

April 4, 2019

## **The T-Band Spectrum Contributed to the Incentive Auction Proceeds**

### 1. Executive Summary

NPSTC and public safety agencies who rely on the T-Band spectrum have provided clear documentation that relocation out of the public safety T-Band spectrum as required under Section 6103 of Public Law (P.L.) 112-96 would significantly disrupt mission critical public safety voice communications in key major urban areas. A significant number of industrial-business licensees interleaved in the T-Band spectrum would also suffer, even though they are not covered by Section 6103. The loss of auction revenue has been cited in discussions as a potential roadblock to adopting legislation to repeal Section 6103 of P.L. 112-96. However, the T-Band spectrum has been an essential element of the Federal Communications Commission's 2016-2017 Incentive Auction, and has already contributed significantly to the \$19.8B in proceeds received by providing flexibility to the TV repacking process and reducing the number of TV stations that would otherwise have to be purchased outright. At the conclusion of repacking, the T-Band (470-512 MHz or TV channels 14-20) will support 453 full power and class A TV stations, 231 of which were relocated to the T-Band spectrum to accommodate TV repacking and the incentive auction process. In addition to disrupting public safety operations, failure to repeal Section 6103 of P.L. 112-96 would potentially undermine the TV repacking process and place these TV stations that are already moving at Congress' and the Commission's direction at risk.

### 2. Background

On February 22, 2012, P.L. 112-96 was enacted to provide spectrum and funding for the Nationwide Public Safety Broadband Network (NPSBN) and implementation by the First Responder Network Authority (FirstNet), an overall positive outcome for public safety. The FirstNet broadband network is very beneficial for public safety video and data operations. However, Section 6103 of P.L. 112-96 requires the FCC to reallocate the public safety T-Band spectrum within the 470-512 MHz band and begin an auction of that spectrum by February 22, 2021, and clear public safety operations from the T-Band within 2 years of auction close.

Section 6103 of P.L. 112-96 is of grave concern to public safety, which uses the spectrum to support voice communications (such as dispatch and on-scene tactical) operations of law enforcement, the fire services, and emergency medical services (EMS). The T-Band spectrum is allocated for public safety and industrial/business use within a 50-mile radius of the following metropolitan centers: Boston, Chicago, Dallas, Houston, Los Angeles, Miami, New York City, Philadelphia, Pittsburg, San Francisco, and Washington D. C. Note that Section 6103 of P.L. 112-96 does *not* require that industrial/business users be relocated out of the band.

A comprehensive NPSTC T-Band report issued March 15, 2013 concluded there is insufficient spectrum in any public safety band to support relocation out of the T-Band.<sup>1</sup> The study also provided a relocation cost estimate for each T-Band area and concluded the cost of relocation in all eleven T-Band areas would be approximately \$5.9B, even if spectrum were available. As shown in the report, the amount of spectrum within the T-Band used for public safety varies in each of these 11 areas. Also, most of the public safety T-Band spectrum is configured in slivers of bandwidth much too small to support broadband operation.

A subsequent NPSTC T-Band Update Report dated May 31, 2016 reaffirmed the continued need for the T-Band spectrum and quantified the population in each of the eleven T-Band areas.<sup>2</sup> That update report also listed the full power and class A TV stations in the T-Band at that time, and noted business/industrial operations that also operate in the T-Band spectrum.

### 3. Analysis of Potential T-Band Auction

- NPSTC and public safety agencies who rely on the T-Band spectrum have provided clear documentation that relocation out of the public safety T-Band spectrum as required under Section 6103 of P. L. 112-96 would significantly disrupt public safety mission critical voice communications in key major urban areas. Also, the language of Section 6103 is silent on the issue of relocating the business and industrial users of the T-Band spectrum interleaved with the public safety users. While NPSTC has not conducted an analysis of the business and industrial use of the spectrum, NPSTC believes the additional costs to relocate those users would be significant. The Enterprise Wireless Alliance (EWA) sponsored a study that estimated the cost just to repack industrial/business licensees within a dedicated portion of the T-Band would be \$449.2M.<sup>3</sup> The cost of relocating industrial/business users out of the T-Band would be significantly greater because complete equipment replacement would be required, rather than simple retuning of existing equipment.
- Potential auction revenue has been cited in discussions as a potential roadblock to adopting legislation to repeal Section 6103 of P.L. 112-96. However, to public safety's knowledge, there was no scoring by the CBO on the potential revenue from a T-Band auction when the auction and relocation requirements were adopted.
- Given the characteristics of the T-Band spectrum, *i.e.*, it is only available in eleven metropolitan areas and not nationwide, it is configured in disjointed slivers incompatible with broadband operation, and both industrial mobile and numerous television operations also occupy the same band, NPSTC is skeptical that a T-Band auction would generate any significant auction revenue. Thus, the public safety T-Band spectrum required to be auctioned under Section 6103 of P.L. 112-96 would not support commercial broadband operation, nor any nationwide deployment.

