

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

Joint Petition for Rulemaking of )  
America’s Public Television Stations, )  
the AWARN Alliance, the Consumer )  
Technology Association, and the National ) GN Docket No. 16-142  
Association of Broadcasters Seeking to )  
Authorize Permissive Use of the “Next )  
Generation TV” Broadcast Television Standard )

**REPLY COMMENTS OF THE  
ABC TELEVISION AFFILIATES ASSOCIATION,  
CBS TELEVISION NETWORK AFFILIATES ASSOCIATION,  
FBC TELEVISION AFFILIATES ASSOCIATION, AND  
NBC TELEVISION AFFILIATES**

The ABC Television Affiliates Association, CBS Television Network Affiliates Association, FBC Television Affiliates Association, and NBC Television Affiliates (collectively, the “Affiliates Associations”)<sup>1</sup> submit these reply comments in support of the Joint Petition for Rulemaking (the “Joint Petition”) filed by America’s Public Television Stations, the AWARN Alliance, the Consumer Technology Association, and the National Association of Broadcasters (collectively, the “Joint Petitioners”). The Joint Petition asks the Commission to initiate a rulemaking proceeding to facilitate adoption of a key component of the “Next Generation TV” standard—the system discovery and signaling architecture for the ATSC 3.0 physical layer. In

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<sup>1</sup> Each of the ABC Television Affiliates Association, CBS Television Network Affiliates Association, FBC Television Affiliates Association, and NBC Television Affiliates is a non-profit trade association whose members consist of local television broadcast stations throughout the country that are each affiliated with its respective broadcast television network.

response to the Media Bureau’s April 26, 2016 Public Notice<sup>2</sup> soliciting comment on the Joint Petition, dozens of commenters have voiced support for swift action by the Commission to effectuate a wholly voluntary, market-driven approach to begin to explore the wealth of consumer benefits heralded by the Next Generation TV standard. The Affiliates Associations join those commenters in urging prompt Commission action on the Joint Petition—more specifically, the issuance of an appropriate *Notice of Proposed Rulemaking* no later than October 1, 2016, to facilitate the initial transition to ATSC 3.0 in coordination with the post-spectrum auction repacking.

## I

### **The ATSC 3.0 Standard Represents an Opportunity for the Commission to Promote Innovation that Benefits Consumers**

The adoption of the new ATSC 3.0 standard by the Advanced Television Systems Committee presents the Commission, consistent with Chairman Wheeler’s announced commitment to leadership in innovation, with an opportunity to facilitate significant technical and service enhancements to the free, over-the-air television broadcast service for the benefit of American television viewers.<sup>3</sup>

The Affiliates Associations support the Joint Petition and respectfully urge the Commission to facilitate the transition by instituting a rulemaking proceeding to effectuate a

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<sup>2</sup> *Media Bureau Seeks Comment on Joint Petition for Rulemaking of America’s Public Television Stations, the AWARN Alliance, the Consumer Technology Association, and the National Association of Broadcasters Seeking to Authorize Permissive Use of the “Next Generation TV” Broadcast Standard*, Public Notice, 31 FCC Rcd 3858 (April 2016).

<sup>3</sup> *See, e.g.*, Remarks of FCC Chairman Tom Wheeler, “The Future of Wireless: A Vision for U.S. Leadership in a 5G World,” National Press Club, Washington, DC (June 20, 2016), available at [http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2016/db0620/DOC-339920A1.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0620/DOC-339920A1.pdf).

voluntary, market-driven approach proposed in the Joint Petition. The benefits to American consumers of the deployment of the ATSC 3.0 transmission standard are, indeed, substantial. The opportunity for the development of new services, as well as the improvement and enrichment of current services, is exciting and ought to move the Commission to act without delay. The Joint Petition, and the numerous supporting comments filed in this proceeding,<sup>4</sup> outline the many benefits to consumers and viewers of the ATSC 3.0 standard, including:

