

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:)
)
Service Electric Cable Television, Inc.) Docket No. 13-68
) File No. CSR-8772-A
For Modification of the Philadelphia, PA)
Designated Market Area of Local)
Commercial Television Station WACP,)
Licensed to Atlantic City, New Jersey)

Directed to: The Chief, Media Bureau

**REPLY TO OPPOSITION TO
MOTION TO STRIKE AND LIMITED SURREPLY**

Western Pacific Broadcast, LLC (“Western Pacific”), licensee of commercial television station WACP (“WACP”), pursuant to Rule 76.7(d), hereby replies to the Opposition (the “Opposition to Motion”) of Service Electric Cable Television, Inc. (“Service Electric”) to Western Pacific’s Motion to Strike and Limited Surreply (the “Motion to Strike”) in the above-captioned proceeding.

***I. Service Electric Cannot Shift Its Failure to Obey the Rules
on to Western Pacific***

The majority of the Opposition to Motion reiterates and reinforces arguments that Service Electric made previously and which were not even addressed in the Motion to Strike. Certainly, there is no basis for considering those arguments.

There were two purposes of the Motion to Strike, each of which is evident from its contents. First, Western Pacific moved to strike Service Electric’s Reply to the extent that it added information that was missing from its market modification petition in violation of either Rule 76.7(a)(1) or Rule 76.59(b). Second, Western Pacific discussed a couple of new matters first raised in the Service Electric’s Reply because the very material implications of those matters

might not be fully appreciated from a reading of the Reply. The Motion to Strike did not address any of the new material set forth in the Reply in violation of Rule 76.7(a)(1) or Rule 76.59(b) that did not present these implications. Thus, the Motion to Strike did not discuss the maps, geographic coordinates or locations of communities which should have been in the market modification petition but were only added to the record in the Reply, after Western Pacific pointed out in its Opposition that these pieces of evidence were absolutely required. The Opposition to Motion once again reiterates why Service Electric thinks these pieces of evidence should be considered. Service Electric even goes so far as to claim without support that Western Electric has “wasted” its opportunity by not addressing them in the Motion to Dismiss, as though Western Pacific should be faulted for Service Electric’s failure to obey clear FCC procedural rules that Service Electric even quoted in its market modification petition.

Western Pacific will not address those omitted items again, and will not dignify Service Electric’s other arguments. Service Electric’s allegations are utterly unsupported by any evidence and illogical as to be ludicrous on their face. Western Pacific will confine this Reply to those matters that were raised in the surreply portion of its Motion to Dismiss.

II. Service Electric Has Distorted the Concept and Requirements of Showing a Lack of “Historical Carriage” of WACP

Service Electric neglects to mention that it is the first statutory factor is historical carriage, and that this statutory factor requires the Commission to consider carriage of not only the station at issue, but also stations having the same community of license as the subject station.¹ It was incumbent upon Service Electric to determine where WACP and WWSI were carried and to report this carriage in its petition, which it did not.

¹ Western Pacific Opposition at 13-17.

In the Opposition to Motion, Service Electric continues to urge that WACP is considered not “historically carried” because it is carried in the area only by cable operators who were forced to carry WACP under compulsion of must carry complaints. That assertion is simply not true as a factual matter in two respects. First, as Western Pacific reported in its Motion to Strike, Comcast carries WACP in the area in dispute and Western Pacific did not file a must carry complaint to encourage this carriage – Comcast’s carriage was and is voluntary. Second, the other cable operators who carry WACP in the area may have been the subject of must carry complaints, but those complaints were place-holder filings made to ensure that Western Pacific’s rights to enforce carriage were not forfeited by lapse of time. Not one of those cable operators opposed Western Pacific’s carriage demand and all started carriage after the time-consuming process of ensuring a good quality signal was concluded.

While false, Service Electric’s argument on coerced carriage also is incorrect as a matter of policy and law. As explained in the Motion to Dismiss, there is every reason to credit a case of carriage as historical carriage, even if the carriage followed a must carry complaint. The cases cited by Service Electric in its Reply simply do not and cannot support its notion that such carriage does not reflect the local market.

And again, for the first time, Service Electric attempts to offer a wholly-new argument for why it was not required to discuss the historical carriage of WACP, relying upon a 2011 case for the proposition that historical is relevant only “in the communities at issue.”² That case does not support that argument. In fact, the Bureau frequently looks at carriage in nearby communities to help to define the local market.³ Moreover, assuming for purpose of discussion that Service Electric has a valid point, then it should have discussed carriage of WACP in these

² Opposition to Motion, at 6.

