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September 15, 2008

**Dr. Phyllis Schiffer-Simon**  
Director

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**VIA CERTIFIED MAIL WITH RETURN RECEIPT**

COMCAST (and applicable subsidiaries)  
One COMCAST Center  
Philadelphia, PA 19103  
Attn: Must Carry

Re: WBEC-TV, Boca Raton, Florida  
NCE Must Carry Request for 2009 – 2011 Cycle

Dear Sirs:

The School Board of Broward County, Florida, licensee of noncommercial educational television station WBEC-TV (formerly WPPB-TV), at Boca Raton, Florida, hereby submits its request for mandatory cable carriage on applicable community units operated by your company during the 2009 to 2011 carriage cycle.

WBEC-TV, licensed at Boca Raton, in Palm Beach County, Florida, operates in analog on Channel 63 at 5000 kW from a tower located at SW 28<sup>th</sup> Street in Pembroke Park, Florida, and places a Grade B contour over Broward County and the bulk of Dade and Palm Beach Counties. WBEC-TV presently simulcasts on its digital facilities on Channel 40 from that same location. WBEC-TV expects to transition to digital-only service on February 17, 2009, the date specified by Congress and the FCC for the industry transition.<sup>1</sup>

In accordance with 47 CFR §§ 76.55(a) & (b) and 76.56 (a), WBEC-TV respectfully requests mandatory cable carriage on your company's community units that serve communities within Broward, Dade or Palm Beach Counties, and whose headends lie within 50 miles of the reference point of Boca Raton, Florida, or within WBEC-TV's Grade B Contour (a copy of its coverage map is attached). For your convenience, WBEC-TV has attempted to assemble a list of such community units from the FCC's list of registered and active systems (see attached community unit list). Should any applicable community unit have been omitted, or should such a community unit later be activated, WBEC-TV respectfully requests carriage on such community unit as well.

WBEC-TV as a qualified local NCE station does not believe, based on FCC and Statutory definitions, that its signal would be considered a distant signal for copyright

<sup>1</sup> If the community unit would prefer to commence carriage of WBEC-TV's digital signal commencing on January 1, 2009, rather than initiating cycle carriage of the analog signal on that date and then switching to digital carriage a month and a half later on the transition date, WBEC-TV would not object.

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purposes on any of your affected systems in Dade, Broward or Palm Beach counties. To the extent that you believe otherwise for any affected community unit, WBEC-TV requests that you identify the unit and the basis for such determination and provide an estimate of any expected additional annual copyright contribution obligations related to such carriage, so that WBEC-TV may assess any reimbursement obligations it would have in that regard. Additionally, WBEC-TV, as an unaffiliated qualified local noncommercial educational (NCE) television station, does not substantially duplicate the programming of any other area station. WBEC-TV believes that its strong signal will provide a good quality signal at these community unit headends, but is fully prepared to arrange for delivery of the signal to those locations if circumstances so require.

On many area systems WBEC-TV is already carried on channel 16, 19 or 24. On community units where WBEC-TV is not on one of those channels or is being carried for the first time, WBEC-TV respectfully requests that to the extent possible that it be placed on one of those preferred channels. Where such placement is not possible, WBEC-TV is most interested in carriage on each community unit on a channel that is contiguous to the other local broadcast stations and stands prepared to work with you to find a mutually acceptable channel. Additionally, as your company migrates to digital carriage and either remaps or revises the service tiers, WBEC-TV requests that efforts be made to facilitate such contiguous placement.

Please direct any inquiries regarding these matters to Chris Barch, Station Manager, WBEC-TV, 6600 SW Nova Drive, Ft. Lauderdale, Florida 33317, or to our Washington communications counsel Evan D. Carb, Esq. at (202) 293-2555.