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<sup>1</sup> **NPSTC T-Band Report** released March 15, 2013, available at [http://www.npstc.org/download.jsp?tableId=37&column=217&id=2678&file=T\\_Band\\_Report\\_20130315.pdf](http://www.npstc.org/download.jsp?tableId=37&column=217&id=2678&file=T_Band_Report_20130315.pdf)

<sup>2</sup> **NPSTC T-Band Update Report** issued May 31, 2016 available at [http://www.npstc.org/download.jsp?tableId=37&column=217&id=3696&file=T\\_Band\\_Update\\_Report\\_Final.pdf](http://www.npstc.org/download.jsp?tableId=37&column=217&id=3696&file=T_Band_Update_Report_Final.pdf).

<sup>3</sup> Industrial and Business T-Band Relocation Costs, prepared for EWA by Televate, LLC, June 11, 2013.

- In 2018, a major carrier issued a press release that advised “[t]he T-Band has limited commercial value for mobile broadband” and urged prompt action on a bill to repeal the T-Band auction requirement.<sup>4</sup>
- Accordingly, auction of the public safety T-Band spectrum is unlikely to yield enough funding to cover public safety relocation costs. Public safety relocation would then need to be funded by the taxpayers, not by auction revenue.
- To the best of our knowledge, the Congressional Budget Office (CBO) has not provided any estimate of the budgetary impact of auctioning the T-Band spectrum, so removing the auction requirement is revenue neutral. Indeed, NPSTC notes that the T-Band spectrum has already indirectly contributed to the revenue attained in the Congressionally mandated television broadcast incentive auction. The incentive auction cleared spectrum in the 600 MHz band for commercial use. Neither that policy result nor the auction revenue from the incentive auction would have been possible without a TV repacking process, which relied in no small part on the availability of T-Band spectrum.
- The results of the TV repacking show that the T-Band, *i.e.*, 470-512 MHz/TV channels 14-20, is an important element of the repacking process, which is underway and scheduled to be completed in July 2020. The FCC’s own data show that once the repacking process concludes, TV channels 14-20, *i.e.* the T-Band spectrum, will support 453 full power and class A TV stations.<sup>5</sup> Analysis of the post-auction channels and the pre-auction channels in this FCC data shows a net increase of 231 full power and class A TV stations placed in channels 14-20 as a result of repacking. Appendix A of this paper includes a list of the stations currently operating on, or being relocated to, TV channels 14-20 from the FCC data files.
- The Incentive Auction yielded gross proceeds of \$19.8B, revenue that would not have been possible without the flexibility to move TV stations into T-Band during the repacking process.
- In summary, there is no public benefit to auctioning and clearing the public safety T-Band spectrum as required under Section 6103 of P.L. 112-96. To the contrary, such an auction/clearing process would cause major disruption to public safety communications and require taxpayers to fund relocation of public safety systems for which insufficient auction revenue would be raised, and for which there is no comparable spectrum alternative. Finally, the T-Band spectrum has already contributed to Federal revenue, given its deployment to support TV repacking for the incentive auction. In view of all the above, Congress must act to repeal Section 6103 of P.L. 112-96.

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<sup>4</sup> Verizon Statement on T-Band Act of 2018, April 27, 2018.

<sup>5</sup> [https://data.fcc.gov/download/incentive-auctions/Current\\_Transition\\_Files/](https://data.fcc.gov/download/incentive-auctions/Current_Transition_Files/) (as of February 25, 2019)

