

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

In the Matter of)
)
WRNN License Company, LLC) MB Docket No. 20-153
) CSR 8990-A
For Modification of the Television Market of)
Station WRNN-TV, New Rochelle, New York)

MEMORANDUM OPINION AND ORDER

Adopted: September 1, 2020

Released: September 1, 2020

By the Senior Deputy Chief, Policy Division, Media Bureau:

I. INTRODUCTION

1. WRNN License Company, LLC (WRNN License Co. or Petitioner), licensee of television station WRNN-TV, New Rochelle, New York (Facility ID No. 74156) (WRNN or Station) filed the above-captioned Petition¹ requesting modification of the Station’s television market to include all of the communities located in the New York Designated Market Area (DMA) and served by Comcast cable systems² in the following New Jersey counties: Bergen, Hudson, Hunterdon, Middlesex, Morris, Monmouth, Ocean, Somerset, Union, and Warren (Communities).³ The Petition is unopposed. For the reasons stated below, we grant the Petition.

II. BACKGROUND

A. Market Modification Procedures

2. Pursuant to section 614 of the Communications Act of 1934, as amended (the Act), and implementing rules adopted by the Commission in its Must Carry Order, commercial broadcast television

1 See WRNN License Company, LLC for Modification of the Television Market for Station WRNN-TV, New Rochelle, New York, Facility ID 74156, Petition for Special Relief, MB Docket 20-153 (filed May 22, 2020) (WRNN Petition). The Media Bureau placed the Petition on public notice and sought comment. Special Relief and Show Cause Petitions, Public Notice, Report No. 0492 (MB May 29, 2020) (Public Notice).

2 The Petitioner states that according to the Commission’s Cable Operations and Licensing System (COALS) database, Comcast Communications, LLC does business in the various communities at issue as Comcast Cablevision of Central New Jersey Inc., Comcast of Monmouth County LLC, Comcast of Jersey City LLC, Comcast of Central New Jersey II, LLC, Comcast of Northwest New Jersey LLC, Comcast of Ocean County, LLC, Comcast of Plainfield LLC, Comcast of Southeast Pennsylvania Inc., and Comcast of the Meadowlands LLC. For ease of reference, the Petitioner states that it refers to the relevant cable systems as “Comcast” throughout its pleading. Petition at n.1. We do the same herein.

3 The Petitioner states that it “is seeking to add the communities identified on Exhibit A [herein] and any additional communities in the same counties or served by the same systems and not presently included in WRNN’s television market.” Petition at n.2. The Communities submitted by the Petitioner are listed in the attached Addendum.

stations are entitled to assert mandatory carriage rights on cable systems located within the station's market.⁴ A station's default market for this purpose is its DMA as defined by Nielsen Media Research.⁵ A DMA is a geographic market designation that defines each television market exclusive of others, based on measured viewing patterns. Essentially, each county in the continental United States is allocated to a market based on which stations receive a preponderance of total viewing hours in the county.⁶

3. Under the Act, however, the Commission is also directed to consider changes in a station's local market. Section 614(h)(1)(C) provides that the Commission may:

with respect to a particular television broadcast station, include additional communities within its television market or exclude communities from such station's television market to better effectuate the purposes of this section.⁷

In considering such requests, the Act provides that:

the Commission shall afford particular attention to the value of localism by taking into account such factors as –

(I) whether the station, or other stations located in the same area, have been historically carried on the cable system or systems within such community;

(II) whether the television station provides coverage or other local service to such community;

(III) whether modifying the market of the television station would promote consumers' access to television broadcast station signals that originate in their State of residence;⁸

(IV) whether any other television station that is eligible to be carried by a cable system in such community in fulfillment of the requirements of this section provides news coverage of issues of concern to such community or provides carriage or coverage of sporting and other events of interest to the community; and

⁴ *Implementation of the Cable Television Consumer Protection and Competition Act of 1992, Broadcast Signal Carriage Issues*, 8 FCC Rcd 2965, 2976-77, paras. 42-47 (1993) (*Must Carry Order*).

⁵ Section 614(h)(1)(C) of the Act, as amended by the Telecommunications Act of 1996, provides that a station's market shall be determined by the Commission by regulation or order using, where available, commercial publications which delineate television markets based on viewing patterns. See 47 U.S.C. § 534(h)(1)(C). Section 76.55(e) requires that a commercial broadcast television station's market be defined by Nielsen Media Research's DMAs. 47 CFR § 76.55(e); see *Definition of Markets for Purposes of the Cable Television Broadcast Signal Carriage Rules*, Order on Reconsideration and Second Report and Order, 14 FCC Rcd 8366 (1999) (*Modification Final Report and Order*).

⁶ For purposes of Nielsen's calculation, both over-the-air and cable television viewing are included. For a more complete description of how counties are allocated, see Nielsen Media Research's *Nielsen Station Index: Methodology Techniques and Data Interpretation*.

⁷ 47 U.S.C. § 534(h)(1)(C).

⁸ The STELA Reauthorization Act of 2014, Pub. L. No. 113-200, 128 Stat. 2059 (2014), enacted December 4, 2014, added a new statutory factor, denominated as factor III above. See also *Amendment to the Commission's Rules Concerning Mkt. Modification, Implementation of Section 102 of the STELA Reauthorization Act of 2014*, Report and Order, 30 FCC Rcd 10406 (2015) (*STELAR Market Mod. Order*).

(V) evidence of viewing patterns in cable and noncable households within the areas served by the cable system or systems in such community.⁹

4. In order to establish a station's relationship to the community at issue as required by the Act, section 76.59(b) of the Commission's rules requires requests for market modification to be supported by the following evidence:

- (1) A map or maps illustrating the relevant community locations and geographic features, station transmitter sites, cable system headend locations, terrain features that would affect station reception, mileage between the community and the television station transmitter site, transportation routes and any other evidence contributing to the scope of the market;
- (2) Noise-limited service contour maps (for full-power digital stations) or protected contour maps (for Class A and low power television stations) delineating the station's technical service area and showing the location of the cable system headends or satellite carrier local receive facilities and communities in relation to the service areas;¹⁰
- (3) Available data on shopping and labor patterns in the local market;
- (4) Television station programming information derived from station logs or the local edition of the television guide;
- (5) Cable system channel line-up cards or other exhibits establishing historic carriage, such as television guide listings;
- (6) Published audience data for the relevant station showing its average all day audience (*i.e.*, the reported audience averaged over Sunday-Saturday, 7 a.m.-1 a.m., or an equivalent time period) for both cable and noncable households or other specific audience indicia, such as station advertising and sales data or viewer contribution records; and

⁹ 47 U.S.C. § 534(h)(1)(C)(ii)(I)-(V). The legislative history of the provision states that:

where the presumption in favor of [DMA] carriage would result in cable subscribers losing access to local stations because they are outside the [DMA] in which a local cable system operates, the FCC may make an adjustment to include or exclude particular communities from a television station's market consistent with Congress' objective to ensure that television stations be carried in the area in which they serve and which form their economic market.

