ALLOCATION HEARING EXHIBIT 6003

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Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of	)	
Distribution of the	)	**Docket No. 14-CRB-0010-CD (2010-13)**
2010, 2011, 2012, and 2013 Cable Royalty Funds	)	

DIRECT TESTIMONY OF

JONDA K. MARTIN

DECEMBER 22, 2016

ALLOCATION HEARING EXHIBIT 6003

DIRECT TESTIMONY OF JONDA K. MARTIN

I. BIOGRAPHICAL INFORMATION

My name is Jonda K. Martin. I am the President of Cable Data Corporation ("CDC"), which is located in Mount Airy, Maryland. In my more than 25 years at CDC, I have been actively involved in all aspects of the company, including research, data entry, report generation, and administration. I received a Bachelor of Science/Business Administration degree from American University in Washington, D.C., with concentrations in international business and management of information systems. I also received an MBA from University of Maryland. I have previously testified before the Copyright Arbitration Royalty Panel ("CARP") regarding CDC's operations in connection with the CARP's distribution of 1998 and 1999 cable compulsory license royalties, and before the Copyright Royalty Judges ("Judges") in connection with Phase I and Phase II proceedings regarding the distribution of the 2000-2003 cable royalty funds, a Phase I proceeding regarding the distribution of the 2004 and 2005 cable royalty funds, and a Phase II proceeding regarding the 2004-2009 cable and 1999-2009 satellite royalty funds.

II. PURPOSE OF TESTIMONY

The purpose of my testimony is to provide the Judges with an overview of CDC's operations and describe its data collection process and methodologies in relevant detail. I will describe the carriage data that CDC supplied to Program Suppliers in connection with this proceeding, which I understand were utilized by Dr. Martin Frankel and Dr.

Jeffrey S. Gray in their sample selection and analyses, and by Howard Horowitz in connection with Program Suppliers' cable operator survey. I will also describe the local county analysis that CDC performed for Program Suppliers in connection with this proceeding, which I understand was provided to Nielsen.

III. CABLE DATA CORPORATION

CDC was established in 1979 to collect and analyze information on Statements of Account ("SOAs") that cable systems file with the Licensing Division of the Copyright Office ("Licensing Division"). CDC makes the collected information available to users by purchase, either on an as needed basis or by subscription. CDC is the only company providing such a service. Numerous parties involved in the cable and satellite industries rely on data collected by CDC. This is particularly true for parties involved in copyright compulsory license proceedings. As a result, CDC data have been presented over the years to the Copyright Royalty Tribunal, the CARP, and the Judges in virtually all of the cable and satellite copyright royalty distribution proceedings and rate adjustment proceedings. In this section of my testimony, I will provide an overview of CDC's operations and its data collection methodologies.

Data collection is an integral part of CDC's operations. CDC has two full-time employees who spend the vast majority of each work day on-location in the Licensing Division of the Copyright Office. Those employees record data and other information from each publicly-available, filed SOA on laptop computers.[1] The employees return to

[1] Once SOAs are filed at the Copyright Office they are subject to review by the Licensing Division before they are made available for public inspection. The Licensing Division's initial

CDC's office periodically to transfer the data collected at the Copyright Office on laptops to CDC's HP3000 minicomputer. Once the data are transferred to CDC's minicomputer, CDC produces standard reports and customized reports which summarize the SOA data. To keep CDC data as consistent as possible with the SOAs on file with the Licensing Division, CDC performs regular system updates to account for modifications made to a system's filing, for reasons such as additional royalty payments and refunds issued by the Licensing Division.

After the SOA data is entered in CDC's computer system, CDC produces both standardized and customized reports of aggregated cable system data for its clients. Both CDC's standardized and customized reports are derived from the same database and rely on the same CDC data protocols.

IV. CDC CARRIAGE DATA PROVIDED TO PROGRAM SUPPLIERS IN CONNECTION WITH THEIR CABLE OPERATOR SURVEY

A. CDC Data Supplied Prior to Sample Selection

In early 2011, at Program Suppliers' request, CDC provided a data report of all publicly-available SOAs filed by Form 3 cable systems,[2] which reported at least one distant signal on their SOA filing for the first accounting period of the previous royalty year (*i.e.*, 2010-1), and the corresponding royalties paid by each cable system. Program Suppliers made similar requests, and CDC provided similar reports, in early 2012 relative

review typically causes a several month delay between the date that the SOAs are filed with the Office and the date that the filings are available for CDC's on-site employees to access the information.