## Appendix A – TV Channel 14-20 Results of FCC Repacking to Support Incentive Auction

FacID	Call Sign	To Ch	From Ch	City or DMA	State
35655	KTBY	20	20	ANCHORAGE	AK
13813	KATN	18	18	FAIRBANKS	AK
20015	KJNP-TV	20	20	NORTH POLE	AK
71325	WDBB	14	18	Birmingham	AL
24257	W47EI-D	16	47	Birmingham	AL
16820	WABM	20	36	BIRMINGHAM	AL
720	WIIQ	19	19	DEMOPOLIS	AL
28119	WZDX	18	41	HUNTSVILLE	AL
48693	WHNT-TV	19	19	HUNTSVILLE	AL
591	WAFF	15	48	Huntsville-Decatur-Florence	AL
57292	WAAY-TV	17	32	Huntsville-Decatur-Florence	AL
6554	WFGX	14	50	Mobile	AL
11906	WPMI-TV	15	15	MOBILE	AL
60827	WMPV-TV	18	20	MOBILE	AL
73187	WKRQ-TV	20	27	MOBILE	AL
30283	WJMY-CD	17	25	Montgomery	AL
62207	WIYC	19	48	TROY	AL
68427	WBMM	18	22	TUSKEGEE	AL
52420	KHMF-CA	14	14	BENTONVILLE	AR
86534	KMYA-DT	18	49	CAMDEN	AR
60354	KHOG-TV	15	15	FAYETTEVILLE	AR
66469	KFSM-TV	18	18	FORT SMITH	AR
2784	KVTJ-DT	18	48	JONESBORO	AR
2769	KTEJ	20	20	JONESBORO	AR
57545	KLRA-CD	20	20	LITTLE ROCK	AR
608	KVTH-DT	16	26	Little Rock-Pine Bluff	AR
24753	KMOH-TV	19	19	KINGMAN	AZ
59440	KNXV-TV	15	15	PHOENIX	AZ
41223	KPHO-TV	17	17	PHOENIX	AZ
67868	KPAZ-TV	20	20	PHOENIX	AZ
30601	KHRR	16	40	Tucson	AZ
53004	KFTU-CD	18	18	TUCSON	AZ
11908	KTTU	19	19	TUCSON	AZ
57456	K08MM-D	15	15	BAKERSFIELD	CA
69735	KBBV-CD	19	19	BAKERSFIELD	CA
83825	KVME-TV	20	20	BISHOP	CA
10535	KPSP-CD	18	38	CATHEDRAL CITY	CA
4939	KBSV	15	15	CERES	CA
33745	KNVN	20	24	CHICO	CA
58605	KCVU	17	20	Chico-Redding	CA
42640	KVIQ	17	17	EUREKA	CA
57457	K17JI-D	17	17	FRESNO	CA
35594	KSEE	20	38	Fresno-Visalia	CA
41126	KLDF-CD	17	17	LOMPOC	CA
35608	KSCI	18	18	LONG BEACH	CA
168338	KMPH-CD	19	49	MERCED-MARIPOSA	CA

58609	KUUVS-DT	18	18	MODESTO	CA
68666	K17GD-D	17	17	PASO ROBLES	CA
18736	KMUM-CD	19	31	SACRAMENTO	CA
334	K20JX-D	20	20	SACRAMENTO	CA
35277	KNSD	17	40	San Diego	CA
10238	KUSI-TV	18	18	SAN DIEGO	CA
6124	KPBS	19	30	SAN DIEGO	CA
33778	KDTV-DT	20	51	SAN FRANCISCO	CA
64987	KSTS	19	49	SAN JOSE	CA
19654	KSBY	15	15	SAN LUIS OBISPO	CA
60639	KSBB-CD	17	17	SANTA BARBARA	CA
63165	KCOY-TV	19	19	SANTA MARIA	CA
68406	KFAZ-CA	18	18	VISALIA	CA
37101	KETD	15	45	Denver	CO
29455	KQDK-CD	16	39	Denver	CO
166510	KPJR-TV	17	38	Denver	CO
68695	KPXC-TV	18	43	DENVER	CO
168750	KSBS-CD	19	41	DENVER	CO
20476	KRMT	20	40	DENVER	CO
48589	KREZ-TV	15	15	DURANGO	CO
84224	KRMU	20	20	DURANGO	CO
31597	KFQX	15	15	GRAND JUNCTION	CO
14042	KRMJ	18	18	GRAND JUNCTION	CO
168449	WAZW-CD	20	46	Washington	DC
71085	WBBH-TV	15	15	FORT MYERS	FL
29715	WTCE-TV	18	38	FORT PIERCE	FL
35575	WTVX	20	34	FORT PIERCE	FL
16993	WCJB-TV	16	16	GAINESVILLE	FL
11909	WFOX-TV	14	32	Jacksonville	FL
53116	WJXT	18	42	JACKSONVILLE	FL
35576	WJAX-TV	19	19	JACKSONVILLE	FL
29712	WCWJ	20	34	JACKSONVILLE	FL
53819	WMOR-TV	18	19	LAKELAND	FL
30129	WPMF-CD	17	38	Miami - Ft. Lauderdale	FL
29547	WSBS-CD	19	50	MIAMI, ETC.	FL
70415	WZXX-CD	20	36	ORLANDO, ETC.	FL
67602	WOPX-TV	14	48	Orlando-Daytona Beach-Melbourne	FL
131	WVEN-TV	15	49	Orlando-Daytona Beach-Melbourne	FL
10549	WRCF-CD	16	35	Orlando-Daytona Beach-Melbourne	FL
71363	WEAR-TV	17	17	PENSACOLA	FL
74112	WTOG	19	44	ST. PETERSBURG	FL
22245	WFXU	17	48	Tallahassee	FL
23486	WTLH	19	50	Tallahassee	FL
31590	WCTV	20	46	Tallahassee	FL
60559	WFTT-DT	20	47	TAMPA	FL
2130	WZRA-CA	15	48	Tampa-St Petersburg-Sarasota	FL
64588	WFTS-TV	17	29	Tampa-St Petersburg-Sarasota	FL
51988	WPBF	16	16	TEQUESTA	FL
70865	WTCN-CA	17	43	West Palm Beach-Ft. Pierce	FL
73136	WJHG-TV	16	18	Panama City	FL
48813	WUVG-DT	18	48	ATHENS	GA

