

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
)	
Authorizing Permissive Use of the “Next)	GN Docket No. 16-142
Generation” Broadcast Television Standard)	
)	
Amendment of Section 73.626 of the)	
Commission’s Rules to Facilitate the)	
Deployment of Single Frequency Networks)	

COMMENTS OF ONE MEDIA 3.0, LLC

ONE Media 3.0, LLC (“**ONE Media**”) submits the following comments in support of the October 3, 2019, Joint Petition for Rulemaking (“**Petition**”) filed by America’s Public Television Stations and the National Association of Broadcasters (“**Petitioners**”) asking the Commission to amend section 76.626 of the Commission’s rules relating to Distributed Transmission Systems (“**DTS**”), also known as single frequency networks (“**SFN**”).¹ Specifically, the Petition asks the Commission to “amend its methodology for determining DTS service limits while preserving the current interference requirements.”²

The minor changes to the DTS rules proposed by the Petitioners would significantly improve the ability of television stations deploying ATSC 3.0 (“**Next Gen TV**”) to provide maximum coverage throughout their service areas. The Commission recognizes this potential value to Next Gen TV services, and has stated that “providing broadcasters with the ability to use

¹ America’s Public Television Stations and the National Association of Broadcasters, Joint Petition for Rulemaking, (October 3, 2019) (“**Petition**”); the Commission released a Public Notice on October 11, 2019, seeking comment on the Petition by November 12, 2019, and Reply Comments by November 27, 2019. Public Notice, DA 19-1036 (October 11, 2019).

² Petition at 2-3.

SFNs has the potential to make Next Gen TV services more robust.”³ However, the current rules restrict broadcast stations deploying Next Gen TV in combination with SFNs to provide amplified coverage levels near the edges of their service area.

Broadcasters have traditionally used a single transmission site to provide coverage to their service area, and have provided fill-in service using separately licensed secondary transmission sites.⁴ With SFNs, broadcasters employ additional lower power transmitter sites along with the primary transmitter site to boost signal levels, improving service to both fixed and mobile receivers. However, as discussed in the Petition, the current rules do not allow the noise limited service contour (“NLSC”) of SFN lower power transmitters to extend beyond either: (1) the NLSC of the reference facility on which the SFN is based; or (2) a circle around that facility with a radius that depends on the station’s band and location.⁵ These restrictions limit the use of lower power transmitter sites at the edges of a station’s service area.

The rule changes proposed in the Petition present a balanced approach to resolving this limitation. The Petition suggests minor rule changes that will give broadcast stations the flexibility they need to take advantage of the benefits of SFNs at the edges of their service areas, while preserving localism and avoiding interference. The Commission should consider this approach in a rulemaking proceeding (and should do so quickly) so that stations deploying Next Gen TV can plan their use of SFNs accordingly.⁶

³ *Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard*, Report and Order, GN Docket No. 16-142, FCC 17-158 ¶ 117 (2017) (“**ATSC 3.0 Order**”).

⁴ ATSC 3.0 Order ¶ 116.

⁵ Petition at 5; 47 C.F.R. § 73.626.

⁶ As discussed in the Petition, deployment of Next Gen TV is expected to increase dramatically in 2020. Petition at 10.

CONCLUSION

The changes to the current rules proposed by the Petitioners would significantly improve the ability of television stations deploying Next Gen TV to provide maximum coverage throughout their service areas. ONE Media urges the Commission to issue a Notice of Proposed Rulemaking seeking comment on the proposed changes as quickly as possible.

Respectfully submitted,

ONE Media 3.0, LLC

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