

Next Gen TV Host Exhibit

TEGNA Inc. (“TEGNA”), on behalf of its subsidiary Belo TV, Inc. (“Licensee”), licensee of television station WUPL, Slidell, Louisiana (“WUPL”), hereby seeks to modify its Next Gen TV license to incorporate its existing ATSC 1.0 multicast hosting arrangements, pursuant to the transition procedures set forth in the Media Bureau’s Public Notice dated November 16, 2023.¹ The ATSC 1.0 simulcast of WUPL’s primary stream will continue to be hosted on WNOL-TV, New Orleans, Louisiana (Facility ID 54280) (“WNOL”).

WUPL commenced broadcasting in the Next Gen Television standard on December 15, 2022. WUPL broadcasts, via its Next Gen Television facilities, its own MyNetwork-affiliated primary channel and the CBS-affiliated primary channel of its sister station WWL-TV, New Orleans, LA (Facility ID 74192), along with the primary channels of ABC affiliate WGNO (Facility ID 72119), Fox affiliate WVUE-DT (Facility ID 4149), NBC affiliate WDSU (Facility ID 71357), and CW affiliate WNOL, all licensed to New Orleans, LA.

Because WNOL does not have sufficient bandwidth to host WUPL’s multicast channels, the Commission granted Licensee’s request for Special Temporary Authority for WGNO, WVUE and WDSU to serve as ATSC 1.0 hosts for WUPL’s multicast channels.² Licensee has entered into channel sharing arrangements with each station to serve as ATSC 1.0 hosts for WUPL’s primary and multicast streams.

WUPL’s hosting arrangements would remain as follows, in accordance with the arrangement the Video Division approved in the *WUPL Multicast Hosting Grant*:

Virtual Channel	Affiliation	Resolution	Host	Host RF Channel	ATSC 3.0 Simulcast
54.1	MyNetwork (Primary)	720p	WNOL	15	Yes
54.2	Quest	480i	WGNO	26	No
54.3	Heroes & Icons	480i	WGNO	26	No
54.4	Defy TV ³	480i	WDSU	19	No
54.5	This TV	480i	WVUE	29	No

Host Capacity Limit

The proposed hosting arrangements comply with the Commission’s host capacity limit because WUPL was broadcasting the same number of streams, at the same resolutions, in ATSC 1.0 immediately prior to commencing Next Gen TV operation.⁴

¹ *Media Bureau Announces that All Next Gen TV ‘Multicast Licensing’ Rules Are Now In Effect And Next Gen TV License Applications for Multicast Streams Will Now Be Accepted*, Public Notice, DA 23-1086 (MB Nov. 16, 2023) (“*Multicast Licensing Transition PN*”).

² *Belo TV, Inc.*, Letter, LMS File No. 0000203660, at 2-3 (MB Vid. Div. Dec. 8, 2022) (“*WUPL Multicast Hosting Grant*”), extended by LMS File No. 0000214960.

³ At the time of the *WUPL Multicast Hosting Grant*, this stream’s affiliated network was known as TrueReal. EW Scripps Co. merged its TrueReal and Defy TV networks in March 2023. See Jon Lafayette, “E.W. Scripps Folding TrueReal Digital Network Into Defy TV,” *Broadcasting & Cable*, <https://www.nexttv.com/news/ew-scripps-folding-truereal-digital-network-into-defy-tv> (March 10, 2023).

⁴ See 47 C.F.R. § 73.3801(i)(4)(ii); *WUPL Multicast Hosting Grant* at 2 (noting that WUPL then-broadcast its primary stream and four multicast streams). At the time WUPL converted to Next Gen TV operation, its ATSC 1.0 signal contained its MyNetwork-affiliated primary stream in 720p resolution and each of its four multicast streams in 480i resolution, which are the same as the resolutions those streams are broadcast in under the existing hosting arrangements.

Coverage Requirements

WUPL, WWL-TV, WNOL, WGNO, WDSU, and WVUE all are located in the New Orleans DMA.⁵

Each host station covers WUPL's entire community of license and provides over-the-air access to 100 percent of the population within WUPL's ATSC 1.0 contour at the time WUPL transitioned to Next Gen TV operation.⁶

Notices to MVPDs and Viewers

In advance of WUPL's conversion to Next Gen TV operation, WUPL notified MVPDs that its primary and multicast streams would be relocated as described herein.⁷ WUPL also aired public service announcements to inform viewers of its transition and of the need for viewers to rescan their televisions after the transition date in order to maintain over-the-air access to WUPL's program streams in ATSC 1.0 format.⁸

Web Link

As required by Section 73.3801(f)(6)(D) of the Commission's rules, this exhibit is posted on WUPL's website at <https://www.wwltv.com/article/about-us/fcc-notices/wupl-next-gen-tv-host-exhibit/289-01f96d4e-db02-48aa-9311-b6aa4402d467>.

