



May 26, 2016

VIA ECFS

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

Re: GN Docket No. 16-142
Support for Authorization of Next Generation TV for Permissive Use as a
Television Standard

Dear Ms. Dortch:

Sinclair Broadcast Group, Inc. (“Sinclair”) hereby joins the National Association of Broadcasters, America’s Public Television Stations, the AWARN Alliance, and the Consumer Technology Association (collectively, the “Petitioners”) in their request that the FCC approve the Next Generation TV transmission standard as an optional transmission standard for television broadcasting (the “Petition”).¹ The diverse industries and policy interests represented by the Petitioners demonstrate that the time is right, and consumers are ready, for the new, innovative services that an IP-based broadcast transmission standard can offer.

Over-the-air television broadcasting is a core value of American telecommunications policy. Next Generation TV will bring this service into the 21st century so that its users and viewers can take advantage of the variety of technological developments that have shaped the digital information age. The Petition articulates quite clearly what those improvements are. This Commission has made leading the world in deployment of advanced communications technologies a central priority. Sinclair is prepared to do its part to implement Next Generation TV as expeditiously as possible following FCC approval.

Next Generation TV will marry the efficiency of the one-to-many delivery platform that is broadcasting with the IP-based applications ecosystem that drives broadband innovation. For the first time, broadcasters will be empowered to introduce new competitive video services into the home and for mobile access. Next Generation TV will also allow broadcasters to contribute to, and their viewers to benefit from, the ever-growing “app ecosystem” that continues to provide new options for video and other important information services. These services may provide healthy competition with current wired and wireline video services, or they may turn out to be complementary to those services, or they may be both. Market forces will decide these outcomes, but, whatever the outcome, we are certain that viewers will have new choices as a result of Next Generation TV. This Commission is particularly committed to facilitating competition for video services that will allow consumers a wide range of choices, and Next Generation TV will be an important new element in that mix.

¹ See Joint Petition for Rulemaking, April 13, 2016, GN Docket No. 16-142 (released April 26, 2016).



Next Generation TV will also enhance the important local information services that only broadcasting can provide to its communities. Greater channel capacity may increase the amount of programming that broadcasters can deliver to their communities. The ability to target specific geographic areas within a station's signal area will allow for hyper-local messaging, not only from a news and community affairs perspective, but could also include new opportunities for small business owners to advertise to smaller areas over broadcast television (which may otherwise be prohibitively expensive, especially in larger markets). And emergency alerts can be meaningfully enhanced with rich media and other, more detailed, lifesaving information via Next Generation TV to consumers as well as first responders. New, cost-effective programs that serve communities in the area of digital education will also be made possible via Next Generation TV.

We urge the FCC to time its adoption of Next Generation TV with the post-auction repack of the television band. The flexibility of the Next Generation TV standard, especially when combined with new transmission architectures, could provide important new tools to mitigate the disruption and signal coverage compromises expected to result from repacking.

We appreciate the FCC's promptly releasing the Petition for public comment and urge the FCC to move quickly to issue a notice of proposed rulemaking and ultimately towards approving the rule changes requested in the Petition. By the end of 2016, Sinclair will have invested over \$30 million in Next Generation TV and related technology and migration plans, which demonstrates our commitment to, indeed our doubling down on, over-the-air broadcasting. We look forward to working with the FCC staff toward a successful migration to Next Generation TV.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca Hanson". The signature is written in a cursive, flowing style.

Rebecca Hanson
SVP, Strategy and Policy