

June 27, 2016

VIA ECFS

Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325,
Washington, DC 20554

RE: GN Docket No. 16-142
Support for Voluntary Transition to Next Generation TV Standard

Dear Madam Secretary,

In these reply comments, television broadcasters Meredith Corporation, Hubbard Television, and Gray Television Group, Inc. (“Supporting Broadcasters”) enthusiastically **support** the Joint Petition for Rulemaking filed by America’s Public Television Stations (APTS), The AWARN Alliance, The Consumer Technology Association (CTA), and The National Association of Broadcasters (NAB) regarding the Commission’s role in broadcasters’ voluntary transition to the Next Generation TV transmission standard (the “Joint Petition”). The Supporting Broadcasters own television stations in small, medium, and large markets spread geographically across the United States. Indeed, the Supporting Broadcasters own television stations in spectrum-congested large markets, geographically disparate rural areas, and everything in between.

The Supporting Broadcasters commend the Commission for beginning the process toward the Next Generation Television Standard and urge the Commission to move forward without further delay. In that vein, the Supporting Broadcasters encourage the Commission to recognize certain initial comments in response to the Commission’s public notice as nothing more than transparent attempts to delay competition that broadcasters using the Next Generation Television Standard would bring to the video ecosystem. The Supporting Broadcasters address several such attempts in turn in these reply comments, but also support the reply comments of the National Association of Broadcasters in this proceeding.

The FCC Should Not Hamper Broadcasters with Additional Regulatory Obligations

Television stations are already the most regulated video programming provider in the ecosystem. Several groups (whether video competitors or representing broader interests) demand that the Commission increase regulatory burdens on broadcasters, despite the fact that broadcasters seek no additional spectrum or government assistance. Wireless carriers, white spaces providers, and satellite carriers do not have such burdens, and those entities are broadcasters’ competitors. The Commission should ignore these proposals as regulatory opportunism.

The FCC Should Not Mandate Quality Standards, Technology or Services, or DMA Coverage

Multi-channel Video Programming Distributors (“MVPDs”) in particular further attempt to inject out-of-scope proposals into this proceeding. The Commission should reject such attempts out of hand. For example, the Commission should not mandate quality standards, one or more types of service, or coverage of a Designated Market Area (“DMA”) in order for television broadcasters to take advantage of the Next Generation Television Standard.

It almost does not need to be said that broadcasters will do everything in their power to ensure that their product is delivered to their consumers (*i.e.*, viewers) in the best quality technically possible and

the services that consumers demand. Like channel-sharing permitted as a result of the incentive auction, broadcasters will use rapidly innovating technology to provide the best product possible in their situation as part of the transition to and implementation of Next Generation Television. Specifying mandated quality standards or services will only hamper broadcasters' efforts in a rapidly changing technological environment. If a broadcaster believes that 4K or HDR or some service that we do not even know of yet will best provide for a competitive product, then broadcasters should be able to implement that product with the Next Generation Television Standard.

As to a single MVPD's suggested requirement that broadcasters must cover an entire Designated Market Area with an over-the-air signal in order to benefit from the Next Generation Television Standard, broadcasters are (and have been for decades) licensed to a community of license (not a DMA) and limited in the spectrum available for license by the Commission. Broadcasters would love the ability to fully cover each and every DMA, but the laws of physics and requirements of the Commission's licensing regime render that impossible in many cases.

The FCC Should Not Require Additional ATSC 3.0 Carriage by MVPDs

Consistent with the Joint Petition, the Supporting Broadcasters agree with several MVPD commenters that the FCC need not impose new or additional obligations on multi-channel video programming distributors to specifically carry Next Generation signals during the voluntary transition period (separate from the must carry and retransmission consent obligations generally). In the proposed voluntary transition, interested parties will be able to resolve such carriage issues through negotiation.

Conclusion

In conclusion, the Commission should implement the requested relief in the Joint Petition with utmost speed. The Supporting Broadcasters specifically encourage the Commission to issue a Notice of Proposed Rulemaking on this matter by October 1, 2016. Other than the single clarification regarding MVPD requirements discussed immediately above, the Supporting Broadcasters do not believe that any other proposals beyond the Joint Petition merit inclusion in the rulemaking process. Time is of the essence in a world of speedy innovation and the upcoming television broadcasting repacking process.

Very truly yours,

/s/

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