³ Western Pacific Opposition at 10.

“in the communities at issue” in its Petition, because, as Western Pacific has shown, RCN overbuilt the Service Electric communities and RCN shows WACP in these communities.

III. Service Electric Has Distorted the Concept and Requirements of Showing a Lack of “Historical Carriage” of Competing Station WWSI

The Opposition to Motion makes arguments concerning the carriage of WWSI that could have and should have made in Service Electric’s Reply, as Western Pacific raised carriage of WWSI, as a direct competitor of WACP having the same community of license as WACP, in Western Pacific’s Opposition to the market modification petition. Service Electric’s untimely new arguments should not be considered. If, despite this procedural violation, these arguments are considered, the following information that provides the full context surrounding Service Electric’s arguments likewise should be considered.

Service Electric is correct in stating that it filed a petition to modify the market of WWSI in 2004 and that the Bureau responded by deleting Service Electric CUIDs from the WWSI market. But, the Bureau did not delete all of the Service Electric markets within the Philadelphia DMA. In fact, the list of deleted markets excludes 6 of 9 of Service Electric’s communities in Bucks County,⁴ excludes 11 of 21 of Service Electric’s communities in Lehigh County,⁵ and excludes 16 of 38 of Service Electric’s communities in Northampton County.⁶ And the fact that Service Electric now carries WWSI to all of its DMA communities, despite this market modification, indicates that Service Electric considers these communities within WWSI’s market. And, no matter how or why WWSI is carried, the Bureau could not remove any of the

⁴ Bridgeton, Springfield, Haycock, Richland and Milford.

⁵ Lower Macungie, Salisbury, Upper Milford, Whitehall, South Whitehall, Upper Macungie, Upper Saucon, Lower Milford, Low Hill, North Whitehall and Lynn,

⁶ Forks, Palmer, Plainfield, Williams, Lower Nazareth, Upper Nazareth, Upper Mount Bethel, Washington, Plainfield, Bushkill, East Allen, Moore, Lower Mount Bethel, Allen and Northampton.

Service Electric communities from WACP's market without creating the very discrimination between WWSI and WACP that Congress emphasized that the Commission should avoid in addressing market modification petitions. Service Electric's attempt to divert attention to how the WWSI TV signal is delivered simply misses the point: when the cable subscriber turns on its cable service, it can watch WWSI but cannot watch WACP. How that signal got to the subscriber is irrelevant to the discrimination issue as well as the must carry issue.⁷ In addition, the competing cable operators carry WWSI in the same and nearby communities as a local station in those communities, as they have not obtained a modification of WWSI's market as to them.

IV. Service Electric's New Argument that Western Pacific Should Have Known that the Cable System Was Incapable of Directing Which Communities Receive a Signal Is Not Creditable as The System Has This Capability at Least for Separating Its Programming Between the Philadelphia and New York City DMA Communities

Service Electric's Opposition to Motion argues, for the first time, that Western Pacific should have known that the carriage of WACP was "all-or-nothing" because all of its Philadelphia DMA communities are served by the same principal headend, which is PSID 001711.

This argument is both inaccurate and misleading. As is well known, a PSID is just an association of community units with a principal headend. The fact that a set of communities is attached to a single PSID does not mean that the cable system cannot be programmed to show certain signals in some of these communities and not in other of the communities. Accordingly, Service Electric is wrong in saying that the fact of the same PSID should have placed Western

⁷ The case cited in the Opposition to Motion in its footnote 10 has nothing to do with the claim that how a signal is received matters. And Western Pacific does not see how that matters here, as the signal test performed by Service Electric are fatally flawed.

Pacific on notice that the cable system could not carry the WACP signal to some but not all communities attached to the system.

Worse yet, Service Electric's claim that this inflexibility describes its cable system is belied by how this very same cable system operates. According to Commission records, the PSID of the system is 001711. This PSID is associated with Service Electric's communities in the four Pennsylvania counties included in the Philadelphia DMA, as well as Hunterdon County and Warren County, New Jersey CUIDs, which are within the New York City DMA.⁸

Attachments A and B to this pleading contain two channel lineups, one for the New York City DMA communities served by this system and a second for the Philadelphia DMA communities served by this system.⁹ They are different. They could not be different if the cable system could not control what signals are directed to which communities.

⁸ This is shown on the Bureau's CUID list.

