

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

In the Matter of )  
 )  
Comcast Cable Communications, LLC, )  
on behalf of its subsidiaries and affiliates ) CSR No. \_\_\_\_\_  
 )  
For Determination of Effective Competition in: )  
8 Washington Franchise Areas )

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

**PETITION FOR SPECIAL RELIEF**

Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates (“Comcast”), pursuant to Sections 76.7 and 76.907 of the Commission’s rules,<sup>1</sup> requests that the Commission determine that Comcast faces “effective competition” in 8 Washington franchise areas (the “Franchise Areas”).<sup>2</sup>

The Communications Act of 1934, as amended (the “Act”), and the Commission’s rules provide that cable television rates may be regulated only in the absence of effective competition.<sup>3</sup> Cable operators are entitled to demonstrate that effective competition exists on a franchise-by-franchise basis.<sup>4</sup> When a cable operator demonstrates that effective competition exists within a franchise area, cable rates in the affected area are no longer subject to regulation.<sup>5</sup>

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<sup>1</sup> 47 C.F.R. §§ 76.7 and 76.907.

<sup>2</sup> The Franchise Areas include Brier (WA0325), Edmonds (WA0099), Everett (WA0091), Lynnwood (WA0204), Mill Creek (WA0396), Mountlake Terrace (WA0228), Mukilteo (WA0013), and Woodway (WA0550).

<sup>3</sup> 47 U.S.C. § 543(a)(2); 47 C.F.R. § 76.905(a).

<sup>4</sup> 47 C.F.R. § 76.907.

<sup>5</sup> See *Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992, Rate Regulation*, 8 FCC Rcd. 5631, ¶ 42 (1993) (“Rate Order”).

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

- (i) the franchise area is served by at least two unaffiliated multichannel video programming distributors ("MVPDs"), each of which offers comparable programming to at least 50 percent of the households in the franchise area; and
- (ii) the number of households subscribing to multichannel video programming offered by MVPDs other than the largest MVPD exceeds 15 percent of the households in the franchise area.<sup>6</sup>

As demonstrated below, the Competing Provider Test is satisfied in each of the Franchise Areas because two unaffiliated DBS providers serve over 50 percent of the Franchise Areas' households with programming comparable to Comcast, and the aggregate penetration rate reported for all "competing providers" exceeds the 15 percent threshold in each of the Franchise Areas.<sup>7</sup>

### **THE COMPETING PROVIDER TEST IS SATISFIED IN THE FRANCHISE AREAS**

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

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<sup>6</sup> 47 U.S.C. § 543(D)(1)(B)(i) and (ii); 47 C.F.R. § 76.905(b)(2)(i) and (ii).

<sup>7</sup> As explained below, the competing penetration figure for each of the communities at issue includes subscribers from local MVPD competitor Frontier Communications Northwest Inc. ("Frontier"), as well as from the two major DBS providers. Frontier's parent company, Frontier Communications Corporation, notes in its most recent Form 10-K filing that it is "the largest communications company providing services predominantly to rural areas and small and medium-sized towns and cities in the U.S." See <http://investor.frontier.com/annual-proxy.cfm>.

**1. Multiple Unaffiliated MVPDs Offer Comparable Programming to Over 50 Percent of the Households in the Franchise Areas.**

The first prong of the Competing Provider Test requires that a franchise area must be served by “at least two unaffiliated multichannel video programming distributors....”<sup>8</sup> This requirement is satisfied because the two major direct broadcast satellite providers (DirecTV, Inc. and Dish Network Corp.) (“DBS Providers”) are unaffiliated with Comcast and offer comparable programming to more than 50 percent of the households in the Franchise Areas.

MVPD service is deemed “offered” where it is both technically and actually available.<sup>9</sup> DBS service is presumed to be “technically available” throughout the country due to its nationwide satellite footprint.<sup>10</sup> As such, Comcast’s Franchise Areas are entirely within the satellite footprint of both DirecTV and Dish Network.

DBS service is presumed to be “actually available” if households in a franchise area are “reasonably aware” that the service is available.<sup>11</sup> The Commission has stated that “a party may use evidence of penetration rates in the franchise area (the second prong of the competing provider test ...) coupled with the ubiquity of DBS services to show that consumers are

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<sup>8</sup> 47 U.S.C. § 543(l)(1)(B)(i); 47 C.F.R. § 76.905(b)(2)(i). Section 602 of the Communications Act of 1934, as amended, defines “multichannel video programming distributors” to include cable operators, as well as DBS and MMDS providers. See 47 U.S.C. § 522(13).

<sup>9</sup> *Rate Order* ¶ 29.

<sup>10</sup> See *MediaOne of Georgia, Inc.; Petition for Revocation of the Certification of Gwinnett County, Georgia*, 12 FCC Rcd. 19406, ¶ 5 n.16 (1997) (citing *Rate Order*, at 5660-5661).

<sup>11</sup> See *Rate Order* ¶ 32 (citations omitted). See also *Charter Communications, LLC d/b/a Charter Communications Petition for Determination of Effective Competition in Fourteen North Carolina Communities et al.*, 19 FCC Rcd. 7003, ¶ 4 (2004).

reasonably aware of the availability of DBS service.”<sup>12</sup> DirecTV and Dish Network are among the largest MVPDs in the nation.<sup>13</sup> With approximately 34 million DBS subscribers nationwide<sup>14</sup> (comprising approximately 34 percent of all MVPD subscribers),<sup>15</sup> extensive DBS advertising, and the substantial DBS penetration in each of the Franchise Areas, it is clear that consumers throughout the Franchise Areas are “reasonably aware” of the availability of Comcast’s DBS competitors.<sup>16</sup>

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<sup>12</sup> *Comcast Cable Communications, LLC Petition for Determination of Effective Competition in Various Michigan Communities*, 23 FCC Rcd. 9595, ¶ 5 (2008) (“*Comcast – Various Michigan Communities*”) (citing *Mediacom Illinois LLC et al., Eleven Petitions for Determination of Effective Competition in Twenty-Two Local Franchise Areas in Illinois and Michigan*, 21 FCC Rcd. 1175 (2006)). Thus, the Commission has not required the production of advertising to demonstrate that households in the franchise area are “reasonably aware” of the availability of DBS service. See *Bright House Networks, LLC Petition for Determination of Effective Competition (Lake Alfred and Dundee, FL)*, 22 FCC Rcd. 4390, ¶ 6 (2007) (“*Bright House Networks – Florida*”) (“Over more than ten years, we have made hundreds of findings that households in particular franchise areas are reasonably aware that they may purchase DBS services based on localized evidence. These accumulated showings amount to substantial evidence that households in all franchise areas are reasonably aware that they may purchase DBS services. In at least one earlier reported decision, we found households in a franchise area to be reasonably aware that they may purchase DBS service solely based on evidence of DBS's nationwide growth and local subscriptions, without reference to advertising or other promotion.”).

<sup>13</sup> See *Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming (Fourteenth Order)*, 27 FCC Rcd. 8610, ¶ 31 (2012) (“*14<sup>th</sup> Report*”).

<sup>14</sup> See Press Release, DirecTV, *DirecTV Announces Fourth Quarter and Full Year 2012 Results* (Feb. 14, 2013) (reporting that, as of December 31, 2012, DirecTV (US) had 20.084 million subscribers), available at <http://investor.directv.com/releasedetail.cfm?ReleaseID=740312>; Press Release, DISH Network, *DISH Reports Year End 2012 Financial Results* (Feb. 20, 2013) (reporting that, as of December 31, 2012, Dish Network had approximately 14.056 million subscribers), available at <http://dish.client.shareholder.com/releasedetail.cfm?ReleaseID=741643>.

<sup>15</sup> See *14<sup>th</sup> Report* ¶ 31. See also Georg Szalai, *U.S. Pay-TV Industry Sub Growth Hits Low in 2012*, *The Hollywood Reporter*, Mar. 11, 2013 (citing SNL Kagan report of 100.4 million video subscribers by the end of 2012), available at <http://www.hollywoodreporter.com/news/us-pay-tv-industry-growth-427390>.

<sup>16</sup> See, e.g., *Comcas-Variou Michigan Communities* ¶ 5; *Bright House Networks – Florida* ¶ 6.

