



MARTIN D. FRANKS
EXECUTIVE VICE PRESIDENT
PLANNING, POLICY AND
GOVERNMENT RELATIONS

CBS CORPORATION
51 WEST 52 STREET
NEW YORK, NEW YORK 10019-6188
(212) 975-5245
FAX: (212) 975-6035
mdfranks@cbs.com

Response

Archive
cc: 2/25
A Levine

November 25, 2008

The Honorable John D. Dingell
Chairman
Committee on Energy and Commerce
United States House of Representatives
Washington, DC 20515-6115

The Honorable Edward J. Markey
Chairman
Subcommittee on Telecommunications and the Internet
Committee on Energy and Commerce
United States House of Representatives
Washington, DC 20515-6115

Dear Chairmen Dingell and Chairman Markey:

I write to you in response to your letter of November 7, 2008 to Leslie Moonves relating to lessons that CBS¹ has learned from the Wilmington, North Carolina DTV transition test and steps we plan to take to help make the transition to all-digital on February 17, 2009 a smooth one. With CBS's pioneering history and leadership in DTV and its financial and engineering commitment to the technology, we are motivated to ensure that America's viewers can access CBS's high quality service and continue to receive all of our digital entertainment, sports and news programming for free, over the air, and without interruption as broadcast television exits the analog world.

Eleven years ago, in 1997, CBS's owned-and-operated New York station, WCBS-TV, launched its digital over-the-air television service. A year later, the CBS Television Network aired three NFL games in High Definition, as well as John Glenn's return to space and the Winter Olympic Games in Nagano, Japan. By the 1999-2000 season, a full decade before the scheduled analog turn-off date, CBS provided all of its prime-time dramas and comedies and NCAA football games in HD. Today, almost all of the CBS Network programming is transmitted in HD, and CBS's owned stations in New York, Philadelphia, San Francisco, Los Angeles and Chicago produce their local news in HD.

Over the last few months, CBS has added even more HD to its schedule of news, sports and entertainment programming. CBS News now airs *60 Minutes* and *The Evening News*

¹ CBS Television Network and CBS Television Stations group, divisions of CBS Corporation, are most directly involved in the digital transition. A list of CBS Television Stations group 29 stations is contained in Appendix A.

with *Katie Couric* in HD. *Survivor* and *The Price is Right* are broadcast in HD. And all NFL games and all PGA tournaments are aired in HD.

It is against this backdrop that CBS endeavors to move the transition to a successful conclusion. In so doing, we believe, especially in light of the test in Wilmington, that the tasks needed to convert the nation to digital television are a shared responsibility of all affected stakeholders, including the Government. Broadcasters, we believe, shoulder the primary burden of helping to ensure that viewers of their respective stations in their respective markets are kept informed about the switchover to digital. The cooperative efforts thus far have been unparalleled. Here are some examples:

- **Market-wide cooperation:** The management teams of the local CBS stations have been working closely with their counterparts at other stations in their markets, who are normally their fierce competitors. They discuss, along with multichannel video programming providers (MVPDs), retailers and other stakeholders, ways of coordinating on technical and consumer education issues. Most notably, almost every CBS owned and operated station –spanning 18 television markets-- has conducted or will conduct “readiness” tests. These tests, otherwise known as “soft” analog turn-offs, are undertaken either unilaterally or, most often, on a market-wide basis with all other stations. During the tests, our television stations actually turn off analog operations for up to a few minutes as a way to warn viewers about the “hard,” or final, digital turn-off in February and direct them to a telephone or Internet contact for information. These readiness tests also provide an opportunity for us to identify potential technical issues. MVPDs, including cable and DBS operators and telcos, play a critical role in this coordinated effort.
- **Congressional cooperation:** While broadcasters are closely in tune with their markets and viewers, Members of Congress have unique contacts that prove invaluable in the mission of educating the public about the digital transition --in a cooperative manner.

For example, last May, Chairman Dingell led a tele-town hall meeting in his district with constituents. In addition to his work on issues including energy security and global warming, universal healthcare, foreclosures and the war in Iraq, he focused on DTV transition matters. He also set up a converter box and antenna demonstration event at a senior citizens center in his district last March.

