

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Upgrade to the Next Generation) GN Docket No. 16-142
Digital Television Service)

COMMENTS OF TEGNA INC.

Based on the record compiled in the comments in this proceeding, TEGNA Inc. (“TEGNA”) urges the Commission to move forward expeditiously with a Notice of Proposed Rulemaking on adoption of Advanced Television Systems Committee (“ATSC”) 3.0, also called Next Generation TV, to permit broadcasters to elect to deploy this new standard on an optional basis. TEGNA owns and/or provides services for 46 television stations across 23 states and is the largest independent station group of major network affiliates in the top 25 markets. TEGNA stations reach approximately one-third of all television households nationwide. As multiple commenters noted, Next Generation TV is an innovative, new technology, and TEGNA is eager to begin deploying it for the benefit of these viewers.

The comments demonstrate decisively that the benefits of Next Generation TV are substantial and important: consumers will experience higher quality picture and sound, receive enhanced emergency alert information, and have the ability to receive reliable programming on mobile and handheld devices such as tablets and smartphones. TEGNA urges the Commission to move ahead toward a notice of proposed rulemaking by October 1, 2016 so that the American public can begin experiencing these technological improvements as soon as possible.

The Commission has no reason to delay. First, acting now will allow stations to use the opportunity of the spectrum auction repack to upgrade their transmitters so that they will be

ready to provide this new service to their communities. The Commission should not pass up this opportunity to benefit consumers while also saving money. Second, none of the issues raised by other commenters in this proceeding suggest a compelling reason for delay. Although some commenters expressed concern that the transition would force additional costs on MVPDs, this is simply not the case. The transition is voluntary, and therefore MVPDs will not be required to carry Next Generation TV signals during the transition period. Additionally, must-carry obligations will not require MVPDs to purchase new equipment, as the petition proposes that transitioning stations simulcast their signals in the current digital standard. Of course, if MVPDs would like to offer their customers the many features broadcasters will be able to provide using Next Generation TV, they may elect to do so. As they currently do, MVPDs may obtain rights from broadcasters through retransmission consent negotiation, a process that is not new to TEGNA or any MVPD.

TEGNA is committed to providing a high degree of service to its communities of license, and most assuredly will ensure that it does not disenfranchise its viewers. Therefore, while some commenters expressed concern about the eventual phase-out of the current digital standard, TEGNA stations will simulcast their signals in the current digital format for the foreseeable future so that all viewers will be able to view our stations' programming. As a certain number of TEGNA's viewers will be viewing these simulcast signals for many years to come, TEGNA intends to maintain the highest quality signal possible. One of the key elements of the Next Generation TV transition is that it will be largely market-driven and will not require the Commission to allocate any funds or spectrum. This substantial benefit to the Commission does mean that in some cases stations may have to choose the particular type of ATSC 1.0 transmission that will be appropriate (e.g., a station transmitting in 1080i may move to 720p).

But the signals TEGNA stations simulcast in ATSC 1.0 will fully comply with current Commission rules on signal quality. In addition, TEGNA is monitoring technological advances that may permit higher-quality simulcast signals during the transition phase. Since the FCC permitted broadcasters to channel share in the auction context and beyond, there have been meaningful developments in coding and content multiplexing that may ultimately provide stations with the ability to transmit multiple HD signals from a single facility. If so, TEGNA intends to be a leader in adopting these new technologies.

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Adopting the Next Generation TV standard and permitting stations to deploy it on a voluntary basis will provide consumers with substantial viewing and public safety benefits. Acting now will allow stations that are being repacked to minimize costs by installing Next Generation TV-capable equipment during the upgrades that they will need to perform regardless. None of the issues raised by commenters merit delay. TEGNA urges the FCC to promptly issue a Notice of Proposed Rulemaking on this issue to enable it to approve the new standard and make the ministerial rule changes and pronouncements required to implement the voluntary transition to Next Generation TV.

Respectfully submitted,

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