

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054**

In the Matter of)	
)	
Amendment of Section 73.626 of the)	GN Docket No. 16-142
Commission’s Rules to Facilitate the)	
Deployment Of Single Frequency Networks)	
)	
Joint Petition for Rulemaking)	

REPLY COMMENTS OF GRAY TELEVISION, INC.

Gray Television, Inc. (“Gray”) submits these reply comments in support of the joint petition for rulemaking filed by America’s Public Television Stations and the National Association of Broadcasters (together, “Petitioners”).¹ Gray encourages the FCC to expeditiously issue a Notice of Proposed Rulemaking to enact the minor changes to the Commission’s rules for Distributed Transmission System (“DTS”) and next generation single frequency networks (“SFNs”), which will allow broadcasters to more efficiently utilize spectrum to expand the reach of free local television services.

Gray owns more than 100 full-power and Class A television stations in 93 markets. Local news and service to local communities is the backbone of Gray’s stations, which are routinely recognized for excellence in journalism. In 2019, the RTDNA honored Gray’s local television stations with 57 regional Edward R. Murrow Awards and the Society of Professional Journalists awarded Gray three Sigma Delta Chi Awards.

¹ See Joint Petition for Rulemaking submitted by America’s Public Television Stations and the National Association of Broadcasters, GN Docket No. 16-142 (filed Oct. 3, 2019), <https://www.fcc.gov/ecfs/filing/1003981814754> (“Joint Petition”).

As part of its commitment to serve viewers in its local communities, Gray operates nearly 100 digital TV translators. These translators allow Gray to extend the signals of its television stations into areas that are otherwise unreachable due to distance or intervening terrain impediments. TV translators have several limitations, however, that do not make them practical in every instance. First, TV translators operate on a separate channel from the primary station. Accordingly, the ability of a station to expand its signal depends on the availability of channels in the market. Second, TV translators are secondary services subject to displacement. Indeed, many of Gray's TV translators were displaced as part of the post-Incentive Auction transition. Finally, TV translators are subject to stringent technical limitations that can restrict the reach of any one translator.

The minor changes to the DTS rules proposed in the Joint Petition will result in both immediate and future benefits for viewers in the markets in which Gray operates by allowing Gray to improve its free, over-the-air television service. The Joint Proposal will benefit both stations operating under the legacy ATSC 1.0 standard as well as stations that have already transitioned or may soon transition to the next generation ATSC 3.0 standard. As a result of restrictions in the existing DTS rules on the placement and reach of additional transmitters, Gray has not been able to implement DTS. If the Commission adopts the rules proposed in the Joint Petition, however, Gray intends to convert multiple stations to DTS, allowing Gray to deliver its award winning local broadcasting to more viewers in a manner that is both free and allows for an efficient use of scarce spectrum resources. Accordingly, contrary to the suggestion by one commenter, the Joint Petition is not "premature."²

² See Comments of The National Translator Association, GN Dkt. No. 16-142 (Nov. 12, 2019), at 1.

As Gray transitions its stations to the next generation ATSC 3.0 standard, the benefits of the changes proposed in the Joint Petition will be even more pronounced. ATSC 3.0 will allow Gray to provide better service to its viewers by providing more capacity to deliver quality programming, high resolution video services, and new data services that are not possible with existing technology. ATSC 3.0 also has the potential to enable geo-targeted programming, allowing Gray and other broadcasters to deliver the most relevant news, information, and other programming to each viewer. To maximize the ability to deliver these new and innovative services, broadcasters will need to employ SFNs, which utilize multiple transmitters similar to existing DTS networks to expand the reach and diversification of next generation broadcasts.

Unfortunately, the same limitations that have prevented Gray from utilizing DTS for its existing ATSC 1.0 stations threaten to undermine Gray's ability to utilize SFNs to recognize the full potential of ATSC 3.0. As the Joint Petition explains, the geographic limitations in the existing DTS rules apply a "lowest-common denominator approach" that artificially restrict DTS facilities to providing "unnecessarily weak signals throughout large portions of [stations'] service areas to match the correspondingly weak signals of single-transmitter facilities in the outer portions of their service areas."³ Put another way, by limiting the ability of DTS transmitters to reach the viewers who can benefit most from a distributed transmission network—those viewers near the edge of a station's service area—the existing rules undermine their own effectiveness. The amended rules proposed in the joint petition will allow Gray to provide a uniform level of service throughout its service area, ensuring that all viewers can benefit from the innovations and improved services that ATSC 3.0 offers.

³ Joint Petition at 10.

For these reasons, Gray strongly supports the Joint Petition and urges the FCC to move forward and swiftly issue a Notice of Proposed Rulemaking to amend its DTS rules as proposed in the Joint Petition.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'R. J. Folliard, III', with a long horizontal flourish extending to the right.

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