MICHAEL COUZENS
ATTORNEY AT LAW
6536 TELEGRAPH AVENUE, SUITE B201
OAKLAND, CALIFORNIA 94609
TELEPHONE (510) 658-7654
FAX NO. (510) 654-6741

ADMITTED IN
CALIFORNIA AND IN THE
DISTRICT OF COLUMBIA

MAILING ADDRESS
POST OFFICE BOX 3642
OAKLAND, CALIFORNIA 94609
e-mail cuz@lptv.tv
www.lptv.tv

November 17, 2008

To: lptv@ntia.doc.gov

LPTV Program
U.S. Department of Commerce
Room 4812
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Re: Low Power Television and
Translator [Digital] Upgrade Program

Dear NTIA Staff:

Thank you for the opportunity to comment on your plans for an LPTV and TV translator digital upgrade program. I was privileged to participate in your public meeting in Las Vegas on October 28, and now offer the following by way of follow-up. You are to be commended for your desire to get this program off on the right foot, and your willingness to hear ideas from all sides.

I am communications attorney in sole practice in Oakland, California. I have been involved in Low Power Television since 1978, when I was an attorney-advisor on the FCC staff and chaired the low power television inquiry staff. My clients include a few urban LPTV licensees and a few rural TV translator operators. Currently I am a board member of the National Translator Association. Here I comment only in my own behalf, but hope to do so as a long-standing friend of urban LPTV, of rural TV translators, and of the key audiences they both serve.

These are the paramount issues I see.

First, time is of the essence. NTIA is not at the stage of NPRM, and its Notice in the Federal Register, 73 F Reg.59586, October 9, 2008, seeks informal comment only. Given the target date of the DTV transition on February 17, 2009, an NPRM should be issued as soon as possible to start the clock on adoption of final rules. A prompt notice that is not exhaustive and that may or may not contain the best resolution of every issue still is far preferable to a comprehensive notice that may come too late for some of the critical needs.

Second, so far as possible, the proposals should adhere to the governing law (Pub. L. 110-295, codified as 47 U.S.C. Sec. 3009(j)(8)(E)). The October 9, 2008, public meeting notice does this well. In the opening days of a new administration and Congress in January, 2009, there will not be time to make substantive improvements to the statute. And while everyone recognizes that

the statute is cumbersome and flawed, significant departures from its intent could invite court challenges, which would jeopardize the purpose of rapid assistance.

Third and finally, administrative convenience and efficiency are important goals in every government grant program. Here we should add to the list: simplicity. Intricate formulas and cumbersome application and reporting requirements would negate prompt and wide implementation, no matter how lofty the intentions behind any ornate rule. On the application side, the minimal point of entry should be a one-page form. On the processing side, staff review where possible should be reduced to mechanistic go/no-go tests.

With these precepts in mind I proceed to discuss a few key questions in eligibility.

Applications -- Construction Permits -- Licenses. The station status issues should not be difficult. The statute defines an eligible station to include Class A, LPTV, TV translators and TV boosters. The statute defines the awardee as an entity that "is broadcasting." But a construction permit should be treated in the same manner as a license, consistent with established FCC practice. A permit holder has authority to commence broadecasting at any time. Mere applicants would not qualify. By statute the station must be "broadcasting exclusively in analog format."

A cut-off date should be selected to coincide with the date of the Statute (2/8/006), some later date being not the preferred course. The important point here is that the date not be a future date, because that could discourage operators from upgrading just to assure eligibility. The earliest date for eligibility has merit because it would reward early adopters who made an early DTV transition at their own expense. There is no equitable reason to exclude them and reimburse late-comers. Those operating a digital companion channel could be treated as eligible or not, depending on the date that their companion channel was initially authorized, as compared with the eligibility cut-off date.

Location. Location eligibility is trickier, because the statute as written may be difficult or impossible to follow literally. It makes eligible those stations located in "eligible rural communities" as that is defined in 7 U.S.C. Section 950bb, which deals with access to broadband in rural areas:

> (b)(2) The term "eligible rural community" means any area of the United States that is not contained in an incorporated city or town with a population in excess of 20,000 inhabitants.

