

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Promoting Diversification of Ownership)	MB Docket No. 07-294
In the Broadcasting Services)	
)	
2006 Quadrennial Regulatory Review – Review)	MB Docket No. 06-121
of the Commission’s Broadcast Ownership Rules)	
and Other Rules Adopted Pursuant to Section)	
202 of the Telecommunications Act of 1996)	
)	
2002 Biennial Regulatory Review – Review of the)	MB Docket No. 02-277
Commission’s Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
the Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	MM Docket No. 01-235
Newspapers)	
)	
Rules and Policies Concerning Multiple)	MM Docket No. 01-317
Ownership of Radio Broadcast Stations in Local)	
Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244
)	
Ways to Further Section 257 Mandate and To)	MB Docket No. 04-228
Build on Earlier Studies)	

To: The Commission

**REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

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**REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

I. Introduction and Summary

The National Association of Broadcasters (NAB)¹ submits this reply to certain comments on the Commission's *Third Further Notice of Proposed Rulemaking (Notice)* in this proceeding.² NAB reiterates its support for initiatives that will help bring new and diverse voices into the broadcast industry. As we noted in our initial comments, "a diverse broadcast industry is a healthy broadcast industry that benefits everyone including the listening public." To that end, NAB is eager to work with the Commission and other interested parties to create a framework of public/private partnerships that addresses the most pressing needs of aspiring broadcasters, including access to capital, education, and facilities.

NAB believes the Commission can develop initiatives that help promote minority and female ownership and participation in the media industries consistent with constitutional constraints and without creating adverse consequences for broadcasters generally. As discussed in our initial comments, NAB supports many of the proposals offered by the Diversity and Competition Supporters (DCS) and the Commission in the *Notice*. NAB is concerned, however, that some proposals may have unintended consequences that could stifle growth in broadcasting, particularly as both radio and television stations migrate into the digital age. The move to digital will present a number of opportunities for new entrants in broadcasting if entrepreneurs are allowed to be creative

¹ NAB is a nonprofit trade association that advocates on behalf of more than 8,300 free, local radio and television stations and also broadcast networks before Congress, the Federal Communications Commission, the Courts, and other federal agencies.

² *Third Further Notice of Proposed Rule Making* in MB Docket Nos. 07-294, 06-121, 02-277 and 04-228, and MM Docket Nos. 01-235, 01-317, and 00-244 (rel. March 5, 2008) (*Notice*).

and flexible. To avoid unnecessarily reducing options, the Commission should refrain from adopting proposals that limit the ways in which broadcasters can develop digital broadcasting. Just as diversity is important for a healthy broadcast industry, the opposite is true as well: a healthy industry is necessary to ensuring opportunities for diverse voices and new entrants. As explained in detail below, the reallocation of television channels 5 and 6 and overly restrictive share-time proposals would produce adverse consequences for broadcasters in the digital environment.

In these replies, NAB also responds to certain claims and arguments made by commenters that are both false and irrelevant to the instant proceeding. For example, NAB addresses below arguments made by certain parties that attempt to undermine the rationale for the must-carry regime entirely, not just as applied to Class A broadcast stations. While NAB does not take a position on Class A must-carry, NAB opposes misplaced arguments that have repeatedly been rejected by the Commission and the courts. Further, NAB opposes any backdoor attempts to attack the FCC's recent ownership decision in this proceeding.

II. The Commission Should Not Reallocate TV Channels 5 and 6 for FM Service

NAB agrees with the commenters³ who oppose the proposal by the Broadcast Maximization Committee (BMC) to reallocate TV channels 5 and 6 for use by Low Power FM (LPFM) and Noncommercial Educational (NCE) FM and AM broadcast radio services.⁴

³ See Comments of ABC, Inc. in MB Docket Nos. 07-294 *et al.* (filed Jul. 30, 2008); Comments of the Association for Maximum Service Television in MB Docket Nos. 07-294 *et al.* (filed Jul. 30, 2008) (MSTV Comments) (incorporating by reference MSTV's previous filings in MM Docket No. 87-268); Comments of Withers Broadcasting in MB Docket Nos. 07-294 *et al.* (filed Jul. 30, 2008).

