

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 RAYCOM MEDIA, INC.

Raycom Media, Inc. (“Raycom”) urges the Commission to promptly move forward with a Notice of Proposed Rulemaking on adoption of the additional broadcast transmission standard developed by the Advanced Television Systems Committee (“ATSC”), Next Generation TV, and to allow broadcasters the option to implement this new standard (“Next Generation TV” or “ATSC 3.0”) while they continue to deliver current-generation DTV broadcast service to their communities. Raycom owns 51 full-power television stations in 19 states, and is deeply invested in providing the best service possible for these communities. Next Generation TV would give Raycom a revolutionary new tool to intensify its service to the public.

Raycom serves audiences in cities such as Cleveland and Richmond, and smaller communities such as Jonesboro, Arkansas and Lawton, Oklahoma. The benefits of Next Generation TV will be substantial for viewers in markets of all sizes: 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 market-driven and will not require the Commission to allocate any funds or spectrum. Raycom urges the Commission to act in a timely manner so that deployment can occur at the same time as the spectrum auction, enabling

stations that will be repacked to install future-ready equipment that will permit the deployment of Next Generation TV for no more cost than replacing the current legacy system.

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

Next Generation TV will provide myriad significant benefits to consumers. In particular, it will facilitate 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. Not only will Next Generation TV support the current latest technology -- 4K ultra-high definition (“UHD”) transmissions -- it will ensure that advances to come, including 8K transmissions and beyond, will be able to be implemented without any need for additional regulatory action. Along with higher resolution and better picture quality, Next Generation TV will support a deeply immersive audio experience with accurate sound localization, customizable sound mixes, and a greater sense of spatial sound envelopment.

Beyond dramatically improved picture and sound, Next Generation TV will support the ability to offer multiple views associated with the same program, displayed on a single screen or on multiple screens. For example, users could experience a panoramic view of sports programs, with multiple views of an event integrated seamlessly into the picture, and the ability to pan, zoom or select individual views from different camera angles. Next Generation TV could also allow an unprecedented level of viewer personalization and interactivity. Users could access related secondary content -- such as extra information (player statistics, product information, in-depth news), alternate versions of the primary content, user-generated content, and interactive content -- and be able to set their preferences for this content so it would be generated

automatically. Dynamic flexibility is built into Next Generation TV. For example, when a football game goes into overtime, some viewers could continue watching it, while others could elect to watch the regularly scheduled programming transmitted by the same broadcaster.

Raycom serves a number of communities in regions that are subject to hurricanes, tornadoes, tsunamis and other natural disasters. The new standard will also enable life-saving advancements in emergency alerting, which Raycom believes will have a significant impact in the communities it serves. Broadcasters will be able to deliver reliable and robust mobile alerts to smart phones, tablets and fixed TV receivers without the inherent incapacity of one-to-one mobile phone architecture that may fail in crisis situations when the system is overloaded with users. Advanced emergency alerting options in Next Generation TV could include (1) signaling that permits receivers to alert consumers of an emergency even when the receiver is powered off; (2) localization filtering of emergency alerts to tailor information for specific geographic areas; and (3) enhanced datacasting to serve law enforcement, first responder, and emergency management organizations more efficiently. Broadcasters will be able to deploy these new services in addition to those that are required by regulation to provide a more fulsome, capable system for the benefit of the public.

Next Generation TV also will allow dramatic improvements in the robustness of signals, enabling improved indoor reception and enhanced mobile broadcasting capability. Raycom has implemented Mobile DTV in multiple markets as part of the Pearl/MCV project, and found that its audiences were enthusiastic about receiving broadcast signals on mobile devices. 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. Raycom urges the Commission to approve the Next Generation TV transmission standard as a new, optional standard for television broadcasting so that the process of creating these benefits for the public can begin.

II. A Market-Driven Implementation Proposal for Next Generation TV Will Be Effective to Deploy This Service for the Benefit of the Public.

Unlike the analog-to-DTV transition, the implementation plan proposed by the petition provides for parallel implementation with the existing digital television standard in a voluntary, market-based manner. This means that in one DMA, consumers would have access to stations that have deployed Next Generation TV while also having access to all the stations which 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. Raycom is working to model this implementation plan, and believes it is feasible and will result in the deployment of new technology that will serve the public interest.

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Raycom 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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May 26, 2016