

Narrative Statement
KUPN Licensee, LLC
Request for Media Bureau Part 5 Experimental Authority

On behalf of KUPN Licensee, LLC, and pursuant to the Part 5 Experimental Radio Service rules and regulations of the FCC, the applicant hereby respectfully requests approval for the instant ATSC 3.0 experimental application for special temporary authority (“STA”) to conduct experimental testing using full-power DTV facilities in order to evaluate ATSC 3.0 technologies for the benefit of the television industry and the public. Specifically, the applicant is proposing to multiplex the Channel 33 signal in the Las Vegas market, using the antenna that is currently being used by licensed station KSNV(TV), Las Vegas, Nevada.

As the Commission is aware, much progress has been made regarding the ATSC 3.0 standard, and the requested STA will be used to test the latest ATSC 3.0 technologies with a focus on mobile applications. The requested STA will permit a comparison to the current operational standard. The applicant will also be providing open demonstrations in Las Vegas to the public at the upcoming **Consumer Electronics Show January 8-11, 2019, and the National Association of Broadcasters Show April 6-11, 2019**. In short, the applicant intends to use the information gathered to further develop the ATSC 3.0 for the benefit of the viewing public at large.

The applicant would like to begin the testing for the planned demonstrations as soon as possible and in advance of both public events to ensure successful demonstrations. The applicant hereby respectfully requests expedited Media Bureau approval of the STA for an initial period of **six months** to conduct the required ATSC 3.0 testing. It is the applicant’s intent to begin the experimental testing *immediately* upon issuance of the Media Bureau’s authorization, and the applicant will do so in compliance with the terms of the authorization and the pertinent FCC Rules.

As described in the **Engineering Statement** submitted along with the instant application and prepared by John E. Hidle of Carl T. Jones Corporation (Mr. Hidle’s experience is a matter of record before the FCC), the instant proposal fully complies with the relevant technical rules and regulations of the Commission. As shown in the **Engineering Statement**, the instant request proposes a maximum **ERP of 42 kW**, however the actual experimental ERP might be adjusted to various levels below the proposed maximum as a part of the experimental process.

The applicant submits that a grant of the instant STA application is in the public interest because the information and data obtained from the tests will be valuable in evaluating the future use and development of ATSC 3.0 technology, equipment, systems and services for use by the public and television licensees going forward.