

**Narrative Statement  
EGOT Media, LLC**

**Request for Part 5 Experimental Authority**

EGOT Media, LLC (“EGOT”), licensee of low power digital television station WYJH-LD, Channel 27, licensed to White Lake, New York (Facility No. 31642),<sup>1</sup> and pursuant to the Commission’s Part 5 Experimental Radio Service rules, hereby respectfully requests approval for experimental special temporary authority (“STA”) to utilize WYJH-LD to conduct testing of the 5G-based radio service, provided by XGEN Networks LLC (“XGEN”), intended to ultimately be received by the members of the public on their smartphones and tablets, while maintaining television broadcasting (“5G Broadcast”). EGOT, XGEN and their partners, which include some of the largest telecommunications companies in the world, are convinced that the new 5G Broadcast technology can work in tandem with ATSC 3.0, as the United States continues to provide leadership in uses of the broadcast spectrum for advanced services. EGOT is requesting an Experimental STA for WYJH-LD for a period of six months.

This request is substantially similar to the request granted on July 14, 2023 to one of XGEN’s broadcasting partners, Milachi Media, LLC, associated with the ongoing testing of 5G Broadcast on WWOO-LD, Westmoreland, New Hampshire (File No. 0000216484). A request to extend the Experimental STA granted to WWOO-LD is currently pending (File No. 0000235198).

As the Commission is aware, there is significant appetite for 5G spectrum in the United States, as the number of connected devices continues to grow at a rapid pace, driven by the proliferation of smartphones, tablets, laptops, Internet of Things devices, etc. There also has been a substantial increase in data consumption, as more and more users stream videos and download large files. Indeed, 76 percent of people aged 18-34 use their smartphones to watch online video content on a weekly basis.<sup>2</sup> In addition, autonomous vehicles, smart cities, advanced healthcare systems and, most importantly, first responders, need substantial swaths of spectrum. In short, the demand is increasing, with no end in sight.

Under the new 5G Broadcast technology, EGOT, XGEN and their partner telecomm companies envision a highly-efficient use of spectrum resources and the simultaneous (and very speedy) delivery of content to multiple users, all with the potential to reduce congestion on the presently-overworked network. For example, using 5G Broadcast, emergency alerts would be received by members of the public on their smartphones or tablets – as well as their traditional televisions – in less than one second (as opposed to between 30 seconds to 3 minutes on a cell phone or 15 seconds by FM radio).

Milachi, XGEN and their partners also are investigating using 5G Broadcast to deploy new services, such as immersive media experiences, virtual and alternative realities, plus connected motor vehicles, and faster software updates. Indeed, 5G Broadcast has the potential to transform

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<sup>1</sup> On January 23, 2024, EGOT filed a request with the Commission to change the community of license for WYJH-LD to Danbury, CT.

<sup>2</sup> See <https://www.statista.com/statistics/605628/frequency-video-services-used-by-smarphphone-users-united-states/#:~:text=According%20to%20an%20October%202022,devices%20for%20the%20same%20activity>

the way content services are delivered to smartphones and tablets, without compromising existing mobile cellular communications.

Testing in the U.S. and other countries has shown that 5G Broadcast not only can deliver signals to cell phones and tablets, but also in a format – in the television band – that works with other IP delivery services and to televisions. To date, in both public and private tests, XGEN has demonstrated successful delivery of 5G Broadcast directly to smart phones and software-defined radio (“SDR”) receivers using the broadcast spectrum. In addition, technology innovator Rohde & Schwarz is actively testing software updates to their 5G Broadcast equipment. Attached to this request are a series of articles describing the history of 5G Broadcast to date, as well as Abstracts presented to the 2023 International Broadcasting Convention.

During the six-month Experimental STA period, as set forth in part in the attached Proof of Concept, EGOT and XGEN intend to focus on Emergency Alerts, First Responder solutions thereto, and technical field testing to deploy such solutions. In particular, EGOT and XGEN intend to, among other things, test: (a) the ability of a local 911 call center to conduct emergency video and data communications with first responders; and (b) iPAWS and first responder emergency alerts. The testing would include delivery of the signal to different types of smart phone devices, as well as encrypted communications between the 911 dispatch center and first responders.

As set forth in the attached Engineering Statement of Communications Technologies, this proposal fully complies with the Commission’s relevant technical rules and will not adversely affect the operations of any other DTV facility. Indeed, this request for STA does not request any change to WYJH-LD’s frequency (it would remain on Channel 27), no change to WYJH-LD’s authorized directional antenna pattern as set forth on WYJH-LD’s authorized construction permit (File No. 0000218027) (“Permit”), no change to WYJH-LD’s effective radiated power as set forth in the Permit (15 kW), and no change to WYJH-LD’s proposed transmission line and antenna in the Permit. The only change to the WYJH-LD transmitter will be substitution of 5G, rather than ATSC 1.0 modulation, at the exciter level. WYJH-LD is not carried by any multichannel video programming distributors, and thus no MVPD systems or viewers will be impacted by a grant of this request.

In summary, a grant of Experimental STA to WYJH-LD would serve the public interest because the information and data obtained from the tests will be valuable in evaluating the future use and development of 5G Broadcast technology, which EGOT, XGEN and their partners believe will bring significant benefits to the U.S. public, especially to First Responders.