The Competing Provider Test also requires that the programming offered by these competing providers must be “comparable” to the programming offered by the petitioning cable operator.<sup>17</sup> The Commission’s rules expressly define comparable programming as “at least 12 channels of video programming, including at least one channel of nonbroadcast service programming.”<sup>18</sup> The Commission has repeatedly recognized that the DBS Providers offer comparable programming to Comcast and other cable operators under the Commission’s Competing Provider Test.<sup>19</sup> Each of the DBS Providers offer well over 100 video channels, most of which are non-broadcast services.<sup>20</sup> And, as shown in the attached channel line-up, Comcast’s programming service offerings in the Franchise Areas are substantially similar to the DBS Providers’ programming services.<sup>21</sup>

Based on the above facts, the first prong of the Competing Provider Test is satisfied in each of the Franchise Areas.<sup>22</sup>

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<sup>17</sup> See 47 U.S.C. § 543(l)(1)(B)(i); 47 C.F.R. § 76.905(b)(2)(i).

<sup>18</sup> 47 C.F.R. § 76.905(g).

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

<sup>20</sup> See Channel Line-up of DirecTV and Dish Network, attached hereto as Exhibit 1.

<sup>21</sup> See Comcast Channel Line-up, attached hereto as Exhibit 2.

<sup>22</sup> All of the legal positions taken above regarding the first prong of the Competing Provider Test were recently confirmed by the Commission in *Comcast Cable Communications, LLC, Petition for Determination of Effective Competition in Nine Minnesota Franchise Areas*, DA 13-862, ¶ 6 (rel. Apr. 24, 2013), and *Comcast Cable Communications, LLC, Petition for Determination of Effective Competition in Six Blaine, Minnesota Franchise Areas*, DA 13-863, ¶ 7 (rel. Apr. 24, 2013).

**2. The Competing Providers Serve Greater Than 15 Percent of the Households In Each of the Franchise Areas.**

The second prong of the Competing Provider Test requires that the subscriber base of competing MVPDs exceeds 15 percent of franchise area households. The Commission’s rules provide that once the first prong of the Competing Provider Test is satisfied (as it is with the DBS service offerings in this case), the subscribers of *all* qualifying MVPDs count toward the 15 percent penetration figure necessary for a determination of effective competition (even if they are not available themselves to more than 50 percent of local households).<sup>23</sup> In this case, Frontier offers competing cable service in each of the Franchise Areas.<sup>24</sup> Accordingly, the Competing Provider subscriber tallies presented in this Petition for the Franchise Areas include subscribers from Frontier, as well as from the two major DBS Providers (collectively, “Competing Providers”). The resulting penetration figures exceed the 15 percent threshold in each of the Franchise Areas:

Comcast obtained Frontier’s subscribership data for each of the Franchise Areas directly from Frontier.<sup>25</sup>

Because DBS Providers track their subscribers according to the ZIP codes where each subscriber resides (rather than by political jurisdiction), Comcast relied on a two-step process to determine the number of DBS subscribers within each Franchise Area.

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<sup>23</sup> See 47 C.F.R. § 76.905(f). See also *Time Warner Entertainment Co., L.P. et al. v. FCC*, 56 F.3d 151 (D.C. Cir. 1995) (holding that the subscribers of all MVPDs, other than the largest MVPD, may be aggregated to satisfy the 15 percent threshold).

<sup>24</sup> Frontier’s “comparable” channel line-up is attached hereto as Exhibit 3.

<sup>25</sup> Frontier provided the subscribership data on the condition that Comcast seek confidential treatment with respect to such information. Thus, Comcast submits Frontier’s subscriber figures for the Franchise Areas as **Confidential Exhibit 4** to this Petition (with a redacted version attached) and requests that the Commission provide confidential treatment of such information.

To determine the relevant ZIP+4 codes for the Franchise Areas, Comcast first contacted SNL Kagan (“SNL,” formerly known as “Media Business Corp.”). SNL has developed a process to accurately identify the ZIP+4 codes that correspond with the political boundaries of a particular community. This process utilizes enhanced mapping software that correlates ZIP+4 codes with political boundaries. With this software, SNL was able to identify the ZIP+4 codes that lie within each of the Franchise Areas.<sup>26</sup> The Commission has previously accepted ZIP+4 codes as “reasonable and sufficiently reliable for purposes of determining the presence of effective competition,”<sup>27</sup> and stated its preference for this approach.<sup>28</sup>

Comcast next provided all of the ZIP+4 codes identified for the Franchise Areas to the Satellite Broadcasting and Communication Association (“SBCA”). SBCA is the national trade association representing the two major DBS Providers, and it has assumed the responsibility for compiling subscribership data and responding to data requests from cable operators and franchising authorities engaged in effective competition proceedings. The DBS subscriber numbers reported in the attached Effective Competition Tracking Reports (“ECTRs”) from

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<sup>26</sup> See Letter from SNL (explaining ZIP+4 methodology), attached hereto as Exhibit 5.

<sup>27</sup> *Cable One, Inc. Petition for Determination of Effective Competition in Pocatello, Idaho*, 18 FCC Rcd. 12792, ¶ 8 (2003) (quoting *Falcon Cable Systems II, a California Limited Partnership, d/b/a Charter Communications Petition for Determination of Effective Competition in Twelve Oregon Cities*, 17 FCC Rcd. 4648 (2002)).

<sup>28</sup> See Public Notice, “Commission Announces New Standards for Showings of Effective Competition For Cable Service,” 23 FCC Rcd. 12067 (2008); Public Notice, “Commission Clarifies Standards for Evidence of Competing Provider Effective Competition for Cable Service,” 24 FCC Rcd. 8198 (2009).

SBCA reflect the total DBS subscribers within the individual ZIP+4 codes associated with the respective Franchise Areas.<sup>29</sup>

To determine whether the combined DBS and Frontier subscribership exceeds the 15 percent threshold in the Franchise Areas, Comcast compared the Competing Providers' combined subscribership to the most recent U.S. Census "occupied household unit" figures for each community.<sup>30</sup> This comparison yields the aggregate penetration rates for Competing Providers in each of the Franchise Areas:

<u>Franchise Area</u>	<u>Competing Providers' Penetration</u>
Brier	22.86%
Edmonds	16.21%
Everett	15.98%
Lynnwood	17.88%
Mill Creek	16.81%
Mountlake Terrace	17.88%
Mukilteo	15.24%
Woodway	19.87%

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<sup>29</sup> See **Confidential Exhibit 6**. This exhibit includes all of the relevant ZIP+4 data relied on in the Petition and the total ZIP+4-based DBS subscribers for each of the Franchise Areas. Comcast is providing a redacted version of this exhibit, which excludes the DBS subscribership numbers corresponding to the individual Franchise Areas in order to present the *aggregate* DBS and Frontier subscribership figures and still maintain the confidential nature of the Frontier subscribership tallies for the Franchise Areas. See *supra* n. 25.

<sup>30</sup> See Exhibit 7.

As detailed in **Confidential Exhibit 8**, the subscriber penetration rates for the Competing Providers in each of the Franchise Areas exceeds the 15 percent threshold required under Section 623(1)(1)(B) of the Act.<sup>31</sup> Accordingly, Comcast meets the second prong of the Competing Provider Test in each of the Franchise Areas.<sup>32</sup>

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<sup>31</sup> *See Confidential Exhibit 8.* This exhibit includes the combined DBS and Frontier subscribership and penetration figures for each of the Franchise Areas. As noted above, at Frontier's request, Comcast is seeking confidential treatment with respect to the Frontier subscribership data for the Franchise Areas. Accordingly, Comcast is providing a redacted version of this exhibit, which excludes the DBS-specific and Frontier-specific subscribership numbers associated with the Franchise Areas, in order to present the *aggregate* DBS and Frontier subscriber penetration figures and still maintain the confidential nature of the Frontier subscribership figures for these communities.

<sup>32</sup> Comcast has confirmed that it is the largest MVPD in each of the Franchise Areas. *See* Declaration of Frederick W. Giroux attached hereto.

