

WCVN MULTICAST LICENSING – HOST EXHIBIT

Kentucky Authority for Educational TV (“KET”), licensee of digital full power television station WCVN-TV, Covington, Kentucky (Fac. ID No. 34204) (“WCVN”), hereby submits this exhibit to provide the information required by rules established in the *Third Next Gen TV Report and Order*¹ in connection with its application requesting modification of the WCVN license to reflect the hosting of WCVN’s ATSC 1.0-formatted multicast channels on television stations other than WCVN’s primary ATSC 1.0 simulcast host. Specifically, WCVN will continue to host ATSC 1.0-formatted multicast channels on the facilities of WPTO(TV), Oxford, Ohio (Fac. ID No. 25065) (“WPTO”) and WCET(TV), Cincinnati, Ohio (Fac. ID No. 65666) (“WCET”). The Commission previously has authorized this arrangement pursuant to a grant of Special Temporary Authority.² WCVN transitioned to ATSC 3.0 broadcasts on June 5, 2023.

The hosting arrangement is as follows:

<u>RF Channel</u>	<u>Virtual Channel</u>	<u>Network</u>	<u>Resolution</u>	<u>Paired Simulcast Stream</u>
17 (WCET)	54.1	KET (PBS)	720p	WCVN.1
29 (WPTO)	54.2	KET2 (PBS)	720p	WCVN.2
17 (WCET)	54.3	KET KY (Local)	480i	None.
29 (WPTO)	54.4	KET PBS KIDS	480i	None.

As demonstrated in the engineering exhibit included in the Multicast STA Request, attached hereto, the service contours of the respective ATSC 1.0 hosts cover the vast majority of WCVN’s service area population:

<u>Stream</u>	<u>Host Station</u>	<u>Service Area Coverage</u>
54.1 (KET)	WCET	99.9999%
54.2 (KET2)	WPTO	100%
54.3 (KET KY)	WCET	99.9999%
54.4 (KET PBS KIDS)	WPTO	100%

By this request, WCVN is not seeking to license more capacity on its partner host stations, in the aggregate, than it could use if it were still operating its own facility in ATSC 1.0 format, as the four streams that are hosted in ATSC 1.0 format are those it was broadcasting on its own facility prior to its transition to ATSC 3.0. WCVN does not intend to demonstrate compliance with the Commission’s Core Programming Requirement by relying in programming transmitted by its

¹ *Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard*, GN 16-142, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, FCC 23-53 (rel. Jun. 23, 2023) (“*Third Next Gen TV Report and Order*”).

² See DTV Legal STA Application, LMS File No. 214281 (“*Multicast STA Request*”); Letter from Barbara A. Kreisman, Chief, Video Division, Media Bureau, LMS File No. 214281 (May 31, 2023) (granting Multicast STA Request).

multicast streams. WCVN has provided the required notifications to viewers and MVPDs of its hosting arrangement.

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April 10, 2023

SUPPLEMENTAL EXHIBIT FOR WCVN

INTRODUCTION

The licensee of WCVN desires to convert the WCVN facility to operate as ATSC 3.0 only. As such, additional information concerning WCVN proposed operation as it converts from ATSC 1.0 to ATSC 3.0 is provided herein.

DETAILED INFORMATION

The licensee of WCVN has entered into agreements with the licensees of WPTO and WCET to have them serve as hosts for the proposed ATSC 1.0 programming provided by WCVN. There are 4 program streams for ATSC 1.0 for WCVN. These 4 program streams are divided between WPTO and WCET as shown below.

Stream	Host Station
54.1 (KET)	WCET
54.2 (KET2)	WPTO
54.3 (KET KY)	WCET
54.4 (KET PBS KIDS)	WPTO

To confirm that the WCVN programming is compliant with FCC 73.3801 (f) (6) (i) and (ii) no matter whether WPTO or WCET is considered as the host for ATSC 1.0, the following exhibits demonstrate that the proposed agreements satisfy those requirements.

The total ATSC 1.0 population served by WCVN is 2,232,551 people. Presented first (see Exhibit 1) is a contour map confirming that the WCVN ATSC 1.0 population served within its protected contour is totally encompassed by the WPTO protected contour. The same map identifies the Community of license for both ATSC 1.0 & 3.0 which is well inside the principal city contour (also shown) of the station.

The protected contour of WCET is also identified on this map. An additional map provides a zoomed-in view of the ATSC 1.0 protected contours of WCVN and of WCET. There are 2 very small areas where the WCVN ATSC 1.0 protected contour exceeds the WCET protected contour. An analysis has calculated the area loss and population loss within these contour intersection areas. The results of that analysis indicate a worst case area and population loss of 15.5 sq km and 3 people respectively. As a percentage of the protected contour for WCVN, 2,232,551 people (2020 census basis), this is only 0.0001% . Thus, the proposed operation is compliant with 73.8901 (f) (6) because more than 95% is served.

