

Agency Tracking ID:PGC2243910 Authorization Number:207875

Successful Authorization -- Date Paid: 12/5/12 FILE COPY ONLY!!

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING (1) LOCKBOX #979089	FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVICE FORM 159 PAGE NO 1 OF 1	APPROVED BY OMB 3060-059 SPECIAL USE FCC USE ONLY
SECTION A - Payer Information		
(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) Western Pacific Broadcast, LLC		(3) TOTAL AMOUNT PAID (dollars and cents) \$1355.00
(4) STREET ADDRESS LINE NO. 1 400 N. Ashley Drive		
(5) STREET ADDRESS LINE NO. 2 Suite 3010		
(6) CITY Tampa	(7) STATE FL	(8) ZIP CODE 33602
(9) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 813-5794240		(10) COUNTRY CODE (IF NOT IN U.S.A.) US
FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED		
(11) PAYER (FRN) 0020401378		(12) FCC USE ONLY
IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)		
(13) APPLICANT NAME Western Pacific Broadcast, LLC		
(14) STREET ADDRESS LINE NO. 1 400 N. Ashley Drive		
(15) STREET ADDRESS LINE NO. 2 Suite 3010		
(16) CITY Tampa	(17) STATE FL	(18) ZIP CODE 33602
(19) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 813-5794240		(20) COUNTRY CODE (IF NOT IN U.S.A.) US
FCC REGISTRATION NUMBER (FRN) AND TAX IDENTIFICATION NUMBER (TIN) REQUIRED		
(21) APPLICANT (FRN) 0020401378		(22) FCC USE ONLY
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET		
(23A) FCC Call Sign/Other ID <p style="text-align: center;">wacp</p>	(24A) Payment Type Code(PTC) <p style="text-align: center;">TQC</p>	(25A) Quantity <p style="text-align: center;">1</p>
(26A) Fee Due for (PTC) <p style="text-align: center;">\$1,355.00</p>	(27A) Total Fee <p style="text-align: center;">\$1355.00</p>	FCC Use Only
(28A) FCC CODE 1 <p style="text-align: center;">RCNPHILA</p>	(29A) FCC CODE 2 <p style="text-align: center;">4</p>	
(23B) FCC Call Sign/Other ID		
(24B) Payment Type Code(PTC)		
(25B) Quantity		
(26B) Fee Due for (PTC)		
(27B) Total Fee		
(28B) FCC CODE 1		
(29B) FCC CODE 2		

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)
)
Carriage Complaint Against)
)
RCN Telecom Services of Philadelphia LLC)
)
by) File No. _____
)
Western Pacific Broadcast, LLC)
)
With Respect to Carriage Within the)
Philadelphia, PA Designated Market Area,)
of Local Commercial Television Station WACP,)
Licensed to Atlantic City, New Jersey)

Directed to: The Chief, Media Bureau

**PETITION FOR SPECIAL RELIEF
BY ORDER OF CARRIAGE**

Western Pacific Broadcast, LLC (“Western Pacific”), pursuant to FCC Rules 76.7 and 76.61, hereby respectfully requests that the Bureau order RCN Telecom Services of Philadelphia LLC (“RCN”) to carry local commercial television station WACP, licensed to serve Atlantic City, NJ (“WACP”), in accordance with the Commission’s must carry rules and policies on RCN’s cable system(s) within the Philadelphia, PA designated market area (the “DMA”) for the remaining duration of the current must carry election cycle, expiring December 31, 2014.

This petition is one of two petitions for special relief filed on this date against the two RCN cable operators who operate within the DMA. The other operator is RCN Telecom Services (Lehigh) LLC. While RCN serves the DMA with two separate companies, the facts and issues pertinent to this dispute are identical for the two cable operators.

In support of this petition, the following is respectfully submitted:

I. Factual Background

This Petition is the unfortunate culmination of frustrated attempts by Western Pacific to obtain carriage of WACP by RCN, in accordance with WACP's must carry rights. Western Pacific's efforts have involved sending two letters (an election then a demand) to RCN, neither of which was acknowledged in any way by RCN.