Likewise in the Boston market, our WBZ-TV and WSBK-TV have worked in concert with Chairman Markey to coordinate community outreach efforts. He and his office will be critical in helping us target viewers in each community who need to be reached with specific antenna, scanning, signal coverage and converter box coupon information.

- **FCC cooperation:** The FCC announced late this summer a nationwide initiative to increase awareness about the digital transition. As part of that initiative, the five commissioners and their staffs were assigned to visit multiple television markets –all those in which more than 100,000 or at least 15% of the households rely solely on broadcast signals for television-- and to work with local broadcasters and area constituencies. Our stations have actively participated in these commissioner visits, hosted market-wide broadcaster meetings for these visits, and produced and aired news stories relating to the visits. It has been extremely helpful for broadcasters, normally robust competitors, to be gathered together to discuss and brainstorm cooperative efforts for educating their viewers.

As to specific questions you pose relating to the rescanning of converter boxes, antenna issues and signal contour issues, here are our responses:

Rescanning Converter Boxes: Our CBS engineers were keenly aware of this issue early on and, in fact, were the first to raise it with commissioners' staffs. After installing a converter box to a TV set, viewers must scan for channels to make sure that they receive all of the digital stations broadcasting in their area. Some boxes do this automatically; some have to be scanned manually. Because some digital stations will be moving to different channels after the transition, re-scanning will be necessary. But re-scanning *cannot* be conducted prior to February 17, 2009. Therefore, getting out the message on re-scanning must occur very close to the analog deadline so as not to confuse viewers.

CBS Television Stations are planning a wide-scale on-air promotional campaign in January and February devoted to this all-important aspect of the transition. In the meantime, our stations are including a heads up about the need to re-scan in their half-hour specials and news stories. And we are actively raising the issue off-air --at community meetings, for example. Broadcasters, particularly those moving to a new DTV channel after the transition, are economically motivated to get this message out so that their signals can be received after February. In a market such as Baltimore, for example, our WJZ-TV is coordinating an effort with other market broadcasters changing digital channels. Our station there is planning both unilateral and cooperative phone banks beginning a week prior to the switch and is already taking calls to help viewers. Commissioner Copps' visit to that market earlier this month was extremely helpful in bringing all market stations together to discuss this aspect of the transition.

And in Dallas, our stations KTVT and KTXA are coordinating the channel change with four other market stations also changing channels to occur at exactly the same time so as to minimize the impact on viewers. Our stations in that market are taking a leadership role in conducting readiness tests, which were launched as early as last July.

Antenna Issues: In educating about the digital transition, CBS Television Stations have relied significantly on non-Internet means to assist our viewers in accessing our DTV signals –whether via converter box or via converter box plus antenna. We are economically motivated to do so.

In Dallas, our KTVT and KTXA stations have already developed a program to take phone calls and to help troubleshoot problems. Station engineering staff discuss with callers a number of possible solutions to problems posed, including (1) whether the viewer is using the proper antenna; (2) whether they may potentially need a higher performance outdoor antenna; (3) how to properly install the antenna; (4) how to properly position and orient the antenna toward the transmitters; and (6) where to obtain professional assistance in obtaining a new antenna.

A critical component of this messaging are the “readiness,” or “soft turn-off,” tests conducted in our markets. (See above, for more on readiness tests.) In New York, WCBS-TV learned a great deal from callers attempting to find areas of digital reception concern in Brooklyn and Queens as a result of the October 28 readiness test. Forums have already been held on this issue and grassroots marketing will target problem zones within the market.

In Detroit, WWJ and WKBD participated in a statewide DTV training program in cooperation with the Michigan National Guard. Dubbed “Operation Digital Preparedness Training,” our engineers and those from other stations around the state were on hand at National Guard learning centers to answer questions and give live demonstrations for installing and using a converter box and antenna.

In Boston, our WBZ-TV and WSBK, encouraged by Chairman Markey and using his state-wide connections, are participating with other Massachusetts broadcasters in innovative outreach efforts: on-air, door-to-door, and neighbor-to-neighbor. In addition, our stations and other broadcasters hope to partner with the Massachusetts Municipal Association, which is the state organization of cities, towns and hamlets.

