

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

In re	)	
	)	
Gray Television Licensee, LLC	)	MB Docket 12-1
	)	CSR-_____
Request for Carriage of KSNB-TV	)	
Superior, NE	)	

**COMPLAINT FOR CARRIAGE**

Gray Television Licensee, LLC (“Gray”), licensee of KSNB-TV, Superior, Nebraska, pursuant to Section 614 of the Communications Act of 1934, as amended (the “Act”),<sup>1</sup> and Sections 76.7 and 76.61(a) of the Rules of the Federal Communications Commission,<sup>2</sup> hereby files this Complaint for Carriage against Antilles Wireless LLC (“Operator”) seeking the issuance of a Commission order requiring the carriage of KSNB-TV’s primary program transport stream on Operator’s cable system(s) serving the communities identified in Exhibit 1 (the “Communities”). Operator has refused to carry KSNB-TV on its system(s) in contravention of the mandatory carriage provisions of Section 614 of the Act. Accordingly, KSNB-TV requests that the Commission order Operator to initiate carriage of KSNB-TV forthwith.

**I. KSNB-TV DEFAULTED TO MUST CARRY STATUS AND IS TIMELY FILING THIS COMPLAINT.**

Gray is entitled to exercise KSNB-TV’s must carry rights in the Communities. The former licensee did not make an election of retransmission consent or must carry for the Communities by the October 1, 2011 deadline. Therefore, under Commission rules, KSNB-TV

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<sup>1</sup> 47 U.S.C § 534.

<sup>2</sup> 47 C.F.R. §§76.7, 76.61.

is deemed to have elected must carry status for Communities for the entire 2012-2014 carriage cycle.<sup>3</sup>

This complaint is timely filed. Under Commission rules, a cable operator must respond to a demand for carriage within thirty days of receipt of a written demand.<sup>4</sup> If the cable operator denies the licensee's request for carriage or fails to respond within the thirty-day deadline, the licensee must file a carriage complaint within sixty days after the cable operator's denial or within sixty days after the end of the thirty-day period, as applicable.<sup>5</sup> By letter dated January 15, 2013, KSNB-TV formally demanded carriage on Operator's system(s).<sup>6</sup> Operator received the letter on January 22, 2013. Thus, Operator was required to respond to the written request no later than February 21, 2013. Operator did not deny the carriage request during the thirty-day response period. Rather, Operator merely responded that it was unable to receive a good quality signal.<sup>7</sup> As a result, the sixty day period for filing this Complaint expires on April 22, 2013, and this Complaint is timely.

**II. KSNB-TV MEETS THE DEFINITION OF A "LOCAL COMMERCIAL TELEVISION STATION" AND THEREFORE IS ELIGIBLE TO INVOKE THE MANDATORY CARRIAGE PROVISIONS OF SECTION 614 OF THE COMMUNICATIONS ACT IN THE OPERATOR COMMUNITIES.**

KSNB-TV is eligible to invoke the mandatory carriage provisions of Section 614 of the Act. The Act and the Commission's Rules afford mandatory carriage rights to any "local

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<sup>3</sup> See 47 C.F.R. § 76.64(f)(3).

<sup>4</sup> §76.61(a)(2).

<sup>5</sup> §76.61(a)(5).

<sup>6</sup> All relevant correspondence is attached as Exhibit 2.

<sup>7</sup> Gray notes that operator did not provide a list of equipment it used to take measurements of KSNB-TV's signal as required under Section 76.61(a)(2) of the Commission's rules. In any event, Gray responded to operator's letter explaining that Operator has many options for receiving a good quality signal. Gray also has followed up on several occasions, but Operator still refuses to launch KSNB-TV in the Communities, forcing Gray to file this Complaint.

commercial television station” within the meaning of the must-carry rules.<sup>8</sup> The Commission defines a local commercial television station as any full-power commercial television station located within the same television market as a cable system that delivers an adequate signal to the cable system’s headend and whose carriage would not increase the cable operator’s copyright liability.<sup>9</sup> KSNB-TV satisfies these criteria and is therefore entitled to invoke the must-carry rights.<sup>10</sup>