WACP is a new commercial television station, which commenced operation this summer. As a result of its status as a new station, Rule 76.64(f)(4) required it to notify local cable operators of WACP's initial election of carriage status within a window 60 days prior to commencing broadcasting and 30 days after commencing broadcasting. In accordance with that requirement, Western Pacific notified RCN by letter dated June 6, 2012 that WACP was commencing operation and elected mandatory carriage on RCN's cable systems operating in the DMA.¹ That letter was sent by certified mail to RCN's corporate offices in Princeton and its operational offices in Herndon, and was received by both RCN offices on June 11, 2012.² Under Rule 76.64(f)(4), that initial election took effect 90 days after it was made, which in the case of RCN was September 9, 2012.

RCN did not respond to that election letter. At the end of the 90-day notice period, it became apparent to Western Pacific that a more formal approach would be required to get RCN's attention. To preserve its rights to carriage, by letters dated September 14, 2012 and sent to those same two offices, Western Pacific demanded carriage of WACP pursuant to FCC Rule 76.61(a)(1), which states:

¹ A copy of that letter appears in **Exhibit 1**. The attachment to the letter is a list of all RCN CUIDs within the DMA as of the date of the letter.

² Copies of the US Post Office delivery receipts appear in **Exhibit 2**.

(1) Whenever a local commercial television station or a qualified low power television station believes that a cable operator has failed to meet its carriage or channel positioning obligations, pursuant to §§ 76.56 and 76.57, such station shall notify the operator, in writing, of the alleged failure and identify its reasons for believing that the cable operator is obligated to carry the signal of such station or position such signal on a particular channel.³

Faced with Western Pacific's carriage demand letter, Rule 76.61(a)(2) required RCN within 30 days after it received the letter to "either commence to carry the signal of such station in accordance with the terms requested or state its reasons for believing that it is not obligated to carry such signal or is in compliance with the channel positioning and repositioning and other requirements of the must-carry rules."⁴ RCN did not respond to this carriage demand letter by the October 18, 2012 deadline imposed by Rule 76.61(a)(2) for its response.⁵

At this juncture, Western Pacific can only conclude that RCN has had no intention of carrying WACP unless RCN is compelled by the Commission to do so.

Under Rule 76.61(a)(3)(iii), Western Pacific is entitled to file this Petition within sixty days of the date that is thirty days after the date of delivery of its carriage demand letter, if the

³ The demand letter appears in **Exhibit 3**.

⁴ Rule 76.61(a)(2), states:

(2) The cable operator shall, within 30 days of receipt of such written notification, respond in writing to such notification and either commence to carry the signal of such station in accordance with the terms requested or state its reasons for believing that it is not obligated to carry such signal or is in compliance with the channel positioning and repositioning and other requirements of the must-carry rules. If a refusal for carriage is based on the station's distance from the cable system's principal headend, the operator's response shall include the location of such headend. If a cable operator denies carriage on the basis of the failure of the station to deliver a good quality signal at the cable system's principal headend, the cable operator must provide a list of equipment used to make the measurements, the point of measurement and a list and detailed description of the reception and over-the-air signal processing equipment used, including sketches such as block diagrams and a description of the methodology used for processing the signal at issue, in its response.

⁵ As shown in post office return receipt notices appearing in **Exhibit 4**, those letters were received by RCN on September 19 or September 18.

Cable Operator has failed to respond to the Carriage Request in the manner required by Rule 76.61(a)(2). A response as required by the Rule, was due by October 18, 2012. As explained above, RCN did not respond to the demand letter. Accordingly, this Petition is filed within the deadline established by Rule 76.61(a)(3)(iii).

II. Discussion

RCN has the burden of showing that WACP is not entitled to carriage if WACP is a commercial television station local to the DMA.⁶ As shown below, WACP is a commercial television station that is local to the DMA.

(a) RCN Is a Cable Operator in the DMA.

RCN is a cable operator that operates one or more cable systems serving the DMA, as demonstrated by the Commission's list of community unit identification numbers for the counties within the DMA.⁷

(b) WACP Is Entitled to Mandatory Carriage on RCN's Cable System in the DMA.

