

**Supporting Statement
Request for Experimental Authorization
KSAZ-TV, Phoenix, AZ, Facility ID 35587**

NW Communications of Phoenix, Inc. (“Licensee”), licensee of full power television station KSAZ-TV, Phoenix, AZ (Facility ID 35587) pursuant to 47 C.F.R. §§ 5.201, 5.601 and 5.602 (as applicable), respectfully requests that the Commission grant an Experimental Authorization to allow the Licensee to commence ATSC 3.0 operations on KFPH-CD, Phoenix, AZ (Facility ID 2739) (“Host”), beginning on or about August 3, 2018 until such time as the necessary license applications are available for filing.¹

The Licensee hereby submits the following information together with the attached Engineering Statement in support of the instant request:

Originating Station:

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- (i) Call Sign: KSAZ-TV
- (ii) Facility ID: 35587
- (iii) Community of License: Phoenix, AZ
- (iv) Channel Number: 10 (RF and Virtual)
- (v) Designated Market Area (DMA): Phoenix (Prescott) Designated Market Area (“DMA”)
- (vi) Station technical data: please see attached Engineering Statement as well as Licensee’s authorization (File No. BLCDDT-20100302AAI)

Host Station:

- (i) Call Sign: KFPH-CD
- (ii) Facility ID: 2739
- (iii) Community of License: Phoenix, AZ
- (iv) Channel Number: 35 (RF)
- (v) Designated Market Area (DMA): Phoenix (Prescott) DMA
- (vi) Station technical data: please see attached Engineering Statement as well Host Station’s authorization (File No. BLDDTA-20110405AAY)

¹ See *In the Matter of Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard*, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 9930 (rel. Nov. 20, 2017) (“hereinafter “Report and Order”). The majority of the rules authorizing ATSC 3.0 service became effective March 7, 2018, with the local simulcasting rules effective July 17, 2018. Next Gen TV Rules Receive OMB Approval, Public Notice, DA 18-736 (July 17, 2018).

Experimental Authorization is required because the Commission has not finalized the forms required for authorization for stations to commence ATSC 3.0 operations.² As demonstrated below, there is good cause in these circumstances to grant an Experimental Authorization to permit the KSAZ-TV to commence ATSC 3.0 operations.

On March 29, 2018, the Commission granted Experimental Authorization beginning March 31, 2018 to KFPH-CD,³ and the station is operating as the first “lighthouse” station in the Phoenix, AZ television market. As outlined in the underlying application, the Host is participating with other stations in the Phoenix (Prescott) DMA in the implementation of ATSC 3.0. Phoenix was chosen as a model “test bed” market because it is Phase 1 of the post-Incentive Auction “repack.”

Licensee is applying to be the second station in the same DMA to transmit in ATSC 3.0. The “test bed” will allow stations and their industry partners to (1) test core television service as well as new business models; (2) develop a common service framework to facilitate nationwide deployment of ATSC 3.0 service, including best practices and mechanisms for optimizing ATSC 3.0 for consumers, broadcasters, multichannel video programming distributors (“MVPDs”), the consumer electronics industry, and network providers; (3) test consumer devices; and (4) provide an opportunity for real-time consumer input on the ATSC 3.0 consumer experience, including through surveys and focus groups.

As set forth in the *KFPH-CD Authorization Letter*,⁴ the Licensee is seeking authority to join the Phoenix market trial and transmit an ATSC 3.0 signal as guest station of the Host facility for the duration of the experiment. Licensee will continue to transmit a ATSC 1.0 signal over its currently licensed facility⁵ and Licensee would retain its PSIP Channel 10.1 designation for both the ATSC 1.0 stream and the ATSC 3.0 stream. Licensee has entered into an agreement with the Host, which complies with all of the Commission’s requirements,⁶ and Licensee will provide a copy upon request by the Commission.

In order to accommodate the eight broadcast companies that will applying for authorization to test over the next several months (Univision, Fox, Telemundo, PBS, Scripps, Nexstar, Meredith, and TEGNA), additional flexibility is critical. Because of spectrum capacity restraints, it will be necessary to rotate licensees on and off as transmission, video quality, audio quality, interactive and enhanced content, applications and mobile and auto transmissions tests

² It is our understanding based on informal conversations with the FCC staff that although OMB has approved the forms, the applications in the LMS system may not be available until the end of the year.

³ Letter from Barbara A. Kreisman, Federal Communications Commission to Christopher G. Wood, Unimas Partnership of Phoenix, March 29, 2018, File No. 0000048971 (“*KFPH-CD Authorization Letter*”).

⁴ *Id.* at 3.

⁵ Because Licensee is not moving its ATSC 1.0 facilities, no MVPD notifications were required.

⁶ *See* 47 C.F.R. § 73.3801(e).

are conducted. The nature of the effort as market trial, under the Commission's experimental rules, supports such flexibility. The process is very iterative and the multiple transmission and receiver partners are in various stages of development. The Phoenix test market partners are hoping to complete testing by the end of the Host's Authorization in order to bring receiver development time frames to 2020 retail launch. A dynamic and flexible test environment that has the ability to rapidly test multiple use cases at once will best serve licensees, the consumer electronics industry and consumers.

As detailed in the Engineering Statement attached to this application, Licensee is not proposing to make any changes to its ATSC 1.0 transmitter location, antenna height, antenna pattern or effective radiated power. The Licensee and the Host are both licensed to the city of Phoenix and are within the Phoenix (Prescott) DMA, thereby satisfying the ATSC 3.0 coverage requirements.⁷

For the reasons set forth herein, Licensee requests that the Commission promptly authorize ATSC 3.0 guest operations for KSAZ-TV at the Host transmission site. An Experimental Authorization will serve the public interest by helping to advance the technical capabilities of over-the-air television, while preserving viewers' access to the ATSC 1.0 signal.

⁷ See 47 C.F.R. §73.3801(d).