

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re Matter of)
)
Authorization of Next Generation TV) **GN Docket No. 16-142**
for Permissive Use as a Television Standard)

To: The Commission

COMMENTS OF SPECTRUMEVOLUTION, INC.

1. SpectrumEvolution, Inc. (“SEI”) supports the Petition for Rulemaking in the above-captioned matter, filed by America’s Public Television Stations, the AWARN Alliance, the Consumer Technology Association, and the National Association of Broadcasters, seeking amendment of the Commission’s Rules to allow broadcasters to use the signaling portion of the physical layer of the new ATSC 3.0 (“Next Generation TV”) technical standard.¹ SEI was formed to advance the deployment of new technologies by television broadcasters and has participated in several Commission rulemaking proceedings to that end. Next Generation TV provides an important opportunity for a quantum leap in advancing the technology of television broadcasting. The Commission should move forward promptly with a formal rulemaking proceeding.

2. When the TV industry moves to Next Generation TV, hopefully without delay, it is important that Class A and Low Power Television (“LPTV”) stations be included from the start and not left out of the initial conversion opportunity. Congress has previously indicated its interest in new and innovative technologies for LPTV stations in the Digital Data Services Act

¹ The Commission invited comments on the Petition in a Public Notice, DA 16-451, released April 28, 2016.

(“DSSA”), 47 U.S.C. ¶ 336(h)(4).² The Commission should follow the lead of Congress and move quickly to “encourage the larger and more effective use of radio in the public interest.”³

3. SEI has access to granted construction permits for several hundred new LPTV stations. It believes that the early availability of Next Generation TV will greatly facilitate the early construction and economic success of these stations, because the currently available business models for LPTV are marginal, and success is difficult to achieve. With a new and more robust and versatile technology, existing barriers should be significantly diminished.

4. SEI further endorses the Comments of WatchTV, Inc., filed May 25, 2016, which discuss in more detail the anticipated benefits of ATSC 3.0, the reasons why Class A and LPTV stations should be included at the outset, and the reasons why the Commission should regulate the transition to ATSC 3.0 with a very light hand

Respectfully submitted,



Peter Tannenwald
Kathleen S. Victory

Counsel for SpectrumEvolution, Inc.

May 25, 2016

Fletcher, Heald & Hildreth, P.L.C.
Arlington, VA 22209-3801
Tel. 703-812-0404/0473
Fax 703-812-0486
E-mail: Tannenwald@fhhlaw.com
Victory@fhhlaw.com

² The fact that Congress granted DDSA authority to only LPTV stations suggests that it is more than willing to allow LPTV stations to take the lead in implementing new technologies; so if the Commission is concerned about how soon full power stations should be allowed to implement Next Generation TV, it should eliminate restrictions on at least LPTV stations, if not Class A stations as well, and let them try out the new technology first.

³ 47 U.S.C. § 303(g).

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