**A. KSNB-TV and Operator’s System are Located within the Lincoln & Hastings-Kearney, Nebraska, DMA.**

KSNB-TV is a full-power commercial television station licensed to operate on Channel 4 in Superior, Nebraska.<sup>11</sup> Nielsen Media Research has assigned KSNB-TV to the Lincoln & Hastings-Kearney Designated Market Area (“DMA”).<sup>12</sup> Therefore, under Commission rules, the station’s local television market also is the Lincoln & Hastings-Kearney DMA.<sup>13</sup> All of the Communities also are located within the Lincoln & Hastings-Kearney DMA and, as such, all are located within the same television market as KSNB-TV.

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<sup>8</sup> See 47 U.S.C. § 534(h)(1); 47 C.F.R. § 76.55(c).

<sup>9</sup> 47 C.F.R. § 76.55(c).

<sup>10</sup> Operator is statutorily required to set aside up to one-third of its activated channels for use by local commercial television stations for its systems with more than twelve activated channels and must set aside three channels for use by local commercial television stations on systems with twelve or fewer activated channels. 47 U.S.C. § 534(b)(1).

<sup>11</sup> See FCC File No. BLCDT-20121001AOP.

<sup>12</sup> See BIA/Kelsey, *Investing in Television: Market Report 2011* (identifying DMA assignments applicable to the current carriage cycle).

<sup>13</sup> 47 C.F.R. § 76.55(e)(2).

**B. Operator's System Will Not Incur Copyright Liability for the Carriage of KSNB-TV.**

Because KSNB-TV is located within the same television market as the Operator Communities, KSNB-TV is a "local signal" under Section 111 of the Copyright Act. Carriage of KSNB-TV, therefore, would not expose Operator to any increased copyright liability.<sup>14</sup>

**C. KSNB-TV Provides an Adequate Quality Signal.**

KSNB-TV is capable of delivering an adequate signal to Operator's headend. KSNB-TV delivers a full power television signal throughout much of the Lincoln & Hastings-Kearney DMA. Moreover, Gray is the licensee of seven TV translators strategically located throughout the DMA. Finally, Gray rebroadcasts the programming of KSNB-TV on the multicast channel for co-owned station KOLN-TV. If, despite these multiple options for delivering KSNB-TV's signal, Operator still cannot receive an adequate over-the-air signal at its headend, Gray commits to purchasing and installing any additional equipment necessary to deliver an adequate signal. The Commission has repeatedly held that a cable operator cannot refuse to carry a television station that agrees to purchase and install at its own expense the equipment necessary to deliver an adequate signal to the operator's headend.<sup>15</sup>

**CONCLUSION**

Operator has no basis to refuse to carry KSNB-TV in the Operator Communities. For the foregoing reasons, KSNB-TV respectfully requests that the Commission order Operator to initiate carriage of KSNB-TV in the Operator Communities promptly.

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<sup>14</sup> 17 U.S.C. § 111.

<sup>15</sup> See *WMFP, Inc.*, 11 FCC Rcd 17264 (1996); *KSLs, Inc.*, 11 FCC Rcd 12718 (1996).

## VERIFICATION

To the best of our knowledge, information and belief formed after reasonable inquiry, this Complaint 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 it is not interposed for any improper purpose.

Respectfully submitted,

GRAY TELEVISION LICENSEE, LLC



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Kevin P. Latek  
Vice President, Law and Development  
Gray Television, Inc.  
4370 Peachtree Rd, NE  
Atlanta, GA 30319  
202-505-2401

April 11, 2013

**EXHIBIT 1**

<b>Community</b>	<b>CUID</b>
Albion	NE0016
Cedar Rapids	NE0258
Alma	NE0283
Franklin	NE0284
Red Cloud	NE0285
Palmer	NE0314
Republican City	NE0350
Spalding	NE0415
Central City	NE0509
Genoa	NE0513
Fullerton	NE0514
St. Edward	NE0515
Rising City	NE0519

