

**EXPERIMENTAL AUTHORIZATION
KSTR-DT (FACILITY ID No. 60534)
NARRATIVE
NEXT GEN TV DEPLOYMENT
DALLAS, TEXAS**

UniMás Dallas LLC (“**UniMás**”), pursuant to 47 C.F.R. §§ 5.201, 5.601 and 5.602 (as applicable), respectfully requests that the Commission grant Experimental Authorizations to allow KSTR-DT, Irving, TX (“**KSTR**”) to commence ATSC 3.0 operations at its current site beginning March 1, 2019 as a “lighthouse” station in the initial phase deployment for next-generation television broadcasting in the Dallas-Ft. Worth Designated Market Area (“**DMA**”).¹ Experimental Authorizations are required because the Commission has not yet finalized the forms required for authorization for stations to commence ATSC 3.0 operations.²

The Commission and broadcasters have contemplated an advanced transmission standard for the broadcast platform ever since the initial digital standard was approved over 20 years ago.³ The new ATSC 3.0 standard, developed over the past five years, should enhance the relationship between broadcasters and the public they serve in fundamental ways, including a convergence with all other modern communication devices using the Internet Protocol and a modulation scheme better suited to mobile reception. The number of enhanced and new services enabled by the ATSC 3.0 standard combined with the deployment of single frequency networks is expected to improve television viewing dramatically, allow for hyper-localized programming, permit profound improvements in emergency notifications and allow for multiple data delivery businesses.

Without an additional channel to facilitate deployment of the new standard, the Commission has adopted a voluntary deployment plan involving simulcasting and channel sharing as the mechanism for the introduction of and conversion to the new transmission paradigm. Broadcasters in the Dallas DMA have targeted that market for initial phase deployment of the new standard’s capabilities. As demonstrated below, there is good cause in these circumstances to grant the Experimental Authorizations to permit KSTR to commence ATSC 3.0 operations on March 1, 2019 as the market’s “lighthouse” station for next-generation television. ATSC 3.0 operation in Dallas will allow broadcasters as well as industry partners to (1) test core television service and 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**”); and (3) deploy and test a single frequency network (“**SFN**”) transmission system (described below).

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.

² See Letter from Barbara A. Kreisman, Chief, Video Division, Media Bureau, Federal Communications Commission, to Christopher G. Wood, UniMás Partnership of Phoenix, March 29, 2018, File No. 0000048791. It is our understanding based on informal conversations with the FCC staff that, although the Office of Management and Budget has approved the forms, the applications in the LMS system may not be available for several weeks.

³ See *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Fourth Report and Order, MM Docket No. 87-268, 11 FCC Rcd 17771 ¶ 49 (1996).

Next Gen TV Deployment

The initial phase Next Gen TV deployment in Dallas will involve three licensed UHF broadcast stations. KSTR has agreed to implement the ATSC 3.0 platform and act as a “lighthouse” or ATSC 3.0 “Host” facility for a period of two years (subject to FCC authorization), while the remaining two stations will act as ATSC 1.0 “Host” facilities. The attached figures reflect the current and transition program carriage of each station. All of the program streams being transmitted in ATSC 1.0 on KSTR as of the date of this application will continued to be transmitted in ATSC 1.0 format on other stations serving substantially the same coverage areas. There will be little, if any, disruption to KSTR’s ATSC 1.0 viewers. As set forth in the Commission’s Report and Order, KSTR’s 1.0, ATSC simulcast signal will be substantially similar as that of its ATSC 3.0 signal. Both KSTR and KUVN are inside the DMA, thereby satisfying the ATSC 3.0 coverage requirements. *See* 47 C.F.R. §73.3801(d).

The respective station descriptions and Next Gen TV deployment actions for each are described below:

KSTR-DT, Irving, Texas

KSTR, RF Channel 48 (virtual Channel 49) (Facility ID No. 60534), is affiliated with the UniMás Network. It is one of two full power stations in the Dallas DMA licensed to subsidiaries of Univision Communications, Inc. The other is KUVN-DT, Garland, TX (RF Channel 23) (Facility ID No. 35841) (“**KUVN**”). These two stations share studio facilities located on Bryan Street in downtown Dallas. KSTR maintains transmitter technical facilities located south of Belt Line Road in Cedar Hill. The coverage areas of these two stations are substantially similar, as shown on the attached signal coverage maps, and cover the community of licenses.

