

TESTIMONY OF ROBERT S. PRATHER  
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BEFORE THE U.S. HOUSE SUBCOMMITTEE ON COMMUNICATIONS,  
TECHNOLOGY AND THE INTERNET

March 26, 2009

Chairman Boucher, Ranking Member Stearns and the other distinguished Members of the Subcommittee, I am Robert Prather, President and Chief Operating Officer of Gray Television, Inc. Thank you for inviting me to speak today on the experiences of the Gray stations in completing the digital transition.

Gray Television, Inc. is a television broadcast company with headquarters in Atlanta, Georgia. Our primary mission is to provide quality news, weather, sports, and entertainment services in the thirty small and mid-size markets served by our thirty-six full- and low-power television stations. We are proud that a Gray station provides the first or second ranked news program in each of the markets we serve. Our stations are affiliates of the “Big Four” networks. Seventeen are affiliated with CBS, ten with NBC, eight with ABC, and one with FOX. In addition, Gray stations collectively operate forty digital secondary multicast channels, including one ABC, five Fox, eight CW and sixteen MyNetworkTV affiliates, plus eight local news/weather channels and two independent channels.

As of February 17, twenty-eight Gray stations completed the DTV transition. Of these, six stations transitioned in the months leading up to February 2009, thirteen transitioned on February 16, and nine transitioned on February 17. (See Appendix A)

Eight Gray stations continue to broadcast in analog. Of these stations, one will complete its DTV transition on April 16, and the remaining seven plan to continue analog broadcasts until they complete their transition on June 12.

Gray stations' digital transitions provide useful case-studies of how preparation, community outreach, and a willingness to go the extra mile can prepare viewers for DTV. Gray has been planning for the digital transition for over a decade. In the process, it has invested more than sixty million dollars to purchase and install new transmission equipment and high definition studio equipment. Additionally, Gray has invested heavily in the production and broadcast of consumer educational material about the digital transition.

Gray's approach to consumer education is encapsulated in a statement by the General Manager of WCAV(TV), Gray's Charlottesville, Virginia station: "We saw the education process as an opportunity, not a burden." In response to the FCC's consumer education initiative, Gray launched a company-wide coordinated consumer education effort in March 2008. Our stations exceeded the Commission's call for education by consistently airing more Public Service Announcements, informational crawls, and 30-minute informational segments than the agency's rules require. Our stations also extended consumer education efforts into their newsrooms by regularly including DTV transition information in local newscasts. In addition, many of our stations participated in market-wide voluntary "soft-tests" that showed viewers what would happen if they were not prepared for the DTV transition.

Early this year, it was clear that a small percentage of television viewers would not be ready for the nation's DTV transition on February 17. At the same time, industry

observers recognized that television broadcasters had spent several years planning for a February 17 digital transition. For broadcasters, a delay would mean forfeited deposits for tower crews and months of extra utility bills to keep analog transmitters on the air. Congress wisely balanced the competing needs of unprepared viewers and broadcasters in the DTV Delay Act. The legislation permits - but does not require - stations to continue providing analog service until June 12, 2009. And Congress specifically stated that "[n]othing in this Act" would preclude a television station from terminating analog service in accordance with the FCC's regulations then in effect.

Gray believed its stations and the markets they served were ready for the transition on February 17. Furthermore, Gray believed that viewers would face the same types of difficulties regardless of whether the transition occurred in February or June. Nevertheless, once Congress decided to delay the DTV transition date, I tasked each station's General Manager with assessing whether to proceed with the transition as scheduled or to delay it. General Managers were instructed to consider a number of factors, including market-readiness, individual viewer feedback, schedules for tower and equipment work, whether the station was moving to a different post-transition digital channel, and the transmitter utility costs – which for some stations exceeded \$10,000 a month and was an expense for which these station had not budgeted.

Twenty-two Gray stations moved forward with their transition plans, while eight stations decided to delay their transition. In fact, one of the eight stations - WHSV, Harrisonburg, Virginia, initially moved forward with its transition on February 16, but reassessed its decision four days later, and requested authority from the Commission to resume analog broadcasts. WHSV's location in the Shenandoah Valley left it susceptible

to loss of service in discrete communities because the station's digital signal was blocked by mountainous terrain. Although the majority of the market was ready for the transition, WHSV's General Manager made the decision to resume analog broadcasts in order to use the additional time to seek an alternative method to serve these communities.

Specifically, WHSV is working to acquire and convert TV translator stations to carry WHSV's digital signal into those areas which may experience a loss of service.

The twenty-two Gray stations that moved forward with the transition immediately increased their consumer education campaigns based on the FCC's requirements. The stations then individually expanded their efforts based upon the particular needs of their communities. For example, in Lansing, Michigan, WILX conducted "Turn off Tuesday" soft tests. During the *twelve weeks* leading up to the February transition, WILX performed a soft-test four times a day each Tuesday. During the soft tests, the station aired separate messages on its analog and digital channels indicating that viewers who saw a green background were ready for DTV but those who saw a red background were not. The "red screen" notices also included information explaining the steps a viewer needed to take to be ready for the transition. At KOLN in Lincoln, Nebraska, the General Manager participated in a local radio talk show about the DTV transition. Moreover, numerous stations participated in or hosted walk-in centers, where viewers could obtain in-person assistance on a variety of DTV issues, such as how to install a converter box or how to re-scan a converter box or digital television.

