

TEGNA

November 27, 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,

TEGNA Inc. (“TEGNA”) hereby registers its support for the Joint Petition for Rulemaking on Distributed Transmission Systems (“DTS”) (“Joint Petition”), filed in this docket by America’s Public Television Stations (“APTS”) and the National Association of Broadcasters (“NAB”). TEGNA owns 62 television stations in 51 markets, and is committed to providing best-in-class service to each of its viewers. As part of that commitment, TEGNA has been a leader in the transition to ATSC 3.0, participating in the Phoenix model market program.

The Joint Petition’s proposal to modify slightly the DTS rules would make deployment of single frequency network technology more viable while maintaining the core protections against interference. This technology could be particularly helpful in many markets with coverage challenges, such as the mountainous terrain in Phoenix. To ensure our signal is provided to all of our viewers, our station KNAZ-TV (Flagstaff, AZ) operates as a satellite of KPNX, and we use numerous translators to boost our signal throughout the contour. As the Joint Petition illustrates, this is not the most efficient use of spectrum and the prospect of deploying ATSC 3.0, with its many enhanced features, encourages us to have a high-quality ATSC 3.0 signal throughout our contour. The simple change to the DTS rules as suggested in the Joint Petition would give TEGNA another option for providing all our Arizona viewers with the over-the-air signal quality they expect, without causing interference to neighboring stations.

Accordingly, TEGNA respectfully asks the FCC to move forward and issue a Notice of Proposed Rulemaking, so that the broadcast community can further discuss and debate this promising proposal.

Respectfully submitted,



Akin S. Harrison
Senior Vice President, General Counsel and
Secretary

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