⁵ 47 C.F.R. § 73.3801(c).

⁶ 47 C.F.R. § 73.3801(c), (f)(6)(ii). Attached as Attachment 1 hereto is the engineering statement submitted with WUPL's request for special temporary authority to commence these multicast hosting arrangements (LMS File No. 0000203660), which sets forth the contour overlaps between WUPL's ATSC 1.0 signal and each host station.

⁷ See 47 C.F.R. § 73.3801(h).

⁸ See 47 C.F.R. § 73.3801(g).

Attachment 1

**Technical Statement in Support of ATSC 3 Host and ATSC 1 Guest
License Modification for WUPL, Facility ID 13938
Slidell, Louisiana**

Executive Summary

Belo TV, Inc. is the licensee of WUPL¹ and hereby proposes transitioning the WUPL ATSC 1.0 signal to the facilities of host stations as described in §73.3801(f)(2)(i) and converting the existing WUPL facility to transmit an ATSC 3.0 signal pursuant to §73.3801(f)(2)(iii) via the §73.3801(f)(3) streamlined process with §73.3801(f)(5) expedited processing.

Compliance with Coverage Requirements

Pursuant to §73.3801(f)(6)(i)(A), WUPL will broadcast as an ATSC 3.0 host and will operate its primary MyNetwork ATSC 1.0 signal as a guest on WNOL-TV². WUPL has 4 simulcast channels and has made the following simulcast arrangements:

- ThisTV as an ATSC 1.0 guest on WVUE-DT³,
- TrueReal as an ATSC 1.0 guest on WDSU-TV⁴, and
- Quest and Heroes & Icons as an ATSC 1.0 guest on WGNO⁵

Pursuant to §73.3801(f)(6)(i)(B), the technical parameters of the ATSC 1.0 host stations are a matter of record with the Commission and FCC File numbers are referenced in the footnotes below.

Compliance with Expedited processing Requirements

¹ Facility ID 13938 with technical facilities specified in FCC File No.: 0000112386

² Facility ID 54280 with technical facilities specified in FCC File No.: BLCDT-20121019AAR

³ Facility ID 4149 with technical facilities specified in FCC File No.: BLCDT-20110502AEC

⁴ Facility ID 71357 with technical facilities specified in FCC File No.: 0000098906

⁵ Facility ID 72119 with technical facilities specified in FCC File No.: BLCDT-20121019AAK

Appendices A, B, C, and D demonstrate the WUPL coverage area with respect to the ATSC 1.0 host stations' coverage areas. The exhibits were produced by running the licensed facilities in TVStudy V2.2.5 to generate geographical files and contours using the "general-purpose study" option. The output was subsequently mapped in Arcmap v10.7. The metadata from coverpts.shp contains 2010 population census figures along with the TVStudy result codes which determine signal coverage status for each cell studied. The coverage data was filtered to remove all points that is not considered terrain limited service⁶. The ATSC 1.0 host station's noise limited coverage area was augmented to match the WUPL noise limited contour such that a complete cell by cell comparison can be made between host facilities within the WUPL noise limited contour which lie beyond the host stations contours. The resulting coverage areas are layered with the host stations blue cells overlapping and thus masking the WUPL red cells such that if a blue cell is missing a red cell shows through visually indicating lost coverage area for WUPL. Pursuant to section 73.3801(f)(6)(ii) of FCC Rules, the analysis above and in the attached exhibit demonstrates that:

- Predicted terrain limited population within the WUPL ATSC 1.0 licensed noise limited contour is 1,719,990 people.
- Predicted terrain limited population within the WUPL ATSC 1.0 licensed noise limited contour that will lose over-the-air access to the host stations ATSC 1.0 service due to the simulcasting arrangement is 0 people for all the 4 host stations studied.
- The result of the ATSC 1.0 simulcast arrangement is that 100% of the WUPL ATSC 1.0 population will continue to have over-the-air access to each of WUPL's program streams in ATSC 1.0 format via the applicable host stations. Pursuant to

⁶ Result Codes 1 and 11 are kept and all other result codes are filtered out.