35090	WSKC-CD	14	22	Atlanta	GA
51969	WPXA-TV	16	31	Atlanta	GA
72120	WGCL-TV	19	19	ATLANTA	GA
168812	WANN-CD	20	29	ATLANTA	GA
3369	WBEK-CD	16	16	AUGUSTA	GA
17464	WBPI-CD	19	49	AUGUSTA	GA
11113	WLGA	17	30	Columbus	GA
3359	WRBL	15	15	COLUMBUS	GA
49236	WDNN-CD	20	49	DALTON	GA
21150	WDMA-CD	16	31	Macon	GA
48662	WSAV-TV	16	39	Savannah	GA
29232	KTGM	14	14	TAMUNING	GU
51241	KALO	18	38	HONOLULU	HI
34527	KIKU	19	19	HONOLULU	HI
64548	KITV	20	40	HONOLULU	HI
34859	KOGG	16	16	WAILUKU	HI
89714	KUPU	15	15	WAIMANALO	HI
17625	KFXB-TV	14	43	Cedar Rapids-Waterloo-Iowa City-Dubuque	IA
6885	KWQC-TV	17	36	DAVENPORT	IA
56527	KDSM-TV	16	16	DES MOINES	IA
78915	KDMI	19	19	DES MOINES	IA
46753	KDAO-CD	17	44	MARSHALLTOWN	IA
29086	KYIN	18	18	MASON CITY	IA
53820	KYOU-TV	15	15	OTTUMWA	IA
66170	KTIV	14	41	Sioux City	IA
35097	KKJB	15	39	Boise	ID
27621	KCLP-CA	18	18	BOISE	ID
62424	KCDT	18	45	COEUR D'ALENE	ID
17402	K17ED-D	17	17	PAYETTE	ID
86205	KPIF	15	15	POCATELLO	ID
62430	KISU-TV	17	17	POCATELLO	ID
70428	WBXC-CD	18	46	CHAMPAIGN/URBANA	IL
25686	WICS	15	42	Champaign-Springfield-Decatur	IL
62009	WRSP-TV	16	44	Champaign-Springfield-Decatur	IL
168662	WMEU-CD	18	32	CHICAGO	IL
72115	WGN-TV	19	19	CHICAGO	IL
71425	WWME-CD	20	39	CHICAGO	IL
70852	WAND	20	17	DECATUR	IL
70536	WSEC	18	15	JACKSONVILLE	IL
66983	W15BU-D	15	15	JOHNSON CITY	IL
72945	WTVO	16	16	ROCKFORD	IL
34205	WKOH	17	30	Evansville	IN
17742	WYYW-CD	15	15	EVANSVILLE	IN
189735	WTSN-CD	20	20	EVANSVILLE	IN
22108	WFWA	18	40	FORT WAYNE	IN
25040	WFFT-TV	20	36	FORT WAYNE	IN
67485	WFWC-CD	16	45	Ft. Wayne	IN
49803	WYIN	17	17	GARY	IN
56526	WTTK	15	29	Indianapolis	IN
28199	WDNI-CD	16	19	Indianapolis	IN