The following is the population and coverage as shown on the attached coverage map (.pdf labeled KUVN-DT and KSTR-DT):

Contour Population (2015 U.S. Census Data)

KSTR Noise-Limited Contour: 7,296,291

KSTR Coverage within KUVN Noise-Limited Contour: 7,288,829

Population Inside Both Contours: 7,220,674

KSTR Loss Area Population: 7,462

Note: KUVN Covers **99.9%** of Population Within KSTR

Noise-Limited Contour as defined by 47 CFR § 73.3801(f)(6)(ii).

KSTR is scheduled to move to RF Channel 34 in Phase 3 of the Incentive Auction Repack Implementation Plan with testing to commence on April 13, 2019. Channel 48 spans the C and D wireless frequency blocks, both of which were purchased in the Incentive Auction by AT&T Spectrum Holdings.

KSTR-DT currently broadcasts three program streams – one primary and two substreams:

- UniMás – HD (1080i)
- Grit – SD (480i)
- getTV – SD (480i)

UniMás. As part of the Next Gen TV initial phase deployment plan, KSTR has agreed to operate its transmission platform in ATSC 3.0 for a period of two years. While doing so, it will continue to broadcast its primary UniMás stream in ATSC 1.0 on sister station KUVN, using that stream’s current call sign and virtual channel 49.1.

getTV. The getTV digital substream will be relocated to KTXD-TV (Facility ID No. 42359), (“**KTXD**”) licensed to KTXD License Company, LLC, wholly-owned by Cunningham Broadcasting Corporation, where it will be transmitted using its current call sign and virtual channel 49.2.

Grit. The Grit digital substream will be relocated to KUVN, where it will be transmitted using its current call sign and virtual channel 49.3. To create capacity for Grit to be hosted on KUVN, one digital substream, Laff, currently being transmitted on KUVN will be relocated to KTXD, where it will be transmitted using its current call sign and virtual channel, 23.4.

We have also attached pre-and post “repack” maps that show the coverage areas and populations for KTSR and KTXD.

In addition to transmitting its current programming using the ATSC 3.0 transmission platform, KSTR also may act as an ATSC 3.0 “Host” facility for the Univision main stream programming currently carried on KUVN.

As a result of the deployment, KSTR initially will broadcast up to two ATSC 3.0 program streams:

- UniMás – HD (720p minimum)
- Univision – HD (720p minimum) – From KUVN

These program streams may change as circumstances warrant, and KSTR is committed to providing the Commission written notice of any changes.

On November 16, 2018, Univision sent notifications to the multichannel video programming distributors (“MVPDs”) in the market. Univision is committed to providing MVPDs that carry KSTR 1.0 a good quality signal during the Experimental Authorization and will take reasonable steps to ensure MVPD subscribers do not lose access to the KSTR 1.0 signal during the test period.

KUVN-DT, Garland, Texas

KUVN, Garland, Texas, virtual and UHF digital Channel 23, is affiliated with the Univision Network and licensed to KUVN License Partnership, L.P., a subsidiary of Univision Communications. As noted above, KUVN and KSTR share studio facilities located on Bryan Street in downtown Dallas. KUVN maintains transmitter technical facilities located south of Belt Line Road in Cedar Hill. The station's signal is relayed on Class A low-power station KUVN-CD (RF Channel 47) in Fort Worth. The station is scheduled to move to

Channel 33 in Phase 3 of the Incentive Auction Repack Implementation Plan with testing to commence on April 13, 2019.

KUVN currently broadcasts four program channels – one primary and three substreams:

- Univision – HD (720p)
- Bounce – SD (480i)
- Escape – SD (480i)
- Laff – SD (480i)

KUVN will act as an ATSC 1.0 “Host” facility for the required primary simulcast programming of KSTR, UniMás HD. In so doing, it will continue to broadcast three of its four program streams in ATSC 1.0 along with the KSTR simulcast (which will air on virtual channel 49.1) and Grit from its sister station, KSTR.

