

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Media Bureau Seeks Comment on Joint)	
Petition for Rulemaking of America’s Public)	
Television Stations, the AWARN Alliance,)	GN Docket No. 16-142
the Consumer Technology Association, and)	
the National Association of Broadcasters)	
Seeking to Authorize Permissive Use of the)	
“Next Generation TV” Broadcast Television)	
Standard)	

COMMENTS OF COX MEDIA GROUP

Cox Media Group (“CMG”), by its attorneys and pursuant to Section 1.415(b) of the Commission’s rules, hereby files these comments in the above-captioned proceeding.¹ CMG strongly supports the Joint Petition and urges the FCC to commence a rulemaking expeditiously to adopt the proposals contained therein.²

I. INTRODUCTION

CMG is an integrated broadcasting, digital media, publishing, and direct marketing company that includes, among other properties, broadcast television and radio stations, daily and weekly newspapers, and more than 100 digital services. Today, CMG owns or operates 14 full-

¹ Media Bureau Seeks Comment on Joint Petition for Rulemaking of America’s Public Television Stations, the AWARN Alliance, the Consumer Technology Association, and the National Association of Broadcasters Seeking to Authorize Permissive Use of the “Next Generation TV” Broadcast Television Standard, *Public Notice*, GN Docket No. 16-142, FCC 16-451 (rel. Apr. 26, 2016) (the “*Public Notice*”). The FCC issued the *Public Notice* following the submission of a Joint Petition for Rulemaking that asks the Commission to modify its rules to permit broadcasters to broadcast in the new ATSC 3.0 (“Next Generation TV”) broadcast transmission standard. *See* Joint Petition for Rulemaking of America’s Public Television Stations, The AWARN Alliance, The Consumer Technology Association, and the National Association of Broadcasters, GN Docket No. 16-142 (filed Apr. 13, 2016) (the “Joint Petition”).

power stations in 10 markets nationwide, which reach more than 12 million households or 11% of the U.S. population.

CMG has been and continues to be firmly committed to the development and implementation of the Next Generation TV standard. This new standard promises to offer both broadcasters and TV viewers a once-in-a-lifetime opportunity to profoundly improve a service that means so much to so many Americans. As described below, the Joint Petition's proposal for voluntary adoption of Next Generation TV guarantees that this transition will work only if viewers demand it. And the FCC can pursue this market-based approach without taking spectrum or resources away from other communications services that depend on spectrum. This is a win-win-win for broadcasters, consumers, and the FCC, and the Commission should move forward with the proposals in the Joint Petition with all practical speed.

II. NEXT GENERATION TV WILL ENOURMOUSLY IMPROVE BROADCASTERS' SERVICE TO TV VIEWERS

An unprecedented group of representatives of broadcasters and equipment manufacturers filed the Joint Petition advocating for the adoption of Next Generation TV because the benefits provided to the local communities will far exceed the costs borne by the stations to upgrade their facilities.

CMG itself has invested significant resources in the development of Next Generation TV and now joins with its industry partners to urge adoption of the new standard because CMG believes Next Generation TV promises CMG's viewers exciting, innovative services and nearly endless new possibilities. Next Generation TV will be exponentially better TV, with functional improvements that will include Ultra High Definition video, additional free over-the-air program streams, a more immersive and engaging audio experience, the potential for targeted programming that will personalize the viewing experience, and improved in-home reception.

Next Generation TV also will be different and expanded TV, opening up new opportunities for reception on mobile devices, interactive experiences, and efficient datacasting that could revolutionize how content is delivered to consumers. And, the increased programming capacity accompanying introduction of Next Generation TV will mean more opportunities for airing local news, sports, weather, and informational coverage as well as increased quantities of children's programming.

Next generation TV will improve how broadcasters like CMG carry out their responsibilities to serve their most vulnerable viewers. The Joint Petition details how the new AWARN advanced emergency alerting capabilities in Next Generation TV will far exceed the capabilities of the current EAS system. CMG's viewers will receive more focused, more tailored information at the crucial times when they need it most. The new alerting system also will provide videos, photos, maps, and audio allowing public safety officials to provide critical emergency information to viewers. Moreover, the new standard will lead to improved accessibility for the hearing and visually impaired. Next Generation TV will provide significant technical advances that will permit multiple closed-captions or subtitles, assistive audio services, and language tracks. These advances will allow broadcasters to reach many viewers within their local communities that are underserved today.

III. ADOPTION OF NEXT GENERATION TV WILL BE ENTIRELY VOLUNTARY AND MARKET-DRIVEN, PLACING NO BURDENS ON BROADCASTERS, CONSUMERS, OR THE GOVERNMENT

All the public interest benefits of Next Generation TV can and will be achieved without any risk of harm to industry stakeholders, consumers, or the FCC. CMG strongly supports the Joint Petition's concept that broadcaster – and consumer – adoption of the Next Generation TV standard should be entirely voluntary. Under the Joint Petition proposal, no broadcaster would be forced to adopt the standard; no viewer would be forced to buy a new Next Generation TV

set; and no consumer electronics manufacturer would be forced to include Next Generation TV tuners in consumer products.

CMG firmly believes that, unlike the DTV transition, the Next Generation TV should be consumer and market driven. Only those stations that desire to implement the new technology – or whose viewers demand it – should be required to make the investment necessary to roll out Next Generation TV. CMG is confident that once viewers become aware of the many benefits of Next Generation TV, they will quickly drive the transition from the current transmission standard to the Next Generation standard. This new standard is so attractive, CMG has no doubt that industry and consumer adoption will be quick and transformative. But until that happens, Commission action to approve Next Generation TV should not and, under the Joint Petition, will not deprive any viewer of the over-the-air television service they enjoy today.

Equally important, the FCC can authorize Next Generation TV according to the plan laid out in the Joint Petition without compromising the availability of spectrum for other consumer services like wireless broadband. The transition to Next Generation TV will not require allocation of excess spectrum to TV services. Stations will use the spectrum they have today, and the Next Generation TV standard will help them use it more efficiently than they ever have before.

IV. CONCLUSION

If the FCC adopts the blueprint laid out in the Joint Petitions, Americans will receive a new and vastly improved free television service and the myriad public interest benefits described above, without the need to allocate additional spectrum to broadcast television stations; without the need for government funding; without the need for consumer equipment mandates; and without causing any interference issues or increasing the demand for scarce spectrum. The

proposals included in the Joint Petition are a low risk, high reward proposition that serve as an example of how industry led development of innovative technologies can advance the public interest without the need for extensive government regulation or mandates. This proceeding could be, and should be, the beginning of a proud new chapter in the history of the nation's over-the-air television service. CMG urges the FCC to move this proceeding ahead promptly and to adopt the roadmap to a brighter TV future proposed in the Joint Petition.

Respectfully submitted,

COX MEDIA GROUP

/s/

Michael D. Basile
Jason E. Rademacher
Cooley LLP
1299 Pennsylvania Ave., NW
Washington, D.C. 20004

Its Attorneys

May 25, 2016