

Tribune Media Company
WTTK(TV), Kokomo, IN
(Fac. ID 56526)

**Request for Special Temporary
Authority**

Tribune Media Company (“Licensee”), licensee of WTTK(TV), Kokomo, Indiana, RF Channel 15 (Fac. ID 56526) (“WTTK”), hereby requests Special Temporary Authority in connection with the transition of WTTK’s transition to the ATSC 3.0 broadcast transmission standard and related proposal to broadcast WXSP’s non-primary programming streams (“multicast streams”) in ATSC 1.0 format as follows: 15.2 Independent programming and 15.3 COZI TV programming to WRTV(TV), Indianapolis, Indiana, RF Channel 25 (Fac ID 40877), licensed to Scripps Broadcasting Holdings, LLC.

Licensee requests that for purposes of enforcement and application of its rules, WTTK be treated as if it is airing the multicast streams over WTTK and be the responsible party under the Act and Commission rules and regulations akin to the manner that the Commission treats ATSC 1.0 primary simulcast streams under the Next Gen TV rules.

As indicated in Licensee’s WTTK’s Form 2100 application, Licensee proposes to (1) commence ATSC 3.0 operations from the current WTTK facilities and (2) simulcast the 15.1 primary stream CBS programming to commonly owned station WXIN(TV), Indianapolis, Indiana (FAC ID 146). To minimize the loss of over-the-air programming to its current ATSC 1.0 viewers resulting from the station’s transition to ATSC 3.0, Licensee proposes to broadcast its multicast streams on WRTV pursuant to hosting agreements.

Because of ATSC 1.0 capacity constraints, WTTK is not able to air its multicast streams on WXIN(TV) , its primary ATSC 1.0 simulcast host. 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 WTTK’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. Simulcasting those streams in ATSC 3.0 would reduce capacity available to NextGen stations for offering consumers the improved services that ATSC 3.0 enables. The types of services and improvements that would be precluded would include enhanced video featuring High Dynamic Range, Wide Color Gamut and High Frame Rate, immersive and multiple audio channels using Dolby AC-4, Advanced Emergency Alerting and Information functions as part of a broadcast receiver application, and non-real time interactive data delivery. Each of these requires a portion of the ATSC 3.0 capacity that would be unavailable were Licensee to carry multicast program streams as the ATSC 3.0 lighthouse. Even setting aside these impediments, significant additional engineering work and more equipment would be required to simulcast KPLR’s multicast streams in ATSC 3.0 and ATSC 1.0 formats. Obtaining, installing and testing that equipment would, at minimum, delay rollout of ATSC 3.0 in the Indianapolis, Indiana market.

The hosting arrangements with WRTV will serve the public interest by enabling most

current over-the-air viewers to continue to have access to WTTK's multicast streams. Absent the arrangement with WRTV, all over-the-air viewers would lose access to KPLR's multicast streams. Licensee has coordinated or will coordinate with any MVPDs that carry WTTK's multicast streams to confirm they will continue to receive a good quality signal of such streams from WRTV, either over-the-air or alternative delivery methods, including but not limited to direct fiber feed.

Although Licensee has agreed to indemnify the licensee of WRTTV from and against all liabilities or claims resulting from or arising out of the programming and advertising broadcast on Licensee's program streams using the facilities of WRTV, Licensee is requesting the instant authorization to make clear that Licensee will remain responsible for the Independent and COZI TV streams' compliance with the Communications Act and the Commission's rules and regulations. To alleviate any viewer confusion, Licensee is airing notices to over-the-air viewers of WTTK that it intends to discontinue ATSC 1.0 operations and begin broadcasting in the NextGen TV standard on WTTK beginning August 10, 2021, and to instruct all over-the-air viewers to tune to Channel 29 (PSIP channel for WTTK) to continue receiving the programming in the ATSC 1.0 standard. We also note that Licensee does not currently, and does not intend to, rely on its multicast streams for compliance with the Commission's Children's Television Programming requirements, as WTTK averages at least three hours per week of core programming on its primary stream. As such, neither WTTK's compliance with the Commission's Children's Television Programming requirements nor viewers' access to the station's required core programming will be affected by deviations in coverage (as shown in the engineering exhibit included with the application) resulting from the relocation of WTTK's multicast signals to the WRTV facilities as described herein. Licensee provided notice to the relevant MVPDs of its proposed multicast ATSC 1.0 signal relocations when it provided the requisite notice regarding relocation of WTTK's primary stream ATSC 1.0 signal. As noted Licensee has also aired and will do what is legally required as to further airing of WTTK consumer notices regarding the station's transition to the ATSC 3.0 standard and the need for over-the-air viewers to rescan for the planned August 10, 2021 transition date.

Grant of this STA request will serve the public interest, as it will advance the Commission's ATSC 3.0 policy goals while preserving WTTK's ability to air each of its programming streams in the ATSC 1.0 format to ensure that most of WTTK's current viewers can continue to receive the programming currently available to them. It will also make clear that WTTK is an authorized user of a portion of the channels for WRTV and is the party responsible for ensuring compliance with the Communications Act and the Commission's rules and regulations.