPCL	ESPN Classic		143
FSC	Fox Soccer Channel	HD	406
FUEL	FUEL TV		398
MLBN	MLB Network	HD	152
MLBSZ	MLB Network Strike Zone		153
NFL	NFL Network	HD	154
NFLRZ	NFL RedZone	HD	155
NBATV	NBA TV	HD	156
NHLN	NHL Network	HD	157
USN	Universal Sports		402

Plus over 25 Regional Sports Networks

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Visit mydish.com/getconnected

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There are a lot of benefits to being a DISH customer. You get things like month-long free previews, sweepstakes for trips, HDTVs and more, exclusive free shows, new channels, and tons of online content. And it's all included with your DISH service.

Get all the extras for nothing extra.
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Need some help?

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twitter.com/dish

[DISH 101 - Support Channel \(Ch. 101\)](https://dish.com)



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EXHIBIT 2

XFINITY® CHANNEL LINE-UP (continued)

Digital Preferred Plus

Includes Limited Basic, Digital Starter, Digital Preferred, HBO and Starz

Digital Premier

Includes Limited Basic, Digital Starter, Digital Preferred, Digital Preferred Plus, Sports Entertainment Package, Cinemax and Showtime

Sports Entertainment Package

401 Fox Soccer Channel
402 ESPNNews
403 ESPN Classic
404 Big Ten Network
406 Outdoor Channel
407 MLB Network
408 Speed
409 TVG
410 NFL Red Zone
411 Tennis Channel
412 CBS Sports Network
413 Fox College Sports - ATL
414 Fox College Sports - CEN
415 Fox College Sports - PAC
416 NBA TV
417 NFL Network
418 NFL Network HD
419 NHL Network
506 Fox Movie Channel
618 Fox Soccer Channel HD
622 ESPNNews HD
629 MLB Network HD
630 NBA TV HD
631 NHL Network HD
632 Big Ten Network HD
633 CBS Sports Network HD
634 Tennis Channel HD
635 Outdoor Channel HD
637 NFL Red Zone HD

Premium Services

Starz
532 Starz HD
534 Starz
536 Starz Edge
537 Starz in Black
538 Starz Cinema
539 Starz Kids & Family
540 Starz Comedy
HBO
543 HBO 2 HD
544 HBO Signature HD
546 HBO Latino HD
549 HBO HD
550 HBO East
551 HBO West
553 HBO 2
555 HBO Signature
557 HBO Family
558 HBO Latino
559 HBO Comedy
560 HBO Zone West

Cinemax

561 Cinemax West
562 Cinemax East

563 Cinemax HD

565 More Max

Showtime

574 Showtime HD
576 Showtime
578 Showtime Too
580 Showtime Showcase
582 Showtime Extreme
586 Flix

The Movie Channel

588 TMC HD

591 TMC
593 TMC Xtra

Adult

853 Playboy

International Selections

241 TFC (Filipino)
242 GMA Pinoy TV (Filipino)
243 GMA Life
245 TV Japan (Japanese)
246 ZEE TV
247 NEO Cricket
248 SBTN (Vietnamese)
252 TV5 MONDE (French)
255 RTN (Russian)
257 KO-AM TV

On Demand & Pay-Per-View

420-425 ESPN Sports PPV
440 NBA League Pass HD
441-450 NBA League Pass
455-456 NHL Center Ice/
MLB Extra Innings HD
457-470 NHL Center Ice/
MLB Extra Innings
800 On Demand Movies & Events
801-803 iND Events
804 iND Events HD
846 Adult On Demand Movies
853 Playboy

