



*Lokita
Solutions*

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of

Authorizing Permissive Use of the “Next)

Generation” Broadcast Television)

Standard)

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GN Docket No. 16-142

FEDERAL COMMUNICATIONS COMMISSION

COMMENTS OF RTP HOLDINGS / LOKITA SOLUTIONS

EXECUTIVE SUMMARY

Lokita Solutions is a small software startup that is leveraging the benefits of the “Next Generation” broadcast television (Next Gen TV) transmission standard, known as ATSC 3.0. Our company is developing and deploying applications that rely on the new broadcast standard. Our mission is to create software that helps broadcasters position-enable mobile apps, for localized content engagement.

Indoor delivery of mobile video is one of the new standard’s biggest strengths. Today mobile consumption of video is growing exponentially, over 20% of U.S. households use an antennae for reception on at least one TV, and over 66% of homes have at least one television connected to the Internet.¹ These numbers have been growing in double digits due to the trend of cable cord cutting. Younger viewers often go to their mobile devices first for video content, and only occasionally gravitate toward a bigger TV display. ATSC 3.0 is Internet-based and mobile-first making it a transformational technology for the broadcast industry. It will deliver robust signals to TVs deep inside large buildings, without the need for exterior antennas, as well as to fast moving vehicles, and to handheld mobile devices on-the-go in urban and rural areas.

To compete in today's 100% mobile world, broadcasters have no choice but to embrace this next-gen mobile TV business. Industry thought leaders expect that ultimately every mobile device will have the capability to receive the Next Gen TV signal. Lokita Solutions has partnered with the Korean company, DigiCAP Inc., to begin deploying these services in South Korea and in the U.S. We have joined The AWARN Alliance (Advanced Warning and Response Network) to develop Advanced Emergency Alerts as one of the major public benefits of Next Gen TV. AWARN will distribute geo-targeted, personalized rich media alerts

¹ <http://blog.tivo.com/2017/03/tivo-q4-2016-online-video-trends-report/>

to fixed, mobile, and hand-held devices, indoors or outdoors, across much wider broadcast coverage areas than we have today with the current generation TV Emergency Alert System (EAS), and with Wireless Emergency Alerts (WAE). Additionally, AWARN alerts over next-generation broadcast will be much more reliable and resilient than the alerting done over other wireless networks.²

Next Gen TV matters because broadcasters will be able to send more higher-quality programming, and will be able to provide advanced emergency alerts tailored to a viewer's particular location. Most significantly, consumers will easily be able to watch over-the-air programming on mobile devices. Lokita Solutions strongly supports and encourages the Commission's rapid adoption of the proposed rules to allow television broadcasters to begin transmission of the new standard.

INNOVATION IS THE KEY

The United States has a unique opportunity to lead the world in Next Gen TV services. While ATSC is a global standards body based in Washington DC, the U.S. has the advantage of quickly adopting the new standard just as South Korea is beginning to deploy it. As an industry we celebrated the first commercial launch of Next Gen TV services in Seoul this spring. At this year's CES and NAB shows we demonstrated end-to-end ATSC 3.0 broadcasting platforms that are now proven for deployment at North American broadcasting stations. This year field trials in the U.S. are expected to become beta markets for testing new services and business models.

ATSC 3.0 is a technology with capabilities that will fuel competition in the television marketplace. It will accelerate the competition that continues to heat up from broadband video providers like Netflix and Hulu. Moreover, one-to-many broadband Internet over-the-air will revolutionize the wireless broadband marketplace for the age of the Internet-of-Things (IoT).

² <http://awarn.org/>

Advanced Emergency Alerts is just one of many innovations that can benefit the public. Greater accessibility for audiences with disabilities is another great example of innovation ready to happen with ATSC 3.0, because Next Gen TV can be personalized for the viewer.

RAPID DEPLOYMENT EQUALS ECONOMIC IMPACT

The Commission should find ways to streamline the ability for stations to begin field trials as soon as possible. Over 1,000 television stations are impacted by the spectrum repack. Upgrading to ATSC 3.0 before and/or during the repack makes much more sense economically than would sending technicians to go back to the stations for a second Next Gen TV upgrade activity after their repack migrations. Stations considering the timing of the upgrade need adequate time to test the new services to best prepare for a seamless repack transition. ATSC 3.0 allows for much easier channel sharing, and virtual channel bonding, so stations will be able to simulcast more efficiently and keep current services on and unimpeded. Since hundreds of stations are beginning the repack next year, they should be given ample runway to do their Next Gen TV upgrades, and test their systems, well before their repack migrations begin in 2018.

Aside from the economic impacts to TV stations, rapid deployment will help close the digital divide, providing economic benefits to “the rest of us”. Single Frequency Networks (SFNs) will allow broadcasters to cover much greater and denser coverage areas. People in rural areas with limited choice of MVPD providers, and/or broadband Internet providers, will have broadcast signal options they didn’t have before. Those broadcast options may include virtual-MVPD services, AND Internet datacasting services.

START NOW – SAVE LIVES

If for no other reason than to save lives, the Commission and the broadcast industry as a whole should start now with Next Gen TV upgrades and deployments. Geo-targeting Advanced Emergency Alerts so that only alerts intended for a specific geographic area will be displayed on devices in that area will save more lives as soon as those services are activated. The National Weather Service estimates 1,200 tornadoes result in about 110 fatalities per year, and has said this year has seen one of the most active starts to tornado season in history. Overall weather related deaths in the U.S. have been at about 550 per

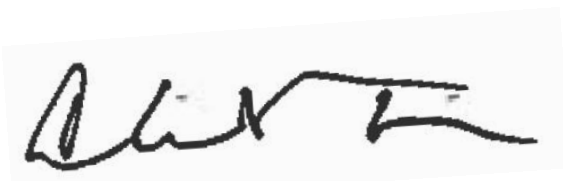
year.³ Mobile alerts and AWARN geo-targeting will help minimize the problem of over-alerting people who are not in harm's way, meaning people who get the alerts will take them seriously and will be more likely to seek shelter.

SUMMARY

We commend the Commission's actions on this matter, and ask the Commission to remember back to the 1990s when the original cable modems had superfast downloads, but not much upstream speed. Those devices revolutionized consumer broadband and the Internet. Next Gen TV is over-the-air broadband Internet. The innovation that the ATSC 3.0 standard is now releasing is truly amazing and phenomenal. It must be experienced first-hand to understand the power of its capabilities, which is why early field trials and rapid deployments starting this year are so critical. Most importantly, the broadcast industry is united in their commitment to using the airwaves for public safety. Getting Advanced Emergency Alerts right, and fine tuning their efficacy with geo-targeting will take experimentation. The entire Next Gen TV ecosystem needs the latitude to begin implementing and testing these new public safety capabilities.

Commissioner O'Rielly's goal of having the initial rules to authorize voluntary use of the "Next Generation" broadcast standard, with no unnecessary mandates, in place by October is the correct one. Rapid approval of this NPRM promises to again revolutionize broadband media as we know it.

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³ <http://www.nws.noaa.gov/om/hazstats.shtml>