[2] For the 2010-13 cable royalty years, Form 3 cable systems contributed the majority of the cable royalties that were collected by the Licensing Division. Form 3 cable systems were responsible for 98.4% of the cable royalties paid in 2010, 98.6% in 2011, 98.7% in 2012, and 98.8% in 2013.

to all Form 3 cable systems who submitted an SOA in the first accounting period of 2011 (*i.e.*, 2011-1), in early 2013 relative to all Form 3 cable systems who submitted an SOA in the first accounting period of 2012 (*i.e.*, 2012-1), and in early 2014 relative to all Form 3 cable systems who submitted an SOA in the first accounting period of 2013 (*i.e.*, 2013-1).

As directed by Program Suppliers, CDC sent the data report for each accounting period described above directly to Dr. Frankel. CDC understood that the data CDC provided in these reports would be utilized by Dr. Frankel to select a sample of cable systems that carried distant signals in the years 2010, 2011, 2012, and 2013.

B. CDC Data Supplied Following Sample Selection

After Dr. Frankel completed the sample selection process for a given royalty year, CDC received a second request from Program Suppliers for more detailed information about the Form 3 systems in Dr. Frankel's sample and the universe of all Form 3 systems previously reported by CDC for 2010, 2011, 2012, and 2013. Program Suppliers requested that the detailed information be broken down into the following five carriage categories: (1) PTV-only systems (cable systems carrying only PTV distant signals); (2) Canadian-only systems (cable systems that carried only Canadian distant signals); (3) WGN-only systems (cable systems that carried only WGN as a distant signal); (4) network affiliates plus systems (cable systems that carried network-affiliated stations only or with other types of stations as distant signals); and (5) independent stations only systems (cable systems that carried two or more independent distant signals, but are not PTV-only, Canadian-only, or WGN-only systems).

As requested by Program Suppliers, CDC sent the detailed information directly to Howard Horowitz and Nuria Riera at Horowitz Research, Inc. CDC understood that this data was to be utilized by Mr. Horowitz and Ms. Riera in connection with Program Suppliers' cable operator surveys for 2010-13.

V. CDC CARRIAGE DATA PROVIDED TO PROGRAM SUPPLIERS IN CONNECTION WITH THEIR NIELSEN STUDIES

At the request of counsel, CDC also provided Program Suppliers with another set of customized data reports for each of the 2010-2013 cable royalty years. For each royalty year, these data reports listed all commercial and non-commercial broadcast stations carried as full-time distant signals by cable systems, the number of distant subscribers to which each station was available, and CDC's calculation of the distant fees generated by that station. I understand that Dr. Jeffrey Gray utilized these data to select the sample stations for each royalty year at issue in this proceeding for Program Suppliers' Nielsen distant viewing studies. I also understand that Dr. Gray utilized these CDC data in his economic analysis.

VI. CDC's LOCAL COUNTY ANALYSIS

After Dr. Gray selected sample stations for each of the 2010-2013 cable royalty years, Program Suppliers' counsel sent the lists of Dr. Gray's sample stations to CDC. CDC then analyzed each of these stations in order to determine which counties fall within the station's local service area. We refer to this exercise as local county analysis.

CDC based identification of the counties local to each of the 2010-2013 cable sample stations on the FCC signal carriage rules.[3] The process CDC followed was different for commercial stations, noncommercial educational stations, and Canadian stations. I explain how CDC conducted its local county analysis for each of these types of stations below. In addition, Appendix A to my testimony provides illustrations of how the local county analysis was performed for each category of stations for 2010-2013.

A. Local County Analysis Of Commercial Stations

For our local county analysis of commercial stations, CDC employed the following general steps: first, we identified the counties that constituted each station's Designated Market Area ("DMA"). All such counties are considered local for that station. Second, we identified the counties in which each station was deemed "significantly viewed" per the FCC. All such counties are considered local for that station pursuant to the FCC's signal carriage rules. Lastly, we looked at other factors that would qualify a county as local to the station in question.

B. Local County Analysis Of Noncommercial Educational Stations

In order to determine the local service area of a noncommercial station, CDC applies the two FCC criteria that define whether a PTV station must be carried by a cable system - the Grade B contour and/or a 50-mile plotted radius. If a cable system's primary headend is located either (1) inside the station's Grade B contour; or (2) within a 50-mile

[3] The signal carriage rules, now rescinded, were found at Sections 76.57 through 76.63 of the regulations of the FCC. 47 C.F.R. §§ 76.57-76.63 (1976).

radius plotted around the city to which the station is licensed, the cable system must carry the PTV station as a local signal.

C. Local County Analysis Of Canadian Stations

CDC used multiple criteria to identify local counties for the Canadian stations in the sample. Some Canadian stations are significantly viewed (SV) in U.S. counties; all such counties were designated as local to the station. Where a station's Grade B included counties located outside all television markets, those counties were designated as local.