In the case of broadband facilities, the municipal boundary is important (1) because public rights of way and easements may be involved, (2) because the facilities usually are located within the community near the users, and (3) because municipalities are themselves eligible for assistance. By contrast, translators typically are located not inside a community boundary, but on a high tower or promontory looking directionally across or down to the intended audience. Of course, broadcast signals pay no attention to municipal boundaries and, for example, a community of 25,000 should be no less worthy of assistance than two contiguous incorporated villages of 15,000 each.

The community of license specified in an LPTV station application or license has no legal or practical significance. No requirements are attendant on specifying any particular community, and the specification can be changed by minor amendment. So use of that community for eligibility would be arbitrary. Further, requiring an applicant to match coverage and population data with municipal boundaries would complicate the application process, both for applicants and for the processing line.

There is precedent for implementing a statute that says "communities" by focusing on population differences. This honors the statutory intent as closely as possible, while making the result administratively workable. The Commission is mandated by 47 U.S.C. Sec. 307(b) to make a distribution of service among "communities" that is fair, efficient and equitable. In 2000 it adopted a new standard for processing conflicting non-commercial applications. For mutually exclusive applications that specify different communities of license, the Commission gave a dispositive Section 307(b) preference to the applicant providing a certain threshold of first service, or first and second service, without regard to whether any of that service was in the specified community, *Reexamination of Comparative Standards for Noncommercial Educational Applicants*, Report and Order, 15 FCC Rcd 7386, 7397-98 (2000) ("*NCE Order*"). The result is to interpret the law in a matter that is easy to apply in practice -- exactly what is needed here.

During the 2000 low Power Television filing window, the Commission imposed a geographic restriction defined as, no filing for a TV transmitter location within within 121 km (75 miles) of the reference coordinates of cities as listed in the Notice. The city list appears to have consisted of all Designated Market Areas as defined by Nielsen Media Research, some 210 markets. In the case of hyphenated markets (San Francisco - Oakland - San Jose) each named city was identified, with coordinates, creating the 75-mile bar to applications. Applying this standard for Commerce Dept. rural assistance would direct the financial assistance to the same facilities the Commission encouraged during that rural window. In the 1999-2000 estimate, all but one Nielsen DMA (No. 210, Glendive, Montana, 3,900 TV Households) appear to have had populations well in excess of 20,000, Television and Cable Fact Book 2000, vol 1, p. A-4.

A distance standard like this, or some other mileage separation from known points, would be easy to calculate, and easy to check upon filing. The FCC's Audio Division provides a handy utility for converting two sets of geodetic coordinates into a mileage distance:

http://www.fcc.gov/mb/audio/bickel/distance.html

In some cases a small and deserving service area will be situated inside the mileage distance, but not have effective service from the primary stations in the DMA because of terrain. In the 2000 window, the Commission invited and accepted waivers based on "complete" terrain shielding from the primary market station. For purposes of this program, applicants should be invited to demonstrate terrain blockage, where they can show their existing service being provided (within their primary service contour) to a area of less than 20,000 in population.

The statute also provides, "Priority reimbursement shall be given to stations "that serve rural areas of less than 10,000 in population." This provision offers strong support for choosing a system that emphasizes population alone and does not employ municipal boundaries. It might be applied by stating that applicants at the required distance need not, but may supply a showing of population less than 10,000 in the coverage area, and be accorded some kind of expedited processing, or assurance that they will be funded ahead of some other categories of assistance. Inside the mileage distance, a waiver request might serve the dual purpose for the applicant of showing a population in the coverage area, below 20,000 and below 10,000 as well.

3. Nature of the Entity. The statute also accords priority (parallel to the priority below 10,000 population) to stations in which the license is held by "a non-profit corporation." By its terms this does not exclude assistance to for-profit entities, and this seems appropriate where a population limitation steers all grants to smaller communities having greatest need. The priority that is afforded should not make a distinction between non-profit corporations and other public benefit institutions, such as school districts, colleges and universities, tax districts, and other instrumentalities of state and local government. Consistently with PTFP's significant experience, there is no rational basis to exclude any of these entities while including others. All are functionally non-profit.

