

March 9. I learned last night that my phone number has been unreachable from outside the GCI phone network. This has reportedly been fixed. I'm sorry for any inconvenience.

March 7. I've just faxed Senator Lisa Murkowski to see if her staff can find out why the following objection isn't included in the FCC's transition.fcc.gov/fcc-bin/tvq?facid=49632. The post office certified that T SLEDGE signed for it on behalf of the FCC 20554 on February 26 at 7:57 a.m.

On GCI purchase of KTVA

w-gregg.juneau.ak.us/2013/2013b22-ktva - [Permalink](#) - [Home](#).

Apparently, comments should say that one is an actual viewer; that a copy has been sent to KTVA (1007 West 32nd Avenue, Anchorage, AK 99503); and that the information is true. The original and two copies should be received by the FCC by Mar. 4.

By Walter Gregg, a concerned viewer

P.O. Box: 21693

Juneau, Alaska 99802

retL@w-gregg.juneau.ak.us

907-500-7017

February 22, 2013

License Renewal Processing Team
Video Div., U.S. FCC
445 12th Street SW Room 2-A665
Washington, DC 20554

Objection to KTVA license reassignment

Re: Station: KTVA; Facility: 49632; Application: BALCDT-20130125ABD.

Dear Reader:

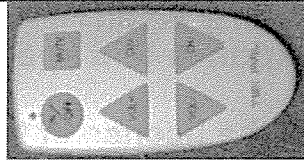
1. **Standing.** I am a viewer of the on-air signal from KTVA Anchorage via the relay station KXLJ-LD Juneau. KXLJ broadcasts on RF and virtual channel 24. (This is also carried on cable channel 14, but I don't have cable.) They currently carry live CBS programming (e.g., 60 minutes, The Late Show w/Letterman) in standard definition (480i) format. Juneau once had only one over-air station, in black and white and tape-delayed. If you didn't have cable TV, you basically had no service. Now, for the first time in the history of Alaska's capital city, all major networks (PBS, NBC, ABC, FOX, CBS) are represented over-the-air. Cable TV is no longer a necessity. Competition finally arrived, thanks to digital TV. I obviously have a personal interest in the continued availability of the major network

programming over-the-air. What happens to KTVA matters to me because it's presently the source of our KXLJ CBS programming. I have no knowledge of whether KXLJ will be able to obtain an alternative CBS feed, should GCI finalize its purchase of KTVA and discontinue the CBS affiliation.

2. **Parties; Application.** The current licensee of KTVA, Affiliated Media, Inc. FCC Trust, has filed an application to reassign the license to Denali Media Southeast, Corp. This is a subsidiary of GCI, Alaska's dominant Cable TV company. GCI, through their subsidiary, is planning to purchase a number of Alaska stations including KATH-HD (NBC Juneau) and KTVA (CBS Anchorage).
3. **Origin of concerns.** GCI has provided no assurances of continued over-the-air availability of NBC or CBS programming. In fact, their news release indicated that they want to re-brand the stations, transforming them into a news and entertainment leader, a statewide platform for news and information, as well as providing unique content.[1] News articles suggest this is connected with GCI's existing cable channel 1.[2] This certainly implies the end of the current programming. The entire transaction raises a number of concerns.
4. **The reassignment may be anticompetitive.** GCI lost about 6,000 cable subscribers in Alaska during 2011 through March 2012.[3] Clearly, they're feeling the bite of competition. Free, over-the-air programming is part of that competition. Is it an acceptable response to competition to buy it up and snuff out the on-air programming that viewers are only now coming to realize is available? Juneau would apparently stand to lose both over-air NBC and CBS. (As aforementioned, our over-air CBS is relayed from KTVA Anchorage. GCI is also purchasing the Juneau NBC affiliate, for which I have filed a separate objection.)
5. **Cable TV may be an unaffordable alternative to on-air programming.** Stand-alone basic cable in Juneau currently costs hundreds of dollars a year (\$270/year for one set, per a GCI telephone representative). But free, over-air major network television has been one of the things everyone could share, for better or worse. If the transaction is allowed and GCI terminates existing on-air NBC and CBS programming, it becomes simply unavailable to many in the community. It is difficult to see how this serves the public interest, convenience, or necessity.

6. Cable TV may be an inaccessible alternative to on-air programming for Americans with Disabilities.

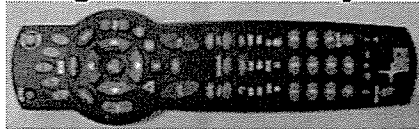
a.



Tek-Pal Antenna DTV Remote

GCI does not support the use of digital cable-ready sets for basic cable without a converter box. They provide no PSIP (virtual channel) signals. Basic programming can be received, but in random channel order which may change without notice. GCI does not even provide a channel map for this setup. The simplicity of using a simplified remote such as the Tek Pal with a digital cable-ready set is thus impractical.

b.