1. Increased vibrancy of over-the-air signals, with improved reception on both home as well as mobile and handheld devices.
2. Dramatic improvements in picture and sound quality, including (a) high dynamic range (“HDR”) video that dramatically expands both contrast and color range, and (b) an immersive audio experience with consumer-friendly opportunities to personalize audio.
3. Opportunities for an unprecedented degree of viewer personalization and interactivity, including the ability to access secondary content, alternate versions of primary content, and user-generated content.
4. Support for customizable and even multiple views of the same program, on a single or multiple screens, including panoramic views and capacity for panning, zooming, and camera angle selection.
5. Geo-targeting of news, weather, public interest, sports, and other programming to better serve the viewing public.
6. Potentially life-saving advances in emergency alerting, including receiver “wake up” functionality, localization filtering of emergency alerts, and the capacity for more efficient communication among first responders, public safety officials, news media, and the viewing public.<sup>5</sup>

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<sup>4</sup> *See, e.g.*, Comments of Pearl Mobile DTV Company LLC, GN Docket No. 16-142 (May 26, 2016) at 2-6.

<sup>5</sup> *See* America’s Public Television Stations, the AWARN Alliance, the Consumer Technology Association, and the National Association of Broadcasters, Joint Petition Rulemaking, GN Docket No. 16-142 (Apr. 13, 2016) at ii-iii, 4-6.

The above list is hardly exhaustive. The innovative ATSC 3.0 standard would spur the development of products and services yet to be envisioned.

Notwithstanding today's fragmented video marketplace, local television remains a highly valued service by consumers who desire access to local news, weather, sports, public affairs, entertainment, emergency, and public safety information.<sup>6</sup> The ability of viewers to access local information in a timely fashion remains the cornerstone of the nation's congressionally mandated communications policy. The ability to strengthen, innovate, and enhance the services provided to consumers by local television stations will, given the ubiquitous nature of the service, benefit every viewer in the country.

The Commission should proceed to rulemaking without delay.

## II

### **The Affiliates Associations Support a Voluntary, Phased-In System of Implementation That Is As Simple As Possible for All Involved**

The Affiliates Associations agree with other commenters that the Commission should authorize a system of voluntary adoption and deployment of the ATSC 3.0 standard. The Affiliates Associations support, during an appropriate transition period, a simulcasting approach, as proposed in the Joint Petition, by which a station could elect to transmit using ATSC 3.0 and, for a reasonable transition period, arrange for simulcasting of its primary program stream by another local "host" station employing the existing ATSC 1.0 standard, and broadcasting the host station's programming in ATSC 3.0 until the transition is completed. Such a system will permit consumers

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<sup>6</sup> See, e.g., Katerina Eva Matsa, *Local TV audiences bounce back*, Pew Research Center (Jan. 28, 2104) ("local TV remains a top news source for Americans, with almost three out of four U.S. adults (71%) watching local television news"), available at <http://www.pewresearch.org/fact-tank/2014/01/28/local-tv-audiences-bounce-back/>; Bob Pappas, RTDNA Research: The Business of TV News (May 16, 2016), available at [http://www.rtdna.org/article/rtdna\\_research\\_the\\_business\\_of\\_tv\\_news](http://www.rtdna.org/article/rtdna_research_the_business_of_tv_news).

to enjoy an uninterrupted transition to the ATSC 3.0 standard, while imposing no additional costs on MVPDs, who would not be obligated to carry a station's signal in the ATSC 3.0 format.

The issuance of a *Notice of Proposed Rulemaking* by the Commission, looking toward the adoption of rules employing the approach proposed in the Joint Petition and endorsed by multiple commenters, is an important next step. Such an approach will permit a (1) voluntary; (2) market-driven; and (3) seamless and efficient system to permit the American public to realize the full benefits of ATSC 3.0.

Finally, the adoption of rules timed to permit the introduction of the new technical standard in sync with the repacking of the television bands following the spectrum auction will result in obvious economic efficiencies. Deploying the new standard in coordination with the post-auction repacking will allow stations to minimize costs by choosing necessary post-repacking equipment capable of broadcasting in the new standard. At the same time, consumer education will be an important key to a successful technical transition—a lesson learned during the DTV transition. Adopting rules to implement the ATSC 3.0 standard now will allow consumers to understand what is happening to their television sets and the potential new service enhancements that await them.

### **Conclusion**

For the foregoing reasons, the Affiliates Associations endorse the Joint Petition and respectfully urge the Commission to issue a *Notice of Proposed Rulemaking* to consider the implementation of rules that would permit television stations to voluntarily choose to operate using the ATSC 3.0 transmission standard.

Respectfully submitted,

**ABC TELEVISION AFFILIATES  
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/s/

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