**EXHIBIT 2**



Colins Broadcasting  
Corporation

January 15, 2013

General Manager  
USA Communications  
Antilles Wireless LLC  
Cable Nebraska LLC  
920 E 56<sup>th</sup> Street, Suite B  
Kearney, NE 68847

Dear General Manager:

Colins Broadcasting Corporation ("Colins") is the FCC licensee of KSNB-TV, Channel 4 in Superior, Nebraska. Nielsen Media Research assigns KSNB-TV to the Lincoln-Hastings-Kearney, Nebraska Designated Market Area ("DMA").

Colins is excited to announce the launch, as of December 3, 2012, of Antenna TV on the primary stream of KSNB-TV. Moreover, as you may know, Colins has requested FCC consent to assign the license of KSNB-TV to Gray Television Group, Inc ("Gray"). Colins expects to assign the license of the station to Gray in early 2013. At that time, retransmission of KSNB-TV may be governed by the terms of your existing retransmission consent agreement with Gray.

We understand that USA, Antilles Wireless and Cable Nebraska companies operate cable television systems serving the communities listed in Attachment A hereto. Because these communities are located in the same DMA as KSNB-TV, the 1992 Cable Act and the FCC's rules entitle the station to mandatory carriage of its signal on these cable systems, as well as any others located within the DMA.

According to our records, USA, Antilles Wireless and Cable Nebraska is not carrying the signal of KSNB-TV at this time. We are therefore compelled to provide you with this formal demand, pursuant to Section 76.61(a) of the FCC's rules, for mandatory carriage of KSNB-TV's signal on the cable systems serving the communities identified above.

We are happy to work with you to test the station's signal strength at the appropriate headend(s). In addition, we will undertake, at our sole cost, such efforts as are necessary to deliver a good quality signal to the cable system(s). In that regard, please contact Scott Barbee at (559) 805-5933 or [scott@antennatv.com](mailto:scott@antennatv.com) to arrange for signal delivery.

If you have any questions about this letter, please contact Scott Barbee. Thank you for your attention to this request.

Very truly yours,

*Thomas F. Mitts*  
Thomas F. Mitts  
President

cc: General Counsel  
USA Communications  
Antilles Wireless LLC  
Cable Nebraska LLC  
920 E 56<sup>th</sup> Street, Suite B  
Kearney, NE 68847

**Attachment A**  
(Cable Systems Primary Communities – Counties / Cities)

Boone County, NE  
Butler County, NE  
Franklin County, NE  
Greeley County, NE  
Harlan County, NE  
Merrick County, NE  
Nance County, NE  
Webster County, NE

KEARNEY NE 68847

Postage	\$0.45	0612
Domestic Post	\$2.95	16
Priority Mail	\$2.25	
Return Receipt Fee	\$0.00	
Signature Confirmation	\$5.75	01/16/2013

USA Communications  
920 E. 56th St. Suite B  
Kearney, NE 68847

12th 92th 0000 0426 TT02

2. Article Number (Transfer from service label) 7011 2970 0000 1426 4423  
PS Form 3811, February 2004 Domestic Return Receipt 10285-12-10-1510

1. Article Addressed to:  
USA Communications  
920 E. 56th St. Suite B  
Kearney NE 68847

3. Service Type  
 Certified Mail  
 Registered  
 Insured Mail  
 Restricted Delivery/Extra Fee  
 Yes  
 Express Mail  
 Return Receipt for Merchandise  
 C.O.D.

4. Restricted Delivery/Extra Fee  
 Yes

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

1. Article Addressed to:  
USA Communications  
920 E. 56th St. Suite B  
Kearney NE 68847

A. Signature  
 Agent  
 Addressee

B. Received by (Printed Name)  
 12213

C. Date of Delivery  
 1-22-13

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

Colins Broadcasting Corporation - 205 South West Street, Visalia, CA 93291



February 11, 2013

Thomas Mitts  
Colins Broadcasting  
205 South West Street  
Visalia, CA 93291

Dear Mr. Mitts:

We are in receipt of your letter dated January 15, 2013, as it relates to mandatory carriage of KSNB-TV. We are unable to receive the signal at our location at 2150 H Street in Central City, Nebraska; therefore, we will not be carrying the KSNB-TV signal at this time.