The remaining question is, what priority or preference should attach to such non-profits? A possible approach would be to grant initial eligibility for a small grant, based on a minimal one-page application, to a qualified applicant proposing the replacement or modification of the basic transmission plan with digital transmission equipment. Multiple licenses would be eligible for multiple grants. Thereafter, more ambitious -- and expensive -- proposals could be entertained, as budget permits, based on a detailed plan and possibly including ATSC terrestrial relays and site changes to protect digital coverage.

Once again I thank you for this open process, and wish you well in the difficult task ahead.

Respectfully submitted,

Michael Couzens

Attachment: 15 FCC Rcd 10854, DA 00-1383, rel. June 23, 2000.

PUBLIC NOTICE

FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET, S.W.
WASHINGTON, D.C. 20554

News Media Information: (202) 418-0500
Fax-On-Demand: (202) 418-2830
Internet: http://www.fcc.gov
ftp.fcc.gov

CORRECTED

DA 00-1383
June 23, 2000

Notice and Filing Requirements Regarding July 31 through August 4, 2000 Limited Low Power Television/Television Translator/Class A Television Auction Filing Window

Report No. AUC-00-81-A (Auction No. 81)

The Mass Media Bureau (MMB) and the Wireless Telecommunications Bureau (WTB) announce the scheduling of an auction filing window for certain low power television, television translator, and Class A television broadcast stations. Commencing July 31, 2000, and continuing to and including August 4, 2000, the Commission will permit the filing of applications for new construction permits and for major changes in existing facilities for low power television and television translator stations (LPTV). The Commission also will permit in this auction window the filing of applications for major changes in the facilities of authorized Class A television stations; that is, stations for which a Class A TV construction permit or license has been issued.[1] Mutually exclusive proposals will be considered under the Commission's competitive bidding procedures.[2]

[1] On March 28, 2000, the Commission established a Class A Television Service to implement the Community Broadcasters Protection Act of 1999 (CPBA). *See Report and Order* in MM Docket No. 00-10, 15 FCC Rcd 6355 (2000). Pursuant to the CPBA, the Class A TV service provides a measure of "primary" regulatory status to qualifying low power television stations, including some of the interference protections afforded to full-service television stations. Applications for **initial** Class A TV authority are not subject to this window and may be filed at any time within the six-month period beginning on the date the Class A *Report and Order* became effective, namely June 9, 2000.

[2] *See Implementation of Section 309(j) of the Communications Act – Competitive Bidding for Commercial Broadcast and Instructional Fixed Service Licenses, First Report and Order*, MM Docket No. 97-234, 13 FCC Rcd 15920 (1998) ("*Broadcast First Report and Order*").

Major Facilities Changes: A major change for LPTV and Class A TV stations is a change in frequency (output channel), except a change in offset carrier frequency. For this filing window, a major change is also any facilities change(s) that would increase the distance in any directional to a station's protected signal contour.[3] A channel change application filed by a Class A TV licensee, which is necessitated by channel displacement, is also considered a major change application. Such Class A TV displacement applications, which can be filed on a first-come, first-served basis and are not subject to mutually exclusive Class A TV, LPTV, and TV translator non-displacement applications,[4] can also be submitted during this auction filing window.

Geographic Restrictions: This auction filing window is subject to geographic restrictions on the filing of applications for new station construction permits **and** for major changes in existing facilities. The Commission will permit applications that specify transmitting antenna site coordinates (geographic latitude and longitude) located more than 121 kilometers (75 miles) from the reference coordinates of the cities listed in Attachment A to this Public Notice. These restrictions are necessitated by the Commission's implementation of the digital television (DTV) service and by the large number of LPTV stations already authorized in and around these cities. By this window, the Commission seeks to provide additional opportunities for low power TV and TV translator service in those rural areas of the country where there is relatively less free over-the-air television service. However, geographic restrictions are necessary to minimize the extent to which LPTV or TV translator service is disrupted by existing or future DTV station operations.[5]

Notwithstanding the above, the Commission will consider requests for waiver of the geographic restrictions based on terrain shielding. Such waivers will be granted where applicants demonstrate that their proposed facilities are completely shielded by terrain barriers

---

[3] The Class A TV *Report and Order* provides a more inclusive definition of minor facilities changes for Class A TV, low power TV and TV translator stations; for example, increases in station power will be considered minor changes. However, the more inclusive minor change provision will not take effect until October 1, 2000.

