



Joshua N. Pila  
General Counsel  
Local Media and Entertainment  
T 404-327-3286  
Joshua.pila@meredith.com

November 12, 2019

**VIA ECFS**

Marlene Dortch  
Secretary  
Federal Communications Commission

RE: Supporting Comments  
GN Docket No. 16-142

Dear Madam Secretary,

Meredith Corporation, which owns 17 television stations in 12 U.S. markets, supports the petition of the National Association of Broadcasters ("NAB") and America's Public Television Stations ("APTS") in the above-referenced docket to formulate rules to assist local television stations best take advantage of distributed transmission system ("DTS") technologies in the rollout of ATSC 3.0. Meredith commends NAB and APTS for their forward-thinking approaches, and encourages the Commission to move quickly to an NPRM with the hope of adopting final rules implementing the requested DTS relief in 2020.

In particular, the requested changes to the DTS rules will provide television broadcasters with additional flexibility to improve service throughout an entire license area, including communities near the edge of a station's service contour. Meredith believes that the proposed changes draw the right balance between allowing increased coverage while minimizing the potential for interference to other broadcasters. We support these changes, and hope the FCC will move quickly to an NPRM to develop a record and adopt final rules in 2020.

Very Truly Yours,

A handwritten signature in black ink, appearing to be "JP", written over a horizontal line.

Joshua N. Pila