Statement of
Earle A. MacKenzie
Executive Vice President and Chief Operating Officer at Shenandoah Telecommunications Company
Board Member of the American Cable Association

Before the
Subcommittee on Courts, Intellectual Property and the Internet
Committee on the Judiciary
U.S. House of Representatives

Hearing on
"Satellite Television Laws in Title 17"
September 10, 2013

My name is Earle A. MacKenzie, and I am the Executive Vice President and Chief Operating Officer of Shenandoah Telecommunications Company, better known by our brand name, Shentel. The company was started in 1902 by a group of farmers who wanted to bring telephone service to Shenandoah County, Virginia. Today, we offer a broad range of advanced broadband, digital video, wireline and wireless services to residential and business customers in western and southern Virginia, West Virginia, western Maryland and southern Pennsylvania. We are a publicly traded company (SHEN) headquartered in Edinburg, Virginia, a town of 1,100 residents, which is typical of many communities we serve. Our company has over 500,000 customers served by 700 employees. Our cable operations, with 75,000 customers in Virginia, West Virginia and Maryland, pass 185,000 homes and businesses in 31 counties with 110 communities.

The cable markets we serve vary from small towns to rural areas. We, like other members of the American Cable Association, differ from large urban providers in that we pass fewer homes per mile with outside plant. This increases the cost to construct and upgrade our systems and to operate them on an ongoing basis. However, despite the disproportionate costs, smaller operators still believe in providing smaller markets with the same service as large ones. Shentel is a good example. Our company invests to ensure that the rural communities we serve will have access to the same level of services as those found anywhere in the US. For example, since 2009, the shareholders of Shentel have invested over $370 million dollars in our wireless and wireline networks. $112 million has been spent upgrading cable networks we purchased in 2008 and 2010. This investment of over $650 per home passed has allowed us to bring high definition television, digital voice and up to 50 Mbps of high speed Internet to communities that previously had only dial up. Another example of our commitment to rural communities is our decision to rebuild the cable network to 10,000 homes in McDowell County, located in southern West Virginia using fiber-to-the-home technology, similar to Verizon FIOS.

It's been nearly five years since Congress and this Committee had to consider whether to reauthorize the satellite TV compulsory license, and as part of that process, took an in depth look at the video marketplace in which DISH Network and DIRECTV operate. It was after conducting this evaluation that Congress passed the Satellite Television Extension and Localism Act of 2010, which extended the statutory copyright license until 2014, and made some changes to the rules governing the satellite TV industry to reflect the marketplace of 2009. As you probably know, even without the benefit of this hearing or my testimony, a lot has changed. So the fact that Congress and this Committee are now once again evaluating the video marketplace as part of its consideration of whether to renew the satellite TV license for another five years is very appropriate, and your decisions stand to benefit consumers and competitive markets.

It's actually been even longer since Congress or this Committee has conducted a serious examination of the rules governing the cable TV industry. Hearings on cable industry pricing used to be an annual affair, but more recently they occur only sporadically. While there have been some hearings on the video marketplace with respect to mergers, like Comcast-NBCU, members of Congress are not forced to make periodic decisions about whether certain cable rules should be extended or eliminated because the majority of rules that apply to the cable industry do not sunset in the same way as the satellite TV copyright license. In fact, the last time Congress made broad legislative changes to the rules governing the cable industry was in the 1990s. So if you think a lot has changed in the last five years, then you undoubtedly recognize there have been even more dramatic changes in the marketplace in the last 20 years. I'll highlight some of these changes later on in my testimony, and leave you with my conclusion that the video market is no longer the same one that Congress sought to fix two decades ago.

Not surprisingly, while some of the laws passed by Congress continue to serve their purpose, others now fail to properly govern the video marketplace as it exists. In what follows, I will discuss in more detail rules that continue to work and serve their intended purpose and need no change except for a tweak here and there, such as the cable copyright license and the program access rules. I will also discuss a few rules that have grown noticeably stale and are ripe for updating, such as the retransmission consent rules and the Sports Broadcasting Act of 1961. To start, I'm going to discuss a rule that works, and has stood the test of time.