[4] *See* Class A *Report and Order*, 15 FCC Rcd at 6400-01.

[5] Low power TV and TV translator stations and, to a lesser extent, Class A TV stations have a secondary status with regard to the introduction of DTV service. Since June 1, 1998, the Commission has received more than 1800 "displacement relief" applications seeking replacement channels and/or other facilities changes to avoid DTV conflicts or to vacate the use of channels 60-69, which have been reallocated for other uses and must be surrendered by the end of the DTV transition period. More than 450 DTV facilities have been authorized and approximately 130 stations are now operating. The Commission's DTV buildout schedule requires that all commercial stations be operational by May 1, 2002; noncommercial DTV stations must be operational by May 1, 2003. Additionally, hundreds of LPTV and TV translator stations will be required to seek replacement channels below channel 52 when channels 52-69, are no longer available for their use.

from the applicable television market cities listed in Attachment A. Through this extension of the Commission's policy on terrain shielding (*See Policy Statement*, 3 FCC Rcd 2664, *reconsideration granted in part*, 3 FCC Rcd 7105 (1988)), opportunities will not be foreclosed for additional low power TV and TV translator service in locales that are completely insulated from TV signals emanating from the applicable TV market cities due to substantial terrain obstructions; for example, large mountain ranges in the western states. Requests for terrain-related waivers, which will be filed subsequently at the direction of the Commission, must be supported by an appropriate number of profiles showing the terrain between the proposed community of service and the applicable TV market cities, and indicating that the signals of full-service stations in these cities cannot be directly received in the proposed community. Guidance for preparing terrain profiles is given in the Commission's terrain *Policy Statement*. Alternatively, applicants may demonstrate terrain shielding using the Longley-Rice terrain dependent signal propagation prediction methods.

Participation: Those wishing to participate in the auction ***must***:

- File electronically a short form application (FCC Form 175) by 5:30 p.m. Eastern Standard Time, August 4, 2000. See Attachments B, C, and D for more information regarding the completion of Form 175, including information on bidding credits and designated entities.

- For LPTV and Television Translator proposals: File **a paper copy**, in triplicate, with the Secretary of the Commission the following portions of **FCC Form 346** (June 2000 version): Section I, the Tech Box portion of Section III and Question 12 of Section III. For Class A Television proposals: File **a paper copy**, in triplicate, with the Secretary of the Commission the following portions of **FCC Form 301-CA** (June 2000 version): Section I and the Tech Box portion of Section III. **Neither older versions nor electronically filed versions of FCC Form 346 or FCC Form 301-CA will be accepted.** A printed copy of Form 175 should be attached to the Form 346 or 301-CA submission. The Form 346 or 301-CA, with the attached Form 175, is due to the Commission in hard copy by 5:30 p.m. Eastern Standard Time, August 4, 2000. No fee is required. See Attachment B for more information regarding the completion of Forms 346 and 301-CA.

- Comply with all provisions outlined in this Public Notice and applicable rules of the Commission.

No consideration will be given any proposal for which the required engineering information is not on file by the close of the window.

For additional information, contact Shaun Maher (legal) or Hossein Hashemzadeh (technical), Video Services Division, Mass Media Bureau at (202) 418-1600.

List of Attachments:

Attachment A:	Geographic Restrictions
Attachment B:	Pre-Auction Procedures
Attachment C:	Guidelines for Completion of FCC Form 175 and Exhibits
Attachment D:	Eligibility for New Entrant Bidding Credit; Ownership Disclosure Requirements; Consortia and Joint Bidding Arrangements
Attachment E:	Electronic Filing and Review of the FCC Form 175
Attachment F:	Accessing the FCC Network Using Windows 95/98

ATTACHMENT A

Except as provided in this Public Notice, applications filed in this window may not propose new or modified facilities located within 121 kilometers (75 miles) of the reference coordinates listed below for the following cities.