EXHIBIT 1

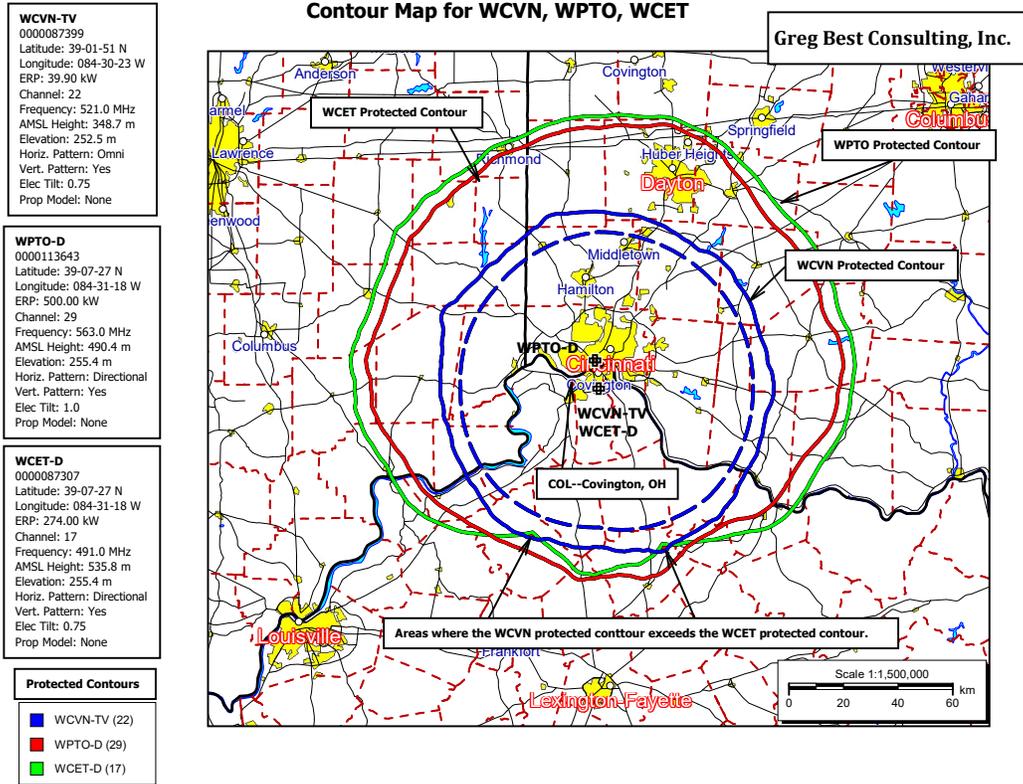
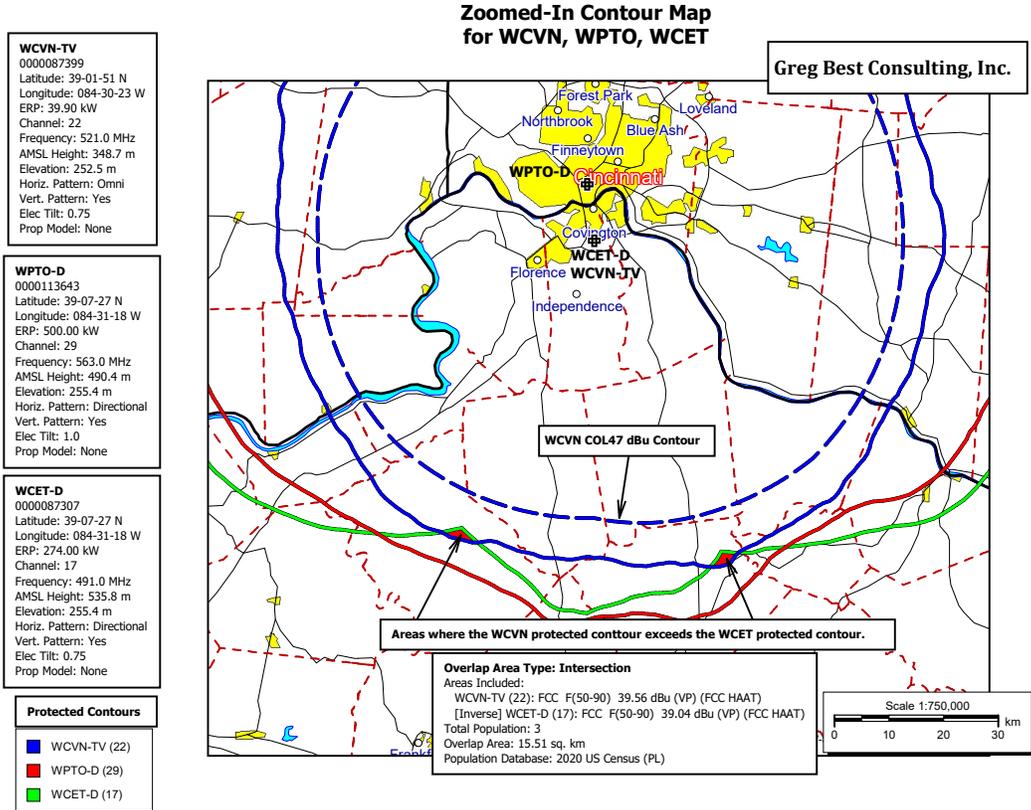


EXHIBIT 2



Sincerely,

Consulting Engineer