⁴ See Comments of the Broadcast Maximization Committee in MB Docket Nos. 07-294 *et al.* (filed Jul. 30, 2008) (BMC Comments).

While this latest proposal differs in some respects from those made earlier,⁵ its harmful impact on the digital television (DTV) transition is much the same.

The Association for Maximum Service Television, Inc. (MSTV) offers compelling and specific reasons as to why channel 5 and 6 reallocation proposals should be rejected by the Commission.⁶ The Commission in fact took such action almost six months ago, following extensive consideration in the DTV proceeding.⁷ As pointed out by MSTV, reallocating TV channels 5 and 6 would disrupt the operations of both full and low-power television stations (LPTVs), would seriously jeopardize the carefully crafted DTV table of allotments and would reduce the possibilities for protecting 175 new DTV allotments, as required by the Community Broadcasters Protection Act of 1999. We agree that the disruption to DTV services would be substantial. Moreover, reallocation is not a simple matter. For example, BMC's proposal to move WPVI-DT in Philadelphia requires reallocation of *three* television stations, and is contingent upon a separate channel change request.⁸

NAB emphasizes here the flawed nature of one of the principal assumptions behind BMC's proposal, that since there will only be a "... few remaining Ch. 5/6 TV stations"⁹ after the completion of the DTV transition, channels 5 and 6 are ripe for reallocation. In fact, it is

⁵ See, e.g., Petition for Reconsideration filed by Mullaney Engineering, dated October 26, 2007, in MM Docket No. 87-268 (where re-allocation of channels 5 and 6 is proposed to allow for "...re-farming of the FM spectrum (to eliminate short spacings or establish a digital-only band)" or to allot contiguous channel blocks for use by FM translators or LPFM stations).

⁶ See MSTV Comments at 1-8.

⁷ *Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order*, MM Docket 87-268, 23 FCC Rcd 4220, at ¶¶ 24-27 (rel. Mar. 6, 2008).

⁸ See BMC Comments at 11.

⁹ *Id.* at 3.

impossible at this point to know the extent to which DTV stations, not to mention Low Power Television Stations and TV translators, will need to utilize channels 5 and 6 post-transition. The reallocation of the television spectrum for the completion of the DTV transition has been a long and complicated process. As operations on the final DTV channel assignments begin, associated with the turnoff of full-power analog services, there will likely be additional channel changes needed in certain circumstances as stations experience real interference situations that may not have been apparent from predictive modeling. By reallocating channels 5 and 6 out of the TV band, the pool of alternate channels available to mitigate egregious DTV interference situations would be reduced, potentially eliminating the best channels to solve the interference problems and thus potentially risking loss of DTV service to viewers in those areas.

Further, while BMC's proposal suggests possible new locations for full-power channel 5 and 6 stations, it neglects to address the effect on the over 250 Class A, low power and translator TV stations which utilize these channels. See Attachment A. Also, the Commission has just issued a rulemaking on whether to suspend broadcast auxiliary operations, including wireless microphones, in the 700 MHz band.¹⁰ It may be necessary for stations operating such services in TV channels 52-69 to relocate services to channels 5 and 6. The BMC proposal thus completely ignores many service providers already operating or likely to be operating on channels 5 and 6.

Even if channel adjustments could be made that theoretically would satisfy all incumbent television operations (which is a virtual impossibility), the substantial cost of relocation expenses, for which no plan has been proposed, makes this reallocation

¹⁰ *In the Matter of Revisions to Rules Authorizing the Operation of Low Power Auxiliary Stations in the 698-806 MHz Band, et al.*, Notice of Proposed Rulemaking, WT Docket Nos. 08-166 and 08-167 (rel. Aug. 21, 2008).

proposal totally impractical. As pointed out by Withers Broadcasting,¹¹ television broadcasters have made decisions and bought equipment based on established Commission decisions in the DTV proceeding to maintain channels 5 and 6 in the television band. It is untenable to now consider requiring those broadcasters to foot the bill for such a late reversal in regulatory course. Without an identified source for funding the engineering, purchase and installation of new equipment for incumbent broadcasters, reallocation proposals are neither reality-based nor viable.

