

WEDN(TV) APPLICATION TO CONVERT TO ATSC 3.0

In the instant application, Connecticut Public Broadcasting, Inc. ("Connecticut Public") requests authority to convert non-commercial educational station WEDN(TV), Norwich, CT, Fac. ID No. 13607, to ATSC 3.0 (Next Gen TV) operations and to comply with Section 73.3801(b) of the rules by simulcasting the WEDN primary video stream in ATSC 1.0 signal on Station WEDH(TV), Hartford, CT, which is also licensed to Connecticut Public.

Coverage Requirements: Pursuant to Section 73.3801(c) of the Commission's rules, Connecticut Public hereby certifies that WEDN and WEDH are both assigned to the Hartford and New Haven DMA. Moreover, as shown in the contour map included in the attached Technical Statement prepared by Du Treil, Lundin & Rackley, Inc., the ATSC 1.0 signal originating from WEDH's transmitter site covers Norwich, CT, WEDN's community of license, entirely.

Simulcasting Agreement: Because Connecticut Public owns both WEDN and WEDH, no simulcasting agreement is required. The programming broadcast on the WEDH primary stream is the same as the programming broadcast on the WEDN primary stream. Accordingly, Connecticut Public certifies that it will comply with all of the simulcasting requirements set forth in Section 73.3801(e) of the Commission's rules.

Rule 73.3801(f)(6) Information: As explained in the attached Technical Statement, the instant application is not eligible for expedited processing under Section 73.3801(f)(5) of the FCC's rules because the predicted population within the Noise Limited Service Contour ("NLSC") of WEDH(TV) does not cover at least 95% of the predicted population within the NLSC of WEDN's original 1.0 signal. The predicted population within the NLSC of WEDN's original ATSC 1.0 signal that will lose the Station's ATSC 1.0 service as a result of the simulcasting arrangement is 846,504, or 24.1%. However, when the predicted population is calculated using the FCC's *TVStudy* Longley-Rice prediction method, 87.5% of the predicted population of WEDN's original 1.0 signal is replicated.

Connecticut Public has evaluated other possible host stations in the market and there is no other viable host station that would result in less service loss to existing viewers than WEDH. More specifically, as detailed in the Technical Statement, a study was conducted of all full power television stations in the Hartford and New Haven DMA in which the predicted NLSC of every station listed was examined. The loss percentage for these other stations, using both 2020 census data and the FCC's *TVStudy* prediction method, is summarized below:

Station	Service Loss (2020 Census)	Service Loss (TVStudy)
WCTX	36.1%	26.0%
WTNH	36.1%	26.0%
WUVN	56.1%	45.7%
WHPX	24.7%	13.4%
WVIT	28.8%	18.2%
WCCT	29.0%	18.5%

WTIC	24.4%	13.0%
WFSB	31.3%	21.6%
WEDH	24.1%	12.5%

Four of the stations listed above—WCCT, WTIC, WFSB and WTNH—are participating in hosting agreements regarding the conversion of Station WCCT to ATSC 3.0. These stations would not have room to add a simulcast of WEDN’s primary stream. In addition, the WEDH(TV) 1.0 primary stream is broadcast in HD. Therefore, viewers will continue to have access to a 1.0 HD signal.¹

The impact of the service loss is mitigated by the following factors: As the Technical Exhibit shows, one hundred percent of the population that would lose WEDN’s ATSC 1.0 signal is located outside the Hartford and New Haven DMA. These viewers are located in the State of Rhode Island and are served by PBS affiliate WSBE-TV, Providence, Rhode Island. Connecticut Public will take appropriate steps to inform viewers of the availability of PBS programming on WSBE-TV.

In addition, Connecticut Public intends to minimize the impact of the service loss by providing PSA announcements on WEDN for at least 60 days prior to the conversion. These PSA announcements will provide information on how viewers can contact the station.

The public interest will be served by granting the instant application because it will allow the applicant to provide the many recognized benefits of ATSC 3.0 service to the Hartford and New Haven DMA. These benefits include enhanced video, immersive and multiple audio channels, advanced emergency alerting and information functions and interactive data delivery that can be used for educational purposes. These potential benefits of deploying ATSC 3.0 service on a noncommercial educational station in the Hartford-New Haven DMA outweigh the service loss, which is largely offset by the location of the service loss outside the Hartford and New Haven DMA and the presence of an alternative station providing PBS programming to these viewers. It should also be noted that the multicast programming streams broadcast on WEDN—Spirit and PBS Kids—are also transmitted by WEDH.

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