<u>Section 111 Cable Statutory License</u>

Copyright holders and cable operators have been operating under the Section 111 statutory license since 1976, and throughout that time, it has served its goal in compensating copyright holders for the retransmission of their work in a way that is minimally burdensome.

The Section 111 license arose from a compromise reached among the stakeholders in the 1970s. Copyright holders whose content airs on the signals of broadcast stations felt that they should be compensated by cable operators who retransmit these signals. One of the issues cable operators were concerned about was whether they would be able to efficiently clear rights from potentially thousands of copyright holders in advance of their content airing on the broadcast stations. Though less than perfect, the Section 111 license nevertheless addressed the concerns of both groups, and has proven to be an efficient and effective means of clearing copyrights to this day. In fact, in 1999, Congress provided the satellite industry a similar license.

If Congress were to repeal Section 111 and 119, clearing the rights to all of the programming on retransmitted broadcast stations would present very difficult burdens, both logistically and financially. Cable operators and other multichannel video programming distributors ("MVPDs") would be unable to anticipate all the copyrighted works that a broadcast station would air. Faced with potential copyright liability, operators may have to drop stations, where able, but face an unsolvable problem with respect to must carry stations that cannot be dropped. Without an efficient licensing scheme, it is likely that pay TV customers would lose access to programming from broadcast stations that they have historically received. Moreover, these customers may end up paying more money for the same content due to the transaction costs of clearing copyright that does apply today. For some smaller MVPDs and broadcasters, the harms would threaten their viability. For rural consumers, the proposals could result in fewer choices and higher costs. Maintaining the status quo avoids these consequences.

Under these circumstances, it is not at all surprising that a wide range of stakeholders – including representatives of broadcast stations, copyright users and even some copyright owners – agrees that it is appropriate for the statutory license to remain unchanged.

Powerful rights holders argue that the license should be eliminated because they are underpaid. Ironically, these rights holders might actually be overcompensated for their works today. Outdated retransmission consent rules that distort the market allow broadcasters to extract soaring retransmission consent fees from MVPDs. A significant portion of this revenue is not kept by broadcasters, but returned to the rights holders of the programming that runs on the broadcast stations, who predominately are the broadcast networks and sports leagues. Therefore, retransmission consent fees end up being additional indirect payments from MVPDs to copyright owners that supplement the royalties that these rights holders get through the statutory license. Taking these supplemental payments into account, rights holders claim that they are undercompensated doesn't add up.

Should Congress reach a different conclusion about the need to maintain the copyright license, changes to the compulsory license cannot be done in isolation. As the Copyright Office and the Federal Communications Commission ("FCC") have long recognized, the license is intertwined with key broadcast regulations, such as retransmission consent, must carry, and the FCC's exclusivity rules. Changes to the license must coincide with reform of these broadcast signal carriage rules. It is also essential that two policies that are essential to smaller and rural MVPDs be preserved:

- Clear access to distribute "distant" signals; and
- Special considerations for smaller MVPD systems.

First, for over 35 years, Section 111 has cleared copyright for cable carriage of what are considered "distant" broadcast signals because they are transmitted from another designated market area (DMA). In adopting this license, Congress recognized that many cable systems in rural areas, especially those on the outskirts of DMAs, offered "distant" signals because "local" signals were unavailable or limited. Rural consumers benefitted then, and still do today.

For some consumers, "local" stations are actually located out-of-state, and the importation of "distant" stations provides them with in-state news, sports, and political coverage. For others, "distant" signals provide vital weather warnings that come prior to, rather than during or after, the event.

For these reasons and others, any changes to the compulsory license must also include a provision that smaller and rural MVPDs can continue to be permitted to provide "distant signals."