* * * *

[This subsection] establishes certain criteria which the Commission shall consider in acting on requests to modify the geographic area in which stations have signal carriage rights. These factors are not intended to be exclusive, but may be used to demonstrate that a community is part of a particular station's market.

H.R. Rep. 102-628, 102d Cong., 2d Sess. 97 (1992). In adopting rules to implement section 614(h)(1)(C), the Commission indicated that requested changes should be considered on a community-by-community basis rather than on a county-by-county basis, and that they should be treated as specific to particular stations rather than applicable in common to all stations in the market. *Must Carry Order*, 8 FCC Rcd at 2977, n.139.

¹⁰ Section 76.59(b)(2) contains the following note: "Service area maps using Longley-Rice (version 1.2.2) propagation curves may also be included to support a technical service exhibit." 47 CFR § 76.59(b)(2).

(7) If applicable, a statement that the station is licensed to a community within the same state as the relevant community.¹¹

5. In the *Incentive Auction Report and Order*, the Commission recognized that “relocations made to implement a channel sharing arrangement may have [impacts] on a station’s [multichannel video programming distributor (MVPD)] carriage rights.”¹² It noted that the carriage rights of a station moving within its DMA “will not be expanded or diminished through this process, although its ability to exercise these rights may change based upon the facts of its specific channel sharing arrangement.”¹³ In particular, the Commission noted,

a full power commercial station that relocates within its DMA may gain carriage on some cable systems, but lose carriage on others, as a result of market modification requests. A broadcaster may seek to add communities to its market which it can now reach from its new location, and, conversely, a cable system may seek to exclude communities from the broadcaster’s market that the station no longer serves as a result of its move. Because full power commercial stations have market-wide carriage rights, their movements within their assigned DMA should not automatically result in modification petitions, but unique factual situations may arise ... [and] it is thus possible that some cable operators may see a change in the local stations they must carry as a result of channel sharing agreements.¹⁴

The instant Petition involves a station that has recently relocated its facilities pursuant to a channel sharing arrangement arising from the incentive auction.¹⁵ Thus, as contemplated by the Commission, WRNN seeks to “add communities to its market which it can now reach from its new location,”¹⁶ which in this case were removed from its market in earlier market modification proceedings.¹⁷

B. The Petition

6. WRNN License Co. states that WRNN is an independent television station that has served the New York DMA for decades.¹⁸ The Petitioner states that the Station has invested significantly over the years to improve its coverage in the New York DMA and has been the subject of a number of regulatory proceedings.¹⁹ In 1996, the Cable Services Bureau granted in part and denied in part a petition filed by Comcast seeking to remove the Communities served by its New Jersey cable systems from

¹¹ 47 CFR § 76.59(b). Petitions for special relief to modify television markets that do not include the above evidence may be dismissed without prejudice and may be re-filed at a later date with the appropriate filing fee. *STELAR Market Mod Order*, 30 FCC Rcd at 10424, para. 22. The Bureau may waive the requirement to submit certain evidence for good cause shown, particularly if it is in a position to resolve the petition without such evidence. 47 CFR § 1.3; *Tobacco Valley Communications*, 31 FCC Rcd 8972, 8976 n.22 (MB 2016). Parties may submit whatever additional evidence they deem appropriate and relevant. *Id.*

¹² *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auction*, Report and Order, 29 FCC Rcd 6567, 6857, para. 708 (2014) (*Incentive Auction Report and Order*).

¹³ *Id.* at 6857, para. 709 (internal citations omitted).

¹⁴ *Id.* (internal citations omitted).

¹⁵ See *infra* paras. 7-9 (discussing WRNN’s channel sharing transition).

¹⁶ *Id.*

¹⁷ See *infra* para. 6 (discussing WRNN’s prior market modification that excluded the relevant New Jersey Communities).

¹⁸ Petition at 2. Petitioner states that WRNN signed on the air as WTZA in 1985. *Id.* at n.3.

¹⁹ *Id.*

WRNN's television market.²⁰ The Petitioner states that in granting the Petition, the Bureau focused on the Station's geographic distance from several of the Communities, the lack of historic cable carriage on any of the relevant Comcast cable systems, and its failure at the time to place a Grade A or B contour over the Communities.²¹

7. The Petitioner claims that the evidence presented in this proceeding weighs in favor of the requested market modification and that the considerations that previously resulted in the deletion of the Communities from WRNN's market no longer apply.²² The Petitioner asserts that the Communities are within WRNN's noise-limited service contour and the Station is geographically proximate to them.²³ The Petitioner credits WRNN's change in circumstances to a series of actions taken by the Station to improve its coverage in the Communities, beginning with a modification of its prior transmitter site in 2004,²⁴ and the more recent channel sharing arrangement with WWOR-TV, Secaucus, New Jersey (Facility ID No. 74197) (WWOR).²⁵ The Petitioner states that the 2004 transmitter site modification expanded WRNN's signal coverage in the DMA to include many of the Communities not reached at the time of the 1996 market modification.²⁶ The Petitioner asserts that WRNN substantially expanded its cable carriage in the DMA after that change, including in many of the subject Communities.²⁷ According to the Petitioner, WRNN's signal currently covers all of Bergen, Hudson, Middlesex, Morris, Monmouth, Somerset, and Union Counties and most of Hunterdon, Ocean, and Warren Counties.²⁸ The Petitioner adds that WRNN's new community of license, New Rochelle, New York, is closer to the Communities than its previous community of license.²⁹

8. With regard to its channel sharing arrangement with WWOR, the Petitioner points to recent, relevant precedent. The Petitioner cites the 2018 market modification decision involving Entravision, in which certain communities were added to television station WJAL's market.³⁰ WJAL, like WRNN, was a successful bidder in the incentive auction and entered into a channel sharing arrangement as a sharee that resulted in a transmitter site relocation and a change in community of license within the same DMA.³¹ Based on these changed circumstances, Entravision sought to add certain communities in the Washington, DC DMA served by Comcast and CoxCom to WJAL's market.³² Many

²⁰ *Petition of Comcast Cablevision of Monmouth County et al. for Modification of the ADI of Station WRNN-TV, Kingston, NY; Complaint of WRNN-TV Associates Limited Partnership Against Comcast Corporation*, Memorandum Opinion and Order, 11 FCC Rcd 6440 (CSB 1996).