Sincerely,



Chris Barch  
Station Manager

Enclosures

cc: Joe Golderer (via Email)

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**COMCAST** Applicable Community Units  
Listed as Active on FCC Registration List

**BROWARD COUNTY**

FL0008	PLANTATION	BROWARD
FL0153	TAMARAC	BROWARD
FL0185	LAUDERHILL	BROWARD
FL0207	SUNRISE	BROWARD
FL0228	LAUDERDALE LAKES	BROWARD
FL0279	DANIA BEACH	BROWARD
FL0280	WILTON MANORS	BROWARD
FL0281	DEERFIELD BEACH	BROWARD
FL0297	LIGHTHOUSE POINT	BROWARD
FL0302	POMPANO BEACH	BROWARD
FL0303	DAVIE	BROWARD
FL0337	BROWARD	BROWARD
FL0353	NORTH LAUDERDALE	BROWARD
FL0368	MARGATE	BROWARD
FL0414	FORT LAUDERDALE	BROWARD
FL0418	MIRAMAR	BROWARD
FL0419	PEMBROKE PINES	BROWARD
FL0449	OAKLAND PARK	BROWARD
FL0454	LAUDERDALE BY THE SEA	BROWARD
FL0456	PARKLAND	BROWARD
FL0457	BROWARD	BROWARD
FL0463	SEA RANCH LAKES	BROWARD
FL0465	HALLANDALE	BROWARD
FL0470	BROWARD	BROWARD
FL0478	LAZY LAKES	BROWARD
FL0480	LAUDERDALE BY THE SEA	BROWARD
FL0489	COCONUT CREEK	BROWARD
FL0499	COOPER	BROWARD
FL0500	HOLLYWOOD	BROWARD
FL0503	OAKLAND PARK	BROWARD
FL0508	PEMBROKE PARK	BROWARD
FL0512	PALM AIRE	BROWARD
FL0589	FORT LAUDERDALE	BROWARD
FL0591	WESTON	BROWARD
FL0601	BROWARD (NW)	BROWARD
FL0604	HILLSBORO	BROWARD
FL0633	WYNMOOR VILLAGE	BROWARD
FL0634	CENTURY VILLAGE EAST	BROWARD
FL0729	PEMBROKE PINES	BROWARD
FL0730	CENTURA PARC	BROWARD
FL0990	HOLLYWOOD PALM	BROWARD

FL1107	HOLLYWOOD SEMINOLE	BROWARD
FL1136	PLANTATION	BROWARD
FL1143	MIRAMAR	BROWARD
FL1246	WESTON	BROWARD
FL1247	AVENTURA	DADE
FL1252	FORT LAUDERDALE	BROWARD
FL1253	BROWARD	BROWARD
FL1254	BROWARD	BROWARD
FL1255	SW RANCHES	BROWARD
FL1275	HOLLYWOOD	BROWARD
FL1278	DANIA BEACH	BROWARD
FL1280	FORT LAUDERDALE	BROWARD
FL1281	LAUDERDALE BY THE SEA	BROWARD

DADE/MIAMI-DADE COUNTY

FLO202	HIALEAH	DADE
FLO416	DADE	DADE
FLO421	KENDALL	DADE
FLO422	SWEETWATER	DADE
FLO427	MIAMI SPRINGS	DADE
FLO428	VIRGINIA GARDENS	DADE
FLO429	MEDLEY	DADE
FLO485	NORTH MIAMI	DADE
FLO486	EL PORTAL	DADE
FLO487	MIAMI SHORES	DADE
FLO530	OPA-LOCKA	DADE
FLO533	BISCAYNE PARK	DADE
FLO534	N MIAMI BEACH	DADE
FLO436	DADE	DADE
FLO553	WEST MIAMI	DADE
FLO653	MIAMI	DADE
FLO674	CORAL GABLES	DADE
FLO675	HIALEAH GARDENS	DADE
FL1198	PINECREST	DADE
FL1199	AVENTURA	DADE
FL1262	SWEETWATER	DADE
FL1263	CORAL GABLES	DADE
FL1273	CORAL GABLES	DADE

FLO237	HOMESTEAD	MIAMI-DADE
FLO375	DADE	MIAMI-DADE
FLO401	FLORIDA	MIAMI-DADE
FLO528	KEY BISCAYNE	MIAMI-DADE
FLO839	LIBERTY	MIAMI-DADE
FL1205	MIAMI-DADE	MIAMI-DADE