Once CDC completed the local county analysis, I sent the results to Program Suppliers' counsel. I understand that the results of CDC's local county analysis were provided to Nielsen.

Thank you for the opportunity to present this information in this proceeding. I hope that it will assist you in your deliberations.

ALLOCATION HEARING EXHIBIT 6003

DECLARATION OF JONDA K. MARTIN

I declare under penalty of perjury that the foregoing testimony is true and correct, and of my personal knowledge.

Executed on December 22, 2016

Jonda K. Martin

MARTIN

APPENDIX A

I. LOCAL COUNTY ANALYSIS OF COMMERCIAL STATIONS

A. Local County Analysis Illustration For Commercial Station WKBD, Channel 50, Licensed To Detroit, Michigan

Described below are the steps CDC employed for the county analysis of commercial stations. The steps consist principally of Designated Market Area ("DMA") analysis, significantly viewed ("SV") analysis, 35-mile zone analysis, and the Grade B Contour analysis. I selected for the purpose of illustration, commercial station WKBD, channel 50, licensed to Detroit. The analysis applied to WKBD is repeated for all of the commercial stations in each sample for which CDC conducted a county analysis.

1. DMA Analysis

Nielsen groups counties by DMAs.[1] Each DMA consists of a group of counties forming an exclusive geographic area in which Nielsen has determined that the home market television stations hold a dominance of viewing. Although a few counties are split between DMAs, as a rule each county is assigned to one and only one DMA.

Attachment 1 is a page with the Detroit market (among others) from Nielsen's 2010 DMA report titled "U.S. TV Household Estimates" ("the DMA book"), published September 2009, which shows all DMAs and the counties associated with each. This page provides a good example of how DMAs are used to identify local cable system carriage for station WKBD. Again, the objective in determining the counties where a station is local is to enable Nielsen to exclude cable viewing from those counties, with the result that only distant viewing for WKBD will be captured.

The Detroit DMA market consists of nine Michigan counties:

Lapeer	Sanilac
Livingston	St. Clair
Macomb	Washtenaw
Monroe	Wayne
Oakland	

Because WKBD is licensed to Detroit, a cable system serving communities in any of these nine counties must carry WKBD to its subscribers as a local signal. CDC concluded that these nine counties were within WKBD's local service area.

2. Significantly Viewed Analysis

Besides the DMA criterion, stations are considered local in counties and/or communities in which the Federal Communications Commission ("FCC") has deemed the station is "significantly viewed" (SV) meaning the station reaches certain FCC-defined viewing thresholds

[1] The definition of "local service area" in Section 111(f) and 47 C.F.R. § 76.55(e)(2) defines a station's market as its Nielsen DMA.

within the county or community. Because a cable system serving County X must carry stations that are significantly viewed in County X (or Community X), such carriage is considered local.

Attachment 2 lists selected counties in Michigan and Ohio and the TV stations significantly viewed in each as reported on the FCC's website: https://transition.fcc.gov/mb/significantviewedstations041916.pdf.

In the case of WKBD, four counties outside the DMA are considered SV:

Genesee, MI	Lucas, OH
Lenawee, MI	Wood, OH

If a cable system serves communities located in these SV counties, that system must carry WKBD as a local signal and consequently, those SV counties were considered local to WKBD.

B. Other Criteria For Determining Whether a Station Is Local

Besides the DMA and SV criteria, which identify the vast majority of local counties, CDC also examined other criteria to see if there are any additional counties that would be considered local. These criteria include the station's 35-Mile Specified Zone and Grade B Contour.

1. 35-Mile Specified Zone

For all television markets, major and smaller, a cable system's carriage of a TV station to subscribers located inside the station's 35 mile specified zone means the station is local to those subscribers.

A copy of the 35-Mile Specified Zone for Detroit is shown as Attachment 3. FCC rules require a cable system serving communities located within that specified zone to carry WKBD as a local signal. Review of the zone indicated that the counties within the specified zone had already been classified as local due to the SV/DMA criteria.

2. The Grade B Contour

Another criterion, in some situations, is the Grade B contour. The contour is an irregular and oddly-shaped circle surrounding the TV station's transmitter site. The Grade B is a measure of estimated signal strength based on the station's antenna size, power, and direction. The Grade B, in other words, is a measure of how clear a picture can be expected to be on a person's television set.