Second, the special consideration that smaller MVPDs have historically received through the Section 111 license must also continue. Since 1976, Congress has allowed smaller MVPDs to pay lower copyright license fees. This policy recognized that smaller MVPDs provided needed services, and operate under economic constraints that are vastly different from those affecting larger operators. This remains true today. Congress has maintained the small system provisions throughout every amendment to the license, validating their importance.

Elimination of the license would undoubtedly expose smaller MVPDs to rampant price discrimination, leading these operators to pay higher copyright license fees than larger MVPDs. ACA has documented to Congress and the FCC that many broadcasters and programmers routinely charge smaller operators substantially higher programming fees. It is easy to understand. A copyright holder has a financial incentive to enter into a deal with a large cable operator that provides service to tens of millions of subscribers because not reaching an agreement means losing out on receiving a big payout. Therefore, the price agreed upon in a negotiation involving a large cable operator is far more likely to be closer to the fair market value of the content than the price reached in a negotiation with a small cable operator. A copyright holder doesn't have the same incentive to reach individual deals with hundreds of small cable operators who each serve only a few thousand subscribers. The cost of conducting all of these transactions is far greater, and the amount of money that would be lost as a result of not entering each deal is significantly lower. In fact, for many larger copyright holders the amount of money paid by a single small cable operator is materially insignificant. Not surprisingly, in these instances, the copyright holder would set the price much higher than the price it charges large cable operator, and tell the small cable operator, "take-it-or-leave-it," knowing the cable operator needs the rights to its programming more than it needs to be paid by the cable operator. This type of price discrimination has no basis in cost; rather, the basis is unmatchable market power.

The Section 111 license protects smaller MVPDs from this sort of price discrimination by establishing uniform license fees based on gross revenues and other variables. With no compulsory license, powerful rights holders would "stick it to the small guy" – conduct that would threaten smaller operators and their customers who rely on their service. Accordingly, any change to the compulsory license must include ensure smaller operators not pay more per customer than larger operators.

While there are some parties that suggest that the copyright licenses can be eliminated, and propose alternative market oriented solutions to take its place. We urge the Committee to take into account the success of the copyright license regime, and the potential impact that changes to the license would have on smaller cable operators and their customers. In sum, we believe that the public continues to remain best served by maintaining the license.

But there are issues and dynamics that merit review and action by this Committee. In the following, I will discuss the rules that govern both the retransmission consent and sports programming marketplace, and how these rules are either creating problems in the market today or not sufficiently addressing market failures. Moreover, I will talk about how a law passed by Congress to protect buying groups, typically used by small cable operators, from being discriminated against by vertically integrated programmers, is no longer offering such protection. Finally, I will also discuss how a statute intended to create a competitive marketplace for the sale of cable set top boxes has failed, and at the same time put a significant burden on smaller operators.

<u>Retransmission Consent</u>

The recent retransmission consent impasse between Time Warner Cable ("TWC") and CBS Corp. ("CBS") is the latest and most visible sign of serious flaws in the rules governing the retransmission consent market. The main problem is that Congress passed a law based on marketplace conditions that no longer exist.

In the last twenty years, we've seen satellite TV and telephone companies successfully launch multichannel video services that compete with cable. Today, cable faces robust competition. In our case, the satellite TV providers have over 60% of the video market in the areas we serve. Moreover, there are other types of video distributors in the market. Over-the-top video distributors, like Netflix, Amazon, and Hulu have entered the market, and have obtained 30 million customers. In addition, the programming market has largely consolidated into five media conglomerates that control the big 4 television networks (ABC, NBC, CBS, and FOX) and dozens of the most popular cable channels. This is not the marketplace of 1992.

As a result of the outdated rules and regulations, consumers are being harmed. In the following, I will describe three retransmission consent-related issues that require Congress' attention. First, broadcasters are flouting current rules, including antitrust laws, by colluding in their sale of retransmission consent. Second, existing rules and regulations are failing to protect consumers from broadcasters that pull their signals during retransmission consent negotiating impasses. Finally, current rules require consumers who subscribe to cable service to also subscribe to the broadcast stations that elect retransmission consent, even if they don't want to receive those broadcast stations via their subscription service. Each of these issues can be addressed through narrowly-tailored fixes, and I encourage the Committee to consider addressing them as part of the reauthorization of the satellite copyright license.