⁹ Attachment A shows the "Lehigh Valley" lineup, which is the lineup for Berks, Bucks, Lehigh and Northampton Counties. It can be viewed at <http://www.sectv.com/PDF/LV%20Lineup.pdf>. Attachment B is the "Hunterdon" lineup which can be viewed at <http://www.sectv.com/PDF/HU%20Lineup.pdf>.

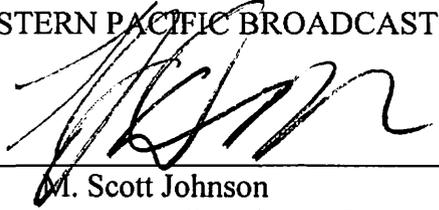
V. Conclusion

WHEREFORE, the foregoing premises considered, Western Pacific Broadcast, LLC hereby respectfully requests that the Bureau strike the portions of the reply discussed above and consider the other matters raised in this Reply.

Respectfully submitted,

WESTERN PACIFIC BROADCAST LLC

By: _____


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Attachment A

Lehigh Valley Channel Lineup

Video OnDemand

1	Video OnDemand
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Full Channel Lineup

2	SECTV2, Time, Weather
3	KYW-3 Philadelphia
4	WPHL-17 My17
5	WTFX-29 Fox Philadelphia
6	WPVI-6 ABC Philadelphia
7	PCN
8	WFMZ-69 Allentown
9	WWOR-9 My9 New York
10	WCAU-11 NBC Philadelphia
11	WPIX-11 CW New York
12	WLVT-39 PBS Allentown
13	WNYW-5 Fox New York
14	QVC
16	WUVP-65 Univision
17	WNBC-4 NBC New York
18	EWTN
19	WPPX-61 (ION)
20	LV Accu Weather
21	WHYY-12 Philadelphia
22	WTVB-51 NBC Reading
23	ESPN Classic
24	ESPN
25	ESPN 2
26	ESPNews
27	The Comcast Network
28	Comcast SportsNet
29	NFL Network
30	MLB Network
31	The Golf Channel
32	The Big Ten Network
33	TBS
34	TNT
35	USA
36	FX
37	CNBC
38	MSNBC
39	Fox News
40	CNN
41	CNN Headline News
42	The Discovery Channel
43	Animal Planet
44	Lifetime
45	A & E
46	MTV
47	VH-1
48	WGTW-48 Philadelphia
49	LV Ad Channel
50	Public Access (PEG)
51	WBPH-60 Bethlehem
52	Shop NBC
57	WPSG-57 CW Phila.
59	The Weather Channel
60	The Disney Channel
61	Disney XD
62	Cartoon Network
63	Nickelodeon
64	TV Land
65	ABC Family
70	TV Food Network
71	HGTV
72	WE
73	BET
77	The Learning Channel
78	The History Channel
79	The Travel Channel
80	Spike TV

81	CMT
82	SyFy Channel
83	American Movie Classics
84	Turner Classic Movies
85	Lifetime Movie Network
86	Comedy Central
87	Game Show Network
88	Disney Junior
89	E! Entertainment
90	National Geographic
91	The Speed Channel
92	Outdoor Channel
93	NBC Sports
94	Hallmark Channel
95	Telemundo
96	HSN
97	C-Span
98	C-Span 2
99	C-Span 3
102	SECTV2, Time, Weather
103	WALN
104	Antenna TV
106	Live Well
108	Retro TV (RTV)
109	ME TV
110	Philadelphia Nonstop
111	This TV
112	PBS Create
113	V-Me (PBS)
114	OWN
115	BBC America
116	WHYY 24-hr Arts & Culture
117	Inspiration Network
118	NASA
119	SoapNet
120	Oxygen
121	Bravo
122	TruTV
123	style.
124	Tango Traffic
125	Latin Unlimited TV
126	WTAP
129	Discovery Fit & Health
131	The Cooking Channel
260	Easton School District
261	Palisades School District
264	Parkland School District
266	Kutztown University

Ultimate Digital

132	Sprout
133	Boomerang
134	Nick Toons
135	Nick Jr.
136	Teen Nick
137	Nick Too
138	The Hub
139	The Science Channel
140	G4TechTV
141	DIY
142	Planet Green
143	The Military Channel
144	Investigation Discovery
145	H2
146	Biography
147	ABC News Now
148	Bloomberg Television
149	Fox Business Channel
150	Lifetime Real Women
151	Chiller
152	Independent Film Channel