The Grade B contour can be used as a criterion in two circumstances relevant to the local county analysis CDC performed for 2010-2013. The first circumstance has to do with stations licensed to smaller markets. If a cable system serves communities located in a smaller market, (*i.e.*, located within the 35-mile zone of such a market), the system can carry as local any station from another smaller market whose Grade B encompasses the communities served by the system. The second circumstance relates to systems serving communities located outside all television markets. In the case of a system serving such an area, the system may carry as local all stations whose Grade Bs encompass the communities served by the cable system. In both

circumstances, if the station is local per the Grade B criterion, the Form 3 cable operator does not have to account for the station in its royalty calculation.

Attachment 3 further shows the Grade B contour of WKBD that CDC downloaded from the FCC's website shaded in yellow: https://www.fcc.gov/media/television/tv-service-contour-data-points.

Cable systems serving communities that fall "outside all (television) markets" must carry as a local signal any station whose Grade B encompasses the communities of the system. To identify any such counties, CDC looked to see if there were any *additional* counties within WKBD's Grade B contour that were outside all markets and not already classified local by a previous standard. That review indicated that the counties within the Grade B contour had either already been classified as local due to the SV/DMA criteria or were not outside all markets.

Once CDC identified all the local counties for WKBD, I provided those counties to Program Suppliers' counsel. WKBD's local counties were the nine counties in the Detroit DMA, plus the four SV counties, for a total of 13 counties in which WKBD was a local signal.

C. County Analysis For "Partially-Local" Stations

In the course of CDC's analyses, we may find that an entire county is neither wholly distant nor wholly local. An example would be a county that is neither SV nor DMA for a station, but which falls partially within the 35-mile zone of the station's market. Another example might be a county located outside all television markets and partially covered by a station's Grade B. In these few cases, CDC relies on the location of a majority of the county's population to designate the county as local or distant. Because the entire county must be classified as either local or distant for purposes of the Nielsen Studies, it is reasonable to assume that viewing will track with population. For example, are more people (*i.e.*, viewers) located *inside* the 35-mile zone (or Grade B) or outside? If, in our example, most of the population is within the station's Grade B contour, we consider the county local. CDC relies on mapping, distance calculations and census data to measure coverage of a county in relation to the Grade B (or 35-mile zone).

II. LOCAL COUNTY ANALYSIS OF NONCOMMERCIAL STATIONS

A. Local County Analysis Illustration For Public Television ("PTV") Station KCTS, Channel 9, Licensed To Seattle, Washington

Described below are the steps CDC employed for the county analysis of noncommercial stations. The steps consist principally of conducting a 50-mile zone analysis and/or the Grade B Contour analysis. I selected for the purpose of illustration, PTV station KCTS, channel 9 licensed to Seattle, WA. The analysis applied to KCTS is repeated for all of the noncommercial stations in each sample for which CDC conducted a county analysis.

As set forth above, a station's Grade B contour is an irregular and oddly-shaped circle surrounding the TV station's transmitter site, and is a measure of estimated signal strength based on the station's antenna size, power, and direction.

To identify the Grade B contour for KCTS, we downloaded the KCTS Grade B map from the FCC website:

https://www.fcc.gov/media/television/tv-service-contour-data-points

Next, CDC mapped a 50-mile radius around the reference coordinates (76.53) for Seattle, the city to which KCTS is licensed. As Attachment 4 shows, KCTS's Grade B is larger than its 50-mile radius, so the Grade B was the sole determining factor for identifying the local counties. However, had the 50-mile radius been larger, any additional counties partially or totally within the radius would have been marked as local.

Three Washington counties are entirely within KCTS's Grade B:

Island Kitsap

King

Through the process of mapping these contours in relation to the census block population data from the Census Bureau website, we identified five more Washington counties had the majority of their population within KCTS's Grade B:

Jefferson Pierce Thurston

Mason Snohomish

We classified these five counties as local for purposes of the Nielsen analysis.

III. LOCAL COUNTY ANALYSIS FOR CANADIAN STATIONS

A. Local County Analysis Illustration For Canadian Station CFTO, Channel 9, Licensed To Toronto, Canada

As set forth in my testimony, we employed multiple criteria to identify local counties for the Canadian stations in the sample. Where a Canadian station is SV in U.S. counties, all such counties were designated as local to the station. Where a Canadian station's Grade B included counties located outside all television markets, those counties were designated as local.

Described below are the steps CDC employed for the county analysis of Canadian station, CFTO, channel 9, licensed to Toronto, Canada. The analysis applied to CFTO is repeated for all of the Canadian stations in each sample for which CDC conducted a county analysis.

CFTO is significantly viewed (SV) in Niagara County, NY, so I designated that county as local for CFTO. Because CFTO is SV in *some* communities located in Erie County, NY, I analyzed the county population as described above for KCTS to determine that CFTO was SV to only 39.1% of the Erie County population, so I did not designate Erie County, NY as a local county for station CFTO.