Coordinated Retransmission Consent Negotiations

This committee should be concerned that separately owned, same-market broadcasters are colluding in the sale of retransmission consent to pay-TV providers in at least 43 television markets by coordinating their negotiations. Available evidence submitted by large and small cable operators to the FCC shows that when broadcasters engage in this anticompetitive conduct, they can extract at least 22% higher fees than if they negotiate separately. One cable operator presented evidence showing that its rates were more than 160% higher. To put this price increase in perspective, antitrust authorities are generally concerned whenever horizontal consolidation results in price increases greater than 5%. These price increases are passed along to consumers, who end up paying for them in higher costs.

The practice of separately owned, same market broadcast stations coordinating their retransmission consent negotiations is widespread and increasing. This year, we have seen a rash of broadcaster deals that could result in broadcasters entering into coordination agreements that would likely include the coordination of retransmission consent negotiations.

ACA has brought this issue to the attention of the FCC as part of its retransmission consent rulemaking and quadrennial media ownership review. The two rulemakings remain pending at the agency. Also at the request of Senator Rockefeller, the Government Accountability Office ("GAO") is preparing a report on the impact of this practice on competition and consumers. However, this issue is not solely under consideration by the FCC and GAO. The US Department of Justice ("DOJ") and the Federal Trade Commission ("FTC") also have authority to review this practice under the antitrust statutes. In fact, in 1996, the DOJ brought a case against three separately owned broadcasters in Texas who were coordinating their negotiations. Currently, the DOJ and FTC are reviewing a number of broadcaster transactions where the purchasers of the stations will enter into agreements to coordinate the activities. We are hopeful that the DOJ and FTC will consider the impact of these deals on competition and consumers with regard to the coordination of retransmission consent, and prohibit such arrangements in the deals under review, thereby setting a marker for other broadcasters to see that collusion in retransmission consent negotiations is not permitted.

Blackouts

The recent retransmission consent dispute between Time Warner Cable and CBS highlighted how existing rules lack a reliable safety net for consumers when broadcasters and MVPDs cannot reach mutual agreement. For 32 days in August and September, more than three million TWC and Bright House Networks ("BHN") subscribers were without access to CBS network programming, and local news and weather from their local CBS stations, through their cable operator because of a dispute over prices, terms and conditions of retransmission consent in the eight large television markets where CBS owns and operates broadcast stations. An even larger number of TWC and BHN broadband Internet subscribers were been denied access to the online video content found on CBS.com and available to all other Internet users, regardless of whether their local CBS station has been blacked out. This latest blackout was not an isolated incident. In 2012, millions of Americans went without access to their local broadcast signals after station owners cut off programming 91 times. This was a 78% increase over 2011, and even more over 2010.

Existing law prevents a cable operator from dropping a broadcast station during the sweeps period if its retransmission consent agreement expires during "sweeps." Such periods are the quarterly national four-week ratings periods – generally including February, May, July and November. While cable operators are prohibited from pulling broadcast signals during periods of time financially important to broadcasters, there is no constraint on broadcasters' pulling signals from cable operators.

Congress should prevent broadcasters from pulling signals from cable operators if retransmission consent agreements expire before new agreements have been signed. ACA has proposed adoption of a rule mandating that broadcasters and MVPDs continue to offer a broadcast station's signal to consumers after an existing retransmission consent agreement expires and while the terms of a new agreement are pending resolution of a negotiating dispute. Under this approach, the parties' existing retransmission consent agreement would automatically be extended past its expiration date, and an MVPD would continue to pay the broadcaster for retransmission consent rights per such contract. At the time that the dispute is resolved and a new agreement is signed, the prices and terms of the new agreement would retroactively apply to begin immediately after the previous agreement's expiration date and any required true-up of prices would be applied. This proposal does not call for Congress to side with a broadcaster or MVPD on the appropriate prices, terms, and conditions of carriage for the broadcaster's signal. It also does not give MVPDs the right to carry the broadcaster's signal indefinitely. In the event that various forms of voluntary mediation fail, binding commercial baseball style arbitration would provide final resolution. This proposal focuses on the narrow need to ensure consumers have continued access to broadcast stations while parties continue to negotiate. The FCC has adopted this type of standstill relief on numerous occasions, and it has worked.