²¹ *Id.* at 6448-50, paras. 20-25.

²² Petition at 3.

²³ *Id.*

²⁴ See FCC File No. BLCDDT-20040908AMF.

²⁵ See LMS File No. 0000053803.

²⁶ Petition at 3.

²⁷ *Id.*

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Entravision Holdings, LLC for Modification of the Television Market for Station WJAL(TV), Silver Spring, Maryland*, Memorandum Opinion and Order, 33 FCC Rcd 2215 (MB 2018) (*Entravision Order*).

³¹ Petition at 6.

³² *Id.* See *Entravision Holdings, LLC for Modification of the Television Market for Station WJAL(TV), Silver Spring, Maryland, Facility ID 10259*, Petition for Special Relief, MB Docket No. 17-306 (filed Nov. 7, 2017) (*Comcast Petition*); *Entravision Holdings LLC for Modification of the Television Market for Station WJAL(TV)*,

of these communities had been deleted from WJAL's market as a result of earlier market modification petitions filed by Comcast and CoxCom or their predecessors.³³ In granting Entravision's Petitions, the Media Bureau found that the historic carriage of WJAL's channel sharing partner weighed in favor of the requested modification.³⁴ The Bureau further found that evidence regarding WJAL's signal coverage, geographic proximity, and shopping and labor patterns weighed strongly in favor of a grant of the Petitions.³⁵ WRNN License Co. argues that these same factors weigh in favor of a grant of the instant Petition.³⁶

9. The Petitioner also points to its own recently granted petitions to add communities served by Spectrum and Altice to WRNN's market.³⁷ In both cases, the Media Bureau recognized the carriage by Spectrum and Altice of WRNN's channel sharing partner in the subject Communities along with carriage by those cable operators of other co-located and nearby stations, and weighed that in WRNN's favor in analyzing the historic carriage factor.³⁸ The Bureau similarly concluded that the second factor in those cases weighed in WRNN's favor, finding that signal coverage, geographic proximity, and shopping and labor patterns in relation to the Communities overcame the absence of local programming in WRNN's channel lineup.³⁹

III. DISCUSSION

10. Based on our consideration of the statutory factors as discussed below, we grant the Petition in full. As the Bureau explained in the *Entravision Order*, every market modification must be based on "the specific facts and circumstances presented in [the] proceeding."⁴⁰ The Bureau further stated that the *Entravision Order* "should not be interpreted as prejudging future market modifications filed by relocated channel sharing stations or affected cable systems."⁴¹ Accordingly, while we do not discount the relevance of the *Entravision Order*, the *WRNN-Spectrum Order*, or the *WRNN-Altice Order*, we evaluate this market modification request based on the specific facts and circumstances presented in this proceeding.

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Silver Spring, Maryland, Facility ID 10259, Petition for Special Relief, MB Docket No. 17-307 (filed Nov. 7, 2017) (*Cox Petition*) (collectively *Entravision Petitions*).

³³ *Id.*

³⁴ *Entravision Order*, 33 FCC Rcd at 2225, para. 15.

³⁵ *Id.* at 2229, para. 23.

³⁶ Petition at 7.

³⁷ See *Petition of WRNN License Company, LLC for Modification of the Television Market of Station WRNN-TV, New Rochelle, New York*, Memorandum Opinion and Order, 34 FCC Rcd 6446 (MB 2019) (*WRNN-Spectrum Order*); *Petition of WRNN License Company, LLC for Modification of the Television Market of Station WRNN-TV, New Rochelle, New York*, Memorandum Opinion and Order, MB Dkt. No. 20-26, DA 20-212 (rel. Mar. 2, 2020) (*WRNN-Altice Order*). See also Petition at 7.

³⁸ *WRNN-Spectrum Order* at 6452, para. 12; *WRNN-Altice Order* at 8, para. 14.

³⁹ *WRNN-Spectrum Order* at 6454, para. 18; *WRNN-Altice Order* at 11, para. 20.

⁴⁰ *Entravision Order*, 33 FCC Rcd at 2231, para. 28.

⁴¹ *Id.*

A. Statutory Factors

1. Historical Carriage

11. The first statutory factor we must consider is “whether the station, or other stations located in the same area, have been historically carried on the cable system or systems within such community.”⁴² The Petitioner states that WRNN has had extensive carriage within the Communities both by Comcast and other MVPDs.⁴³ Notwithstanding its prior market modification, the Petitioner asserts that “Comcast has in the past, and currently carries WRNN in the Communities, as evidenced by local channel lineup cards, spreadsheets, and maps.”⁴⁴ In addition, the Petitioner notes that WRNN is currently carried in the Communities by Verizon FiOS, DISH, DIRECTV, and others,⁴⁵ and that such carriage by competitors is relevant for purposes of the historic carriage factor.⁴⁶ The Petitioner further states that Comcast carries WRNN’s sharee station WWOR on all of its systems serving the Communities, and that Comcast carries a number of other stations that are co-located with WRNN and WWOR at One World Trade Center.⁴⁷ The Petitioner argues that WRNN would be an outlier among its peers and would be competitively disadvantaged if Comcast were to refuse to carry the Station.⁴⁸

12. We find that this first statutory factor weighs in favor of the requested modification. With regard to this statutory factor, the Petitioner has demonstrated that Comcast has in the past and currently carries WRNN in the Communities, and that WRNN is carried in the Communities by other MVPDs. Moreover, our precedent recognizes the relevance of carriage of co-located stations in a particular community.⁴⁹ Because Comcast is carrying WRNN’s channel sharing partner on all of its systems serving the Communities, as well as other co-located and nearby stations, we believe that WRNN would be at a competitive disadvantage if Comcast were to refuse to carry WRNN in the Communities.⁵⁰

⁴² 47 U.S.C. § 534(h)(1)(C)(ii)(I).

⁴³ Petition at 8.

⁴⁴ *Id.* at Exhibits B1 (Historic Comcast Channel Lineup Cards), B2 (Current Comcast Channel Lineup Cards), B3 (Historic Comcast Spreadsheets) and Exhibit D (Contour Maps). The Petitioner states that the information in Exhibit B3 derives from Kagan reports that WRNN maintains in its internal files. *Id.* at n.24. The Petitioner points out that as shown in Exhibit D, Belvidere in Warren County and Stockton in Hunterdon County lie just outside of WRNN’s 41 dBu contour. Additionally, the Petitioner notes that White and Franklin in Warren County and Delaware and Bethlehem in Hunterdon County are partially covered by the contour. The Petitioner asserts that the Commission previously found that similar coverage did not preclude market modification. *Id.*, referencing n.65 *infra*.