153	Fox Movie Network
154	Reelz
155	Hallmark Movie Channel
156	Nat Geo Wild
161	Discovery Espanol
162	EWTN Espanol
163	Fox Deportes
164	Fox Soccer Channel
165	Fox Sports Atlantic
166	Fox Sports Central
167	Fox Sports Pacific
168	NHL Channel
169	NBA TV
170	Tennis Channel
171	FUEL
172	TVG (horseracing)
173	ESPNews
174	ESPNU
175	YES National
176	CBS College Sports
180	Big Ten Overflow Games
181	Big Ten Overflow Games
182	Big Ten Overflow Games
183	Big Ten Overflow Games
188	The Blaze
190	RFD TV
191	VH-1 Soul
192	CMT Pure Country
193	VH-1 Classic Rock
194	MTV2
195	MTV Jams
196	MTV Hits
197	MTV Spanish

Premiums

200	HBO Latino
201	HBO
202	HBO 2
203	HBO Signature
204	HBO Comedy
205	HBO Zone
206	HBO Family
207	Cinemax
208	MoreMax
209	ActionMax
210	ThrillerMax
211	@ Max
212	5Max
213	OuterMax
214	Wmax
215	Showtime
216	Showtime Too
217	Showtime 3
218	Showtime Extreme
219	Showtime Beyond
220	Showtime Next
221	Showtime Women
222	Showtime Family
223	FLIX
224	The Movie Channel
225	The Movie Channel Extra
226	Playboy
236	Starz
237	Starz Edge
238	Starz in Black
239	Starz Kids & Family
240	Starz Cinema
241	Encore
242	Encore Drama
243	Encore Love
244	Encore Mystery

245	Encore Action
246	Encore WAM
247	Encore Western

Pay-Per-View

227	iN DEMAND 1
228	iN DEMAND 2
229	iN DEMAND 3
230	iN DEMAND 4
231	iN DEMAND 5
232	iN DEMAND 6
233	iN DEMAND 7

Sports Packages

401	MLB/NHL Sports Pkg
402	MLB/NHL Sports Pkg
403	MLB/NHL Sports Pkg
404	MLB/NHL Sports Pkg
405	MLB/NHL Sports Pkg
406	MLB/NHL Sports Pkg
407	MLB/NHL Sports Pkg
408	MLB/NHL Sports Pkg
409	MLB/NHL Sports Pkg
410	MLB/NHL Sports Pkg
411	MLB/NHL Sports Pkg
412	MLB/NHL Sports Pkg
413	MLB/NHL Sports Pkg
414	MLB/NHL Sports Pkg
416	ESPN Gameplan/Full Court
417	ESPN Gameplan/Full Court
418	ESPN Gameplan/Full Court
419	ESPN Gameplan/Full Court
420	ESPN Gameplan/Full Court
421	ESPN Gameplan/Full Court
431	NBA League Pass
432	NBA League Pass
433	NBA League Pass
434	NBA League Pass
435	NBA League Pass
436	NBA League Pass
437	NBA League Pass
438	NBA League Pass
439	NBA League Pass
440	NBA League Pass

Ethnic Pay TV

248	RAI
249	The Filipino Channel
250	Zee TV USA
251	RTP International
252	The Greek Channel

Music Choice

301	Hit List
302	Hip Hop & R&B
303	MC Mixtape
304	Dance/Electronic
305	Rap
306	Hip Hop Classics
307	Throwback Jamz
308	R&B Classics
309	R&B Soul
310	Gospel
311	Reggae
312	Classic Rock
313	Retro Rock
314	Rock
315	Metal
316	Alternative

317	Classic Alternative
318	Adult Alternative
319	Soft Rock
320	Pop Hits
321	90's
322	80's
323	70's
324	Solid Gold Oldies
325	Party Favorites
326	Stage & Screen
327	Kidz Only!
328	Toddler Tunes
329	Today's Country
330	True Country
331	Classic Country
332	Contemporary Christian
333	Sounds of the Season
334	Soundscapes
335	Smooth Jazz
336	Jazz
337	Blues
338	Singers & Swing
339	Easy Listening
340	Classical Masterpieces
341	Light Classical
342	Musica Urbana
343	Pop Latino
344	Tropicales
345	Mexicana