MARTIN

APPENDIX A

ATTACHMENT 1

ALLOCATION HEARING EXHIBIT 6003

U.S. TV HOUSEHOLD ESTIMATES

BY COUNTY WITHIN DESIGNATED MARKET AREA (DMA)

DESIGNATED MARKET AREA** / STATE / COUNTY	COUNTY SIZE *	TOTAL HOUSEHOLDS	TV HOUSEHOLDS	% TV PENE-TRATION	% OF U.S. TV HOUSEHOLDS
679 DES MOINES-AMES (CONT'D)					
IOWA					
MAHASKA	D	9,000	8,910		
MARION	D	12,400	12,330		
MARSHALL	D	15,500	15,430		
MONROE	D	3,100	3,060		
POCAHONTAS	D	3,200	3,190		
POLK	M B	174,300	173,500		
POWESHIEK	D	7,400	7,330		
RINGGOLD	D	2,100	2,080		
STORY	M C	32,600	32,360		
TAYLOR	D	2,500	2,470		
UNION	D	5,400	5,360		
WARREN	M B	17,000	16,970		
WAYNE	D	2,600	2,550		
WEBSTER	D	15,100	15,030		
WRIGHT	D	5,300	5,250		
505 DETROIT		1,900,000	1,890,220	99	1.646
MICHIGAN					
LAPEER	M A	32,300	32,160		
LIVINGSTON	M A	67,500	67,190		
MACOMB	M A	336,800	336,090		
MONROE	A	58,100	57,930		
OAKLAND	M A	483,600	481,790		
SANILAC	D	16,500	16,300		
ST CLAIR	M A	65,000	64,730		
WASHTENAW	A	136,400	134,910		
WAYNE	M A	703,800	699,120		
606 DOTHAN		102,600	101,840	99	.089
ALABAMA					
COFFEE	M D	20,300	20,130		
DALE	M C	19,300	19,140		
GENEVA	M D	10,900	10,800		
HENRY	M D	6,900	6,850		
HOUSTON	M C	40,600	40,360		
GEORGIA					
EARLY	D	4,600	4,560		
676 DULUTH-SUPERIOR		176,300	174,360	99	.152
MICHIGAN					
GOGEBIC	D	6,600	6,460		
MINNESOTA					
CARLTON	M D	13,400	13,330		
COOK	D	2,600	2,490		
ITASCA	D	18,700	18,500		
KOOCHICHING	D	5,800	5,710		
LAKE	D	4,600	4,570		
ST LOUIS	M C	82,400	81,680		
WISCONSIN					
ASHLAND	D	6,700	6,570		
BAYFIELD	D	6,600	6,450		
DOUGLAS	M C	18,500	18,410		
IRON	D	3,000	2,990		
SAWYER	D	7,400	7,200		
765 EL PASO (LAS CRUCES)		313,700	310,760	99	.271
NEW MEXICO					
DONA ANA	C	71,900	70,550		
TEXAS					
CULBERSON	D	900	890		
EL PASO	M B	239,800	238,260		
HUDSPETH	D	1,100	1,060		
565 ELMIRA (CORNING)		97,000	95,790	99	.083
NEW YORK					
CHEMUNG	M C	34,700	34,520		
SCHUYLER	D	7,400	7,300		
STEUBEN	C	38,800	38,240		
PENNSYLVANIA					
TIOGA	D	16,100	15,730		
516 ERIE		157,700	156,520	99	.136
PENNSYLVANIA					
CRAWFORD	C	34,200	33,690		
ERIE	M C	106,800	106,330		
WARREN	D	16,700	16,500		
801 EUGENE		247,700	241,730	98	.210
OREGON					
BENTON	C	33,800	32,680		
COOS	C	27,300	26,610		
DOUGLAS	C	42,800	41,890		
LANE	M C	143,800	140,550		
802 EUREKA		63,900	61,090	96	.053
CALIFORNIA					
DEL NORTE	D	10,000	9,590		
HUMBOLDT	M C	53,900	51,500		
649 EVANSVILLE		293,600	291,830	99	.254
ILLINOIS					
EDWARDS	D	2,700	2,690		
WABASH	D	4,900	4,870		
WAYNE	D	7,000	6,900		
WHITE	D	6,300	6,260		
INDIANA					
DUBOIS	D	16,100	16,030		
GIBSON	M D	13,100	13,030		
PERRY	D	7,500	7,470		
PIKE	D	5,000	4,950		
POSEY	M C	9,900	9,850		
SPENCER	D	7,600	7,540		
VANDERBURGH	M C	72,800	72,530		
WARRICK	M C	22,500	22,390		
KENTUCKY					
DAVIESS	C	39,200	39,050		
HANCOCK	D	3,500	3,460		
HENDERSON	M C	19,000	18,920		
HOPKINS	D	19,400	19,240		
MCLEAN	D	4,000	3,960		
MUHLENBERG	D	12,500	12,270		
OHIO	D	9,600	9,520		
UNION	D	5,600	5,580		
WEBSTER	M D	5,400	5,320		
745 FAIRBANKS		37,900	36,250	96	.032
ALASKA					
FAIRBNKS-PLUS	C	37,900	36,250		
724 FARGO-VALLEY CITY		242,300	240,330	99	.209
MINNESOTA					
BECKER	D	13,100	12,920		
CLAY	M C	21,400	21,340		
CLEARWATER	D	3,400	3,300		
KITTSON	D	1,800	1,790		
LAKE OF WOODS	D	1,700	1,660		
MAHNOMEN	D	2,000	1,990		
MARSHALL	D	3,900	3,880		
NORMAN	D	2,700	2,680		
OTTER TAIL	D	23,000	22,780		
PENNINGTON	D	5,700	5,660		
POLK	C	12,100	12,020		
RED LAKE	D	1,700	1,680		
ROSEAU	D	6,200	6,120		
WILKIN	D	2,400	2,390		
NORTH DAKOTA					
BARNES	M D	4,500	4,480		
BENSON	D	2,300	2,280		
CASS	M C	62,600	62,060		
CAVALIER	D	1,600	1,590		
DICKEY	D	2,000	1,990		
EDDY	D	1,000	990		
FOSTER	D	1,400	1,390		
GRAND FORKS	C	25,900	25,750		
GRIGGS	D	1,000	1,000		
LA MOURE	D	1,700	1,690		
NELSON	D	1,400	1,390		
PEMBINA	D	3,100	3,030		
RAMSEY	D	4,700	4,680		
RANSOM	D	2,300	2,280		
RICHLAND	D	6,400	6,360		
SARGENT	D	1,700	1,680		
STEELE	D	700	690		
STUTSMAN	D	8,400	8,340		
TOWNER	D	900	890		
TRAILL	D	3,100	3,080		
WALSH	D	4,500	4,480		
513 FLINT-SAGINAW-BAY CITY		460,200	458,020	100	.399
MICHIGAN					
ARENAC	D	6,400	6,350		
BAY	M B	44,200	44,040		
GENESEE	M A	168,300	167,600		

