

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Upgrade to the Next Generation)	GN Docket No. 16-142
Digital Television Service)	
)	

COMMENTS OF PEARL TV

Pearl TV (“Pearl”)¹ supports the joint petition for rulemaking filed by America’s Public Television Stations (“APTS”) and the National Association of Broadcasters (“NAB”)² and urges the FCC to promptly move forward with a Notice of Proposed Rulemaking to revise its rules on Distributed Transmission Systems (“DTS”) so that broadcasters transitioning to Next Gen TV can use DTS to deliver next-generation broadcasting to all of their viewers. Nearly two years ago, the FCC opened the door to more dynamic broadcasting services for consumers by permitting broadcasters to voluntarily deploy the ATSC 3.0 standard. By acting on the Joint Petition, it can continue in that vein, and ensure that more consumers can receive the many benefits of ATSC 3.0 from their local broadcaster.

¹ Pearl TV is a business organization of U.S. broadcast companies with a shared interest in exploring forward-looking broadcast opportunities. Pearl’s membership, comprising more than 400 network-affiliated TV stations, consists of eight of the largest broadcast companies in America including: Cox Media Group, the E.W. Scripps Company, Graham Media Group, Hearst Television Inc., Meredith Local Media Group, Nexstar Media Group, Gray Television, and TEGNA Inc.

² Joint Petition for Rulemaking submitted by America’s Public Television Stations and the National Association of Broadcasters, GN Docket No. 16-142 (Oct. 3, 2019) (“Joint Petition”).

The Commission adopted DTS rules to enable broadcasters to address the issues that broadcasters encounter due to topology in always delivering a high-quality over-the-air signal to each and every viewer in their station's contour. This is particularly true within large buildings, and in mountainous or hilly areas, where, as the Joint Petition explains, broadcasters have to use multiple translators, typically operating on separate channels, to reach certain populations.³ The DTS rules permit broadcasters to operate multiple synchronized transmitters (also called "single frequency networks" or "SFNs") *without self-interference and within their 6 megahertz channel* (thereby making available for other purposes channels used by translators) to improve their over-the-air signal in hard-to-reach areas of their contour.

The intention behind the DTS rules, in the Commission's own words, was to "distribute more uniform and higher-level signals throughout a DTV station's service area."⁴ Improved signal strength and quality is always a benefit to consumers, even more so with the unique picture and programming benefits that ATSC 3.0 will deliver. But the current rules fall short of their intended purpose. Two reasons explain this shortcoming. First, the limitations of ATSC 1.0 make it difficult for a broadcaster to deploy SFNs due to design complexity and cost. The good news is that ATSC 3.0 solves these problem; the new standard permits a simplified SFN design that will make these operations more cost effective. Second, under the current rules stations are unduly limited in where they can place DTS transmitters. The Joint Petition proposes a solution to this latter problem, one which will allow stations to significantly enhance the utility of SFNs—and thus the coverage of their service area—without the risk of encroaching on the service of stations in adjacent markets.

³ Joint Petition at 4.

⁴ *Digital Television Distributed Transmission System Technologies*, 23 FCC Rcd 16731, ¶ 14 (2008).

It is important to stress that this change can be made without causing interference or overlap issues between neighboring stations. The rule change proposed in the Joint Petition *does not alter* the requirement that DTS transmitters “not cause interference to another station in excess of the criteria specified in § 73.616”⁵ Further, the rule change *would not permit* the siting of DTS transmitters outside of a station’s noise-limited contour, any more than the current rule does, leaving the relevant provision unchanged: “Each DTS transmitter must be located within either the DTV station’s Table of Distances area or its authorized service area.”⁶ The purpose of the proposed rule change is to enable broadcasters to better serve their own communities, nothing more.

These hard-to-reach communities are perhaps even more in need of the benefits that ATSC 3.0 offers than a viewer better positioned vis-à-vis a station’s primary transmitter. Among the offerings that ATSC 3.0 provides, the new standard “will allow broadcasters to offer enhanced public safety capabilities, such as geo-targeting of emergency alerts to tailor information to particular communities and emergency alerting capable of waking up sleeping devices to warn consumers of imminent emergencies”⁷ Areas that are divided by terrain frequently have different weather, and may require different weather alerts. ATSC 3.0 provides these alerts, and by revising the DTS rules the Commission can ensure that broadcasters can reach everyone who needs to hear them over-the-air. SFNs can also help deliver quality signals

⁵ 47 C.F.R. § 73.626(f)(5).

⁶ *Id.* at § 73.626(f)(6).

⁷ *Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard*, 32 FCC Rcd 9930, ¶ 1 (2017).

to handheld and mobile devices, which may become increasingly important during weather and other emergencies.

Finally, the Commission noted that ATSC 3.0 would allow broadcasters to “use their spectrum more efficiently.”⁸ Modifying the DTS rules will enhance the efficiency of the spectrum even more. As discussed, broadcasters currently use translators, which typically operate on different channels, to broadcast to hard-to-reach areas within their contour. As broadcast spectrum is reduced, the ability to have multiple channels is a luxury many broadcasters cannot afford. If revised, the DTS rules would permit broadcasters to achieve the same effect *within one channel*, an efficiency that, per the Broadcast Incentive Auction, is highly valuable.⁹ Channels no longer occupied by translators could be repurposed for other uses.

* * *

Since the Commission authorized the voluntary deployment of ATSC 3.0, broadcasters have been hard at work to bring its benefits to consumers. Following successful innovation in the Phoenix test market, Pearl and its broadcast and industry partners plan to launch in numerous markets in 2020, reaching a significant number of households. Revised DTS rules will help ensure that the benefits of Next Generation TV reach each and every one of those homes. Pearl urges the Commission to promptly issue a Notice of Proposed Rulemaking on the Joint Petition to ensure that this rule change is available to support the widespread launch of ATSC 3.0.

⁸ *Id.*

⁹ See FCC, Incentive Auction: Reverse Auction - Winning Bids, https://auctiondata.fcc.gov/public/projects/1000/reports/reverse-winning_bids (last visited Nov. 4, 2019).

Respectfully submitted,

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