WACP is entitled to carriage on cable systems located in the DMA if it is a "local commercial television station," as that term is defined in Rule 76.55(c). WACP is a commercial television station that is local to the DMA. In this regard, the Station is licensed to serve the community of Atlantic City, New Jersey, which is within the same television market as the cable system(s) operated by RCN in the DMA.⁸ WACP is licensed and operating on a channel regularly assigned to its community of license, channel 4.⁹ Finally, WACP either delivers a good quality signal to the principal headend of the cable system(s), or is entitled to carriage despite the

⁶ *Implementation of the Cable Television Consumer Protection and Competition Act of 1992, Broadcast Signal Carriage issues*, 8 FCC Rcd 2965, 2990 ¶102 (1993).

⁷ A list of the CUID's assigned as of June 2012 to the three RCN cable operators within the DMA is attached to the letter appearing in **Exhibit 1**.

⁸ *Broadcasting & Cable Yearbook*, at B-156 (ProQuest, LLC 2009).

⁹ Channel 4 is a DTV allotment assigned to Atlantic City by Rule 73.622(i).

delivery of a lower quality signal due to the Western Pacific's undertaking to be responsible for the costs of delivering a good quality signal or a baseband video signal to the cable system(s). WACP has been operating within the DMA since June of this year and did not elect to reserve its retransmission consent rights with respect to any cable system or area of the DMA for the current must carry election cycle.

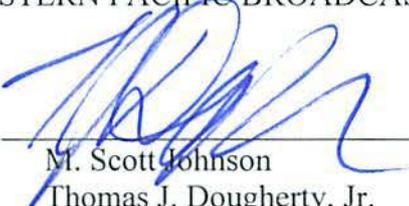
This Petition was preceded by both a written must carry election delivered to RCN and a subsequent written demand for carriage delivered to RCN, to which RCN has not responded.

III. Conclusion

WHEREFORE, the foregoing premises considered, Western Pacific Broadcast, LLC hereby respectfully requests that the Commission order RCN to carry the Station in accordance with the must carry rules and policies for the remaining duration of the current must carry election cycle, expiring December 31, 2014.

Respectfully submitted,

WESTERN PACIFIC BROADCAST LLC

By: 
M. Scott Johnson
Thomas J. Dougherty, Jr.
Its Counsel

FLETCHER, HEALD & HILDRETH, PLC
1300 North 17th Street, Suite 1100
Arlington, VA 22209
(703) 812-0400

December 5, 2012

EXHIBIT 1

{00464851-1}

 **Fletcher, Heald & Hildreth**

1300 NORTH 17th STREET, 11th FLOOR
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400
FAX: (703) 812-0486
www.fhhlaw.com
www.commlawblog.com

M. SCOTT JOHNSON
(703) 812-0474
SJOHNSON@FHHLAW.COM

THOMAS J. DOUGHERTY, JR.
(703) 812-0409
DOUGHERTY@FHHLAW.COM

June 6, 2012

Both Via Certified Mail. Return Receipt Requested

RCN Telecom Services LLC
650 College Road East
Princeton, NJ 08540
Attn: President or CEO

RCN Telecom Services (Lehigh) LLC
RCN Telecom Services of Philadelphia LLC
196 Van Buren Street, Suite 300
Herndon, Virginia 20170
Attn: Mr. Joseph Kahl

Re: Mandatory Carriage Election for WACP, Atlantic City, NJ

Dear President or CEO and Mr. Kahl:

Pursuant to Section 614 of the Communications Act of 1934, as amended, and Section 76.64(f)(4) of the rules of the Federal Communications Commission, this will inform you that Western Pacific Broadcast, LLC, the licensee of Television Station WACP, Atlantic City, NJ (the "Station") hereby elects mandatory carriage of the Station's television signal pursuant to FCC Rule 76.56(b) on all cable systems operated by any one or more of RCN Telecom Services, LLC, RCN Telecom Services (Lehigh) LLC, RCN Telecom Services of Philadelphia LLC, or any one or more of any of its or their direct or indirect subsidiaries or affiliates to the extent they serve the Philadelphia, PA Designated Market Area ("DMA"), including without limitation those community units listed on Exhibit A hereto. Carriage is sought solely within the DMA. The Station is a new station that is licensed to Atlantic City, NJ, which is part of the DMA. The Station is scheduled to begin commercial broadcasting on June 8, 2012. The Station will present the programming of Cannella Response Television, LLC, as well as other offerings of high quality programming. With reference to FCC Rule 76.56(b)(5), the Station will not substantially duplicate the signal of any other local commercial television station that is carried or retransmitted on your systems within the DMA and will not have a network affiliation duplicating that of a local commercial television station carried on your systems within the DMA.

