

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

COMMENTS OF PUBLIC MEDIA GROUP

Public Media Group (“PMG”) hereby submits its comments in response to the Media Bureau’s Public Notice¹ seeking comment on the Joint Petition for Rulemaking (“Petition”) filed by America’s Public Television Stations and the National Association of Broadcasters (jointly, “Petitioners”) requesting changes to the Commission’s rules applicable to distributed transmission systems (“DTS”).²

PMG is a public benefit corporation focused on the development and deployment of a market-neutral technology infrastructure that would expand consumers’ access to content and information. One of PMG’s goals is to facilitate nationwide market transitions to ATSC 3.0 that will enable the design, build, and deployment of single frequency networks (“SFNs”).³ As such,

¹ Public Notice, *Media Bureau Seeks Comment on Joint Petition for Rulemaking of America’s Public Television Stations and the National Association of Broadcasters Seeking to Amend Section 73.626 of the Commission’s Rules Related to Distributed Transmission Systems*, DA 19-1036, GN Docket No. 16-142 (released Oct. 11, 2019) (“Public Notice”).

² 47 C.F.R. § 73.626.

³ As the Commission has recognized, “SFNs are a technique that broadcasters use to transmit signals on the same frequency from multiple antennas in a local geographic area where it is not practical to serve the entire area with a single antenna.” *Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 9930, 9987 ¶ 115 n.343 (2017).

PMG shares the interest of the Commission and the Petitioners in facilitating private investment and removing regulatory barriers that would otherwise limit the development of SFNs and impede the deployment of ATSC 3.0.⁴

PMG supports Petitioners' request that the Commission amend its rules governing DTS operations to fully maximize the operation of SFNs for the development and deployment of ATSC 3.0. The Commission has recognized that "broadcasters that deploy ATSC 3.0 will have the ability to efficiently form SFNs" and that "providing broadcasters with the ability to use SFNs has the potential to make Next Gen TV services more robust."⁵ In recognizing the value of SFNs when initially adopting the ATSC 3.0 standard, the Commission declined to make any technical changes to its DTS rules, while leaving open the possibility that certain changes may be necessary in the future as the market develops.⁶

In the subsequent two years since ATSC 3.0 was adopted, broadcasters have made significant progress in their efforts to deploy the next generation of television service. The modest rule changes now proposed by Petitioners will allow broadcasters to continue that progress toward ubiquitous availability of ATSC 3.0, and it is appropriate for the Commission to consider them at this time.⁷

PMG specifically encourages the Commission to modify the limits in Section 73.626 of the Commission's rules⁸ that restrict the ability of DTS deployments to extend beyond the noise-

⁴ See *Authorizing Permissive Use of the "Next Generation" Broadcast Television Standard*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 9930 (2017).

⁵ *Id.* at 9988 ¶ 117.

⁶ *Id.* at 9988 ¶ 118.

⁷ *Id.* ("The Commission will monitor the deployment of ATSC 3.0 in the marketplace and will reconsider this issue in the future if appropriate.").

⁸ 47 C.F.R. § 73.626(c), (f).

limited service contours of the reference facility.⁹ One of primary benefits of DTS and SFNs is the ability to expand the functional service contours of a primary transmitter site into hard-to-serve areas within the station's market that are either far from the transmitter site or blocked by terrain features that attenuate the primary transmitter's signal. However, the limitations in the current DTS rules, initially adopted to limit a broadcaster's ability to significantly expand its service area using DTS transmitters, unnecessarily hinder the utility of SFNs that would otherwise facilitate ATSC 3.0 deployment. Adjusting the rules slightly to permit a DTS transmitter's noise-limited contour to exceed that of the reference facility under certain proscribed circumstances, as described by Petitioners, would help to achieve the important public interest benefits of improved coverage throughout a station's service area, as well as improved mobile coverage. The requested rule changes will not impact any current interference protections either caused by or received by DTS systems and will minimize the potential impact to stations in adjacent markets. Thus, Petitioners' proposed rule change results in no harm to adjacent services.

Based on the foregoing, as well as the arguments made in the Petition, PMG urges the Commission to amend Section 73.626 of its rules governing distributed transmission systems, thereby fully unleashing the benefits of ATSC 3.0 and single frequency networks.

Respectfully submitted,

PUBLIC MEDIA GROUP

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⁹ Petition at 4-5.