

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

REPLY COMMENTS OF NEXSTAR BROADCASTING, INC.¹

Nexstar Broadcasting, Inc. (“Nexstar”), the licensee of 74 full-power television stations, urges the Commission to issue a Notice of Proposed Rulemaking (“NPRM”) as soon as possible in order to bring the innovation of Next-Generation Television to consumers under a flexible, market-based framework.

The Petition seeks minimum technical changes to the Commission’s rules so that the ATSC 3.0 standard may be quickly implemented as a platform for consumer-benefitting advances in broadcast television technology. Next-Generation Television does not require new spectrum, nor will it cause interference to existing technology. The proposed light-touch regulatory approach will not only provide broadcasters with room to differentiate Next-Generation Television offerings, but it is also consistent with the Commission’s policy goal of allowing industries the freedom to innovate and compete. The faster this technology can get into consumers’ hands, the better the already vibrantly competitive video distribution market will be. Accordingly, the Commission should promptly issue a NPRM to facilitate this innovation.

¹ Nexstar hereby submits reply comments in response to the Joint Petition for Rulemaking in the above-captioned proceeding. *See* Joint Petition for Rulemaking, April 13, 2016, GN Docket No. 16-142 (rel. Apr. 26, 2016) (“Petition”). Unless otherwise noted, all comments cited were filed in GN Docket No. 16-142.

Notwithstanding that the Petition does not ask the Commission to obligate MVPDs to carry Next-Generation signals during the transition period or to bear new expenses involuntarily – leaving Next-Generation carriage decisions to the voluntary, market-based decisions of the parties, some MVPDs and/or their trade associations seek to attach unrelated and unneeded requests to this proceeding.² Indeed, MVPD demands for these needless conditions on Next-Generation Television appear driven by a desire to restrict market-based competition. The FCC should reject transparent opportunism and refrain from shackling broadcasters with additional, unnecessary regulatory burdens.

Finally, the complexities of channel sharing and the post-auction repack will make broadcasters well equipped to helm the transition from ATSC 1.0 to 3.0. Make no mistake – without a defined simulcast period, the transition to Next-Generation Television will not be easy. That is why broadcasters need maximum flexibility to make it happen. The competitive video distribution market already incentivizes Nexstar and others to provide excellent news, emergency information, sports, and other top-rated content to consumers. The need for technological mandates and regulatory benchmarks is absent.

For the foregoing reasons, Nexstar respectfully asks the Commission to move swiftly and issue an NPRM in this proceeding that gives broadcasters the flexibility to innovate and provides consumers with the numerous benefits of Next-Generation Television.

² See, e.g., Comments of DISH Network LLC, at 5; Comments of American Cable Association, at 7-10.

Respectfully submitted,

Nexstar Broadcasting, Inc.

By: _____ /s/

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