The Station is assigned virtual channel 4 and elects carriage on that channel as of right under FCC Rule 76.57. Please be advised for purposes of complying with the FCC's material degradation requirement that the Station will commence broadcast with one program stream employing virtually the entire bit stream (19.4 mbps) of the channel.

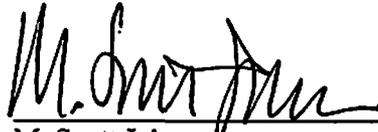
The Station is a local commercial television station as to all cable systems operating in the DMA, as defined in FCC Rule 76.55(c). For purposes of that definition, please be advised that in the event that the Station does not deliver an over the air signal of good quality as specified in FCC Rule 76.55 (c)(3) to

the principal headend(s) [as defined in FCC Rule 76.5(pp)] of the cable systems covered by this election, the Station will be responsible for providing equipment and bearing the costs of delivering such requisite signal of good quality to those headend(s) as required to comply with FCC Rule 76.55 (c), including without limiting the foregoing, the costs for any needed specialized equipment. Please note that this correspondence is not a demand for carriage; rather it is the election notice new stations are required to make under FCC Rule 76.64(f)(4).

Official correspondence in connection with this letter should be directed to the undersigned at the Fletcher, Heald & Hildreth, PLC address on this letterhead as the Station's contact person, with a copy to Mr. Bray at the address below.

Please contact the undersigned if you should have any questions concerning this matter.

Sincerely,



M. Scott Johnson
Thomas J. Dougherty, Jr.
Counsel for and Acting on Behalf of
Western Pacific Broadcast, LLC

cc: Matthew J. Bray, Vice President
Western Pacific Broadcast, LLC
400 N. Ashley Dr. Suite 3010
Tampa, FL 33602

EXHIBIT A - RCN TEL.SRV

Comm. Unit	Comm. Name	County Name	Legal Name	PSID	Address	City	ST
PA3751	REIGELSVILLE	BUCKS	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3368	MORTON	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3371	NORWOOD	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3372	RIDLEY	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3374	RIDLEY PARK	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3375	RUTLEDGE	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3376	SHARON HILL	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3377	TINICUM	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3380	COLLINGDALE	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3381	COLWYN	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3382	EDDYSTONE	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3383	FOLCROFT	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3384	GLENOLDEN	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3386	EAST LANSDOWNE	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3419	PROSPECT PARK BURGHOUGH	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA

PA3420	MILBOURNE BOROUGH	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3421	DARBY TOWNSHIP	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3422	UPPER DARBY TOWNSHIP	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3427	DARBY	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3429	CLIFTON HEIGHTS	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3435	LANSDOWNE	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3454	YEADON	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA0552	ALLENTOWN	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0556	CATASAUQUA	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0557	COPLAY	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0559	FOUNTAIN HILL	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0561	HANOVER	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0564	LOWER MACUNGIE	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0569	NORTH WHITEHALL	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0570	SALISBURY	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0571	SOUTH WHITEHALL	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0572	WHITEHALL	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA

PA0718	UPPER MACUNGIE	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0719	UPPER SAUCON	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1041	LOWHILL	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1263	HEIDELBERG	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3746	COOPERSBURG	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3747	ALBURTIS	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0551	ALLEN	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0553	BATH	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0554	BETHLEHEM	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0555	BETHLEHEM	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0558	EAST ALLEN	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0560	FREEMANSBURG	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0562	HANOVER	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0563	LEHIGH	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0565	LOWER SAUCON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0566	MOORE	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0567	NORTH CATASAUQUA	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA

PA0568	NORTHAMPTON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0720	HELLERTOWN	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0721	CHAPMAN	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1042	LOWER NAZARETH	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1258	BUSHKILL	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1289	UPPER NAZARETH	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1290	PLAINFIELD	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1291	PEN ARGYL	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1292	WIND GAP	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1381	NAZARETH	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2512	EASTON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2513	PALMER	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2514	WEST EASTON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2515	WILSON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2777	TATAMY	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2778	STOCKERTOWN	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2779	GLENDON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA

