

November 26, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Reply Comments in Support of Joint Petition for Rulemaking on Distributed Transmission Systems (“DTS”), GN Docket No. 16-142

Dear Ms. Dortch:

The EW Scripps Company is writing in support of the joint petition for rulemaking filed by America’s Public Television Stations and the National Association of Broadcasters proposing a small change to the FCC’s Distributed Transmission Systems (“DTS”) rules.

The proposed rule change would give broadcasters more flexibility in deploying SFN technology (also known as “single frequency networks”). The ATSC 3.0 standard permits a simplified SFN design that can strengthen a station’s over-the-air signal in hard-to-reach areas, such as the edge of a station’s contour, or areas blocked by terrain or urban canyons, and can help deliver quality signals to handheld and mobile devices.

Scripps has been working to bring ATSC 3.0 to its viewers and wants to make sure all its viewers can receive the benefits of the new over-the-air standard. The proposed change to the DTS rules would help us do that.

We seek this change in the DTS rules as a way to serve our communities better. ATSC 3.0 promotes localism because it enables geo-targeted programming. The change recommended to the DTS rules will further promote localism because it will enable broadcasters to ensure through cost-effective SFN technology that specific areas of their communities are well-served over-the-air.

Our goal has always been to bring viewers to our over-the-air signal. Currently, there can be limitations with our over-the-air ATSC 1.0 technology, causing some viewers to experience issues receiving our important news and information content. Often these issues can be the result of terrain - canyons, mountains, skyscrapers, and the like. We feel the proposed rule change will pave the way for effective use of SFN technology, thus strengthening our stations’ OTA signals using the new 3.0 standard. As our markets experience an increase in over-the-air viewers, effective SFN technology will result in easier-to-receive signals in terrain- challenged areas.

Ms. Marlene H. Dortch
November 26, 2019
Page Two

Scripps is a local media company; our mission is journalism. Bringing important news and information programming to as wide an audience as possible supports our mission. The change to the DTS rules we are recommending will strengthen our ability to fulfill the OTA viewer's experience. We urge the Commission to move forward and issue a Notice of Proposed Rulemaking regarding the DTS petition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brian G. Lawlor". The signature is written in a cursive, flowing style.

Brian G. Lawlor