

February 15, 2024

*Re: Request to Expedite KNXT CSA Modification and Waiver*

Dear FCC Video Division,

My Central Valley, LLC purchased KNXT-LD in 2021 and built the MyTV53 programmed channel to serve the Central Valley of California. Prior to ownership, the station was silent and in distress. Knowing the challenges that VHF stations face, our team engineered the station to best serve the viewers and propagate the allotted contour by investing in and installing a custom, high end, circular polarity antenna and stat mux encoder. Though this helped, unfortunately, it did not solve the interference and reception issues that we face.

To assist with viewer complaints about reception issues and in addition to many equipment tweaks over the years, our engineer has, on many occasions, personally helped viewers with their antennas, made house calls to do so himself, and even had other engineers assist. We have even gone as far as buying new antennas for viewers. However, throughout the years up to the most recent live local sports events, as more viewers tune in for live local programming, we are still hearing of reception issues.

To resolve this, we are seeking FCC approval on a minor modification and waiver for a Channel Share Agreement with KIFR TV, which also serves the Bakersfield DMA in signal reach. Unfortunately, it has taken us some time and leg work to find this as a viable solution to KNXT and viewer needs, which resulted in us requiring the timing of approval and implementation to be as soon as possible.

We humbly request that FCC expedite the approval of the modification and waiver for CSA with KIFR TV. We request this so that the transition can be complete before the new sports seasons begin so that viewers can receive interference free programming, to be able to send a clean signal to MVPDs for expedited carriage of MyTV53 to serve more viewers, to not interfere with the viewer experience during the sports seasons, to better fulfill our agreements, and to not interfere with small business sports sponsorship/advertising campaigns.

As we head into a new Mixed Martial Arts (MMA) season on March 1<sup>st</sup>, United Soccer League One (USL) season in early March, Valley Minor League Baseball (MiLB) season in April, and local College and High School Championships and Spring events coming in March through June, MyTV53 is the only place for OTA viewers and MVPD subscribers in the California Central Valley to watch these local teams, athletes, and students compete. If the signal is not fixed many viewers, fans, parents, friends, student families, athletes, and students themselves will miss out on watching their events.

In addition, viewers are better served by the channel being carried on Comcast and other MVPD carriers who serve the Valley. We have had discussions with three of them and they are happy to carry the station as long as they can receive a clean, un-interrupted signal at their headend. Currently, due to the interference on ch.6, KNXT does not fulfil their requirements.

However, Comcast specifically, has confirmed that they receive the KIFR TV signal cleanly and told us that MyTV53 will be on their platform very quickly should the transition occur. If we are not able to make this move and complete carriage very quickly, it is likely that we will lose the agreement to produce and broadcast the home games of boys and girls/men's and women's sports, arts and music. We are working with the largest school district and college in the Valley to get the students even more recognition and support, but reach is key to the success of this initiative.

Further, the viewers are best served if the transition to the new tower with clearer signal delivery is complete before the season begins so that there are no interruptions to viewership during the switch. We will need to inform viewers through various means that they will need to rescan their TV sets and set top boxes to receive the new station. This will take some time to successfully get the message to viewers. Making these changes after the seasons start is not only less desirable for the viewer as they will likely miss events, but it is not desirable for the many local businesses that support the events. In addition, the less interference and interruptions, the better of a partner we are to the teams that we are working with for the 2024 season.

In addition to being the largest MyNetwork in Central California, the MyTV53 team was the first to produce and broadcast local MiLB from teams around the Valley; all local USL Soccer home games and community events; local MMA competitions from all over the state focused on the Central and South Valley; Central Valley Women's college sports; a 30 minute show dedicated to the high school student athletes from around the Central Valley; as well as the first and only station to have a truly local nightly news made up of a team of college and high school interns and differently abled people working directly with award winning professional news anchors and journalists. MyTV53 is also the first to have a Hispanic female soccer and MMA commentator in the Valley who is from a small, underserved town in the Central Valley. She also works at an elementary school in Parlier and reports on our news as well. MyTV53 is helping to show young girls that they can embrace who they are, live their dreams and put their small town on the map for something positive. These important initiatives are at the core of what we do at MyTV53. The public and all the local businesses that support our goals would be better served to have their stories reach more viewers in the communities that we serve.

Unfortunately, due to channel issues for MyTV53, if we are not able to come to a solution quickly, the stations will not be able to continue to serve the market as they have been, if at all. We sincerely appreciate your consideration and your work to expedite this filing to help MyTV53 and KIFR TV continue to serve the Central Valley as only local station owner/operators who care about their communities can.

Sincerely,

The MyTV53 Team