High Definition

415	MLB/NHL Sports Pkg HD
502	TV2 HD
503	KYW-3 HD
504	WPHL-17 My 17 HD
505	WTFX-29 HD
506	WPVI-6 HD
507	WPSG-57 CW HD
508	WFMZ-69 HD
509	WWOR-9 HD
510	WCAU-10 HD
511	WPIX-11 HD
512	WLVT HD
513	WNYW-5 HD
514	QVC HD
515	The Weather Channel HD
516	WUPV-65 Univision HD
518	Fox Business Channel HD
519	WPPX-61 (ION) HD
521	WHYY-12 PBS HD
523	ESPNU HD
524	ESPN HD
525	ESPN 2 HD
526	ESPNews
527	The Comcast Network HD
528	Comcast SportsNet HD
529	NFL Network HD
530	MLB Network HD
531	Golf HD
532	The Big Ten Network HD
533	TBS HD
534	TNT HD
535	USA HD
536	FX HD
537	CNBC HD
538	MSNBC HD
539	Fox News HD
540	CNN HD
541	CNN Headline News HD
542	Discovery HD
543	Animal Planet HD
544	Lifetime HD
545	A&E HD
546	MTV HD

547	VH-1 HD
552	Shop NBC HD
560	Disney HD
562	Cartoon Network HD
563	Nickelodeon HD
565	ABC Family HD
566	Science Channel HD
567	Planet Green HD
568	Bravo HD
570	TV Food Network HD
571	HGTV HD
577	The Learning Channel HD
578	The History Channel HD
579	The Travel Channel HD
581	CMT HD
582	SyFy HD
583	AMC HD
585	Lifetime Movie Network
586	Comedy Central HD
589	E! Entertainment HD
590	National Geographic HD
591	The Speed Network HD
592	Outdoor Channel HD
593	NBC Sports
597	NHL Network HD
598	Reelz HD
601	HBO HD
602	Cinemax HD
603	Showtime HD
627	iN DEMAND HD
632	Sprout HD
645	H2 HD
646	Biography HD
676	CBS College Sports HD

HD Extra

620	MGM HD
621	HD Net Movies
622	axs.tv
626	Universal HD
629	NFL Red Zone
642	Velocity HD

Hispanic Tier

851	Univision
852	Telemundo
853	WAPA
854	La Familia
855	TBN Enlace USA
856	Cable Noticias
857	Cine Mexico
858	Latele Novela
859	Discovery Espanol
860	EWTN Espanol
861	ESPN Deportes
862	Fox News Espanol
863	LUTV
864	V-Me
865	MTV Tr3s
866	Nat Geo Mundo
867	Utilisima

Attachment B

Hunterdon Channel Lineup

Video OnDemand

1	Video OnDemand
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Full Channel Lineup

2	WCBS-2 CBS New York
3	KYW-3 CBS Philadelphia
4	WPHL-17 My17
5	WNYW-5 Fox New York
6	WPVI-6 ABC Philadelphia
7	WPXI-31 ION New York
8	WFMZ-69 Allentown
9	WWOR-9 My9 New York
10	WCAU-10 NBC Philadelphia
11	WPIX-11 CW New York
12	WLVT-39 PBS Allentown
13	WTXF-29 Fox Philadelphia
14	QVC
16	WXTV-41 Univision
17	WNBC-4 NBC New York
18	EWTN
19	WABC-7 ABC New York
20	LV Accu Weather
21	WHYY-12 Philadelphia
22	SECTV2, Time, Weather
23	WNJT-52 Trenton
24	ESPN
25	ESPN 2
26	MSG
27	YES
28	Comcast SportsNet
29	NFL Network
30	MLB Network
31	SportsNet NY
32	The Big Ten Network
33	TBS
34	TNT
35	USA
36	FX
37	CNBC
38	MSNBC
39	Fox News
40	CNN
41	CNN Headline News
42	The Discovery Channel
43	Animal Planet
44	Lifetime
45	A & E
46	MTV
47	VH-1
48	WMBC-63 Newton
50	Public Access (PEG)
51	WBPH-60 Bethlehem
52	Shop NBC
57	WPSG-57 CW Phila.
59	The Weather Channel
60	The Disney Channel
61	Disney XD
62	Cartoon Network
63	Nickelodeon
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65	ABC Family
70	TV Food Network
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83	American Movie Classics
84	Turner Classic Movies
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86	Comedy Central
87	Game Show Network
88	Disney Junior
89	E! Entertainment
90	National Geographic
91	The Speed Channel
92	Outdoor Channel
93	NBC Sports
94	Hallmark Channel
95	Telemundo
96	HSN
97	C-Span
98	C-Span 2
99	C-Span 3
100	The Golf Channel
101	The Comcast Network
102	SECTV2, Time, Weather
103	WALN
104	Antenna TV
106	Live Well
108	Retro TV (RTV)
109	ME TV
110	Philadelphia Nonstop
112	PBS Create
113	V-Me (PBS)
114	OWN
115	BBC America
116	WHYY 24-hr Arts & Culture
117	Inspiration Network
118	NASA
119	ScopNet
120	Oxygen
121	Bravo
122	TruTV
123	style.
125	Latin Unlimited TV
126	WTAP
129	Discovery Fit & Health
131	The Cooking Channel
262	Phillipsburg School District
263	Delaware Valley School