Congress should adopt this type of standstill relief now to make sure that the blackout that affected millions of Time Warner Cable and Bright House Network subscribers is the last of its kind.

Retransmission Consent Must-Buy Obligation

Cable operators are required by regulation to have a basic service tier that includes all local broadcast television stations offered by the cable operator. Moreover, all subscribers to cable operators must purchase the basic service tier in order to receive additional video programming. This means cable operators must include both stations that seek carriage for no compensation, like must-carry stations and

PEG channels, and stations that elect retransmission consent and demand payment for carriage in a tier that every subscriber must purchase.

These rules create two problems. First, consumers who wish to subscribe to a cable operator must pay for the broadcast stations that elect retransmission consent whether they want these channels or not. Consumers who do not want these broadcast stations from their cable operator either may not want them at all, or may wish to receive them through an alternative source, such as using an over-the-air antenna that allows them to get the channels for free. Current law prevents cable operators from putting the retransmission consent stations on a separate tier, and allowing its customers to choose whether they want to pay to receive this broadcast tier or not.

Second, tier placement and subscriber penetration levels are critical terms of negotiation between cable operators and non-broadcast programmers. Non-broadcast programmers highly value lower tier placement and higher subscriber penetration, and cable operators who provide lower tier placement and higher subscriber penetration pay lower carriage fees. By providing broadcasters that elect retransmission consent an automatic right to appear on the basic service tier and obtain 100% cable subscriber penetration, Congress has taken off the table a critical term of negotiation that cable operators could leverage with broadcasters to obtain lower rates.

Congress should not require inclusion of broadcast stations that elect retransmission consent on the cable basic service tier. Moreover, Congress should ensure that consumers who wish to receive cable television service without subscribing to the retransmission consent stations may do so. Such a modification to existing rules would impact only how broadcast stations that elect retransmission consent are sold. It would not affect the right of broadcast stations that elect must carry and other channels, such as PEG channels, to be on the basic service tier and included with the purchase of any other cable television service.

<u>The Sports Programming Market</u>

Today's sports programming market is known for rapidly escalating sports fees. Professional sports leagues benefit from national sports networks and big 4 broadcast networks that aggressively bid against one another (as do regional sports networks) for the rights to air their sporting events. The sports leagues have commanded more than $110 billion from broadcast and cable TV networks for the rights to televise their sporting events well into the next decade. The NFL alone will receive $28 billion from three broadcast networks starting after the 2013 season for the rights to their programming for nine years. These networks bid extraordinary amounts knowing they can pass on their costs to pay-TV providers. Not surprisingly ESPN is the most expensive cable network at $5.54 per subscriber per month according to SNL Kagan, with smaller MVPDs paying even higher prices. The fee is expected to grow to $6.95 by 2016. Also predictably, the broadcast stations affiliated with the big 4 broadcast networks and the ones electing retransmission consent, and demanding significant increases in their fees.

A key part of the sports programming market problem stems directly from a decision Congress made more than 50 years ago to create a legislative antitrust exemption for professional sports leagues in the Sports Broadcasting Act. Similar to the problems with the retransmission consent marketplace, the sports programming market has experienced dramatic change over the past five decades. For instance, in 1961 when the Act was adopted, there were far fewer sports teams per league, and some of the professional sports leagues faced same-sport competition from new leagues. For instance, there were two competing professional football leagues, the National Football League ("NFL") and the American