Source of cities: January 1, 2000 Nielsen Media Research Estimates.
Source of coordinates: Section 76.53 of FCC Rules or, as indicated by **, the U.S. Geological Survey.

New York, NY	40-45-06	073-59-39
Los Angeles, CA	34-03-15	118-14-28
Chicago, IL	41-52-28	087-38-22
Philadelphia, PA	39-56-58	075-09-21
San Francisco, CA	37-46-39	122-24-40 *
Oakland, CA	37-48-03	122-15-54 *
San Jose, CA	37-20-16	121-53-24 *
Boston, MA	42-21-24	071-03-25
Dallas, TX	32-47-09	096-47-37 *
Fort Worth, TX	32-44-55	097-19-44 *
Washington, DC	38-53-51	077-00-33
Detroit, MI	42-19-48	083-02-57
Atlanta, GA	33-45-10	084-23-37
Houston, TX	29-45-26	095-21-37
Seattle, WA	47-36-32	122-20-12 *
Tacoma, WA	47-14-59	122-26-15 *
Tampa, FL	27-56-58	082-27-26 *
St. Petersburg, FL	27-46-18	082-38-16 *
Minneapolis, MN	44-58-57	093-15-43 *
St. Paul, MN	44-56-50	093-05-11 *
Cleveland, OH	41-29-51	081-41-50
Miami, FL	25-46-37	080-11-32 *
Fort Lauderdale, FL	26-07-11	080-08-34 *
Phoenix, AZ	33-27-12	112-04-28
Denver, CO	39-44-58	104-59-22
Sacramento, CA	38-34-57	121-29-41 *
Stockton, CA	37-57-30	121-17-16 *
Modesto, CA	37-38-26	120-59-44 *
Pittsburgh, PA	40-26-19	080-00-00
St. Louis, MO	38-37-45	090-12-22
Orlando, FL	28-32-42	081-22-38 *
Daytona Beach, FL	29-12-44	081-01-10 *
Melbourne, FL	28-04-41	080-36-29 *
Portland, OR	45-31-06	122-40-35
Baltimore, MD	39-17-26	076-36-45
San Diego, CA	32-42-53	117-09-21
Indianapolis, IN	39-46-07	086-09-46
Hartford, CT	41-46-12	072-40-49 *

New Haven, CT	41-18-25	072-55-30 *	
Charlotte, NC	35-13-44	080-50-45	
Raleigh, NC	35-46-38	078-38-21 *	
Durham, NC	35-59-48	078-54-00 *	
Nashville, TN	36-09-33	086-46-55	
Kansas City, MO	39-04-56	094-35-20	
Cincinnati, OH	39-06-07	084-30-35	
Milwaukee, WI	43-02-19	087-54-15	
Columbus, OH	39-57-47	083-00-17	
Greenville, SC	34-50-50	082-24-01 *	
Spartanburg, SC	34-57-03	081-56-06 *	
Asheville, NC	35-35-42	082-33-26 *	
Anderson, SC	34-30-06	082-38-54 *	
Salt Lake City, UT	40-45-23	111-53-26	
San Antonio, TX	29-25-37	098-29-06	
Grand Rapids, MI	42-58-03	085-40-13 *	
Kalamazoo, MI	42-17-29	085-35-14 *	
Battle Creek, MI	42-18-58	085-10-48 *	
Birmingham, AL	33-31-01	086-48-36	
Memphis, TN	35-08-46	090-03-13	
New Orleans, LA	29-56-53	090-04-10	
Norfolk, VA	36-51-10	076-17-21 *	
Portsmouth, VA	36-50-12	076-17-54 *	
Newport News, VA	36-58-43	076-25-42 *	**
West Palm Beach, FL	26-42-36	080-03-05 *	
Ft. Pierce, FL	27-26-48	080-19-38 *	
Buffalo, NY	42-52-52	078-52-21	
Oklahoma City, OK	35-28-26	097-31-04	
Harrisburg, PA	40-15-43	076-52-59 *	
Lancaster, PA	40-02-25	076-18-29 *	
Lebanon, PA	40-20-27	076-24-42 *	**
York, PA	39-57-35	076-43-36 *	
Greensboro, NC	36-04-17	079-47-25 *	
High Point, NC	35-57-14	080-00-15 *	
Winston-Salem, NC	36-05-52	080-14-42 *	
Louisville, KY	38-14-47	085-45-49	
Albuquerque, NM	35-05-01	106-39-05 *	
Santa Fe, NM	35-41-13	105-56-41 *	**
Providence, RI	41-49-32	071-24-41 *	
New Bedford, MA	41-38-13	070-55-41 *	
Wilkes Barre, PA	41-14-32	075-53-17 *	
Scranton, PA	41-24-32	075-39-46 *	
Jacksonville, FL	30-19-44	081-39-42 *	
Brunswick, GA	31-08-59	081-29-30 *	**
Las Vegas, NV	36-10-20	115-08-37	
Fresno, CA	36-44-12	119-47-11 *	
Visalia, CA	36-19-46	119-17-30 *	
Albany, NY	42-39-01	073-45-01 *	
Schenectady, NY	42-48-52	073-56-24 *	