The number and complexity of the viewer phone calls received on, and immediately after, each station's transition date varied significantly by market. Yet, in all markets, certain trends were clear. As expected, the volume of calls peaked on a station's

transition day and declined steadily every day thereafter. The majority of issues could be resolved by providing instructions over the phone, and station employees went to extraordinary lengths to aid that handful of viewers who could not be helped by over-the-phone instructions. In many markets, station employees even made house calls to assist viewers solve more complex problems.

Gray's KOLO-TV in Reno, Nevada was the first station in its market to end analog broadcasts. KOLO understood it would bear the brunt of answering viewers' questions. Realizing that many viewers would need personalized assistance, KOLO took the approach that the DTV transition would need to happen "One Viewer at a Time" in Reno. To be able to provide this level of assistance, KOLO management prepared a DTV transition flow chart so that *every* KOLO employee could walk a viewer through the major transition issues. KOLO has shared its experience, lessons learned, and other transition tips with the other stations in its market to ensure the June transition goes just as smoothly.

Over and over again, Gray's stations found that the calls fell into the same basic categories: improper installation of converter boxes, the need to rescan DTV sets or converter boxes in order to receive stations on their "new" digital channel, and antenna issues associated with stations that were moving from VHF to UHF channels, or vice versa. In Gray's experience, questions on how to obtain a coupon or about the status of the coupon wait-list represented only a fraction of the calls, and even fewer were from individuals who were not aware of the digital transition.

The FCC also deployed significant resources to assist stations making the transition in February. In many markets, Commission staff was on hand to assist stations

in fielding consumer questions and staffing walk-in and call-in centers. Gray stations uniformly received high marks from the agency's staff for their preparation and handling of the transition. At WIFR in Rockford, Illinois, the FCC staff was particularly impressed with the transition coverage of practical issues – such as converter box installation - provided during local newscasts. Indeed, the staff told the station's General Manager that they had “learned a lot and they would take that knowledge with them.”

For Gray, the DTV transition has been a positive experience. The majority of Gray's viewers were ready for DTV, but for viewers who were not fully ready, the majority of their specific concerns could not have been identified or resolved until a core group of stations completed their transitions. Through the lessons learned by the stations that completed their DTV transition in February, the FCC has been able to carefully target additional DTV consumer education requirements going forward. Gray is confident that the information gathered during its stations' February transitions will make the final DTV transition in June even smoother for other broadcasters and their viewers.

Mr. Chairman, I appreciate this opportunity to appear before the Subcommittee and look forward to any questions that you may have for me.

## Appendix A

Gray Television, Inc.

### *DTV Transition Schedule*

These stations terminated analog service before February 16.

KBTX, Bryan, Texas  
KXII, Sherman, Texas  
WSWG, Valdosta, Georgia  
KLBY, Colby, Kansas  
WBKO, Bowling Green, Kentucky  
KOLO, Reno, Nevada

The following stations terminated analog operations on February 16.

WSAZ, Huntington, West Virginia (WSAZ is providing 60 days of enhanced analog nightlight service)  
WCAV, Charlottesville, Virginia  
WAHU-CA, Charlottesville, Virginia  
WVAW-LP, Charlottesville, Virginia  
WEAU, Eau Claire, Wisconsin  
KOLN, Lincoln, Nebraska  
WMTV, Madison, Wisconsin  
WTAP, Parkersburg, West Virginia (WTAP provided two weeks of analog nightlight service)  
WIFR, Freeport, Illinois  
WNDU, South Bend, Indiana (WNDU provided two weeks of analog nightlight service)  
WIBW, Topeka, Kansas  
WSAW, Wausau, Wisconsin  
KUPK, Garden City, Kansas

\*WHSV terminated analog operations on February 16, but resumed analog operations on February 20.

The following stations terminated analog operations on February 17.

KWTX, Waco, Texas  
KAKE, Wichita, Kansas  
KGIN, Grand Island, Nebraska  
WILX, Onandaga (Lansing), Michigan  
WCTV, Thomasville, Georgia  
WOWT, Omaha, Nebraska  
WYMT, Hazard, Kentucky

WRDW, Augusta, Georgia  
KKCO, Grand Junction, Colorado

The following stations continue to broadcast in analog, all will operate until June 12, except as noted.

WTOK, Meridian, Mississippi  
WVLT, Knoxville, Tennessee  
WTVY, Dothan, Alabama  
KKTU, Colorado Springs, Colorado  
WKYT, Lexington, Kentucky \* will terminate analog operations on April 16, 2009.  
WITN, Washington, North Carolina  
WJHG, Panama City, Florida  
WHSV, Harrisonburg, Virginia