⁴⁵ *Id.* at 9 and Exhibit C (other MVPD Lineup Cards).

⁴⁶ *Id.* at n.25 (citing *Petition for Modification of Philadelphia, PA Designated Market Area With Regard to Station WACP, Atlantic City, NJ*, Memorandum Opinion and Order, 29 FCC Rcd 1835, 1845, para. 19, n.77 (MB 2014)).

⁴⁷ Petition at 10 and Exhibit B2 (Comcast Cable Lineup Card). For example, the Petitioner points out that Comcast carries WABC(DT), WCBS-TV, WNBC(DT), WNET(DT), and WPXN-TV, all of which broadcast from One World Trade Center. *Id.* at n.31.

⁴⁸ *Id.*

⁴⁹ *WRNN-Spectrum Order*, 34 FCC Rcd at 6451, para. 10; *WRNN-Altice Order* at 7, para. 12. See also *Entravision Order*, 33 FCC Rcd at 2225, para. 15; *Woods Communications Corporation*, Memorandum Opinion and Order, 32 FCC Rcd 6597, 6600, para. 6 (MB 2017) (citing *Tennessee Broadcasting Partners*, Memorandum Opinion and Order, 23 FCC Rcd 3928, 3934, para. 10 (MB 2008)) (finding that carriage of a competing station in the same community provides evidence to support market modification).

⁵⁰ See *Entravision Order*, 33 FCC Rcd at 2225, para. 15 (“Because Comcast and Cox carry WUSA, along with every

2. Local Service

13. Second, we consider “whether the television station provides coverage or other local service to such community.”⁵¹ This statutory factor can be satisfied by demonstrating the Station’s signal coverage, its geographic proximity to the Communities, its shopping and labor patterns between the Station and the Communities, as well as locally-focused programming broadcast by the Station. Less significance, however, may be accorded to locally-focused programming when these other factors evidence a sufficient nexus to the Communities.⁵²

14. The Petitioner asserts that WRNN’s signal contour supports the inclusion of the Communities in the Station’s market. Regarding contour and signal strength, the Petitioner states that WRNN’s 41 dBu noise-limited service contour “clearly encompasses most of the Communities.”⁵³ The Petitioner submits maps showing WRNN’s current signal contour in relation to the Communities and the relevant Comcast headends,⁵⁴ which, according to the Petitioner, demonstrate that WRNN’s signal contour covers all or part of each of the relevant counties and most of the Communities in each cable system.⁵⁵ Moreover, the Petitioner states that WRNN’s coverage of the Communities is nearly identical

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other full-power television station in the area, we believe that WJAL would be at a competitive disadvantage if these cable operators did not also carry WJAL in the Communities.”); *WRNN-Spectrum Order*, 34 FCC Rcd at 6452, para. 12 (“Because Spectrum is carrying WRNN’s channel sharing partner on its Bergen County system . . . [and] since Spectrum also carries other co-located and nearby stations, we believe that WRNN would be at a competitive disadvantage if Spectrum did not carry WRNN in the Communities.”). See also *WRNN-Altice Order* at 8, para. 14. The Petitioner also notes that while the Bureau determined in the *WRNN-Spectrum Order* and in the *WRNN-Altice Order* that it need not accord WRNN new station status in order to properly analyze its market modification petitions, “it nevertheless ‘consider[ed] the Station’s dramatic change in circumstances due to its change in community of license and transmitter site relocation as mitigating circumstances with respect to the Station’s lack of historic carriage.’” *WRNN-Spectrum Order* at 6452, para. 12; *WRNN-Altice Order* at 8, para. 14. We need not look to mitigating circumstances in this case due to WRNN’s historic carriage on the Comcast systems.

⁵¹ 47 U.S.C. § 534(h)(1)(C)(ii)(II).

⁵² See *WRNN-Spectrum Order*, 34 FCC Rcd at 6454-55, para. 18.

⁵³ Petition at 11.

⁵⁴ *Id.* at Exhibit D (Contour Maps – WRNN). The Petitioner states that the locations of the cable headends are no longer publicly available through the cable operators’ public inspection files. However, we are informed that WRNN License Co. maintains in its internal files a list of Comcast headends obtained in 2018, and those headend locations are depicted on the maps provided in Exhibit D. The Petitioner further states that “[g]iven the number of Communities at issue, including all of the Communities on a single map would have rendered the map illegible.” Petition at n.40. In that regard, the Petitioner provides “an overview map identifying all of the counties and systems in which the Communities are located and more detailed maps reflecting the location of each of the Communities.” *Id.* at n.40 and Exhibit D. The detailed maps of the WRNN-TV “Longley-Rice 41dBu f(50,90) Coverage” of the Comcast Communities are those located in Warren County, NJ, Union County, NJ, Somerset County, NJ, Ocean County, NJ, Morris County, NJ, Monmouth County, NJ, Middlesex County, NJ, Hunterdon County, NJ, Hudson County, NJ and Bergen County, NJ. *Id.*

⁵⁵ *Id.*

to the other major stations co-located on One World Trade Center⁵⁶ – all of which are deemed local to the Communities.⁵⁷

15. The Petitioner also contends that WRNN is geographically proximate to the Communities.⁵⁸ The Petitioner submits information that reflects the driving and “as the crow flies” distances from WRNN’s transmitter and community of license to each of the Communities,⁵⁹ as well as terrain maps showing the distances to a sample Community in each Comcast system.⁶⁰ The Petitioner states that the furthest Community in any of the relevant systems is less than 77 miles as the crow flies from the community of license, New Rochelle, and the closest Community is 15.47 miles from New Rochelle.⁶¹ In terms of driving distance, the Petitioner states that the furthest Community is about 86 miles from New Rochelle, while the closest Community is about 20 miles away.⁶² Regarding the transmitter site, the Petitioner notes that the furthest Community is 57.94 miles away as the crow flies and 69.8 miles driving, while the closest Community is 2.4 miles as the crow flies and 4.09 miles driving.⁶³ The Petitioner asserts that the above-noted distances are comparable to distances that were previously found geographically proximate to the station at issue in other market modification cases.⁶⁴

⁵⁶ The Petitioner states that even before its move to One World Trade Center, WRNN’s 41 dBu noise-limited service contour encompassed many of the Communities as a result of its 2004 transmitter site modification. See FCC File No. BLCDDT-20040908AMF. *Id.* at n.41.

