

**Narrative Statement
KUPN Licensee, LLC
Supplemental 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 is being made to advance the ATSC 3.0 standard (with helpful assistance from the FCC). The requested STA will be used to test the latest ATSC 3.0 technologies with a focus on mobile applications. Provided below is a narrative explaining why the proposed STA is critical to testing and advancing the standard. While ATSC 3.0 testing has been ongoing in a number of markets, the experimental authority proposed in the instant STA request goes beyond current testing.

Specifically, the applicant has been asked by major automotive electronics providers (including Harmon/Samsung) to support developments which highlight the role of ATSC 3.0 as an integrated “dashboard radio” mechanism and to demonstrate key technological advancements in providing content, data and verified key exchange for vehicle to vehicle (V2V) communications. This has been a very important missing piece in the smart-car and future autonomous vehicle domain that will soon be implemented. The experimental request is critical for V2V technologies to be accepted by the public and manufacturers as a key exchange for V2V communications in the public interest.

In addition to the request mobile V2V applications, the applicant also intends to work with several large system providers to demonstrate the first complete “end-to-end” broadcast automation chain with personalized ad insertions for TV viewers. The goal is that TV broadcasters can leverage a complete “ad tech” system that can drive both ATSC 1.0 and 3.0, and drive dynamic ad insertion (DAI) and other key enhancements critical to the broadcast industry. Given the large scope of these efforts, the applicant respectfully requests the immediate grant of this STA so that this activity can be planned and executed promptly.

The requested STA will permit a comparison to the current operational standard. The applicant will 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 through the STA 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.