M METRO COUNTY OF DMA MARKET
NM METRO COUNTY OF NON-DMA MARKET

* SEE PAGE A FOR COUNTY SIZE DEFINITIONS
** SEE PAGE A FOR DMA CODE AND NAME DEFINITION

MARTIN

APPENDIX A

ATTACHMENT 2

ALLOCATION HEARING EXHIBIT 6003

Significantly-Viewed Counties---WKBD, Detroit

Michigan

Genesee
WNEM-TV, 5, Bay City, MI
WJRT-TV, 12, Flint, MI
+WSMH, 66, Flint, MI
#WJBK, 2, Detroit, MI
#WDIV, 4, Detroit, MI (formerly WWJ)
#WXYZ-TV, 7, Detroit, MI
#WKBD-TV, 50, Detroit, MI
WLNS-TV, 6, Lansing, MI (formerly WJIM)

Lenawee
WJBK, 2, Detroit, MI
WDIV, 4, Detroit, MI (formerly WWJ)
WXYZ-TV, 7, Detroit, MI
CBET, 9, Canada (formerly CKLW)
WKBD-TV, 50, Detroit, MI
WTOL-TV, 11, Toledo, OH
WTVG, 13, Toledo, OH (formerly WSPD)
WNWO-TV, 24, Toledo, OH (formerly WDHO)
+WUPW, 36, Toledo, OH

Ohio

Lucas
WTOL-TV, 11, Toledo, OH
WTVG, 13, Toledo, OH (formerly WSPD)
WNWO-TV, 24, Toledo, OH (formerly WDHO)
+WUPW, 36, Toledo, OH
#WJBK, 2, Detroit, MI
#WXYZ-TV, 7, Detroi, MI
+WKBD-TV, 50, Detroit, MI