Troy, NY	42-43-42	073-41-32 *	**
Dayton, OH	39-45-32	084-11-43	
Little Rock, AR	34-44-42	092-16-37 *	
Pine Bluff, AR	34-13-42	092-00-11 *	**
Tulsa, OK	36-09-12	095-59-34	
Charleston, WV	38-21-01	081-37-52 *	
Huntington, WV	38-25-12	082-26-33 *	
Richmond, VA	37-32-15	077-26-09 *	
Petersburg, VA	37-13-40	077-24-15 *	
Austin, TX	30-16-09	097-44-37	
Mobile, AL	30-41-36	088-02-33 *	
Pensacola, FL	30-24-51	087-12-56 *	
Knoxville, TN	35-57-39	083-55-07	
Flint, MI	43-00-50	083-41-33	
Saginaw, MI	43-25-52	083-56-05 *	
Bay City, MI	43-36-04	083-53-15 *	
Wichita, KS	37-41-30	097-20-16 *	
Hutchinson, KS	38-03-11	097-55-20 *	
Lexington, KY	38-02-50	084-29-46	
Toledo, OH	41-39-14	083-32-39	
Roanoke, VA	37-16-13	079-56-44 *	
Lynchburg, VA	37-24-51	079-08-37 *	
Green Bay, WI	44-30-48	088-00-50 *	
Appleton, WI	44-15-43	088-24-55 *	**
Des Moines, IA	41-35-14	093-37-00 *	
Ames, IA	42-01-36	093-36-44 *	
Honolulu, HI	21-18-36	157-51-48	
Tucson, AZ	32-13-15	110-58-08	
Omaha, NE	41-15-42	095-56-14	
Paducah, KY	37-05-13	088-35-56 *	
Cape Giradeau, MO	37-18-29	089-31-29 *	
Harrisburg, IL	37-44-20	088-32-25 *	
Mount Vernon, IL	38-18-29	088-54-26 *	
Shreveport, LA	32-30-46	093-44-58	
Syracuse, NY	43-03-04	076-09-14	
Rochester, NY	43-09-41	077-36-21	
Spokane, WA	47-39-32	117-25-33	
Springfield, MO	37-13-03	093-17-32	
Portland, ME	43-39-33	070-15-19 *	
Auburn, ME	44-05-52	070-13-54 *	**
Fort Myers, FL	26-38-42	081-52-06 *	
Naples, FL	26-08-30	081-47-42 *	**
Huntsville, AL	34-44-18	086-35-19 *	
Decatur, AL	34-36-35	086-58-45 *	
Champaign, IL	40-07-05	088-14-48 *	
Springfield, IL	39-47-58	089-38-51 *	
Decatur, IL	39-50-37	088-57-11 *	
Chattanooga, TN	35-02-41	085-18-32	
Madison, WI	43-04-23	089-22-55	

