



November 11, 2019

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Re: GN Docket No. 16-142

Dear FCC,

Video content distribution is changing rapidly. Long gone are the days where broadcast television stations were the only option to distribute video programming. Today, content distributors have other options and it is important for television broadcasters to be able to respond quickly to the changing competitive landscape.

Therefore, Columbus Broadcasting Corporation, licensee of WCBZ-CD would like to comment in favor of modifying the DTS rules to allow greater flexibility in DTS transmitter placement.

Furthermore, we ask that Digital Class A television stations be included and allowed to utilize the same types of Distributed Transmitter Systems. We believe this is in the public interest for the following reasons:

- Class A stations have the same public service obligations as DTV stations.
- Class A stations provide the same children's programming as DTV stations.
- Viewers in DTS areas might be able to use smaller receive antennas. For viewers in communities that have no opportunity to install outdoor antennas, DTS systems could allow some of those viewers to receive more stations with indoor antennas.
- Viewers do not care what class of station they are watching; they want to be able to enjoy their favorite programs with a reliable signal and a minimum investment for their receive antenna.
- Expanding DTS options will provide a benefit to the economy through equipment purchases and installations.

WCBZ-CD TV22

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We also suggest that stations be allowed to negotiate interference agreements in cases where new interference might be caused.

I thank you for your time and consideration in this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Mark Hiner", written in a cursive style.

Mark Hiner

President

Columbus Broadcasting Corporation