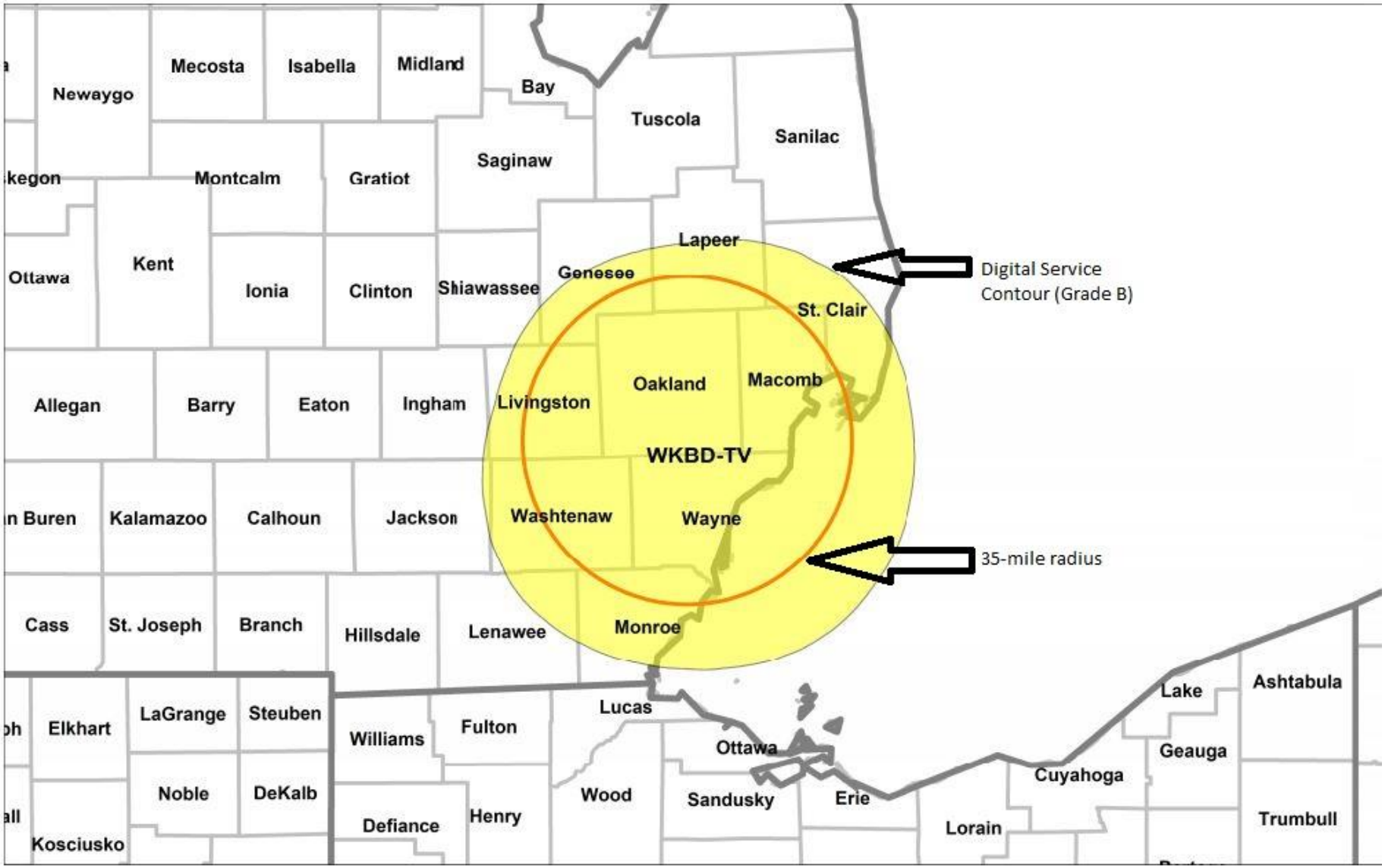
Wood
WTOL-TV, 11, Toledo, OH
WTVG, 13, Toledo, OH (formerly WSPD)
WNWO-TV, 24, Toledo, OH (formerly WDHO)
+WUPW, 36, Toledo, OH
WKBD-TV, 50, Detroit, MI