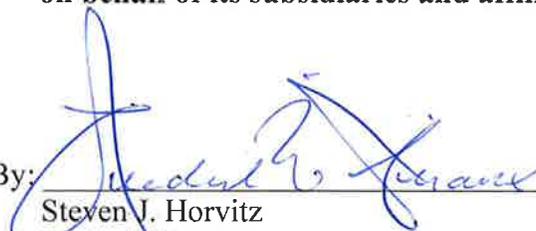
**CONCLUSION**

Comcast has demonstrated herein that it is subject to effective competition in each of the Franchise Areas under the Competing Provider Test. Based on the evidence presented herein, Comcast respectfully requests that the Media Bureau issue an order acknowledging the presence of effective competition in each of the 8 Washington Franchise Areas as of the filing date of this Petition.<sup>33</sup>

Respectfully submitted,

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

By:

  
Steven J. Horvitz

Frederick W. Giroux

**Davis Wright Tremaine LLP**

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July 19, 2013

Its Attorneys

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<sup>33</sup> See, e.g., *Time Warner Entertainment-Advance/Newhouse Partnership*, 26 FCC Rcd. 3829, ¶ 28 (2011) (“Consistent with our longstanding practice, the order herein is effective as of the date the petition herein was filed.”) (footnote omitted). See also *Charter Communications Entertainment I LLC*, 26 FCC Rcd. 5975, ¶ 28 (2011).

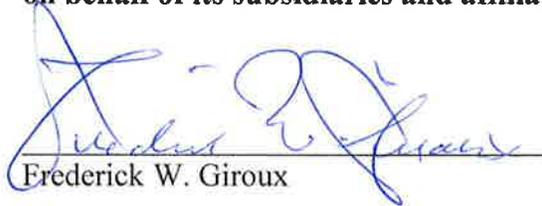
**CERTIFICATION PURSUANT TO 47 C.F.R. § 76.6(a)(4)**

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

Respectfully submitted,

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

By:

  
Frederick W. Giroux

**Davis Wright Tremaine LLP**  
1919 Pennsylvania Avenue, N.W., Suite 800  
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July 19, 2013

Its Attorneys

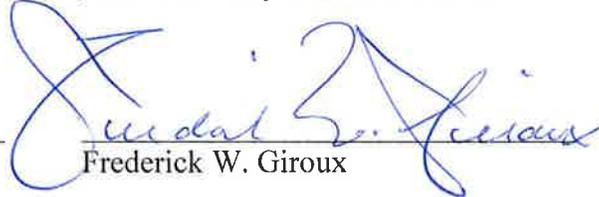
**DECLARATION OF FREDERICK W. GIROUX**

I, Frederick W. Giroux, declare, under penalty of perjury that the following is true and correct, to the best of my knowledge, information, and belief:

1. I am an attorney at the law firm of Davis Wright Tremaine, and have represented Comcast Cable Communications, LLC ("Comcast") in evaluating, preparing and prosecuting Petitions for determination of "effective competition."
2. I have reviewed the cable subscriber numbers provided by Comcast for the individual Franchise Areas at issue in this Petition, the DBS subscriber numbers provided by SBCA for the individual Franchise Areas, and the Frontier subscriber numbers as described in the Petition. Comcast is the largest multichannel video programming distributor in the Brier, Edmonds, Everett, Lynnwood, Mill Creek, Mountlake Terrace, Mukilteo, and Woodway Franchise Areas.

Date

7-19-13

  
Frederick W. Giroux

**EXHIBIT 1**



# ULTIMATE package

## 225+ digital channels

Print channels for ZIP Code 98036

PRINT

### EN ESPAÑOL

Cartoon Network (Este) HD	HD 296	ONCE México*	447	Univision Deportes	HD 455	V-me*	440
Enlace Christian Television*	448	Univision (Este)	HD 402	Univision On Demand	1402	mun2	410

### NATIONALS

3net (HD)	HD 107	Disney Channel (East)	HD 290	Independent Film Channel (IFC)	HD 559	RFD TV	345
A&E	HD 265	Disney Channel (West)	291	Investigation Discovery (ID)	HD 285	ReelzChannel	238
ABC Family	HD 311	Disney Junior Channel	HD 289	Jewelry Television	313	ReelzChannel On Demand	1238
AXSTV HD	HD 340	Disney XD	HD 292	Jewish Life Television*	366	SOAPnet	262
AXSTV HD On Demand	1340	Documentary Channel	267	Lifetime	HD 252	Science Channel	HD 284
American Movie Classics (AMC)	HD 254	E! Entertainment	HD 236	Lifetime Movie Network	HD 253	ShopNBC	316
Animal Planet	HD 282	ESPN	HD 206	Lifetime Movie Network On Demand	1253	Speed Channel	HD 607
Audience Network	HD 239	ESPN 3D (HD)	HD 106	Lifetime On Demand	1252	Spike	HD 241
Audience Network On Demand	1239	ESPN2	HD 209	Logo	272	Style	235
BBC America	HD 264	ESPNEWS	HD 207	Logo On Demand	1272	Style On Demand	1235
BYU TV	374	ESPNU	HD 208	MAVTV	219	Syfy Channel	HD 244
BabyFirstTV*	293	EWTN	370	MHz WORLDVIEW*	2183	TBS	HD 247
Big Ten Network	HD 610	FUEL TV	HD 618	MLB Network	HD 213	TCT Network	377
Biography Channel	HD 266	FX	HD 248	MSNBC	HD 356	TLC	HD 280
Black Entertainment Television (BET)	HD 329	FX Movie Channel	258	MTV	HD 331	TNT	HD 245
Bloomberg Television	HD 353	Food Network	HD 231	MTV2	333	TV Guide Network	273
Boomerang	298	Fox Business Network	HD 359	Military Channel	287	TV Land	HD 304
Bravo	HD 237	Fox News Channel	HD 360	NASA TV	346	TV Land On Demand	1304
CBS Sports Network	HD 613	Free Speech TV*	348	NBA TV	HD 216	TV One	328
CMT	HD 327	Fuse	339	NBCS	HD 220	TeenNick	303
CNBC	HD 355	GEM NET (Global Expansion Media Network)*	2068	NFL Network	HD 212	TeenNick On Demand	1303
CNBC World	357	GOD TV	365	NHL Network	HD 215	Tennis Channel	HD 217
CNN	HD 202	GSN	233	NRB	378	The Sportsman Channel - ELNUS	605
CSPAN 1	350	Galavision	404	Nat Geo WILD	HD 283	The Sportsman Channel On Demand-ELNUS	HD 1605
CSPAN 2	351	Golden Eagle Broadcasting*	363	National Geographic Channel	HD 276	The Word Network	373
Cartoon Network (East)	HD 296	Golf Channel	HD 218	Nick Jr.	301	Travel Channel	HD 277
Cartoon Network (West)	297	Great American Country	326	Nick Jr. On Demand	1301	Trinity Broadcasting Network (TBN)	372
Centric	330	H2	HD 271	Nick at Nite On Demand	1801	TruTV	HD 246
Chiller	257	H2 On Demand	1271	Nickelodeon (East)	HD 299	Turner Classic Movies (TCM)	HD 256
Christian Television Network (CTN)	376	HITN*	438	Nickelodeon (West)	300	UP	338
Church Channel	371	Hallmark Channel	HD 312	Nickelodeon On Demand	1300	USA Network	HD 242
Cloo	308	Headline News	HD 204	Nicktoons Network	302	VH1	HD 335
Comedy Central	HD 249	History Channel	HD 269	OWN	HD 279	VH1 Classic	337
Cooking Channel	HD 232	Home & Garden Television (HGTV)	HD 229	Ovation	274	Velocity	HD 281
Current TV	358	Home Shopping Network	240	Oxygen	251	WE: Women's Entertainment	260
DIY Network	HD 230	Hope*	368	PBS	0	WGN America	HD 307
Daystar	369	Hub	294	PBS Kids Sprout	295	Weather Channel	HD 362
Destination America	HD 286	INSP	364			World Harvest Television	367

## REDACTED - FOR PUBLIC INSPECTION

Discovery Fit & Health	261	ION Television  305	Pursuit Channel	604	n3D	 103
		ION Television West	QVC	275		

**PREMIUMS**

ENCORE (East)  535	ENCORE Family	542	ENCORE® ON DEMAND	1535	THE MOVIE CHANNEL™ ON DEMAND	1554
ENCORE (West) 536	ENCORE Love	537	Fox Soccer Channel  619		TVG - The Interactive Horseracing Network	602
ENCORE Action  541	ENCORE Suspense	539	Sundance Channel	558	The Movie Channel  554	
ENCORE Drama 540	ENCORE Westerns	538	Sundance ON DEMAND	1558	The Movie Channel (West)	555