PALM BEACH COUNTY

FLO082	JUNO BEACH	PALM BEACH
FLO083	JUPITER INLET COLONY	PALM BEACH
FLO084	LAKE PARK	PALM BEACH
FLO086	NORTH PALM BEACH	PALM BEACH
FLO087	PALM BEACH GARDENS	PALM BEACH
FLO088	PALM BEACH SHORES	PALM BEACH
FLO089	TEQUESTA	PALM BEACH
FLO108	LAKE WORTH	PALM BEACH
FLO109	LANTANA	PALM BEACH
FLO110	RIVIERA BEACH	PALM BEACH
FLO112	WEST PALM BEACH	PALM BEACH
FLO128	PAHOKEE	PALM BEACH
FLO179	PALM BEACH	PALM BEACH
FLO184	BELLE GLADE	PALM BEACH
FLO205	HAVERHILL	PALM BEACH
FLO206	LAKE CLARKE SHORES	PALM BEACH
FLO210	BOYNTON BEACH	PALM BEACH
FLO212	PALM SPRINGS	PALM BEACH
FLO213	MANGONIA PARK	PALM BEACH
FLO214	JUPITER	PALM BEACH
FLO217	PALM BEACH	PALM BEACH
FLO218	MANALAPAN	PALM BEACH
FLO248	SOUTH PALM BEACH	PALM BEACH
FLO278	BOCA RATON	PALM BEACH
FLO284	BOCA RATON	PALM BEACH
FLO293	PALM BEACH	PALM BEACH
FLO320	SOUTH BAY	PALM BEACH
FLO329	DELRAY BEACH	PALM BEACH
FLO330	GULFSTREAM	PALM BEACH
FLO331	PALM BEACH	PALM BEACH
FLO342	PALM BEACH	PALM BEACH
FLO355	PALM BEACH (N)	PALM BEACH
FLO466	ROYAL PALM BEACH	PALM BEACH
FLO471	HYPOLUXO	PALM BEACH
FLO481	GREENACRES	PALM BEACH
FLO506	JUPITER	PALM BEACH
FLO507	RIVIERA BEACH	PALM BEACH
FLO522	GREENACRES	PALM BEACH
FLO541	GOLDEN LAKES I & II	PALM BEACH
FLO459	LAKESWOOD HOUSE	PALM BEACH
FLO578	PALM SPRINGS	PALM BEACH
FLO579	PALM BEACH (S)	PALM BEACH
FLO587	OCEAN RIDGE	PALM BEACH
FLO598	HIGHLAND BEACH	PALM BEACH
FLO600	PALM BEACH (NE)	PALM BEACH

FL0619	GLEN RIDGE	PALM BEACH
FL0623	PALM BEACH	PALM BEACH
FL0642	GOLF	PALM BEACH
FL0676	DELRAY DUNES	PALM BEACH
FL0680	PALM SPRINGS	PALM BEACH
FL0685	ATLANTIS	PALM BEACH
FL0733	PALMLAND-BOYNTON BCH	PALM BEACH
FL0749	DELRAY BEACH	PALM BEACH
FL0754	CLOUD LAKE	PALM BEACH
FL0773	BOCA TEECA ET AL	PALM BEACH
FL0795	PAHOKEE	PALM BEACH
FL0799	BOYNTON BEACH	PALM BEACH
FL0804	PALM BEACH	BEACH
FL0806	PINES OF DELRAY (N)	PALM BEACH
FL0838	FOREST GLEN	PALM BEACH
FL0854	BOYNTON BEACH	PALM BEACH
FL0927	BROKEN SOUND P U D	PALM BEACH
FL0950	SUMMIT PINES	PALM BEACH
FL0951	VICTORIA WOODS	PALM BEACH
FL0952	FOREST LAKES	PALM BEACH
FL0953	VILLAGE CLUB	PALM BEACH
FL0975	INDIAN SPRING	PALM BEACH
FL0989	WHISPER WALK	PALM BEACH
FL1008	CRYSTAL POINTE	PALM BEACH
FL1009	FRENCHMANS CREEK	PALM BEACH
FL1058	KINGS POINT	PALM BEACH
FL1073	BOYNTON BEACH	PALM BEACH
FL1103	CALOOSA	PALM BEACH
FL1244	VILLAGE OF WELLINGTON	PALM BEACH
FL1299	HAVERHILL	PALM BEACH
FL1309	PALM BEACH	PALM BEACH

**FIGURE 1: WBEC-TV, Boca Raton, FL, Channel 63 Coverage Contour**

