

Narrative Statement
KUPN Licensee, LLC
Request for Part 5 Experimental Authority

On behalf of KUPN Licensee, LLC, and pursuant to the Part 5 Experimental Radio Service rules and regulations of the FCC, the applicant hereby respectfully requests approval for the instant ATSC 3.0 experimental application for special temporary authority (“STA”) to conduct experimental testing using a full-power DTV facility to evaluate ATSC 3.0 prototype technologies. In particular, the applicant is proposing to multiplex the vacant, interference-free Channel 45 in the Las Vegas market, using the antenna that is currently being used by applicant-licensed stations KSNV(TV) and KVCW(TV), Las Vegas, Nevada. Among other things, the requested STA will be used to test ATSC 3.0 technologies and standards and will permit a comparison to the current operational standard. The applicant intends to use the information gathered to further develop the ATSC Digital Standard, for the benefit of the viewing public at large.

The applicant hereby respectfully requests expedited Media Bureau approval for an initial period of **six months** to conduct the required prototype testing. It is the applicant’s intent to begin the experimental testing immediately upon issuance of the Media Bureau’s authorization (and to do so in compliance with the terms of the authorization and the pertinent FCC Rules).

In addition to the requested testing of the prototype technology, the applicant is also planning to provide television reception demonstrations of transmissions to the public at the rapidly approaching **January 2-9**, *Consumer Electronics Show*, and the **April 16-21**, *National Association of Broadcasters Show*, both in Las Vegas. The applicant would like to begin the required testing for the planned demonstrations as soon as possible and far enough in advance of the CES and NAB shows to ensure successful demonstrations.

As described in the **Engineering Statement** submitted along with the instant application and prepared by John E. Hidle of Carl T. Jones Corporation (Mr. Hidle’s experience is a matter of record before the FCC), the instant proposal fully complies with the relevant technical rules and regulations of the Commission and will not adversely impact the operations of any station. As show in the **Engineering Statement**, the applicant is seeking approval for authority up to the maximum of the stations’ licensed ERP of 1000kw; however, the actual experimental ERP *will remain below* the licensed ERP and will be adjusted as needed to determine the impact of ATSC 3.0 reception quality as part of the experimental process.

The applicant submits that a grant the instant application is in the public interest because the information and data obtained from the tests will be valuable in evaluating the future use and development of ATSC 3.0 technology, equipment, systems and services for use by the public.