If you would like to have an engineer come to our site to test the station's signal strength, you are welcome to do so, please have your engineer contact our office to arrange a time to meet with our System Manager.

Sincerely,

A handwritten signature in black ink, appearing to read "Stuart Gilbertson", is written over a horizontal line.

Stuart Gilbertson  
Chief Operating Officer

## Troy Frankforter

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**From:** Brent Haun  
**Sent:** Tuesday, March 26, 2013 10:40 AM  
**To:** Troy Frankforter; Christie Urwiller  
**Cc:** stuart.gilbertson@usacomunications.tv  
**Subject:** RE: 2013 KSNB letter to USA Communications (Cable NE).docx

Christie,

Can you provide me with a contact to discuss signal delivery? If you currently are able to receive KOLN, you should be able to receive KSNB, as it is now also being simulcast within our KOLN stream on ch. 10.2.

I can be reached at 402.467.9218 or the email address below.

Thank you

Brent Haun  
Chief Engineer  
KOLN/KGIN/KSNB TV  
[Brent.haun@1011now.com](mailto:Brent.haun@1011now.com)

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**From:** Troy Frankforter  
**Sent:** Tuesday, March 26, 2013 9:34 AM  
**To:** Christie Urwiller  
**Cc:** stuart.gilbertson@usacomunications.tv; Brent Haun  
**Subject:** RE: 2013 KSNB letter to USA Communications (Cable NE).docx

Thank you for your response. Signal delivery has changed since Feb. 11, 2013 per our letter sent in March, and reception of our signal on one of our 3 transmitters should not be an issue. One of our engineers will be in touch.

Troy Frankforter  
Operations Manager  
KOLN/KGIN/KSNB

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**From:** Christie Urwiller [<mailto:christie.urwiller@usacomunications.tv>]  
**Sent:** Tuesday, March 26, 2013 9:23 AM  
**To:** Troy Frankforter  
**Cc:** 'Cortney Garrison'; [stuart.gilbertson@usacomunications.tv](mailto:stuart.gilbertson@usacomunications.tv)  
**Subject:** FW: 2013 KSNB letter to USA Communications (Cable NE).docx

Please find attached the letter that was sent to Thomas Mitts on February 11, 2013, as it relates to the KSNB carriage.

Thank you,

Christie Urwiller

Administrative Assistant

**From:** Troy Frankforter <[Troy.Frankforter@1011now.com](mailto:Troy.Frankforter@1011now.com)>  
**Date:** March 25, 2013, 4:43:24 PM CDT  
**To:** "[chris@usa-companies.net](mailto:chris@usa-companies.net)" <[chris@usa-companies.net](mailto:chris@usa-companies.net)>  
**Subject:** 2013 KSNB letter to USA Communications (Cable NE).docx

Chris,

Attached is a letter you would have received by March 15, requesting must-carry status for KSNB.

Please confirm carriage, effective date and channel placement on both analog and digital basic.

Thanks,  
Troy Frankforter  
Operations Manager  
KOLN/KGIN/KSNB  
Lincoln, NE

<2013 KSNB letter to USA Communications (Cable NE).docx>

## Troy Frankforter

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**From:** Troy Frankforter  
**Sent:** Monday, March 25, 2013 4:43 PM  
**To:** 'chris@usa-companies.net'  
**Subject:** 2013 KSNB letter to USA Communications (Cable NE).docx  
**Attachments:** 2013 KSNB letter to USA Communications (Cable NE).docx

Chris,

Attached is a letter you would have received by March 15, requesting must-carry status for KSNB.

Please confirm carriage, effective date and channel placement on both analog and digital basic.