**REGIONAL SPORT NETWORKS**

ROOT SPORTS Northwest  687						
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**SATELLITE RADIO**

SONICTAP: 60's Revolution	803	SONICTAP: College Rock	831	SONICTAP: Irish	883	SONICTAP: Retro Disco	845
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**SATELLITE RADIO**

SONICTAP: 70's Hits	804	SONICTAP: Dance	859	SONICTAP: Italian	881	SONICTAP: Rock en	878
SONICTAP: 8-Tracks	840	SONICTAP: Familiar	880	Bistro Blend		Espanol	
SONICTAP: 80's Hits	805	SONICTAP: Favorites		SONICTAP: Jazz	852	SONICTAP: Salsa	874
SONICTAP: 90's Hits	806	SONICTAP: Fiesta	870	SONICTAP: Latin Hits	871	SONICTAP: Showtunes	823
SONICTAP: Adult	832	Tropical		SONICTAP: Latin Jazz	879	SONICTAP: Silky Soul	843
Alternative		SONICTAP:	839	SONICTAP: Light	866	SONICTAP: Silver	822
SONICTAP: Adult	821	Flashback/New Wave		Classical		Screen	
Contemporary		SONICTAP: Folk Rock	813	SONICTAP: Love	819	SONICTAP: Singer-	836
SONICTAP:	834	SONICTAP: Full Metal	830	Songs		Songwriters	
Alternative		Jacket		SONICTAP: Malt Shop	802	SONICTAP: Smooth	851
SONICTAP: Bailamos!	869	SONICTAP: Gospel	827	Oldies		Jazz	
SONICTAP: Be-Tween	867	Glory		SONICTAP: Mariachi	876	SONICTAP: Soft Hits	849
SONICTAP: Beautiful	820	SONICTAP: Great	855	SONICTAP: Metro	853	SONICTAP: Spike	841
Instrumentals		Standards		Blend		SONICTAP:	858
SONICTAP: Big	801	SONICTAP: Groove	824	SONICTAP: Modern	814	SubTerranean	
Band/Swing		Lounge		Country		SONICTAP: Symphonic	864
SONICTAP: Bluegrass	812	SONICTAP: Hair	829	SONICTAP: Modern	860	SONICTAP: The	846
SONICTAP: Blues	854	Guitar		Workout		Boombox	
SONICTAP: Classic	837	SONICTAP: Hallelujah	828	SONICTAP: Musica De	872	SONICTAP: The	868
Hits Blend		SONICTAP: Hit	809	Las Americas		Playground	
SONICTAP: Classic	850	Country		SONICTAP: New Age	856	SONICTAP: The Spirit	826
Jazz Vocal Blend		SONICTAP: Holidays &	815	SONICTAP: Old	844	SONICTAP: Today's	816
SONICTAP: Classic	842	Happenings		School Funk		Hits	
R&B		SONICTAP: Honky	811	SONICTAP: PUMP!	861	SONICTAP:	808
SONICTAP: Classic	833	Tonk Tavern		SONICTAP: Rat Pack	807	Traditional Country	
Rock		SONICTAP: Hot Jamz	825	SONICTAP: Reality	838	SONICTAP:	884
SONICTAP: Classic	862	SONICTAP: Hottest	818	Bites		Tranquility	
Rock Workout		Hits		SONICTAP: Red, Rock	810	SONICTAP: Y2k Hits	817
SONICTAP:	848	SONICTAP: Hurbano	875	and Blues		SONICTAP: Zen	857
Coffeehouse Rock		SONICTAP: Hype	847	SONICTAP: Reggae	863		
		SONICTAP: Ink'd	835				

**LOCALS**

ION (ION)	33	KFFV	45	KONG	16	KZJO (MNT)	22
KBTC (PBS)	28	KING (NBC)	5	KSTW (CW)	11		
KCPQ (FOX)	13	KIRO (CBS)	7	KUNS (Univ)	51		
KCTS (PBS)	9	KOMO (ABC)	4	KVOS	12		

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

REDACTED - FOR PUBLIC INSPECTION

Local channels available in: Seattle-Tacoma WA ([Lookup another](#))

Network	Affiliate	Local Channel	IRD Channel	Broadcast Format
ABC	KOMO	4		HD
ABC	KOMO	4	961	Digital
AZA	KFFV	45	971	Digital
CBS	KIRO	7	963	Digital
CBS	KIRO	7		HD
CW	KSTW	11		HD
CW	KSTW	11	965	Digital
FOX	KCPQ	13		HD
FOX	KCPQ	13	966	Digital
IND	KVOS	12		HD
IND	KONG	16	967	Digital
IND	KONG	16		HD
ION	ION	33	347	Digital
MNT	KZJO	22	968	Digital
MNT	KZJO	22		HD
NBC	KING	5		HD
NBC	KING	5	962	Digital
PBS	KBTC	28	970	Digital
PBS	KCTS	9		HD
PBS	KBTC	28		HD
PBS	KCTS	9	964	Digital
UNI	KUNS	51	972	Digital
UNI	KUNS	51		HD

THERE'S SOMETHING FOR EVERYONE

America's Top 120

America's Top 200

America's Top 250

Smart Pack

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

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

A&E	A&E	118
ABC	ABC Family	180
ALIVE	America Live	219
ANGEL	Angel One	262
ANGL2	Angel Two	266
AXS	AXS TV	131
BT	Business Television	9602
BUY!	Buy!	221
TOON	Cartoon Network (E) <sup>sap</sup>	178
TOONW	Cartoon Network (W)	177
CCTV	CCTV-E	884
CCNEWS	CCTV-News	265
CHRH	Church Channel	259
CMT	CMT	189
CNBC	CNBC	203
CNN	CNN	200
COMDY	Comedy Central	107
CSPAN2	C-SPAN2	211
DYSTR	Daystar	253
DISC	Discovery Channel	182
DISC	Discovery Channel (E) <sup>sap</sup>	172
DISW	Discovery Channel (W)	173
DOC	Documentary Channel	197
EI	EI Entertainment Television	114
ESPN	ESPN	140
ESPN2	ESPN2	144
ESPN3	ESPN3	142
ESPN4	ESPN4	141
FOOD	Food Network	110
FXNEWS	FOX News Channel	205
FX	FX <sup>sap</sup>	136
GEMS	Gems & Jewelry TV	229
HGTV	HGTV	112
HIST	History	120
HNN	HLN	202
HRRV	HorseRacing TV	404
HSN	HSN	84
HSN2	HSN2	225
ICTV	In Country Television	230
INSP	Inspiration Network	259
ION	ION (E)	216
IONW	ION (W)	217
JTV	Jewelry Television	227
LIFE	Lifetime	108
MALL	Mail	220
MTV	MTV	160
MTV2	MTV2	161
NICK	Nick/Nick at Nite (E) <sup>sap</sup>	170
NICKW	Nick/Nick at Nite (W)	171
PRAYR	Prayer	256
QVC	QVC	137
REELZ	ReelzChannel	299
SALE	Sale	225
SHOP	shop	224
SHNBC	ShopNBC	228
SBN	SonLife Broadcasting Network	257
SPIKE	Spike TV	168
SYFY	Syfy	122
TBS	TBS <sup>sap</sup>	139
TLC	TLC	183
TNT	TNT <sup>sap</sup>	138
TRV	Travel Channel	198
TVGAM	TV Game Network	405
TVGN	TV Guide Network	117
TVLND	TV Land	106
USA	USA <sup>sap</sup>	105
VH1	VH1	182
TWC	Weather Channel	214
SiriusXM Music Channels		
Hopper		99
All other receivers		9002-9099
DishCD Music Channels		
Hopper		98
All other receivers		950-981

