July 2, 2015

Honorable Tom Wheeler, Chairman  
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Hon. Michael O’Rielly, Commissioner  
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Re: MB Docket No. 14-90  
In the Matter of Applications of AT&T, Inc. and DirecTV  
for Consent to Assignment or Transfer of Control of Licenses

Dear Chairman Wheeler and Commissioners:

A letter sent to you on June 29, 2015, by ZGS Communications, Inc. in connection with the above-captioned matter has been brought to my attention. ZGS noted the difficulty that its Hispanic Class A television stations have had in obtaining satellite carriage by DirecTV. ZGS is not the only Hispanic-oriented broadcaster that has had this problem. My company has had the same experience with DirecTV – an experience that stands in contrast to the behavior of all the other MVPDs in our market, including DISH Network.

I support the ZGS letter. My company, Korean American TV Broadcasting Corp. is the licensee of Class A digital television station WKTB-CD, Norcross, Georgia. We are the Telemundo network affiliate for the Atlanta DMA. Like ZGS, we have the utmost respect for our FCC license, and we view our responsibility as a local broadcaster as an opportunity and honor to serve the community. We work very hard to provide local service to our Hispanic audience. According to Nielsen ratings, we are among
the top two Spanish language broadcasters in the DMA. Our station, despite not having legal must-carry rights, is carried by every major MVPD in the market, including both cable and DISH Network, in both standard and high definition formats, and on the basic tier. We have earned this distribution based on the merits of our service. ONLY DirecTV refuses to carry our signal. Instead they carry a national Telemundo network feed in SD, undermining our attempt to enjoy the benefit of our network affiliation and depriving their customers of the local component of our service, despite the fact that Hispanics make up 10% of the population of our DMA.

Our station is minority and woman owned and managed. Failure to carry a top Spanish language station in the DMA puts the station at a disadvantage and Hispanic viewers at a disadvantage. There are only two Spanish language stations that produce local news in the Atlanta DMA. While DirecTV carries two local Spanish language stations, a full power and a low power station, only the full power station actually broadcasts a local newscast leaving subscribers with no choice when it comes to viewing local news and information in Spanish. Our station provides more local news in Spanish than any other station in the State of Georgia, including both general market and Spanish language stations. For eight months in 2014-2015, our 11:00 p.m. newscast was viewed in more than 50% of Spanish language households in the Atlanta DMA. A week ago, we launched a one-hour local newscast at 5:30 p.m. Our station has received over 13 Emmy® Awards since 2012, including Best Newscast in 2014 and Station Excellence Emmy® Awards consecutively in 2013-2014. We work passionately day in and day out to provide a lifeline of Hispanic-centric local news for the Hispanic community -- vital news that provides awareness and advancement while living their daily lives in Georgia, including weather reports, public safety, state and local legislation and much more. By not opting to carry Telemundo Atlanta, DirecTV has blocked its subscribers from having a choice and has left them with no option but to view a single source of local news in Spanish.

Why does only DirecTV ignore us? Respectfully, their attention to local audience needs is difficult to discern when all we want to do is extend local programming using one of the most viable methods of disseminating relevant news and information to a community that deserves more than one choice for local news in Spanish. We hope that the FCC will encourage AT&T to do better if AT&T’s acquisition of DirecTV is approved. This letter is not intended to harm or impede the merger between AT&T and DirecTV, rather open doors for conversation on how the Hispanic community in Atlanta can be further served.

Respectfully submitted,

Susan Sim Oh, President

cc: Michael D. Nilsson, Esq., Counsel for DirecTV
    Peter J. Schildkraut, Esq., Counsel for AT&T