

Narrative Statement
KUPN Licensee, LLC
Request for Media Bureau 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 further experimental testing using full-power DTV facilities in order to test, evaluate, and demonstrate to the public ATSC 3.0 technologies for the benefit of the television industry and the public. Specifically, the applicant is proposing to broadcast the Channel 33 signal in the Las Vegas market, using an existing antenna that has been previously used for demonstration purposes on multiple and approved experimental occasions by licensed station KSNV(TV), Las Vegas, Nevada.

The applicant intends to utilize the channel requested in the STA to support demonstrations of ATSC 3.0 capabilities and use cases by a variety of companies at the upcoming Consumer Electronics Show **January 7-10, 2020**, in Las Vegas. The applicant plans to use the standard to demonstrate ATSC 3.0’s capabilities to many different entities and many different types of users – e.g., equipment manufacturers, content providers, international visitors – who have expressed interest in ATSC 3.0. In addition, the requested STA will be used to test the latest ATSC 3.0 technologies and standards and will permit a comparison to the current operational standard. 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 Show* to ensure successful demonstrations.

CE manufacturers have committed to 2020 launch dates for "NextGenTV" labeled sets, with broad cross-industry support of the new certification and labeling effort. This request is made to help facilitate the Broadcasting support side of the industry's objectives. Both programming and technologies are being aligned for anticipated commercial migrations to "NextGenTV" services in this (Las Vegas) and other markets throughout the coming year. This request is made to accommodate this broad industry activity.

The applicant hereby respectfully requests expedited Media Bureau approval of the STA for a period from **December 20, 2019 until January 20, 2020.**

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 shown in the Engineering Statement, the applicant is seeking additional approval for authority to operate at an ERP of 42 kW small cell in order to minimize any potential interference to other devices or stations. K33MJ-D is currently licensed as a secondary facility LPTV facility on channel 33, which is licensed to Pahrump, Nevada. The licensee, Sinclair Media II, Inc. has agreed to accept the predicted interference from the requested STA facility to 74.81% of the

population predicted to receive service from the K33MJ-D licensed facility during the pendency of the requested STA.

The applicant submits that a grant of the instant STA 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, television licensees, and many different use cases going forward.