A&E	A&E	118
ABC	ABC Family	180
ALIVE	America Live	219
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HGTV	HGTV	112
HIST	History	120
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HSN	HSN	84
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ICTV	In Country Television	230
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JTV	Jewelry Television	227
LIFE	Lifetime	108
MALL	Mail	220
MTV	MTV	160
MTV2	MTV2	161
NICK	Nick/Nick at Nite (E) <sup>sap</sup>	170
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ESPN3	ESPN3	142
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FXNEWS	FOX News Channel	205
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VH1	VH1	182
TWC	Weather Channel	214
SiriusXM Music Channels		
Hopper		99
All other receivers		9002-9099
DishCD Music Channels		
Hopper		98
All other receivers		950-981

**General Channels\***

BABY1	BabyFirstTV	9400
BLOCK	Blockbuster Studio Channel	102
BYUTV	BYUTV	9403
CTN	Christian Television Network	267
ARTS	Classic Arts Showcase	9406
CSPAN	C-SPAN	210
DN101	DISH 101	101
EARTH	DISH Earth	287
HOME	DishHOME (not available on Hopper)	100
ENLCE	Enlace	9411
EWTV	Eternal Word Television <sup>sap</sup>	261
PREVW	Free Preview Guide	103

**Local Networks 2-70**

**Regional Sports Networks\***

Hopper	412
All other receivers	409-437

**Local Networks**

ABC CBS NBC FOX

**Regional Sports Networks\***

Hopper 412

All other receivers 409-437

BIO	Bio	119
BT	Bloomberg Television	203
BOOM	Boomerang <sup>sap</sup>	175
CHIEF	Chiller	199
CLOU	cloo	198
COOK	Cooking Channel	113
AMERJ	Destination America	194
DIY	DIY	111
ENCORE (E)	Encore (E)	340
ENCROW	Encore (W) <sup>sap</sup>	341
ENCRW	Encore Action	343
EADTM	Encore Drama	345
ENRAM	Encore Family	347
ELCWE	Encore Love	348
ESUSP	Encore Suspense	344
EWSTN	Encore Westerns	342
EPXDR	EPIX DRIVE-IN <sup>sap</sup>	292
FOXMO	Fox Movie Channel	133
FSC	Fox Soccer Channel	406
RJEL TV	RJEL TV	398
gmc	gmc	133
GAG	Great American Country (GAC)	165
H2	H2	121
HMC	Hallmark Movie Channel	187
MIL	Military Channel	195
MPLEX	MoviePlex	377
MUN2	mun2	838
NAT GEO WILD	Nat Geo WILD	190
NBCSP	NBC Sports Network	159
NICKT	Nicktoons Network	178
OUTCH	Outdoor Channel	398
RURAL	Rural TV	232
SPMAN	Sportsman Channel	395
TENNIS	Tennis Channel	400
TMC-W	The Movie Channel (W) <sup>sap</sup>	329
VERA	Veria	218
WHCL	WH1 Classic	163
DISH Music Channels		
Hopper		98
All other receivers		923-946

FSTV	Free Speech TV	9415
KBS	KBS World	9394
KTV	Kids & Teens Television (KTV)	264
LNK	Link TV	9410
NASA	NASA	212
ONPPV	Pay-Per-View Guide	500
PNTGN	Pantagon	9405
TBN	TBN	280
IMPCT	The Impact Network	9397
3ABN	Three Angels Broadcasting Network	9393
VME	V-ME	9414

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

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

\*Available with Multi-Sport Pack or a combination of America's Top 120 Plus package.

ALIVE	America Live	219
ANGEL	Angel One	262
ANGL2	Angel Two	266
APL	Animal Planet	184
Bio	Bio	119
BT	Bloomberg Television	203
BOOM	Boomerang <sup>sap</sup>	175
BUY!	Buy!	221
CBSN	CBS Sports Network	158
CCTVE	CCTV-E	884
CCNEW	CCTV-News	265
COOK	Cooking Channel	113
CSPAN2	C-SPAN2	211
DYSTR	Daystar	253
DIY	DIY	111
DOC	Documentary Channel	197
FOOD	Food Network	110
FXNEWS	FOX News Channel	205
GEMS	Gems and Jewelry	229
GAC	Great American Country (GAC)	165
HLWRK	Hallmark Channel	187
HMC	Hallmark Movie Channel	187
HLN	HLN	202
HSN	HSN	84
HSN2	HSN2	226
HUB	Hub	179
ICTV	In Country Television	230
JTV	Jewelry Television	227
MAIL	Mail	220
NICK	Nick/Nick at Nite (E)	170
NICKW	Nick/Nick at Nite (W)	171
NICKT	Nicktoons Network	178
OUTCH	Outdoor Channel	395
QVC	QVC	137
RFDIV	RFD-TV	231
SALE	Sale	225
SCI	Science	193
SHOP	shop	224
SHNBC	ShopNBC	228
TVLND	TV Land	106
TWC	Weather Channel	214



For the most up-to-date Channel Lineup Card, please visit [mydish.com/channelcard](http://mydish.com/channelcard).

# dish CHANNELS AND PACKAGES

## Premium Movie Packages

<b>HBO</b>			
HBO-E	HBO (E) SAP	HD	300
HBO2E	HBO2 (E) SAP	HD	301
HBO5G	HBO Signature SAP	HD	302
HBO-W	HBO (W) SAP	HD	303
HBO2W	HBO2 (W) SAP		304
HBOFM	HBO Family SAP	HD	305
HBOCY	HBO Comedy SAP	HD	307
HBOZ	HBO Zone	HDCM	308
HBOLT	HBO Latino	HD	309

## cinemax

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

## SHOWTIME

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

## STARZ

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

## Mini-Packs

<b>EPiX</b>			
EPIX1	EPIX 1 SAP	HD	380
EPIX2	EPIX 2 SAP	HD	381
EPIX3	EPIX 3 SAP	HDCM	382
EPXDR	EPIX DRIVE-IN SAP		292

## ENCORE Movie Pack

ENCRW	Encore (W) SAP		341
EACTN	Encore Action		343
EDRAM	Encore Drama		345
ENFAM	Encore Family		347
ELOVE	Encore Love		348
ESUSP	Encore Suspense		344
EWSTN	Encore Westerns		342
MPLEX	MoviePlex		377

## Mini-Packs

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

CTRC	Centric	HDCM	371
CI	Crime & Investigation	HDCM	368
ESUSP	Encore Suspense		344
EPIX1	EPIX SAP	HD	380
EPIX2	EPIX2 SAP	HD	381
EPIX3	EPIX3 SAP	HDCM	382
HMC	Hallmark Movie Channel	HD	187
HDNMV	HDNet Movies	HDCM	383
INDIE	IndiePlex	HDCM	378
LOGO	LOGO	HDCM	373
MAVTV	MAVTV American Real	HDCM	361
MGM	MGM	HDCM	385
MPLEX	MoviePlex		377
PLDIA	Paladia	HDCM	389
PIXL	Pixel	HD	388
RETRO	RetroPlex	HDCM	379
SMC	Sony Movie Channel	HDCM	386
SCINE	Starz Cinema		353
UNHD	Universal HD	HDCM	366
VELTY	Velocity	HDCM	384
WFN	World Fishing Network		394

## Heartland

BABY	Baby TV SAP		824
GMC	gmc		188
GSN	GSN	HD	116
HLMRK	Hallmark Channel	HD	195
HMC	Hallmark Movie Channel	HD	187
HUB	Hub	HD	179
OWN	OWN: Oprah Winfrey Network	HD	199
PIXL	Pixel SAP	HD	388
RFDTV	RFD-TV	HD	231
RURAL	Rural TV		232

## Outdoor Sports

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

## Multi-Sport

ESPCL	ESPN Classic		143
FSC	Fox Soccer Channel	HD	406
FUEL	FUEL TV		399
MLBN	MLB Network	HD	152
MLBSZ	MLB Network Strike Zone		153
NFL	NFL Network	HD	154
NFLRZ	NFL RedZone	HD	155
NBATV	NBA TV	HD	158
NHLN	NHL Network	HD	157
USN	Universal Sports		402

Plus over 25 Regional Sports Networks

# A WHOLE NEW ANIMAL IN WHOLE-HOME ENTERTAINMENT



Enjoy a great deal more with DISH

**Get Connected**  
Connect your DISH ViP® series DVR or Hopper receiver to your broadband internet service and gain instant access to thousands of On Demand movies and TV shows.  
Visit [mydish.com/getconnected](http://mydish.com/getconnected)

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

Get all the extras for nothing extra. Visit [dishperks.com](http://dishperks.com)