Ultimate Digital

132	Sprout
133	Boomerang
134	Nick Toons
135	Nick Jr.
136	Teen Nick
137	Nick Too
138	The Hub
139	The Science Channel
140	G4TechTV
141	DIY
142	Planet Green
143	The Military Channel
144	Investigation Discovery
145	H@
146	Biography
147	ABC News Now
148	Bloomberg Television
149	Fox Business Channel
150	Lifetime Real Women
151	Chiller
152	Independent Film Channel
153	Fox Movie Network
154	Reelz
155	Hallmark Movie Channel

156	Nat Geo Wild
161	Discovery Espanol
162	EWTN Espanol
163	Fox Deportes
164	Fox Soccer Channel
165	Fox Sports Atlantic
166	Fox Sports Central
167	Fox Sports Pacific
168	NHL Channel
169	NBA TV
170	Tennis Channel
171	FUEL
172	TVG (horseracing)
173	ESPNNews
174	ESPNU
176	CBS College Sports
180	Big Ten Overflow Games
181	Big Ten Overflow Games
182	Big Ten Overflow Games
183	Big Ten Overflow Games
188	The Blaze
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195	MTV Jams
196	MTV Hits
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201	HBO
202	HBO 2
203	HBO Signature
204	HBO Comedy
205	HBO Zone
206	HBO Family
207	Cinemax
208	MoreMax
209	ActionMax
210	ThrillerMax
211	@ Max
212	5Max
213	OuterMax
214	Wmax
215	Showtime
216	Showtime Too
217	Showtime 3
218	Showtime Extreme
219	Showtime Beyond
220	Showtime Next
221	Showtime Women
222	Showtime Family
223	FLIX
224	The Movie Channel
225	The Movie Channel Extra
226	Playboy
236	Starz
237	Starz Edge
238	Starz in Black
239	Starz Kids & Family
240	Starz Cinema
241	Encore
242	Encore Drama
243	Encore Love
244	Encore Mystery
245	Encore Action
246	Encore WAM
247	Encore Western

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228	iN DEMAND 2
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232	iN DEMAND 6
233	iN DEMAND 7

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407	MLB/NHL Sports Pkg
408	MLB/NHL Sports Pkg
409	MLB/NHL Sports Pkg
410	MLB/NHL Sports Pkg
411	MLB/NHL Sports Pkg
412	MLB/NHL Sports Pkg
413	MLB/NHL Sports Pkg
414	MLB/NHL Sports Pkg
416	ESPN Gameplan/Full Court
417	ESPN Gameplan/Full Court
418	ESPN Gameplan/Full Court
419	ESPN Gameplan/Full Court
420	ESPN Gameplan/Full Court
421	ESPN Gameplan/Full Court
431	NBA League Pass
432	NBA League Pass
433	NBA League Pass
434	NBA League Pass
435	NBA League Pass
436	NBA League Pass
437	NBA League Pass
438	NBA League Pass
439	NBA League Pass
440	NBA League Pass

Ethnic Pay TV

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249	The Filipino Channel
250	Zee TV USA
251	RTP International
252	The Greek Channel

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303	MC Mixtape
304	Dance/Electonica
305	Rap
306	Hip Hop Classics
307	Throwback Jamz
308	R&B Classics
309	R&B Soul
310	Gospel
311	Reggae
312	Classic Rock
313	Retro Rock
314	Rock
315	Metal
316	Alternative
317	Classic Alternative
318	Adult Alternative
319	Soft Rock
320	Pop Hits

321	90's
322	80's
323	70's
324	Solid Gold Oldies
325	Party Favorites
326	Stage & Screen
327	Kidz Only!
328	Toddler Tunes
329	Today's Country
330	True Country
331	Classic Country
332	Contemporary Christian
333	Sounds of the Season
334	Soundscapes
335	Smooth Jazz
336	Jazz
337	Blues
338	Singers & Swing
339	Easy Listening
340	Classical Masterpieces
341	Light Classical
342	Musica Urbana
343	Pop Latino
344	Tropicales
345	Mexicana