Nor is it remotely practical to require all Americans to obtain new radio receivers to listen to relocated LPFM and other radio services. Frequencies below 87.5 MHz, the majority of the spectrum identified by BMC, cannot be tuned into by the over one billion radio receivers currently in the consumer marketplace. And contrary to assertions made by Educational Media Foundation (EMF) *et al.*, most receivers cannot tune between 87.5 MHz and the current FM band.¹² The examples cited by EMF, two portable "world" radios, comprise only a small fraction of the receivers in use; the vast majority of receivers both originally equipped and aftermarket for automobiles, component hi-fi, portable, and table radios will *not* be able to receive 87.5 and 87.7 MHz, and only some but not all will receive 87.9 MHz. Thus, reallocating LPFM and other radio services will require a complete receiver redesign.

For the above-mentioned reasons, the Commission should reject any proposals to reallocate radio services to the television band.

¹¹ See Comments of Withers Broadcasting in MB Docket Nos. 07-294, *et al.* (filed Jul. 30, 2008) at 2-3.

¹² See Comments of Educational Media Foundation, *et al.*, in MB Docket Nos. 07-294, *et al.* (filed Jul. 30, 2008) at 14.

III. Share-Time Proposals Show Promise But Must Not Be Unduly Restricted

NAB agrees that DTV subchannels and HD Radio secondary channels can provide a boost to media diversity. NAB strongly supports proposals that will allow and encourage broadcasters to develop secondary channels fully. The “share-time” proposal suggested by DCS and discussed by the Commission in the *Notice* at ¶ 87 could be a creative way to increase opportunities for new owners in the broadcast industry. As a nascent marketplace, secondary channels could provide an economical alternative for new broadcasters seeking entry into the industry. After the transition to digital television is complete next year, NAB expects that secondary channels in television could provide an exciting new platform for diverse and niche programming. Likewise, as radio listeners continue to migrate to digital radio, HD radio streams will rise in popularity and offer music and other formats not currently represented on the radio dial.

Undue restrictions on the share-time idea, however, will almost certainly doom it to failure. DCS has suggested that broadcasters be restricted to selling secondary channels only to Socially and Economically Disadvantaged Businesses (SDBs) first and only at a “fraction of market value.”¹³ NAB cannot support these restrictions, as they are unnecessary and harmful to the marketplace and to the goal of promoting new entrants. Restricting the first sale of a secondary channel eliminates much needed flexibility for a service that has not yet been established in the market. The competitive viability of these secondary channels is still unknown. Preventing broadcasters from experimenting in the marketplace by severely limiting the pool of potential partners will stifle the growth of digital multicasting. Moreover, requiring broadcasters to sell secondary channels at well below

¹³ See Comments of the Diversity and Competition Supporters in MB Docket Nos. 07-294 *et al.* (filed Jul. 30, 2008) at 14.

market value will disincent broadcasters from selling any secondary channels at all, thereby preventing new entrants from obtaining such channels. NAB encourages the Commission to carefully consider the possible unintended consequences of this proposal and suggests that it may be more fruitful to find ways to incent share-time proposals as a means of fostering greater diversity.

IV. The Commission Should Ignore Repetitive and Inaccurate Arguments Not Properly Raised in This Proceeding

Some cable industry commenters addressed the merits of mandatory carriage rights for Class A television stations.¹⁴ Although NAB does not take a position on this issue, NAB opposes the comments of cable operators to the extent that they use the Class A carriage question as an opportunity to raise irrelevant arguments regarding mandatory carriage of full power television broadcast stations. These misplaced, recycled arguments have been repeatedly considered and rejected by the Commission and the courts, and should be given no attention in the instant proceeding.

Cablevision contends that the factual predicate underlying the must-carry statute is no longer viable. Specifically, Cablevision contends that because of changes to the multichannel video programming distribution (MVPD) market, including new MVPD offerings by direct broadcast satellite providers as well as Verizon and AT&T, the justifications accepted by the Supreme Court in the past would be deemed inadequate today.¹⁵ Time Warner echoes this, asserting that today's MVPD market is one of "vibrant

¹⁴ See, e.g., Comments of Cablevision Systems Corp. in MB Docket No. 07-294 *et al.* (filed Jul. 30, 2008); Comments of Time Warner Cable, Inc. in MB Docket No. 07-294 *et al.* (filed Jul. 30, 2008).