⁵⁷ Petition at 12 and Exhibit E (Contour Map of Stations Located at One World Trade Center). The Petitioner states that in the *WRNN-Altice Order*, the Bureau noted that after examining its submission of maps that “there are a number of Communities that are not encompassed within the WRNN-DT Longley-Rice 41+ DBU Coverage of Altice Communities in Suffolk County, NY and there is one Community in Ocean County, NJ that is not within the 41+ DBU coverage.” *WRNN-Altice Order* at 11, n.82. Nonetheless, the Petitioner notes that the Bureau determined that because the stations co-located with WRNN were carried by Altice in the communities at issue, “WRNN would be an outlier if we did not treat all of these stations the same in these circumstances.” *Id.* In the instant case, the Petitioner asserts that “almost all of the Communities are encompassed by WRNN’s 41 dBu contour, providing even stronger evidence of WRNN’s service to the Communities than the evidence the FCC found sufficient in *Altice*.” Petition at n.42.

⁵⁸ Petition at 13 and Exhibit D.

⁵⁹ *Id.* at Exhibit F (Distances). The Petitioner notes that Exhibit F also provides as the crow flies distances for both the closest and furthest Community in each system and the average of those figures. *Id.* at n.45.

⁶⁰ *Id.* at Exhibit G (Terrain Maps and Crow Flies Distances).

⁶¹ *Id.* at 14 and Exhibit F.

⁶² *Id.*

⁶³ *Id.*

⁶⁴ *Id.* (citing *WRNN-Altice Order* at 9, para. 17 (adding a community that was 101.7 miles away from New Rochelle); *In re KJLA, LLC for Modification of the Television Market for Station KJLA-DT, Ventura, California*, Memorandum Opinion and Order, 26 FCC Rcd 12652, para. 11 (MB 2011) (modifying KJLA’s market to include communities located between 64 and 108 miles from the station’s community of license); *KNTV License, Inc.*, 16 FCC Rcd 6785 (2001) (adding communities that were 35-55 miles away); *Paxson Atlanta License, Inc.*, 13 FCC Rcd 20087 (1998) (adding communities that were 50 miles away); *Burnham Broadcasting, Inc.*, 10 FCC Rcd 7117 (1997) (adding a community that was 48 miles away); *Time Warner Cable*, 11 FCC Rcd 8047 (1996) (refusing to delete communities that were 60 miles away); *Cablevision Systems Corporation*, 11 FCC Rcd 6453 (1996) (refusing to delete communities that were 48-55 miles away); *Time Warner Cable*, 11 FCC Rcd 3510 (1996) (refusing to delete communities that were 45 miles away)).

16. Additionally, the Petitioner addresses shopping and labor patterns and maintains that WRNN's community of license shares strong economic connections with the Communities.⁶⁵ The Petitioner observes that New Rochelle and the Communities are part of the larger New York/New Jersey Metropolitan area and are connected by a large number of interstate and state highways, in addition to public transportation. In particular, the Communities are all part of New York/New Jersey's interconnected public transportation system, which connects New Rochelle and most of the Communities through Penn Station.⁶⁶ The Petitioner also asserts that New Rochelle is easily accessible by car from any of the Communities.⁶⁷

17. Moreover, the Petitioner states that New Rochelle has numerous businesses and shopping outlets, as well as entertainment and sports venues that attract residents from the New York/New Jersey metropolitan area, including the Communities.⁶⁸ In addition, the Petitioner asserts that U.S. Census Data shows that New Rochelle and the Communities share many common characteristics.⁶⁹ As an example, the Petitioner notes that the average commuting time in New Rochelle and Communities in each of the relevant cable systems is around 30 minutes, reflecting the interconnected and interdependent nature of the New York/New Jersey Metropolitan Area.⁷⁰ Additionally, the Petitioner observes that health care and social assistance are among the top three industries in New Rochelle and many of the Communities.⁷¹ Regarding travel, the Petitioner points out that Long Beach Island in Ocean County is a popular beach vacation destination for New York residents, including those from New Rochelle.⁷² Further demonstrating the interconnected nature of the New York/New Jersey Metropolitan Area, the Petitioner notes that MetLife Stadium, located in East Rutherford, New Jersey and home to the New York Jets and New York Giants, is also a draw for New Rochelle residents.⁷³ The Petitioner asserts that these illustrative examples demonstrate the interconnection between New Rochelle and the Communities and therefore support weighing the second statutory in favor of the requested modification.⁷⁴

18. We find that the second statutory factor weighs in favor of WRNN's Petition. The substantial evidence regarding WRNN's signal coverage,⁷⁵ geographic proximity, and shopping and labor

⁶⁵ *Id.* at 15.

⁶⁶ *Id.* (referring to John Schettino, *The New York Penn Station Atlas* (2015), <http://pennstationatlas.com/book/>).

⁶⁷ *Id.* and Exhibit H (Driving and Public Transportation Routes). The Petitioner notes, however, that a substantial number, but not all, of the Communities are accessible by public transportation from either New Rochelle or One World Trade Center. *Id.* at n.49.

⁶⁸ *Id.* at Exhibit J (New Rochelle Chamber of Commerce Business Directory).

⁶⁹ *Id.* at 17 (citing Data USA, <http://datausa.io/>).

⁷⁰ *Id.*

⁷¹ *Id.*

⁷² *Id.* at 16. Specifically, a recent study funded by the Southern Ocean County Chamber of Commerce showed that a majority of visitors to the Long Beach Island region are from New York state, with a significant portion coming from Westchester County. *Id.* at Exhibit K2 (A Profile of the Long Beach Island Region Visitor).

⁷³ *Id.* at 17. The Petitioner notes that the Metro-North train makes it particularly easy for residents of New Rochelle to travel to MetLife and the Meadowlands Sports Complex. *Id.*

⁷⁴ *Id.* at 18.

⁷⁵ We note that pursuant to the Petitioner's submission of maps in Exhibit D, WRNN's 41 dBu noise-limited service contour encompasses most of the Communities. Additionally, however, we note that as demonstrated by Exhibit E, WRNN's coverage of the Communities is nearly identical to the other major stations co-located on One World Trade Center. The noted stations are WABC(DT), WCBS-TV, WNBC(DT), WNET(DT), and WPXN-TV, all of which are deemed local to the Communities. As such, we find that WRNN would be an outlier if we did not treat all

patterns in relation to the Communities conclusively demonstrates WRNN's coverage and local service to the Communities. Although we note that WRNN airs, almost exclusively, general interest programming such as "regional and international news, paid programming, and syndicated programming," rather than locally relevant programming,⁷⁶ we accord less significance to this factor given that the other factors evidence a sufficient nexus to the Communities.