## Need some help?

- [mydish.com/support](http://mydish.com/support)
- [facebook.com/dish](https://facebook.com/dish)
- [twitter.com/dish](https://twitter.com/dish)
- DISH 101 - Support Channel (Ch. 101)



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**EXHIBIT 2**

xfinity<sup>®</sup>

XFINITY<sup>®</sup> TV  
Channel Line up



Effective April 2013

King County/Pierce County/  
Snohomish County

 COMCAST

WA-009



Channels in bold are HD

Limited Basic

- 2 NWCN
- 3 KWPX-TV ION
- 4 KOMO (ABC)
- 5 KING (NBC)
- 6 KONG
- 7 KIRO (CBS)
- 8 Discovery Channel
- 9 KCTS (PBS)
- 10 KZJO (JOE TV)
- 11 KSTW (CW)
- 12 KBTC (PBS)
- 12 KVO5 Me TV (Marysville/ Arlington)
- 13 KCPQ (FOX)
- 14 KBCB (IND)
- 15 KFFV (IND)
- 16 QVC
- 17 HSN
- 18 KWDK (Daystar)
- 19 Hallmark Channel
- 20 KTBW
- 21 Government Access
- 22 Government Access
- 23 TVW
- 24 C-SPAN
- 25 C-SPAN2
- 26 Education Access
- 27 UWTV
- 28 Education Access
- 29 KUNS (Univision)
- 72 KVO5 Me TV
- 75 KCTS Plus
- 75 Government Access (Kirkland)
- 76 Local Origination
- 78 The Weather Channel
- 79 Leased Access
- 81 Leased Access
- 87/726 **KUNS HD (Univision)**
- 88/738 KUNS (MundoFOX)
- 89 KFFV Weather
- 91 Azteca America
- 92 KFFV-AAT TV
- 93 KVO5 TheCoolTV
- 96 Jewelry TV
- 99 CBJT
- 102 **KBCB HD**
- 103 **KWPX HD (ION)**
- 104 **KOMO HD (ABC)**
- 105 **KING HD (NBC)**
- 106 **KONG HD**
- 107 **KIRO HD (CBS)**
- 108 **KBTC HD (Marysville/ Arlington)**

Family Tier

- Includes Limited Basic
- 35 Food Network
- 40 Nickelodeon
- 41 Disney Channel
- 45 HLN
- 68 HGTV
- 118 Sprout
- 121 The Hub
- 122 Disney XD
- 203 DIY
- 215 TeenNick
- 272 Science
- 273 National Geographic Channel
- 648 HLN HD**
- 673 National Geographic Channel HD**
- 674 HGTV HD**
- 675 Food Network HD**
- 679 Disney Channel HD**
- 679 Nickelodeon HD**
- 681 Disney XD HD**
- 696 Science HD**
- 720 Sprout HD**
- 721 The Hub HD**
- Includes Limited Basic
- 35 Food Network
- 37 History
- 41 Disney Channel
- 42 Cartoon Network
- 43 Animal Planet

- 44 CNN
- 48 Fox News Channel
- 49 truTV
- 51 Lifetime
- 52 A&E
- 56 BET
- 58 USA Network
- 60 Comedy Central
- 65 E!
- 67 AMC
- 74 TVGN
- 276 H2
- 655 Fox News Channel HD**
- 657 CNN HD**
- 667 Animal Planet HD**
- 668 Discovery Channel HD**
- 670 A&E HD**
- 671 History HD**
- 675 Food Network HD**
- 677 Disney Channel HD**
- 680 Cartoon Network HD**
- 689 BET HD**
- 697 AMC HD**
- 702 Hallmark Channel HD**
- 704 Comedy Central HD**
- 712 H2 HD**
- 717 TVGN HD**
- 901-946 Music Choice**

Digital Starter

- Includes Limited Basic
- 1 XFINITY On Demand
- 30 Root Sports Northwest
- 31 ESPN
- 32 ESPN2
- 33 Speed
- 34 NBC Sports Network
- 36 Travel Channel
- 38 TLC
- 39 ABC Family
- 40 Nickelodeon
- 45 HLN
- 46 CNBC
- 47 MSNBC
- 50 Oxygen
- 53 FX
- 54 TNT
- 55 TBS
- 57 Spike
- 59 Syfy
- 61 CW
- 62 VH1
- 63 MTV
- 64 MTV 2
- 66 Bravo
- 68 HGTV
- 70 Golf Channel

- 74 TVGN
- 118 Sprout
- 128 Bloomberg TV
- 136 G4
- 149 MoviePlex
- 150 C-SPAN3
- 162 BBC America
- 166 FEARnet
- 183 Style
- 271 Investigation Discovery
- 275 bio.
- 276 H2
- 430 PAC 12 Network (Regional)
- 482 gmc
- 500 Hallmark Movie Channel
- 504 LMN
- 620 Speed HD
- 623 ESPN HD
- 624 ESPN2 HD
- 625 Golf Channel HD
- 626 NBC Sports Network HD
- 627 Root Sports Northwest HD
- 628 PAC 12 Network HD (Regional)
- 646 Bloomberg TV HD
- 647 BBC America HD
- 648 HLN HD
- 650 Style HD
- 651 E! HD
- 652 Bravo HD
- 653 Lifetime HD
- 654 Travel Channel HD
- 655 Fox News Channel HD
- 657 CNN HD
- 658 CNBC HD
- 659 Spike HD
- 660 Universal HD
- 661 MSNBC HD
- 662 TNT HD
- 663 Velocity HD
- 664 TBS HD
- 665 FX HD
- 667 Animal Planet HD
- 668 Discovery Channel HD
- 669 TLC HD
- 670 A&E HD
- 671 History HD
- 672 USA Network HD
- 674 HGTV HD
- 675 Food Network HD
- 676 Syfy HD
- 677 Disney Channel HD
- 678 ABC Family HD
- 679 Nickelodeon HD
- 680 Cartoon Network HD
- 682 Oxygen HD
- 683 HSN HD
- 684 gmc HD
- 685 Palladia HD
- 686 CMT HD

Digital Preferred

- Includes Digital Starter
- 101 Weatherscan Local
- 120 Nick Jr.
- 121 The Hub
- 122 Disney XD
- 123 Disney Junior
- 124 BabyFirst Americas
- 125 Current TV
- 126 Nicktoons
- 127 Nick 2
- 130 Fox Business Network
- 131 BBC World News
- 139 LOGO
- 159 Nat Geo WILD
- 161 GSN
- 163 TV Land
- 179 CSN Northwest
- 201 Destination America
- 202 Ovation
- 203 DIY
- 204 Cooking Channel
- 205 RLTV
- 206 INSP
- 215 TeenNick
- 220 OWN
- 222 Discovery Fit & Health
- 231 halogen
- 232 BYUtv
- 233 EWTN
- 244 MYX
- 270 Smithsonian Channel
- 272 Science
- 273 National Geographic Channel
- 274 Military Channel
- 400 ESPN

- 401 FOX Soccer
- 402 ESPNews
- 406 Outdoor Channel
- 407 MLB Network
- 409 TV Games
- 412 CBS Sports Network
- 416 NBA TV
- 417 NFL Network
- 418 NFL Network HD**
- 419 NHL Network
- 471 GMT Pure Country
- 472 MTV HTS
- 473 VH1 Classic
- 474 VH1 Soul
- 475 MTV Jams
- 476 Fuse
- 480 Aspire
- 481 Centric
- 483 TV One
- 484 GAC
- 486 The Word
- 501 TCM
- 502 We tv
- 503 IFC
- 505 Sundance Channel
- 513 IndiePlex
- 514 RetroPlex
- 516 Encore Family
- 517 Encore HD**
- 518 Encore
- 519 Encore Love
- 521 Encore Suspense
- 523 Encore Westerns
- 527 Encore Drama
- 529 Encore Action
- 586 Flix
- 617 CSN Northwest HD**
- 618 FOX Soccer HD**
- 621 ESPN HD**
- 622 ESPN HD**
- 629 MLB Network HD**
- 630 NBA TV HD**
- 631 NHL Network HD**
- 633 CBS Sports Network HD**
- 635 Outdoor Channel HD**
- 649 We tv HD**
- 656 Fox Business Network HD**
- 666 Nat Geo Wild HD**
- 673 National Geographic Channel HD**
- 681 Disney XD HD**
- 690 Fuse HD**
- 691 TV One HD**
- 695 Destination America HD**
- 696 Science HD**
- 699 IFC HD**
- 700 MGM HD**
- 701 TCM HD**
- 707 AXS TV HD**
- 708 IndiePlex HD**