Our Miami stations WFOR and WBFS have been active in newscasts with stories on the transition, including the antenna issues that viewers in South Florida will confront. These stories will increase in frequency leading up to the February switch. And in Norfolk, our WGNT staff has made antenna issues a prominent aspect of the DTV specials. They will also be adding staff before and after the transition to assist viewers where the digital signal may become a problem for viewers.

Signal Contour Issues: CBS engineers have undertaken several studies over the last few years to compare analog and digital coverage areas – both pre-transition and post-transition. To accurately and fully respond to concerns raised in your letter, we conducted a brand new engineering study just last week. Based on the current licensed facilities or granted and pending applications, 28 of the 29 full-power CBS Television Stations, as evaluated pursuant to the Longley-Rice model, are calculated to have digital coverage areas that will replicate their current analog areas. Because the engineering model is predictive, it is difficult at this time to determine what the actual, real-world comparisons will yield. In certain markets, for example, there are mountainous areas or pockets of extremely tall buildings we believe may interfere with reception of our signal, and we are committed to conducting field measurements after the transition to determine where actual losses are occurring. We are pleased that almost all of the stations

replicating their analog service areas actually will serve far more people in the digital world than they are in the analog world. For example, WPSG in Philadelphia, when its facility is maximized, will serve some 132% of the population now served by its analog contour. That means 2.1 *million* viewers who could not receive our analog signal will be able to watch our digital station in Philadelphia free, over the air. In the Sacramento-Stockton market, KMAX, once its facility is maximized, will serve 165% of the population it now serves in analog --or an additional 2.2 *million* viewers.

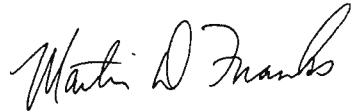
The CBS Television Stations digital facilities perhaps not fully replicating their analog coverage areas will be KCBS, Los Angeles and WPCW, Jeanette, PA.

In Los Angeles, KCBS, as a digital maximized facility, may cover only 92.4% of the population it serves in analog. The shortfall is based on a basic law of physics; that is, that VHF channels have better transmission capability than do UHF channels. KCBS's analog signal on channel 2 is able to bend around mountains and buildings better-- and, as a result, reach more viewers-- than KCBS's digital channel 43, which is limited to line of sight and is more vulnerable to interference from other stations. It should be noted that the viewers we anticipate we will not reach with our digital channel 43 will still be able to access a CBS signal free, over the air from adjoining markets. Thus, these viewers -- living far on the outskirts of the Los Angeles DMA-- will not be without CBS news, sports and entertainment programming. However, because all of our existing analog viewers are very important to us, once the transition is over, our engineers will study real-world population service and assess plans for providing our KCBS digital signal to the loss areas with a distributed transmission system or translators. Until we are able to restore service to these viewers, we are committed to informing them via on-air announcements, PSAs, news stories and/or our half-hour DTV specials that they may not be able to access KCBS on what we hope will be a short temporary basis starting in February.

In Jeannette, PA (Pittsburgh DMA), WPCW, as a digital maximized facility, should cover 92% of the people it serves in analog. However, it is important to note that the FCC's approval of our request to move the WPCW transmitter in order to collocate with that of our KDKA in Pittsburgh will result in a net population *gain* of 202%. This means that while some people now able to view WPCW will be unable to access our digital signal over the air, more than *double* the current analog population --for a total of more than 3.5 million persons-- will for the first time be able to watch the station, a CW affiliate, over the air. Because all of our existing analog viewers are critical to us, we want to ensure that those losing our signal in the digital world know that that will happen starting in February. We commit to informing these viewers via on-air announcements, PSAs, news stories, and/or our half-hour DTV specials that they may not be able to access WPCW in February, when we switch over to all-digital.

I hope the above is helpful. Please do not hesitate to contact me for additional information if more is needed. We at CBS sincerely appreciate your leadership in making digital broadcast television a reality.

Sincerely,

A handwritten signature in black ink that reads "Martin D. Franks". The signature is written in a cursive style with a large, looped initial "M".