Subsequent to the deployment, KUVN will broadcast five program streams:

- Univision – HD (720p)
- UniMás – HD (720p) – From KSTR
- Bounce – SD (480i)
- Escape – SD (480i)
- Grit – (480i) – From KSTR

KUVN may also simulcast its primary program stream on KSTR using ATSC 3.0.

KTXD-TV, Greenville, Texas

KTXD-TV, RF Channel 46 (virtual channel 47) (“**KTXD**”), is an independent television station licensed to Greenville, Texas. The station is licensed to KTXD License Company, LLC, wholly-owned by Cunningham Broadcasting Corporation. KTXD’s studios are located on Dallas Parkway (west of the Dallas North Tollway) in Addison, and its transmitter technical facilities are located south of Belt Line Road in Cedar Hill. The signal coverage map for KTXD is attached hereto. The station is scheduled to move to Channel 23 in Phase 3 of the Incentive Auction Repack Implementation Plan with testing to commence on April 13, 2019.

KTXD currently broadcasts five program streams – one primary and four substreams:

- Stadium – HD (720p)
- Comet TV – SD (480i)
- TBD – SD (480i)
- Charge! – SD (480i)
- SonLife – (SD (480i)

KTXD has agreed to act as an ATSC 1.0 “Host” facility for one ATSC 1.0 programming stream of both KSTR and KUVN during the period in which KSTR operates in ATSC 3.0: getTV, virtual channel 49.2 from KSTR and Laff, virtual channel 23.4 from KUVN. In so doing, it will continue to broadcast its current program streams in ATSC 1.0 except for Charge!. (Viewers in Dallas, however, will not lose access to Charge! since the station will continue to be carried in the market

on KDAF, Channel 32.) Subsequent to the deployment, KTXD will broadcast six program streams – one HD and five multicast SD:

- Stadium – HD (720p)
- Comet TV – SD (480i)
- TBD – SD (480i)
- SonLife – SD (480i)
- Laff SD (480i) – From KUVN
- getTV SD (480i) – From KSTR

Predicted Population Coverage Gain/Loss

Pursuant to ¶53 of the Report & Order and §73.3801 (f)(6) of the Rules, attached hereto are coverage maps showing predicted population within the noise limited service contours for each of the stations involved in the Dallas Next Gen TV deployment including gain and loss areas. Each of the applications would qualify as a “checklist” application eligible for expedited processing.

Notice Requirements

Pursuant to §73.3801(g) of the Rules, the Stations will undertake to provide consumer education to viewers receiving over-the-air signals where programming will move from one transmission facility to another. Public Service Announcements will air daily for 30 days prior commencement of the deployment plan. UniMás has experience in providing such notice in connection with the Phoenix, AZ ATSC 3.0 test.

In preparation for the March 1, 2019 launch, stations participating in the Experimental Authorization are actively coordinating with the MVPDs in advance of the launch. KSTR will continue to deliver a good quality signal to the local receive facilities of each of the affected MVPDs. For the convenience of viewers as well as MVPDs, the stations will continue to use the same call sign and virtual channel numbers.

Single Frequency Network

In conjunction with the ATSC 3.0 Experimental Authorization for ATSC 3.0 transmission by KSTR (RF Channel 48), the parties intend to construct and operate a three-tower, Single Frequency Network (“SFN”) array pursuant to the Distributed Transmission System (“DTS”) requirements embodied in §73.626 of the Rules. The SFN locations are in Denton, Garland and Ft. Worth and more specifically identified in the Engineering Statement. Each SFN tower site will be capable of transmitting six separate channels, but for this phase of the Dallas ATSC 3.0 deployment only one channel will be broadcast (RF Channel 48). The Report & Order notes that the existing DTS rules are adequate to provide authorizations for SFN deployment.⁴ Pursuant to §73.626(f), an application proposing use of a DTS will not be accepted for filing unless it meets the specified conditions referenced in the subsection. The Engineering Statement provides the required information for each of the SFN transmitter location sites. Figure 3 graphically illustrates the SFN location sites and coverage contours.

⁴ Report & Order at ¶118.