MultiLatino

Available a la carte with subscription to Limited Basic

727 Galavisión HD

728 Galavisión
729 Telefutera
730 History en Español
731 Discovery en Español
733 Canal 52MX
734 Telemundo (Thurston, Mason & Lewis Counties)
735 mun2
737 Mexicana
739 TeleHit
740 Bandamax
741 De Película
742 De Película Classico
743 Ritmoson Latino
744 CB TV
745 Multimedios
746 WAPA America
747 TVE
749 Nuvo TV
750 Discovery Familia
756 CineLatino
757 CineMexicano
758 Gran Cine
759 Viendo Movies
760 CNN en Español
761 SUR
762 México TV
763 Telefórmula
769 Once TV
770 HITN
771 México 22
772 EWTN en Español
773 La Familia
774 TBN Enlace
775 Infinito
776 Latele Novela
777 HTV Musica
778 Video Rola
779 Teleritmo
780 MTV tr3s
781 ESPN Deportes
782 Fox Deportes
783 AYM Sports
784 Gol TV
942-946 Music Choice en Español

MultiLatino Plus

Includes Limited Basic and MultiLatino

MultiLatino Extra

Includes Limited Basic, Digital Economy and MultiLatino

MultiLatino Max

Includes Limited Basic, Digital Economy and MultiLatino

30 ROOT SPORTS NW
31 ESPN
32 ESPN2
34 NBC Sports
38 TLC
40 Nickelodeon
54 TNT
55 TBS Superstation
57 Spike TV
59 Syfy
62 VH1
63 MTV
66 Bravo
70 Golf Channel
118 PBS Kids Sprout
162 BBC America
504 Lifetime Movie Network
623 ESPN HD
624 ESPN2 HD
625 Golf Channel HD
626 NBC Sports Network HD
627 ROOT SPORTS NW HD
647 BBC America HD
652 Bravo HD
659 Spike HD
662 TNT HD
664 TBS HD
669 TLC HD
676 Syfy HD
679 Nickelodeon HD
687 VH1 HD
688 MTV HD
698 Lifetime Movie Network HD

MultiLatino Ultra

Includes Limited Basic, Digital Economy, Digital Preferred and additional channels on MultiLatino Max

XFINITY® CHANNEL LINE-UP (continued)