Martin D. Franks

cc: The Honorable Joe Barton, Ranking Member
Committee on Energy and Commerce

The Honorable Cliff Stearns,
Subcommittee on Telecommunications and the Internet

Appendix A

CBS Television Stations group (owned and operated stations)

- WCBS-TV (CBS), New York, NY
analog channel 2; DTV channel pre-transition 56; DTV channel post-transition 33
- KCAL-TV (IND), Los Angeles, CA
analog channel 9; DTV channel pre-transition 43; DTV channel post-transition 9
- KCBS-TV (CBS), Los Angeles, CA
analog channel 2; DTV channel pre-transition 60; DTV channel post-transition 43
- WBBM-TV (CBS), Chicago, IL
analog channel 2; DTV channel pre-transition 3; DTV channel post-transition 12
- KYW-TV (CBS), Philadelphia, PA
analog channel 3; DTV channel pre-transition 26; DTV channel post-transition 26
- WPSG-TV (CW), Philadelphia, PA
analog channel 57; DTV channel pre-transition 32; DTV channel post-transition 32
- KPIX-TV (CBS), San Francisco-Oakland-San Jose, CA
analog channel 5; DTV channel pre-transition 29; DTV channel post-transition 29
- KBCW-TV (CW), San Francisco-Oakland-San Jose, CA
analog channel 44; DTV channel pre-transition 45; DTV channel post-transition 45
- KTVT-TV (CBS), Dallas-Fort Worth, TX
analog channel 11; DTV channel pre-transition 19; DTV channel post-transition 11
- KTXA-TV (IND), Dallas-Fort Worth, TX
analog channel 21; DTV channel pre-transition 18; DTV channel post-transition 19
- WBZ-TV (CBS), Boston, MA
analog channel 4; DTV channel pre-transition 30; DTV channel post-transition 30
- WSBK-TV (IND), Boston, MA
analog channel 38; DTV channel pre-transition 39; DTV channel post-transition 39
- WUPA-TV (CW), Atlanta, GA
analog channel 69; DTV channel pre-transition 43; DTV channel post-transition 43
- WKBD-TV (CW), Detroit, MI

analog channel 50; DTV channel pre-transition 14; DTV channel post-transition 14

- WWJ-TV (CBS), Detroit, MI
analog channel 62; DTV channel pre-transition 44; DTV channel post-transition 44
- WTOG-TV (CW), Tampa-St. Petersburg-Sarasota, FL
analog channel 44; DTV channel pre-transition 59; DTV channel post-transition 44
- KSTW-TV (CW), Seattle-Tacoma, WA
analog channel 11; DTV channel pre-transition 36; DTV channel post-transition 11
- WCCO-TV (CBS), Minneapolis-St. Paul, MN
analog channel 4; DTV channel pre-transition 32; DTV channel post-transition 32

Satellites: KCCO-TV (CBS), Alexandria, MN analog channel 7; DTV channel pre-transition 24; DTV channel post-transition 7

KCCW-TV (CBS), Walker, MN analog channel 12; DTV channel pre-transition 20; DTV channel post-transition 12

- WFOR-TV (CBS), Miami-Ft. Lauderdale, FL
analog channel 4; DTV channel pre-transition 22; DTV channel post-transition 22
- WBFS-TV (My Network TV), Miami-Ft. Lauderdale, FL
analog channel 33; DTV channel pre-transition 32; DTV channel post-transition 32
- KCNC-TV (CBS), Denver, CO
analog channel 4; DTV channel pre-transition 35; DTV channel post-transition 35
- KOVR-TV (CBS), Sacramento-Stockton-Modesto, CA
analog channel 13; DTV channel pre-transition 25; DTV channel post-transition 25
- KMAX-TV (CW), Sacramento-Stockton-Modesto, CA
analog channel 31; DTV channel pre-transition 21; DTV channel post-transition 21
- KDKA-TV (CBS), Pittsburgh, PA
analog channel 2; DTV channel pre-transition 25; DTV channel post-transition 25
- WPCW-TV (CW), Pittsburgh, PA
analog channel 19; DTV channel post-transition 11
- WJZ-TV (CBS), Baltimore, MD
analog channel 13; DTV channel pre-transition 38; DTV channel post-transition 13
- WGNT-TV (CW), Norfolk-Portsmouth-Newport News, VA
analog channel 27; DTV channel pre-transition 50; DTV channel post-transition 50