- 631 NHL Network HD
- 632 Big Ten Network HD
- 633 CBS Sports Network HD
- 634 Tennis Channel HD
- 635 Outdoor Channel HD
- 636 Sportsman Channel HD
- 637 NFL RedZone HD
- 785 beIN Sport en Español

**Premium Services**

- Starz
- 532 Starz HD
- 534 Starz
- 536 Starz Edge
- 537 Starz In Black
- 538 Starz Cinema
- 539 Starz Family
- 540 Starz Comedy

**HBO**

- 543 HBO2 HD
- 544 HBO Signature HD
- 546 HBO Latino HD
- 549 HBO HD
- 550 HBO East
- 551 HBO West
- 553 HBO2
- 555 HBO Signature
- 557 HBO Family
- 558 HBO Latino
- 559 HBO Comedy
- 560 HBO Zone

**Cinemax**

- 561 Cinemax West
- 562 Cinemax East
- 563 Cinemax HD
- 565 MoreMAX

**Showtime**

- 574 Showtime HD
- 576 Showtime
- 578 SHO 2
- 580 Showtime Showcase
- 582 Showtime Extreme
- 586 Flix

**The Movie Channel**

- 588 The Movie Channel HD
- 591 The Movie Channel
- 593 The Movie Channel Xtra
- Adult
- 853 Playboy TV

- 709 RetroPlex HD
- 714 Smithsonian Channel HD
- 715 Ovation HD
- 716 Cooking Channel HD
- 718 GSN HD
- 721 The Hub HD
- 727 Galavisión HD
- 728 Galavisión
- 729 UniMas
- 734 Telemundo
- 735 mun2
- 749 nuvoTV
- 770 HITN
- 780 tr3s

**Digital Preferred Plus**

Includes Digital Preferred, HBO and Starz

**Digital Premier**

Includes Digital Preferred Plus, Sports Entertainment Package, Cinemax and Showtime

**Sports Entertainment Package**

- 401 FOX Soccer
- 402 ESPNNews
- 403 ESPN Classic
- 404 Big Ten Network
- 406 Outdoor Channel
- 407 MLB Network
- 409 TV Games
- 410 NFL RedZone
- 411 Tennis Channel
- 412 CBS Sports Network
- 413 Fox College Sports Atlantic
- 414 Fox College Sports Central
- 415 Fox College Sports Pacific
- 416 NBA TV
- 417 NFL Network
- 418 NFL Network HD
- 419 NHL Network
- 427 Sportsman Channel
- 428 Outside TV
- 431 PAC-12 Network (National)
- 436 ESPN Goal Line/ Buzzer Beater
- 506 Fox Movie Channel
- 618 FOX Soccer HD
- 622 ESPNNews HD
- 629 MLB Network HD
- 630 NBA TV HD

241	TFC (Filipino)	201	Destination America	674	HGTV HD	703	Hallmark Movie Channel HD
242	GMA Pinoy TV (Filipino)	203	DIY	675	Destination America HD	708	IndiePlex HD
243	GMA Life	204	Cooking Channel	695	Science HD	709	RetroPlex HD
244	TV JAPAN (Japanese)	222	Discovery Fit & Health	712	H2 HD		
245	Zae TV	271	Investigation Discovery	716	Investigation Discovery HD		
246	Neo Cricket	272	Science				
247	NEO Cricket	273	National Geographic Channel				
248	SBTN (Vietnamese)	276	H2				
252	TV5 Monde (French)	646	Bloomberg TV HD				
255	RTN TV Russian	648	HLN HD				
257	KO-AM TV	654	Travel Channel HD				
<b>Pay-Per-View</b>		655	Fox News Channel HD				
420-425	ESPN Game Plan/Full Court	656	Fox Business Network HD				
440	Team HD	657	CNN HD				
441-450	NBA League Pass/MLS Direct Kick	661	MSNBC HD				
455	Game HD	666	Nat Geo Wild HD				
456	Game 2 HD	671	History HD				
457-470	NHL Center Ice/MLB Extra Innings	673	National Geographic Channel HD				
801-803	IN Demand PPV Events	674	HGTV HD				
804	IN Demand PPV Events HD	695	Destination America HD				
<b>MyTV Choice</b>		712	H2 HD				
35	Food Network	716	Investigation Discovery HD				
38	TLC						
43	Animal Planet						
49	truTV						
51	Lifetime						
52	A&E						
53	FX						
55	TBS						
56	BET						
60	Comedy Central						
65	E!						
67	AMC						
74	TVGN						
150	C-SPAN3						
163	TV Land						
232	8YUtv						
233	EWTN						
481	Centric						
486	The Word						
651	EI HD						
653	Lifetime HD						
664	TBS HD						
665	FX HD						
667	Animal Planet HD						
668	Discovery Channel HD						
669	TLC HD						
670	A&E HD						
675	Food Network HD						
30	Root Sports Northwest	276	H2	674	HGTV HD	703	Hallmark Movie Channel HD
31	ESPN	646	Bloomberg TV HD	695	Science HD	708	IndiePlex HD
32	ESPN2	648	HLN HD	712	H2 HD	709	RetroPlex HD
34	NBC Sports Network	654	Travel Channel HD	716	Investigation Discovery HD		
70	Golf Channel	655	Fox News Channel HD				
162	BBC America	656	Fox Business Network HD				
179	CSN Northwest	657	CNN HD				
274	Military Channel	661	MSNBC HD				
400	ESPN	666	Nat Geo Wild HD				
402	ESPNNews	671	History HD				
412	CBS Sports Network	673	National Geographic Channel HD				
617	GSN Northwest HD	674	HGTV HD				
621	ESPN HD	695	Destination America HD				
622	ESPNNews HD	712	H2 HD				
623	ESPN HD	716	Investigation Discovery HD				
624	ESPN2 HD						
625	Golf Channel HD						
626	NBC Sports Network HD						
627	Root Sports Northwest HD						
633	CBS Sports Network HD						
647	BBC America HD						
680	Cartoon Network HD						
<b>Entertainment &amp; Lifestyle</b>							
50	Oxygen						
54	TNT						
58	USA Network						
59	Syfy						
61	GMT						
62	VH1						
63	MTV						
64	MTV 2						
66	Bravo						
125	Current TV						
136	G4						
139	LOGO						
161	GSN						
183	Style						
202	Ovation						
220	OWN						
275	bio						
471	GMT Pure Country						
472	MTV Hits						
473	VH1 Classic						
474	VH1 Soul						
475	MTV Jams						
476	Fuse						
482	gmc						
483	TV One						
484	GAC						

**MultiLatino Packages**

**MultiLatino**

Available a la carte with subscription to Limited Basic

**Galavisión HD**

- 728 Galavisión
- 729 UniMas
- 730 History en Español
- 731 Discovery en Español
- 733 Canal 52MX
- 734 Telemundo
- 735 mun2
- 737 Mexican Network
- 739 TeleHit
- 740 Bandamax
- 741 De Pelicula
- 742 De Pelicula Clasico
- 743 Ritmoson Latino
- 744 CBTV Michoacan
- 745 Multimedios TV
- 746 WAPA America
- 747 TVE Internacional
- 749 nuvoTV
- 750 Discovery Familia
- 756 Cinelatino
- 757 Cine Mexicano
- 758 Gran Cine
- 759 Viendo Movies
- 760 CNN en Español
- 761 SUR TV
- 763 TeleFormula
- 769 Once TV Mexico
- 770 HITN
- 771 Centro Americana
- 772 EWTN en Español
- 773 La Familia Network
- 774 TBN Enlace
- 776 Pastores
- 777 HTV Musica
- 778 Video Rola
- 780 tr3s
- 781 ESPN Deportes
- 782 FOX Deportes
- 783 LAS
- 785 beIN Sport en Español
- 788 BabyFirst Americas en Español
- 789 Vme Kids