Thanks,  
Troy Frankforter  
Operations Manager  
KOLN/KGIN/KSNB  
Lincoln, NE



March 11, 2013

Christian Hilliard  
USA Communications (Cable NE)  
PO Box 1057  
Kearney, NE 68848

Re: KSNB-TV, Channel 4

Dear Christian Hilliard:

KOLN/KGIN 10/11 is pleased to announce that, on February 25, 2013, we acquired from Colins Broadcasting Corporation the FCC license and essentially all other assets of television station KSNB-TV, which is licensed to Superior, Nebraska, in the Lincoln DMA. **KSNB-TV defaulted to must-carry status on all cable systems serving the Lincoln DMA for the current three-year carriage cycle.**

On March 3, 2013, Gray completed a technical upgrade of the station and ceased its broadcasts of the Antenna TV program service. As of today, KSNB-TV broadcasts a single program stream in High Definition from a tower located near York, Nebraska. In particular, KSNB-TV Channel 4.1 now broadcasts in HD the same programming that KOLN and KGIN and their network of low power translators have all broadcast in SD on their respective secondary channels for the past several years.

On or about April 1st, 10/11 will re-launch KSNB-TV as *10/11 Central Nebraska*, a high-definition broadcast channel focusing on the needs and interests of the greater Central Nebraska region. *10/11 Central Nebraska* features the area's first high-definition live 5:30 PM and 9pm newscasts. Both newscasts are devoted exclusively to the news weather and sports that matter most to the people of Central Nebraska. It is our goal to continue to find the best way to serve the people of Nebraska. Our purchase and operation of this new station is evidence of our commitment to bring more local choice to the people of Grand Island, Hastings, and Kearney and beyond.

KSNB-TV's programming will continue to include locally produced programming (i.e., newscasts at 5:30PM and 9:00PM, *Pure Nebraska*, *10/11 PrepZone Weekly*, and *Star City Buzz*). The lineup also includes popular primetime network programming from *MyNetworkTV* such as *House*, *Bones*, *Monk* and *Law & Order: SVU*, and syndicated favorites such as *30 Rock*, *Frasier*, & *the Husker Coaches Shows*. Much of the station's programming was or is originally produced in HD format.

KSNB-TV's former licensee may have contacted you about launching the station pursuant to its must-carry rights on your cable systems serving the Lincoln DMA. It appears that your cable system does not carry KSNB-TV, perhaps due to the station's previous inability to deliver a good quality signal to the applicable headend. In any event, our acquisition and control of the station now likely resolve any signal reception issues.

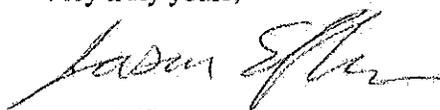
In particular, Gray is now able to deliver a good quality signal of KSNB-TV's program service through its network of full-power television stations and low power translators throughout the Lincoln market, in some places in SD format and in other places in HD format. This network is comprised of the following transmitters:

Station	RF Channel	Virtual Channel	Primary Channel	Secondary Channel
KOLN-TV, Lincoln	10	10	CBS-HD	KSNB simulcast
KGIN-TV, Grand Island	11	11	CBS-HD	KSNB simulcast
KSNB-TV, Superior	4	4	MYTV-HD	
K43FX, O'Neill	43	10	KOLN simulcast	KSNB simulcast
K32HI-D, Neligh	32	10	KOLN simulcast	KSNB simulcast
K25GM-D, Newport	25	10	KOLN simulcast	KSNB simulcast
K30FV-D, Cambridge	30	11	KGIN simulcast	KSNB simulcast
K33FF-D, Wallace	33	11	KGIN simulcast	KSNB simulcast
K24HG-D, Cozad	24	11	KGIN simulcast	KSNB simulcast
KNPL-LD, North Platte	25	11	KGIN simulcast	KSNB simulcast
K18CD-D, Lincoln	18	18	KSNB simulcast	KSNB simulcast

Gray is confident that KSNB-TV now delivers a good quality signal sufficient to qualify KSNB-TV for carriage on every cable system that carries KOLN or KGIN in the Lincoln. If necessary, we are happy to work with you to test the station's signal strength at the appropriate locations. In addition, we will undertake, at our sole cost, such efforts as are necessary to deliver a good quality signal to the headend. We elect carriage of KSNB-TV on cable channel position 4 consistent with the station's RF/Virtual Channel.

