

Request for Special Temporary Authority

Meredith Corporation (“Meredith”), licensee of KSMO-TV, Kansas City, Missouri, hereby requests Special Temporary Authority (“STA”) as necessary to allow its current ATSC 1.0 multicast programming streams to be hosted on other stations in the Kansas City, Missouri market. Meredith requests authorization to allow KSMO-TV’s non-primary programming streams to be aired in an ATSC 1.0 format, with no ATSC 3.0 simulcast, on two other stations in the market, KMBC(TV) and KCWE(TV). Meredith also requests that for purposes of enforcement and application of the Commission’s rules, KSMO-TV be treated as if it is airing the multicast streams over KMBC(TV) and KCWE(TV) 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 NextGen TV rules.

KSMO-TV proposes to serve as an ATSC 3.0 lighthouse station and transmit ATSC 3.0 programming streams for other in-market stations as well as for itself. In an application to transition to the ATSC 3.0 standard that is being filed contemporaneously herewith, KSMO-TV proposes to (1) transition its current primary ATSC 1.0 independent programming to KCTV(TV), co-owned by Meredith and (2) commence ATSC 3.0 operations from its current facility. Additionally, to ensure no loss of over-the-air programming to the general public, Meredith proposes to transition KSMO-TV’s four secondary/multicast program streams to two other stations in the market. Specifically, Meredith will move two of KSMO-TV’s ATSC 1.0 subchannels – 62.2 The Grio and 62.3 DABL – to KMBC(TV), Kansas City, Missouri, owned by Hearst Stations Inc. (“Hearst”). The other two KSMO-TV ATSC 1.0 subchannels – 62.4 COZI TV and 62.5 Circle – will be moved to Hearst’s KCWE(TV), Kansas City, Missouri. KMBC(TV) and KCWE(TV) will accommodate KSMO-TV’s four ATSC 1.0 programming streams along with their existing ATSC 1.0 primary and secondary multicast program streams. To comply with the Commission’s requirements, applications for KMBC(TV), KCTV(TV) and KCWE(TV) to be carried in 3.0 format on KSMO are being filed contemporaneously with the KSMO-TV application and this STA request.

Because of ATSC 1.0 capacity constraints, KSMO-TV is not able to air its multicast streams on KCTV, its primary ATSC 1.0 simulcast host. Furthermore, due to ATSC 3.0 capacity and other constraints attendant with the multi-station coordination needed for a successful ATSC

3.0 deployment in Kansas City, it is not feasible for Meredith to simulcast KSMO-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.

Simulcasting those streams in ATSC 3.0 would reduce capacity available to NexGen 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 feature 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 if KSMO-TV were 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 KSMO-TV’s multicast streams in ATSC 3.0 and ATSC 1.0 formats. Obtaining, installing and testing that equipment would, at a minimum, delay rollout of ATSC 3.0 in the Kansas City market.

As discussed above, in order 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, Meredith will transition KSMO-TV’s four secondary/multicast program streams to two other stations in the market and maintain the PSIP virtual channels for those streams pursuant to Annex B.1.7 of ATSC A/321:2016 (as incorporated in the Commission’s rules in Section 73.8000). KMBC(TV) and KCWE(TV) will accommodate KSMO-TV’s four ATSC 1.0 multicast streams along with their existing ATSC 1.0 primary and secondary multicast program streams. For clarity, KSMO-TV’s multicast streams will be hosted in 1.0 as follows:

Network	RF Channel of 1.0 Host(s)	Virtual Channel (No Change)
The Grio	29.3	62.2
DABL	29.4	62.3
COZI TV	31.3	62.4
Circle	31.4	62.5

The hosting arrangements with KMBC(TV) and KCWE(TV) will serve the public interest by enabling over-the-air viewers to continue to have access to KSMO-TV's multicast streams. Absent the arrangements with KMBC(TV) and KCWE(TV), over-the-air viewers would lose access to KSMO-TV's multicast streams. Additionally, the arrangement preserves access to those KSMO-TV multicast streams for viewers who are receiving them via MVPDs.

As shown in the attached coverage maps, 99.98% of the viewers that currently receive KSMO-TV's The Grio and DABL multicast streams over-the-air from the current KSMO-TV ATSC 1.0 facility will retain access to these multicast streams from KMBC(TV). Further, 99.8% of viewers with over-the-air reception will retain access to the multicast streams for COZI TV and Circle from KCWE(TV). In both cases, all of the KSMO-TV multicast streams will continue to serve the station's community of license. Absent these arrangements with KMBC(TV) and KCWE(TV), and without the clarity that a grant of the instant request for special temporary authority would provide, Meredith may not be able to continue to provide KSMO-TV's non-primary multicast streams over-the-air, which would result in a complete loss of service to all of the over-the-air viewers of these streams.

Although Meredith has agreed to indemnify Hearst from and against all liabilities or claims resulting from or arising out of the programming and advertising broadcast on Meredith's program streams using Hearst's facilities, Meredith is requesting the instant authorization to make clear that Meredith will remain responsible for the streams' compliance with the Communications Act and the Commission's rules and regulations. As discussed above, to alleviate any viewer confusion, the PSIP (virtual) channels for each of KSMO-TV's program streams will remain unchanged and will be identified as being associated with KSMO-TV.

