

**Narrative Statement
Milachi Media, LLC**

Request for Extension of Part 5 Experimental Authority

Milachi Media, LLC (“Milachi”), licensee of low power digital television station WWOO-LD, Channel 28, licensed to Westmoreland, New Hampshire (Facility No. 186685), and pursuant to the Commission’s Part 5 Experimental Radio Service rules, hereby respectfully requests an extension – by six months – of its experimental special temporary authority (File No. 0000216484) (“Phase One STA”).

As previously reported to the Commission, XGEN Networks LLC (“XGEN”) has been developing a new 5G-based radio service for use by members of the public and first responders on smartphones and tablets, which utilizes spectrum reserved for over-the-air television use – while simultaneously maintaining television broadcasting (“5G Broadcast”). Since July 2023, when the Commission granted the Phase One STA, Milachi reports that:

1. Milachi has successfully built out and operated the new 5G Broadcast standard on WWOO-LD.
2. In public and private tests, Milachi has demonstrated successful delivery of 5G Broadcast using the broadcast spectrum allocated to WWOO-LD directly to smart phones and software-defined radio (“SDR”) receivers. In addition, technology innovator Rohde & Schwarz is actively testing software updates to their 5G Broadcast equipment.
3. No viewer or other broadcaster has complained to Milachi regarding any aspect whatsoever of the delivery of 5G Broadcast, in part because WWOO-LD is not carried by any multichannel video programming distributors, and thus no MVPD systems or viewers have been impacted by WWOO-LD’s 5G Broadcast offerings.

By this request, Milachi, XGEN and some of the largest telecommunications companies in the world (who have been collaborating with Milachi and XGEN on this project) are seeking Commission approval to extend (and soon intend to modify) the Phase One STA (“Phase Two STA”).

As part of the Phase Two STA, Milachi will be seeking Commission approval to build and operate a 5G Broadcast single frequency network (“SFN”) (also known as a distributed transmission system (“DTS”)) associated with WWOO-LD from a site located in Foxboro, Massachusetts, while continuing to operate the primary WWOO-LD transmitter from One Beacon Street in Boston. The SFN/DTS site in Foxboro would be located within WWOO-LD’s noise-limited signal contour. Milachi intends to provide the Commission with the technical information, including an Engineering Statement from Communications Technologies, in the near term. In the meantime, Milachi would continue to undertake 5G Broadcast testing pursuant to the parameters set forth in the Phase One STA.

During Phase Two, from the Foxboro site, Milachi and XGEN would focus on Emergency Alerts, First Responder solutions thereto, and technical field testing to deploy such solutions. In particular, Milachi and XGEN intend to, among other things, test: (a) the ability of the Southeastern Massachusetts 911 call center (located in Foxboro) to conduct emergency video and data communications with first responders; (b) iPAWS and first responder emergency alerts; (c) mobile phone reception/handoff between the main WWOO-LD transmitter site and the Foxboro site; and (d) deployment of the Foxboro site. The Phase Two 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 under the Phase One STA, Milachi would continue to operate a single broadcast stream available to all viewers during Phase Two.

For the foregoing reasons, grant of this request would continue to 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 Milachi, XGEN and their collaborators believe will bring significant benefits to the U.S. public., including through emergency alerts and use by first responders.