

COMCAST NBCUNIVERSAL

December 12, 2016

Senator Edward J. Markey
Suite SD-255
Dirksen Building
Washington, DC 20510-2107


Dear Senator Markey:

I am writing in response to your recent letter to Brian Roberts, Chairman and CEO of Comcast Corporation, and to follow up on our telephone conversation on December 2, 2016, in which you requested information about plans to ensure that the residents of the Boston Designated Market Area (DMA) continue to have reliable access to NBC's free, over-the-air service when it takes over the NBC Network affiliation in the Boston DMA on January 1, 2017, following the expiration of the affiliation agreement with WHDH. As we discussed, we are fully committed to bringing the very best NBC broadcast service to the residents of the Boston DMA, including the Network's top-ranked news, entertainment, and sports programming and the extensive, high-quality local news and public affairs programming for which the NBC owned stations are known.

While we are continuing to refine our plans, I have new, good news even since our telephone call. We have just entered into an agreement with another full-power Boston station (WMFP) to rebroadcast the NBC Boston signal on its available digital channel until we can acquire another full-power station in the market. As a result, NBC Boston will now deliver interference-free over-the-air service to approximately 275,000 more viewers in the Boston DMA than WHDH on January 1, 2017. To ensure that every viewer in the market can access the new NBC Boston, NBC has launched an extensive consumer outreach and education program, the details of which are provided below.

As we discussed, NBC's ultimate goal is to acquire another full-power television station in the Boston DMA to ensure full coverage of the market. Although NBC has conducted preliminary discussions with station owners in the market, those discussions had to be tabled when the "quiet period" mandated by the broadcast spectrum incentive auction commenced on January 12, 2016. Because the incentive auction is taking longer to conclude than anticipated, with Stage 4 commencing on December 13, station owners have been precluded from negotiating transactions for the last 11 months. Most observers anticipate that the auction will conclude during the first quarter of 2017, at which point NBC will be able to pursue an acquisition strategy. We are confident that a suitable full-power station will be available for purchase at the end of the auction. In the interim, NBC is taking extraordinary steps to cover the Boston market with three television broadcast stations, as described below, which are collectively referred to as "NBC Boston."

OVER-THE-AIR COVERAGE OF THE BOSTON DMA AS OF JANUARY 1, 2017¹

1. **Station WNEU**. NBC owns Station WNEU, which is licensed to Merrimack, NH, and assigned to the Boston DMA.² The station provides Telemundo programming and will air NBC Boston on an available digital channel. WNEU provides excellent over-the-air coverage of the northern portion of the Boston DMA, with its FCC-protected contour encompassing all or portions of Cheshire, Hillsborough, Rockingham, Merrimack, Sullivan,³ Belknap and Strafford Counties in New Hampshire and portions of Worcester, Middlesex, Suffolk, and Essex Counties in Massachusetts.
2. **Station WBTS**. WBTS is a low power television station licensed to Boston and acquired earlier this year by NBC. The station was operating in analog with minimal coverage when NBC contracted to acquire it. NBC has since constructed a new digital facility for WBTS, which transmits from a tall tower at the Needham Heights, MA, antenna farm, the same site that serves major full-power TV stations serving Boston, including WHDH. WBTS provides good over-the-air coverage to the Boston metro area, with its FCC contour encompassing all of Suffolk and Norfolk Counties and portions of Middlesex, Essex, Worcester, Plymouth, and Bristol Counties in Massachusetts and a portion of Providence County in Rhode Island.
3. **Station WMFP**. NBC has now entered into an agreement with a full-power television station in the market (WMFP) to rebroadcast WBTS on that station's available digital channel until NBC can acquire another full-power station in the Boston DMA. WMFP is also located at the Needham Heights antenna farm and provides coverage comparable to WHDH's coverage, except for an area to the south/southwest of Boston, largely in areas that are outside the Boston DMA (Hampden and Hampshire Counties in Massachusetts and areas in Connecticut and Rhode Island) and assigned, respectively, to the Springfield (MA), Hartford (CT), and Providence (RI) DMAs. Each of these areas is served over-the-air by the NBC station assigned to that particular DMA (WWLP, Springfield; WVIT, Hartford; and WJAR, Providence).

All three of the NBC Boston stations are currently providing over-the-air service in the Boston DMA. Both WNEU and WBTS are airing NBC's "Countdown Channel," which currently offers news and entertainment programming and allows viewers the opportunity to rescan their TVs or

¹ While NBC remains committed to providing reliable over-the-air service to the Boston DMA, it is worth noting that, according to Nielsen Media Research, the Boston DMA has the highest pay-TV penetration rate in the country (96.3% overall for cable, satellite and telco as of June 2016), and certain of the DMA counties (Barnstable, Nantucket, Dukes, Plymouth, and Merrimack) have 100% penetration rates.

² The Boston DMA consists of the following 16 counties: Suffolk, Essex, Middlesex, Norfolk, Plymouth, Worcester, Barnstable, Dukes, and Nantucket in Massachusetts; Belknap, Cheshire, Hillsborough, Merrimack, Rockingham, and Strafford in New Hampshire; and Windham in Vermont. Bristol County, MA, is assigned to the Providence DMA.