70161	WALV-CD	17	46	INDIANAPOLIS	IN
3646	WIPB	19	23	MUNCIE	IN
65247	WAWV-TV	18	39	TERRE HAUTE	IN
65523	KLBY	17	17	COLBY	KS
162115	KWKS	19	19	COLBY	KS
60675	KOOD	16	16	HAYS	KS
83181	KOCW	14	14	HOISINGTON	KS
66413	KWCH-DT	19	19	HUTCHINSON	KS
11912	KAAS-TV	17	17	SALINA	KS
49397	KTKA-TV	16	49	Topeka	KS
43649	KTMJ-CD	20	43	TOPEKA	KS
72358	KSNW	15	45	Wichita-Hutchinson	KS
71861	WKYU-TV	18	18	BOWLING GREEN	KY
64017	WDKY-TV	19	31	DANVILLE	KY
53939	WLKY	14	26	Louisville	KY
8500	WLCU-CD	15	23	Louisville	KY
34167	WMYO	16	51	Louisville	KY
25078	WKYI-CD	18	24	LOUISVILLE	KY
34174	WKMU	17	36	MURRAY	KY
51991	WPSD-TV	19	32	PADUCAH	KY
34222	WKSO-TV	17	14	SOMERSET	KY
16539	WNTZ-TV	15	49	Alexandria	LA
24975	KZUP-CD	20	20	BATON ROUGE	LA
82476	KLWB	17	50	Lafayette	LA
33261	KADN-TV	16	16	LAFAYETTE	LA
21149	KAJN-CD	17	40	LAFAYETTE	LA
35852	KVHP	18	30	LAKE CHARLES	LA
38587	KLTL-TV	20	20	LAKE CHARLES	LA
54280	WNOL-TV	15	15	NEW ORLEANS	LA
71357	WDSU	19	43	NEW ORLEANS	LA
73706	KSHV-TV	16	44	Shreveport	LA
38591	KLTS-TV	17	24	SHREVEPORT	LA
70420	KBXS-CD	20	50	SHREVEPORT	LA
13938	WUPL	17	24	SLIDELL	LA
3658	KARD	19	36	WEST MONROE	LA
69271	WEKW-TV	18	49	Boston	MA
25456	WBZ-TV	20	30	BOSTON	MA
30577	WUNI	19	29	WORCESTER	MA
40618	WCPB	16	28	Salisbury	MD
25683	WGME-TV	15	38	Portland-Auburn	ME
84088	WPFO	17	23	WATERVILLE	ME
16530	WDCQ-TV	15	15	BAD AXE	MI
10212	WOTV	17	20	BATTLE CREEK	MI
25722	W33BY-D	15	33	Detroit	MI
16817	WTVS	20	43	DETROIT	MI
21737	WSMH	16	16	FLINT	MI
36851	WXSP-CD	15	15	GRAND RAPIDS	MI
68433	WXMI	19	19	GRAND RAPIDS	MI
67001	WOBC-CD	16	14	Grand Rapids-Kalamazoo-Battle Creek	MI
36533	WLAJ	14	25	Lansing	MI
9913	WCMW	20	21	MANISTEE	MI

81448	WZMQ	19	19	MARQUETTE	MI
72052	WEYI-TV	18	30	SAGINAW	MI
21254	WTOM-TV	16	35	Traverse City-Cadillac	MI
28510	KSMQ-TV	20	20	AUSTIN	MN
132606	KCGE-DT	16	16	CROOKSTON	MN
35525	KQDS-TV	18	17	DULUTH	MN
35907	KPXM-TV	16	40	Minneapolis - St. Paul	MN
71558	KSMN	15	15	WORTHINGTON	MN
63164	KMIZ	17	17	COLUMBIA	MO
48521	KNLJ	20	20	JEFFERSON CITY	MO
67766	KSNF	17	46	JOPLIN	MO
53843	KCPT	18	18	KANSAS CITY	MO
73998	KPOB-TV	15	15	POPLAR BLUFF	MO
4326	KMOS-TV	15	15	SEDALIA	MO
51102	KOZK	16	23	Springfield	MO
36003	KYTV	19	44	SPRINGFIELD	MO
9375	KEFN-CD	20	49	St. Louis	MO
48525	KNLC	14	14	ST. LOUIS	MO
62182	KETC	17	39	ST. LOUIS	MO
43197	WMAH-TV	16	16	BILOXI	MS
43184	WMAU-TV	18	18	BUDE	MS
25236	WXVT	15	15	GREENVILLE	MS
41883	WBII-CD	20	20	HOLLY SPRINGS	MS
71326	WDBD	14	40	Jackson	MS
43168	WMPN-TV	20	20	JACKSON	MS
83946	WEPH	17	49	TUPELO	MS
37732	WLOV-TV	16	16	WEST POINT	MS
169030	KBGS-TV	16	16	BILLINGS	MT
5243	KSVI	18	18	BILLINGS	MT
14674	KWYB	19	19	BUTTE	MT
13792	KTGF	17	45	GREAT FALLS	MT
35453	KAJJ-CD	18	39	KALISPELL	MT
169027	KUKL-TV	15	46	Missoula	MT
69300	WUNF-TV	20	25	ASHEVILLE	NC
69080	WUNC-TV	20	25	CHAPEL HILL	NC
65919	WHKY-TV	14	40	Charlotte	NC
67022	W21CK-D	15	21	Charlotte	NC
49157	WCCB	18	27	CHARLOTTE	NC
74070	WSOC-TV	19	34	CHARLOTTE	NC
53921	WXII-TV	16	31	Greensboro-High Point-Winston Salem	NC
35582	WYDO	19	47	GREENVILLE	NC
37971	WPXU-TV	16	34	Greenville-New Bern-Washington	NC
8688	WRAL-TV	17	48	RALEIGH	NC
73205	WFL	18	27	RALEIGH	NC
54963	WRDC	14	28	Raleigh-Durham	NC
64611	WRAZ	15	49	Raleigh-Durham	NC
22121	KBMY	17	17	BISMARCK	ND
55684	KXMA-TV	19	19	DICKINSON	ND
53315	KJRE	20	20	ELLENDALE	ND
61961	KVLY-TV	18	44	FARGO	ND
55372	KVRR	19	19	FARGO	ND