§73.3801(f)(5), The proposed arrangement thus meets the 95% retention required for expedited processing.

Pursuant to §73.3801(c) of FCC Rules, full power broadcasters that elect temporarily to relocate their ATSC 1.0 signal to the facilities of a host station for purposes of deploying ATSC 3.0 service must continue to cover the station's entire community of license with the ATSC 1.0 simulcast signal and must be assigned to the same Designated Market Area (DMA) as the originating station. Pursuant to §73.3801(c), Appendices A, B, C, and D demonstrate that the host stations will completely subsume WUPL's community of license of Slidell, LA with a 48.0 dBμV/m principal community contour and all five stations belong to the New Orleans, LA DMA. As demonstrated, the proposed host stations fully satisfy the FCC rules specified in §73.3801 and the application should therefore be granted with expedited processing in accordance with the streamlined 1-step process specified in the rules.

CERTIFICATION

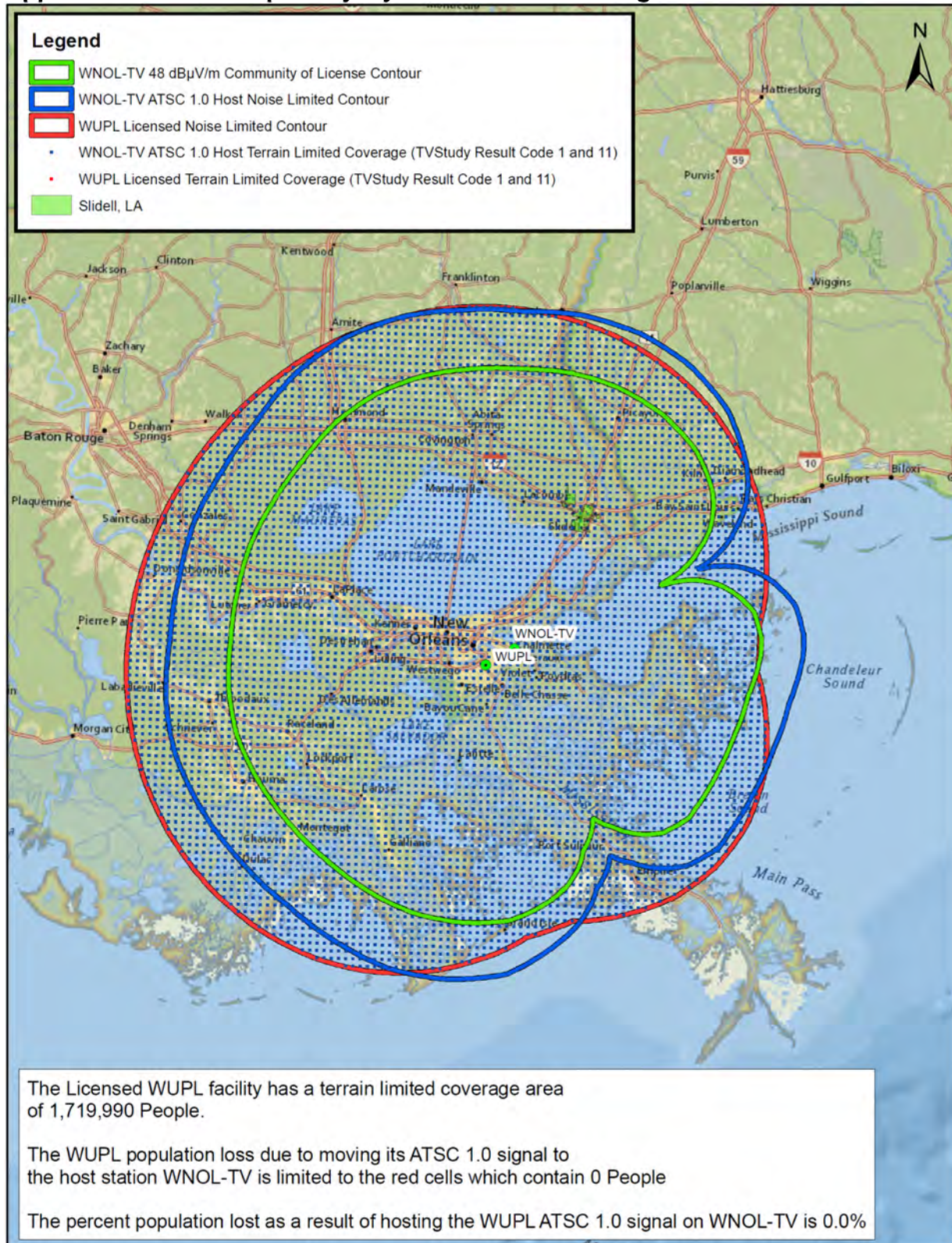
The foregoing statement and the report regarding the engineering work are true and correct to the best of my knowledge. Executed September 26, 2021

Kessler and Gehman Associates, Inc.

