

## **Statement in Support of Temporary Extension of Experimental Authorization for KSAZ-TV ATSC 3.0 Operations**

NW Communications of Phoenix, Inc. (“Licensee”), licensee of full power television station KSAZ-TV, Phoenix, AZ (Facility ID 35587) (the “Station”), respectfully requests that the Commission grant a single, six-month extension of its Experimental Authorization (File No. 0000067924) to allow Licensee to continue testing ATSC 3.0 operations as part of the Phoenix Model Market. Licensee’s current Experimental Authorization is set to expire on November 14, 2019. This extension request enjoys the support of Fox’s partners in the Phoenix Model Market.

Licensee recognizes and appreciates that the Media Bureau began accepting ATSC 3.0 license applications through LMS on May 28, 2019.<sup>1</sup> At that time, the Media Bureau announced that it would “no longer grant new experimental authorizations or extend existing authorizations, absent unique and compelling circumstances.”<sup>2</sup> However, unique and compelling circumstances justify grant of this Extension Request.

The Station is part of the Phoenix Model Market, a test bed for industry to innovate and grow ATSC 3.0’s capabilities. The Phoenix Model Market has industry’s deep support, and it is estimated that more than \$44 million has been invested in the project by broadcasters, transmission vendors, and consumer electronics manufacturers. Licensee’s investment in and contributions to the Phoenix Model Market benefit the U.S. broadcasting industry and the viewing public at large as the knowledge gained and the standards developed through this endeavor are being shared openly across the industry.

An extension is necessary to ensure that the important development and testing work ongoing in the Phoenix Model Market can continue without disruption for the following reasons:

- Much of the temporary content sharing occurring as part of the Phoenix Model Market is done informally, often on a handshake agreement. Drafting, negotiating, and signing formal simulcasting agreements for all of this content sharing would be difficult and disruptive at this time.
- Most of the equipment in the Phoenix Model Market is on loan from various broadcast vendors, which are using this project to refine their products. These vendors are providing their equipment and expertise to demonstrate and improve their ATSC 3.0 capabilities, which is helping improve ATSC 3.0 launches throughout the country. However, these equipment loans are based on the expectation that the equipment that has been lent is being used for experimental purposes, not commercial operation.
- Consumer electronics (“CE”) manufacturers are using the knowledge gained from the Phoenix Model Market to develop prototype television sets. These prototypes do not yet implement many ATSC 3.0 features, and have not been through any conformance testing process. Licensee daily provides conformance stream broadcasts for these CE manufacturers, which is critical to both the broadcast equipment and receivers given the need for real-world testing prior to committing a design to manufacturing. Most CE manufacturers will need to make production decisions in the fourth quarter of 2019 order to

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<sup>1</sup> *Media Bureau Announces That it Will Begin Accepting Next Generation Television (ATSC 3.0) License Applications in the Commission’s Licensing and Management System on May 28, 2019*, GN Docket No. 16-41 at ¶ 8 (May 23, 2019).

<sup>2</sup> *Id.*

produce TVs for 2020. Disruption of this workflow could undermine the rollout of ATSC 3.0 in the marketplace generally.

- The framework for the ATSC 3.0 consumer application, which will provide an enhanced experience for the end user, is still in development. Licensee is working with its partners in the Phoenix Model Market on a compressed timeline to finish the application framework by this fall and turn this over to CE manufacturers for implementation and integration. This application, however, will require testing in an actual broadcast environment.

Finally, Licensee does not anticipate seeking a further extension of the Experimental Authorization beyond the six-month extension sought here. Because the extension sought will be limited in duration, granting it would not undermine the Bureau's general policy with respect to ATSC 3.0 licensure. Moreover, Licensee is not proposing to make any changes that would affect coverage of the Station's current ATSC 1.0 stream that transmits on VHF Channel 10.

Accordingly, Licensee respectfully requests a single, six-month extension of the Experimental Authorization, until May 14, 2020.