Please contact KOLN/KGIN Chief Engineer Brent Haun at 402-467-9218 or at [Brent.Haun@1011Now.com](mailto:Brent.Haun@1011Now.com) regarding any technical issues. Please contact Operations Manager Troy Frankforter at [Troy.Frankforter@1011Now.com](mailto:Troy.Frankforter@1011Now.com) regarding any other questions involving KSNB-TV.

Very truly yours,



Jason Effinger  
President, KOLN/KGIN/KSNB

cc via email: Mr. Brent Haun (KOLN/KGIN CE)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <i>* Sharon Catto</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)  <i>Sharon Catto</i></p> <p>C. Date of Delivery  <i>3/14/13</i></p>
<p>1. Article Addressed to:</p> <p>Christian Hilliard          USA Communications          PO Box 1057          Kearney, NE 68848</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>3. Service Type  <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input 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>2. Article Number          (Transfer from service label) <b>7010 2780 0000 1482 4783</b></p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102585-02-M-1540</p>	

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 KEARNEY, NE 68848

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Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	0.00
<b>Total Postage &amp; Fees</b>	<b>\$ 16.11</b>

Sent to  
 Street, Apt. No., or PO Box No. USA Communications  
 PO Box 1057  
 City, State, ZIP+4<sup>®</sup> Kearney, NE 68848

PS Form 3800, August 2006 See Reverse for Instructions

**CERTIFICATE OF SERVICE**

I, Rayya K. Khalaf, do hereby certify that on this 11th day of April 2013, I caused a copy of the foregoing **COMPLAINT FOR CARRIAGE** to be served by first-class mail, postage prepaid (except where indicated), to the following:

Steven A Broeckaert\*  
Deputy Bureau Chief, Media Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Room 3-C742  
Washington, DC 20554

Nancy Murphy\*  
Associate Chief, Media Bureau  
Federal Communications Commission  
455 Twelfth Street, S.W.  
Washington, DC 20554

Antilles Wireless LLC  
920 E. 56<sup>th</sup> Street  
Suite B  
Kearney, NE 68847

City of Albion, NE  
The City Hall  
420 West Market St.  
Albion, NE 68620

City of Alma, NE  
City Hall  
614 Main Street  
Alma, NE 68920

Village of Cedar Rapids, NE  
Cedar Rapids City Clerk  
425 W. Main Street  
Cedar Rapids, NE 68627

City of Franklin, NE  
619 15<sup>th</sup> Avenue  
Franklin, NE 68939

City of Red Cloud, NE  
540 N. Webster  
Red Cloud, NE 68970

Village of Palmer, NE  
802 Commercial Street  
Palmer, NE 68864

Village of Republican City, NE  
P.O. Box 36  
Republican City, NE 68971

Village of Spalding, NE  
P.O. Box 268  
Spalding, NE 68665

City of Central City, NE  
1515 17<sup>th</sup> Street  
Central City, NE 68826

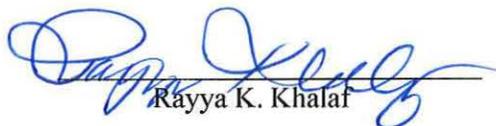
City of Genoa, NE  
City Clerk  
P.O. Box 279  
Genoa, NE 68640

City of Fullerton, NE  
City Administrator  
903 Broadway Street  
Fullerton, NE 68638

St. Edward, NE  
St. Edward City Hall  
1302 State Highway 39  
Saint Edward, NE 68660

Village of Rising City, NE  
Rising City Community Hall  
105 Main Street  
Rising City, NE 68658

\* Delivery via email

  
Rayya K. Khalaf