Columbia, SC	34-00-02	081-02-00	
South Bend, IN	41-40-33	086-15-01 *	
Elkhart, IN	41-40-56	085-58-15 *	
Davenport, IA	41-31-24	090-34-21 *	
Rock Island, IL	41-30-40	090-34-24 *	
Moline, IL	41-30-31	090-30-49 *	
Jackson, MS	32-17-56	090-11-06	
Cedar Rapids, IA	41-58-48	091-39-48 *	
Waterloo, IA	42-29-40	092-20-20 *	
Dubuque, IA	42-29-55	090-40-08 *	
Burlington, VT	44-28-34	073-12-46 *	
Plattsburgh, NY	44-42-03	073-27-07 *	
Bristol, VA	36-35-48	082-11-04 *	
Kingsport, TN	36-32-57	082-33-44 *	
Johnson City, TN	36-19-04	082-20-56 *	
Colorado Springs, CO	38-50-07	104-49-16 *	
Pueblo, CO	38-16-17	104-36-33 *	
Waco, TX	31-33-12	097-08-00 *	
Temple, TX	31-06-02	097-20-22 *	
Bryan, TX	30-38-48	096-21-31 *	
Johnstown, PA	40-19-35	078-55-03 *	
Altoona, PA	40-30-55	078-24-03 *	
El Paso, TX	31-45-36	106-29-11	
Baton Rouge, LA	30-26-58	091-11-00	
Evansville, IN	37-58-20	087-34-21	
Youngstown, OH	41-05-57	080-39-02	
Savannah, GA	32-04-42	081-05-37	
Lincoln, NE	40-48-59	096-42-15 *	
Hastings, NE	40-35-21	098-23-20 *	
Kearney, NE	40-41-58	099-04-53 *	
Harlingen, TX	26-11-29	097-41-35 *	
Weslaco, TX	26-09-24	097-59-33 *	
Brownsville, TX	25-54-05	097-29-50 *	**
McAllen, TX	26-11-29	097-41-35 *	**
Fort Wayne, IN	41-04-21	085-08-26	
Charleston, SC	32-46-35	079-55-53	
Springfield, MA	42-06-21	072-35-32 *	
Holyoke, MA	42-12-15	072-37-00 *	**
Greenville, NC	35-36-49	077-22-22 *	
New Bern, NC	35-06-33	077-02-23 *	
Washington, NC	35-32-35	077-03-16 *	
Lansing, MI	42-44-01	084-33-15	
Tyler, TX	32-21-21	095-17-52 *	
Longview, TX	32-28-24	094-43-45 *	
Tallahassee, FL	30-26-30	084-16-50 *	
Thomasville, GA	30-50-25	083-58-59 *	
Peoria, IL	40-41-42	089-35-33 *	
Bloomington, IL	40-28-58	088-59-32 *	
Reno, NV	39-31-27	119-48-40	

Monterey, CA	36-35-44	121-53-39 *	
Salinas, CA	36-40-24	121-39-25 *	
Santa Barbara, CA	34-25-18	119-41-55 *	
Santa Maria, CA	34-57-02	120-26-10 *	
San Luis Obispo, CA	35-16-49	120-39-34 *	
Sioux Falls, SD	43-32-35	096-43-35	
Augusta, GA	33-28-20	081-58-00	
Florence, SC	34-11-49	079-46-06 *	
Myrtle Beach, SC	33-41-20	078-53-13 *	**
Montgomery, AL	32-22-33	086-18-31	
Fort Smith, AR	35-23-10	094-25-36 *	
Fayetteville, AR	36-03-41	094-09-38 *	**
Springdale, AR	36-11-12	094-07-43 *	**
Rogers, AR	36-19-55	094-07-06 *	**
Fargo, ND	46-52-30	096-47-18 *	
Valley City, ND	46-55-31	098-00-04 *	
Traverse City, MI	44-45-47	085-37-25 *	
Cadillac, MI	44-15-10	085-23-52 *	
Macon, GA	32-50-12	083-37-36	
Eugene, OR	44-03-16	123-05-30	
Lafayette, LA	30-13-24	092-01-06	
Yakima, WA	46-36-09	120-30-39 *	
Pasco, WA	46-13-50	119-05-27 *	
Richland, WA	46-16-36	119-16-21 *	
Kennewick, WA	46-12-28	119-08-32 *	
Boise, ID	43-37-07	116-11-58	

*: City is part of a hyphenated market.