Football League ("AFL"). While it might have made some sense to give the professional sports leagues a pass from the antitrust rules at the time to ensure that they could effectively negotiate sports programming deals, a lot has changed since then. Today, each of the professional sports leagues has dozens of teams in dozens of markets, and there is no significant same-sport rival to the NFL, Major League Baseball, the National Basketball Association, or the National Hockey League. These leagues, the NFL in particular, are dominant in the video programming market, commanding billions of dollars for its sports programming rights. Unlike in the 1960s, when the leagues could only sell their rights to the broadcast stations, these leagues now sell to national cable networks and they have their own national networks that carry their content as well. Further, there are new networks coming to market interested in acquiring sports rights, like FOX Sports 1 and NBCSports. So, while the downstream programming marketplace has gotten more competitive, the sports leagues have grown and consolidated, and yet they maintain their antitrust exemption.

Another part of the problem is the leverage that the programmers who acquire these sports programming rights can exert onto pay-TV providers and their customers. Networks like ESPN and regional sports channels demand that pay-TV providers sell their networks on basic tiers. With the programming on basic tiers rather than in a separate Sports package, the cost for this programming is thrust upon all the subscribers of all pay-TV providers, whether they want the programming or not.

The problems with the sports programming market are extensive, but as a first step, Congress should eliminate an exemption from the antitrust rules that should never have been granted in the first place.

The Program Access Rules

Congress sought to ensure that smaller operators were protected from discriminatory and unfair behavior by vertically integrated programmers by extending "program access" protections to their programming buying groups. However, the regulations adopted by the FCC in 1993, particularly its definition of a "buying group," prevent the nation's largest programming buying group, the National Cable Television Cooperative ("NCTC") from availing itself of the protections Congress intended. This means that the 900+ cable operators, including Shentel, who obtain most of their national programming through this organization, are effectively denied the protection of the program access rules. The FCC is now considering the adoption of new rules that would allow a buying group, like the NCTC, to file program access complaints and also contain safeguards to prevent programmers from evading the protections of the rules. It is vital that the FCC act now by updating its definition of a buying group, make clear that programmers must treat buying groups comparably to other MVPDs, and do not arbitrarily exclude certain buying group members from joining a master agreement signed by the buying group.

The Set-Top Box Integration Ban

As discussed, in many aspects the video marketplace has changed, and rules and regulations have not been updated to reflect the current marketplace. This isn't just true with regard to the programming market, but also in the market for set top boxes. In 1996, Congress believed that consumers had no other option other than to lease set top boxes from their cable operator, and so passed legislation to give the FCC authority to adopt rules that would promote the development of a retail set-top box marketplace. In response, the FCC adopted an "integration ban" which required that the security functions of a set-top box be separated from its other functions with the purpose of creating "common reliance" by cable operators and consumers on non-integrated set-top boxes. The "integration ban" was put into place in

2007, and the rules applied to all cable operators regardless of the number of subscribers served by the operator.

The ban has only increased the cost of leased boxes for cable operators and their consumers. The ban resulted in significantly higher costs to operators to purchase non-integrated set-top boxes that provided no greater consumer functionality than was available before the ban. Some estimates indicate that more than $1 billion in costs were added to the price of set-top boxes leased to subscribers since the date the ban went into effect.

Making matters worse, the ban imposed costs on cable operators but not on their competitors. DBS providers, and non-cable IPTV providers, like AT&T, who compete against cable operators, are permitted to offer integrated set-top boxes to their subscribers for lease, giving them a regulatory advantage.

The increased cost of cable set-top boxes as a result of the integration ban slowed down the plans of many cable operators to transition from analog to more efficient and innovative digital service. Accordingly, consumers of these cable systems have not benefited from the advanced services that operators otherwise would have been able to provide.

The impact of the integration ban has had a disproportionate impact on small cable operators, and remains a burden for nearly all of them. In spite of this fact, the FCC has provided no exemption for smaller cable operators despite the fact that small operators do not drive equipment development and subjecting them to the ban would provide no material benefit to the development of a competitive retail set-top box market.