3. Promoting Consumer Access to Local Stations

19. The third statutory factor we consider is "whether modifying the market of the television station would promote consumers' access to television broadcast station signals that originate in their State of residence."⁷⁷ This factor is intended to ensure that MVPD subscribers are "receiving news, politics, sports, emergency information, and other television programming relevant to their home state" and "relevant to their everyday lives."⁷⁸ A petitioner is considered to satisfy this factor if the involved station is licensed to a community within the same state as the new community.⁷⁹ This factor may be given increased weight if the station provides programming specifically related to subscribers' state of residence, and may be given even more weight if subscribers in the existing market have little or no access to such in-state programming.⁸⁰ However, this in-state factor was not intended to bar a market modification because it did not result in increased consumer access to an in-state station's programming.⁸¹ In such cases, the Commission determined that the "in-state factor would be inapplicable and the modification request would be evaluated based on the other statutory factors."⁸²

20. We assign no weight to this factor with regard to the Communities. WRNN is licensed to New Rochelle, New York and broadcasts from a transmitter located on top of One World Trade Center in Lower Manhattan, whereas the Communities are located in New Jersey, and thus the in-state factor does not apply.

4. Carriage of Other Eligible Stations

21. Fourth, we consider "whether any other television station that is eligible to be carried by a cable system in such community in fulfillment of the requirements of this section provides news coverage of issues of concern to such community or provides carriage or coverage of sporting and other events of interest to the community."⁸³ In general, this factor is interpreted as enhancing a station's market modification petition if other stations do not sufficiently serve the communities at issue; however, other stations' service to the communities rarely has counted against a petition.⁸⁴ The Petitioner states

(...continued from previous page)
of these stations similarly.

⁷⁶ *Id.* at 19. With respect to locally relevant programming, Petitioner identifies only a few episodes of a nightly talk show.

⁷⁷ 47 U.S.C. § 534(h)(1)(C)(ii)(III).

⁷⁸ *STELAR Market Mod. Order*, 30 FCC Rcd at 10407, para. 1, 10420, para. 18 (citing Report from the Senate Committee on Commerce, Science, and Transportation accompanying S. 2799, 113th Cong., S. Rep. No. 113-322, at 11 (2014)).

⁷⁹ *Id.* at 10420, para. 18.

⁸⁰ *Id.*

⁸¹ *Id.* at 10421, para. 19.

⁸² *Id.*

⁸³ 47 U.S.C. § 534(h)(1)(C)(ii)(IV).

⁸⁴ See *Petition for Modification of Dayton, OH Designated Mkt. Area with Regard to Television Station WHIO-TV*,

that “[u]pon information and belief, Comcast’s systems serving each of the Communities carry other television stations that provide coverage of news, sports, and other issues of interest to the Communities.”⁸⁵ Accordingly, consistent with our precedent, we assign no weight to this factor.

5. Viewing Patterns

22. The fifth statutory factor focuses on “evidence of viewing patterns” in cable and noncable households “within the areas served by” the cable system or systems in such community.⁸⁶ The Petitioner states that WRNN “still does not subscribe to Nielsen or any other ratings service and has requested, but did not receive, permission to utilize published audience data relevant to this factor.”⁸⁷ However, the Petitioner states that the Station has sold advertising time to several advertisers located in and around the Communities.⁸⁸ Furthermore, the Petitioner asserts that “WRNN’s direct response media provider does maintain logs of orders received in response to programming broadcast on WRNN, which have included numerous orders from the Communities – evidencing WRNN’s viewership in those [C]ommunities.”⁸⁹ In addition, as previously noted, the Petitioner states that WRNN’s market was previously modified to exclude the relevant Communities.⁹⁰ The Petitioner further states that although WRNN has gradually improved its coverage in the Communities, Comcast has only carried WRNN in all of the Communities since January 2019.⁹¹ In that regard, the Petitioner asserts that to the extent that the Bureau may consider WRNN’s viewership to be low or nonexistent, it should consider that level of viewership to be unsurprising, and therefore, according to the Petitioner, this factor should then be accorded limited weight.⁹² Moreover, the Petitioner asserts that the Station’s recent modifications to its community of license, transmitter site relocation, and signal coverage improvement should be viewed as mitigating circumstances with respect to any lack of viewership in the Communities.⁹³ The Petitioner asserts that

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Dayton, OH, Memorandum Opinion and Order, 28 FCC Rcd 16011, 16019, para. 22 (MB 2013). *See also Tennessee Broadcasting Partners*, 23 FCC Rcd at 3947, para. 49.

⁸⁵ Petition at 21.

⁸⁶ 47 U.S.C. § 534(h)(1)(C)(ii)(V).

⁸⁷ Petition at 21. The Petitioner has requested a waiver of the requirement of 47 CFR § 76.59(b)(6) to provide published audience data for the Station. We waive this rule to the extent necessary because the Petitioner, although unsuccessful, made the effort to secure such published audience data and submitted in the alternative WRNN Direct Response Logs and information regarding the sale of advertising time to local advertisers, as evidence of viewership. We are otherwise directed to dismiss without prejudice at the outset of the proceeding petitions that fail to either include all required supporting evidence, or reflect at least an effort to obtain the evidence. *See La Plata County, Colorado Petitions for Modification of the Satellite Television Markets of KDVR-TV, KCNC-TV, KMGH-TV, and KUSA-TV, Denver, Colorado*, Memorandum Opinion and Order, 34 FCC Rcd 5030, 5038, para. 16 (2019).

⁸⁸ *Id.* at 22. The Petitioner states that those advertisers include Dr. Marlen Martirosian, DDS, River Edge, New Jersey (Bergen County), Dr. John Minichetti, DDS, Englewood, New Jersey (Bergen County), and Dr. Jonathan Abenaim, DMD, Hawthorne, New Jersey (Passaic County). The aggregate amount spent by these advertisers to reach WRNN’s audience was approximately \$309,250 in 2019 and is expected to be approximately \$250,000 in 2020. *Id.*

⁸⁹ *Id.* and Exhibit N (WRNN Direct Response Order Logs).

⁹⁰ *Id.*; *see supra* para. 6 (discussing WRNN’s previous market modification history).

⁹¹ *Id.*

⁹² *Id.* (citing *Entravision Order* at 2231, para. 27; *WRNN-Spectrum Order* at 6456, para. 23).