¹⁵ See Comments of Cablevision Systems Corp. in MB Docket No. 07-294 (filed Jul. 30, 2008) at 3, 11-13.

competition,” so it is therefore “not plausible” for cable operators to engage in anticompetitive conduct vis-à-vis broadcasters.¹⁶

Only a few months ago, the Commission rejected nearly identical arguments by the cable industry, explaining that “to the extent cable operators’ arguments about market power are meant to suggest that they no longer represent the threat to free, over-the-air broadcasting that drove the *Turner* decisions, the evidence convinces us otherwise.”¹⁷ The evidence cited by the Commission includes the fact that “the cable industry by far remains the dominant player in the MVPD market, commanding approximately 69 percent of all MVPD households,” that the percentage of households reliant upon over-the-air broadcast signals has declined from 40 to 14 percent, and that between 1995 and 2006, the market shares for ad-supported cable channels and broadcast stations have essentially swapped (i.e., cable channels’ day share increased from 28 to 49.5 percent, while the total day share of ABC, CBS, and NBC affiliates shrunk from 44 to 23.5 percent).¹⁸ The Commission also cited dramatic increases in regional clustering and horizontal concentration within the cable industry since 1992, as well as cable’s entry into the local advertising market.¹⁹ Based on its analysis of the marketplace, the Commission concluded that “cable operators have even greater incentives today” to discriminate against broadcast signals than they did when Congress adopted mandatory carriage obligations.²⁰ There is no reason for the Commission to revisit the very same contentions

¹⁶ Comments of Time Warner Cable, Inc. in MB Docket No. 07-294 (filed Jul. 30, 2008) at 12-13.

¹⁷ *Carriage of Digital Television Broadcast Signals: Amendment to Part 76 of the Commission’s Rules*, 22 FCC Rcd 21064, 21087 ¶ 49 (2007).

¹⁸ *Id.*

¹⁹ *Id.* at 21087-90, ¶¶ 50-52.

²⁰ *Id.* at 21090, ¶ 52.

by cable operators in the instant proceeding, especially when none of the relevant evidence has changed and mandatory carriage of full power television stations is not at issue in this proceeding. In any event, the Commission has no authority to alter the statutorily-mandated must-carry regime for full-power stations, regardless of any claims made by MVPDs.

The Commission should also ignore any suggestion that it can or should revisit recent ownership decisions in the context of this proceeding.²¹ Challenges to those decisions are pending in the courts and the FCC lacks jurisdiction to revisit them here. In any event, while some parties would have the Commission assume that rules permitting common ownership of broadcast facilities necessarily decrease opportunities for minorities and women,²² evidence in the ownership docket demonstrates that such assumptions are inaccurate and not supported by empirical evidence.²³

²¹ See, e.g., Comments of Office of Communication of the United Church of Christ, Inc., *et al.*, MB Docket Nos. 07-294, *et al.*, at 4-5 (filed Jul. 30, 2008) (“Indeed, given the considerable evidence that increased consolidation has hurt minority and women’s representation among broadcast owners, the Commission’s decision to issue the 2007 *Ownership Order* and relax the newspaper-broadcast cross ownership rule before establishing policies to monitor and foster ownership among these underrepresented groups cannot be considered reasonable or logical.”).

²² See Comments of Hispanic Info. and Telecomm. Network, Inc., MB Docket Nos. 07-294, *et al.*, at 3 (filed Jul. 30, 2008) (“The tragedy of media consolidation is that it has made it more and more difficult for independent voices to be heard. Mergers and brand extensions have increasingly consumed limited capacity in electronic media.”).