PA2780 FORKS	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2991 WASHINGTON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3119 ROSETO	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3120 BANGOR	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3276 WILLIAMS	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3349 CITY OF EAST BANGOR	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3749 WALNUTPORT	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA

Source: FCC Website List of CUIDs

EXHIBIT 2

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

7011 0470 0000 9266 4807

Postage	\$ 1.10	
Certified Fee	2.95	
Return Receipt Fee (Endorsement Required)	2.35	
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ 6.40	
Sent To: RCN Telecom Services LLC Street, Apt. No., or PO Box No.: 650 College Road East City, State, ZIP+4: Princeton, NJ 08540 Attn: President or CEO		
PS Form 3800, August 2006		See Reverse for Instructions

Received 6/11/2012
 MBJ

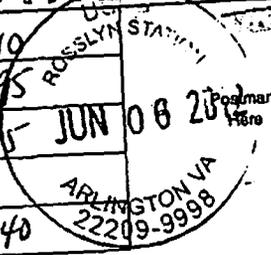
SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature: <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name): <i>[Name]</i> C. Date of Delivery: <i>6-8-12</i>
1. Article Addressed to: RCN Telecom Services LLC 650 College Road East Princeton, NJ 08540 Attn: President or CEO	D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:
	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.
	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

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Postage	\$ 1.10
Certified Fee	2.95
Return Receipt Fee (Endorsement Required)	2.35
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$6.40



Sent To
 RCN Telecom Services (Lehigh) LLC
 RCN Telecom Services of Philadelphia LLC
 196 Van Buren Street, Suite 300
 Herndon, VA 20170
 Attn: Mr. Joseph Kahl

PS Form 3800, August 2006

See Reverse for Instructions

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:

RCN Telecom Services (Lehigh) LLC
 RCN Telecom Services of Philadelphia LLC
 196 Van Buren Street, Suite 300
 Herndon, VA 20170
 Attn: Mr. Joseph Kahl

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X [Signature] Agent Addressee

B. Received by (Printed Name)
 JON LEVY

C. Date of Delivery
 6-8-12

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

2. Article Number (Transfer from service label) 7011 0470 0000 9266 4814

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

Received 6/11/2012
 MBG

EXHIBIT 3



Fletcher, Heald & Hildreth

1300 NORTH 17th STREET, 11th FLOOR
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400
FAX: (703) 812-0486
www.fhhlaw.com
www.commlawblog.com

M. SCOTT JOHNSON
(703) 812-0474
SJOHNSON@FHHLAW.COM

THOMAS J. DOUGHERTY, JR.
(703) 812-0409
DOUGHERTY@FHHLAW.COM

September 14, 2012

Both Via Certified Mail, Return Receipt Requested

RCN Telecom Services LLC
650 College Road East
Princeton, NJ 08540
Attn: President or CEO

RCN Telecom Services (Lehigh) LLC
RCN Telecom Services of Philadelphia LLC
196 Van Buren Street, Suite 300
Herndon, Virginia 20170
Attn: Mr. Joseph Kahl

Re: Mandatory Carriage Election for WACP, Atlantic City, NJ

Dear President or CEO and Mr. Kahl:

This letter is being delivered to you on behalf of Western Pacific Broadcast, LLC, the licensee of local commercial Television station WACP, licensed on channel 4 to serve the community of Atlantic City, NJ. This letter is a demand for carriage under FCC Rule 76.61(a)(1).

By letter dated June 6, 2012, and received by your offices on June 8,¹ you were informed that WACP was commencing operation as a local commercial television station in the Philadelphia, PA Designated Market Area (the "DMA") and had elected mandatory carriage status.² As stated in that letter, as a cable operator within the DMA, FCC Rule 76.64(f)(4) required you to commence carriage of WACP by the date that is 90 days after that election. That 90 day period has ended, and our investigation has revealed that your system(s) within the DMA is not carrying WACP. This failure to commence continuous carriage within that 90 day period is a violation of FCC Rules, as well as the Communications Act of 1934, as amended. Although you received our carriage election notice, we have not received any communication from you indicating that you have a valid defense to carriage.

To be clear, WACP is entitled to carriage on your cable system(s) within the DMA. WACP has properly elected must carry status, and is a commercial television station which is local to the DMA.