MyTV Choice	400 ESPN U	672 USA HD	271 INVESTIGATION DISCOVERY
35 FOOD NETWORK	402 ESPNEWS	676 SYFY HD	272 SCIENCE CHANNEL
38 TLC	412 CBS SPORTS NETWORK	682 OXYGEN HD	273 NATIONAL GEOGRAPHIC
43 ANIMAL PLANET	621 ESPN U HD	685 PALLADIA HD	646 BLOOMBERG HD
49 TRUTV	622 ESPNEWS HD	686 CMT HD	648 HEADLINE NEWS HD
51 LIFETIME	623 ESPN HD	687 VH1 HD	654 TRAVEL CHANNEL HD
52 A&E	624 ESPN2 HD	688 MTV HD	655 FOX NEWS CHANNEL HD
53 FX	625 GOLF HD	690 FUSE HD	656 FOX BUSINESS HD
55 TBS	626 NBC SPORTS HD	691 TV ONE HD	657 CNN HD
56 BET	627 ROOT SPORTS HD	693 G4 HD	658 CNBC HD
60 COMEDY CENTRAL	633 CBS SPORTS NETWORK HD	694 BIO HD	661 MSNBC HD
65 E! ENTERTAINMENT	647 BBC AMERICA HD	780 MTV TR3S	671 HISTORY HD
67 AMC	680 CARTOON NETWORK HD	Kids	673 NATIONAL GEOGRAPHIC CHANNEL HD
74 TV GUIDE NETWORK	Entertainment & Lifestyle	39 ABC FAMILY	674 HGTV HD
150 CSPAN3	50 OXYGEN	40 NICKELODEON WEST	695 PLANET GREEN HD
163 TV LAND	54 TNT	41 DISNEY CHANNEL	696 SCIENCE CHANNEL HD
232 BYUTV	58 USA	42 CARTOON NETWORK	Movies
233 EWTN	59 SYFY	118 PBS KIDS SPROUT	149 MOVIEPLEX
481 CENTRIC	61 CMT	120 NICK JR	166 FEARNET ON DEMAND
486 THE WORD NETWORK	62 VH1	121 THE HUB	500 HALLMARK MOVIE CHANNEL
651 E! ENTERTAINMENT HD	63 MTV	122 DISNEY XD	501 TCM
653 LIFETIME HD	64 MTV2	123 DISNEY JR.	503 IFC
664 TBS HD	66 BRAVO	126 NICKTOONS	504 LMN
665 FX HD	125 CURRENT TV	127 NICKELODEON EAST	505 SUNDANCE
667 ANIMAL PLANET HD	136 G4	215 TEEN NICK	513 INDIEPLEX
668 DISCOVERY CHANNEL HD	139 LOGO	677 DISNEY CHANNEL HD	514 RETROPLEX
669 TLC HD	161 GSN	678 ABC FAMILY HD	516 ENCORE FAMILY
670 A&E HD	183 STYLE	679 NICK HD	517 ENCORE HD
675 FOOD NETWORK HD	202 OVATION	680 CARTOON NETWORK HD	518 ENCORE
683 HSN HD	220 OWN	681 DISNEY XD HD	519 ENCORE LOVE
689 BET HD	275 BIO	News & Information	521 ENCORE SUSPENSE
692 QVC HD	471 CMT PURE COUNTRY	36 TRAVEL CHANNEL	523 ENCORE WESTERNS
697 AMC HD	472 MTV HITS	37 HISTORY	527 ENCORE DRAMA
702 HALLMARK HD	473 VH1 CLASSIC ROCK	44 CNN	529 ENCORE ACTION
704 COMEDY CENTRAL HD	474 VH1 SOUL	45 HEADLINE NEWS	586 FLIX
705 TRUTV HD	475 MTV JAMS	46 CNBC	698 LMN HD
706 THE WEATHER CHANNEL HD	476 FUSE	47 MSNBC	699 IFC HD
MyTV Choice Plus	482 GOSPEL MUSIC CHANNEL	48 FOX NEWS CHANNEL	701 TCM HD
31 ROOT SPORTS	483 TV ONE	68 HGTV	703 HALLMARK MOVIE CHANNEL HD
32 ESPN	484 GAC	101 WEATHERSCAN LOCAL	
33 ESPN2	502 WE TV	128 BLOOMBERG	
34 NBC SPORTS	649 WE TV HD	130 FOX BUSINESS	
42 CARTOON NETWORK	650 STYLE HD	159 NATIONAL GEOGRAPHIC WILD	
70 GOLF CHANNEL	652 BRAVO HD	201 PLANET GREEN	
162 BBC AMERICA	659 SPIKE HD	203 DIY	
179 COMCAST SPORTS NET	660 UNIVERSAL HD	204 COOKING CHANNEL	
274 MILITARY CHANNEL	662 TNT HD	222 DISCOVERY FIT & HEALTH	
	663 VELOCITY		

A minimum subscription to Limited Basic is required to receive other services or other levels of video programming. HD programming is only available to customers with an HDTV set (not provided by Comcast) and a digital converter with HDTV capabilities. A subscription to certain services may be required to receive certain HD programming. A monthly HD Technology fee is also required to receive HD programming. 3D programming is only available to customers with a minimum subscription to the Digital Starter package, a full 3D HDTV set (not provided by Comcast) and a digital converter with 3D/HD capabilities. A monthly 3D Technology fee and a monthly HD Technology fee are required to receive 3D programming. Channel offerings and required service levels are subject to change. Please contact 1-800-XFINITY with questions.

SA6CFOXP

EXHIBIT 3



Jan 12, 2012

Davis Wright Tremaine LLP
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, DC 20006

To Whom It May Concern:

Media Business Corporation ("MediaBiz") utilizes a multi-step process to accurately identify cable client franchise areas and associated ZIP and ZIP+4 Codes. (A ZIP+4 Code includes the five digits of the United States Postal Service ZIP Code, a hyphen, and four more digits that determine a more precise location than the ZIP Code.)

