

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of )  
 )  
Joint Petition for Rulemaking to Authorize ) GN Docket No. 16-142  
Permissive Use of the “Next Generation TV” )  
Broadcast Standard, ATSC 3.0 )  
 )  
 )

To: The Media Bureau

**COMMENTS OF**  
**AMERICAN TOWER CORPORATION**

American Tower Corporation (“American Tower”) hereby submits its initial comments in response to the April 26, 2016 Public Notice issued by the Media Bureau.<sup>1</sup> The Public Notice seeks comment on the Joint Petition for Rulemaking (“Joint Petition”) filed April 13, 2016 by America’s Public Television Stations, The AWARN Alliance, The Consumer Technology Association, and The National Association of Broadcasters asking the Commission to “amend its rules to allow broadcasters to use the signaling portion of the physical layer of the new ATSC 3.0 (Next Generation TV) broadcast standard, while they continue to deliver current-generation DTV broadcast service to their communities.”<sup>2</sup>

American Tower supports the Joint Petition and urges prompt Commission action to implement it. By doing so, the Commission will not only promote more efficient use of spectrum to the benefit of the viewing public, but it will also set the stage for a market-driven

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<sup>1</sup> *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 Standard*, GN Docket No. 16-142, Public Notice, DA 16-451 (MB rel. April 26, 2016).

<sup>2</sup> *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) at 1.

adoption of Next Generation TV. Moreover, by acting quickly, the Commission will enable TV licensees to more effectively and efficiently plan a potential transition to ATSC 3.0 as many of these licensees will be evaluating their technical needs as part of the Incentive Auction repacking process.

In supporting the Joint Petition, American Tower is not recommending any change to the FCC's rules and procedures governing the Incentive Auction – either in the 39-month repacking period or the reimbursement eligibility rules. American Tower seeks only prompt Commission action to allow TV stations to evaluate their Next Generation TV options during the upcoming repacking period following the conclusion of the Incentive Auction. Assuming that ATSC 3.0 will be authorized at least as an option eventually, planning now will allow TV stations to save expenses that otherwise would be incurred to change RF transmission equipment first for the repack and then again for ATSC 3.0. Such planning could minimize the duration of any over-the-air downtime by aligning tower repack work with any necessary ATSC 3.0 tower work, as well as reduce the risk to tower crews by limiting the number of times they will need to climb the towers. In sum, prompt grant of the Joint Petition will promote the public interest without upsetting the Incentive Auction or viewers' access to their favorite TV stations.

## **BACKGROUND**

Founded in 1995, American Tower is a leading independent owner, operator and developer of wireless and broadcast communications real estate, including wireless towers, broadcast towers, in-building systems, outdoor distributed antenna systems, other right-of-way options and managed rooftops. American Tower's primary business is leasing antenna space on multiple-tenant communications sites to wireless service providers, radio and television broadcast companies, wireless data providers, government agencies and municipalities, and

tenants in a number of other industries. In addition to the communications sites in its portfolio, American Tower manages rooftop and communications sites for property owners. Our tower portfolio consists of approximately 40,000 towers in the U.S., both those that we own and those that we operate pursuant to long-term lease arrangements. American Tower offers a range of site-related services domestically, including site acquisition, zoning and permitting services and structural analysis services. These services are a part of the wide array of solutions that American Tower provides to meet its customers' needs, whether this is their first lease or if they are adding additional equipment.

As a tower company with a nationwide portfolio, many of American Tower's existing and new clients will be affected by the repack process that will result from the Incentive Auction. For that reason, American Tower has been participating actively in related FCC proceedings.<sup>3</sup> American Tower's top concerns have been to promote tower worker safety and an efficient repack process through advance planning.

