

47 C.F.R. § 73.3801(f) Exhibit

Raleigh (WRDC-TV) Licensee, Inc., licensee of WRDC(TV), Durham, NC (Facility ID 54963; RF Channel 14) (“Applicant”), proposes simulcasting WRDC(TV)’s primary stream (affiliated with MyNetwork) in ATSC 1.0 format on commonly owned WLFL(TV), Raleigh, NC (Facility ID 73205; RF Channel 18). As shown in the attached engineering exhibit, the service contour of WLFL(TV)’s facility covers 94.6% of the predicted population within the noise limited service contour of WRDC(TV)’s post-repack facility, which is 0.4% shy of the 95% threshold established in Section 73.3801 of the Commission’s rules for expedited processing. Applicant therefore submits this exhibit pursuant to Section 73.3801(f)(6)(iii) to demonstrate that grant of the hosting arrangement with WLFL(TV) will serve the public interest.

There are no other viable host stations in the market that would result in less service loss to existing viewers than WLFL(TV). WTVD(TV) currently airs two HD streams and an SD stream, and therefore would not have the capacity to host WRDC(TV)’s stream without reducing the bitrate of WRDC(TV)’s stream or one of WTVD(TV)’s current HD streams to SD quality (and potentially dropping its existing SD stream). WRDC(TV) has contractual obligations requiring it to air its primary programming stream in ATSC 1.0 format in HD, and the Commission has also encouraged broadcasters participating in the ATSC 3.0 transition that are currently transmitting in HD to find a way to continue to provide an HD signal to ATSC 1.0 viewers.¹ WUVC(TV) is similarly capacity-constrained and has a service contour that covers less of the predicted population within WRDC(TV)’s current ATSC 1.0 signal than WLFL(TV) does. Although WNCN(TV) does not face the same capacity constraints and its service contour would technically cover approximately 96% of the predicted population within WRDC(TV)’s current contour, WNCN(TV) is a low VHF station and therefore would not actually be expected to minimize the loss of service to WRDC(TV)’s existing over-the-air viewers. A hosting arrangement with WNCN(TV) would also be less efficient than a hosting arrangement between commonly owned WRDC(TV) and WLFL(TV), as it would require the drafting and negotiation of an additional hosting agreement without yielding any meaningful benefit to consumers. Other broadcasters either declined to participate in the ATSC 3.0 transition plan or have service contours that would have resulted in greater service loss to existing viewers.

Because the proposed hosting arrangement with WLFL(TV) results in a population loss area that exceeds the Commission’s 5% loss standard for expedited processing by a mere 0.4%, the vast majority of WRDC(TV)’s current over-the-air viewers will continue to have access to WRDC(TV)’s primary programming in ATSC 1.0 format from WLFL(TV)’s facilities. The Raleigh-Durham DMA also has a cable/satellite penetration rate of approximately 80% of television households, and MVPD subscribers will be unaffected by the relocation of WRDC(TV)’s primary stream to WLFL(TV). Further, as shown in the attached engineering exhibit, a significant portion of the predicted loss area population is in Greensboro, NC, and therefore falls outside of the Raleigh-Durham DMA. Viewers in that adjacent DMA will continue

¹ *Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard*, Report and Order and Notice of Proposed Rulemaking, 32 FCC Rcd 9930, 9945 (2017).

to be served by commonly owned WMYV(TV), the MyNetwork affiliate licensed to Greensboro, NC.

The proposed simulcasting arrangement with WLFL(TV) will serve the public interest, as it will advance the Commission's ATSC 3.0 policy goals while enabling WRDC(TV) to continue to provide an HD quality ATSC 1.0 signal to nearly 95% of the predicted population within its current service contour. Deployment of ATSC 3.0 service will unlock the potential for consumers to benefit from innovative features made possible by the ATSC 3.0 technology, such as advanced emergency alerting and information functions, enhanced video featuring High Dynamic Range, Wide Color Gamut and High Frame Rate, immersive and multiple audio channels, and interactive data services. These public interest benefits of deploying ATSC 3.0 service in the Raleigh-Durham DMA outweigh any minimal harm resulting from ATSC 1.0 coverage loss, particularly since the majority of the population loss area is located outside of WRDC(TV)'s DMA, and viewers in the adjacent Greensboro-Winston Salem DMA that lose access WRDC(TV)'s MyNetwork programming in ATSC 1.0 will continue to be served by the MyNetwork station licensed to that DMA.