

**EXPERIMENTAL AUTHORIZATION
KSTR-DT (FACILITY ID No. 60534)
NARRATIVE
NEXT GEN TV DEPLOYMENT
SINGLE FREQUENCY NETWORK
DALLAS, TEXAS**

UniMás Dallas LLC (“**UniMás**”), pursuant to 47 C.F.R. §§ 5.201, 5.601 and 5.602 (as applicable), respectfully requests that the Commission grant Experimental Authorizations to allow KSTR-DT, Irving, TX (“**KSTR**”) to supplement its deployment of next-generation television broadcasting in the Dallas-Ft. Worth Designated Market Area (“**DMA**”)¹ with the installation of a Single Frequency Network (“**SFN**”). Experimental Authorizations are required because the Commission has not yet finalized the forms required for authorization for stations to commence ATSC 3.0 operations.²

Next Gen TV Deployment

As noted in the granted Experimental Authorization for full-power deployment of Next Gen service in Dallas on KSTR, the initial phase Next Gen TV deployment will involve three licensed UHF broadcast stations. KSTR has agreed to implement the ATSC 3.0 platform and act as an ATSC 3.0 “Host” facility for a period of two years (subject to FCC authorization), while the remaining two stations will act as ATSC 1.0 “Host” facilities.

Single Frequency Network

In conjunction with the ATSC 3.0 Experimental Authorization for ATSC 3.0 transmission by KSTR (RF Channel 48), the parties intend to construct and operate a three-tower, SFN array pursuant to the Distributed Transmission System (“**DTS**”) requirements embodied in §73.626 of the Rules. The SFN locations are in Denton, Garland and Ft. Worth and more specifically identified in the Engineering Statement. Each SFN tower site will be capable of transmitting six separate channels, but for this phase of the Dallas ATSC 3.0 deployment only one channel will be broadcast (RF Channel 48). The Report & Order notes that the existing DTS rules are adequate to provide authorizations for SFN deployment. Pursuant to §73.626(f), an application proposing use of a DTS will not be accepted for filing unless it meets the specified conditions referenced in the subsection. The Engineering Statement provides the required information for each of the SFN transmitter location sites. Figure 1 graphically illustrates the SFN location sites and coverage contours.

As noted in the attached engineering statement, the TVStudy results also show significant predicted interference to two Low Power Television (**LPTV**) stations: K48NY-D, Channel 48 in Gainesville, Texas; and, KTPN-LD, Channel 48 in Tyler, Texas. Although a full-power DTS

¹ File No. 0000063555, granted on Feb. 14, 2019.

² See Letter from Barbara A. Kreisman, Chief, Video Division, Media Bureau, Federal Communications Commission, to Christopher G. Wood, UniMás Partnership of Phoenix, March 29, 2018, File No. 0000048791. It is our understanding based on informal conversations with the FCC staff that, although the Office of Management and Budget has approved the forms, the applications in the LMS system may not be available for several weeks.

facility proposal need not consider interference to LPTV stations, since the latter are considered by the Commission to have secondary status to the former, a request for an experimental full-power facility must address such interference to LPTV stations. It has been determined that K48NY-D is presently not operating with its licensed facilities on Channel 48, as shown in attachments to the instant application.³ Similarly, the licensee of KTPN-LD has indicated that it is currently silent and, in any event, interference to KTPN-LD has been accepted by the licensee.⁴ As a result, grant of the instant application is not affected by the two LPTV stations in the DMA.

Inasmuch as the Dallas market is designated as Phase 3 of the Incentive Auction repack, we have included an analysis of potential interference created by the SFN utilizing KSTR's repack channel 34. One LPTV currently is licensed to use that channel: KJJM-LD (Facility ID No. 26957), licensed to HC2 LPTV Holdings. As part of the repack, that station will be displaced and has requested a construction permit to move to channel 12 (File No 0000051677). As a result, the post-repack environment will not create any interference potential or inhibit the grant of the instant application.

For the reasons set forth herein, KSTR requests that the Commission promptly authorize the station to operate the SFN. Experimental Authorizations will serve the public interest by helping to advance the technical capabilities of over-the-air television, while preserving viewers' access to the ATSC 1.0 signal.

³ See Affidavit of Bryan Switzer, March 6, 2019, attached.

⁴ See Letter from Anthony Malara, III, White Knight Broadcasting, Inc. March 13, 2019, attached.

Figure 1