⁹³ *Id.* at 22-23.

this factor should either weigh in favor of WRNN, or be afforded limited weight.⁹⁴

23. We find that WRNN's recent changed circumstances regarding its community of license and transmitter site relocation and improved signal coverage are mitigating circumstances with respect to any lack of viewership in the Communities. We also recognize Petitioner's evidence of direct sales to viewers in the Communities, as well as the sale of some advertising time to advertisers in the area, and the demonstrated effort to provide additional evidence of viewership within the Communities. In light of these circumstances, we find that the fifth statutory factor weighs in favor of WRNN License Co.'s modification request.

6. Conclusion

24. We conclude that the facts support the grant of the Petitioner's request to modify the market of Station WRNN-TV, New Rochelle, New York, to include all of the Communities served by Comcast's systems in the following New Jersey counties: Bergen County, Hudson County, Hunterdon County, Middlesex County, Morris County, Monmouth County, Ocean County, Somerset County, Union County, and Warren County.⁹⁵ We find that the first, second, and fifth statutory factors weigh in favor of the market modification request. We assign no weight to the third and fourth statutory factors. For the reasons discussed herein, we grant the Petition. Finally, we note that the decision to modify WRNN's market to include the Communities is based on the specific facts and circumstances presented in this proceeding. It should not be interpreted as prejudging future market modifications filed by relocated channel sharing stations or affected cable systems. All market modifications are evaluated on the specific facts and circumstances presented in those proceedings, including those arising from channel sharing as expressly contemplated by the Commission in the *Incentive Auction Report and Order*.⁹⁶

IV. ORDERING CLAUSES

25. Accordingly, **IT IS ORDERED**, pursuant to Section 614(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 534, and Section 76.59 of the Commission's rules, 47 CFR § 76.59, that the captioned Petition for Special Relief (MB Docket No. 20-153, CSR 8990-A) filed by WRNN License Company, LLC **IS GRANTED**.

26. This action is taken pursuant to authority delegated by Section 0.283 of the Commission's rules.⁹⁷

FEDERAL COMMUNICATIONS COMMISSION

Steven A. Broecker
Senior Deputy Chief, Policy Division, Media Bureau

⁹⁴ *Id.* at 23.

⁹⁵ See Addendum (listing all affected Communities).

⁹⁶ See *supra* para. 5 (citing *Incentive Auction Report and Order*, 29 FCC Rcd at 6857, para. 709).

⁹⁷ 47 CFR § 0.283.

ADDENDUM¹**PSID 000816 – Comcast Cablevision of Monmouth County**

CUID	COUNTY	COMMUNITY NAME	LEGAL NAME
NJ0132	Monmouth	Eatontown*	Comcast of Monmouth County LLC
NJ0155	Monmouth	Monmouth Beach*	Comcast of Monmouth County LLC
NJ0156	Monmouth	Sea Bright*	Comcast of Monmouth County LLC
NJ0157	Monmouth	West Long Branch*	Comcast of Monmouth County LLC
NJ0158	Monmouth	Oceanport*	Comcast of Monmouth County LLC
NJ0206	Monmouth	Little Silver*	Comcast of Monmouth County LLC
NJ0274	Monmouth	Shrewsbury*	Comcast of Monmouth County LLC
NJ0275	Monmouth	Shrewsbury*	Comcast of Monmouth County LLC
NJ0362	Monmouth	Middletown*	Comcast of Monmouth County LLC
NJ0363	Monmouth	Atlantic Highlands*	Comcast of Monmouth County LLC
NJ0405	Monmouth	Hazlet*	Comcast of Monmouth County LLC
NJ0433	Monmouth	Red Bank*	Comcast of Monmouth County LLC
NJ0434	Monmouth	Tinton Falls*	Comcast of Monmouth County LLC
NJ0435	Monmouth	Fair Haven*	Comcast of Monmouth County LLC
NJ0436	Monmouth	Long Branch*	Comcast of Monmouth County LLC
NJ0464	Monmouth	Highlands*	Comcast of Monmouth County LLC
NJ0469	Monmouth	Rumson*	Comcast of Monmouth County LLC
NJ0470	Monmouth	Allenhurst*	Comcast of Monmouth County LLC
NJ0471	Monmouth	Deal*	Comcast of Monmouth County LLC
NJ0472	Monmouth	Fort Monmouth*	Comcast of Monmouth County LLC
NJ0473	Monmouth	Loch Arbour*	Comcast of Monmouth County LLC
NJ0474	Monmouth	Freehold*	Comcast of Monmouth County LLC
NJ0487	Monmouth	Holmdel*	Comcast of Monmouth County LLC

PSID 000205 – Comcast Cablevision of Northwest New Jersey

CUID	COUNTY	COMMUNITY NAME	LEGAL NAME
NJ0009	Warren	Hackettstown*	Comcast of Northwest New Jersey LLC
NJ0011	Warren	Mansfield*	Comcast of Northwest New Jersey LLC
NJ0012	Morris	Mount Olive*	Comcast of Northwest New Jersey LLC
NJ0039	Hunterdon	Glen Gardner*	Comcast of Northwest New Jersey LLC
NJ0040	Hunterdon	Hampton*	Comcast of Northwest New Jersey LLC
NJ0041	Hunterdon	Lebanon*	Comcast of Northwest New Jersey LLC
NJ0042	Warren	Washington*	Comcast of Northwest New Jersey LLC
NJ0043	Warren	Washington*	Comcast of Northwest New Jersey LLC
NJ0078	Hunterdon	High Bridge*	Comcast of Northwest New Jersey LLC
NJ0079	Warren	Franklin*	Comcast of Northwest New Jersey LLC
NJ0080	Morris	Washington*	Comcast of Northwest New Jersey LLC
NJ0115	Warren	Belvidere*	Comcast of Northwest New Jersey LLC
NJ0116	Warren	Oxford*	Comcast of Northwest New Jersey LLC

¹ The Petitioner notes that all Communities denoted by an asterisk next to their names were included in the prior market modification. See *In Re: Petition of Comcast Cablevision of Monmouth County et al.*, Memorandum Opinion and Order, 11 FCC Rcd 6440 (1996).