MARTIN

APPENDIX A

ATTACHMENT 3

WKBD-DT Ch.50 CW Detroit, MI

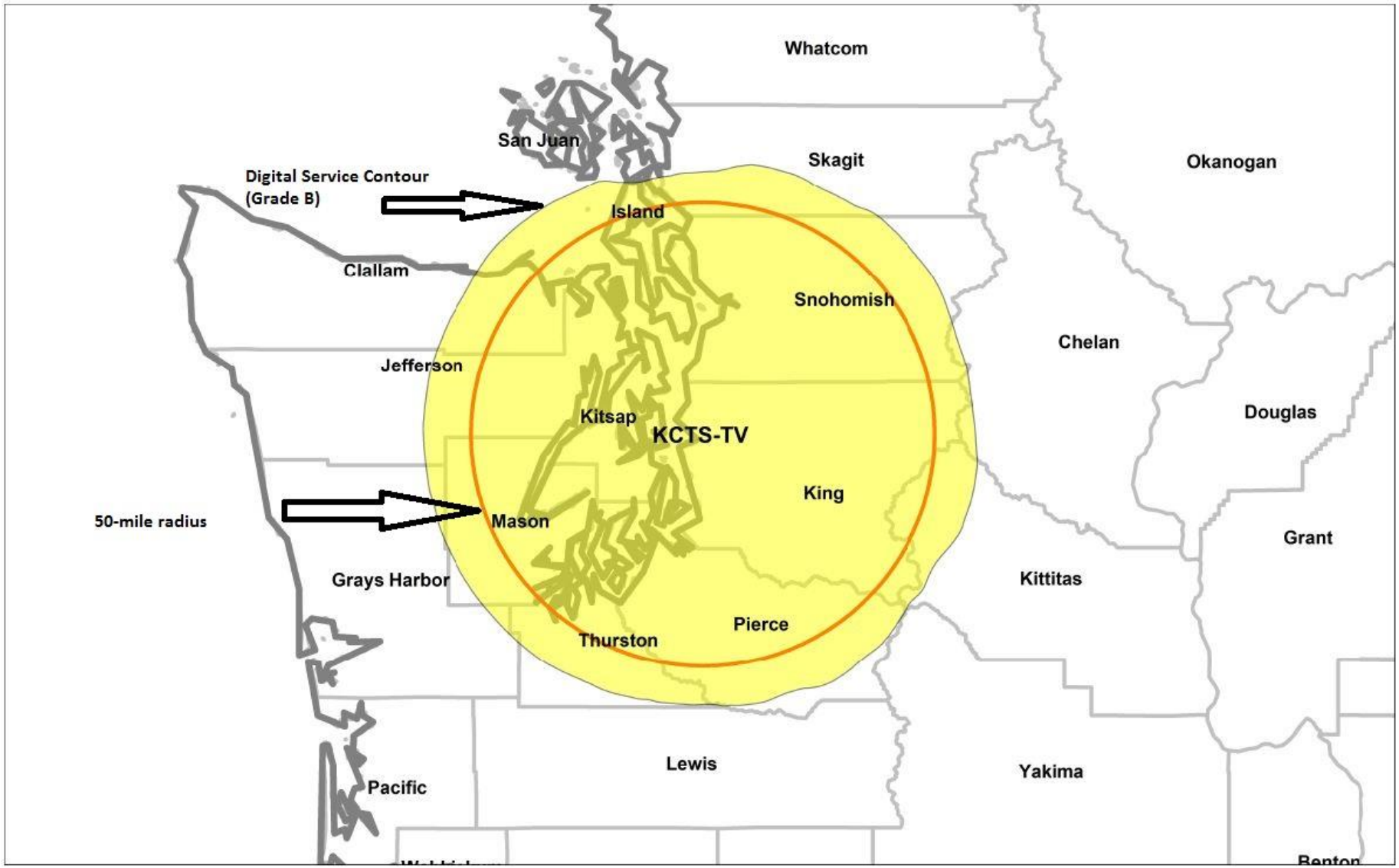


MARTIN

APPENDIX A

ATTACHMENT 4

KCTS-DT Ch.9 PBS Seattle, WA Cable Data Corp



Certificate of Service

I hereby certify that on Monday, February 12, 2018 I provided a true and correct copy of the Written Direct Testimony of Jonda K. Martin, filed December 22, 2016 in Docket No. 14-CRB-0010-CD (2010-13). to the following:

Public Broadcasting Service (PBS), represented by Lindsey L. Tonsager served via Electronic Service at ltonsager@cov.com

Joint Sports Claimants, represented by Michael S Laane served via Electronic Service at sean.laane@apks.com

SESAC, Inc., represented by John C. Beiter served via Electronic Service at jbeiter@lsglegal.com

Devotional Claimants, represented by Benjamin S Sternberg served via Electronic Service at ben@lutzker.com

Multigroup Claimants, represented by Brian D Boydston served via Electronic Service at brianb@ix.netcom.com

Spanish Language Producers, represented by Brian D Boydston served via Electronic Service at brianb@ix.netcom.com

Canadian Claimants Group, represented by Victor J Cosentino served via Electronic Service at victor.cosentino@larsongaston.com

National Association of Broadcasters (NAB), represented by Ann Mace served via Electronic Service at amace@crowell.com

Broadcast Music, Inc. (BMI), represented by Jennifer T. Criss served via Electronic Service at jennifer.criss@dbr.com

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis served via Electronic Service at smosenkis@ascap.com

National Public Radio, Inc. (NPR), represented by Gregory A Lewis served via Electronic Service at glewis@npr.org

Signed: /s/ Lucy H Plovnick