WTXX-LD EXPERIMENTAL STA EXHIBIT

HC2 Station Group, Inc. ("HC2"), the licensee of WTXX-LD, Springfield, Massachusetts ("WTXX"), by its counsel and pursuant to Section 5.203 of the Commission's rules, 47 C.F.R. § 5.203, hereby requests a 6-month experimental Special Temporary Authority ("STA") to permit WTXX to conduct testing of the 5G-based radio service ("5G Broadcast") provided by XGEN Networks LLC ("XGEN"), intended to be ultimately received by the viewing public on their smartphones and tablets, while maintaining television broadcasting. XGEN and its partners, which include some of the largest telecommunications companies in the world, are experimenting with new 5G Broadcast technology that can work in tandem with ATSC 3.0.

This request is substantially similar to the experimental STA request granted on July 14, 2023 to WWOO-LD, Westmoreland, New Hampshire ("WWOO"), File No. 0000216484, to conduct 5G Broadcast experiments. HC2's understanding is that WWOO has operated a 5G broadcast almost continuously since receiving its experimental STA, with no technical issues or complaints. A request to extend the experimental STA granted to WWOO is currently pending, File No. 0000235198.

The proposed experimental operations on WTXX would be part of Phase 2 of XGEN's continued 5G Broadcast experiments. Phase 2 is focused on methods to enhance Emergency Alerts, expanding first responder solutions (including the use of encrypted emergency alerts to First Responder mobile phones, so that first responders have more details going into emergency response situations), and conducting technical field testing to deploy those solutions.

Among other things, the WTXX 5G Broadcast operations will be used to test the ability of a local 911 call center to conduct emergency video and data communications with first responders using 5G Broadcast. 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.

5G Broadcast testing in the United States 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 receivers using broadcast spectrum. In addition, technology innovator Rohde & Schwarz is actively testing software updates to their 5G Broadcast equipment.

Compliance with Section 5.203

The proposed experimental operations comply with Section 5.203. The authorized power of the station will not exceed the maximum power specified in the WTXX license.[1]

[1] 47 C.F.R. § 5.203(c)(1).

Emissions outside the authorized bandwidth will be attenuated to the degree required.[2] HC2 requests authority to operate on a 5G Broadcast basis 24 hours per day, subject to non-interference to other stations.[3] Because the experimental operations will be in lieu of WTXX ATSC 1.0 operations, the prohibition of sponsored programs and commercial announcements does not appear to apply;[4] to the extent necessary, a waiver of Section 5.203(c)(4) is requested because the 5G Broadcast operations of WTXX will essentially serve as a replacement of the ATSC 1.0 service during the period of experimental operations. Regularly scheduled programming will be transmitted without any significant impairment of service.[5] No charges will be made, either directly or indirectly, to view the experimental operations of WTXX.[6]

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 WTXX's frequency, antenna pattern or effective radiated power. The only change to the WTXX transmitter would be the substitution of 5G Broadcast, rather than ATSC 1.0 modulation, at the exciter level. WTXX 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 addition, the experimental operations will be conducted in full compliance with OET-65 Guidelines.

Technical Contact Information

Contact information for the individual responsible for the technical operations of WTXX, and for use in the event of an interference problem, is as follows:

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For the reasons set forth above, HC2 submits that the public interest would be served by a grant of this experimental STA request.

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[2] *Id.* § 5.203(c)(2).
[3] *Id.* § 5.203(c)(3).
[4] *Id.* § 5.203(c)(4).
[5] *Id.* § 5.203(c)(5).
[6] *Id.* § 5.203(c)(6).