53320	KGFE	15	15	GRAND FORKS	ND
22127	KMCY	14	14	MINOT	ND
53313	KSRE	15	40	Minot-Bismarck-Dickinson	ND
55683	KXMD-TV	14	14	WILLISTON	ND
84453	KFXL-TV	15	15	LINCOLN	NE
47995	KXNE-TV	19	19	NORFOLK	NE
47974	KYNE-TV	17	17	OMAHA	NE
53903	KETV	20	20	OMAHA	NE
43952	WMBC-TV	18	18	NEWTON	NJ
55056	KTEL-CD	15	15	ALBUQUERQUE	NM
1151	KAZQ	17	17	ALBUQUERQUE	NM
35084	KLUZ-TV	16	42	Albuquerque-Santa Fe	NM
33819	KNBX-CD	14	14	LAS VEGAS	NV
67089	KINC	16	16	LAS VEGAS	NV
10498	KEEN-CD	17	17	LAS VEGAS	NV
66807	KHDF-CD	19	19	LAS VEGAS	NV
63768	KBLR	20	40	PARADISE	NV
10228	KNPB	15	15	RENO	NV
34577	KRNS-CD	18	46	RENO	NV
19191	KAME-TV	20	20	RENO	NV
167948	WFNY-CD	16	48	Albany-Schenectady-Troy	NY
13933	WYPX-TV	19	50	AMSTERDAM	NY
15569	WBGH-CA	20	20	BINGHAMTON	NY
67784	WNYO-TV	16	49	Buffalo	NY
14326	WBNF-CD	15	15	BUFFALO	NY
10132	WFFF-TV	16	43	Burlington	NY
15567	W16AX-D	16	16	ITHACA	NY
16744	WWNY-CD	18	18	MASSENA	NY
57476	WPTZ	14	14	PLATTSBURGH	NY
77515	WNMN	17	40	SARANAC LAKE	NY
70158	WVH-CD	18	50	SOUTHAMPTON	NY
40758	WSYT	14	19	Syracuse	NY
58725	WNYS-TV	15	44	Syracuse	NY
73113	WSYR-TV	17	17	SYRACUSE	NY
74151	WTVH	18	47	SYRACUSE	NY
21252	WSTM-TV	19	24	SYRACUSE	NY
53734	WCNY-TV	20	25	SYRACUSE	NY
72958	WBNX-TV	17	30	AKRON	OH
39738	WXIX-TV	15	29	Cincinnati	OH
65666	WCET	17	34	CINCINNATI	OH
11204	WSTR-TV	18	33	CINCINNATI	OH
46979	WLWT	20	35	CINCINNATI	OH
59441	WEWS-TV	15	15	CLEVELAND	OH
73195	WKYC	19	17	CLEVELAND	OH
66185	WOSU-TV	16	38	Columbus	OH
50781	WCMH-TV	14	14	COLUMBUS	OH
30244	WCLL-CD	19	19	COLUMBUS	OH
68549	WOHL-CD	15	35	Lima	OH
41892	WOHZ-CD	20	41	MANSFIELD	OH
1104	WMNO-CD	18	28	MARION	OH
35666	KTEN	17	26	ADA	OK