## **DISCUSSION**

American Tower's clients will be affected not only by the Incentive Auction repack but also by the roll-out of ATSC 3.0 Next Generation TV. ATSC 3.0 is the world's first IP-based broadcast standard that specifies an entire next-generation broadcasting system, from the RF transmission through presentation to the viewer or listener. Next Generation TV will provide viewers a more immersive and enjoyable viewing experience on both home and mobile screens and will set the stage for future enhancements. ATSC 3.0, however, may require changes in a TV station's transmission equipment, such as adding vertical polarization components necessary for

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<sup>3</sup> See, e.g., Comments of American Tower Corporation, GN Docket No. 12-268 (November 4, 2013) (comments on Widelity Report re repacking reimbursement expenses); Comments of American Tower Corporation, GN Docket No. 12-268 (April 21, 2014) (comments on catalog of potential expenses and estimated costs).

reception by mobile devices and increasing transmission line capacity to handle additional power requirements.

The Joint Petition requests that the Commission adopt rules to allow television stations to implement ATSC 3.0 on a voluntary, market-driven basis. More specifically, the Joint Petition asks the Commission to (1) “approve the Next Generation TV transmission standard as a new, optional standard for television broadcasting;” (2) “approve certain rule changes to permit local simulcasting to enable Next Generation TV to be deployed while ensuring that broadcasts in the current DTV standard remain available to viewers;” and (3) “specify that Next Generation TV transmission is ‘television broadcasting’ in parity with the current DTV standard, and otherwise to conform Sections 73, 74 and 76 of [the] rules to permit the deployment of this innovative new standard.”<sup>4</sup> Under the proposed approach, a temporary “host” broadcaster in a market would agree to simulcast on its airwaves the other DTV signals of those stations broadcasting with ATSC 3.0. The “host” station’s programming would reciprocally be carried as a programming stream by one of the stations deploying the Next-Gen TV standard. No additional spectrum or government funds are required for the new standard, and consumers would not be subjected to any equipment mandates.

American Tower supports prompt Commission action to initiate a Notice of Proposed Rulemaking to implement the goals of the Joint Petition and to adopt the proposed rules that will allow voluntary deployment of ATSC 3.0. The repacking of the TV broadcast spectrum that will be required at the conclusion of the Incentive Auction is an excellent opportunity for TV stations to “future-proof” their RF transmission facilities by taking into account the new transmission equipment required for ATSC 3.0, at the same time the stations evaluate and then implement their repacking obligations. In addition to considering the potential benefits of Next Generation

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<sup>4</sup> *Id* at iv.

TV in providing new and innovative services to its viewers, including enhanced emergency alerting capability, a TV licensee allowed to implement ATSC 3.0 voluntarily on its own timeline may be able to minimize the number of times specialized crews are required to work on its tower, thereby reducing both the risks to tower workers and the disruptions all licensees (TV and otherwise) face when tower work is being conducted.

Specifically, if the Joint Petition is promptly granted, a TV licensee subject to repacking would be able to also evaluate its tower's structural loading and physical space to consider the impact of any necessary change in transmission equipment on the tower, such as the increase in weight and wind load for either a new single frequency or broadband antenna with an added vertical polarization component as needed for ATSC 3.0, or any requirements for an increase in transmission line size or for multiple lines to handle the additional power associated with vertical and/or variable polarization antennas. A TV licensee also could evaluate the need for changes to its building and mechanical system to accommodate the transmitter power increase required for the addition of a vertical polarization component (*e.g.*, evaluating the floor space needed to add larger transmitters while staying on the air and evaluating mechanical systems like transmitter cooling, HVAC, electrical power and generator needed to support larger transmitters and filters).

As noted above, in recommending prompt action on the voluntary actions proposed in the Joint Petition, American Tower is not taking a position on whether ATSC 3.0 eventually should be adopted as a mandatory standard. Nor is American Tower recommending any change in the 39-month repacking period adopted by the Commission. Finally, American Tower is not requesting that the expenses incurred by a TV station to evaluate, facilitate or implement ATSC 3.0 during the repack period be considered eligible expenses for repacking reimbursement.

American Tower asks only that TV stations be provided the opportunity and encouragement to plan for Next Generation TV while they are evaluating and implementing their repack options. Such planning can minimize unnecessary work on towers, thereby reducing industry costs and enhancing tower crew safety.

Respectfully submitted,

AMERICAN TOWER CORPORATION

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