NJ0240	Warren	White*	Comcast of Northwest New Jersey LLC
NJ0314	Warren	Independence*	Comcast of Northwest New Jersey LLC
NJ0502	Warren	Liberty*	Comcast of Northwest New Jersey LLC
NJ0555	Hunterdon	Califon*	Comcast of Northwest New Jersey LLC

PSID 003419 – Comcast Cablevision of Ocean County

CUID	COUNTY	COMMUNITY NAME	LEGAL NAME
NJ0049	Ocean	Bay Head*	Comcast of Ocean County LLC
NJ0050	Ocean	Brick Town*	Comcast of Ocean County LLC
NJ0051	Ocean	Mantoloking*	Comcast of Ocean County LLC
NJ0052	Ocean	Point Pleasant *	Comcast of Ocean County LLC
NJ0053	Ocean	Point Pleasant Beach*	Comcast of Ocean County LLC

PSID 005140 – Comcast of Cablevision of the Plainfields

CUID	COUNTY	COMMUNITY NAME	LEGAL NAME
NJ0124	Somerset	North Plainfield*	Comcast of Plainfield LLC
NJ0126	Union	Plainfield*	Comcast of Plainfield LLC
NJ0130	Middlesex	South Plainfield*	Comcast of Plainfield LLC

PSID 000552 – Comcast Cablevision of the Meadowlands

CUID	COUNTY	COMMUNITY NAME	LEGAL NAME
NJ0294	Bergen	Rutherford*	Comcast of the Meadowlands LLC
NJ0295	Bergen	East Rutherford*	Comcast of the Meadowlands LLC
NJ0296	Bergen	Carlstadt*	Comcast of the Meadowlands LLC
NJ0297	Bergen	Lyndhurst*	Comcast of the Meadowlands LLC
NJ0298	Bergen	North Arlington*	Comcast of the Meadowlands LLC
NJ0299	Hudson	Kearny*	Comcast of the Meadowlands LLC
NJ0300	Hudson	East Newark*	Comcast of the Meadowlands LLC
NJ0382	Bergen	Wallington*	Comcast of the Meadowlands LLC

PSID 002641 – Comcast Cablevision of Central New Jersey²

CUID	COUNTY	COMMUNITY NAME	LEGAL NAME
NJ0021	Middlesex	East Brunswick*	Comcast Cablevision of Central NJ Inc.
NJ0344	Middlesex	Plainsboro*	Comcast Cablevision of Central NJ Inc.
NJ0372	Middlesex	Monroe*	Comcast Cablevision of Central NJ Inc.
NJ0397	Mercer	East Windsor*	Comcast Cablevision of Central NJ Inc.
NJ0414	Mercer	Hightstown*	Comcast Cablevision of Central NJ Inc.
NJ0437	Middlesex	Cranbury*	Comcast Cablevision of Central NJ Inc.
NJ0438	Middlesex	Jamesburg*	Comcast Cablevision of Central NJ Inc.

² The Petitioner states that according to the FCC's COALS data base this system includes several Communities located in counties assigned to the Philadelphia DMA, including East Windsor, Hightstown, and West Windsor (the Mercer County Communities). Because the Mercer County Communities were in the prior market modification, WRNN License Co. includes them in this Petition out of an abundance of caution. However, WRNN License Co. only seeks to include the Mercer County Communities in WRNN's market to the extent necessary to ensure that WRNN's market includes all Communities in counties assigned to the New York DMA.

NJ0439	Middlesex	Helmetta*	Comcast Cablevision of Central NJ Inc.
NJ0440	Middlesex	Spotswood*	Comcast Cablevision of Central NJ Inc.
NJ0441	Middlesex	South Brunswick*	Comcast Cablevision of Central NJ Inc.
NJ0508	Monmouth	Roosevelt*	Comcast Cablevision of Central NJ Inc.
NJ0530	Mercer	West Windsor*	Comcast Cablevision of Central NJ Inc.
NJ0010	Hunterdon	Lambertville	Comcast of Southeast Pennsylvania Inc.
NJ0463	Somerset	Hillsborough	Comcast of Central New Jersey II, LLC
NJ0491	Hunterdon	Lebanon	Comcast of Central New Jersey II, LLC
NJ0492	Hunterdon	Clinton	Comcast of Central New Jersey II, LLC
NJ0493	Hunterdon	Readington	Comcast of Central New Jersey II, LLC
NJ0494	Hunterdon	Clinton	Comcast of Central New Jersey II, LLC
NJ0495	Morris	Long Hill	Comcast of Central New Jersey II, LLC
NJ0504	Somerset	Branchburg	Comcast of Central New Jersey II, LLC
NJ0505	Somerset	Bernardsville	Comcast of Central New Jersey II, LLC
NJ0506	Hunterdon	Flemington	Comcast of Central New Jersey II, LLC
NJ0507	Hunterdon	Raritan	Comcast of Central New Jersey II, LLC
NJ0509	Morris	Chatham	Comcast of Central New Jersey II, LLC
NJ0510	Somerset	Franklin	Comcast of Central New Jersey II, LLC
NJ0546	Morris	Mendham	Comcast of Central New Jersey II, LLC
NJ0547	Somerset	Peapack-Gladstone	Comcast of Central New Jersey II, LLC
NJ0565	Morris	Mendham	Comcast of Central New Jersey II, LLC
NJ0572	Somerset	Bedminster	Comcast of Central New Jersey II, LLC
NJ0573	Morris	Chester	Comcast of Central New Jersey II, LLC
NJ0574	Morris	Chester	Comcast of Central New Jersey II, LLC
NJ0575	Hunterdon	Tewksbury	Comcast of Central New Jersey II, LLC
NJ0576	Somerset	Montgomery	Comcast of Central New Jersey II, LLC
NJ0577	Somerset	Rocky Hill	Comcast of Central New Jersey II, LLC
NJ0583	Morris	Harding	Comcast of Central New Jersey II, LLC
NJ0586	Hunterdon	East Amwell	Comcast of Central New Jersey II, LLC
NJ0591	Hunterdon	Franklin	Comcast of Central New Jersey II, LLC
NJ0592	Hunterdon	Stockton	Comcast of Southeast Pennsylvania Inc.
NJ0593	Hunterdon	West Amwell	Comcast of Southeast Pennsylvania Inc.
NJ0597	Hunterdon	Union	Comcast of Central New Jersey II, LLC
NJ0601	Somerset	Millstone	Comcast of Central New Jersey II, LLC
NJ0602	Hunterdon	Bethlehem	Comcast of Central New Jersey II, LLC
NJ0607	Hunterdon	Delaware	Comcast of Southeast Pennsylvania Inc.
NJ0611	Hunterdon	Delaware	Comcast of Central New Jersey II, LLC
NJ0616	Somerset	Far Hills	Comcast of Central New Jersey II, LLC

PSID 011053 – Comcast Cablevision of Jersey City

CUID	COUNTY	COMMUNITY NAME	LEGAL NAME
NJ0558	Hudson	Jersey City*	Comcast of Jersey City LLC