MediaBiz developed this methodology to address the potential shortcomings in utilizing 5-digit ZIP Code data for "Effective Competition" petitions. This basic methodology has been in place for several years and has been used successfully in many Effective Competition cases at the FCC.

Because ZIP Codes and municipal boundaries are created and managed by different government authorities, the boundaries of ZIP Codes and municipal boundaries often overlap. ZIP Codes frequently span between and beyond municipal boundaries. ZIP+4 Codes, however, usually reside in one and only one municipality. MediaBiz uses Place, Minor Civil Division (MCD), and County boundaries from Dynamap®, a division of Pitney Bowes Business Insight, to determine municipal boundaries. MediaBiz uses the Dynamap® ZIP+4 Centroids database, which contains ZIP+4 centroid correspondence for virtually all deliverable ZIP+4s, to identify ZIP+4 Codes within municipal boundaries, among the over 60 million ZIP+4s in all 50 states, DC, and Puerto Rico, based on current data from the USPS and the U.S. Bureau of the Census, and the Tele Atlas master street database.

MediaBiz then utilizes its ZIP+4 Code mapping to enable our clients to obtain proper "Direct-to-Home" (DTH) subscriber counts for their respective franchise areas by tracking DTH subscribers at the ZIP+4 Code level. (Where MediaBiz determines that a ZIP Code falls entirely within a franchise area, however, it is unnecessary to identify DTH subscribers at the ZIP+4 Code level for that 5-digit ZIP Code. In these instances, MediaBiz identifies such 5-digit ZIP Codes and, accordingly, DTH subscribers are identified by the 5-digit ZIP Code only.)

Only ZIP+4 Codes that meet specific criteria are included in this report. The following criteria must be met:

- The centroid of the ZIP+4 Code is within the franchise area; and
- The USPS ZIP+4 Record Type (from Dynamap® ZIP+4 Centroids) is either H - high-rise or S - street

Our methodology has been used by many multiple system operators (MSOs) as part of their Effective Competition relief efforts, and we believe this methodology produces the most accurate and detailed view of ZIP+4 data as it relates to cable franchise areas.


Robert Lehmann
President

MediaBiz

EXHIBIT 4

SBCA ECTR Summary Pages

ZIP+4 Data provided on CD included with the exhibit.

A hard copy of the ZIP+4 data is available upon request.

ECTR – Effective Competition Tracking Report



Provided by
Satellite Broadcasting and Communications Association

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated July 7, 2011 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: August 6, 2012

ZIP Codes

DTH Count

ZIP Codes	DTH Count
Requested total for Aberdeen, WA	1168

Data is current through 6/30/2012

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

ECTR – Effective Competition Tracking Report



Provided by
Satellite Broadcasting and Communications Association

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated July 7, 2011 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: August 6, 2012

ZIP Codes

DTH Count

Requested total for Elma, WA	254
------------------------------	-----

Data is current through 6/30/2012

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

ECTR – Effective Competition Tracking Report



Provided by
Satellite Broadcasting and Communications Association

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated July 7, 2011 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: August 6, 2012

ZIP Codes

DTH Count

Requested total for Hoquiam, WA	684
---------------------------------	-----

Data is current through 6/30/2012

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

ECTR – Effective Competition Tracking Report



Provided by
Satellite Broadcasting and Communications Association

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated July 7, 2011 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: August 6, 2012

ZIP Codes

DTH Count

Requested total for Montesano, WA	314
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Data is current through 6/30/2012

Report Prepared by:
Martin Esteves
Manager, Membership and Data Management
202-349-3630
mesteves@sbca.org

Methodology: Direct-To-Home (DTH) subscriber data reflects aggregated DIRECTV and DISH Network residential subscriber totals. The following data collection procedures are applied by Members in the normal course of business: a) single accounts with multiple receivers are only counted once; b) commercial and test accounts are not included; c) each occupied unit served in a multiple dwelling unit building has been counted as a separate residential subscriber; d) zip codes are taken from service locations (not billing addresses, where different); e) inactive accounts are routinely removed; f) invalid (undeliverable) addresses have been corrected where known; g) courtesy or complimentary accounts are included; and h) zip code information for Members' subscribers is periodically updated to reflect changes to zip codes by the United States Postal Service.

