

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Upgrade to the Next Generation) GN Docket No. 16-142
Digital Television Service)

COMMENTS OF TEGNA, INC.

TEGNA, Inc. (“TEGNA”) urges the Commission to promptly move forward with a Notice of Proposed Rulemaking on adoption of Advanced Television Systems Committee (“ATSC”) 3.0, also called Next Generation TV, to permit broadcasters to elect to deploy this new standard on an optional basis. TEGNA owns and/or provides services for 46 television stations across 23 states and is the largest independent station group of major network affiliates in the top 25 markets. TEGNA stations reach approximately one-third of all television households nationwide. TEGNA is eager to begin deploying Next Generation TV to provide additional services to these viewers.

The benefits of Next Generation TV are substantial: consumers will experience higher quality picture and sound, receive enhanced emergency alert information, and have the ability to receive reliable programming on mobile and handheld devices such as tablets and smartphones. Furthermore, the deployment process will be largely market-driven and will not require the Commission to allocate any funds or spectrum. TEGNA urges the Commission to move ahead toward a notice of proposed rulemaking so that these benefits can be brought to the American public as expeditiously as possible.

I. Next Generation TV Provides Viewing Enhancements and Public Safety Benefits to Consumers.

Next Generation TV will provide myriad significant benefits to consumers. Of particular importance to TEGNA and its communities, it will permit a dramatically enhanced viewing experience, increase emergency alert capability, and permit reliable mobile broadcasting. Next Generation TV will support video resolutions beyond HD, higher frame rates, wider color gamut, and high dynamic range (“HDR”) video on both home and mobile screens. Next Generation TV also will support advanced features, such as the ability to offer multiple views associated with the same program, displayed on a single screen or on multiple screens, as well as new opportunities for viewer personalization and interactivity.

Particularly important in today’s television ecosystem, in which over-the-air reception in the home is becoming increasingly important and viewers value mobility, the robust nature of Next Generation TV transmissions will enable improved indoor reception and enhanced mobile broadcasting capability. With ever-greater numbers of American households relying, in whole or in part, on over-the-air broadcasting to receive television programming, more robust in-home reception will heighten the ability of the public to receive not only high-quality entertainment programming but also enhance the public’s access to life-saving news, emergency, and weather broadcasts. Mobility will also expand the reach of these broadcasts and greatly enhance the ability of the public to receive them and other sought-after programming on the go. Unlike previous iterations of mobile TV, Next Generation TV builds in native mobility from the very beginning, and has been engineered to serve devices in motion. TEGNA has been a leader in deploying Mobile DTV, as part of the Pearl/MCV venture, and learned through this process that mobility is highly valued in the communities that TEGNA serves. We are enthusiastic about being able to deploy this new, natively mobile standard.

II. The Market-Driven Deployment Model Proposed in the Petition Will be Effective in Bringing Next Generation TV to the American Public.

The petition proposes parallel implementation of Next Generation TV with the existing digital television standard in a voluntary, market-based manner. This deployment strategy will permit communities to have access to stations that have deployed Next Generation TV while also having access to all the stations that will continue to transmit using the current DTV standard. The transition will be effectuated by broadcasters arranging to simulcast their respective signals so that all viewers will be able to receive their signal free and over-the-air in the format they choose. TEGNA has studied this proposal in detail, and believes that it is feasible technically, commercially and practically. The petition's proposal will prevent viewers from being disenfranchised during the deployment process, but will permit the broadcasting industry to voluntarily deploy an important new technology. This is an important building block for the future of the television industry and our ability to serve local communities. TEGNA urges the Commission to approve the rule changes required to permit this type of parallel implementation, which will serve to preserve the Commission's resources while giving broadcasters a strong incentive to voluntarily move forward. Under this approach, the Commission can rely on market solutions to ensure smooth deployment.

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Adopting the Next Generation TV standard and permitting stations to deploy it on a voluntary basis will provide consumers with substantial viewing and public safety benefits. Acting now will allow stations to use the opportunity of the spectrum auction repack to upgrade their transmitters and provide this new service to their communities. TEGNA urges the FCC to promptly issue a Notice of Proposed Rulemaking on this issue to enable it to approve the new

standard and make the ministerial rule changes and pronouncements required to implement the voluntary transition to Next Generation TV.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kurt Wimmer", is written over a horizontal line.

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