

Request for Special Temporary Authority (Reduced Power)

TEGNA Inc. ("TEGNA"), on behalf of its subsidiary KONG-TV, Inc. ("Licensee"), licensee of television station KONG, Everett, Washington ("KONG"), hereby requests Special Temporary Authority to operate at reduced power after KONG converts its broadcast transmission to the Next Gen Television (ATSC 3.0) standard, which Licensee intends to commence on December 8, 2020.¹ It is necessary for KONG to operate at reduced power until it can obtain and install a replacement antenna capable of handling Next Gen Television signals at KONG's full licensed power.

Subject to the Commission's authorization for KONG to convert to Next Gen Television operation, KONG will broadcast, via its Next Gen Television facilities, its own independent primary channel, the NBC-affiliated primary channel of its sister station KING-TV, Seattle, Washington ("KING"),² and the primary channels of FOX affiliate KCPQ, Tacoma, Washington ("KCPQ") (Facility ID 33894) and MyNetwork affiliate KZJO, Seattle, Washington ("KZJO") (Facility ID 69571), both licensed to Fox Television Stations, LLC ("Fox"). Licensee has engaged in extensive technical preparations to enable KONG to begin Next Gen Television service, including by replacing the station's transmitter. During planning for KONG's transition, Licensee determined, in consultation with the manufacturer of the station's antenna, that no modification or replacement of the station's existing antenna would be needed to convert to Next Gen Television operation. However, late in the transition planning process, the antenna manufacturer informed Licensee that, based on further analysis, the existing antenna in fact cannot transmit KONG's Next Gen Television signal at full licensed power because the coupler to inner spacing in the bottom section of the antenna was not designed to handle the higher peak to average power ratio, reducing the power input capacity of the antenna for ATSC 3.0 use.

To address this issue, KONG intends to launch its Next Gen Television service at a maximum ERP of 387 kW, which is about 57 percent of the station's licensed ERP of 679 kW. As shown on Attachment 1, KONG's reduced-power operation will continue to fully cover its community of license and about 98.7 percent of the population that would be covered at KONG's licensed power. In addition, in accordance with the Commission's Next Gen Television rules, KONG has arranged for its primary stream to be hosted in ATSC 1.0 format on KING and for its multicast streams to be hosted in ATSC 1.0 format on KCPQ and KZJO, ensuring that KONG's current viewers will continue to have over-the-air access to the station's programming.³

Licensee has identified an appropriate replacement antenna that will allow KONG to offer Next Gen Television service at its full licensed power and is in the process of ordering the new antenna and arranging for its installation.

Grant of the authority requested herein is in the public interest because it will allow KONG, KING, and the Fox stations to begin offering Next Gen Television service to the Seattle market immediately, thus allowing the stations to gain experience with the standard and its advanced features, while having no effect on any viewer's access to the stations' existing programming in ATSC 1.0 format.

¹ See File No. 0000127044 (license modification application).

² KING is licensed to King Broadcasting Company, also a subsidiary of TEGNA.

³ See File Nos. 0000127044 (KONG license modification application), 0000127063 (KONG request for legal STA), and 0000127843 (KING license modification application).

Attachment 1