For the reasons set forth herein, KSTR requests that the Commission promptly authorize the station to transmit in ATSC 3.0. Experimental Authorizations 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.

Figure 1

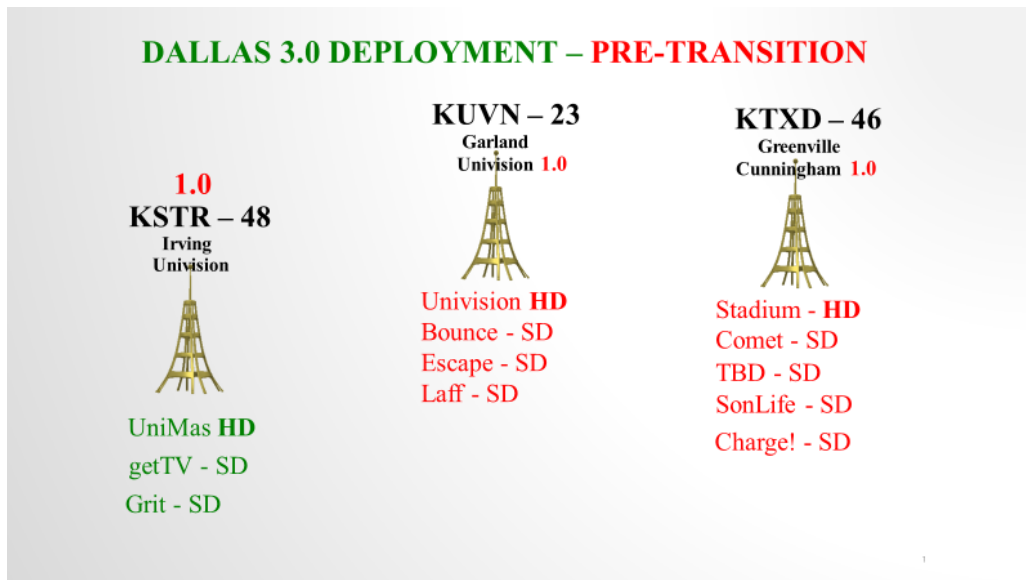


Figure 2

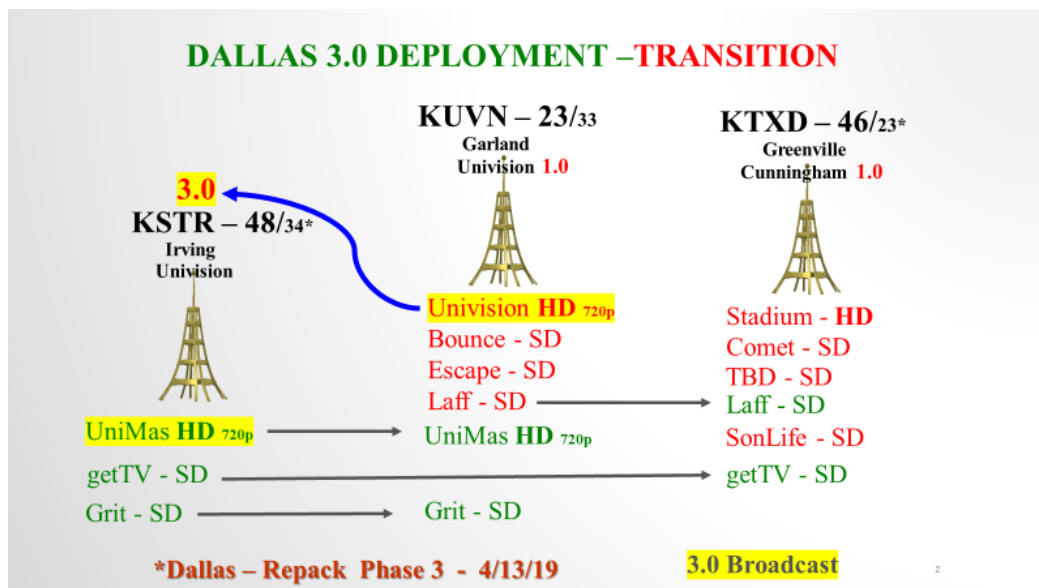


Figure 3