³ Sullivan County, NH, is assigned to the Burlington, VT-Plattsburgh, NY DMA.

set-top boxes now and add NBC Boston to their channel line-ups. NBC expects to launch NBC Boston on WMFP no later than December 31, 2016.

Outdoor Reception. NBC has determined the outdoor coverage to be provided by NBC Boston and WHDH by calculating the number of people residing within the Boston DMA⁴ who are predicted to receive interference-free over-the-air service.⁵ Using this most conservative FCC analysis of outdoor coverage, NBC Boston will deliver an interference-free signal to 274,597 more viewers within the Boston DMA than WHDH.

Interference-Free Coverage Comparison:

NBC Boston: 5,859,313
WHDH: 5,584,716
Net Gain: 274,597

Indoor Reception. Because indoor reception is highly dependent on the quality, location and orientation of specific TV receivers, the FCC has never promulgated or applied a standard for measuring indoor coverage. Nonetheless, NBC's engineering staff has evaluated predicted indoor reception of NBC Boston using the three signal strength values set forth below, which range from the most robust interference-free indoor reception to more typical interference-free indoor reception. In all three cases, NBC Boston will deliver interference-free indoor coverage to at least 231,645 more viewers in the DMA than WHDH based on the most robust reception standard.⁶

Comparison of Robust Indoor Reception (88 dBuV/m or Higher Predicted Field Strength):

NBC Boston: 4,216,087
WHDH: 3,984,442
Net Gain: 231,645

Comparison of FCC's Former Analog "City Grade" Coverage Equivalent (80 dBuV/m or Higher Predicted Field Strength):

⁴ Note that the FCC uses populations rather than households in determining coverage.

⁵ NBC's engineering staff based this study on output from the FCC's TVStudy 2.02 software (April 2016) and station technical data from the FCC's LMS database dated September 22, 2016. The FCC's TVStudy program counts the population within a station's noise-limited contour, the population within the contour that is not obstructed by terrain and the remaining population that does not receive interference from other stations to calculate the total interference-free population.

⁶ Population counts show the number of people predicted to receive signal levels equal to or above these field strengths within the protected contour of the station or group of stations.

NBC Boston: 4,670,186
WHDH: 4,355,035
Net Gain: 315,151

Comparison of "Typical" Indoor Coverage (75 dB μ V/m or Higher Predicted Field Strength):

NBC Boston: 4,875,921
WHDH: 4,572,937
Net Gain: 302,984

EDUCATION CAMPAIGN

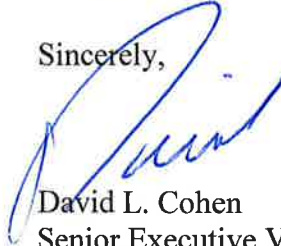
NBC Boston is being launched with an extensive multimedia communications campaign designed to educate viewers about where to find the strongest over-the-air NBC signal in their area and the placement of NBC Boston on cable and satellite systems serving the Boston area. This campaign includes the following elements:

- An ongoing multi-million dollar advertising campaign is educating the public about the transition via newspapers, permanent and mobile billboards, radio spots, online digital ads (including a takeover of BostonGlobe.com on January 3), and cable television advertising. This is an extensive media campaign with complete takeovers of billboards in North and South MTA Stations. Over 100 coffee cafes will feature NBC Boston-branded coffee-cup sleeves. On January 1 and 8, the Boston Globe will be fully wrapped in NBC Boston-related information and will offer two-and-a-half pages of transition information, including channel finders (both over-the-air and cable). Area malls will offer digital advertising explaining the transition, and on-air talent will visit local malls for five days beginning December 16 to provide information and answer questions. Well-known NBC talent, such as Lester Holt, Jimmy Fallon, Seth Meyers, and the cast of the *Today Show*, appear in much of the campaign.
- Informational postcards have been direct-mailed to approximately 100,000 households comprised of likely over-the-air viewers informing them of the need to rescan their TV sets to locate the new channels.
- A third-party Contact Center has been retained to answer and log viewers' questions about the transition. (855-NBC-BOSTON 855-622-2678)
- The NBCBOSTON.COM website (<http://www.nbcboston.com/>) offers detailed FAQs and provides a phone number to call with questions or concerns.
- NBC Boston is reaching out directly to individuals via email and telephone to answer viewer inquiries logged directly by NBC Boston or our Contact Center.
- An informational rescan video has been produced and will appear on NBCBOSTON.COM explaining how over-the-air viewers can rescan their TVs and receive NBC Boston.

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Based on the foregoing, we believe the Boston DMA will be very well served by the new NBC Boston, which will expand interference-free NBC service to approximately 275,000 more over-the-air viewers. Given the vagaries of radiofrequency signal propagation and the need to rescan receivers and set-top boxes, we nevertheless expect there will be some viewers who will experience difficulties receiving or finding the NBC Boston signal. NBC is committed to reaching out to each such viewer with assistance, and I reiterate my commitment to you that we will continue to work on ways to improve coverage in the Boston area.

Sincerely,



David L. Cohen
Senior Executive Vice President

DLC:jlj