²³ See, e.g., NAB Reply Comments in MB Docket No. 06-121 at 33-38 (filed Nov. 1, 2007); Opposition of the National Association of Broadcasters to Petition for Reconsideration in MB Docket No. 06-121 at 22-24 (filed May 6, 2008) (“NAB previously pointed out that comments filed by the Center for Regulatory Effectiveness (CRE) showed that claims by Consumers Union, Consumer Federation of America and Free Press that common ownership leads to reduced minority and female ownership were not supported even by the data submitted by these parties.”).

V. FCC Form 323 Should Continue to be Filed Biennially

As indicated in its initial comments, NAB generally does not oppose the changes to the FCC Form 323 proposed in the *Notice*. We note that DCS contends that the FCC Form 323 should be filed annually.²⁴ However, the *Notice* in this proceeding does not seek comment on changing the requirement from a biennial to an annual requirement, nor does it ask any questions about or offer any rationale for altering the frequency of ownership report filings. Even assuming a change from a biennial to an annual report was properly noticed under the requirements of the Administrative Procedures Act,²⁵ the Commission should not reverse its ten-year-old determination that these reports should be filed every two years.²⁶ The Commission's current biennial filing requirement reflects a reasonable balance between ensuring that the Commission and the public have necessary information regarding station ownership and imposing heavy paperwork burdens on licensees. And beyond the biennial filing requirement, licensees must also file ownership reports following the transfer of control or assignment of a license, thereby ensuring that the Commission and the public have up-to-date ownership information. No justification has been presented that would justify doubling the paperwork burden by reverting to an annual filing requirement.

²⁴ See Comments of the Diversity and Competition Supporters in MB Docket Nos. 07-294 *et al.* at 18, 19 (filed Jul. 30, 2008).

²⁵ See 5 U.S.C. 553(b).

²⁶ See *1998 Biennial Regulatory Review—Streamlining of Mass Media Applications, Rules, and Processes*, Report and Order, 13 FCC Rcd 23056, 23094 ¶ 94 (holding that change from annual to biennial filing would “ease the paperwork burden on licensees without impairing the public's ability to ascertain the ownership of broadcast stations”).

VI. Conclusion

While NAB continues to believe that many of the proposals contained in the *Notice* could promote minority and female broadcast ownership, the Commission must avoid the adoption of measures with unintended adverse consequences for broadcasters in the digital age. NAB is eager to work with the Commission and other commenters to develop and implement the most effective initiatives.

Respectfully submitted,

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Attachment A

Class A, Low Power and Translator TV stations licensed to TV channels 5 and 6 (source: Stations licensed by the Federal Communications Commission, January 23, 2008)

No.	City	State	Ch. 5	Ch. 6
1	Florence	AL	✓	
2	Phenix City	AL		✓
3	Anchorage	AK		✓
4	Atmautluak	AK	✓	
5	Chuathbaluk	AK		✓
6	Circle Hot Springs	AK		✓
7	Clarks Point	AK		✓
8	Delta Junction	AK	✓	
9	Dillingham	AK	✓	
10	Eagle Village	AK	✓	
11	Emmonak	AK	✓	
12	Girdwood	AK	✓	
13	Glenallen	AK	✓	
14	Healy	AK		✓
15	Juenauy-Douglas	AK	✓	
16	Kenai	AK		✓
17	Long Island	AK	✓	
18	Manley Hot Springs	AK		✓
19	Mendenhall Valley	AK		✓
20	Minchumina	AK	✓	
21	Minto	AK	✓	
22	Platinum	AK	✓	
23	Sitka	AK	✓	
24	Sparrevohn	AK	✓	
25	Flagstaff/Doney Park	AZ		✓
26	Holbrook	AZ		✓
27	Prescott	AZ		✓
28	Yuma	AZ		✓
29	El Dorado	AK	✓	
30	Barstow	CA		✓
31	Bieber	CA		✓
32	Big Bear Lake	CA		✓
33	Burney	CA	✓	
34	Chico	CA		✓
35	Dunsmuir	CA	✓	
36	Fort Jones	CA		✓
37	Green Point	CA	✓	
38	Hayfork	CA	✓	
39	Hopland	CA		✓
40	Indio	CA		✓
41	Lake City	CA		✓
42	Lewiston	CA		✓
43	Likely	CA	✓	
44	Long Valley	CA	✓	
45	Mineral	CA	✓	
46	Newberry Springs	CA		✓
47	Paradise	CA	✓	
48	Potter Valley	CA		✓
49	Redding	CA		✓
50	Ridgecrest	CA	✓	
51	Weaverville	CA	✓	
52	Yreka	CA		✓
53	Aspen	CO		✓
54	Banty Point	CO	✓	
55	Basalt	CO	✓	
56	Buford	CO	✓	
57	Cimarron	CO		✓
58	Collbran	CO		✓
59	Cortez	CO		✓
60	Del Norte	CO		✓
61	Divide Creek	CO		✓
62	Dolores	CO		✓
63	East Elk Creek	CO		✓
64	Glenwood Springs	CO	✓	
65	Glenwood Springs	CO		✓
66	Hayden	CO		✓