78322	KQCW-DT	20	20	MUSKOGEE	OK
84225	KOCM	16	46	Oklahoma City	OK
67999	KTBO-TV	15	15	OKLAHOMA CITY	OK
2566	KOPX-TV	18	50	OKLAHOMA CITY	OK
50182	KAUT-TV	19	40	OKLAHOMA CITY	OK
52425	KSJF-CD	19	50	POTEAU	OK
37099	KWHB	16	47	Tulsa	OK
31369	KUTU-CD	17	25	TULSA	OK
35464	KFXO-LD	15	39	Bend	OR
167799	KABH-CD	17	17	BEND	OR
166534	KOHD	18	18	BEND	OR
71070	KORY-CD	15	15	EUGENE	OR
35189	KMTR	17	17	EUGENE	OR
8257	K19GH-D	19	19	EUGENE, ETC.	OR
81447	KUNP	16	16	LA GRANDE	OR
71080	KOXO-CD	15	41	Portland	OR
71069	KORS-CD	16	16	PORTLAND	OR
71074	KOXI-CD	20	20	PORTLAND	OR
31437	KTVC	18	18	ROSEBURG	OR
61551	KPIC	19	19	ROSEBURG	OR
56971	KRHP-CD	14	14	THE DALLES	OR
68393	WJMB-CD	17	17	BUTLER	PA
66219	WPSU-TV	15	15	CLEARFIELD	PA
73879	WPHL-TV	17	17	PHILADELPHIA	PA
41314	WINP-TV	16	38	Pittsburgh	PA
68395	WBYD-CD	19	39	Pittsburgh	PA
73875	WPGH-TV	20	43	PITTSBURGH	PA
73318	WNEP-TV	16	50	Wilkes Barre-Scranton	PA
61573	WVEO	17	17	AGUADILLA	PR
60357	WOST	20	22	MAYAGUEZ	PR
19561	WECN	18	18	NARANJITO	PR
2175	WQTO	19	25	PONCE	PR
26681	WTIN-TV	14	15	Puerto Rico	PR
2174	WMTJ	15	16	Puerto Rico	PR
15320	WRUA	16	33	Puerto Rico	PR
50063	WPXQ-TV	17	17	BLOCK ISLAND	RI
416	WTAT-TV	17	24	CHARLESTON	SC
55203	WLCN-CD	18	18	CHARLESTON	SC
71297	WCSC-TV	19	47	CHARLESTON	SC
10587	WCBF-TV	20	50	CHARLESTON	SC
37176	WLTX	15	17	Columbia	SC
72300	WHNS	17	21	GREENVILLE	SC
61008	WJPM-TV	16	45	Myrtle Beach-Florence	SC
61064	KDSD-TV	17	17	ABERDEEN	SD
48660	KPRY-TV	19	19	PIERRE	SD
41969	KCLO-TV	16	16	RAPID CITY	SD
71353	WDSI-TV	14	40	Chattanooga	TN
52078	WPDP-LP	19	25	CLEVELAND	TN
52628	WPXK-TV	18	23	JELICO	TN
27501	WKPZ-CD	19	19	KINGSPORT	TN
19200	WTNZ	15	34	Knoxville	TN

168014	W50EA-D	15	50	Memphis	TN
30580	WPBM-CD	15	46	Nashville	TN
11117	WHTN	16	38	Nashville	TN
418	WZTV	20	15	NASHVILLE	TN
37808	WLFG	14	49	Tri-Cities	TN
77677	WAPK-CD	16	36	Tri-Cities	TN
62293	KXVA	15	15	ABILENE	TX
33722	KCIT	15	15	AMARILLO	TX
8523	KAMR-TV	19	19	AMARILLO	TX
48836	KXLK-CD	14	23	Austin	TX
35913	KHPL-CD	15	40	Austin	TX
38562	KGBS-CD	19	19	AUSTIN	TX
22589	KFDM	15	25	Beaumont-Port Arthur	TX
9754	KNCT	17	46	BELTON	TX
125710	KNIC-DT	18	18	BLANCO	TX
32179	KXFX-CD	20	20	BROWNSVILLE	TX
48833	KCRP-CD	17	41	CORPUS CHRISTI	TX
82910	KUQI	19	38	CORPUS CHRISTI	TX
49324	KERA-TV	14	14	DALLAS	TX
32621	KVAW	18	18	EAGLE PASS	TX
33716	KFOX-TV	15	15	EL PASO	TX
67760	KTSM-TV	16	16	EL PASO	TX
49832	KVIA-TV	17	17	EL PASO	TX
33764	KDBC-TV	18	18	EL PASO	TX
68753	KTFN	20	51	EL PASO	TX
81445	KPTF-DT	18	18	FARWELL	TX
51517	KTXA	18	29	FORT WORTH	TX
23422	KTVT	19	19	FORT WORTH	TX
34457	KGBT-TV	18	31	HARLINGEN	TX
62354	KTLM	14	40	Harlingen-Weslaco-Brownsville-McAllen	TX
56079	KMBH	16	38	Harlingen-Weslaco-Brownsville-McAllen	TX
51569	KTXH	19	19	HOUSTON	TX
51479	KLDO-TV	19	19	LAREDO	TX
70917	KFXK-TV	20	31	LONGVIEW	TX
53544	KPTB-DT	16	16	LUBBOCK	TX
69692	KNVO	17	49	MCALLEN	TX
86263	KUPB	18	18	MIDLAND	TX
13200	KUVM-CD	20	34	MISSOURI CITY	TX
53541	KMLM-DT	15	42	Odessa-Midland	TX
307	KSAN-TV	16	16	SAN ANGELO	TX
58560	KIDY	19	19	SAN ANGELO	TX
64969	KVDA	15	38	San Antonio	TX
27300	KHCE-TV	16	16	SAN ANTONIO	TX
35921	KHPM-CD	20	40	SAN MARCOS	TX
77452	KPCB-DT	17	17	SNYDER	TX
308	KTXS-TV	20	20	SWEETWATER	TX
55644	KYTX	15	18	Tyler-Longview	TX
73101	KAVU-TV	20	15	VICTORIA	TX
68538	KRHD-CD	15	40	Waco-Temple-Bryan	TX