Today, the marketplace is vastly different from 1996. The marketplace has responded to consumer interest in getting content on different types of devices, such as Internet connected TVs, streaming to tablets, mobile telephones and other “smart” video devices. Given the changes in the marketplace and the burden that the integration has caused on the industry, particularly on smaller operators, and their customers, the time has come for elimination of the integration ban. Such an action need not eliminate the obligation on cable operators to support set-top boxes manufactured by a third-party such as TiVo so that consumers can continue using these devices they purchased at retail outlets for use with their cable service, as well as acquire new devices brought to market. Congress can eliminate the “integration ban” and still require cable operators to support these third-party devices.

Closing

Because of the 5-year term of the Sec. 119 satellite license, the Judiciary Committee regularly reviews the laws governing the satellite TV industry, and makes changes to ensure that the rules do not fall too far behind the marketplace. It essence, the Committee gives the satellite TV industry a physical. Because the rules governing the cable industry do not expire in the same way, Congress has never conducted a similar type of physical in decades. Mr. Chairman, in past meetings, we’ve discussed the idea of giving the cable industry a similar type of physical. Given the significant changes in the marketplace, we believe the time has come for Congress to conduct such a review, and we hope that some of the issues addressed above would be under consideration for reform. Thanks again for the opportunity to testify.

48 Instances of Separately Owned, Same-Market Broadcasters Affiliated with a Big 4 Network Simultaneously Negotiating Retransmission Consent With an MVPD Using a Single Representative

		Station #1			Station #2		
DMA	DMA Rank	Owner (also Controlling Entity)	Call Letters	Affil.	Owner	Call Letters	Affil.
Columbus, OH	32	Sinclair Broadcast Group	WSYX	ABC	Cunningham Broadcasting	WTTE	FOX
Jacksonville	50	Newport Television	WAWS	FOX	High Plains Broadcasting	WTEV	CBS
Providence-New Bedford	53	LIN TV	WPRI	CBS	Super Towers	WNAC	FOX
Wilkes Barre-Scranton-Hztn	54	Nexstar Broadcasting Group	WBRE	NBC	Mission Broadcasting	WYOU	CBS
Dayton	63	Sinclair Broadcast Group	WKEF	ABC	Cunningham Broadcasting	WRGT	FOX
Charleston-Huntington	65	Sinclair Broadcast Group	WCHS	ABC	Cunningham Broadcasting	WVAH	FOX
Springfield, MO	75	Schurz Communications	KYTV	NBC	Perkin Media	KSPR	ABC
Cedar Rapids-Wtrlo-IWC&Dub	89	Sinclair Broadcast Group	KGAN	CBS	Second Generation of Iowa	KFXA	FOX
Savannah	92	New Vision Television	WJCL	ABC	Parkin Broadcasting	WTGS	FOX
Baton Rouge	94	Communication Corp of America	WGMB	FOX	White Knight Broadcasting	WVLA	NBC
Burlington-Plattsburgh	95	Smith Media	WFFF	FOX	Lambert Broadcasting	WVNY	ABC
Greenville-N. Bern-Washngtn	99	Bonten Media Group	WCTI	ABC	Esteem Broadcasting	WFXI	FOX
Johnstown-Altoona-St Colge	102	Peak Media	WWCP	FOX	Palm Television	WATM	ABC
Lincoln & Hastings-Krny	105	Pappas Telecasting	KHGI	ABC	Omaha World-Herald	KFXL	FOX
Tyler-Longview(Lfkn&Ncgd)	107	Communication Corp of America	KETK	NBC	White Knight Broadcasting	KFXK	FOX
Fort Wayne	109	Granite Broadcasting	WISE	NBC	Malara Broadcasting Group	WPTA	ABC
Youngstown	110	New Vision Television	WKBN	CBS	Parkin Broadcasting	WYTV	ABC
Augusta-Aiken	111	Media General	WJBF	ABC	Schurz Communications	WAGT	NBC
Peoria-Bloomington	116	Granite Broadcasting Crop.	WEEK	NBC	Barrington Broadcasting	WHOI	ABC
Peoria-Bloomington	116	Nexstar Broadcasting Group	WMBD	CBS	Sinclair Broadcast Group	WYZZ	FOX
Fargo-Valley City	117	Hoak Media	KVLY	NBC	Parker Broadcasting	KXJB	CBS
Traverse City-Cadillac	120	Heritage Broadcasting Group	WWTV	CBS	Cadillac Telecasting	WFQX	FOX
Columbus, GA (Opelika, AL)	127	Raycom Media	WTVM	ABC	Southeastern Media Holdings	WXTX	FOX
Amarillo	130	Nexstar Broadcasting Group	KAMR	NBC	Mission Broadcasting	KCIT	FOX
Chico-Redding	131	Catamount Holdings	KHSL	CBS	Evans Broadcasting	KNVN	NBC
Wilmington	132	Raycom Media	WECT	NBC	Southeastern Media Holdings	WSFX	FOX
Columbus-Tupelo-W Pnt-Hstn	133	WTVA, Inc.	WTVA	NBC	Southern Broadcasting	WKDH	ABC
					Lingard Broadcasting	WLOV	FOX
Rockford	134	Nexstar Broadcasting Group	KQRF	FOX	Mission Broadcasting	WTVO	ABC
Topeka	136	New Vision Television	KTKA	ABC	Parkin Broadcasting	KSNT	NBC
Monroe, LA-El Dorado	137	Hoak Media	KNOE	CBS	Parker Broadcasting	KAQY	ABC
Monroe, LA-El Dorado	137	Nexstar Broadcasting Group	KARD	FOX	Mission Broadcasting	KTVE	NBC
Duluth-Superior	139	Granite Broadcasting	KBJR	NBC	Malara Broadcast Group	KDLH	CBS
Wichita Falls & Lawton	142	Nexstar Broadcasting Group	KFDX	NBC	Mission Broadcasting	KJTL	FOX
Wichita Falls & Lawton	142	Drewry Broadcast Group	KSWO	ABC	Hoak Media	KAUZ	CBS
Lubbock	143	Nexstar Broadcasting Group	KLBK	CBS	Mission Broadcasting	KAMC	ABC