No.	City	State	Ch. 5	Ch. 6
67	Ismay Canyon	CO	✓	
68	Jacks Cabin	CO	✓	
69	Leadville	CO	✓	
70	Manitou Springs	CO		✓
71	Meeker	CO		✓
72	New Castle	CO	✓	
73	Norwood	CO		✓
74	Oak Creek	CO		✓
75	Ouray	CO	✓	
76	Paonia	CO		✓
77	Pitkin	CO	✓	
78	Rangely	CO		✓
79	Redstone	CO		✓
80	Salida	CO		✓
81	San Luis & Rural	CO		✓
82	Sargents	CO		✓
83	Southwest Baca Count	CO		✓
84	Steamboat Springs	CO		✓
85	Thomasville	CO	✓	
86	Weber Canyon	CO	✓	
87	Key West	FL	✓	
88	Sarasota	FL	✓	
89	Sebring	FL	✓	
90	Clayton	GA		✓
91	Dalton	GA		✓
92	Hanamaulu	HI		✓
93	Hilo	HI	✓	
94	Cambridge	ID	✓	
95	Challis	ID	✓	
96	Coolin	ID	✓	
97	Council	ID	✓	
98	Driggs	ID	✓	
99	Fairfield	ID	✓	
100	Glenns Ferry	ID	✓	
101	Kooskia & Sites	ID	✓	
102	Lehmi	ID	✓	
103	McCall	ID	✓	
104	Terrace Lakes	ID	✓	
105	Evansville	IN	✓	
106	Princeton	IN		✓
107	Junction City	KS		✓
108	Salina	KS		✓
109	Wichita	KS	✓	
110	Lebanon	KY		✓
111	Starkville	MI	✓	
112	Branson	MO	✓	
113	Carthage	MO	✓	
114	Absarokee	MT	✓	
115	Broadus	MT		✓
116	Brusett	MT		✓
117	Circle	MT		✓
118	Conrad	MT		✓
119	Emigrant	MT	✓	
120	Ferndale	MT		✓
121	Hinsdale	MT	✓	
122	Hot Springs	MT	✓	
123	Howard	MT		✓
124	Lake McDonald	MT	✓	
125	Miles City	MT		✓
126	Plains & Paradise	MT	✓	
127	Poplar	MT	✓	
128	Roundup	MT		✓
129	Ryegate	MT		✓
130	Saco	MT		✓
131	St. Regis	MT	✓	
132	Sula	MT	✓	