¹ See U.S. Postal Service return receipt notification attached to this letter.

² A copy of that letter is attached.

Under FCC Rule 76.61(a)(2), you are required to respond to this letter in writing within 30 days of your receipt of this letter, and to either commence to carry the WACP signal in accordance with the terms requested in the attached carriage election letter or to state your reasons (if any) for believing that you are not obligated to carry the WACP signal.

It is our hope that carriage of the WACP signal on your cable system(s) within the DMA will commence promptly, and that this dispute will end with that carriage.

Official correspondence in connection with this letter should be directed to the undersigned at the Fletcher, Heald & Hildreth, PLC address on this letterhead as the Station's contact person, with a copy to Mr. Bray at the address below.

Please contact the undersigned if you should have any questions concerning this matter.

Sincerely,



M. Scott Johnson
Thomas J. Dougherty, Jr.
Counsel for and Acting on Behalf of
Western Pacific Broadcast, LLC

cc: Matthew J. Bray, Vice President
Western Pacific Broadcast, LLC
400 N. Ashley Dr. Suite 3010
Tampa, FL 33602

 **Fletcher, Heald & Hildreth**

1300 NORTH 17th STREET, 11th FLOOR
ARLINGTON, VIRGINIA 22209

OFFICE: (703) 812-0400
FAX: (703) 812-0486
www.fhhlaw.com
www.commlawblog.com

M. SCOTT JOHNSON
(703) 812-0474
SJOHNSON@FHHLAW.COM

THOMAS J. DOUGHERTY, JR.
(703) 812-0409
DOUGHERTY@FHHLAW.COM

June 6, 2012

Both Via Certified Mail, Return Receipt Requested

RCN Telecom Services LLC
650 College Road East
Princeton, NJ 08540
Attn: President or CEO

RCN Telecom Services (Lehigh) LLC
RCN Telecom Services of Philadelphia LLC
196 Van Buren Street, Suite 300
Herndon, Virginia 20170
Attn: Mr. Joseph Kahl

Re: Mandatory Carriage Election for WACP, Atlantic City, NJ

Dear President or CEO and Mr. Kahl:

Pursuant to Section 614 of the Communications Act of 1934, as amended, and Section 76.64(f)(4) of the rules of the Federal Communications Commission, this will inform you that Western Pacific Broadcast, LLC, the licensee of Television Station WACP, Atlantic City, NJ (the "Station") hereby elects mandatory carriage of the Station's television signal pursuant to FCC Rule 76.56(b) on all cable systems operated by any one or more of RCN Telecom Services, LLC, RCN Telecom Services (Lehigh) LLC, RCN Telecom Services of Philadelphia LLC, or any one or more of any of its or their direct or indirect subsidiaries or affiliates to the extent they serve the Philadelphia, PA Designated Market Area ("DMA"), including without limitation those community units listed on Exhibit A hereto. Carriage is sought solely within the DMA. The Station is a new station that is licensed to Atlantic City, NJ, which is part of the DMA. The Station is scheduled to begin commercial broadcasting on June 8, 2012. The Station will present the programming of Cannella Response Television, LLC, as well as other offerings of high quality programming. With reference to FCC Rule 76.56(b)(5), the Station will not substantially duplicate the signal of any other local commercial television station that is carried or retransmitted on your systems within the DMA and will not have a network affiliation duplicating that of a local commercial television station carried on your systems within the DMA.

The Station is assigned virtual channel 4 and elects carriage on that channel as of right under FCC Rule 76.57. Please be advised for purposes of complying with the FCC's material degradation requirement that the Station will commence broadcast with one program stream employing virtually the entire bit stream (19.4 mbps) of the channel.

The Station is a local commercial television station as to all cable systems operating in the DMA, as defined in FCC Rule 76.55(c). For purposes of that definition, please be advised that in the event that the Station does not deliver an over the air signal of good quality as specified in FCC Rule 76.55 (c)(3) to

the principal headend(s) [as defined in FCC Rule 76.5(pp)] of the cable systems covered by this election, the Station will be responsible for providing equipment and bearing the costs of delivering such requisite signal of good quality to those headend(s) as required to comply with FCC Rule 76.55 (c), including without limiting the foregoing, the costs for any needed specialized equipment. Please note that this correspondence is not a demand for carriage; rather it is the election notice new stations are required to make under FCC Rule 76.64(f)(4).

