

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)

REPLY COMMENTS OF RAYCOM MEDIA, INC.

Raycom Media, Inc. (“Raycom”) urges the Commission to promptly move forward with a Notice of Proposed Rulemaking on adoption of the additional broadcast transmission standard developed by the Advanced Television Systems Committee (“ATSC”), and to allow broadcasters the option to implement this new standard (“Next Generation TV” or “ATSC 3.0”) while they continue to deliver current-generation DTV broadcast service to their communities. As multiple commenters noted, Next Generation TV will enable broadcasters to bring viewing and public safety benefits to their communities. Raycom owns 51 full-power television stations in 19 states, and is deeply invested in providing the best service possible for these areas. Raycom sees Next Generation TV as a revolutionary tool to further this mission.

Clearly, the comments filed in this proceeding underscore Raycom’s long-held view that permitting this optional implementation of an innovative new technology will permit broadcasters such as Raycom to more intensively serve their communities of license. Raycom seeks to provide higher quality picture and sound, enhanced emergency alert information, and the ability to receive reliable programming on mobile and handheld devices such as tablets and smartphones to its customers. Given Next Generation TV’s benefits, and having been offered no reason to delay, Raycom urges the Commission to issue a Notice of Proposed Rulemaking by October 1, 2016. This timing will allow deployment to occur at the same time as the spectrum

auction, enabling stations that will be repacked to save money by install future-ready equipment that will support Next Generation TV.

None of the questions raised by other commenters in this proceeding merit delay. Multiple commenters stressed that the voluntary transition to Next Generation TV should not force additional costs on MVPDs. Must-carry obligations would not require MVPDs to purchase new equipment at this time, as stations that transition will simulcast their signal in the current digital standard. If MVPDs would like to offer their customers the improved picture and features Raycom stations can provide using the Next Generation TV standard, MVPDs may obtain those rights and resolve any costs that may arise through retransmission consent negotiation, the way all cost issues are resolved between Raycom stations and their carriers.

Raycom expects that many of its viewers will be early adopters of Next Generation TV-compatible devices, but of course we understand that many viewers will maintain legacy equipment for some time to come. Raycom is committed to simulcasting Next Generation TV and signals in the current digital format for the foreseeable future to ensure that no viewers are disenfranchised. While at some point in the future viewers will own Next Generation TV reception equipment or converters, and the legacy standard will no longer be essential, this will be years down the road. Because this lengthy period of simulcasting is necessary to serve all of our customers, Raycom intends to maintain the highest quality signal possible. The transition will be accomplished without additional spectrum. Signals simulcast in ATSC 1.0 will fully comply with current Commission rules on signal quality. The FCC has already permitted broadcasters to channel share in the auction context and beyond, and technology has advanced even since that grant of authority. Raycom is following the advances in coding and content

multiplexing that may improve the ability to transmit multiple HD signals from a single facility and will deploy them if they benefit consumers.

Finally, Raycom reiterates its point that the Commission can reduce the potential costs of Next Generation TV by acting swiftly enough to permit implementation of Next Generation TV-capable equipment during the post-auction repacking process. Many of the stations that will be repacked as a result of the spectrum auction will require some of the new equipment necessary for the conversion. It will cost little more for a broadcaster to build to the new standard than to the old standard. Allowing broadcasters to take advantage of these cost savings will increase the number of stations that can begin the transition to Next Generation TV and start bringing all of its benefits to their communities.

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Raycom 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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June 27, 2016