No.	City	State	Ch. 5	Ch. 6
133	White Sulphur Spring	MT		✓
134	Winnett	MT		✓
135	Wolf Point	MT		✓
136	Broken Bow	NE		✓
137	Chadron	NE		✓
138	Crawford	NE		✓
139	South Sioux City	NE	✓	
140	Cooper Canyon	NV		✓
141	Dayton	NV		✓
142	Elko	NV	✓	
143	Elko	NV		✓
144	Ely	NV		✓
145	Gabbs	NV		✓
146	Manhattan	NV		✓
147	Mina	NV	✓	
148	Orovada	NV		✓
149	Panaca	NV		✓
150	Ryndon	NV		✓
151	Smith	NV	✓	
152	Verdi	NV		✓
153	Walker Lake	NV		✓
154	Yerington	NV		✓
155	Abiquiu	NM		✓
156	Conchas Dam	NM		✓
157	Grants	NM		✓
158	Hillsboro	NM		✓
159	Mora	NM		✓
160	Penasco	NM		✓
161	Roy	NM		✓
162	Taos	NM		✓
163	Tohatchi	NM		✓
164	Wagon Mound	NM		✓
165	Binghamton	NY		✓
166	Elmira, Watkins Glen	NY		✓
167	Greece/Rochester	NY		✓
168	Hornell	NY		✓
169	New York	NY		✓
170	Bat Cave	NC	✓	
171	Bat Cave	NC		✓
172	Brasstown	NC	✓	
173	Bryson City	NC	✓	
174	Cherokee	NC	✓	
175	Franklin	NC		✓
176	Maggie Valley	NC		✓
177	Marion	NC		✓
178	Morehead City	NC	✓	
179	Oteen/Warren	NC		✓
180	Sapphire Valley	NC		✓
181	Spruce Pine	NC		✓
182	Tryon	NC	✓	
183	Wanchese	NC		✓
184	Astoria	OR	✓	
185	Black Butte Ranch	OR	✓	
186	Lakeview	OR	✓	
187	Mapleton	OR	✓	
188	Oxbow	OR		✓
189	Portland	OR	✓	
190	Prairie City-Unity	OR	✓	
191	Scottsburg	OR		✓
192	Severance Ranch	OR		✓
193	The Dalles	OR		✓
194	Tillamook	OK	✓	
195	Williamsport	PA	✓	
196	Pickens	SC	✓	
197	Alexandria	TN		✓
198	Chattanooga	TN		✓

No.	City	State	Ch. 5	Ch. 6
199	Selmer	TN		✓
200	Abilene	TX	✓	
201	Brady	TX	✓	
202	Clear Lake City	TX	✓	
203	Lufkin	TX	✓	
204	Rio Grande City	TX		✓
205	Antimony	UT	✓	
206	Bluff	UT		✓
207	Cane Beds, AZ/Hilldal	UT		✓
208	Cedar Canyon	UT		✓
209	Cedar City	UT	✓	
210	East Price	UT	✓	
211	Enterprise	UT	✓	
212	Escalante	UT	✓	
213	Fish Lake Resort	UT		✓
214	Green River	UT	✓	
215	Henefer	UT		✓
216	Kanab	UT	✓	
217	Kanarraville	UT		✓
218	Koosharem	UT		✓
219	Loa	UT		✓
220	Long Valley Junction	UT		✓
221	Manila	UT	✓	
222	Marysvale	UT	✓	
223	Mexican Hat	UT		✓
224	Minersville	UT	✓	
225	Montezuma Creek-Anet	UT	✓	
226	Navajo Mtn. Sch.	UT		✓
227	Oljeto	UT	✓	
228	Oljeto	UT		✓
229	Orderville	UT	✓	
230	Panguitch	UT	✓	
231	Richfield	UT		✓
232	Rockville	UT	✓	
233	Scipio, Holden	UT		✓
234	Spring Glen	UT		✓
235	Teasdale, Torrey	UT	✓	
236	Ticaboo	UT	✓	
237	Toquerville	UT	✓	
238	Tropic	UT	✓	
239	Wanship	UT		✓
240	Chesapeake	VA	✓	
241	Roanoke	VA	✓	
242	Chelan Butte	WA	✓	
243	Oroville	WA		✓
244	Sunnyside & Prosser	WA	✓	
245	Trout Lake	WA	✓	
246	Winton	WA	✓	
247	Eau Claire	WI		✓
248	Whiting	WI		✓
249	Casper	WY		✓
250	Clarks Fork	WY		✓
251	Cora	WY	✓	
252	Diamond Basin	WY	✓	
253	Encampment	WY		✓
254	Gillette	WY		✓
255	LaBarge & Big Piney	WY		✓
256	Manderson	WY		✓
257	Rock River	WY		✓
258	Shendan	WY		✓
259	South Fork	WY		✓
260	Sunlight Basin	WY	✓	
261	Thayne	WY	✓	
262	Wood River	WY		✓