**MultiLatino Extra**

Includes Limited Basic, Digital Economy and MultiLatino

**MultiLatino Max**

Includes Limited Basic, Digital Economy, MultiLatino and the following channels:

**Root Sports Northwest**

- 31 ESPN
- 32 ESPN2
- 34 NBC Sports Network
- 38 TLC
- 40 Nickelodeon
- 54 TNT
- 55 TBS
- 57 Spike
- 59 Syfy
- 62 VH1
- 63 MTV
- 66 Bravo
- 70 Golf Channel
- 118 Sprout
- 162 BBC America
- 504 LMN
- 623 ESPN HD
- 624 ESPN2 HD
- 625 Golf Channel HD
- 626 NBC Sports Network HD
- 627 Root Sports Northwest HD
- 647 BBC America HD
- 652 Bravo HD
- 659 Spike HD
- 662 TNT HD
- 664 TBS HD
- 669 TLC HD
- 676 Syfy HD
- 679 Nickelodeon HD
- 687 VH1 HD
- 688 MTV HD
- 698 LMN HD
- 720 Sprout HD

**MultiLatino Ultra**

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

**MultiLatino Plus**

Includes Limited Basic and MultiLatino

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



**EXHIBIT 3**





**EXHIBIT 4**



1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

7925 JONES BRANCH DRIVE  
McLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

www.wileyrein.com

February 1, 2013

**VIA COURIER**

Mr. Steven Horvitz  
Davis Wright Tremaine LLP  
1919 Pennsylvania Avenue NW  
Suite 800  
Washington, DC 20006

Re: Frontier Communications Subscriber Figures for Various Communities in  
Washington

Dear Mr. Horvitz:

Pursuant to the terms of the Confidentiality and Non-Disclosure Agreement by and between Comcast Cable Communications, LLC and Frontier Communications Northwest Inc., dated February 1, 2013 (a copy of which is enclosed herewith), and in accordance with Section 76.907 of the FCC Rules, Frontier hereby submits the number of video subscribers that it serves in specifically identified Washington communities. As provided in the Confidentiality and Non-Disclosure Agreement, the enclosed information is highly confidential and proprietary to Frontier and shall not be disclosed except as expressly set forth in the Confidentiality and Non-Disclosure Agreement.

If you would like to discuss this further or have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brendon M. Pinkard".

Brendon M. Pinkard

*Counsel for Frontier Communications*

cc: Kevin Saville, Vice President & Associate General Counsel – Frontier

**CONFIDENTIAL AND PROPRIETARY  
NOT FOR DISCLOSURE EXCEPT AS SET FORTH IN  
FRONTIER/COMCAST CONFIDENTIALITY AGREEMENT  
(DATED 2/1/13)**

Cable Subscribers as of 12/31/12

OREGON

WASHINGTON

BRIER  
EDMONDS  
EVERETT

LYNWOOD

MILL CREEK  
MOUNTLAKE TERRACE  
MUKILTEO

WOODWAY

**EXHIBIT 5**



August 14, 2012  
Davis Wright Tremaine LLP  
1919 Pennsylvania Avenue, N.W.  
Suite 800  
Washington, DC 20006

To Whom It May Concern:

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

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

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

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

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

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

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

Pinna Gallant  
Senior Product Manager  
SNL Kagan

**EXHIBIT 6**

**SBCA ECTR Summary Pages**

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

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



Provided by  
Satellite Broadcasting and Communications Association

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Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: May 1, 2013

ZIP Codes

DTH Count

---

Requested total for Brier, WA

---

Data is current through 3/31/2013

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

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

**ECTR – Effective Competition Tracking Report**



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: May 1, 2013

ZIP Codes

DTH Count

Requested total for Edmonds, WA
---------------------------------

Data is current through 3/31/2013

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

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

**ECTR – Effective Competition Tracking Report**



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: May 1, 2013

ZIP Codes

DTH Count

---

Requested total for Everett, WA

---

Data is current through 3/31/2013

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

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

**ECTR – Effective Competition Tracking Report**



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: May 1, 2013

ZIP Codes

DTH Count

Requested total for Lynnwood, WA
----------------------------------

Data is current through 3/31/2013

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

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

**ECTR – Effective Competition Tracking Report**



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: May 1, 2013

ZIP Codes

DTH Count

Requested total for Mill Creek, WA
------------------------------------

Data is current through 3/31/2013

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

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

**ECTR – Effective Competition Tracking Report**



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: May 1, 2013

ZIP Codes

DTH Count

Requested total for Mountlake Terrace, WA
-------------------------------------------

Data is current through 3/31/2013

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

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

**ECTR – Effective Competition Tracking Report**



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: May 1, 2013

ZIP Codes

DTH Count

Requested total for Mukilteo, WA
----------------------------------

Data is current through 3/31/2013

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

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

**ECTR – Effective Competition Tracking Report**



Provided by  
Satellite Broadcasting and Communications Association

---

Pursuant to Section 76.907(c) of the FCC Rules, and your effective competition tracking request dated March 14, 2013 please find the following Direct-to-Home (DTH) satellite subscriber numbers per zip code (and/or zip+4 where necessary). The provision and use of this Effective Competition Tracking Report is governed by and subject to the terms and conditions of the Agreement for Provision and Use of Confidential Data, between your company and SBCA.

Report Date: May 1, 2013

ZIP Codes

DTH Count

Requested total for Woodway, WA
---------------------------------

Data is current through 3/31/2013

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

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

**EXHIBIT 7**

1 Advanced Search 2 Table Viewer

Result 1 of 1

VIEW ALL AS PDF

H1

**OCCUPANCY STATUS**

Universe: Housing units

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

[BACK TO ADVANCED SEARCH](#)

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

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

	Brier city, Washington	Edmonds city, Washington	Everett city, Washington	Lynnwood city, Washington	Mill Creek city, Washington	Mountlake Terrace city, Washington	Mukilteo city, Washington	Woodway city, Washington
Total:	2,220	18,378	44,609	14,939	7,923	8,602	8,547	466
Occupied	2,165	17,381	41,312	14,107	7,551	8,192	8,057	448
Vacant	55	997	3,297	832	372	410	490	18

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

**EXHIBIT 8**

**REDACTED - FOR PUBLIC INSPECTION**

<b>Community</b>	<b>State</b>	<b>Total DBS Subscribers</b>	<b>Frontier Subscribers</b>	<b>2010 Census Occupied Housing Units</b>	<b>% of Competing MVPD Penetration In Franchise Area Column C+D / Column E</b>
BRIER	WA			2,165	22.86%
EDMONDS	WA			17,381	16.21%
EVERETT	WA			41,312	15.98%
LYNNWOOD	WA			14,107	17.88%
MILL CREEK	WA			7,551	16.81%
MOUNTLAKE TERRACE	WA			8,192	17.88%
MUKILTEO	WA			8,057	15.24%
WOODWAY	WA			448	19.87%

CERTIFICATE OF SERVICE

I, Deborah D. Williams, do hereby certify on this 19<sup>th</sup> day of July, 2013 that a true and correct copy of the foregoing "Petition for Special Relief" has been sent via U.S. mail, postage prepaid to the following:

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

Ms. Paula Swisher  
Clerk-Treasurer  
City of Brier  
2901 228<sup>th</sup> St SW  
Brier, WA 98036

Ms. Sandra Chase  
City Clerk  
City of Edmonds  
121 5<sup>th</sup> Ave N  
Edmonds, WA 98020

Mr. Ned Johnson  
City Attorney  
City of Everett  
2930 Wetmore Ave, Suite 10-C  
Everett, WA 98201

Mr. Lorenzo Hines  
Finance Director  
City of Lynnwood  
PO Box 5008  
Lynnwood, WA 98046-5008

Ms. Kelly Chelin  
City Clerk  
City of Mill Creek  
15728 Main Street  
Mill Creek, WA 98012-1227

Mr. Scott Hugill  
Administrative Services Director  
6100 219<sup>th</sup>, Suite 200  
Mountlake Terrace, WA 98043

Ms. Christina Boughman  
City Clerk  
City of Mukilteo  
11930 Cyrus Way  
Mukilteo, WA 98275

Ms. Lorraine Taylor  
Clerk-Treasurer  
City of Woodway  
23920 113<sup>th</sup> Place W  
Woodway, WA 98020

  
Deborah D. Williams