GCI Cable DTV Remote

GCI instead expects everyone to rent a cable converter box -- one per set. But the universal remote provided is inaccessible to those with cognitive disabilities, vision disabilities, and manual dexterity issues.[4] It is simply far too complex. If the transaction is allowed and GCI terminates existing on-air NBC and CBS programming, it becomes effectively unavailable to viewers who cannot cope with the added complexity of cable. Again, it's hard to see how this serves the public interest. By no stretch of the imagination can it be called convenient or necessary.

7. The cable company's interest may conflict with that of over-air viewers. Cable operators make money in part by selling basic cable TV subscriptions. Pouring money into uninterrupted high quality over-air service that helps customers cancel basic cable and switch to free over-air reception doesn't seem to be in their financial interest.[5]

8. There has been inadequate public notice. I wrote to tvinfo@fcc.gov on February 1[6] and sent a followup fax on February 11[8] in an attempt to obtain information on the commenting procedures, where to find further information, what the deadline for comments might be, and so forth. Yet to date I have received no reply by email, phone, or postal mail. It transpires that the FCC published public notice of the license transfer in the daily digest dated January 30. That document contains no reference to a right to

comment or procedures to do so. There is at least some doubt over the validity of public notice that omits such information particularly when compounded by the lack of response to a specific inquiry about the matter.

9. I object to the reassignment of the license at this time. Given the above concerns and the lack of detailed programming plans from GCI, I object to the reassignment of the license to Denali Communications Southeast, Corp. Assurances that existing network programming will continue would make a difference to me, and might be possible if they choose to transmit multiple channels. More meaningful public notice would also make a difference. But in the absence of that, I'm opposed to the license transfer. I don't think it serves the public interest and I am far from certain that public notice requirements have been met.
10. Station copy. I certify that a copy of this letter has been mailed to KTVA, 1007 West 32nd Avenue, Anchorage, 99503.
11. True information. I certify that the statements made in this letter are true to the best of my knowledge and belief.

Thank you.

Very Truly Yours,

/s/

Walter Gregg

-
1. GCI, *Denali Media Holdings Purchases Anchorage CBS Affiliate and Southeast Alaska NBC Affiliates [Press Release]*, Nov. 9, 2012, at <http://gci.com/denali-media-holdings-press-release>, retrieved Feb. 20, 2013.
 2. *Alaska Telecom GCI buys Anchorage television station KTVA, 2 others*, Nov. 9, 2012, at <http://alaskadispatch.com/article/alaska-telecom-gci-buys-anchorage-television-station-ktva-2-others>, retrieved Feb. 20, 2013.
 3. Jensen, *GCI Income Flat as Customers Cut Cable*, Alaska J. of Com., May 10, 2012, at <http://alaskajournal.com/Alaska-Journal-of-Commerce/May-Issue-2-2012/GCI-income-flat-as-customers-cut-cable/>.
 4. Pedlow, *How will the Changeover to Digital*

Broadcasting in 2009 influence the Accessibility of TV for Americans with Disabilities?, Disability Studies Quarterly Fall 2008 Vo. 28 No. 4 at <http://dsq-sds.org/article/130/130>, retrieved Feb. 20, 2013. (Discusses the problematic set-top box needed for analog sets, which is analagous to the cable TV converter box.)

5. Existing broadcasters also view on-air reception as less critical so long as cable reception is uninterrupted. For example, theCW, the third subchannel of KJUD (virtual 8, carrier 11) has been unavailable on-air to most sets since at least June 2, 2012. Similarly, 360 North, the third subchannel of KTOO (virtual 3, carrier 10) has been unavailable on-air to most sets since at least February 10, 2013. Emails to Walter Gregg from Ed Youmans, KJUD Directory of Engineering (Jul. 6, 2012) and Bill Legere, KTOO Station Manager (Feb. 2013) have confirmed that both stations are having over-air PSIP (virtual channel) problems and that the fix may be some way down the road. Because they're available on the cable, the on-air signal is not considered critical. The cable company has even less incentive to maintain on-air transmission.
6. *eMail from Walter Gregg to tvinfo@fcc.gov* , Feb. 1, 2013, inquiring about GCI cable TV's proposed purchases and requesting information on when the public would have an opportunity to learn more and to comment. The message was sent via gMail. It did not bounce, but no confirmation or reply was ever received via email (I did check the spam folder) and no postal reply was received either.
7. *Fax from Walter Gregg to the FCC tvinfo section at 1-202-418-2827* on February 11, 2013, inquiring about the same matter and requesting a timely response. An automatic fax confirmation of successful transmission was received, but no response of any kind was has been received to date.

08074