High Definition

502	WCBS-2 HD
503	KYW-3 HD
504	WPHL-17 My 17 HD
505	WTFX-29 HD
506	WPVI-6 HD
507	WPSG-57 CW HD
508	WFMZ-69 HD
509	WWOR-9 HD
510	WCAU-10 HD
511	WPIX-11 HD
512	WLVT HD
513	WNYW-5 HD
514	QVC HD
515	The Weather Channel HD
516	WUVP-41 Univision HD
518	Fox Busines Channel HD
521	WHYY-12 PBS HD
523	ESPNU HD
522	TV2 HD
524	ESPN HD
525	ESPN 2 HD
526	ESPNews
528	Comcast SportsNet HD
529	NFL Network HD
530	MLB Network HD
531	Golf HD
532	The Big Ten Network HD
533	TBS HD
534	TNT HD
535	USA HD
536	FX HD
537	CNBC HD
539	Fox News HD
540	CNN HD
541	CNN Headline News HD
542	Discovery HD
543	Animal Planet HD
544	Lifetime HD
545	A&E HD
546	MTV HD
547	VH-1 HD
552	Shop NBC HD
560	Disney HD
562	Cartoon Network HD
563	Nickelodeon HD
565	ABC Family HD
566	Science Channel HD

567	Planet Green HD
568	Bravo HD
570	TV Food Network HD
571	HGTV HD
577	The Learning Channel HD
578	The History Channel HD
579	The Travel Channel HD
581	CMT HD
582	SyFy HD
583	AMC HD
585	Lifetime Movie Network
586	Comedy Central HD
589	E! Entertainment HD
590	National Geographic HD
591	The Speed Network HD
592	Outdoor Channel HD
593	NBC Sports
597	NHL Network HD
598	Reelz HD
601	HBO HD
602	Cinemax HD
603	Showtime HD
627	iN DEMAND HD
632	Sprout HD
645	H2 HD
646	Biography HD
676	CBS College Sports HD

HD Extra

620	MGM HD
621	HD Net Movies
622	axs.tv
626	Universal HD
629	NFL Red Zone
642	Velocity HD

Hispanic Tier

851	Univision
852	Telemundo
853	WAPA
854	La Familia
855	TBN Enlace USA
856	Cable Noticias
857	Cine Mexico
858	Latele Novela
859	Discovery Espanol
860	EWTN Espanol
861	ESPN Deportes
862	Fox News Espanol
863	LUTV
864	V-Me
865	MTV Tr3s
866	Nat Geo Mundo
867	Utilisima

CERTIFICATE OF SERVICE

I, Valerie Admana, hereby certify that on this 23rd day of May, 2013, I caused a copy of the foregoing "Motion to Strike and Limited Surreply" to be served via U.S. mail, postage prepaid, and email upon the following persons shown below and on the cable franchising authorities shown on the attachment:

Mark Palchick, Esq.
Peter Gutmann, Esq.
Womble Carlisle Rice & Sandridge, PLC
1200 19th Street, NW
5th Floor
Washington, DC 20036

