

Statement in Support of Renewal of Experimental Authorization for KFPH-CD ATSC 3.0 Operations

Unimas Partnership of Phoenix (“Licensee”), licensee of Class A television station KFPH-CD, Phoenix, AZ (Facility ID 2739) (the “Station”) pursuant to 47 C.F.R. §§ 5.201, 5.601 and 5.602 (as applicable), respectfully requests that the Commission respectfully requests that the Commission grant renewal of its Experimental Authorization (File No. 0000048791) to allow for the continuation of testing of ATSC 3.0 operations on RF channel 35 in Phoenix, Arizona. As demonstrated below, there is good cause to grant renewal of this Experimental Authorization to continue testing “Next-Generation Television” in the Phoenix Market Trial.

The Station’s ATSC 3.0 Experimental Authorization was granted on March 29, 2018, and has involved several stations, including KAET, KNVX-TV, KPNX, KPHO-TV, KSAZ-TV, and KTVK, each of which has applied for its own experimental authority pursuant to the conditions set forth in the March 29, 2018 grant. To date, the tests conducted have been focused on four broad areas:

- First, participants have been working closely with broadcast equipment manufacturers, helping them to develop and test over-the-air their latest designs, which also must incorporate the changes still being made in the ATSC 3.0 standard.
- Second, participants’ over-the-air signals have assisted consumer receiver manufacturers in their efforts to test their prototype designs to improve their performance while perfecting ATSC 3.0’s most useful features. This work has helped the industry move toward a final service concept for ATSC 3.0 that can be implemented in retail distribution of receivers.
- Third, as Phoenix Market Trial stations have received their experimental authorizations and been added to the main transmission, participants have established that the “Lighthouse” multiple service delivery concept, as tested in the field, provides a viable means of service transition in many markets.
- Finally, consumer lab testing has been conducted in conjunction with the Phoenix Market Trial project partners and the Pearl TV broadcast business group. A copy of the consumer study findings (Jan. 23, 2019) is attached.

Moving forward, there is still a substantial amount of critical testing needed, including additional testing that focuses on the development of the basic television service for consumers, both for fixed services (in the home) and for mobile services (e.g., auto). Areas of continued development include (1) securing the signal from hacking; (2) reducing channel change time as well as other improvements in broadcast equipment and receiver performance; (3) additional

transport functionality; (4) providing a mechanism for conformance and broadcast equipment inter-operation; and (5) the creation of test streams for use in future equipment design. Testing will also include the viability of broadcaster application and non-real time file delivery.

The Phoenix Market Trial continues to provide an open test bed for industry innovation as more and more broadcast equipment and receiver manufacturers want to develop new ATSC 3.0 products. Participating stations also are closely working with multichannel video programming distributors (MVPDs) to identify what a transition to the “Next Generation” TV standard will mean to them. MVPD leaders have indicated they would like to use the Phoenix Market Trial as their testing location.

The Licensee therefore respectfully requests a six (6) month extension of its Experimental Authorization so that it and its numerous partners can continue testing and evaluating ATSC 3.0. The grant of this extension will have no negative impact on the post-Incentive Auction “repack” as the Phoenix market has already transitioned. The public interest is clearly served by allowing the continued refinement of ATSC 3.0 transmissions for both fixed and mobile services, as well as appropriate testing to ensure ATSC 3.0 can best take advantage of both over-the-air and broadband technologies. Because improved services will attract consumers, MVPDs and the consumer electronics industry to the ATSC 3.0 standard, continued robust testing is both appropriate and necessary.