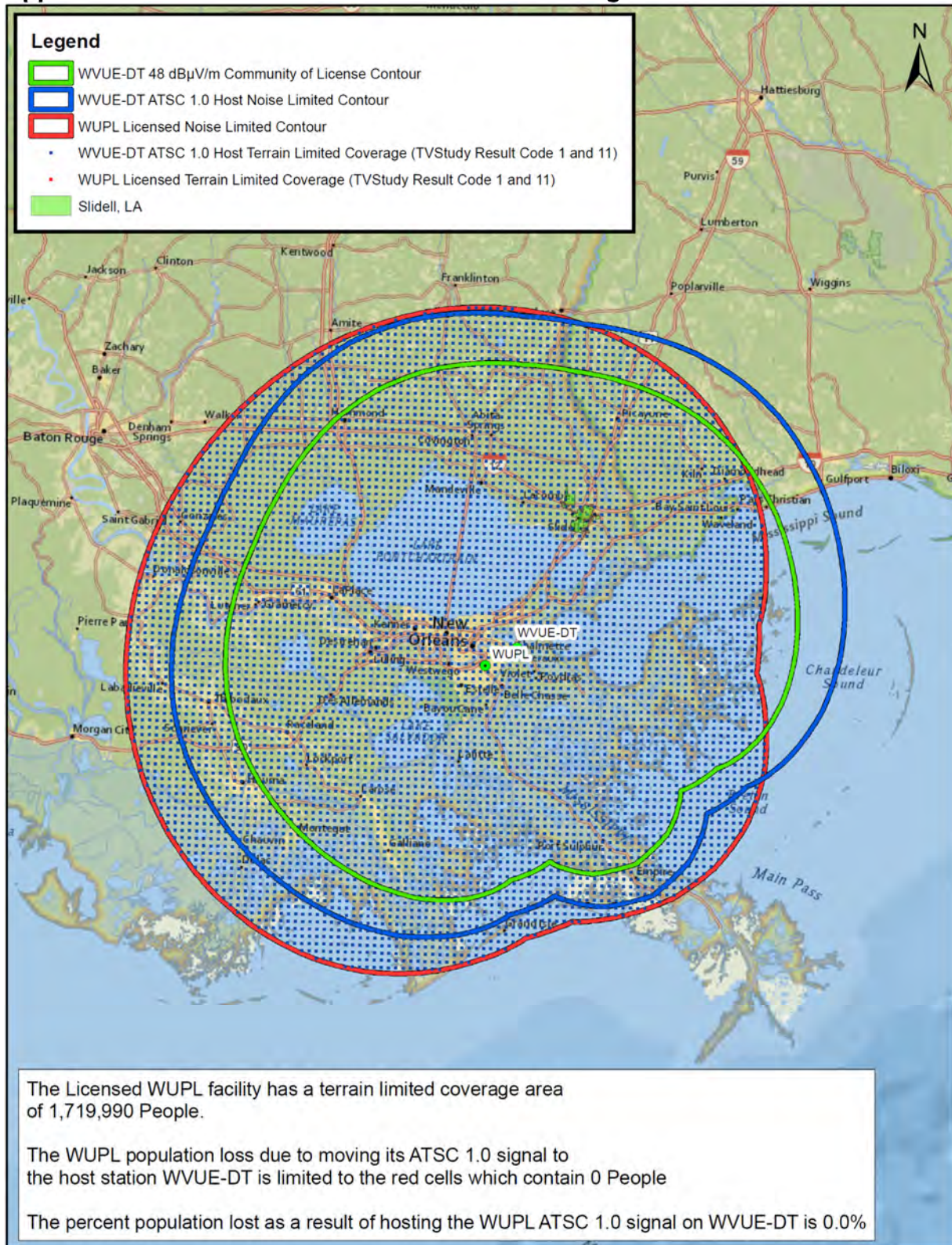


Ryan Wilhour
Consulting Engineer

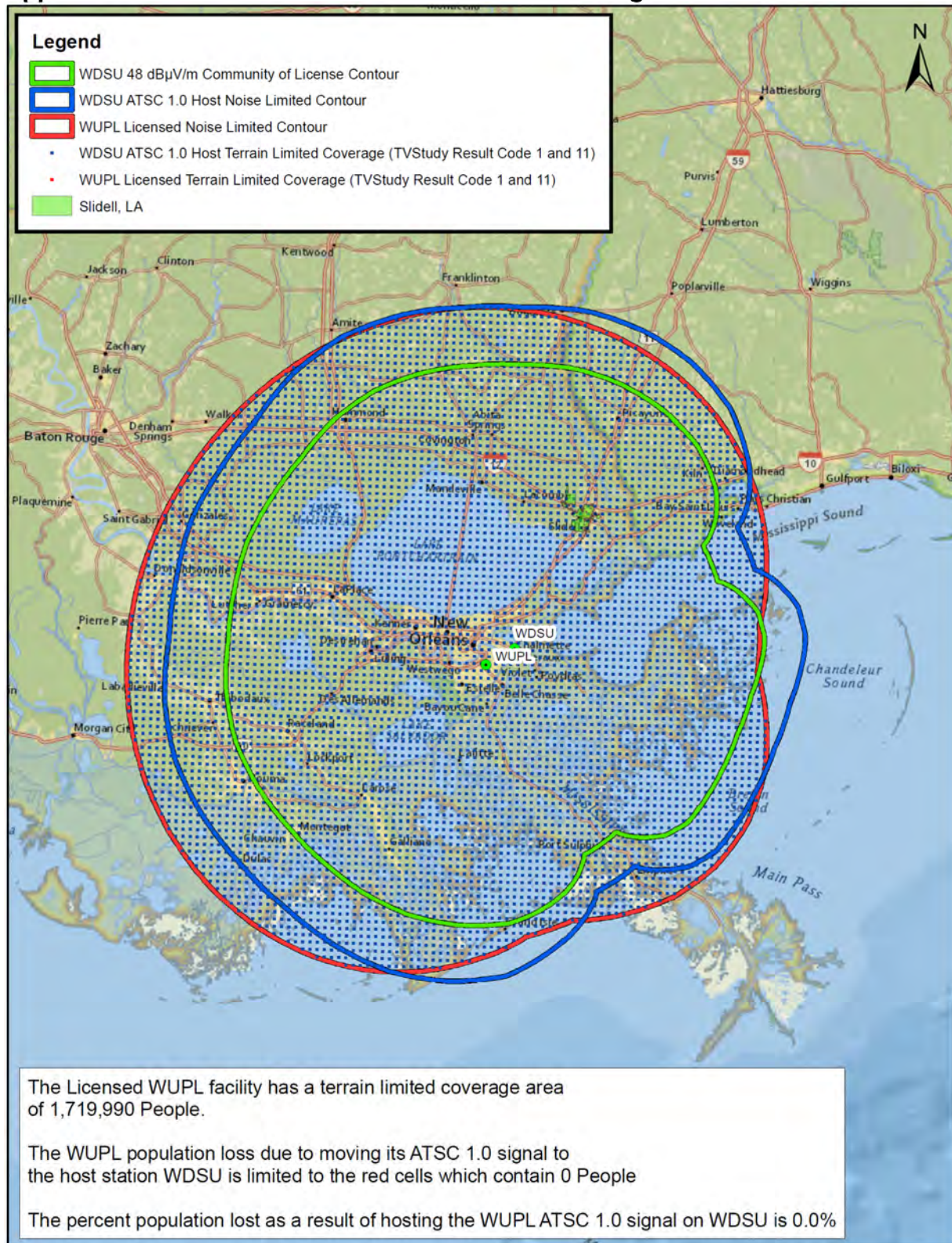
Appendix A – WUPL’s primary MyNetwork ATSC 1.0 Signal hosted on WNOL-TV



Appendix B – WUPL’s Multicast ThisTV ATSC 1.0 Signal hosted on WVUE-DT



Appendix C – WUPL's Multicast TrueReal ATSC 1.0 Signal hosted on WDSU-TV



Appendix D – WUPL’s Multicast Quest and Heroes & Icons ATSC 1.0 Signal hosted on WGNO-TV