Official correspondence in connection with this letter should be directed to the undersigned at the Fletcher, Heald & Hildreth, PLC address on this letterhead as the Station's contact person, with a copy to Mr. Bray at the address below.

Please contact the undersigned if you should have any questions concerning this matter.

Sincerely,



M. Scott Johnson
Thomas J. Dougherty, Jr.
Counsel for and Acting on Behalf of
Western Pacific Broadcast, LLC

cc: Matthew J. Bray, Vice President
Western Pacific Broadcast, LLC
400 N. Ashley Dr. Suite 3010
Tampa, FL 33602

EXHIBIT A - RCN TEL.SRV

Comm. Unit	Comm. Name	County Name	Legal Name	PSID	Address	City	ST
PA3751	REIGELSVILLE	BUCKS	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3368	MORTON	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3371	NORWOOD	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3372	RIDLEY	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3374	RIDLEY PARK	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3375	RUTLEDGE	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3376	SHARON HILL	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3377	TINICUM	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3380	COLLINGDALE	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3381	COLWYN	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3382	EDDYSTONE	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3383	FOLCROFT	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3384	GLENOLDEN	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3386	EAST LANSDOWNE	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3419	PROSPECT PARK BROUGH	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA

PA3420	MILBOURNE BOROUGH	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3421	DARBY TOWNSHIP	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3422	UPPER DARBY TOWNSHIP	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3427	DARBY	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3429	CLIFTON HEIGHTS	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3435	LANSDOWNE	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA3454	YEADON	DELAWARE	RCN TEL.SRV OF PHILADELPHIA LLC	020192	196 Van Buren Street, Suite 300	HERNDON	VA
PA0552	ALLENTOWN	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0556	CATASAUQUA	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0557	COPLAY	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0559	FOUNTAIN HILL	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0561	HANOVER	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0564	LOWER MACUNGIE	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0569	NORTH WHITEHALL	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0570	SALISBURY	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0571	SOUTH WHITEHALL	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0572	WHITEHALL	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA

PA0718	UPPER MACUNGIE	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0719	UPPER SAUCON	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1041	LOWHILL	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1263	HEIDELBERG	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3746	COOPERSBURG	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA3747	ALBURTIS	LEHIGH	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0551	ALLEN	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0553	BATH	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0554	BETHLEHEM	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0555	BETHLEHEM	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0558	EAST ALLEN	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0560	FREEMANSBURG	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0562	HANOVER	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0563	LEHIGH	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0565	LOWER SAUCON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0566	MOORE	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0567	NORTH CATASAUQUA	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA

PA0568	NORTHAMPTON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0720	HELLERTOWN	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA0721	CHAPMAN	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1042	LOWER NAZARETH	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1258	BUSHKILL	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1289	UPPER NAZARETH	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1290	PLAINFIELD	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1291	PEN ARGYL	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1292	WIND GAP	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA1381	NAZARETH	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2512	EASTON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2513	PALMER	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2514	WEST EASTON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2515	WILSON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2777	TATAMY	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2778	STOCKERTOWN	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA
PA2779	GLENDON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON	VA

PA2780 FORKS	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON VA
PA2991 WASHINGTON	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON VA
PA3119 ROSETO	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON VA
PA3120 BANGOR	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON VA
PA3276 WILLIAMS	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON VA
PA3349 CITY OF EAST BANGOR	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON VA
PA3749 WALNUTPORT	NORTHAMPTON	RCN TEL.SRV (LEHIGH) LLC	000421	196 Van Buren Street, Suite 300	HERNDON VA

Source: FCC Website List of CUIDs

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Certified Fee	2.95
Return Receipt Fee (Endorsement Required)	2.35
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.40

Postmark: JUN 08 2012
 ARLINGTON VA 22209-9998

Sent To	RCN Telecom Services LLC
Street, Apt. No., or PO Box No.	650 College Road East
City, State, ZIP+4	Princeton, NJ 08540
	Attn: President or CEO

