

Request for Extension of Special Temporary Authority

Raleigh (WRDC-TV) Licensee, Inc. (“Licensee”), licensee of WRDC(TV), Raleigh, NC (Facility ID 54963), hereby requests an extension of the Special Temporary Authority (“STA”) that was granted on November 16, 2020 in connection with WRDC(TV)’s launch of ATSC 3.0 broadcast service. *See* File No. 0000125063. On November 17, 2020, Licensee commenced ATSC 3.0 operations from WRDC(TV)’s facility, which serves as the ATSC 3.0 host for stations in the Raleigh market, and began simulcasting its primary stream in ATSC 1.0 format on commonly owned WLFL(TV), Raleigh, NC (Facility ID 73205), pursuant to its Next Generation license. (File No. 0000125503). Additionally, Licensee began broadcasting its multicast stream affiliated with the Charge! network from the facilities of WNCN(TV), Goldsboro, NC (Facility ID 50782), and broadcasting its multicast stream affiliated with the Comet TV network using the facilities of WTVD(TV), Durham, NC (Facility ID 8617), pursuant to the November 16, 2020 STA and written hosting agreements with Nexstar Broadcasting, Inc. and ABC, Inc. (parent company to WTVD Television, LLC), respectively.¹ This request seeks an extension of STA to allow WRDC(TV) to continue the multicast hosting arrangements with WNCN(TV) and WTVD(TV) for the broadcast of its multicast streams from their facilities in ATSC 1.0 format.

As explained in Licensee’s original request for STA, WRDC(TV) is not able to air its multicast streams on WLFL(TV), its primary ATSC 1.0 simulcast host, due to ATSC 1.0 capacity constraints. Furthermore, due to ATSC 3.0 capacity and other constraints attendant with the multi-station and multi-market coordination needed for a successful ATSC 3.0 deployment across the country, it is not feasible for Licensee to simulcast WRDC(TV)’s multicast streams in an ATSC 3.0 format without unduly minimizing, if not largely eliminating, the benefits to the public and the participating stations of transitioning to ATSC 3.0. Absent an extension of STA authorizing WRDC(TV) to air its multicast streams using the facilities of WNCN(TV) and WTVD(TV), all over-the-air viewers would lose access to an ATSC 1.0 signal of WRDC(TV)’s multicast streams.

As such, Licensee respectfully requests an extension of the STA. Grant of this STA extension would serve the public interest because it would advance the Commission’s ATSC 3.0 policy goals while preserving WRDC(TV)’s ability to air each of its programming streams in ATSC 1.0 and ensure access to the programming currently received for most over-the-air viewers. It will also continue to make clear that WRDC(TV) is an authorized user of a portion of WNCN(TV)’s and WTVD(TV)’s channel and is the party responsible for ensuring compliance with the Communications Act and the Commission’s rules and regulations.

¹ Licensee notes that, in response to the Media Bureau’s request that NextGen licensees formally seek modification or clarification of the Commission’s existing rules prior to seeking renewal of STAs relating to such multicast hosting arrangements, the National Association of Broadcasters filed a Petition for Declaratory Ruling and Petition for Rulemaking in GN Docket No. 16-142 on November 9, 2020.