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DMA	DMA Rank	Owner (<u>also Controlling Entity</u>)	Call Letters	Affil.	Owner	Call Letters	Affil.
Erie	146	Nexstar Broadcasting Group	WJET	ABC	Mission Broadcasting	WFXP	FOX
Erie	146	SJL of Pennsylvania	WICU	NBC	Lilly Broadcasting	WSEE	CBS
Sioux City	147	Titan TV Broadcast Group	KPTH	FOX	Waitt Broadcasting	KMEG	CBS
Anchorage	148	Coastal Television Broadcasting	KTBY	Fox	Vision Alaska	KYUR	ABC
Joplin-Pittsburg	149	Nexstar Broadcasting Group	KSNF	NBC	Mission Broadcasting	KODE	ABC
Joplin-Pittsburg	149	Saga Communications	KOAM	CBS	Surtsey Media	KFJX	FOX
Rochestr-Mason City-Austin	153	Quincy Newspapers	KTTC	NBC	SagamoreHill Broadcasting	KXLT	FOX
Terre Haute	154	Nexstar Broadcasting Group	WTWO	NBC	Mission Broadcasting	WFXW	FOX
Gainesville	163	CP Media	WGFL	CBS	MPS Media	WNBW	NBC
Abilene-Sweetwater	164	Nexstar Broadcasting Group	KTAB	CBS	Mission Broadcasting	KRBC	NBC
Billings	168	Nexstar Broadcasting Group	KSVI	ABC	Mission Broadcasting	KHMT	FOX
Casper-Riverton	196	Mark III Media	KGWC	CBS	Silverton Broadcasting	KTWO	ABC
					Wyomedia	KFNB	FOX
San Angelo	197	Nexstar Broadcasting Group	KLST	CBS	Mission Broadcasting	KSAN	NBC