mpalchick@wcsr.com
pgutmann@wcsr.com



Valerie Admana

Alburtis Borough
730 Frankline St.
Alburtis, PA 18011

Allen Township
4714 Indian Trail Rd.
Northampton, PA 18067

Bangor Borough
197 Pennsylvania Avenue
Bangor, PA 18013-1922

Bath Borough
P.O. Box 37, 215 E. Main St.
Bath, PA 18014

Bethlehem Township
4225 Easton Avenue
Bethlehem, PA 18020

Borough of Emmaus
28 S 4 St.
Emmaus, PA 18049

Borough of Glendon
24 Franklin Street
Easton, PA 18042

Borough of Macungie
21 Locust St.
Macungie, PA 18062

Borough of Stockertown
P.O. Box 174
Stockertown, PA 18083

Borough of West Easton
237 7th Street
Easton, PA 18042

Borough of Wilson
2040 Hay Terrace
Easton, PA 18042

Bridgeton Township
P.O. Box 200
Upper Black Eddy, PA 18972

Bushkill Township
Municipal Building, RD #2
Nazareth, PA 18064

Catasauqua Borough
118 Bridge Street
Catasauqua, PA 18032

Chapman Borough
1400 Main St., Chapman
Bath, PA 18014

City of Allentown
435 Hamilton Street
Allentown, PA 18102

City of Bethlehem
10 E Church St.
Bethlehem, PA 18018

City of Easton
650 Ferry Street
Easton, PA 18042

Coopersburg Borough
5 N Main Street
Coopersburgh, PA 18036

Coplay Borough
2 South Second Street
Coplay, PA 18037

Durham Township
215 Old Furnace Road
Durham, PA 19038

East Allen Township
5344 Nor-Bath Boulevard
Northampton, PA 18067

East Bangor Borough
P.O. Box 328
East Bangor, PA 18013

Forks Township
1606 Sullivan Trail
Easton, PA 18040

Fountain Hill Borough
843 North Clewell Street
Fountain Hill, PA 18015

Freemansburg Borough
Broad and Elm Streets
Freemansburg, PA 18017

Greenwich Township
RD #1
Lenhartsville, PA 19534

Greenwich Township
775 Old Route 22
Lenhartsville, PA 19534

Hanover Township (Lehigh County)
2202 Grove Road
Allentown, PA 18103

Hanover Township (Northampton County)
38 West market Street
Bethlehem, PA 18018

Haycock Township
RD #3
Quakertown, PA 18951

Hellertown Borough
685 Main Street
Hellertown, PA 18055

Hereford Township
P.O. Box 225
Hereford, PA 18056

Longswamp Township
P.O. Box 37, RD #1
Mertztown, PA 19539

Longswamp Township
1112 State Street
Mertztown, PA 19539

Lower Macungie Township
3400 Brookside Road
Macungie, PA 18062

Lower Macungie Township
3400 Brookside Rd.
Macungie, PA 18062

Lower Milford Township
RD #2, Box 499A
Coopersburgh, PA 18036

Lower Mount Bethel Township
Box 213R
Martin Creek, PA 18083

Lower Mount Bethel Township
Route 611
Martins Creek, Pa 18063

Lower Nazareth Township
728 Walnut Street
Easton, PA 18042

Lower Saucon Township
RD #3
Bethlehem, PA 18015

Lowhill Township
RD #2
New Tripoli, PA 18066

Lynn Township
7911 Kings Highway
New Tripoli, PA 18066

Milford Borough
P.O. Box 86
Spinners Town, PA 18968

Moore Township
2491 Community Drive
Bath, PA 18014

Nazareth Borough
124 Belvidere Street
Nazareth, PA 18064

Nockamixon Townshiip
P.O. Box 100
Ferndale, PA 18921

North Catasaqua Borough
4th and Arch Streets
North Catasaqua, PA 18067

North Whitehall Township
P.O. Box 38
Schnecksville, PA 18078

Northampton Borough
1401 Laubach Ave.
Northampton, Pa 18067

Palmer Township
3 Weller Place, P.O. Box 3039
Palmer, PA 18045

Pen Argyl Borough
124 Belvidere Street
Nazareth, PA 18064

Plainfield Township
5292 Sullivan Trail
Nazareth, PA 18064

Plainfield Township
134 Broadway, Box 147
Bangor, PA 18013

Portland Borough
P.O. Box 47
Portland, PA 18351

Richland Township
1328 California Road
Quakertown, PA 18951

Riegelsville Borough
615 Easton Road
Riegelsville, PA 18077

Roseto Borough
P.O. Box 361
Roseto, PA 18031

Salisbury Township
3000 S. Pike St.
Allentown, PA 18103

Salisbury Township
2900 South Pike Avenue
Allentown, PA 18103

South Whitehall Township
4444 Walbert Avenue
Allentown, PA 18104

Springfield Township
2320 Township Rd.
Quakertown, PA 18951

Tatamy Borough
109 Broadway
Bangor, PA 18013

Tinicum Township
Box 253, Rd #1
Pipersville, PA 18947

Upper Macungie Township
RD #1
Breinigsville, PA 18031

Upper Milford
P.O. Box 210
Old Zionsville, PA 18068

Upper Mount Bethel Township
387 Ye Olde Hwy.
Mount Bethel, PA 18343

Upper Nazareth Township
6 East Lawn Road
Nazareth, PA 18064

**Upper Saucon Township
P.O. Box 278, Camp Meeting Rd.
Center Valley, PA 18034**

**Washington Township
4 Flicksville Road
Bangor, PA 18013**

**Weisenberg Township
Route 1, Box 174
Fogelsville, PA 18051**

**Whitehall Township
3219 Macarthur Rd.
Whitehall, PA 18052**

**Williams Township
655 Cider Press Road
Easton, PA 18042**

**Williams Township
RD #4, P.O. Box 457
Easton, PA 18042**

**Wind Gap Borough
29 Mechanic Street
Wind Gap, PA 18091**