EXHIBIT 5

U.S. Census Bureau



H1

OCCUPANCY STATUS

Universe: Housing units

2010 Census Redistricting Data (Public Law 94-171) Summary File

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see <http://www.census.gov/prod/cen2010/pl94-171.pdf>

NOTE: Change to the California, Connecticut, Mississippi, New Hampshire, Virginia, and Washington P. L. 94-171 Summary Files as delivered.

		Aberdeen city, Washington
1	Total:	7,338
3	Occupied	6,476
of 3	Vacant	862

Source: U.S. Census Bureau, 2010 Census.

U.S. Census Bureau



H1

OCCUPANCY STATUS

Universe: Housing units

2010 Census Redistricting Data (Public Law 94-171) Summary File

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see <http://www.census.gov/prod/cen2010/pl94-171.pdf>

NOTE: Change to the California, Connecticut, Mississippi, New Hampshire, Virginia, and Washington P. L. 94-171 Summary Files as delivered.

		Elma city, Washington
1	Total:	1,307
3	Occupied	1,209
of 3	Vacant	98

Source: U.S. Census Bureau, 2010 Census.

U.S. Census Bureau



H1

OCCUPANCY STATUS

Universe: Housing units

2010 Census Redistricting Data (Public Law 94-171) Summary File

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see <http://www.census.gov/prod/cen2010/pl94-171.pdf>

NOTE: Change to the California, Connecticut, Mississippi, New Hampshire, Virginia, and Washington P. L. 94-171 Summary Files as delivered.

		Hoquiam city, Washington
1	Total:	3,938
3	Occupied	3,480
of 3	Vacant	458

Source: U.S. Census Bureau, 2010 Census.

U.S. Census Bureau



H1

OCCUPANCY STATUS

Universe: Housing units

2010 Census Redistricting Data (Public Law 94-171) Summary File

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see <http://www.census.gov/prod/cen2010/pl94-171.pdf>

NOTE: Change to the California, Connecticut, Mississippi, New Hampshire, Virginia, and Washington P. L. 94-171 Summary Files as delivered.

		Montesano city, Washington
1	Total:	1,684
3	Occupied	1,563
3	Vacant	121

Source: U.S. Census Bureau, 2010 Census.

EXHIBIT 6

	A	B	C	D	E
1	Community	State	Total DBS Subscribers	2010 Census Occupied Housing Units	% of DBS Penetration In Franchise Area Column C / Column D
2	ABERDEEN	WA	1,168	6,476	18.04%
3	ELMA	WA	254	1,209	21.01%
4	HOQUIAM	WA	684	3,480	19.66%
5	MONTESANO	WA	314	1,563	20.09%

CERTIFICATE OF SERVICE

I, Deborah D. Williams, do hereby certify on this 29th day of August, 2012 that a true and correct copy of the foregoing "Petition for Special Relief" has been sent via U.S. mail, postage prepaid to the following:

Honorable Bill Simpson
Mayor
City of Aberdeen
200 East Market
Aberdeen, WA 98520

Ms. Diana Easton
Clerk-Treasurer
City of Elma
PO Box E
Elma, WA 98541-0487

Honorable Jack Durney
Mayor
City of Hoquiam
609 8th St.
Hoquiam, WA 98550-3522

Honorable Ronald Schillinger
Mayor
City of Montesano
112 North Main Street
Montesano, WA 98563

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

William Lake, Chief, Media Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554


Deborah D. Williams