PS Form 3800, August 2006 See Reverse for Instructions

Received 6/11/2012
MBJ

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 <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>[Name]</i> C. Date of Delivery <i>6-8-12</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>
<p>1. Article Addressed to:</p> <p>RCN Telecom Services LLC 650 College Road East Princeton, NJ 08540 Attn: President or CEO</p>	<p>3. Service Type</p> <p><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>2. Article Number (Transfer from service label)</p> <p>7011 0470 0000 9266 4807</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

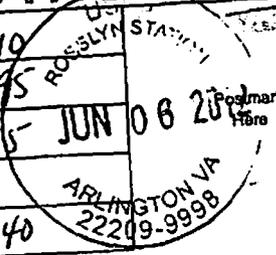
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OFFICIAL USE

Postage	\$ 1.10
Certified Fee	2.95
Return Receipt Fee (Endorsement Required)	2.35
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$6.40



Sent To: RCN Telecom Services (Lehigh) LLC
 RCN Telecom Services of Philadelphia LLC
 196 Van Buren Street, Suite 300
 Herndon, VA 20170
 Attn: Mr. Joseph Kahl

PS Form 3800, August 2006 See Reverse for Instructions

received 6/11/2012
 MBG

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 type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>RCN Telecom Services (Lehigh) LLC RCN Telecom Services of Philadelphia LLC 196 Van Buren Street, Suite 300 Herndon, VA 20170 Attn: Mr. Joseph Kahl</p>	<p>B. Received by (Printed Name) JON LEVY</p>	<p>C. Date of Delivery 6-8-12</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>2. Article Number (Transfer from service label)</p>	<p>3. Service Type</p> <p><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>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>7011 0470 0000 9266 4814</p>		

EXHIBIT 4

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:

RCN Telecom Services LLC
 650 College Road East
 Princeton, NJ 08540
 Attn: President or CEO

2. Article Number
(Transfer from service label)

7009 0080 0001 3561 9517

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- Agent
- Addressee

B. Received by (Printed Name)

Dress Perry

C. Date of Delivery

9-17-12

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

7009 0080 0001 3561 9517

U.S. Postal Service™
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Certified Fee	2.95
Return Receipt Fee (Endorsement Required)	2.35
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.40

Postmark Here
 SEP 14 2012
 ROSSLIN STATION
 WINSTON VA

Sent To: RCN Telecom Services LLC
 Street, Apt. No., or PO Box No.: 650 College Road East
 City, State, ZIP+4: Princeton, NJ 08540
 Attn: President or CEO

PS Form 3800, August 2006 See Reverse for Instructions

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:

RCN Telecom Services (Lehigh) LLC
 RCN Telecom Services of Philadelphia LLC
 196 Van Buren Street, Suite 300
 Herndon, VA 20170
 Attn: Mr. Joseph Kahl

2. Article Number
 (Transfer from service label)

7009 0080 0001 3561 9487

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Signature] Agent
 Addressee

B. Received by (Printed Name)

JON LEVY

C. Date of Delivery

9-17-12

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

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

7009 0080 0001 3561 9487

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage \$
 Certified Fee
 Return Receipt Fee
 (Endorsement Required)
 Restricted Delivery Fee
 (Endorsement Required)
 Total Postage & Fees \$



Sent To

Mr. Joseph Kahl
 RCN Telecom Services Lehigh & PA LLC
 196 Van Buren Street, Suite 300
 Herndon, VA 20170

PS Form 3800, August 2006

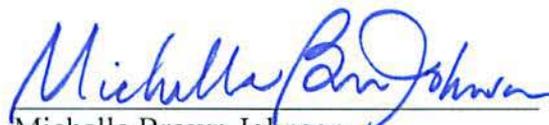
See Reverse for Instructions

CERTIFICATE OF SERVICE

I, Michelle Brown Johnson, hereby certify that on this 5th day of December, 2012, I caused a copy of the foregoing "Petition for Special Relief" to be served via U.S. mail, postage prepaid, and email upon the following entity:

RCN Telecom Services LLC
650 College Road East
Princeton, NJ 08540
Attn: President or CEO

RCN Telecom Services (Lehigh) LLC
RCN Telecom Services of Philadelphia LLC
196 Van Buren Street, Suite 300
Herndon, VA 22201
Attn: Mr. Joseph Kahl


Michelle Brown Johnson