WatchTV, Inc. FRN 0020-4975-90
KORS-CD, Portland, OR Facility ID 71069

ADDITIONAL INFORMATION IN SUPPORT OF APPLICATION FOR ATSC 3.0 AUTHORITY WITH STREAMLINED AND EXPEDITED PROCESSING

By this application, WatchTV, Inc. ("WatchTV) proposes to convert the transmitted signal of Class A television station KORS-CD from the ATSC 1.0 format to the ATSC 3.0 format.

Simulcasting of KORS-CD's programming in ATSC 1.0 format will take place on KORK-CD, Facility ID 71079, RF Channel 35, Virtual Channel 35, on multicast stream Channel 35.3. KORK-CD is licensed to the same community in the same DMA (Portland) as KORS-CD. Duplication of ATSC 1.0 and ATSC 3.0 content will be 100% at the start. Later, some ATSC 3.0 enhanced capabilities may be introduced within the categories permitted by Rule 73.6029(b)(1). The simulcasting will remain substantially similar as required by the rule.

No change is proposed in the channel or any of the authorized licensed technical parameters for KORS-CD, including transmitter location, except for a change in the signal format. Accordingly, no increased interference will be caused to any other station, and no area or population will lose service from KORS-CD.

A construction permit is not required for ATSC format conversion with no change in licensed parameters. ATSC 3.0 authority may be granted directly upon an application for modification of license. Both streamlined and expediting processing are appropriate, pursuant to Rules 72.6029(f)(3) and (5).

There will also be no loss of ATSC 1.0 service to the public. KORK-CD transmits from the same physical location as KORS-CD, through the same shared nondirectional antenna, and with the same effective radiated power (15 kW). Therefore, the ATSC 1.0 coverage on KORK-CD will be the same as the ATSC 3.0 coverage on KORS-CD, apart from any possible anomalies resulting from the different wavelength of the signal and any incoming interference from other stations.

KORS-CD and host KORK-CD are both licensed to WatchTV. Therefore KORS-CD has full permission for simulcasting; and the licensee has full control over access, operation and maintenance, transitioning programming from one station to the other, financial arrangements, and notices to viewers. There is no written sharing agreement, because such an agreement would serve no purpose when both parties are the same entity. The KORK-CD multicast stream allocated to KORS-CD will have a fixed bit rate of 4.5 Mb/sec, which is adequate for a standard definition 480p digital signal.

Since the ATSC 3.0 station and the ATSC 1.0 host are both licensed to the same entity, that entity already bears full licensee responsibility for the operation of both stations. Under those circumstances, there appears to be no reason to modify the license of either station to implement "shared" status. Shared status is a way to allocate licensee responsibility between two separately owned users of a single channel. No allocation is needed here, because WatchTV bears full responsibility for both stations. In the event that Section 73.6029 of the Rules is interpreted to require formal shared status, with a separate sharing application filed by KORK-CD, it is requested that the license modification requirement for KORK-CD be waived.

KORS-CD will broadcast public service announcements or crawls for 30 days prior to terminating operation in the ATSC 1.0 format, as required by Rule 73.6029(g).

The application states that KORS-CD will comply with the MVPD notification requirements of Rule 73.2069(h). However, the station is not carried by any MVPD, so compliance with that rule section will be achieved without giving notice to any MVPD.