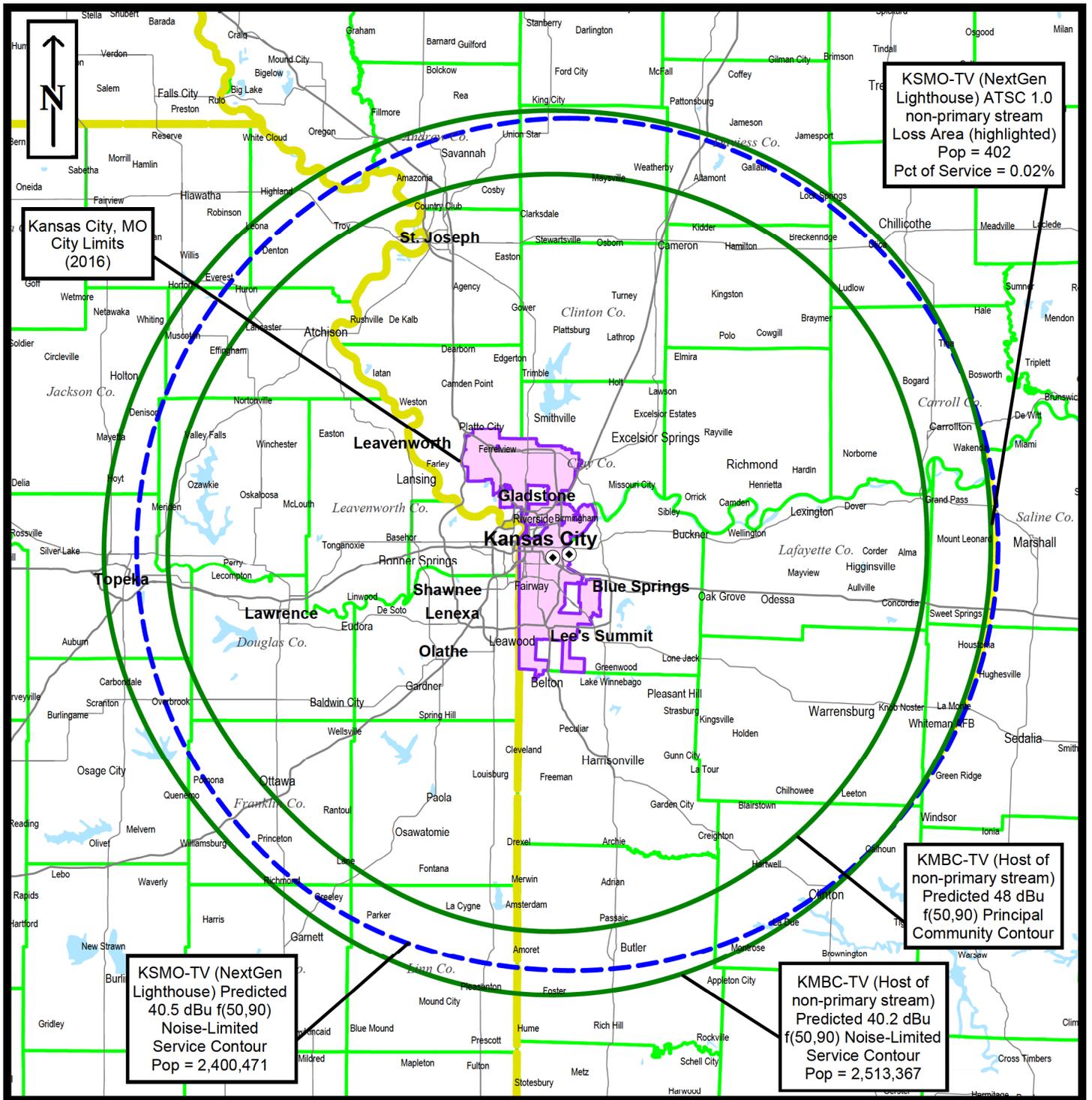
In addition, Meredith confirms that KSMO-TV currently airs two hours per week of regularly scheduled children's core programming on its primary channel and airs a third hour on its .2 digital subchannel, The Grio. Meredith intends to continue to rely on the KSMO-TV non-primary multicast stream for its third hour per week of regularly scheduled core programming in order to comply with the Commission's children's television programming requirements. Meredith notes that, as discussed above, 99.98% of over-the-air viewers will continue to have access to the children's programming aired on the KSMO-TV .2 digital subchannel through a hosting agreement with Hearst's KMBC(TV) and the children's programming aired on the KSMO-TV primary ATSC 1.0 stream will reach 99.7% of current viewers through KSMO-TV's

agreement with sister station KCTV.¹ Thus, more than 99% of current viewers will continue to have access to all children's programming currently carried on KSMO-TV.

KSMO-TV will also air the requisite consumer notices regarding the station's transition to the ATSC 3.0 standard and the need for over-the-air viewers to rescan their television sets in order to continue to receive KSMO-TV's ATSC 1.0 programming streams. Meredith also provided notice to the relevant MVPDs of its proposed multicast ATSC 1.0 signal relocations when it provided the requisite notice regarding relocation of KSMO-TV's primary stream ATSC 1.0 signal. Meredith will coordinate with the MPVDs that carry the multicast streams to ensure they continue to receive a good quality signal, whether that be over the air or via an alternative delivery method (such as a direct fiber feed).

To the extent necessary, Meredith respectfully requests grant of this STA request to broadcast the KSMO-TV ATSC 1.0 multicast streams on host stations as described above. Meredith also requests that the virtual channel mapping for the KSMO-TV ATSC 1.0 channel streams as described above appear on the face of any license(s) issued based on the instant application. Grant of this STA will serve the public interest, as it will advance the Commission's ATSC 3.0 policy goals while preserving KSMO-TV's ability to air each of its programming streams in the ATSC 1.0 format. It will also make clear that Meredith's KSMO-TV is an authorized user of a portion of KMBC(TV) and KCWE(TV)'s channels and is the party responsible for ensuring compliance with the Communications Act and the Commission's rules and regulations.

¹ See FCC File Number 0000153303.



PREDICTED COVERAGE CONTOUR MAP

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