6669	KBTX-TV	16	50	Waco-Temple-Bryan	TX
7675	KJTL	15	15	WICHITA FALLS	TX
11034	K20DN-D	20	20	WICHITA FALLS	TX
59494	KCSG	14	14	CEDAR CITY	UT
168495	KULX-CD	14	14	OGDEN	UT
6823	KBYU-TV	17	44	PROVO	UT
82576	KUES	19	19	RICHFIELD	UT
36607	KJZZ-TV	19	46	SALT LAKE CITY	UT
10177	KTMW	20	20	SALT LAKE CITY	UT
82585	KUEW	18	18	ST. GEORGE	UT
69532	WFDC-DT	15	15	ARLINGTON	VA
4688	WHSV-TV	20	49	HARRISONBURG	VA
168095	WLHG-CD	19	43	LYNCHBURG	VA
13060	WNLO-CD	14	45	Norfolk-Portsmouth-Newport News	VA
47401	WTKR	16	40	Norfolk-Portsmouth-Newport News	VA
71121	WKTD-CD	17	17	PORTSMOUTH	VA
71127	WAVY-TV	19	31	PORTSMOUTH	VA
9762	WGNT	20	50	PORTSMOUTH	VA
3113	WVXF	17	17	CHARLOTTE AMALIE	VI
2370	WSVI	20	20	CHRISTIANSTED	VI
46728	WCAX-TV	20	22	BURLINGTON	VT
53586	KBCB	19	19	BELLINGHAM	WA
62468	KCKA	19	19	CENTRALIA	WA
37444	KVBI-LP	17	42	CLARKSTON	WA
25358	KVVK-CD	15	15	KENNEWICK, ETC.	WA
56029	KEPR-TV	18	18	PASCO	WA
35862	KVOS-TV	14	35	Seattle-Tacoma	WA
49264	KFFV	16	44	Seattle-Tacoma	WA
34537	KHQ-TV	15	15	SPOKANE	WA
34868	KREM	20	20	SPOKANE	WA
71072	KORX-CD	16	16	WALLA WALLA	WA
2506	KAPP	14	14	YAKIMA	WA
12395	KNDO	16	16	YAKIMA	WA
86496	WTPX-TV	19	46	ANTIGO	WI
7893	WEAU	17	38	EAU CLAIRE	WI
2708	WGBA-TV	14	41	Green Bay-Appleton	WI
73042	WCWF	15	21	Green Bay-Appleton	WI
18780	WHLA-TV	15	30	La Crosse-Eau Claire	WI
10221	WMSN-TV	18	49	MADISON	WI
6870	WMTV	19	19	MADISON	WI
6096	WHA-TV	20	20	MADISON	WI
71422	WBME-CD	17	24	MILWAUKEE	WI
49699	WJFW-TV	16	16	RHINELANDER	WI
2711	WLWK-CD	19	22	STURGEON BAY	WI
33658	KBJR-TV	19	19	SUPERIOR	WI
74176	WVVA	17	46	BLUEFIELD	WV
73189	WLPX-TV	18	39	CHARLESTON	WV
65130	WQCW	15	17	Charleston-Huntington	WV
71657	WVPB-TV	20	34	HUNTINGTON	WV
68407	WJPW-CD	18	18	WEIRTON	WV
63177	KGWC-TV	14	14	CASPER	WY

18286	KTWO-TV	17	17	CASPER	WY
74256	KFNB	20	20	CASPER	WY